



# Study exploring the context, challenges and possible solutions in relation to the quality of traineeships in the EU

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
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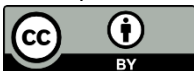
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## Table of Contents

<b>ABSTRACT</b> .....	<b>I</b>
<b>EXECUTIVE SUMMARY</b> .....	<b>II</b>
<b>RAPPORT DE SYNTHÈSE</b> .....	<b>X</b>
<b>KURZFASSUNG</b> .....	<b>XVIII</b>
<b>1 INTRODUCTION: POLITICAL AND LEGAL CONTEXT</b> .....	<b>1</b>
<b>2 PROBLEM DEFINITION</b> .....	<b>3</b>
2.1 Scope and definitions .....	3
2.2 Prevalence of traineeships in the EU27 .....	6
2.3 What is/are the problems? .....	17
2.4 Consequences of the identified problems .....	31
2.5 What are the problem drivers? .....	35
2.6 How likely is the problem to persist? .....	56
<b>3 WHY SHOULD THE EU ACT?</b> .....	<b>57</b>
3.1 Legal basis .....	57
3.2 Subsidiarity: Necessity of EU action .....	57
3.3 Subsidiarity: Added value of EU action .....	58
<b>4 OBJECTIVES: WHAT IS TO BE ACHIEVED?</b> .....	<b>59</b>
<b>5 WHAT ARE THE AVAILABLE POLICY OPTIONS?</b> .....	<b>60</b>
5.1 What is the baseline from which options are assessed? .....	60
5.2 Description of the policy options .....	66
5.3 Options discarded at an early stage .....	70
<b>6 WHAT ARE THE IMPACTS OF THE POLICY OPTIONS?</b> .....	<b>71</b>
6.1 Identification of impacts of measures under Policy Area 1 .....	71
6.2 Identification of impacts of measures under Policy Area 2 .....	80
6.3 Identification of impacts of measures under Policy Area 3 .....	86
6.4 Identification of impacts of accompanying measures .....	90
<b>7 HOW WILL ACTUAL IMPACTS BE MONITORED AND EVALUATED?</b> .....	<b>91</b>
<b>ANNEXES</b> .....	<b>92</b>
<b>ANNEX 1. ADDITIONAL EVIDENCE FOR THE PROBLEM DEFINITION</b> .....	<b>92</b>
Annex 1.1. Industry and occupation classifications used for descriptive evidence .....	92
Annex 1.2. Additional figures on unpaid trainees .....	94
Annex 1.3. Summary tables on paid and unpaid traineeships .....	94
Annex 1.4. Data on usefulness of traineeships for finding a job .....	96
Annex 1.5. Detailed socio-demographic characteristics .....	96
Annex 1.6. Additional characteristics of trainees in the Eurobarometer .....	117
Annex 1.7. Detailed analysis of the vacancy data .....	121

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

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Annex 1.8.	Mapping of legal provisions across Member States .....	124
<b>ANNEX 2.</b>	<b>SYNOPSIS REPORT .....</b>	<b>148</b>
Annex 2.1.	Survey.....	148
Annex 2.2.	Interviews.....	155
<b>ANNEX 3.</b>	<b>ANALYTICAL METHODS .....</b>	<b>161</b>
Annex 3.1.	Methodology to estimate the prevalence of traineeships .....	161
Annex 3.2.	Baseline projections .....	175
Annex 3.3.	Estimation of the number of problematic traineeships.....	176
Annex 3.4.	Traineeships of long duration, including consecutive traineeships .....	178
Annex 3.5.	Methods to estimate the costs of the policy options .....	179
Annex 3.6.	Detailed approach and methodology for stakeholders consultations.....	187
Annex 3.7.	Legal analysis .....	206
Annex 3.8.	Vacancy analysis.....	218
<b>ANNEX 4.</b>	<b>CONCLUSIONS OF THE EVALUATION AND LINK TO THE STUDY ....</b>	<b>220</b>

## Figures

Figure 1: Categories of traineeships .....	5
Figure 2: Stock of paid trainees in the EU27 .....	9
Figure 3: Composition of paid traineeships by type of traineeship, 2006-2021 .....	9
Figure 4: Prevalence rates – paid trainees and apprentices in the EU27, 2006-2021 ..	10
Figure 5: Paid and unpaid trainees in the EU - estimates using the EU-LFS .....	11
Figure 6: Employment and traineeships during the Covid-19 pandemic.....	16
Figure 7: Problem tree.....	18
Figure 8: Share of individuals whose last traineeship lasted more than 6 months .....	21
Figure 9: Share of traineeships lasting longer than six months by type.....	22
Figure 10: Share of trainees whose traineeship lasted longer than six months.....	22
Figure 11: Trainees' share with more than one traineeship with the same employer....	23
Figure 12: Traineeships lasting more than 6 months and usefulness to find a job .....	24
Figure 13: Access to social protection during the last traineeship (%).....	26
Figure 14: Trainees' working conditions compared to employees .....	26
Figure 15: Mentorship during the traineeship - Eurobarometer 2023 results.....	27
Figure 16: Perception of access for vulnerable groups to traineeship opportunities .....	29
Figure 17: Access to necessary equipment to carry tasks remotely .....	31
Figure 18: Adequate guidance/mentoring to carry tasks remotely .....	31
Figure 19: EU youth unemployment (15-29) and total unemployment rates (%).....	37
Figure 20: Information to be included in vacancy notice .....	53
Figure 21: Reasons not to have had a traineeship .....	54
Figure 22: Access to adapted equipments for trainees with disabilities.....	55
Figure 23: Reasons not to have had a cross border traineeship.....	56
Figure 24: Intervention logic.....	70
Figure 25: Eurobarometer 2023 results – pay or financial compensation.....	94
Figure 26: Ecorys (2023) proxy - 21 MS .....	94
Figure 27: trainees and usefulness of traineeships to find a job .....	96
Figure 28: Unpaid trainees and usefulness of traineeships to find a job.....	96
Figure 29: Paid trainees in the EU27, by gender.....	99
Figure 30: Gender composition of trainees by type of traineeship in the EU27.....	100
Figure 31: Paid trainees in the EU27, disaggregated by age.....	101
Figure 32: Age composition of trainees by type of traineeship in the EU27 .....	102
Figure 33: Paid trainees in the EU27, disaggregated by level of education .....	103
Figure 34: Educational composition of trainees by type of traineeship in the EU27 ....	104
Figure 35: Paid trainees in the EU27, disaggregated by citizenship .....	105
Figure 36: Trainees' composition by traineeship type and citizenship in the EU27 .....	106
Figure 37: Paid trainees in the EU27, disaggregated by degree of urbanisation .....	107
Figure 38: Composition of trainees by type and degree of urbanisation in the EU27 .	108
Figure 39: Prevalence rates in the EU27 by sector .....	109
Figure 40: Sectoral composition for trainees and employees in the EU27 .....	110
Figure 41: Sectoral composition of traineeships by type in the EU27.....	111
Figure 42: Gender sectoral composition for trainees and employees in the EU27.....	112
Figure 43: Paid trainees in the EU27 by occupation .....	113
Figure 44: Occupational composition for trainees and employees in the EU27 .....	114
Figure 45: Occupational composition of traineeships by type in the EU27 .....	115
Figure 46: Paid traineeships by firm size in the EU27 .....	116

Figure 47: Traineeship composition by traineeship type and size of firm in the EU27	116
Figure 48: Size of the hosting company or organization, Eurobarometer 2023	117
Figure 49: firm size for paid and unpaid traineeships, Eurobarometer 2023	117
Figure 50: Vacancies by country	121
Figure 51: Distribution of stakeholder categories	148
Figure 52: Benefits of having trainees	149
Figure 53: Stocks of paid trainees for each iteration of the procedure - EU27	166
Figure 54: Trace plots from 100 burn-in iterations – imputed variables' means	167
Figure 55: Stocks of current tertiary students in the EU27 - LFS and UOE	172

## Tables

Table 1: Procedures for registering complaints and reporting malpractice	40
Table 2: Existence of systems of inspections or guidance for inspectorates	41
Table 3: Legal requirements on the maximum duration of traineeships	43
Table 4: Restrictions on Consecutive Traineeships	44
Table 5: Clarity in traineeship's conditions for termination, extension or renewal	45
Table 6: Existence of a cap on the share of trainees in a company	45
Table 7: Existence of general obligation for trainees' remuneration/compensation	47
Table 8: Access to social protection by Member State and type of traineeship	50
Table 9: Legal provisions regarding written agreement and written information	51
Table 10: Legal provisions on the provision of a supervisor and/or mentor	52
Table 11: Legal analysis - existence of teleworking arrangements	56
Table 12: Projected trends by type of traineeship in the EU27 (thousands)	61
Table 13: Long duration and prior work experience requirements (thousands)	75
Table 14: Costs of new labour inspectors and training under three scenarios	78
Table 15: Suggested monitoring indicators by objective	91
Table 16: NACE classification aggregated	92
Table 17: ISCO classification aggregated	93
Table 18: paid, unpaid and total number of trainees - All types - 2016 and 2019	94
Table 19: paid, unpaid and total number of trainees - MPT - 2016 and 2019	95
Table 20: paid, unpaid and total number of trainees - ECT - 2016 and 2019	95
Table 21: paid, unpaid and total number of trainees - ALMP - 2016 and 2019	95
Table 22: paid, unpaid and total number of trainees - OMT - 2016 and 2019	95
Table 23: Logit estimation results	97
Table 24: Share of trainees and employees by urbanisation (2016-2019 averages)	107
Table 25: Composition of trainees by gender, Eurobarometer 2023 (%)	118
Table 26: Composition of trainees by age, Eurobarometer 2023 (%)	118
Table 27: Composition of trainees by level of education, Eurobarometer 2023 (%)	119
Table 28: Composition of trainees by level of urbanisation, Eurobarometer 2023 (%)	120
Table 29: Overview level of experience in traineeship vacancies	121
Table 30: Distribution of level of experience across countries(number of vacancies)	122
Table 31: Employee status under national law, by country and type of traineeship	124
Table 32: Legal provisions on status and remuneration - ALMP	124
Table 33: Legal provisions on status and remuneration - OMT	127
Table 34: Legal provisions on status and remuneration - MPT	129
Table 35: Legal provisions on status and remuneration - ECT	134
Table 36: Restrictions on consecutive traineeships and duration - ALMP	141
Table 37: Restrictions on consecutive traineeships and duration - OMT	143



**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

Table 38: Restrictions on consecutive traineeships and duration - MPT .....	144
Table 39: Restrictions on consecutive traineeships and duration - ECT.....	146
Table 40: Imputed variables .....	163
Table 41: ISCO 3-digits occupations for MPT .....	168
Table 42: Average yearly growth rate 2014-2019 by (un)paid traineeship type .....	175
Table 43: Historical and projected number of trainees in the EU (in thousand) .....	176
Table 44: Survey questions used to assess problematic traineeship .....	177
Table 45: Estimated number of problematic traineeships in the EU, 2019 .....	178
Table 46: Unit cost per person for familiarisation with new EU legislation.....	179
Table 47: Aggregate familiarisation costs .....	180
Table 48: Aggregated costs from extending social security to all trainees .....	181
Table 49: Costs of transparency of vacancies .....	182
Table 50: Estimated costs of traineeships specific training for labour inspectors.....	182
Table 51: Labour inspectors and training costs - high bound scenario.....	183
Table 52: Labour inspectors and training costs under - intermediate scenario .....	183
Table 53: Estimated recruitment costs by traineeship type .....	184
Table 54: Costs of issuing a written traineeship agreement.....	184
Table 55: Estimates of trainees' remuneration in the EU MS.....	185
Table 56: Total costs of measure on fair remuneration .....	187
Table 57: Summary of EU-level interviews .....	188
Table 58: Studies mapping or assessing national frameworks for traineeships .....	206
Table 59: Overview EURES vacancies by type, on 30/10/2023 .....	219

## Boxes

Box 1: German cases against employers misusing a traineeship* .....	20
Box 2: Reporting mechanisms in Austria .....	79

## List of acronyms and abbreviations

Acronym/Abbreviation	Explanation
ALMP	Active Labour Market Policies
CBA	Collective Bargaining Agreements
EC	European Commission
ECT	Education Curricula Traineeships
EP	European Parliament
EU	European Union
FE	Flash Eurobarometer

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

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IA	Impact Assessments
GDPR	General Data Protection Regulation
LFS	Labour Force Survey
MPT	Mandatory Professional Traineeships
MS	Member States
MW	Minimum Wage
NEET	Young people neither in Employment nor Education or Training
OMT	Open Market Traineeships
PA	Public Authorities
PES	Public Employment Services
QFT	Quality Framework for Traineeships
TP	Traineeship Providers
YG	Youth Guarantee

## Abstract

This study was conducted to support the impact assessment of a new EU-level initiative aimed at enhancing the quality, inclusiveness, and accessibility of traineeships. Three primary issues were identified: i) the problematic use of traineeships, ii) poor-quality traineeships, and iii) unequal access to traineeships. Given the breadth of these issues, policy options on the following aspects were identified : i) Measures aimed at identifying, preventing, and addressing the problematic use of traineeships. This involves establishing a list of elements for competent authorities to consider when determining problematic traineeships, setting a maximum duration of six months, obligations for vacancies to include relevant information, and ensuring targeted controls and inspections, among others. ii) Measures aimed at enhancing working conditions, such as ensuring fair remuneration/compensation, guidance to ensure access to social security, and requiring detailed written traineeship agreements. iii) Measures aimed at improving access to traineeships. These include non-binding measures targeting vulnerable groups to ensure accessibility for persons with disabilities and promote inclusiveness through outreach activities. Additionally, non-binding instrument or guidance is provided to enhance cross-border traineeships within the EU and for mobility outside the EU, aiming to promote respect for the QFT. Non-binding instrument or guidance is further offered to facilitate and improve remote and hybrid traineeships, including access to digital work tools. These measures are supplemented by accompanying actions to ensure effective involvement of social partners, improve monitoring and data collection, raise awareness, and support employers - particularly small and micro-enterprises - in providing high-quality traineeships.

## Executive summary

Today, the Council Recommendation on a Quality Framework for Traineeships approved in 2014 (hereafter “2014 QFT”), which proposes a series of quality criteria for traineeships (specifically, open market and active labour market policies traineeships), constitutes the main reference in the EU on traineeships.

The 2023 evaluation of the 2014 QFT and the 2023 Eurobarometer survey both point to improved quality of traineeships across the EU since 2014, after the adoption of the Recommendation. However, concerns persist regarding trainees' working conditions, which have not been adequately addressed by national legislation, and the significant variations across Member States and types of traineeships. Furthermore, while traineeships are increasingly recognised as a critical step to increase employability, for young people in particular, a growing number of reports pointing to unfair practices as well as court cases of abusive practices have raised media attention and political concerns about the existing national frameworks governing traineeships and what the EU can do.

This study has the objective of supporting the impact assessment of a new EU-level initiative aiming to improve quality, inclusiveness, and access to traineeships.

## Prevalence of traineeships in the EU

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’<sup>1</sup>. Four main types of traineeships are identified:

- **Open market traineeships (OMT)**: take place under an agreement between the employer and the trainee. They aim to provide trainees with a first work experience through learning and training on the job.
- **Active Labour Market Policy traineeships (ALMP)**: involve an agreement between three stakeholders – employer, trainee, and public employment service – without necessarily requiring a work contract and remuneration. These traineeships target unemployed/inactive young individuals and aim to smooth their transition to work.
- **Education curricula traineeships (ECT)**: are part of curricula of formal education (school, vocational, or higher education and training).
- **Mandatory professional traineeships (MPT)**: traineeships whose content is regulated under national law and whose completion is a mandatory requirement for trainees to access a specific profession (e.g. doctors, lawyers, professional accountants).

Based on data from the EU LFS, the study estimates that in 2019 the stock of paid trainees in the EU amounted to about 1.6 million, of which 24% in OMT, 36% in ALMP, 31% in ECT, and 9% in MPT. The estimated number of unpaid trainees for the same year was just below 1.5 million individuals. This implies that the estimated total stock of trainees was about 3 million, of which 52% were paid and the remainder unpaid.

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<sup>1</sup> Council (2014). Council Recommendation of 10 March 2014 on a Quality Framework for Traineeships (2014/C 88/01).

**Paid traineeships** predominantly involve young individuals, with approximately 80% below the age of 30. They are slightly more likely to be male (in 2019 it was 51% vs 49% women) and possess a high level of education, with over 85% having completed at least higher secondary education. Moreover, they tend to reside in urban areas, with more than 40% living in cities and typically undertaking their traineeships in service or high-skilled occupations rather than manual ones. Paid traineeships are more commonly found in the service sector and larger firms, with more than 40% of trainees being occupied in (relatively few) medium to large firms. These features are even more pronounced in MPT, ECT and OMT. By contrast, ALMP traineeships present a higher prevalence of trainees from more disadvantaged backgrounds and more traineeships in industrial sectors or small firms. In 2019, Germany, Spain, France, Italy and Poland, the five largest countries, accounted for more than 80% of the overall stock of paid trainees.

Based on information extrapolated from the Flash Eurobarometer of 2023, EU **unpaid trainees** are on average younger than paid trainees, and a slight majority of them are women. Similarly to paid trainees, unpaid trainees are generally highly educated, with the majority having completed either post-secondary non-tertiary education or tertiary education. Across the EU27, the largest share of unpaid trainees comes from small or medium towns, or large towns/cities.

In general, differences between the four types of traineeships tend to reflect the "structural" characteristics of traineeships. For instance, MPTs and ECTs always require a higher level of education. MPTs usually take place after a university degree and ECT during enrolment in tertiary education (though not only). By contrast, as unemployed individuals constitute the main target of ALMP, trainees under ALMP tend to be less educated and belong to disadvantaged groups.

## What is the problem with traineeships?

Three main issues have been identified around traineeships: i) the problematic use of traineeships, ii) poor-quality traineeships and iii) unequal access to traineeships.

As different regulatory regimes are applied to different traineeships in different countries, fragmented and often unclear regulatory frameworks in the Member States have made the EU traineeship landscape complex to understand and susceptible to abuse.

The first problem identified concerns the problematic use of traineeships. While there is no universally accepted operational definition of what constitutes a problematic traineeship, for the purposes of this study, it encompasses instances where regular employee positions are disguised as traineeships, as well as cases where the trainee is considered a worker but the employer fails to meet the legal standards mandated by labour law or collective agreements. Detecting and documenting such cases without the intervention of a court can be challenging. However, the 2014 QFT offers guidance by delineating the hallmarks of "genuine" traineeships, including limited duration, a structured learning component, and their role in fostering experiential learning for labour market integration. Leveraging these principles, along with insights from existing literature and case law, several concurrent elements can serve as indicators of problematic traineeships. These are: i) excessively long duration or consecutive traineeships with the same provider; ii) lack of a structured learning/training component; iii) trainees performing activities with the same intensity as a regular employee and/or having similar responsibilities; iv) trainees already possessing experience from previous traineeships or regular job positions; and v) high ratio of traineeships compared with regular employment within one organisation.

Evidence suggests that, to a different degree across Member States and types of traineeships, those elements exist and problematic use of traineeships is a reality. In the EU, on average, more than 10% of traineeships are longer than 6 months and multiple

traineeships with the same provider are widespread (on average 40% of surveyed trainees). Different stakeholders report practices in which trainees are assigned tasks and workloads comparable to regular employees and are required to have previous experience in order to be selected.

The second problem, i.e. poor-quality traineeships, relates to the quality of two defining aspects of the traineeship: working conditions and the learning component. It is a fact that about half of traineeships are not paid, and, based on surveys, more than a quarter of trainees claims not to have had access to any branch of social security. Furthermore, on average, more than 20% of trainees claim that what they learnt during their traineeships was not professionally useful.

Third, access to traineeships, especially high-quality traineeships, including cross-border traineeships, may be limited for individuals from vulnerable groups, especially in the case of unpaid traineeships. Remote and hybrid traineeships, to which access could be easier for certain groups, particularly for individuals from disadvantaged groups, face challenges in ensuring sufficient quality of traineeships, especially in terms of learning content.

Challenges arising from complexity in national regulatory approaches regarding the legal status of trainees, insufficient enforcement and lack of capacity for controls and inspections, as well as the weak position of trainees, relative to providers, are among the most important drivers of the problems. Various external factors, like changes in the labour market driven by the green and digital transition, the shrinking working age population, the rise of remote and hybrid working arrangements as well as emerging phenomena like 'job-hopping' have also contributed to the problem.

## Why should the EU act?

Persisting concerns about limited compliance with the 2014 QFT principles and the inadequacy of national legislation in several Member States to address trainees' working conditions, coupled with significant variation across Member States and types of traineeships necessitate consideration of EU action. In addition, in recent years, mounting concerns about the problematic use of traineeships (in particular the so-called "bogus traineeships", i.e. a traineeship replacing a regular employment contract) have been voiced by various stakeholders, including youth organisations and trade unions. These concerns have been echoed by the Members of the European Parliament who have called for new rules to avoid the exploitation of trainees across the EU. Furthermore, new evidence gathered in this study suggests that the regulatory landscape is not only extremely complex due to differences across Member States and types of traineeships, but also that the lack of clarity in many respects leads to legal uncertainty and ad hoc practices, resulting in suboptimal outcomes (such as problematic use of and poor quality traineeships). These factors underscore the need for EU action to address these issues and future challenges.

## Methodological approach

The study followed the Better Regulation Guidelines and Toolbox in its operationalisation of research questions and the development of its methodological approach. After answering the questions about the problem of why should the EU act, research activities focused on i) What policy should achieve? ii) What are the various options to achieve the objectives? iii) What are the impacts of the different policy options, and who will be affected?

A diverse set of methodological approaches were employed for data collection and analysis. Data collection was carried out by applying a qualitative approach, resulting in a

rich depository of data, whereas advanced statistical and econometric methods were used to estimate the prevalence of the problem and the impacts of the various policy options. Overall the approach included:

- A wide and exhaustive review of the relevant literature and existing data sources, including academic and grey literature, earlier surveys, national statistics, and other relevant information.
- A broad review of national policies and measures implemented in the areas of traineeships in the EU-27 Member States, including a detailed legal analysis at the country level
- An online survey targeting national public authorities, national business/employer associations, businesses (traineeship providers), national trade unions, national youth organisations, civil society organisations and educational institutions
- A set of semi-structured interviews targeting social partners and other stakeholders at EU level
- Advanced empirical analysis using the EU Labour Force Survey to estimate the prevalence and key characteristics of traineeships

## Policy objectives

The study identified that the general objective of a potential new EU initiative in this domain could be to improve the use, quality, inclusiveness and access to traineeships. The specific objectives would be to 1) Determine, prevent, and combat the problematic use of traineeships; 2) Improve working conditions and the training element of traineeships; and 3) Improve inclusiveness and access to high-quality traineeships.

## Policy options

The policy options assessed in this report aim to address the three problems and three specific objectives identified. The policy options can be binding for trainees considered workers under EU law (i.e. paid trainees) and non-binding for other trainees (i.e. unpaid trainees) except in specified cases.

### **Policy options addressing the problematic use of traineeships (Policy area 1) included:**

- **Measures to determine problematic traineeships**, including Member States to determine problematic traineeships (P.1.1.1), or a list of elements defined by the European Commission to be taken into consideration by competent authorities to determine problematic traineeships (P.1.1.2).
- **Measures to prevent problematic traineeships**, including setting the maximum total duration of traineeships with the same employer to six months, except in duly justified cases (P.1.2.1), ensuring that employers do not require candidates for traineeships to have previous working experience in the field of activity (P.1.2.2). and an obligation to employers to provide, in the vacancy notices, information on the expected tasks, learning content, working conditions, remuneration and social protection (P.1.2.3).
- **Measures to strengthen inspections and enforcement**, including for Member States to ensure effective targeted controls and inspections and take enforcement measures to address problematic traineeships (P.1.3.1) and to ensure the provision of human, technical and financial resources to competent authorities to perform effective controls and inspections (P.1.3.2).

- **Supporting measures for trainees**, including creating or using existing channels for reporting malpractice and poor traineeship conditions during and after the traineeship period (P.1.4.1) and ensuring the possibility for workers representatives (and possibly other actors with a legitimate interest) to engage in procedures to enforce the rights of trainees (P.1.4.2).

**Policy options addressing the poor quality of traineeships (Policy area 2) included:**

- **Measures on working conditions, including remuneration and access to social protection for trainees**, namely ensuring fair/ proportionate remuneration/ compensation for trainees (P.2.1.1) and non-binding instrument or guidance to ensure that trainees have access to social protection (P.2.1.2).
- **Measures to improve transparency on working conditions of trainees and the learning component**, including an obligation to employers to provide all trainees with individual written information on the learning objectives and content of the traineeship, including information on supervision, mentorship and evaluation (P.2.2.1) or an obligation to employers to provide a written traineeship agreement, including for example the expected tasks, learning content (including information on supervision, mentorship and evaluation), working conditions, remuneration and social protection (P.2.2.2).

**Policy options addressing the unequal access to quality of traineeships (Policy area 3) included:**

- **Non-binding instrument or guidance to improve access to traineeships for vulnerable groups**, including to ensure the accessibility of persons with disabilities with accessible workplace (P.3.1.1) and to ensure inclusiveness of traineeships to all vulnerable groups with outreach activities (P.3.1.2).
- **Non-binding instrument or guidance on improving cross-border traineeships**, including 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 to reduce administrative formalities (P.3.2.1), to make use of the EURES network and exchange information on paid traineeships through the EURES portal (P.3.2.2), to develop with the EURES European Coordination Office (within the European Labour Authority) practical guidance material and information for (potential) trainees on cross-border traineeships (P.3.2.3), and in case of mobility outside the European Union, promote respect for the QFT, where applicable, in agreements between educational institutions and traineeship providers (P.3.2.4).
- **Non-binding instrument or guidance to facilitate and improve remote and hybrid traineeships** including with the access to digital work tools (P.3.3).

All the policy measures can be introduced in combination with accompanying measures such as monitoring of data on traineeships, involvement of social partners and stakeholders, awareness raising and support to employers (in particular SMEs) to provide quality traineeships.

## Impacts of the policy options

### The baseline scenario

Linear trend projections suggest that by 2030 the total number of trainees in Europe may increase by 16% compared to its level in 2021, driven mainly by the increase in paid



traineeships (by 36%) and a small increase (by 5%) of unpaid traineeships. The largest growth in relative terms is expected in MPT and ALMP, followed by ECT and OMT. The drivers of the problematic use of traineeships are expected to persist in the absence of policy intervention. Despite recent improvements, the diversity and complexity of national legal frameworks for traineeships between and within Member States are likely to remain. The number of trainees under excessively long traineeships, including trainees doing consecutive traineeships with the same employer, is likely to remain high for all types of traineeships. Except for ALMP, monitoring and control mechanisms for traineeships may continue to be missing in several countries and, their effectiveness will likely still be hindered by the limited resources of labour inspectorates.

As the QFT Recommendation remains the main framework for traineeship standards in the EU, ECT and MPT would continue to be uncovered. Some recent initiatives<sup>2</sup> would improve the conditions for trainees considered workers under EU law, however the other trainees (unpaid) not considered workers would continue to suffer from poor working conditions. The persistence of fraudulent practices and limited access to remuneration and social protection for some trainees are likely to maintain existing inequalities in accessibility to traineeship opportunities. Despite an increasing trend in the prevalence of cross-border traineeships, barriers connected to lack of financial resources, interest of trainees, information as well as differences in the national legislative frameworks for traineeships represent an obstacle to increasing trainees' cross-border mobility.

### **Policy area 1 – Policy options addressing the problematic use of traineeships**

The measures to combat problematic traineeships could benefit more than 370,000 paid trainees who did a traineeship longer than six months, out of which 100,000 trainees did a long duration traineeship with poor learning content. The measure to ensure that no prior experience is required for a traineeship could impact 1.1 million trainees (paid and unpaid) who have conducted multiple traineeships.

In terms of **social impacts**, the decline of abusive practices would improve the well-being and working conditions of trainees. Traineeship providers would also benefit from a better working environment where employees and trainees are more satisfied, and of reputation gains to attract new trainees. Limiting the duration of traineeships to six months and not requiring previous experience would enhance the employability of young individuals.

As regards the **economic impacts**, for trainees, the decline of problematic traineeships could improve productivity and facilitate the transition to the labour market. For employers, the appropriate use of traineeship schemes could increase businesses' competitiveness and would lead to fairer market competition. Traineeship relations that are transformed into working relations would increase the labour costs for traineeship providers that were offering problematic traineeships, due to potential increases in remuneration and social security expenditures. Besides familiarisation costs with the new measures, the required transparency on working conditions and learning content in the vacancies would incur total annual costs estimated between EUR 15 million and EUR 46 million depending on the level of implementation across Member States. The six-month duration limit could incur recruitment costs for employers of up to EUR 68 million across the EU. For public authorities, the measures would make it easier to detect cases of misuse of traineeships. Public authorities would incur transposition and enforcement costs ranging between EUR 27 000 to 1.2 million depending on the current capacity of labour inspectorates. Over time, enforcement costs could decline with the decrease in fraudulent traineeships.

Concerning **fundamental rights**, the initiatives support the right to fair working conditions.

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<sup>2</sup> Directive 2019/1152 on Transparent and Predictable Working Conditions, Recommendation 2019/C 387/01 on access to social protection for workers and the self-employed, Directive 2022/2041 on adequate minimum wages in the European Union.

## Policy area 2 – Policy options addressing the poor quality of traineeships

In terms of **social impacts**, receiving fair remuneration and access to social protection and providing this information in a written statement would improve the working conditions of trainees and could make traineeships more accessible, improving social mobility. More than 1 million trainees currently without social protection could be affected by the measure on access to social protection. The increase in the number of trainees supported by social security schemes can be expected to reduce the precariousness of young people and their risk of poverty. For traineeship providers, these measures could improve the working environment, make traineeships more attractive and increase the retention of talents.

Regarding the **economic impacts**, for trainees, these interventions would guarantee direct economic benefits connected to receiving fair compensation and social protection. For traineeship providers, these measures could improve trainees' motivation and productivity, increase their retention and decrease recruitment costs. At the same time, traineeship providers who currently offer traineeships with unfair remuneration levels are expected to incur labour costs ranging from EUR 731 million to EUR 2.3 billion over the EU<sup>3</sup>. Providing access to social protection could incur additional costs for traineeship providers ranging from EUR 2.8 billion to EUR 8.4 billion at EU level depending on the level of implementation by Member States. These costs could disincentivize SMEs to recruit trainees, leading to a decline in the overall demand for trainees. In addition, the aggregate additional costs connected to introducing a written statement agreement at EU level could range from EUR 27 million to EUR 80 million depending on the level of implementation by Member States. For public authorities, an increase in the number of trainees remunerated and with social protection access could produce a positive impact on the tax revenues and the level of social security contributions. Despite transposition and enforcement costs, these policy measures are expected to reduce public expenditure on last-resort safety nets (such as social assistance) by supporting the integration of young people, especially those in vulnerable situations, into the labour market.

Concerning **fundamental rights**, the policy measures would contribute to ensuring the right to fair working conditions, access to adequate social protection and healthcare.

## Policy area 3 – Policy options addressing the unequal access to quality traineeships

In terms of **social impacts**, the measures on accessibility contribute to ensuring that individuals with disabilities and from vulnerable backgrounds can acquire work experience, which increases their employability. Measures to facilitate cross-border and remote/hybrid traineeships can increase the number of traineeship opportunities, and trainees can benefit from additional skills with international experience. Traineeship providers can have access to a wider pool of talents and a more diverse workforce, which could contribute to creating a positive image of the organisation, both among staff and clients.

Regarding the **economic impacts**, on trainees, measures to improve traineeship accessibility contribute to increasing traineeship opportunities and labour market prospects for young people in vulnerable situations, increasing possibilities for social mobility. Traineeship providers could benefit from productivity increases. Beside costs to familiarise with the legislation, they would sustain some limited adjustment costs to conduct outreach activities towards vulnerable groups, adapt the workplace for trainees with disabilities, provide digital work tools for remote traineeships, and to post vacancies to recruit international trainees. For public authorities, beside enforcement costs, the measures increasing the employability of vulnerable groups could lead to a decline in public expenditure in the last resort safety nets.

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<sup>3</sup> Depending on the assumptions on the number of trainees affected, the level of pay corresponding to fair remuneration and the degree of implementation of the initiative by Member States.

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

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Concerning **fundamental rights**, these measures would contribute to ensuring the right to equal opportunities and treatment of under-represented groups, non-discrimination, the freedom of movement and the right to family life.

## Rapport de synthèse

La Recommandation du Conseil relative à un cadre de qualité pour les stages, approuvée en 2014 (ci-après « QFT 2014 » ou simplement « QFT »), propose une série de critères afin de garantir la qualité des stages en entreprise (notamment, les stages sur le marché dit « ouvert » et les stages dans le cadre de politiques actives du marché du travail). A ce jour, le QFT constitue la principale référence de l'Union Européenne (UE) sur ce sujet.

L'évaluation du QFT en 2023 et l'enquête « Eurobarometer » 2023 sur les stages dans l'UE indiquent une amélioration de la qualité des stages sur la période 2014-2023, après l'adoption de la Recommandation. Malgré ces avancées, des préoccupations subsistent, notamment en ce qui concerne les conditions de travail des stagiaires. Le QFT 2014 contient des principes en ce sens mais ceux-ci ne semblent pas avoir été (suffisamment) pris en compte et intégrés dans le corpus législatif des Etats membres. De manière générale, l'évaluation du QFT 2014 fait apparaître une certaine persistance des différences législatives entre États membres concernant les (différents types de) stages. De plus, alors que les stages sont de plus en plus reconnus comme une étape cruciale pour accroître l'employabilité, des jeunes en particulier, un nombre croissant de rapports fait état de pratiques injustes. Certaines affaires judiciaires, se rapportant à ces pratiques, ont attiré l'attention des médias et suscité des préoccupations politiques concernant les cadres nationaux existants et régissant les stages, ainsi que sur les marges de manœuvres de l'UE.

Cette étude soutient l'analyse d'impact d'une nouvelle initiative de l'UE visant à améliorer la qualité, l'inclusivité et l'accès aux stages.

## Prévalence des stages dans l'UE

Les stages sont définis comme une « période limitée de pratique professionnelle, rémunérée ou non, comprenant un volet de formation, afin d'acquérir une expérience pratique et professionnelle en vue d'améliorer l'employabilité et de faciliter la transition vers un emploi régulier et stable »<sup>4</sup>. Quatre types principaux de stages sont identifiés :

- **Stages sur le marché dit ouvert** (Open Market Traineeships ou OMT) : ont lieu dans le cadre d'un accord entre l'employeur et le stagiaire. Ils visent à fournir aux stagiaires une première expérience de travail en apprenant et se formant par la pratique en milieu professionnel.
- **Stages dans le cadre de politiques actives du marché du travail** (stage Active Labour Market Policy ou stage ALMP) : résultent d'un accord tripartite - entre l'employeur, le stagiaire et le service public de l'emploi - sans nécessiter nécessairement de contrat de travail et de rémunération. Ces stages ciblent les jeunes chômeurs/inactifs et visent à faciliter leur transition ou réinsertion sur le marché du travail.
- **Stages dans le cadre de programmes éducatifs** (Education Curricula Traineeship ou ECT) : font partie des programmes d'enseignement secondaire, post-secondaire ou universitaire.
- **Stages professionnels obligatoires** (Mandatory Professional Traineeships ou MPT) : des stages dont le contenu est réglementé par la législation nationale et

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4 Conseil (2014). Recommandation du Conseil relative à un cadre de qualité pour les stages (2014/C 88/01).

dont la finalisation est une condition requise pour que les stagiaires accèdent à certaines professions (par exemple, médecins, avocats, experts-comptables).

Sur la base des données de l'Enquête sur les forces de travail de l'UE, cette étude estime qu'en 2019, le nombre de **stagiaires rémunérés** dans l'UE s'élevait à environ 1,6 million, dont 24% en OMT, 36% en stage ALMP, 31% en ECT et 9% en MPT. Le nombre estimé de stagiaires non rémunérés pour la même année était légèrement inférieur à 1,5 million de personnes. Cela implique que le nombre total estimé de stagiaires était d'environ 3 millions, dont 52% étaient rémunérés.

Les stages rémunérés concernent principalement les jeunes, environ 80% des stagiaires ont moins de 30 ans. Les stagiaires sont légèrement plus susceptibles d'être des hommes (51% d'hommes en 2019) et possèdent un niveau moyen d'éducation élevé, plus de 85% ayant terminé au moins un cursus d'étude secondaire. De plus, les stagiaires résident plus fréquemment dans les zones urbaines, plus de 40% habitant dans des villes, et ils effectuent généralement leurs stages dans des professions hautement qualifiées. Les stages rémunérés sont également plus fréquents dans le secteur des services et dans les grandes entreprises, avec plus de 40% des stagiaires effectuant leurs stages dans des entreprises de taille moyennes à grandes. Ces caractéristiques sont encore plus prononcées pour les MPT, ECT et OMT. En revanche, les stages ALMP présentent une prévalence plus élevée de stagiaires issus de milieux défavorisés. Ces stages se déroulent également plus souvent dans le secteur industriel et dans des petites entreprises. En 2019, l'Allemagne, l'Espagne, la France, l'Italie et la Pologne, les cinq plus grands pays de l'UE en termes de population, représentaient plus de 80% du nombre total de stagiaires rémunérés.

Sur la base d'informations extrapolées de l'Enquête « Flash Eurobaromètre » de 2023, les **stagiaires non rémunérés** de l'UE sont en moyenne plus jeunes que les stagiaires rémunérés, et une légère majorité d'entre eux sont des femmes. Tout comme les stagiaires rémunérés, les stagiaires non-rémunérés sont généralement très éduqués, la majorité possédant un niveau d'éducation au moins égal au niveau secondaire. Dans les 27 États membres de l'UE, la plus grande part des stagiaires non rémunérés résident dans un milieu urbain (petites, moyennes ou grandes villes).

En général, les différences entre les quatre types de stages tendent à refléter les caractéristiques "structurelles" de ces stages. Par exemple, les MPT et les ECT requièrent nécessairement un niveau d'éducation plus élevé. Les MPT ont généralement lieu après la validation d'un diplôme universitaire et les ECT prennent souvent place durant la formation dans l'enseignement supérieur (bien que pas seulement). En revanche, comme les personnes sans emploi constituent la cible principale des stages ALMP, ces stagiaires tendent à être moins éduqués et à appartenir à des groupes plus défavorisés sur le marché du travail.

## Quel est le problème avec les stages ?

Trois problèmes principaux ont été identifiés concernant les stages : i) les stages utilisés de manière problématique, ii) les stages de mauvaise qualité et, iii) l'accès inégal aux stages.

Différents régimes réglementaires sont d'application en fonction du type de stages dans les États Membres. Cette fragmentation des cadres réglementaires est source de confusion et contribue à rendre le paysage des stages dans l'UE complexe à appréhender tout en le rendant plus susceptible à certaines formes d'abus.

Le premier problème identifié concerne l'utilisation problématique des stages. Il n'existe pas de définition concrète et universellement acceptée de ce qui pourrait constituer un

stage problématique, et cette étude développe un cadre conceptuel qui englobe les cas où des postes d'employés « réguliers » sont déguisés (substitués) en stages, ainsi que les cas où le stagiaire est considéré comme un travailleur (au niveau européen) mais l'employeur ne respecte pas les normes légales prescrites par le droit du travail ou les conventions collectives. Détecter et documenter de tels cas sans intervention judiciaire constitue une tâche difficile pouvant également se montrer hasardeuse. Cependant, le QFT 2014 offre des pistes de réflexion puisqu'il identifie et délimite les caractéristiques distinctives des stages « véritables ». Ces caractéristiques incluent notamment une durée de stage limitée et un volet de formation structuré qui doit permettre et faciliter l'intégration sur le marché du travail. En s'appuyant sur ces principes, ainsi que sur la littérature (académique) existante et la jurisprudence, plusieurs éléments concomitants peuvent servir d'indicateurs pour identifier les stages problématiques. Ceux-ci sont : i) une durée excessivement longue ou des stages consécutifs avec le même employeur ; ii) l'absence d'un volet formation structuré ; iii) les stagiaires effectuent des activités/tâches avec la même intensité qu'un employé et/ou possèdent des responsabilités similaires ; iv) les stagiaires possèdent déjà une expérience pertinente suite à un ou plusieurs stages ou postes d'employés couvrant les mêmes fonctions ; et v) un ratio élevé de stagiaires par rapport au nombre d'employé au sein d'un établissement.

Les éléments de preuve recueillis suggèrent que, à différents degrés selon les États membres et les types de stages, l'utilisation problématique des stages est une réalité. Dans l'UE en moyenne, plus de 10% des stages durent plus de six mois et la pratique des stages multiples avec le même employeur est répandue (40% des stagiaires interrogés selon l'enquête « Eurobarometer » 2023). Différents acteurs signalent des pratiques telles que des stagiaires se voyant confier des tâches et des charges de travail comparables à celles d'employés et étant tenus d'avoir une expérience antérieure pour être sélectionnés.

Le deuxième problème concerne les stages de mauvaise qualité et se concentre autour de deux aspects déterminants du stage : les conditions de travail et le volet de formation. Dans les faits, près de la moitié des stages ne sont pas rémunérés, et, selon certaines enquêtes, plus d'un quart des stagiaires affirme n'être couvert par aucune branche de la sécurité sociale. En outre, plus de 20% des stagiaires déclarent que ce qu'ils ont appris lors de leurs stages ne sera pas utile sur le plan professionnel.

Troisièmement, l'accès aux stages, en particulier aux stages de haute qualité, y compris les stages transfrontaliers, peut être limité pour les personnes issues de groupes vulnérables. Les stages à distance et hybrides, qui pourraient faciliter l'accès aux stages pour certains groupes (défavorisés), sont sujets à des contraintes afin de garantir la qualité de ces expériences, en particulier en termes de contenu formatif.

Les défis découlant de la complexité des approches réglementaires nationales concernant le statut juridique des stagiaires, de l'insuffisance et du manque de capacité de contrôle et d'inspection, ainsi que de la position défavorable des stagiaires par rapport aux employeurs, figurent parmi les principaux moteurs des problèmes identifiés par cette étude. Divers facteurs externes, tels que les changements structurels sur le marché du travail liés à la transition écologique et numérique, le vieillissement de la population en âge de travailler, l'essor du travail à distance et hybride ou certains phénomènes émergents tels que le « job-hopping », contribuent également à entretenir et renforcer les problèmes liés aux stages.

## Pourquoi l'UE devrait-elle agir ?

Les préoccupations persistantes concernant le respect limité des principes du QFT 2014, l'inadéquation des cadres réglementaires nationaux dans plusieurs États membres pour faire face aux problèmes liés aux conditions de travail des stagiaires, associées aux différences législatives significatives entre États membres et types de stages, nécessitent

d'envisager une action de l'UE. De plus, ces dernières années ont été marquées par la montée des inquiétudes d'une multitude d'acteurs (organisations de jeunesse, partenaires sociaux) autour de l'utilisation problématique des stages (en particulier ceux utilisés afin de remplacer un emploi régulier). Ces préoccupations ont été relayées par le Parlement européen qui a appelé à de nouvelles règles pour éviter l'exploitation des stagiaires dans toute l'UE. En outre, de nouvelles données recueillies pour cette étude suggèrent que le paysage réglementaire n'est pas seulement complexe en raison des différences entre les États membres et les types de stages, mais souffre également d'un manque de clarté qui conduit à une incertitude juridique et à des pratiques entraînant des résultats sous-optimaux (comme l'utilisation problématique et la mauvaise qualité des stages). Ces facteurs soulignent la nécessité d'une action de l'UE pour aborder ces problèmes et les défis futurs.

## Approche méthodologique

L'étude a suivi les lignes directrices et la boîte à outils pour une meilleure réglementation de la Commission Européenne dans son approche des questions de recherche et dans le développement de sa méthodologie. Suite à l'identification des problèmes et de la nécessité d'une action de l'UE, les activités de recherche se sont concentrées sur i) Quels objectifs politiques devraient être atteints ? ii) Quelles sont les différentes options pour atteindre les objectifs ? iii) Quels sont les impacts des différentes options, et qui sera affecté ?

Un ensemble varié de méthodes a été utilisé pour la collecte et l'analyse des données. La collecte de données a été réalisée en suivant une approche qualitative, aboutissant à une base de données riche en information, tandis que des méthodes statistiques et économétriques avancées ont été utilisées pour estimer la prévalence du problème et les impacts des différentes options politiques. Globalement, l'approche comprend:

- Un examen large de la littérature pertinente et des sources de données existantes, y compris la littérature académique et grise, les enquêtes antérieures, les statistiques nationales et toutes autres informations pertinentes.
- Un examen approfondi des politiques nationales et des mesures mises en œuvre dans le domaine des stages dans les 27 États membres de l'UE, y compris une analyse législative détaillée au niveau national.
- Une enquête en ligne ciblant les autorités publiques nationales, les partenaires sociaux, les entreprises, les organisations de jeunesse, les organisations civiles et les établissements d'enseignement.
- Un ensemble d'entretiens semi-directifs ciblant les partenaires sociaux et d'autres acteurs pertinents au niveau de l'UE.
- Une analyse empirique avancée utilisant l'Enquête sur les forces de travail de l'UE pour estimer la prévalence et les caractéristiques clés des stagiaires et des stages.

## Objectifs politiques

L'étude a identifié que l'objectif général d'une éventuelle initiative de l'UE dans ce domaine pourrait être d'améliorer l'utilisation, la qualité, l'inclusivité et l'accès aux stages. Les objectifs spécifiques seraient de 1) Déterminer, prévenir et combattre l'utilisation problématique des stages ; 2) Améliorer les conditions de travail et l'élément de formation des stages ; et 3) Améliorer l'inclusivité et l'accès aux stages de haute qualité.

## Options de politiques publiques

Les options évaluées dans ce rapport visent à aborder les trois problèmes et les trois objectifs spécifiques identifiés. Les options peuvent être obligatoires pour les stagiaires considérés comme des travailleurs en vertu du droit de l'UE (un groupe correspondant plus ou moins aux stagiaires rémunérés) et non-obligatoires pour les autres stagiaires (c'est-à-dire les stagiaires non-rémunérés) sauf dans des cas spécifiques.

### Les options visant à adresser l'utilisation problématique des stages comprennent :

- **Des mesures afin d'identifier les stages problématiques**, comprenant la définition de critères objectifs par les États membres pour déterminer les stages problématiques (P.1.1.1), ou une liste d'éléments définis par la Commission européenne à prendre en compte par les autorités compétentes pour déterminer si un stage peut être considéré comme problématique (P.1.1.2).
- **Des mesures afin de prévenir l'utilisation des stages problématiques**, comprenant la fixation d'une durée totale maximale des stages avec le même employeur de six mois, sauf dans certains cas dûment justifiés (P.1.2.1), l'assurance que les employeurs n'exigent pas d'expérience professionnelle préalable comme condition pour candidater à un stage (P.1.2.2), et une obligation pour les employeurs de fournir, dans leurs offres de stages publiées, des informations sur les tâches à accomplir, le contenu formatif, les conditions de travail, la rémunération et la couverture sociale (P.1.2.3).
- **Des mesures afin de renforcer les contrôles de l'inspection du travail**, pour que les États membres assurent des inspections ciblées et efficaces et prennent des mesures de contrôles pour lutter contre les stages problématiques (P.1.3.1), et pour garantir la mise à disposition de ressources humaines, techniques et financières aux autorités compétentes pour effectuer des contrôles et inspections efficaces (P.1.3.2).
- **Des mesures de soutien pour les stagiaires**, comprenant la création ou l'utilisation de canaux existants pour signaler les pratiques répréhensibles et les mauvaises conditions de stage pendant et après la période de stage (P.1.4.1), et garantir la possibilité pour les représentants des travailleurs (et éventuellement d'autres acteurs légitimes et pertinents) de participer à des procédures afin de faire respecter les droits des stagiaires (P.1.4.2).

### Les options visant à adresser la mauvaise qualité des stages comprennent :

- **Des mesures sur les conditions de travail, y compris la rémunération et l'accès à la protection sociale pour les stagiaires**, à savoir garantir une rémunération/compensation juste/proportionnée pour les stagiaires (P.2.1.1), et des recommandations non-contraignantes pour octroyer l'accès à la sécurité sociale aux stagiaires (P.2.1.2).
- **Des mesures visant à améliorer la transparence sur les conditions de travail des stagiaires et la composante de formation**, comprenant une obligation pour les employeurs de fournir à tous les stagiaires des informations individuelles écrites sur les objectifs de formation et le contenu du stage, y compris des informations sur la supervision, le mentorat et l'évaluation des compétences acquises (P.2.2.1), ou une obligation pour les employeurs de fournir un accord de stage écrit, comprenant par exemple, les tâches attendues, le contenu de la formation (y compris des informations sur la supervision, le mentorat et l'évaluation), les conditions de travail, la rémunération et la protection sociale (P.2.2.2).

### Les options visant à adresser l'accès inégal aux stages de qualités comprennent :



- **Des orientations non contraignantes pour améliorer l'accès aux stages pour les groupes vulnérables**, comprenant l'accessibilité des personnes handicapées au travers notamment d'un milieu de travail adapté (P.3.1.1) et la garantie d'inclusivité des stages pour tous les groupes vulnérables via des activités de sensibilisation (P.3.1.2).
- **Des orientations non contraignantes pour améliorer les stages transfrontaliers**, comprenant la clarification du cadre juridique national gouvernant les stages, l'établissement de règles claires sur l'accueil des stagiaires d'autres États membres et la réduction des formalités administratives (P.3.2.1), l'utilisation plus étendue du réseau EURES et l'échange d'informations sur les stages rémunérés via le portail EURES (P.3.2.2), le développement avec le Bureau de Coordination Européen EURES (au sein de l'Autorité européenne du travail) d'outils pratiques et informatifs pour les stagiaires (potentiels) sur les stages transfrontaliers (P.3.2.3), et en cas de mobilité en dehors de l'UE, la promotion du respect du QFT, le cas échéant, dans les accords entre les établissements d'enseignement et les employeurs (P.3.2.4).
- **Des orientations non contraignantes pour faciliter et améliorer les stages à distance et hybrides**, comprenant l'accès à des outils de travail numériques (P.3.3).

Toutes ces mesures politiques peuvent être introduites en combinaison avec des mesures d'accompagnement telles que le suivi des données sur les stages, l'implication des partenaires sociaux et des acteurs pertinents, la sensibilisation et le soutien aux employeurs (en particulier les PME) pour fournir des stages de qualité.

## Impacts des options

### Le scénario de référence

Les projections de tendance suggèrent qu'en 2030, le nombre total de stagiaires dans l'UE pourrait augmenter de 16% par rapport au niveau de 2021, principalement en raison de l'augmentation des stages rémunérés (hausse de 36% sur la période) et d'une légère augmentation (5%) des stages non rémunérés. Par type de stage, la plus forte croissance est attendue pour les MPT et les stages ALMP, suivies par les ECT et les OMT. Les facteurs de l'utilisation problématique des stages devraient persister en l'absence d'intervention politique. Malgré les améliorations récentes, la diversité et la complexité des cadres juridiques nationaux concernant les stages entre et au sein des États membres, devraient également subsister. Le nombre de stagiaires, dont la durée du stage peut être considérée comme excessivement longue, y compris des stages consécutifs avec le même employeur, devrait également rester élevé pour tous les types de stages. À l'exception des stages ALMP, les mécanismes de suivi et de contrôle des stages devraient continuer à faire défaut dans plusieurs pays et leur efficacité serait probablement encore entravée par les ressources limitées des organes en charge de l'inspection du travail.

Etant donné que le QFT reste le principal cadre normatif pour les stages dans l'UE, les ECT et les MPT resteraient en dehors de son cadre d'application. Certaines initiatives récentes<sup>5</sup> amélioreraient les conditions pour les stagiaires considérés comme des travailleurs en vertu du droit de l'UE, cependant, les autres stagiaires (non-rémunérés) non considérés comme des travailleurs, continueraient de souffrir de mauvaises conditions de travail. La persistance des stages problématiques et l'accès limité à la

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<sup>5</sup> Directive 2019/1152 relative à des conditions de travail transparentes et prévisibles dans l'Union européenne ; Recommandation du Conseil 2019/C 387/01 relative à l'accès des travailleurs salariés et non salariés à la protection sociale ; Directive 2022/2041 relative à des salaires minimaux adéquats dans l'Union européenne.

rémunération et à la protection sociale pour certains stagiaires sont susceptibles de maintenir les inégalités existantes en matière d'accès aux opportunités de stage. En outre et malgré une tendance à la hausse du nombre de stages transfrontaliers, les barrières liées au manque de ressources financières, à l'intérêt des stagiaires, à l'information ainsi qu'aux différences entre les cadres législatifs nationaux pour les stages, représentent des obstacles à l'augmentation de la mobilité transfrontalière des stagiaires.

### **Options abordant l'utilisation problématique des stages**

Les mesures visant à lutter contre les stages problématiques pourraient bénéficier à plus de 370 000 stagiaires rémunérés ayant effectué un stage de plus de six mois, dont 100 000 stagiaires ayant effectué un stage de longue durée avec un contenu de formation limité. La mesure visant à garantir qu'aucune expérience antérieure n'est requise pour un stage pourrait impacter 1,1 million de stagiaires (rémunérés et non rémunérés) ayant effectué plusieurs stages.

En termes d'**impacts sociaux**, le déclin des pratiques abusives améliorerait le bien-être et les conditions de travail des stagiaires. Les employeurs bénéficieraient également d'une amélioration de l'environnement de travail provenant d'une plus grande satisfaction des employés et des stagiaires, et bénéficieraient de gains de réputation pour attirer de nouveaux stagiaires. Limiter la durée des stages à six mois et ne pas exiger d'expérience antérieure contribueraient à améliorer l'employabilité des (jeunes) individus.

En ce qui concerne les **impacts économiques**, pour les stagiaires, le déclin des stages problématiques pourrait améliorer la productivité et faciliter la transition vers le marché du travail. Pour les employeurs, l'utilisation appropriée des programmes de stages pourrait accroître la compétitivité des entreprises et entraînerait une concurrence plus équitable sur le marché. Les stages problématiques transformés en relations de travail régulières augmenteraient les coûts salariaux pour les employeurs offrant des stages problématiques, en raison des augmentations potentielles de la rémunération et des dépenses de sécurité sociale. Outre les coûts de familiarisation avec les nouvelles mesures, la transparence requise dans les offres de stage concernant les conditions de travail et le contenu formatif, entraînerait des coûts annuels totaux estimés entre 15 millions et 46 millions d'euros selon le niveau de mise en œuvre dans les États membres. La limite de six mois pourrait entraîner des coûts de recrutement pour les employeurs allant jusqu'à 68 millions d'euros dans l'UE. Pour les autorités publiques, les mesures faciliteraient la détection des cas d'utilisation abusifs des stages. Les autorités publiques encourraient des coûts de transposition et d'application allant de 27 000 à 1,2 million d'euros selon la capacité actuelle des organes d'inspection du travail. Au fil du temps, les coûts d'application pourraient diminuer avec la prévalence des stages problématiques.

Concernant les **droits fondamentaux**, les initiatives soutiennent le droit aux conditions de travail équitables.

### **Options abordant la mauvaise qualité des stages**

En termes d'**impacts sociaux**, une rémunération équitable et l'accès à la sécurité sociale, tout en inscrivant ces informations dans une convention écrite, amélioreraient les conditions de travail des stagiaires et pourraient rendre les stages plus accessibles, soutenant ainsi la mobilité sociale. Plus de 1 million de stagiaires potentiellement sans protection sociale pourraient être affectés par la mesure sur l'accès à la sécurité sociale. L'augmentation du nombre de stagiaires couverts par le régime de sécurité sociale devrait contribuer à réduire la précarité des jeunes et leur risque de pauvreté. Pour les employeurs, ces mesures pourraient améliorer l'environnement de travail, rendre les stages plus attrayants et augmenter la rétention des talents.

En ce qui concerne les **impacts économiques**, pour les stagiaires, ces interventions garantiraient des avantages directs liés à la réception d'une juste rémunération et d'une

protection sociale. Pour les employeurs, ces mesures pourraient améliorer la motivation et la productivité des stagiaires, limiter leurs démissions et réduire les coûts de recrutement. Dans le même temps, les employeurs qui offrent actuellement des stages avec des niveaux de rémunération faibles devraient supporter des coûts salariaux allant de 731 millions à 2,3 milliards d'euros dans l'UE<sup>6</sup>. La fourniture d'un accès à la protection sociale pourrait entraîner des coûts supplémentaires pour les employeurs allant de 2,8 milliards à 8,4 milliards d'euros au niveau de l'UE selon le niveau de mise en œuvre par les États membres. Ces coûts pourraient décourager les PME à recruter des stagiaires, entraînant une diminution de la demande globale de stagiaires. De plus, les coûts supplémentaires agrégés liés à l'introduction d'une déclaration écrite pourraient varier de 27 millions à 80 millions d'euros au niveau de l'UE selon le degré de mise en œuvre par les États membres. Pour les autorités publiques, une augmentation du nombre de stagiaires rémunérés et ayant accès à la protection sociale pourrait produire un impact positif sur les recettes fiscales et le niveau des cotisations de sécurité sociale. Malgré les coûts de transposition et d'application, ces mesures politiques devraient réduire les dépenses de protection sociale en soutenant l'intégration des jeunes, en particulier ceux en situation de vulnérabilité, sur le marché du travail.

Concernant les **droits fondamentaux**, les mesures politiques contribueraient à garantir le droit à des conditions de travail équitables, l'accès à une protection sociale adéquate et aux soins de santé.

### Options abordant l'accès inégal aux stages de qualité

En termes d'**impacts sociaux**, les mesures sur l'accessibilité contribueraient à garantir que les personnes handicapées et celles issues de milieux vulnérables puissent acquérir une expérience professionnelle, améliorant leur employabilité. Les mesures visant à faciliter les stages transfrontaliers et à distance/hybrides devraient augmenter le nombre d'opportunités de stage, et le nombre de stagiaires pouvant bénéficier de compétences supplémentaires au travers d'une expérience internationale. Les employeurs devraient avoir accès à un plus grand nombre de talents et à une main-d'œuvre plus diversifiée, ce qui pourrait contribuer à créer une image positive de l'organisation, tant auprès du personnel que des clients.

En ce qui concerne les **impacts économiques**, pour les stagiaires, les mesures visant à améliorer l'accessibilité des stages contribueraient à accroître les opportunités de stage et les perspectives sur le marché du travail pour les jeunes en situation de vulnérabilité, augmentant ainsi les possibilités de mobilité sociale. Les employeurs devraient également bénéficier d'augmentations de productivité. Outre les coûts de familiarisation avec la législation, ils supporteraient des coûts d'ajustement limités pour mener des activités de sensibilisation envers les groupes vulnérables, adapter le lieu de travail pour les stagiaires handicapés, fournir des outils de travail numériques pour les stages à distance, et poster des offres d'emploi pour recruter des stagiaires internationaux. Pour les autorités publiques, outre les coûts d'application, les mesures augmentant l'employabilité des groupes vulnérables pourraient entraîner une diminution des dépenses de protection sociale.

Concernant les **droits fondamentaux**, ces mesures contribueraient à garantir le droit à l'égalité des chances et au traitement des groupes sous-représentés, à la non-discrimination, à la liberté de circulation et au droit à la vie familiale.

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<sup>6</sup> Selon les hypothèses retenues concernant le nombre de stagiaires affecté, le niveau de rémunération considéré comme juste et le degré de mise en œuvre de l'initiative par les États Membres.

## Kurzfassung

Zurzeit ist die 2014 angenommene Empfehlung des Rates über einen Qualitätsrahmen für Praktika (im Folgenden "QRP 2014"), die eine Reihe von Qualitätskriterien für Praktika (insbesondere für Praktika auf dem offenen Markt und in der aktiven Arbeitsmarktpolitik) vorschlägt, die wichtigste Referenz in der EU für Praktika.

Die 2023 durchgeführte Evaluation des QRP von 2014 und die 2023 durchgeführte Eurobarometer-Umfrage deuten darauf hin, dass sich die Qualität der Praktika in der EU seit 2014, also seit der Annahme der Empfehlung, verbessert hat. Es bestehen jedoch nach wie vor Bedenken hinsichtlich der Arbeitsbedingungen von Praktikanten, die in den nationalen Rechtsvorschriften nicht angemessen berücksichtigt wurden, sowie hinsichtlich der erheblichen Unterschiede zwischen den Mitgliedstaaten und zwischen den verschiedenen Arten von Praktika. Während Praktika zunehmend als entscheidender Schritt zur Verbesserung der Beschäftigungsfähigkeit, insbesondere von jungen Menschen, anerkannt werden, haben eine wachsende Zahl von Berichten über unfaire Praktiken und Gerichtsverfahren über missbräuchliche Praktiken die mediale Aufmerksamkeit und politische Besorgnis über die bestehenden nationalen Rahmenbedingungen für Praktika und darüber, was die EU diesbezüglich tun kann, erhöht.

Ziel dieser Studie ist die Unterstützung der Folgenabschätzung einer neuen Initiative auf EU-Ebene, die darauf abzielt, die Qualität, die Inklusivität und den Zugang zu Praktika zu verbessern.

## Verbreitung von Praktika in der EU

Praktika werden als "bezahlte oder unbezahlte Arbeitserfahrung von begrenzter Dauer, die eine Lern- und Ausbildungskomponente aufweist mit dem Ziel, praktische und berufliche Erfahrungen zu sammeln und so die Beschäftigungsfähigkeit zu verbessern und den Übergang in reguläre Beschäftigung zu erleichtern"<sup>7</sup> definiert. Es werden vier Haupttypen von Praktika unterschieden:

- **Praktika auf dem offenen Arbeitsmarkt (POA):** Sie finden im Rahmen einer Vereinbarung zwischen Arbeitgeber:in und Praktikant:in statt. Sie zielen darauf ab, Praktikanten eine erste Arbeitserfahrung durch Lernen und Ausbildung am Arbeitsplatz zu ermöglichen.
- **Praktika im Rahmen aktiver arbeitspolitischer Maßnahmen (PAAM):** Sie beinhalten eine Vereinbarung zwischen drei Akteuren – Arbeitgeber:in, Praktikant:in und der öffentliche Arbeitsverwaltung - ohne zwingend einen Arbeitsvertrag und eine Vergütung zu beinhalten. Diese Praktika richten sich an arbeitslose oder inaktive junge Menschen und zielen darauf ab, ihnen den Übergang ins Berufsleben zu erleichtern.
- **Bildungspraktika (BP):** Sie sind Bestandteil von Lehrplänen der formalen Bildung oder der beruflichen Aus- und Weiterbildung.
- **Praktika, die obligatorischer Bestandteil einer Berufsausbildung sind (POBB):** Praktika, deren Inhalt gemäß nationaler Rechtsvorschriften geregelt ist und deren Absolvierung eine zwingende Voraussetzung für die Ausübung eines bestimmten Berufs (z. B. Arzt, Architekt) ist.

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<sup>7</sup> Rat (2014). Empfehlung des Rates vom 10. März 2014 über einen Qualitätsrahmen für Praktika, (2014/C 88/01).

Auf der Grundlage von Daten aus der EU-AKE zeigt die Studie auf, dass sich der Bestand an bezahlten Praktikant:innen in der EU im Jahr 2019 auf etwa 1,6 Millionen belief, davon 24 % in POA, 36 % in PAAM, 31 % in BP und 9 % in POBB. Die geschätzte Zahl der unbezahlten Praktikant:innen lag im selben Jahr bei knapp 1,5 Millionen. Dies bedeutet, dass der geschätzte Gesamtbestand an Praktikant:innen etwa 3 Millionen betrug, von denen 52 % bezahlt und der Rest unbezahlt war.

Bei den **bezahlten Praktikant:innen** handelt es sich überwiegend um junge Menschen, etwa 80 % sind unter 30 Jahre alt. Sie sind etwas häufiger männlich (2019 waren es 51 % gegenüber 49 % Frauen) und verfügen über ein hohes Bildungsniveau: Über 85 % haben mindestens die Sekundarstufe II abgeschlossen. Darüber hinaus leben sie eher in städtischen Gebieten (mehr als 40 %) und absolvieren ihre Praktika in der Regel in Dienstleistungsberufen oder hochqualifizierten Berufen und nicht in handwerklichen Berufen. Bezahlte Praktika sind häufiger in der Dienstleistungsbranche und in größeren Unternehmen zu finden, wobei mehr als 40 % der Praktikanten in (relativ wenigen) mittleren und großen Unternehmen beschäftigt sind. Diese Merkmale sind bei POBB, BP und POA noch ausgeprägter. Im Gegensatz dazu finden sich in den Praktika im Rahmen der aktiven Arbeitsmarktpolitik mehr Praktikant:innen aus benachteiligten Verhältnissen und mehr Praktika in industriellen Branchen oder kleinen Unternehmen. Im Jahr 2019 entfielen auf Deutschland, Spanien, Frankreich, Italien und Polen, die fünf größten Länder, mehr als 80 % des Gesamtbestands an bezahlten Praktika.

Auf der Grundlage von Informationen, die aus dem Flash-Eurobarometer von 2023 extrapoliert wurden, sind **unbezahlte Praktikant:innen** in der EU im Durchschnitt jünger als bezahlte Praktikant:innen, und eine leichte Mehrheit von ihnen sind Frauen. Ähnlich wie bei bezahlten Praktika sind unbezahlte Praktikant:innen im Allgemeinen hoch gebildet, wobei die Mehrheit entweder eine postsekundäre nicht-tertiäre Bildung oder eine tertiäre Bildung abgeschlossen hat. In der EU kommt der größte Anteil der unbezahlten Praktikant:innen aus kleinen oder mittelgroßen Städten oder aus Großstädten.

Im Allgemeinen spiegeln die Unterschiede zwischen den vier Arten von Praktika eher die "strukturellen" Merkmale dieser Praktika wider. So erfordern beispielsweise POBB und BP immer ein höheres Bildungsniveau. POBB finden in der Regel nach einem Hochschulabschluss statt und BP größtenteils als Teil der tertiären Bildung (allerdings nicht nur). Da Arbeitslose die Hauptzielgruppe der aktiven Arbeitsmarktpolitik sind, sind Praktikant:innen im Rahmen der aktiven Arbeitsmarktpolitik in der Regel weniger gebildet und gehören benachteiligten Gruppen an.

## Was ist das Problem mit Praktika?

Im Zusammenhang mit Praktika wurden drei Hauptprobleme festgestellt: i) die problematische Nutzung von Praktika, ii) qualitativ schlechte Praktika und iii) ungleicher Zugang zu Praktika.

Da in den einzelnen Ländern unterschiedliche Regelungen für die verschiedenen Arten von Praktika gelten, ist die EU-Praktikumslandschaft aufgrund der zersplitterten und oft unklaren rechtlichen Rahmenbedingungen in den Mitgliedstaaten schwer zu verstehen und anfällig für Missbrauch.

Das erste festgestellte Problem betrifft die problematische Nutzung von Praktika. Es gibt zwar keine allgemein akzeptierte operationelle Definition dessen, was ein problematisches Praktikum ausmacht, aber für die Zwecke dieser Studie umfasst es Fälle, in denen reguläre Angestelltenstellen als Praktika getarnt werden, sowie Fälle, in denen Praktikant:innen als Arbeitnehmer betrachtet werden, aber Arbeitgeber die durch das Arbeitsrecht oder Tarifverträge vorgeschriebenen rechtlichen Standards nicht einhalten. Es kann schwierig sein, solche Fälle ohne Einschaltung eines Gerichts zu erkennen und

zu dokumentieren. Der QRP 2014 bietet jedoch eine Orientierungshilfe, indem er die Merkmale "echter" Praktika beschreibt, darunter eine angemessene Dauer, eine strukturierte Lernkomponente und die Rolle von Praktika bei der Erleichterung des Übergangs in den Arbeitsmarkt. Ausgehend von diesen Grundsätzen und den Erkenntnissen aus Literatur und Rechtsprechung lassen sich mehrere gleichzeitig auftretende Elemente als Indikatoren für problematische Praktika heranziehen. Diese sind: i) übermäßig lange Dauer oder aufeinanderfolgende Praktika beim selben Anbieter; ii) Fehlen von strukturierten Lern-/Ausbildungsinhalten; iii) Praktikant:innen, die Tätigkeiten mit der gleichen Intensität wie reguläre Angestellte ausüben und/oder ähnliche Verantwortlichkeiten haben; iv) Praktikant:innen, die bereits über Erfahrungen aus früheren Praktika oder regulären Arbeitsverhältnissen verfügen; und v) hoher Anteil von Praktika im Vergleich zu regulären Angestellten innerhalb einer Organisation.

Es gibt Hinweise darauf, dass diese Elemente in den einzelnen Mitgliedstaaten und bei den verschiedenen Arten von Praktika in unterschiedlichem Maße vorhanden sind und dass die problematische Nutzung von Praktika eine Realität ist. In der EU sind im Durchschnitt mehr als 10 % aller Praktika länger als sechs Monate, und Mehrfachpraktika bei ein und demselben Anbieter sind weit verbreitet (im Durchschnitt 40 % der befragten Praktikant:innen). Verschiedene Interessengruppen berichten von Fällen, bei denen Praktikant:innen Aufgaben und ein Arbeitspensum zugewiesen werden, welche mit denen von Angestellten vergleichbar sind, und bei denen eine gewisse Vorerfahrung Voraussetzung für die Auswahl ist.

Das zweite Problem, d. h. qualitativ schlechte Praktika, bezieht sich auf die Qualität von zwei entscheidenden Aspekten des Praktikums: die Arbeitsbedingungen und die Lernkomponente. Es ist eine Tatsache, dass etwa die Hälfte aller Praktika nicht vergütet wird, und laut Umfragen gibt mehr als ein Viertel der Praktikant:innen an, keinen Zugang zu irgendeiner Art von Sozialschutz gehabt zu haben. Außerdem geben im Durchschnitt mehr als 20 % der Praktikant:innen an, dass das, was sie während ihres Praktikums gelernt haben, beruflich nicht von Nutzen war.

Drittens kann der Zugang zu Praktika, insbesondere zu hochwertigen Praktika, einschließlich grenzüberschreitender Praktika, für Personen aus schutzbedürftigen Gruppen eingeschränkt sein, insbesondere bei unbezahlten Praktika. Fern- und Hybrid-Praktika, zu denen der Zugang für bestimmte Gruppen, insbesondere für benachteiligte Gruppen, einfacher sein könnte, stehen vor der Herausforderung, eine ausreichende Qualität der Praktika zu gewährleisten, insbesondere in Bezug auf die Lerninhalte.

Die Herausforderungen, die sich aus der Komplexität der nationalen Regelungsansätze in Bezug auf den Rechtsstatus von Praktikant:innen, der unzureichenden Durchsetzung und den fehlenden Kapazitäten für Kontrollen und Inspektionen sowie der schwachen Position der Praktikant:innen im Vergleich zu den Anbietern ergeben, gehören zu den wichtigsten Triebkräften der Probleme. Verschiedene externe Faktoren, wie die Veränderungen auf dem Arbeitsmarkt durch den ökologischen und digitalen Wandel, die schrumpfende Bevölkerung im erwerbsfähigen Alter, die Zunahme von Fernarbeit und hybriden Arbeitsverhältnissen sowie neue Phänomene wie das "Job-Hopping" haben ebenfalls zu dem Problem beigetragen.

## Warum sollte die EU handeln?

Die anhaltende Besorgnis über die begrenzte Einhaltung der QRP-Grundsätze von 2014 und die Unzulänglichkeit der nationalen Rechtsvorschriften in mehreren Mitgliedstaaten in Bezug auf die Arbeitsbedingungen von Praktikant:innen in Verbindung mit den erheblichen Unterschieden zwischen den Mitgliedstaaten und den verschiedenen Arten von Praktika machen es erforderlich, Maßnahmen auf EU-Ebene zu erwägen. Darüber hinaus wurden in den letzten Jahren von verschiedenen Interessenvertretern, darunter

Jugendorganisationen und Gewerkschaften, zunehmend Bedenken hinsichtlich der problematischen Nutzung von Praktika (insbesondere der so genannten "Scheinpraktika", d. h. Praktika, die einen regulären Arbeitsvertrag ersetzen) geäußert. Diese Bedenken wurden von den Mitgliedern des Europäischen Parlaments aufgegriffen, die neue Regeln forderten, um die Ausbeutung von Praktikant:innen in der EU zu verhindern. Darüber hinaus deuten die in dieser Studie gesammelten neuen Erkenntnisse darauf hin, dass das regulatorische Umfeld nicht nur aufgrund der Unterschiede zwischen den Mitgliedstaaten und den verschiedenen Arten von Praktika äußerst komplex ist, sondern dass der Mangel an Klarheit in vielerlei Hinsicht zu Rechtsunsicherheit und Ad-hoc-Praktiken führt, was wiederum suboptimale Ergebnisse zur Folge hat (z. B. problematische Nutzung und schlechte Qualität von Praktika). Diese Faktoren unterstreichen die Notwendigkeit von EU-Maßnahmen, um diese Probleme und künftige Herausforderungen anzugehen.

## Methodische Vorgehensweise

Die Studie orientierte sich bei der Operationalisierung der Forschungsfragen und der Entwicklung des methodischen Ansatzes an den Leitlinien und der Toolbox für Bessere Rechtsetzung. Nach der Beantwortung der Frage, warum die EU handeln sollte, konzentrierten sich die Forschungsaktivitäten auf die Fragen i) Welche Ziele sollte die Politik erreichen? ii) Welche verschiedenen Optionen gibt es, um die Ziele zu erreichen? iii) Welche Auswirkungen haben die verschiedenen politischen Optionen und wer ist davon betroffen?

Für die Datenerhebung und -analyse wurde eine Reihe verschiedener methodischer Ansätze verwendet. Die Datenerhebung erfolgte anhand eines qualitativen Ansatzes, was zu einem umfangreichen Datenbestand führte, während statistische und ökonometrische Methoden zur Schätzung der Prävalenz des Problems und der Auswirkungen der verschiedenen politischen Optionen eingesetzt wurden. Insgesamt umfasste der Ansatz Folgendes:

- Eine umfassende und erschöpfende Durchsicht der einschlägigen Literatur und der vorhandenen Datenquellen, einschließlich akademischer und grauer Literatur, früherer Erhebungen, nationaler Statistiken und anderer relevanter Informationen.
- Eine umfassende Überprüfung der nationalen politischen Maßnahmen, die in den EU-27-Mitgliedstaaten im Bereich der Praktika durchgeführt werden, einschließlich einer detaillierten rechtlichen Analyse auf Länderebene
- Eine Online-Umfrage, die sich an nationale Behörden, nationale Unternehmens-/Arbeitgeberverbände, Unternehmen (Praktikumsanbieter), nationale Gewerkschaften, nationale Jugendorganisationen, Organisationen der Zivilgesellschaft und Bildungseinrichtungen richtet
- Eine Reihe von halbstrukturierten Interviews mit Sozialpartnern und anderen Interessenvertreter:innen auf EU-Ebene
- Fortgeschrittene empirische Analyse unter Verwendung der EU-Arbeitskräfteerhebung zur Schätzung der Verbreitung und der wichtigsten Merkmale von Praktika.

## Politische Ziele

Die Studie ergab, dass das allgemeine Ziel einer möglichen neuen EU-Initiative in diesem Bereich darin bestehen könnte, die Nutzung, die Qualität, die Inklusivität und den Zugang zu Praktika zu verbessern. Die spezifischen Ziele würden darin bestehen, 1) die problematische Nutzung von Praktika zu identifizieren, zu verhindern und zu bekämpfen;

2) die Arbeitsbedingungen und die Ausbildungskomponente von Praktika zu verbessern; und 3) die Inklusivität von und den Zugang zu hochwertigen Praktika zu verbessern.

## Politische Optionen

Die in diesem Bericht bewerteten politischen Optionen zielen darauf ab, die drei genannten Probleme und drei spezifischen Ziele anzugehen. Die politischen Optionen können für Praktikant:innen, die nach EU-Recht als Arbeitnehmer gelten (d. h. bezahlte Praktikant:innen), verbindlich und für andere Praktikant:innen (d. h. unbezahlte Praktikant:innen) unverbindlich gelten, außer in bestimmten Fällen.

**Zu den politischen Optionen, die sich mit der problematischen Nutzung von Praktika (Politikbereich 1) befassen, gehören:**

- **Maßnahmen zur Identifikation problematischer Praktika**, einschließlich der Identifikation problematischer Praktika durch die Mitgliedstaaten (P.1.1.1), oder eine von der Europäischen Kommission festgelegte Liste von Elementen, die von den zuständigen Behörden bei der Identifikation problematischer Praktika zu berücksichtigen sind (P.1.1.2).
- **Maßnahmen zur Verhinderung problematischer Praktika**, einschließlich der Festsetzung der maximalen Gesamtdauer von Praktika bei demselben Arbeitgeber auf sechs Monate, außer in hinreichend begründeten Fällen (P.1.2.1), der Sicherstellung, dass Arbeitgeber:innen von Praktikumsbewerber:innen keine vorherige Berufserfahrung in dem Tätigkeitsbereich verlangen (P.1.2.2) und der Verpflichtung für Arbeitgeber:innen, in Stellenausschreibungen Informationen über die erwarteten Aufgaben, Lerninhalte, Arbeitsbedingungen, Vergütung und Sozialschutz zu nennen (P.1.2.3).
- **Maßnahmen zur Verstärkung von Inspektionen und Durchsetzung**, einschließlich der Verpflichtung für die Mitgliedstaaten, wirksame gezielte Kontrollen und Inspektionen zu gewährleisten und Durchsetzungsmaßnahmen zu ergreifen, um gegen problematische Praktika vorzugehen (P.1.3.1) und die Bereitstellung personeller, technischer und finanzieller Ressourcen für die zuständigen Behörden zu gewährleisten, um wirksame Kontrollen und Inspektionen durchzuführen (P.1.3.2).
- **Unterstützende Maßnahmen für Praktikant:innen**, einschließlich der Schaffung oder Nutzung bestehender Kanäle zur Meldung von Missständen und schlechten Praktikumsbedingungen während und nach dem Praktikum (P.1.4.1) und Gewährleistung der Möglichkeit für Arbeitnehmervertretungen (und möglicherweise andere Akteure mit einem legitimen Interesse), sich an Verfahren zur Durchsetzung der Rechte von Praktikant:innen zu beteiligen (P.1.4.2).

**Zu den politischen Optionen zur Bekämpfung der schlechten Qualität von Praktika (Politikbereich 2) gehören:**

- **Maßnahmen zu Arbeitsbedingungen, einschließlich der Vergütung und des Zugangs zu Sozialschutz für Praktikant:innen**, d. h. Gewährleistung einer fairen/angemessenen Vergütung/Entschädigung für Praktikant:innen (P.2.1.1) und unverbindliche Leitlinien, um sicherzustellen, dass Praktikant:innen Zugang zum Sozialschutz haben (P.2.1.2).
- **Maßnahmen zur Verbesserung der Transparenz in Bezug auf die Arbeitsbedingungen von Praktikant:innen und die Lernkomponente**, einschließlich der Verpflichtung für Arbeitgeber:innen, allen Praktikant:innen individuelle schriftliche Informationen über die Lernziele und den Inhalt des Praktikums zu geben, einschließlich Informationen über Aufsicht, Betreuung und



Bewertung (P.2.2.1), oder die Verpflichtung für Arbeitgeber:innen, eine schriftliche Praktikumsvereinbarung vorzulegen, die beispielsweise die erwarteten Aufgaben, den Lerninhalt (einschließlich Informationen über Aufsicht, Betreuung und Bewertung), die Arbeitsbedingungen, die Vergütung und den Zugang zum Sozialschutz enthält (P.2.2.2).

**Zu den politischen Optionen, die den ungleichen Zugang zu hochwertigen Praktika (Politikbereich 3) betreffen, gehören:**

- **Unverbindliche Leitlinien zur Verbesserung des Zugangs zu Praktika für schutzbedürftige Gruppen**, einschließlich der Sicherstellung der Zugänglichkeit für Menschen mit Behinderungen durch barrierefreie Arbeitsplätze (P.3.1.1) und der Sicherstellung der Einbeziehung aller schutzbedürftigen Gruppen in die Praktika durch Outreach-Maßnahmen (P.3.1.2).
- **Unverbindliche Leitlinien zur Verbesserung grenzüberschreitender Praktika**, einschließlich der Klärung des nationalen Rechtsrahmens für Praktika und der Festlegung klarer Regeln für die Aufnahme von Praktikant:innen aus anderen Mitgliedstaaten und die Entsendung von Praktikant:innen in andere Mitgliedstaaten sowie zur Verringerung von Verwaltungsformalitäten (P.3.2.1), Nutzung des EURES-Netzwerks und Austausch von Informationen über bezahlte Praktika über das EURES-Portal (P.3.2.2), mit dem europäischen EURES-Koordinierungsbüro (innerhalb der Europäischen Arbeitsbehörde) praktisches Orientierungsmaterial und Informationen für (potenzielle) Praktikant:innen über grenzüberschreitende Praktika zu entwickeln (P.3.2.3) und im Falle der Mobilität außerhalb der Europäischen Union die Einhaltung des QRP, wo anwendbar, in Vereinbarungen zwischen Bildungseinrichtungen und Praktikumsanbietern zu fördern (P.3.2.4).
- **Unverbindliche Leitlinien zur Erleichterung und Verbesserung von Fernpraktika und gemischten Praktika**, einschließlich des Zugangs zu digitalen Arbeitsmitteln (P.3.3).

Alle politischen Maßnahmen können in Kombination mit begleitenden Maßnahmen wie der Überwachung von Daten zu Praktika, der Einbeziehung von Sozialpartnern und Stakeholdern, der Sensibilisierung und der Unterstützung von Arbeitgebern (insbesondere KMU) bei der Bereitstellung hochwertiger Praktika eingeführt werden.

## Auswirkungen der politischen Optionen

### Das Basisszenario

Lineare Trendprojektionen deuten darauf hin, dass die Gesamtzahl der Praktikant:innen in Europa bis 2030 gegenüber 2021 um 16 % ansteigen könnte, was hauptsächlich auf den Anstieg der bezahlten Praktika (um 36 %) und einen geringen Anstieg (um 5 %) der unbezahlten Praktika zurückzuführen ist. Der relativ größte Zuwachs wird bei POBB und PAAM erwartet, gefolgt von BP und POA. Es wird erwartet, dass die Ursachen für die problematische Nutzung von Praktika bestehen bleiben, wenn die Politik nicht eingreift. Trotz der jüngsten Verbesserungen werden die Vielfalt und Komplexität der nationalen rechtlichen Rahmenbedingungen für Praktika zwischen und innerhalb der Mitgliedstaaten wahrscheinlich bestehen bleiben. Die Zahl der Praktikant:innen, die ein übermäßig langes Praktikum absolvieren, einschließlich derjenigen, die ein aufeinanderfolgendes Praktikum bei demselben Arbeitgeber absolvieren, wird wahrscheinlich bei allen Arten von Praktika hoch bleiben. Abgesehen von der aktiven Arbeitsmarktpolitik fehlen in mehreren Ländern

möglicherweise weiterhin Überwachungs- und Kontrollmechanismen für Praktika, und ihre Wirksamkeit wird wahrscheinlich weiterhin durch die begrenzten Ressourcen der Aufsichtsbehörden behindert.

Da die QRP-Empfehlung nach wie vor der wichtigste Rahmen für Praktikumsstandards in der EU ist, werden die BP und POBB weiterhin nicht berücksichtigt. Einige neuere Initiativen<sup>8</sup> würden die Bedingungen für Praktikant:innen, die nach EU-Recht Arbeitnehmerstatus haben, verbessern, doch die anderen (unbezahlten) Praktikant:innen, die nicht als Arbeitnehmer gelten, würden weiterhin unter schlechten Arbeitsbedingungen leiden. Das Fortbestehen betrügerischer Praktiken und der eingeschränkte Zugang zu Entlohnung und Sozialschutz für einige Praktikant:innen wird wahrscheinlich die bestehenden Ungleichheiten beim Zugang zu Praktikumsmöglichkeiten aufrechterhalten. Trotz der zunehmenden Verbreitung von grenzüberschreitenden Praktika stellen Hindernisse im Zusammenhang mit fehlenden finanziellen Mitteln, dem Interesse der Praktikant:innen, Zugang zu Informationen sowie Unterschieden in den nationalen rechtlichen Rahmenbedingungen für Praktika ein Hindernis für die Erhöhung der grenzüberschreitenden Mobilität von Praktikant:innen dar.

### **Politikbereich 1 - Politische Optionen zur Bekämpfung des problematischen Einsatzes von Praktika**

Die Maßnahmen zur Bekämpfung problematischer Praktika könnten mehr als 370 000 bezahlten Praktikant:innen zugute kommen, die ein Praktikum von mehr als sechs Monaten Dauer absolviert haben, von denen 100 000 ein Langzeitpraktikum mit unzureichenden Lerninhalten absolvierten. Die Maßnahme, die sicherstellen soll, dass für ein Praktikum keine Vorerfahrungen erforderlich sind, könnte sich auf 1,1 Millionen (bezahlte und unbezahlte) Praktikant:innen auswirken, die mehrere Praktika absolviert haben.

Was die **sozialen Auswirkungen** betrifft, so würde der Rückgang missbräuchlicher Praktiken das Wohlbefinden und die Arbeitsbedingungen von Praktikant:innen verbessern. Die Anbieter von Praktika würden auch von einem besseren Arbeitsumfeld profitieren, in dem Mitarbeitende und Praktikant:innen zufriedener sind, sowie von einem Imagegewinn, um neue Praktikant:innen zu gewinnen. Die Begrenzung der Dauer von Praktika auf sechs Monate und die Tatsache, dass keine Vorerfahrungen erforderlich sind, würden die Beschäftigungsfähigkeit junger Menschen verbessern.

Was die **wirtschaftlichen Auswirkungen** anbelangt, so könnte der Rückgang problematischer Praktika die Produktivität der Praktikant:innen verbessern und den Übergang in den Arbeitsmarkt erleichtern. Für Arbeitgeber:innen könnte die angemessene Nutzung von Praktikumsregelungen die Wettbewerbsfähigkeit der Unternehmen erhöhen und zu einem faireren Wettbewerb auf dem Markt führen. Praktikumsverhältnisse, die in Arbeitsverhältnisse umgewandelt werden, würden die Arbeitskosten für Praktikumsanbieter, die problematische Praktika anbieten, aufgrund potenziell höherer Vergütungen und Sozialversicherungsausgaben erhöhen. Neben den Kosten für die Gewöhnung an die neuen Maßnahmen würde die geforderte Transparenz der Arbeitsbedingungen und Lerninhalte in den Stellenangeboten jährliche Gesamtkosten von schätzungsweise 15 bis 46 Mio. EUR verursachen, je nachdem, wie weit die Umsetzung in den Mitgliedstaaten fortgeschritten ist. Die Begrenzung der Dauer auf sechs Monate könnte den Arbeitgeber:innen EU-weit Einstellungskosten in Höhe von bis zu 68 Mio. EUR verursachen. Für die Behörden würde es durch die Maßnahmen einfacher, Fälle von Missbrauch von Praktika aufzudecken. Den Behörden würden Umsetzungs- und Durchsetzungskosten entstehen, die je nach der derzeitigen Kapazität der

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<sup>8</sup> Richtlinie (2019/1152) über transparente und vorhersehbare Arbeitsbedingungen; Empfehlung (2019/C 387/01) über den Zugang zum Sozialschutz für Arbeitnehmer und Selbstständige, Richtlinie (2022/2041) über angemessene Mindestlöhne in der Europäischen Union.

Aufsichtsbehörden zwischen 27 000 und 1,2 Millionen Euro liegen. Im Laufe der Zeit könnten die Durchsetzungskosten mit dem Rückgang der betrügerischen Praktika sinken.

Was die **Grundrechte** betrifft, so unterstützen die Initiativen das Recht auf faire Arbeitsbedingungen.

### **Politikbereich 2 - Politische Optionen zur Bekämpfung der schlechten Qualität von Praktika**

Was die **sozialen Auswirkungen** betrifft, so würde die Gewährung einer angemessenen Vergütung und des Zugangs zum Sozialschutz sowie die Bereitstellung dieser Informationen in einer schriftlichen Erklärung die Arbeitsbedingungen der Praktikant:innen verbessern und den Zugang zu Praktika erleichtern, was die soziale Mobilität erhöhen würde. Mehr als 1 Million Praktikant:innen, die derzeit keinen Zugang zum Sozialschutz haben, könnten von der Maßnahme über den Zugang zum Sozialschutz betroffen sein. Es ist davon auszugehen, dass die Erhöhung der Zahl der von den Sozialversicherungssystemen unterstützten Praktikant:innen die prekäre Situation junger Menschen und ihr Armutsrisiko verringern wird. Für Praktikumsanbieter könnten diese Maßnahmen das Arbeitsumfeld verbessern, Praktika attraktiver machen und die Bindung von Talenten erhöhen.

Was die **wirtschaftlichen Auswirkungen** anbelangt, so würden diese Maßnahmen den Praktikant:innen direkte wirtschaftliche Vorteile in Verbindung mit einer angemessenen Vergütung und Sozialschutz garantieren. Für die Praktikumsanbieter könnten diese Maßnahmen die Motivation und Produktivität der Praktikant:innen verbessern, ihre Bindung an das Unternehmen erhöhen und die Einstellungskosten senken. Gleichzeitig ist davon auszugehen, dass den Praktikumsanbietern, die derzeit Praktika mit unangemessener Vergütung anbieten, EU-weit Arbeitskosten in Höhe von 731 Mio. EUR bis 2,3 Mrd. EUR entstehen<sup>9</sup>. Der Zugang zum Sozialschutz könnte den Praktikumsanbietern auf EU-Ebene zusätzliche Kosten in Höhe von 2,8 Mrd. EUR bis 8,4 Mrd. EUR verursachen, je nachdem, wie weit die Mitgliedstaaten bei der Umsetzung gehen. Diese Kosten könnten KMU davon abhalten, Praktikant:innen einzustellen, was zu einem Rückgang des Gesamtangebots an Praktikumsplätzen führen könnte. Darüber hinaus könnten die zusätzlichen Kosten, die mit der Einführung einer schriftlichen Vereinbarung auf EU-Ebene verbunden sind, je nach dem Grad der Umsetzung durch die Mitgliedstaaten zwischen 27 und 80 Mio. EUR liegen. Für die öffentliche Hand könnte sich ein Anstieg der Zahl der vergüteten Praktikant:innen, die Zugang zum Sozialschutz haben, positiv auf die Steuereinnahmen und die Höhe der Sozialversicherungsbeiträge auswirken. Trotz der Umsetzungs- und Durchsetzungskosten dürften diese politischen Maßnahmen die öffentlichen Ausgaben für die sozialen Sicherungsnetze (wie die Sozialhilfe) verringern, indem sie die Eingliederung junger Menschen, insbesondere derjenigen in prekären Situationen, in den Arbeitsmarkt unterstützen.

In Bezug auf die **Grundrechte** würden die politischen Maßnahmen dazu beitragen, das Recht auf faire Arbeitsbedingungen, Zugang zu angemessenem Sozialschutz und Gesundheitsversorgung zu gewährleisten.

### **Politikbereich 3 - Politische Optionen zur Bekämpfung des ungleichen Zugangs zu hochwertigen Praktika**

Was die **sozialen Auswirkungen** betrifft, so tragen die Maßnahmen zur Barrierefreiheit dazu bei, dass Menschen mit Behinderungen und aus sozial schwachen Verhältnissen Arbeitserfahrung sammeln können, was ihre Beschäftigungsfähigkeit erhöht. Maßnahmen zur Erleichterung von grenzüberschreitenden und Fern-/Hybrid-Praktika können die Zahl der Praktikumsmöglichkeiten erhöhen, und Praktikant:innen können von der Entwicklung

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<sup>9</sup> Abhängig von den Annahmen über die Anzahl der betroffenen Auszubildenden, die Höhe der Vergütung, die einer gerechten Entlohnung entspricht, und den Grad der Umsetzung der Initiative durch die Mitgliedstaaten.

zusätzlicher Kompetenzen und internationaler Erfahrung profitieren. Anbieter von Praktika können auf einen größeren Pool von Talenten und eine vielfältigere Belegschaft zurückgreifen, was zu einem positiven Image der Organisation sowohl beim Personal als auch bei den Kunden beitragen könnte.

Was die **wirtschaftlichen Auswirkungen** auf die Praktikant:innen betrifft, so tragen Maßnahmen zur Verbesserung des Zugangs zu Praktika dazu bei, die Praktikumsmöglichkeiten und die Arbeitsmarktaussichten für junge Menschen in prekären Situationen zu verbessern und die Möglichkeiten der sozialen Mobilität zu erhöhen. Die Anbieter von Praktika könnten von Produktivitätssteigerungen profitieren. Neben den Kosten für die Gewöhnung an neue Rechtsvorschriften würden sie einige begrenzte Anpassungskosten tragen, um auf gefährdete Gruppen zuzugehen, den Arbeitsplatz für Praktikant:innen mit Behinderungen anzupassen, digitale Arbeitsmittel für Praktika im Ausland bereitzustellen und freie Stellen zur Anwerbung internationaler Praktikant:innen zu veröffentlichen. Für die Behörden könnten die Maßnahmen zur Verbesserung der Beschäftigungsfähigkeit gefährdeter Gruppen neben den Kosten für die Durchsetzung auch zu einem Rückgang der öffentlichen Ausgaben für die soziale Sicherung führen.

In Bezug auf die **Grundrechte** würden diese Maßnahmen dazu beitragen, das Recht auf Chancengleichheit und die Behandlung von unterrepräsentierten Gruppen, die Nichtdiskriminierung, die Freizügigkeit und das Recht auf Familienleben zu gewährleisten.

## 1 Introduction: Political and legal context

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’<sup>10</sup>. Four main types of traineeships are commonly distinguished:

- **Open market traineeships (OMT)**: take place under an agreement between the employer and the trainee. They aim to provide trainees with a first work experience through learning and training on-the-job<sup>11</sup>.
- **ALMP traineeships**: involve an agreement between three stakeholders – employer, trainee, and public employment services (“PES”) – without necessarily requiring a work contract and remuneration, although the trainee could receive some form of allowance or benefits, whereas the employer may receive some form of subsidy. These traineeships target unemployed/inactive young individuals and aim to smooth their transition to work<sup>12</sup>.
- **Education curricula traineeships (ECT)**: are part of curricula of formal education (school, vocational or higher education and training).
- **Mandatory professional traineeships (MPT)**: traineeships whose content is regulated under national law and whose completion is a mandatory requirement for trainees to access a specific profession (e.g. doctors, lawyers, professional accountants).

The Council Recommendation on a Quality Framework for Traineeships approved on 10 March 2014<sup>13</sup> (hereafter “2014 QFT” or simply “QFT”) constitutes the main reference in the EU on the matter and proposes a series of quality criteria for traineeships<sup>14</sup>. The QFT covers OMT and ALMP traineeships whereas ECT (school, vocational or higher education), and MPT are excluded from its scope (Council, 2014 point (28))<sup>15</sup>.

There is currently a strong demand from various stakeholders to reinforce the 2014 QFT. This section presents the main EU initiatives in the field along with the most relevant studies conducted by EU institutions or commissioned to third parties over the last decade (2012-2023).

The 2014 QFT has been subject to various studies and evaluations. In 2016, the European Commission (EC) published a Staff Working Document (SWD) which assessed the extent to which Member States (MS) legislations complied with the QFT<sup>16</sup>. Analysing OMT and ALMP traineeships separately, it concluded that the former are much less regulated than the latter<sup>17</sup>. The assessment further pointed out the challenges still needing to be addressed, and stressed the role of social partners in ensuring traineeship compliance with the 2014 QFT. In 2018, the EC, under the Youth Guarantee (YG), conducted another study on traineeships (including both OMT and ALMP traineeships),

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10 Council (2014). Council Recommendation of 10 March 2014 on a Quality Framework for Traineeships, (2014/C 88/01).

11 See EC (2018a). Traineeships under the Youth Guarantee. Experience from the ground. Luxembourg: Publications Office of the European Union.

12 Ibid.

13 Council (2014). Council Recommendation of 10 March 2014 on a Quality Framework for Traineeships (2014/C 88/01).

14 EC (2016). Applying the Quality Framework for Traineeships Accompanying the document The Youth Guarantee and the Youth Employment Initiative three years on, SWD(2016) 324 final.

15 Council (2014). Council Recommendation of 10 March 2014 on a Quality Framework for Traineeships, (2014/C 88/01).

16 EC (2018a). Traineeships under the Youth Guarantee. Experience from the ground. Luxembourg: Publications Office of the European Union.

17 Though evidence behind this analysis is not systematically presented in the IA report.

which identified further challenges and success factors<sup>18</sup>. Finally, the 2014 QFT has recently been subject to an evaluation<sup>19</sup>. Bearing in mind the QFT's non-binding nature, the EC (2023a) evaluation pointed out that the quality of traineeships has increased since 2014. Nevertheless, the evaluation also identified margin for improvements with regards to conformity, implementation on the ground, monitoring and enforcement<sup>20</sup>.

The 2014 QFT is part of a broader set of EU initiatives and policies that target young people. Amid this framework, the YG<sup>21</sup>, listed in the 2014 QFT recitals, constitute one of the main EU initiatives of the previous decades to address youth unemployment (Escudero and Lopez Mourelo, 2017)<sup>22</sup>. The 2013 YG required MS to ensure that any individual not in employment, education, or training (NEET) under the age of 25 receives a 'quality offer' of employment, possibly an apprenticeship or traineeship<sup>23</sup>, within four months of registration (raised to the age of 30 in 2020). On 30 October 2020, the Council adopted a recommendation on a 'A Bridge to Jobs', reinforcing and replacing the 2013 YG, with attention to "ensur[ing] that traineeship offers adhere to the minimum standards laid out in the Quality Framework for Traineeships", further cementing the 2014 QFT among the set of EU initiatives and policies targeting young people<sup>24</sup>.

The YG objectives have been included in the European Semester's employment guidelines addressed to MS. Starting from 2014 onwards, the guidelines underlined the need to further develop policy tools to keep on promoting youth employment and skill adaptability, in particular for NEET individuals. The European Pillar of Social Rights gives youth employment prominence in its commitment on active support to employment (principle 4) in combination with fair working conditions including wages (principle 6), and access to social protection for all, regardless of the type and duration of employment (principle 12).

The 30 November 2022 outcome document from the Conference on the Future of Europe, adopted with the backdrop of the 2022 European Year of Youth, is another EU initiative reflecting the willingness to support and incentivise quality traineeships. Over five million EU citizens were involved, and the emphasis on traineeship quality is evident. In particular, proposal no. 47, measure no. 5, recommends to "ensure that young people's internships and jobs adhere to quality standards, including remuneration, putting an end to youth minimum wages and any other discriminatory labour law provisions specific to young people"<sup>25</sup>.

Whereas the YG is primarily concerned with ALMP traineeships, the European Parliament (EP) in 2020, called for improved traineeship quality and a ban on unpaid traineeships of all types<sup>26</sup>. Moreover, the EP acknowledged the benefits of quality dimensions supported by the 2014 QFT (e.g. the written agreements, the need for learning objectives) and further called for a revision and an extension of these quality criteria.

Within the framework of the 2022 European Year of Youth, civil society organisations<sup>27</sup> and trade unions<sup>28</sup> argued for additional support to promote quality traineeships and ban

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18 EC (2018a). Traineeships under the Youth Guarantee. Experience from the ground. Luxembourg: Publications Office of the European Union.

19 EC (2023a). Evaluation of the Council Recommendation on a Quality Framework for Traineeships, SWD(2023) 9 final.

20 Results from the evaluation and their link to this study are presented in more details in Annex 4.

21 <https://eur-lex.europa.eu/uri=OJ:C:2013:120:0001:0006>.

22 Escudero, V., & López Mourelo, E. (2017). The European Youth Guarantee: A systematic review of its implementation across countries. ILO Working Papers, 21.

23 EC (2018a). Traineeships under the Youth Guarantee. Experience from the ground. Luxembourg: Publications Office of the European Union.

24 Council (2020). Council Recommendation of 30 October 2020 on A Bridge to Jobs – Reinforcing the Youth Guarantee, (2020/C 372/01), article 19.

25 <https://data.consilium.europa.eu/doc/document/ST-10033-2022-ADD-1-REV-1/en/pdf>.

26 <https://eur-lex.europa.eu/legal-content/uri=CELEX:52020IP0267>.

27 <https://www.youthforum.org/topics/no-more-unpaid-internships>; <https://jef.eu/news/ban-unpaid-internships/>.

unpaid ones<sup>29</sup>. These aspects have been reaffirmed in the EP Resolution of 16 February 2022, ‘Empowering European youth: Post-Pandemic Employment and Social Recovery’<sup>30</sup>, which provides an overview of traineeship-related issues and recent initiatives. The resolution reiterated the need for (i) a revision of the QFT; (ii) a ban on unpaid traineeships; and (iii) guaranteed access to social protection for trainees. Moreover, the EP resolution of 5 July 2022 on ‘mental health in the digital world of work’ places particular attention on the mental strain that the COVID-19 pandemic had on workers<sup>31</sup>. The resolution highlights that quality employment is paramount to support workers’ mental well-being and calls for improvements in trainees’ working conditions, especially in relation to fair remuneration and access to social benefits.

Finally, on 14 June 2023, the EP adopted an own-initiative resolution based on Art. 225 TFEU titled ‘Quality traineeships in the EU’<sup>32</sup>. The text calls for a revision of the current framework, i.e. the 2014 QFT (to ‘update and strengthen’). Among other points, it underlines the need to support trainees from vulnerable backgrounds and to grant trainees access to adequate compensation and social protection, proper mentoring, and better reporting of malpractice and poor conditions.

## 2 Problem definition

Before delving into the problem definition, Section 2.1 defines the scope of the study and conceptualises the categories of problematic traineeships, which are central to the remainder of the study. Section 2.2 presents descriptive evidence on the prevalence<sup>33</sup> of paid and unpaid traineeships in the EU. Section 2.3 discusses the three problems, and provides evidence supporting their relevance. Sections 2.4 and 2.5 present the consequences and the drivers of the problems, whilst Section 2.6 concludes with a discussion on the likely persistence of the identified problems.

### 2.1 Scope and definitions

#### 2.1.1 Scope

The study’s material scope covers the four types of traineeships defined previously (Section 1). It is important to clarify that apprenticeships do not fall under the scope of the study. In the literature, the definitions of apprenticeship and traineeship are not always distinct, and some features may overlap. For disambiguation, the study relies on the definition of apprenticeships in the European Framework for Quality and Effective Apprenticeships<sup>34</sup>. Some of the characterising elements of this definition apply to certain

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28 <https://www.etuc.org/etuc-resolution-european-year-youth-empowering-young-workers-through-actions>.

29 In this regard, see also the ruling of The European Committee of Social Rights on banning unpaid internships in BE: <https://www.youthforum.org/news/belgium-must-do-more-to-stop-unpaid-internships-rules-international-human-rights-body>.

30 <https://www.europarl.europa.eu/TA-9-2022-0045>.

31 Mental Health in the Digital World of Work, 2021/2098(INI), available [here](#).

32 [2020/2005\(INL\)](#), adopted text available [here](#).

33 The term prevalence is used in this report to refer to the number of trainees in general.

34 More precisely, the Council Recommendation on the European Framework for Quality and Effective Apprenticeships of 15 March 2018 ([https://eur-lex.europa.eu/legal-content/uri=CELEX:32018H0502\(01\)](https://eur-lex.europa.eu/legal-content/uri=CELEX:32018H0502(01))) defines apprenticeships as formal vocational education and training schemes that (i) combine learning in education or training institutions with substantial work-based learning in companies and other workplaces, (ii) lead to nationally recognised qualifications, (iii) are based on an agreement defining the rights and obligations of the apprentices, the employer and where appropriate, the vocational education and training institution, and (iv) the apprentice is being paid or otherwise compensated for the work-based component.

types of traineeships (e.g. MPT) but, in general, traineeships do not satisfy all of the relevant characteristics and are typically of much shorter duration than apprenticeships.

The key stakeholders of concern for the study are trainees and traineeship providers (TP), but also public administrations (PA), as the latter have a key role in ensuring proper implementation and enforcement as well as supporting trainees and TP through public funds. Intermediaries (notably platforms such as EURES, and PES for ALMP traineeships) are included in the peripheral scope of the study, as they often play a critical role in matching trainees with opportunities (e.g. under the YG). Other actors, like youth organisations, social partners etc. are considered to the extent they are relevant for specific options and impacts.

The geographical scope of the study includes all 27 MS as well as transnational and cross-border aspects linked to the quality of traineeships. The time scope is defined by the adoption of the 2014 QFT (i.e. 2014) until the most recent information available. When relevant, specific developments affecting the status quo are taken into account (peripheral scope). Given the importance of the forward-looking dimension for the study, medium-term developments until 2030 are also investigated.

### 2.1.2 Categories of problematic traineeships

To understand issues around traineeships, it is useful to identify categories of problematic traineeships. Three dimensions are relevant for such a purpose. First, traineeships are governed under different national frameworks, which in some cases lead to uncertainty or lack of clarity about the legal regime that applies to the trainee. It should be noted that the QFT remains neutral on whether trainees should be regarded as ‘workers’ under national and/or EU law (which is possible because the Recommendation focuses on vocational training aspects under Article 166 TFEU). This neutrality on the ‘worker’ status is meant to take account of the wide variety of situations in the MS with regard to the legal status of trainees and different definitions of employment relationship. On the one hand, the legal basis of Article 153 TFEU and the reference to ‘rights and working conditions of trainees under applicable EU and national law’ in principle no. 6 show that the QFT is intended to cover trainees who are workers under EU law, national law, collective bargaining agreements (CBA) or practice. On the other hand, the QFT, by recognising that in practice not all MS have in place a regulatory framework and that lack of transparency regarding working conditions can lead to unpaid traineeships, extends to all trainees, not only those who can be considered workers<sup>35</sup>.

Second, the absence of the three elements defining a traineeship according to the QFT can lead to problematic traineeships. These are:

1. the limited duration of the work experience (usually 6 months or less),
2. a learning and training component, and
3. the development of practical/professional experience to improve employability and facilitate the transition to employment.

Third, the working conditions in which the traineeship takes place can also contribute to determining the quality of the traineeship. Working conditions encompass a variety of aspects, like remuneration, access to social security, health and safety at work and hours worked. Poor working conditions can also lead to poor quality traineeships.

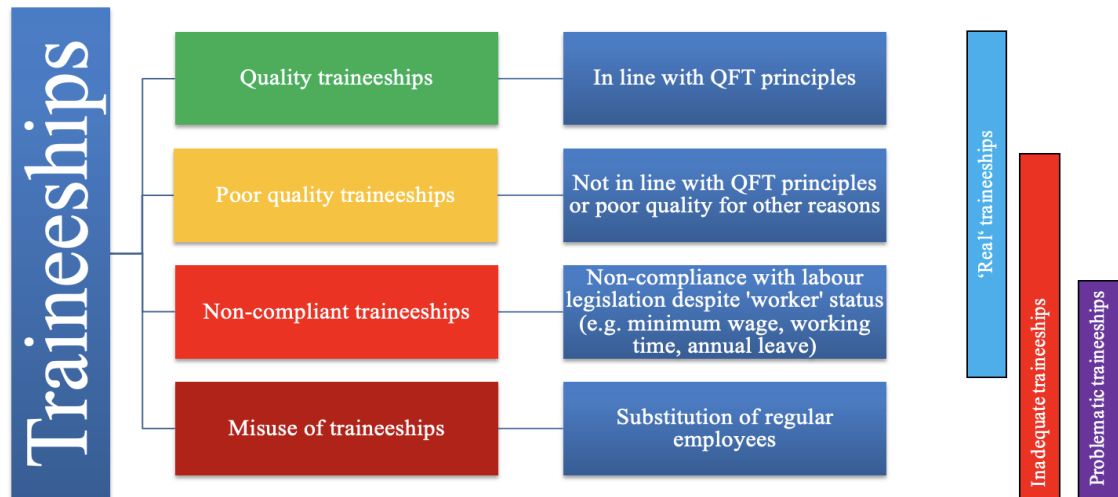
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<sup>35</sup> See Legal basis and subsidiarity chapter of the QFT impact assessment, SWD(2013) 495 final, available [here](#). As detailed in the impact assessment, Art 166 TFEU was added in order to cover unpaid trainees.



Based on these three dimensions, three categories of inadequate traineeships are identified, the last two being defined as “problematic traineeships” for the purpose of this study (See Figure 1)<sup>36</sup>.

Figure 1: Categories of traineeships



Note: Developed in cooperation between the European Commission and CEPS/Open Evidence.

**Traineeships of poor quality.** Such traineeships do not fulfil the (non-binding) quality requirements set by the QFT or are of poor quality for other reasons. Poor quality can materialise even if the traineeship is compliant with EU and national law and can result from a variety of reasons: poor learning/training content, unsatisfactory or menial tasks, excessive duration, lack of/limited social protection and no or very low pay. Where the poor quality of the traineeship is not in breach of national or EU legislation, there is no scope for enforcement authorities to intervene or for individual trainees or trade unions to take legal action.

**Traineeships non-compliant with national or EU law.** This is, in particular, the case when trainees are ‘workers’, but the employer does not meet the legal standards required by labour law or CBA, for instance in terms of remuneration, working time, annual leave, family-related leave and health and safety. In principle, there are legal remedies against breaches of labour law, but in practice, trainees are unlikely to go to court due to their weak contractual position and the short duration of traineeships. Yet, enforcement action by authorities could be envisaged. Furthermore, non-compliant traineeships may emerge in breach of legal norms other than labour law (e.g. specific national legislation for trainees who are not workers).

**Misuse of traineeships.** These traineeships do not meet the conditions for ‘real’ traineeships and occur when the purported traineeship substitutes a regular (entry-level) job and offers the TP a competitive advantage in terms of labour costs. In other words, misuse of traineeships refers to cases where regular employee positions are disguised as traineeships. The employer may (wrongly) treat the person as i) a trainee without an employment relationship, i.e. a non-worker, without the pay and other labour protection provisions that workers are entitled to under EU and national law or CBA; or ii) a trainee-employee (where such a status exists in national law) with an employment relationship, but benefiting from a lower pay and social protection than regular workers.

<sup>36</sup> There is no one-to-one matching between the three dimensions and the three categories of problematic traineeships. In practice, poor working conditions are often combined with situations of legal uncertainty or even problematic use of traineeships.

In the following sections of this study, the terms “problematic traineeships”, “problematic use of traineeships” or “use of problematic traineeships” are employed interchangeably to refer to non-compliant and misuse of traineeships.

## 2.2 Prevalence of traineeships in the EU27

Having defined the scope of the study and conceptualised problematic traineeships, this section presents and discusses the prevalence of traineeships in the EU and its MS. The lack of reliable and comparable data on traineeships constitutes an important limitation to understanding the potential issues associated with this type of working arrangement (EC, 2023a)<sup>37</sup>. This study attempts to fill this gap using micro-level data from the European Labour Force Survey (EU-LFS) for the period 2006-2021. The methodology, presented in section 2.2.1, is developed to obtain estimates for the numbers of paid and unpaid trainees by the four types of traineeships. The numbers are discussed in section 2.2.2. The legal status of trainees is the focus of section 2.2.3. Section 2.2.4 provides insights into the socio-demographic characteristics of trainees. Section 2.2.5 concludes with a discussion on the evolution of traineeships during the first year of the COVID-19 pandemic. Most of the relevant figures and tables for this section can be found in Annex 1 and Annex 3.

### 2.2.1 Measuring trainees in the EU-LFS

The EU-LFS, by providing detailed and harmonised information on the labour market status of individuals, including trainees, makes it possible to compute proxy measures for the prevalence of traineeships for the four distinct types of traineeships. However, since its definition of employment precludes unpaid work (except for family reasons), the EU-LFS only records **detailed labour market information for paid<sup>38</sup> trainees(hips)**, which is a limitation for the purpose of this study. Data on unpaid traineeships is scarce and available for specific MS or for certain sectors only. To estimate the number of unpaid traineeships and hence the total number of traineeships, we build on ad hoc information from the most recent EU-LFS data (2021 at the time of developing the methodology). However, the results should be interpreted carefully given that these numbers are obtained using (simplifying) assumptions. Furthermore, it is important to bear in mind that generally, **allowance and other funding (e.g. scholarships), that are often granted to trainees, do not constitute pay according to the EU-LFS definition. Therefore, unpaid traineeships obtained from the EU-LFS should not be interpreted as work arrangements without any source of income for trainees.** Additional estimates, based on alternative sources, are also discussed and used as comparison points.

#### 2.2.1.1 Paid traineeships

The identification of trainees relies on the variable ‘TEMPREAS’, which records the reason for which the respondent is on a temporary employment contract. The question on ‘TEMPREAS’ is asked only to employees, defined as *‘persons who work for a public or private employer based on a written or oral contract and who receive a payment in cash or in-kind (...) Employees normally work under direct supervision of, or according to guidelines set by the employing organisation or enterprise’*<sup>39</sup>. This definition is similar to the concept of worker under EU law (see discussion on legal status in Section 2.2.3), and implies that trainees recorded in the EU-LFS are paid. Importantly, this definition does not necessarily match the employee definition in national legislation. In practice, trainees often

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37 EC (2023a). Evaluation of the Council Recommendation on a Quality Framework for Traineeships’, SWD(2023) 9 final.

38 In the EU-LFS, pay refers to the income received from employment, which can be in nature or monetary form. Pay includes various compensation and allowances (fringe benefits) but exclude reimbursements for expenses.

39 <https://ec.europa.eu/eurostat/documents/54431/1966394/Standardised-key-social-variables.pdf> p.54.

have no clear status or they have a status which does not provide the same working conditions, in terms of pay or access to social protection, granted to regular employees. Hence, while trainees observed in the EU-LFS data are paid and broadly meet the conditions which define a worker (some form of pay and subordination relation), they are not necessarily employees in national legislation. Unpaid trainees are recorded as out of the labour force/unemployed.

One of the main advantages of the EU-LFS is that the rich information provided can be used to compute proxy measures for the four types of traineeships:

- MPT are proxied by trainees in occupations related to health (e.g. doctors/pharmacists, veterinarians), law (lawyers and judges) and education (e.g. DE and FR). These occupations are associated with highly educated individuals.
- ECT are proxied by trainees who report being in (formal) education in the last four weeks and who do not work in the MPT occupations defined above.
- ALMP trainees are proxied as trainees who are the target of the reinforced YG (i.e. low educated young individuals aged 15-29) and those who report being registered with a PES or that claim to have received help from a PES to find their current traineeship.
- OMT are calculated as a residual from the total number of trainees and MPT, ECT and ALMP trainees.

Some important limitations apply to EU-LFS data. First, for data before 2016, the variable 'TEMPREAS' aggregates trainees and apprentices. To isolate trainees from apprentices, a multiple imputation procedure<sup>40</sup> is used. Second, EU-LFS data for 2020 may be affected by disruptions in data collection caused by COVID-19. Third, the revisions to guidelines/definitions/variables that followed the entry into force of the new Integrated European Social Statistics Framework Regulation (IESS FR) in 2021 appear to be particularly problematic (at least for some MS) with high risk of breaks in the series, which limit comparability with pre-2021 data for important variables. For these reasons, estimates for 2020 and 2021 are not discussed in the analysis and are included only for completeness. 2019 constitutes the reference year for the statistics presented in this section. A final word of caution relates to the small sample size for some MS, with numbers for trainees often falling below the reliability threshold for publication defined by Eurostat<sup>41</sup>. As a result, MS data is not included in this version of the report (including in the Annexes). Against this background, it should be clear that the prevalence analysis presented below is based on estimates and not an actual identification of each traineeship type at the individual level.

### 2.2.1.2 Unpaid traineeships

While evidence on the prevalence of unpaid traineeships is scarce and mostly based on anecdotal evidence, the EU-LFS contains information that can be used to generate indicative estimates. The precise methodology is described in Annex 3.

- Based on the evidence from the legal analysis, MPT are assumed to be always paid<sup>42</sup>.

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40 More precisely, identification of trainees and apprentices before 2016 is based on Multiple Imputation by Chained Equations (MICE). See White, I. R., Royston, P., & Wood, A. M. (2011). Multiple imputation using chained equations: issues and guidance for practice. *Statistics in medicine*, 30(4), 377-399. Additional information is available in Annex 3.

41 These are BG, EE, LT (before 2015), LV (after 2011), RO and SK, and for data by type of traineeships: CY, HU, LU, MT and PT.

42 According to the legal analysis, while not all trainees in mandatory traineeships have employee status nor benefit from employee-equivalent remuneration, in most countries and for most professions, they are paid (see driver D2.1.1 in Section 2.5.3).

- ECT are proxied by exploiting the variable 'HATWORK' (introduced in 2021), which provides information on unpaid working experiences (including traineeships) as part of the education curriculum. This information is used to compute rates of unpaid traineeships per level of education<sup>43</sup>. These rates are then applied to stock of students currently in education to generate yearly numbers of unpaid ECT from 2016 to 2021.
- ALMP trainees are proxied as not-employed individuals<sup>44</sup> who are not in education, report being registered at a PES, and who participated in a training activity in the last four weeks. While one may expect ALMP traineeships to always be paid, the legal analyses suggest that, in most MS, unpaid traineeships, which do not preclude the provision of an allowance, are legal and possible (exceptions are BG, DE and CY). Thus, unpaid ALMP cannot be discarded a priori.
- OMT are obtained from the population not-in-employment, neither in education nor registered at a PES and who participated in a training activity in the last four weeks.

From this brief description, it should be clear that the most reliable estimate of unpaid trainees is for ECT, as it is based on an actual variable that enquires into unpaid work experience during studies. It is important to clarify that those ECT trainees are considered **unpaid to the extent that the hosting TP does not offer compensation related to the productive activity of the trainee**. In practice, it is often the case that the **student-trainee benefits from scholarships, grants and other forms of financial support**, most often provided by or mediated by the educational institution (e.g. Erasmus+ for cross-border traineeships).

## 2.2.2 Prevalence of traineeships in the EU

This section presents results for paid and unpaid traineeships in the EU27 taking 2019 as reference year.

### 2.2.2.1 Prevalence of paid traineeships

Figure 2 displays the evolution of the stocks of paid trainees aged 15-64 between 2006 and 2021 at EU27 level. The total number of paid trainees varies between 1.29 million (2013) and 1.61 million (2019). The evolution over the 2006-21 time period suggests a certain alignment between fluctuations in traineeships and the economic cycle - the number of paid trainees peaked in 2008 at the onset of the Great Recession, decreased continuously until 2013 (Euro Area crisis) and then increased steadily until 2019, in line with the recovery of EU labour markets. Furthermore, the general trend displayed in Figure 2 is consistent with evidence (often anecdotal) reporting an increase in traineeship uptake over the last decade(s) (Saniter and Siedler, 2014<sup>45</sup>; Cerulli-Harms, 2017<sup>46</sup>). In particular, the number of traineeships increased by 24.9% (+320 000) between 2013 and 2019, more than twice the percentage increase in the number of employees aged 15-64 over the same period (+ 9%).

With regards to the composition by type of paid traineeship (Figure 3), ALMP traineeships represent slightly more than one-third of the stock of paid trainees in the EU over the most recent years, though their share has decreased by 2.1 percentage points between 2013

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43 The EU-LFS provides information on education aggregated into three categories. See variable 'hatlev1d' in Table 40.

44 Not-employed stands for individuals either inactive or unemployed.

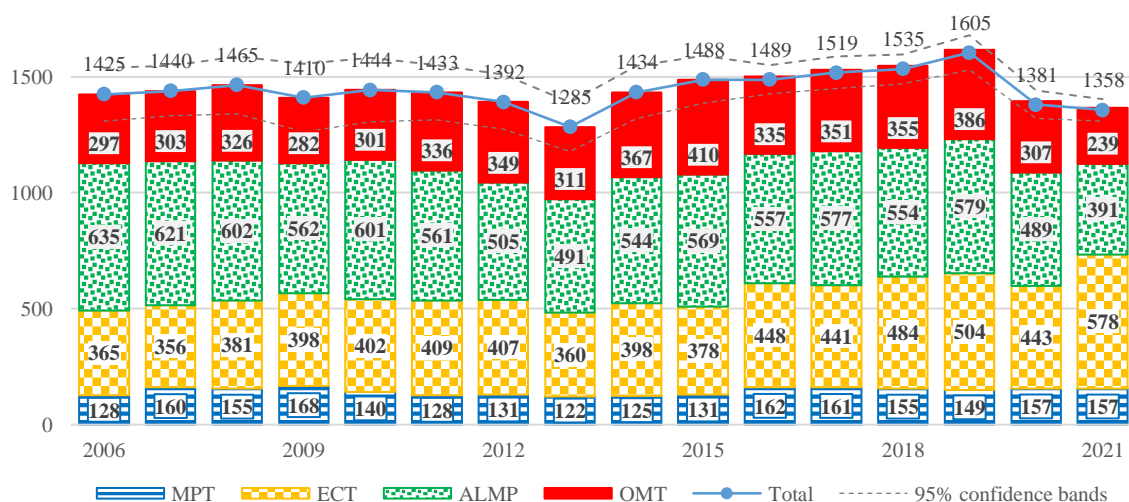
45 Saniter, N., & Siedler, T. (2014). Door opener or waste of time? The effects of student internships on labor market outcomes.

46 Cerulli-Harms, A. (2017). Generation internship: The impact of internships on early labour market performance.

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

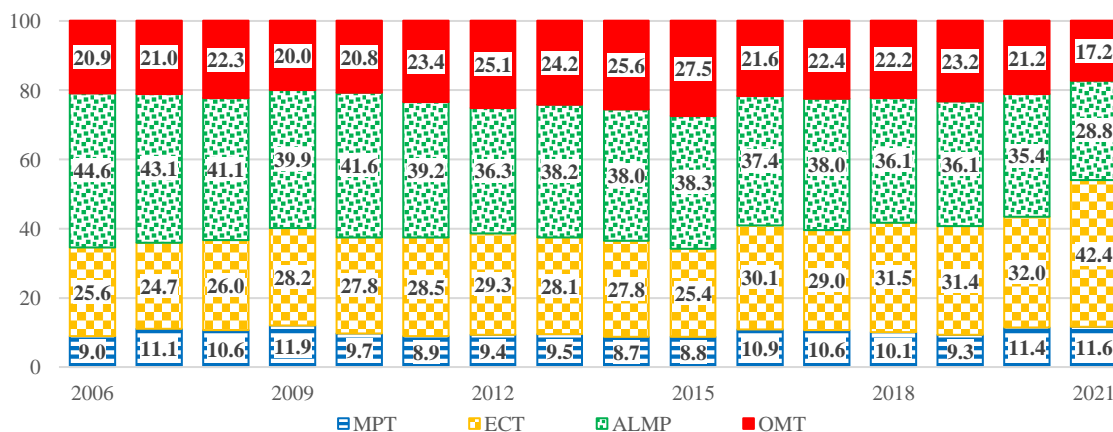
and 2019. ECT and OMT are the next most common types, representing respectively around 30<sup>47</sup>, and 20% of traineeships. MPT accounts for a residual share of approximately 10%.

**Figure 2: Stock of paid trainees in the EU27**



Note: Own elaboration based on EU-LFS. Stock of paid trainees in thousands, with 95% confidence obtained from the missing value imputation procedure. The EU27 level includes all MS except IE in 2006 (missing data) and MT before 2009.

**Figure 3: Composition of paid traineeships by type of traineeship, 2006-2021**



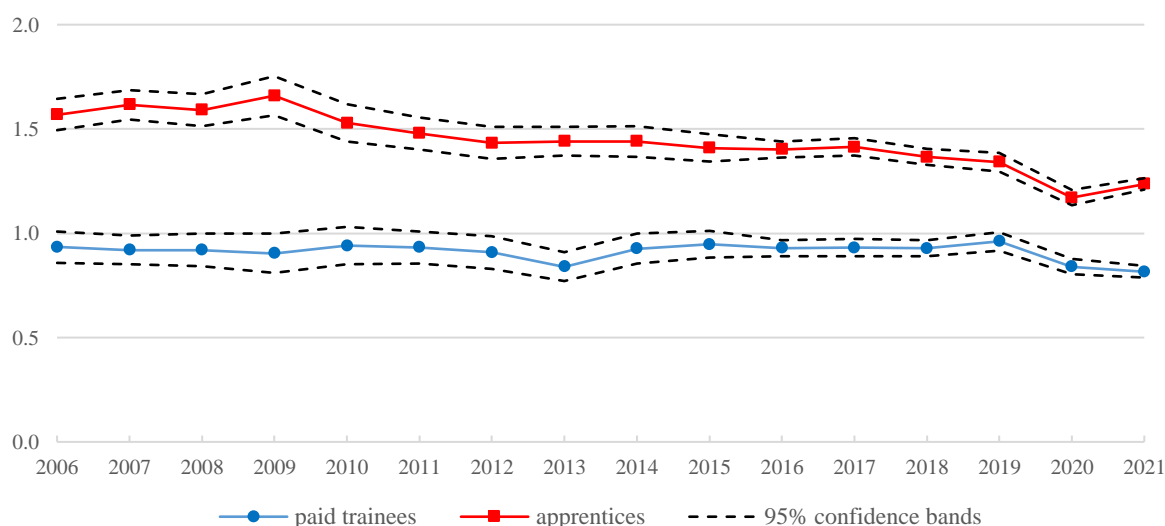
Note: Own elaboration based on EU-LFS data. See Figure 2 for additional information on the sample.

In addition to the absolute stock of trainees, Figure 4 shows the prevalence rate of paid trainees in the population of employees aged 15-64 (2006-2021), compared to the prevalence rate of apprentices. Looking at prevalence rates is useful as it allows for assessing the size of the (paid) trainee population relative to the overall population of employees. The prevalence rates for apprentices are displayed for comparison purposes

47 There is a substantial increase in the number of ECT in 2016, by around 70 000 trainees. Most of this increase can be linked to DE (+55 000) and a possible explanation is therefore the introduction of the minimum wage (MiLoG). The minimum wage covers traineeships lasting longer than 3 months. Though data on traineeship duration in the EU-LFS should be treated with care (and is not used in this study), the evidence for DE shows that the increase in ECT comes from traineeships lasting three to six months and six to twelve months, whereas the stock of ECT with duration lower than three months did not change.

only<sup>48</sup>. The prevalence of apprenticeships has been decreasing in the past decade, whilst the prevalence of paid traineeships increased, from a low of 0.84% in 2013 to 0.96% in 2019. However, the overall prevalence rate of apprenticeships in the labour market remains higher than that of paid traineeships at 1.34% in 2019. As stressed at the start of the section, unpaid trainees are not covered in this estimate, and the prevalence rate displayed constitutes a lower bound on the overall prevalence of traineeships in the EU.

**Figure 4: Prevalence rates – paid trainees and apprentices in the EU27, 2006-2021**



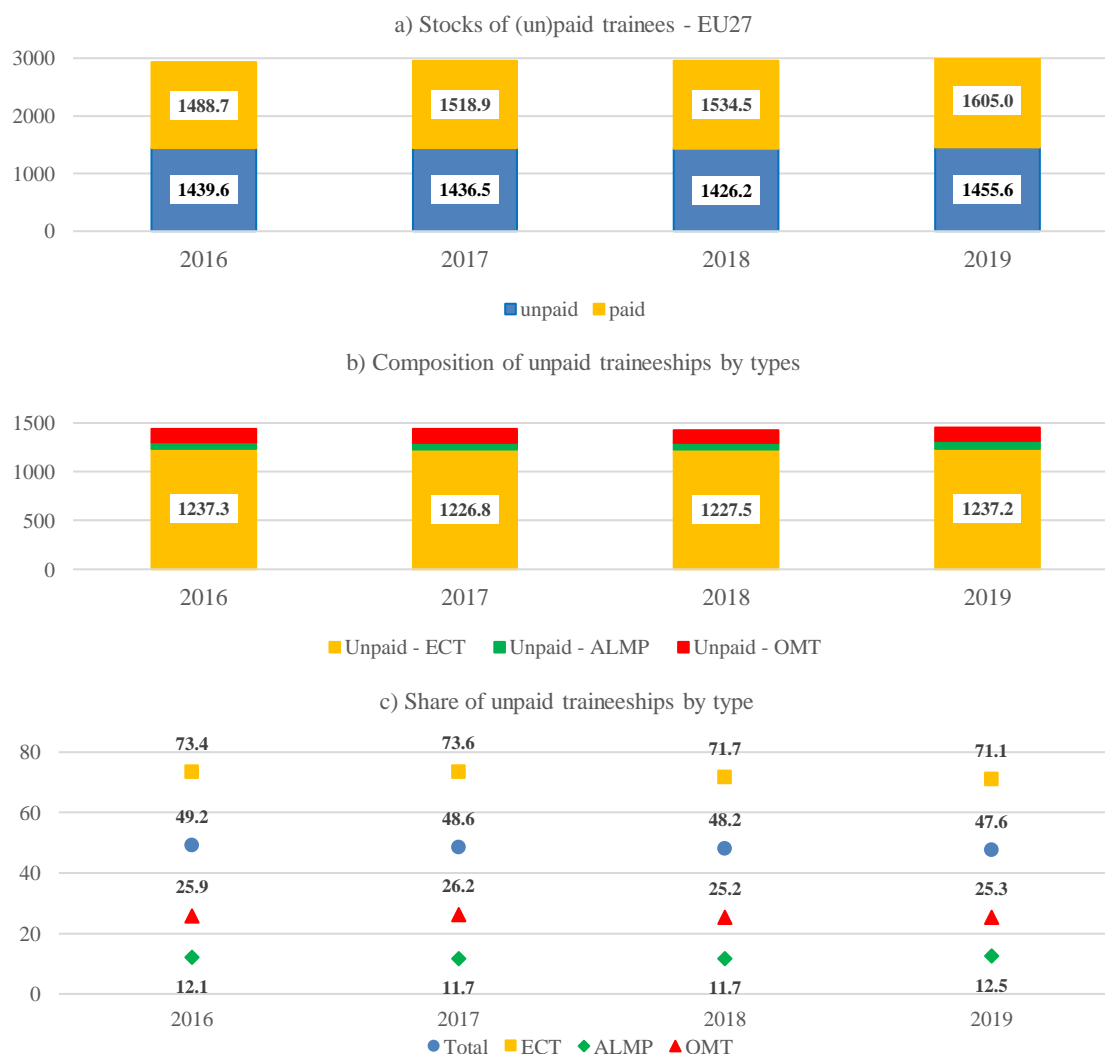
Note: Own elaboration based on EU-LFS. Prevalence rates are calculated as the stock of paid trainees or apprentices aged 15-64 over the total number of employees aged 15-64.

### 2.2.2.2 Prevalence of unpaid traineeships

Figure 5 below presents numbers for the stock of unpaid trainees at EU27 level obtained from the EU-LFS. In addition, Table 18 to Table 22 in Annex 1 summarise the numbers for paid, unpaid, and total trainees at EU27 level and by type of traineeships for the years 2016 and 2019. Due to methodological constraints (see Annex 3.1), stocks of unpaid trainees are not be computed for years prior to 2016 and the period 2016-2019 therefore constitutes our reference period when discussing evidence on unpaid traineeships. The upper panel in Figure 5 shows estimates of the stocks of paid and unpaid trainees in the EU. Between 2016 and 2019, the overall number of traineeships increased (+132 400 or +4.5%), due to an increase in the number of paid traineeships (+116 300 or +7.8%). The number of unpaid traineeships only slightly increased, by 16 000 units (+1.1%). The middle panel further shows that ECT account for the vast majority of unpaid traineeships in the EU, as they represent 1.24 million trainees in 2019 or ca. 85% of all unpaid traineeships (1.46 millions in total), while ALMP and OMT only account for marginal numbers. The lower panel in Figure 5 shows the share of unpaid traineeships by type. Unpaid ECT represent the large majority of ECT (71.1% in 2019), whereas unpaid OMT and ALMP traineeships only represent relatively small shares of the total number of OMT and ALMP traineeships (respectively 25.3% and 12.5% in 2019).

<sup>48</sup> The number of apprentices is obtained as a by-product of the missing value imputation procedure used to estimate the number of trainees. Apprentices do not constitute a population of interest but they can offer a comparison point for traineeships given that both schemes aim to facilitate labour market entry through work-based learning.

Figure 5: Paid and unpaid trainees in the EU - estimates using the EU-LFS



Note: Own estimates based on the EU-LFS. Numbers for ALMP traineeships and OMT should be considered with care.

Additional evidence on (unpaid) traineeships can be obtained from the Flash Eurobarometer 523 conducted in 2023 (hereafter Eurobarometer 2023) and the proxy measure used in Ecorys (2023)<sup>49</sup>. Figure 25 in Annex 1 shows that, across all traineeships, 44% of the respondents have not received any type of financial compensation, down from 59% in the 2013 Flash Eurobarometer. While results from the Eurobarometer are not comparable to the EU-LFS, since they focus on a cohort and inquire about traineeships that could have taken place a few years before the interview, it is nonetheless interesting to note the similar unpaid trainee share (44% in the Eurobarometer 2023, 47.6% in the EU-LFS) across the two sources. Furthermore, both results indicate that the share of unpaid trainees has been on a decreasing trend (from 2013 in the Eurobarometer and from 2016 in the EU-LFS).

Eurobarometer 2023 results offer additional insights on unpaid traineeships compared to the EU-LFS. Figure 25 in Annex 1 shows the considerable cross-country variation in the share of unpaid traineeships. In Croatia, 78% of respondents received compensation whereas in Belgium it is only half of this. Figures are generally in line with the trainee

49 Ecorys (2023). Study supporting the evaluation of the Quality Framework for Traineeships. Luxembourg: Publications Office of the European Union.

survey conducted as part of the Ecorys (2023) study supporting the QFT evaluation<sup>50</sup>. With a sample of 1836 respondents covering OMT and ALMP traineeships, the results showed that 47% of trainees received a financial allowance or compensation monthly, while a further 14% benefitted occasionally. 39% indicated that they have not received any allowance or compensation<sup>51</sup>.

Numbers based on the proxy used in Ecorys (2023) support study can be found in Figure 26 in Annex 1. This proxy intends to capture the estimated share of young people that could undertake an (paid) OMT by using the number of student in tertiary education and the participation rate for young adults aged 20-29. The proxy results in a much greater number of OMT in all MS. At EU level, it suggests that there were potentially 6.78 million OMT in 2019, a decrease compared to 2016 (6.96 millions). These numbers are more than 10 times those found using the EU-LFS for OMT (385 900 paid and 142 600 unpaid for a total of 528 500 in 2019).

### 2.2.3 Legal status and prevalence of traineeships

The question of the legal status of trainees is central to this study as important aspects of working conditions, like employment rights, pay, and access to social protection, are often attached to this status. The legal status is further of the utmost importance to precisely identify the scope and impacts of the potential initiative.

Identifying the legal status of each trainee in each MS, by type of traineeship, is an almost unachievable task due to the complexity of national laws and the very different legal status attached to trainees. Issues with heterogeneous definitions of what constitutes traineeships can also be problematic. Nonetheless, the legal analysis conducted for this study offers information to obtain an overview of the various legal statuses of trainees in MS<sup>52</sup>. Given the differences across countries, but also within countries across types of traineeships, and sometimes even within the same type of traineeship, a central question is whether trainees can be considered workers according to EU law and who they are.

The concept of 'worker' in EU law is developed in the case law of the Court of Justice of the European Union synthesised in the Lawrie-Blum<sup>53</sup> and Levin<sup>54</sup> "formulation"<sup>55</sup>. According to it, 'work' is "services performed under the supervision of another in return for remuneration, so long as such activities are genuine and effective and not on such a small scale as to be marginal and ancillary"<sup>56</sup>. In other words, three elements are required to define a worker: The individual must be engaged in an economic activity (hence excluding volunteers); There must be a relationship of subordination between the individual and the person or entity for whom they are working; The individual must receive remuneration for their work.

This concept is broad and can encompass different working arrangements, with a different degree of regulation (under national labour law or CBA) and protection offered to the worker. As illustrated in Section 2.5.2 in detail, some MS grant the status of employee to

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50 Ecorys (2023). Study supporting the evaluation of the Quality Framework for Traineeships. Luxembourg: Publications Office of the European Union.

51 Moreover, the survey showed that 54% of the allowance or compensation was below the national minimum wage, with the ratio being higher for males than females. Importantly, almost two-thirds (62%) considered that compensation was not sufficient to cover the basic costs of rent and food.

52 Table 31 to Table 35 in Annex 1 provide a mapping of legal provisions on the status of trainees and remuneration across MS by type of traineeship.

53 Judgment of the ECJ in Lawrie-Blum, 66/85, EU:C:1986:284.

54 Judgment in Levin, C-53/81, EU:C:1982:105.

55 O'Brien, C. R., Spaventa, E., & De Coninck, J. (2016). Comparative Report 2015: The concept of worker under Article 45 TFEU and certain non-standard forms of employment.

56 Ibid.



trainees by national law, which implies that trainees meet the three criteria to be considered workers according to EU law. But most often, MS do not mandate that trainees are entitled to all workers' provisions. Lower remuneration rates and even no remuneration, which could be justified by the special (learning) nature of the work relationship, is often possible (to the extent it is in line with Article 6(1), Directive 2022/2041)<sup>57</sup>. There are also cases with no regulation at all. Overall, one can identify three situations of trainees by legal status:

1. Trainees who have employee status in national law. They benefit from (national) labour code or legally binding CBA provisions. These trainees are also workers under EU law and benefit from the EU labour acquis. Based on the legal analysis and estimates this is more the exception than the rule. Table 31 in Annex 1 provides an overview of trainees who are granted employee status under national law.
  - Within the group of trainees who have employee status under national law (with statutory law regulating the legal status of trainees as workers) some do not benefit from the same level of labour law protections and/or CBA provisions applicable to regular workers (i.e. some exemptions apply, e.g. lower pay). In principle, if trainees are not remunerated, they should not be considered workers under EU law. However, the interpretation of remuneration given by the CJEU is sufficiently broad that it includes compensation such as a 'share' calculated on a collective basis<sup>58</sup>, in-kind benefits provided in lieu of a regular salary<sup>59</sup>, or even payments derived not exclusively from the employer but provided by subsidies from public funds<sup>60</sup>. This extensive approach is further exemplified in Fenoll, where the Court held that the person had to be included in the scope of application of EU law "regardless of 'the level of productivity of the individual concerned, nor the origin of the funds from which the remuneration is paid, nor even the limited amount of that remuneration'"<sup>61</sup>. As shown in the legal analysis, in countries where the trainee is an employee under national law, remuneration is usually mandatory (the only exception being AT), and, if those trainees receive no compensation at all, they would be excluded from the status of worker under EU law.
2. Trainees without employee status (under national law) but who qualify as workers under EU law, and hence to whom the EU acquis applies, because they:
  - are in a subordination relationship, and engaged in an economic activity,
  - are remunerated or receive compensation by virtue of law or legally binding CBA.

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57 Which provides that "1. Where Member States allow for different rates of statutory minimum wage for specific groups of workers or for deductions that reduce the remuneration paid to a level below that of the relevant statutory minimum wage, they shall ensure that those variations and deductions respect the principles of non-discrimination and proportionality, the latter including the pursuit of a legitimate aim."

58 Case C-3/87, Agegate, para 36.

59 Case 196/87, Steymann, para 12.

60 Case C-344/87, Bettray, para 15.

61 Case C-316/13, Fenoll, para 34. Further references in N. Kountouris, The Concept of 'Worker' in European Labour Law: Fragmentation, Autonomy and Scope, 47(2) Industrial Law Journal (2018), 192.

3. Trainees with no employee status (under national provisions) nor worker status under EU law. There is no statutory law or legally binding CBA regulating their legal status (or only soft law). These trainees are usually unpaid. As illustrated below, this situation is also rather common.

In the context of measuring and understanding the prevalence of traineeships, disentangling differences by legal status is central. While the EU-LFS is not based on strict legal criteria and the worker status of respondents is not checked, the three elements defining a worker under EU law are similar to those required to be recorded in the EU-LFS (namely, being in employment and being paid)<sup>62</sup>. This makes paid trainees recorded in the EU-LFS likely to be the most accurate approximation of trainees who are considered workers under EU law. Furthermore, the legal analysis provides information on the employee status of trainees by type of traineeship.

#### 2.2.4 Additional evidence on traineeships: socio-demographic characteristics

Evidence on socio-demographic and job-level characteristics of trainees(hips) is available from existing studies<sup>63</sup> and surveys (Eurobarometers 2013 and 2023). However, the results are often either outdated or incomplete. The EU-LFS can address these shortcomings for **paid traineeships** as it provides detailed and comparable evidence on a wide range of socio-demographic characteristics of trainees. Of particular interest are gender, age, education, citizenship, degree of urbanisation, as well as the composition of traineeships by occupation, sector and firm size. A detailed description regarding each of these characteristics, including figures and tables that support the evidence discussed in this section, can be found in Annex 1.5. Below, we provide a short synthesis of the key messages. A description of the variables of interest in the EU-LFS is available in Annex 3 Table 40.

From the rich information extracted at EU27 level, it is possible to identify profiles for **paid trainees and traineeships**. **Paid trainees** tend to be young (80% are below the age 30) and belong to rather advantaged groups on the labour market. More precisely, they are more likely to be men<sup>64</sup> and to have a high level of education (more than 85% have at least completed higher secondary education). Furthermore, they tend to live in more urban areas (more than 40% reside in cities) and usually do their traineeships in services or in high-skilled occupations rather than manual ones. Paid traineeships are also more common in the service sector and in larger firms (more than 40% in medium to large firms). This profile is particularly relevant to describe MPT, but also, to a lower extent, ECT and OMT. ALMP traineeships stand out as they are characterised by an opposite profile with a higher prevalence of trainees from more disadvantaged backgrounds. ALMP traineeships are also more likely to take place in the industrial sector or in small firms.

The differences between the four types of traineeships also reflect more “structural” characteristics of traineeships. For instance, MPT always require a high level of education given that they tend to take place after university, and ECT can be organised as part of

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62 See section above and more specifically: <https://ec.europa.eu/eurostat/documents/EULFS-Database-UserGuide.pdf>.

63 EC (2012). Study on a comprehensive overview on traineeship arrangements in Member States: Final Synthesis Report. Luxembourg: Publications Office of the European Union; EC (2023a). Evaluation of the Council Recommendation on a Quality Framework for Traineeships, SWD(2023) 9 final; Ecorys (2023). Study supporting the evaluation of the Quality Framework for Traineeships. Luxembourg: Publications Office of the European Union.

64 The distribution of trainees by gender is close to even at EU27 level, but the descriptive evidence and the estimation results discussed in Annex 1.5 tend to support the underrepresentation of women among paid trainees. The main explanation for this result is that traineeships tend to take place in service sectors in which women make-up the largest share of employment (e.g. Health and Education). Hence, women should account for the largest share of paid trainees to reflect the pattern of gender sectoral segregation, which stands in contrast to the gender balanced composition actually reported. See Annex 1.5 for a discussion on gender and sectoral segregation.

higher education studies, with institutions often located in more urban areas. Similarly, disadvantaged groups constitute the main target of ALMP, and it is therefore expected that the population of trainees benefiting from such policies would correspond to this target. Nevertheless, ALMP traineeships appear as important traineeships to ensure that individuals with diverse and less favourable backgrounds get access to paid traineeships.

Based on data from the Eurobarometer 2023, information on the socio-demographic characteristics of unpaid trainees can also be derived. However, it should be noted that the Eurobarometer 2023 sample cannot be seen as representative of wider population characteristics to the same extent as the data based on the EU-LFS. Therefore, the data should be interpreted with caution. According to the Eurobarometer 2023, the population of unpaid trainees is skewed towards women at EU level. This contrasts with paid trainees in the Eurobarometer, where men make up a larger share of the population. Overall, unpaid trainees are younger than paid trainees, but there is significant variation in these patterns across MS. Similarly to paid trainees, unpaid trainees are rather highly-educated, with the majority in either post-secondary non-tertiary education or tertiary education. Finally, turning to urbanisation, across the EU27, the largest share of unpaid trainees are from a small or medium town or a large town/city.

### 2.2.5 Paid traineeships and the COVID-19 pandemic

The COVID-19 pandemic constituted a major economic shock but EU labour markets were resilient and did not show major signs of decline, partly because of the use of job retention schemes and the broadening of their scope to non-standard forms of employment<sup>65</sup>. Nevertheless, particular groups of individuals may have been affected to a greater extent during the pandemic<sup>66</sup>. These include young employees<sup>67</sup> whose work tends to be concentrated in more exposed sectors<sup>68</sup>. In line with this evidence, panel a) in Figure 6 indicates that the stock of employees aged 15-34 decreased by 3.8% in 2020, more than twice the rate for employees aged 15-64 (-1.5%).

In addition, young (potential) trainees are likely to have been affected by the disruption in the supply and demand of traineeships. School closures and containment measures (which were heterogeneous across MS) are likely to have affected the traineeship supply<sup>69</sup>. Furthermore, temporary (fixed-term contract) employees, which includes trainees, are more likely to lose their jobs during recessions<sup>70</sup>. Finally, it is unclear whether trainees benefitted from job retention schemes during the pandemic<sup>71</sup>. Given the important role that these schemes played in cushioning labour market fluctuations during the COVID-19 pandemic, the exclusion of trainees could have been particularly detrimental for this group of workers.

This section briefly presents some evidence of the evolution of paid traineeships between 2019 and 2020 using EU-LFS data (Figure 6). It is important to remember that the quality

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65 Corti, F., Ounnas, A., & De La Ossa, T. R. (2023). Job retention schemes between the Great Recession and the COVID-19 crises. Technical report, CEPS.

66 Montenovio, L., Jiang, X., Lozano-Rojas, F., Schmutte, I., Simon, K., Weinberg, B. A., & Wing, C. (2022). Determinants of disparities in early COVID-19 job losses. *Demography*, 59(3), 827-855; Reichelt, M., Makovi, K., & Sargsyan, A. (2021). The impact of COVID-19 on gender inequality in the labor market and gender-role attitudes. *European Societies*, 23(sup1), Alon et al., 2020.

67 See <https://www.ilo.org/publications/preventing-exclusion-labour-market-tackling-covid-19-youth-employment>.

68 Stewart, A., Owens, R., O'Higgins, N., & Hewitt, A. (2021). Internships: A policy and regulatory challenge. Edward Elgar Publishing/ International Labour Organization.

69 Ibid.

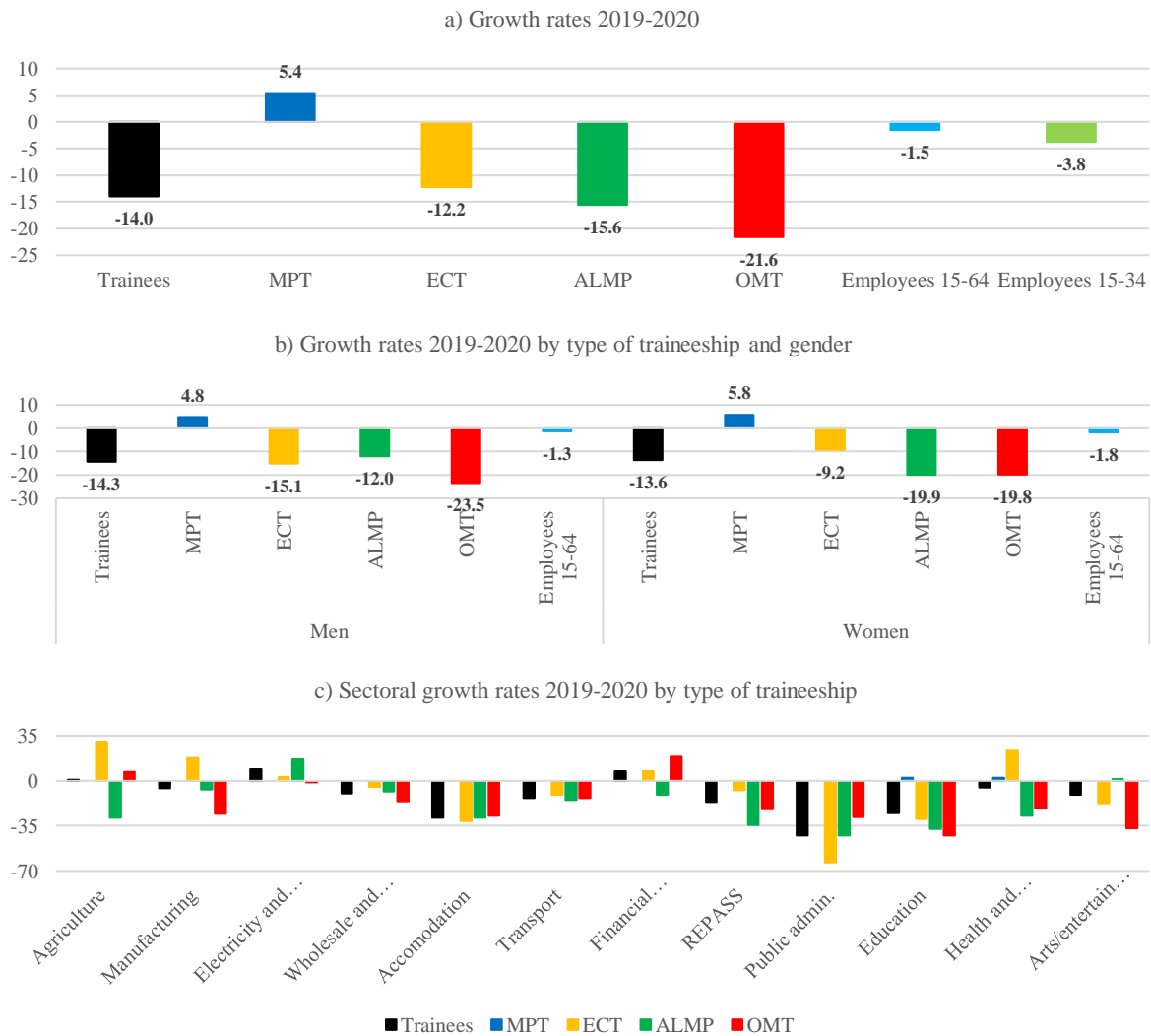
70 Bachmann, R., Bechara, P., Kramer, A., & Rzepka, S. (2015). Labour market dynamics and worker heterogeneity during the Great Recession—Evidence from Europe. *IZA Journal of European Labor Studies*, 4(1), 1-29.

71 The EP resolution of 8 October 2020 on the Youth Guarantee called for MS to make use of the financial assistance provided by the temporary Support to mitigate Unemployment Risk in an Emergency (SURE) to support trainees, through measures such as income support and job retention schemes, but it is unclear whether MS did so. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52020IP0267>.

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

of the data has been affected by a major disruption to data collection in the first part of 2020. As a result, statistics should be analysed with care and only evidence at EU27 level is considered.

**Figure 6: Employment and traineeships during the Covid-19 pandemic**



Source: Authors' estimation based on EU-LFS. Yearly growth rates are expressed in percentages. The growth rate for MPT is only shown for the education and health sectors. See Table 16 for details on the NACE classification.

Panel a) in Figure 6 provides some first evidence that traineeships were particularly affected during the pandemic. The stock of trainees decreased by 14.0% between 2019 and 2020, compared to a decrease of 3.8% in the number of employees aged 15-34. The stock of trainees decreased for all types except MPT (respectively, -12.2%, -15.6% and -21.6% for ECT, ALMP and OMT). Male trainees appear to have been slightly more affected than female trainees (-14.3% and -13.6% in panel b of Figure 6). This is the case for ECT and OMT, but the stock of female ALMP trainees decreased much more than for men. Finally, panel c) shows that paid traineeships in the service sectors (e.g. accommodation, public administration) decreased substantially in 2020. This is consistent with evidence that the service sector was particularly affected during the Covid-19 pandemic<sup>72</sup>. Within the service sector, the decreases have been substantial in the public

<sup>72</sup> Hijzen, A., & Salvatori, A. (2022). The impact of the COVID-19 crisis across different socio-economic groups and the role of job retention schemes-The case of Switzerland.

administration (-42.6%)<sup>73</sup>, accommodation (-28.8%) and education (-25.3%) sectors. This is indicative of a substantial negative impact of the COVID-19 pandemic on paid traineeships, which likely contributed to the particular hardship experienced by the youth during the pandemic.

## 2.3 What is/are the problems?

The three key problems identified by this study (see problem tree illustration in Figure 7) are:

- P1: Problematic use of traineeships
- P2: Traineeships of poor quality
- P3: Unequal access to traineeships

The identification and analysis of the problems build on available evidence on traineeships in the EU, especially on the EC (2023a) QFT evaluation<sup>74</sup> and the associated Ecorys (2023) support study<sup>75</sup>, new and existing empirical and legal evidence, as well as stakeholder views. **From this point of the study, the full reference to the evaluation and its support study (i.e. EC, 2023a and Ecorys, 2023) are no longer included in footnotes for space-saving reasons.**

The consequences of the three problems are presented together in Section 2.4 and the problem drivers in Section 2.5.

### 2.3.1 P1. Problematic use of traineeships

Problematic use of traineeships includes traineeships not complying with EU or national law, and misuse of traineeships, whereby traineeships are used to replace regular (entry-level) employment (see Section 2.1.2)<sup>76</sup>. In practice, problematic use is difficult to document and quantify. Even labelling traineeships as “misused” is difficult, particularly where no legal definition of traineeships exists (e.g. IE, AT)<sup>77</sup>. To identify misuse, in principle requires a factual assessment of the individual contractual relationship, which can only be done in individual cases and before specific authorities<sup>78</sup>. Similar procedures would apply to identifying traineeships non-compliant with legislation. Hence, official statistics on problematic use of traineeships are not available. The evidence collected is therefore largely of qualitative nature and based on literature, a survey, and interviews.

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73 This number is largely driven by DE, where data collection was particularly affected in 2020, but it is unclear in how far these issues could explain this. Without DE, the decrease in public administration is equal to 23.6%, still among the highest decreases observed across sectors.

74 EC (2023a) Evaluation of the Council Recommendation on a Quality Framework for Traineeships, SWD(2023) 9 final, available [here](#).

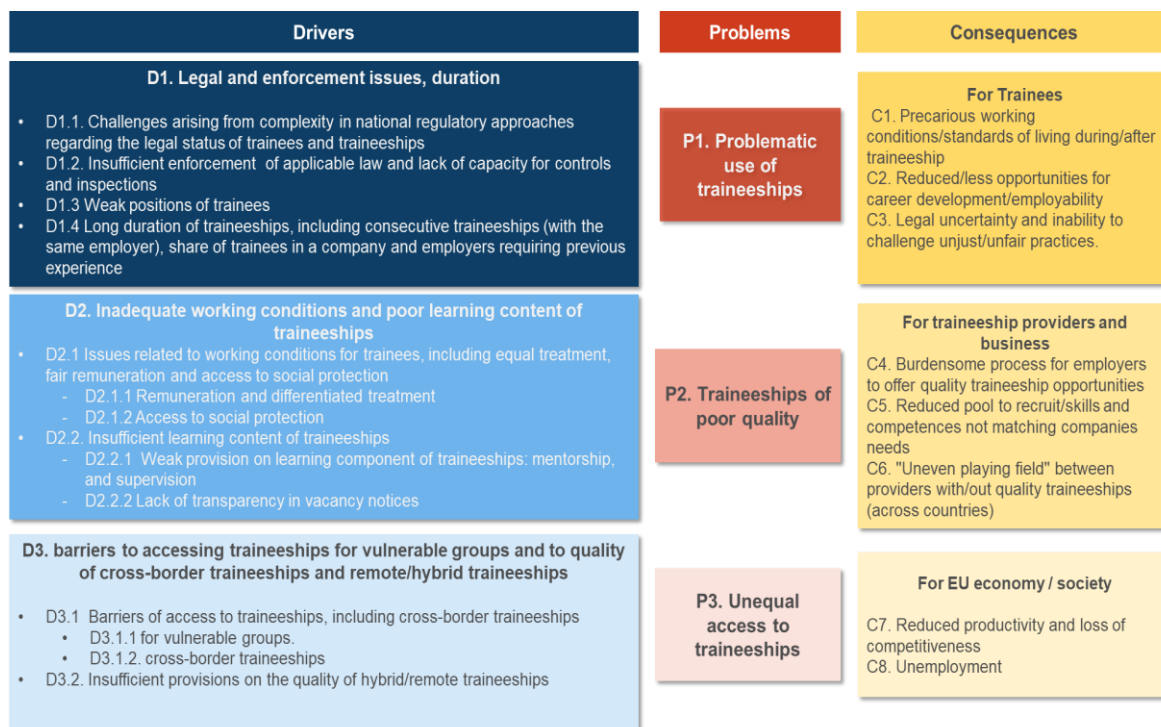
75 Ecorys (2023). Study supporting the evaluation of the Quality Framework for Traineeships. Luxembourg: Publications Office of the European Union, available [here](#).

76 There is no commonly agreed definition of what would constitute a ‘problematic’ use of traineeships in the EU27. Eurofound (2017), Fraudulent contracting of work: Abusing traineeship status (Austria, Finland, Spain and UK), Eurofound, Dublin.

77 Eurofound (2017), Fraudulent contracting of work: Abusing traineeship status (Austria, Finland, Spain and UK), Eurofound, Dublin.

78 Eurofound (2016) Exploring the fraudulent contracting of work in the European Union, Eurofound, Dublin.

Figure 7: Problem tree



### 2.3.1.1 Non-compliance and misuse of traineeships

On the first issue, non-compliance of traineeships with national or EU law, available literature and evidence is scarce. However, a recent European Youth Forum (YFJ) report<sup>79</sup> does detail instances of non-compliance in several EU MS, based on desk research and input from national youth councils. The report focuses on seven MS (BG, DE, IE, FR, HR, AT and RO) and trainees' rights relating to remuneration. It documents several instances of non-compliance. For instance, unpaid traineeships outside university are illegal in FR but do occur on "rare occasions", while in RO, legislation against unpaid OMT traineeships is circumvented by employers who occasionally advertise unpaid positions.

Similarly, due to the limitations mentioned, there is little evidence available on the scale of problematic use of traineeship. The concept has gained attention following a complaint lodged in 2017 with the European Committee of Social Rights (ECSR) by the YFJ on issues of unpaid and problematic of traineeships in BE. In response, the ECSR concluded "that in cases where an internship concerns performance of real and genuine work ("bogus internships"), the intern should be considered as "worker" and Article 4§1<sup>80</sup> applies in this context". This implies that "unpaid interns are discriminated against Article E (which prohibits any form of discrimination) in conjunction with Article 4§1"<sup>81</sup>. As ECSR judgments have legal force and binding effect on countries that have ratified the European Social Charter (EU MS are signatory countries), BE is expected to comply with the decision. Furthermore, the judgment sets a legal precedent, which can be cited in domestic and international courts to support other claims.

79 European Youth Forum (2022). High Quality or Unpaid and Unregulated? Uncovering National Internship Policies in Europe.

80 The article claims the right of workers to a remuneration that will give them and their families a decent standard of living.

81 <https://www.coe.int/european-social-charter/the-decision-on-the-merits-in-european-youth-forum-yfj-v-belgium-complaint-no-150-2017>.

Results from a survey of public authorities conducted for this study also suggest that the problem exists. 45% of public authority representatives surveyed (N=38) stated that in their country, the replacement of regular employment by traineeships is somewhat or very common. In IT, NL, AT, PT and SK (some of these countries are also indicated by the Eurofound (2016) study described below)<sup>82</sup>, the problem is common. Five others<sup>83</sup> are also reportedly affected to some extent: BG, ES, HR, LU and PL. Public authorities, who are in charge of monitoring such practices, are well-positioned to provide insight into the extent to which misuse of traineeships constitutes a problem in the EU.

Some studies further support the survey findings. A 2016 Eurofound study<sup>84</sup> investigates the fraudulent contracting of work, defined as a specific employment or contractual arrangement used to hire workers or subcontract work activities, where the factual circumstances of the relationship do not correspond to the legal or formal requirements for that form of work. The study relied on reports of national labour inspectorates, ad-hoc surveys and studies, as well as an analysis of the public debate. Out of 29 countries, the fraudulent use of traineeships and apprenticeships was significant in 11 (EL, FR, IT, CY, NL, AT, PT, RO, SI as well as the UK and NO), and most reported in the tourism and catering sectors. Notably, the number of trainees in the accommodation sector (which includes tourism and catering) is high in EL and AT and very high in IT<sup>85</sup>. This suggests that the number of trainees potentially exposed to fraudulent practices may be particularly high in those countries. The report also highlights how in certain countries (examples named are FR, AT and CY), some employers use apprentices and trainees as regular workers, without providing the required training while taking advantage of lower labour costs.

A follow-up 2017 Eurofound study<sup>86</sup> looks specifically at fraudulent use of traineeships – excluding those regulated through labour contracts and those that are part of mandatory professional training or academic and vocational curricula. It focused on four countries (AT, FI, ES and the UK) where fraud is perceived to be more widespread<sup>87</sup>. Instances of fraud are found in all countries. In ES and FI, fraud was related to inadequacy or lack of training content, guidance and supervision compared to actual programmes. The study also identifies sectoral differences, fraudulent traineeships being particularly common in media (ES) and high-paying sectors such as banking and finance (AT), and notes that vulnerable young people such as migrants are more likely to experience fraudulent traineeships (FI).

In addition to these comparative reports, some research and case law highlights the issue of problematic use of traineeships in specific countries. In Italy, stakeholders have highlighted the increasing use of traineeships to disguise precarious forms of employment<sup>88</sup>. Furthermore, based on the legal analysis, we document 35 national case laws, in 14 MS, related to problematic traineeships. About two-thirds (26 cases) of the associated court decisions ruled in favour of the trainee, confirmed the presence of the problematic use of the traineeship and entailed a reclassification of the traineeship

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82 Eurofound (2016) Exploring the fraudulent contracting of work in the European Union, Eurofound, Dublin.

83 It is important to note that further comparison proves problematic as authorities in three countries noted by that study (FR, EL, SI) submitted no replies. Out of the nine EU countries listed by Eurofound, only CY authorities noted that the issue was not common. However, this is only based on one response which is insufficient to conclude that the results of the study no longer hold.

84 Eurofound (2016) Exploring the fraudulent contracting of work in the European Union, Eurofound, Dublin.

85 According to the EU-LFS paid trainees, who are the only ones we can track by sector, in the accommodation sector in IT is more than 4 times the EU average. In EL and AT just at the EU average (which is strongly driven by IT and PL).

86 Eurofound (2017) Fraudulent contracting of work: Abusing traineeship status (Austria, Finland, Spain and UK), Eurofound, Dublin.

87 The report cites 'country experts' and 'national stakeholders' as the source for this assumption without further specifying.

88 The main trade union confederations (Cgil 2020) and other social actors such as the National Youth Council highlighted this issue, see Jessoula, M., Pavolini, E., Natili, M. and Raitano, M. (2022) ESPN Thematic Report on Access to Social Protection for Young People – Italy.

agreements and/or compensation. Box 1<sup>89</sup> provides an illustration of case law successfully pursued in labour courts, in Germany. Lastly, in the judgment of the ECSR in the YFJ v. Belgium, mentioned above, the committee, by explicitly referring to “bogus internships”, also concluded that the Labour Inspectorate has proven to be inefficient in detecting and preventing abusive replacement of paid jobs with unpaid traineeships.

### **Box 1: German cases against employers misusing a traineeship\***

In Germany, an intern (Praktikant) is an individual engaged in a temporary in-company training relationship under an internship contract. This prepares them for their primary occupation. The primary goal is to acquire practical knowledge and experience in a specific field of work. This is explicitly distinct from vocational training, which involves systematic vocational training and vocational school lessons and examinations. It is also separate from traineeships (Volontariat), which involve additional training which can be voluntarily undertaken to gain experience in specific professions.

#### **Example of the reclassification of an internship as an employment relationship**

In 2016 the Regional Labour Court Berlin-Brandenburg affirmed the existence of an employment relationship for an intern who initiated a lawsuit seeking compensation equivalent to an editor's salary, minus remuneration received during the internship. Building on the definition in the Minimum Wage Act (Mindestlohngesetz, MiLoG) that an internship is ‘temporary’, the Court concluded that a one-year full-time internship was no longer ‘temporary’ and affirmed the existence of an employment relationship. The Court applied BGB section 612(1) and awarded the plaintiff the collectively agreed wage.

#### **Invalidity of the agreed remuneration and presumption of reasonable remuneration**

According to the Vocational Training Act (Berufsbildungsgesetz, BGB section 612(1)), remuneration is implicitly agreed upon if, under the given circumstances, it is reasonable to expect compensation for services provided. This provision's purpose is ensuring that any service with a monetary value entitles providers to the corresponding remuneration, including interns. In 2015, the Federal Labour Court ruled that an intern who delivers services of greater value than those stipulated in the internship contract can demand compensation equivalent to that higher value. In this specific case, the Court ordered the payment of €8000 in compensation, though an unpaid internship had originally been agreed upon.

\*This box builds on Waas (2021) Rights and obligations in the context of internships and traineeships: A German perspective, in: ILO (2021) Internships, Employability and the Search for Decent Work Experience.

As highlighted above, in practice, an operational definition of problematic traineeships does not exist, and the existence of misuse can only be ascertained by a labour court. However, potential indications of problematic cases can be identified. First, the 2014 QFT highlights key elements of “genuine” traineeships (Section 2.1.2), including their limited duration, the learning component and their role in the development of experience to facilitate labour market integration. Divergence from these elements may be a sign of problematic use. Based on available literature<sup>90</sup> and the case law described above, as well as interviews conducted with stakeholders – including trade unions, employer associations, and youth organisations –, a number of concrete indications of problematic use of traineeships have been identified. These include:

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89 Waas (2021) Rights and obligations in the context of internships and traineeships: A German perspective, in: ILO (2021) Internships, Employability and the Search for Decent Work Experience.

90 Eurofound (2017) Fraudulent contracting of work: abusing traineeship status (Austria, Finland, Spain and the UK), Eurofound, Dublin.



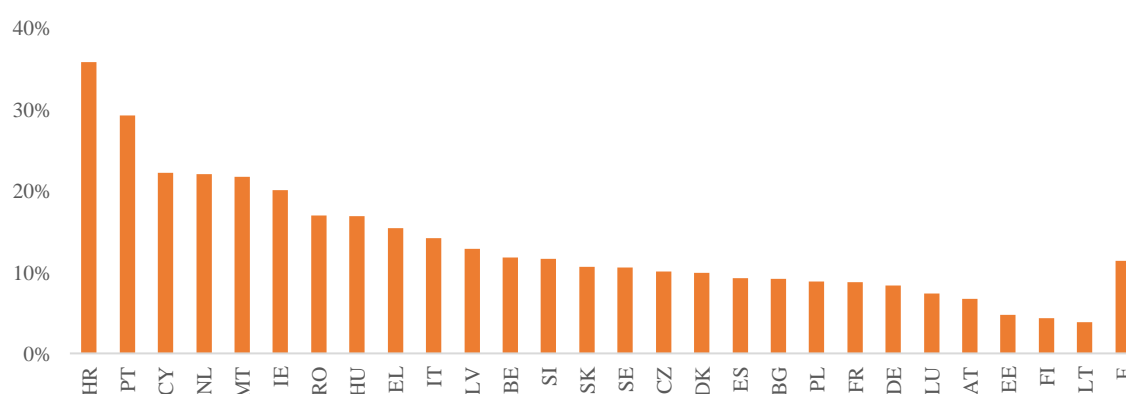
- excessively long duration or consecutive traineeships with the same traineeship provider;
- the trainee performs activities with the same intensity as a regular employee and/or has the same/similar responsibilities;
- lack of a structured learning/training component;
- the trainee already has experience in a certain field of activity due to the completion of previous traineeship(s) and/or previous regular job positions
- high ratio of traineeships compared with regular employment in the organisation.

Importantly, the presence of one or more of these indications by itself is not necessarily proof of a problematic traineeship. Each of the indications would have to be assessed on a case-by-case basis and the existence of only one indication is not sufficient. However, a combination of several indications may be considered as stronger - though not definitive - proof of the presumption of a problematic traineeship. In the following, we present available evidence and data on the various indications of problematic traineeships.

### 2.3.1.2 Excessive duration and repeated traineeships

The Eurobarometer 2023 data can be used to substantiate the indication of issues related to the duration. Figure 8 shows the proportion of respondents who indicated that their last traineeship lasted more than six months. While the EU average is relatively low (11%), and down from 15% in the 2013 Eurobarometer, there is large variation in the prevalence of long traineeships across the EU. In IE, HR, CY, NL, MT and PT, 20% or more of respondents indicated that their last traineeship lasted more than six months. It should be stressed that this does not imply that all these long traineeships constitute a case of problematic use of traineeships. For instance, in many countries, MPT last longer than six months by law (e.g. for medical professions) and the long duration of ALMP may be justified by the target group of such traineeships. ALMP trainees are usually individuals from more disadvantaged groups (e.g. low level of education, see Section 2.2.4), who are typically further away and less attached to the labour market. Thus, a traineeship with a duration longer than six months might be justified to ensure that the person can (re-)integrate the labour market with sufficient experience.

**Figure 8: Share of individuals whose last traineeship lasted more than 6 months**



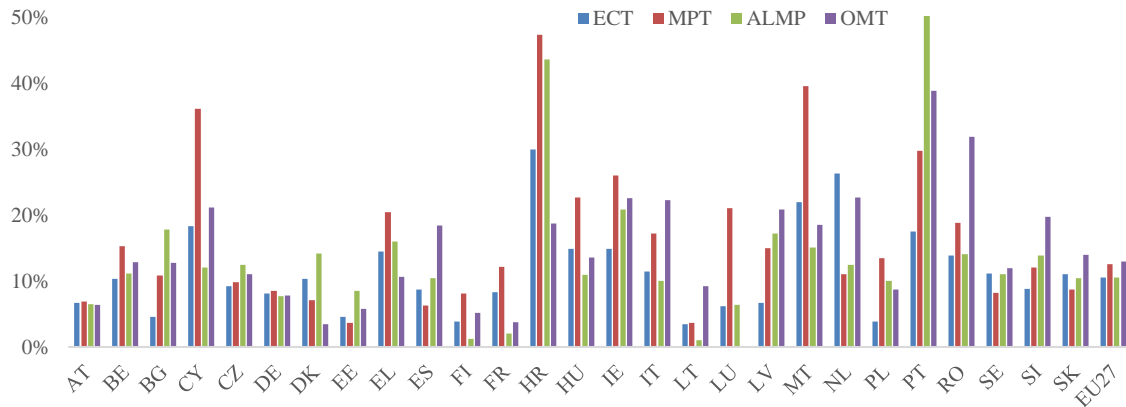
Source: Eurobarometer 2023.

Figure 9 shows the share of traineeships lasting longer than six months by type of traineeship across countries, using data from Eurobarometer 2023. In half of EU countries (AT, BE, CY, DE, EL, FI, FR, HR, HU, IE, LU, MT, PL) the share of long traineeships is largest among MPT. In BG, CZ, DK, EE and PT it is largest among ALMP traineeships. However, there are eight countries (ES, IT, LT, LV, RO, SE, SI, SK) where the proportion

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

of long traineeships is highest among OMT. NL is the only country where ECT show the highest share of long traineeships.

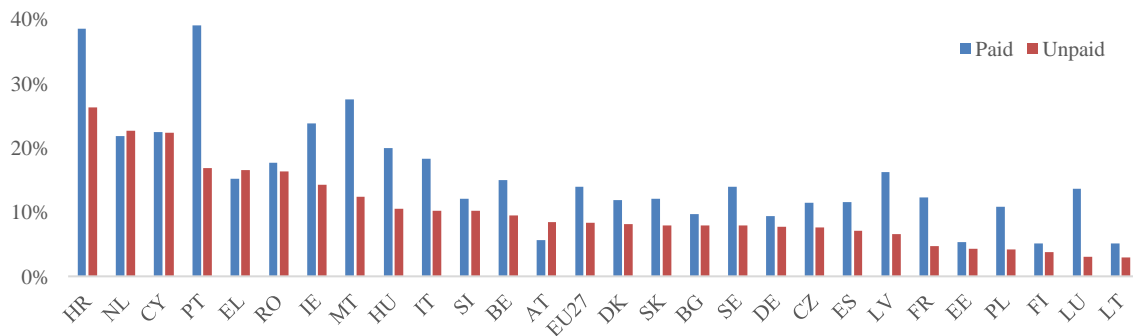
**Figure 9: Share of traineeships lasting longer than six months by type**



Source: Eurobarometer 2023.

There are also differences in the incidence of traineeships longer than six months between paid and unpaid trainees. As shown by Figure 10, at EU27 level, 14% of paid trainees indicated that their traineeship lasted longer than six months, compared to 8% of unpaid trainees. The incidence of traineeships longer than six months among paid trainees is highest in PT (39%), HR (38%), MT (28%), IE (24%), CY (22%), NL (22%) and HU (20%). There is largely an overlap with the countries which have the highest rates of long unpaid traineeships. These are HR (26%), NL (23%), CY (22%), PT (17%), EL (16%), RO (16%), IE (14%), MT (12%) and HU (11%).

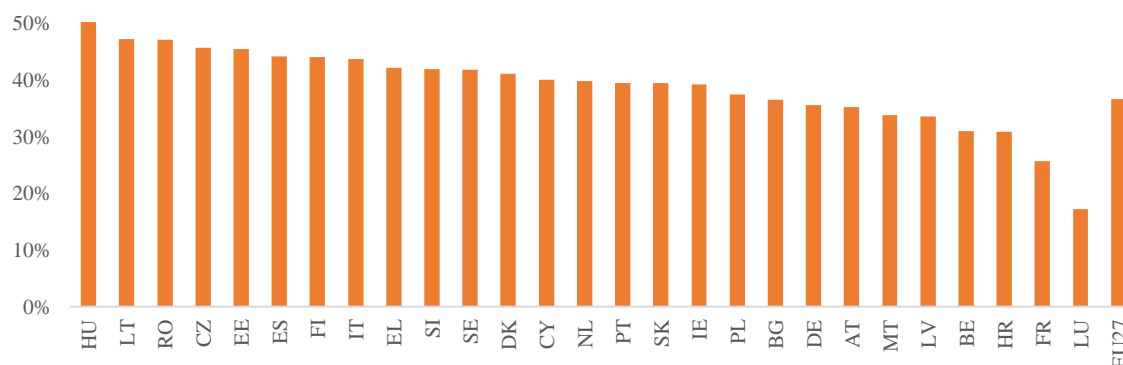
**Figure 10: Share of trainees whose traineeship lasted longer than six months**



Source: Eurobarometer 2023.

Besides their length, a second potential indication of problematic traineeships is the undertaking of multiple traineeships with the same employer. According to the 2023 Eurobarometer data shown in Figure 11 almost 40% of the respondents claim to have experienced multiple traineeships with the same organisation. While there is some country variation (though not as striking as in the case of long traineeships), 11 countries (CZ, DK, EE, EL, ES, IT, LT, HU, SI, FI and SE) exhibit a share higher than 40% and with the exception of FR and LU, they are all above 30%. This suggests that multiple traineeships with the same employer are quite widespread. The Eurobarometer data also indicate that at the EU27 level, multiple traineeships with the same employer are most common for MPT (45.7%) and least common for OMT (25.7%), with the other types of traineeships in between those values (ECT 34%, ALMP 35.2%).

Figure 11: Trainees' share with more than one traineeship with the same employer



Source: Eurobarometer 2023.

Importantly, consecutive traineeships with the same employer are not necessarily an issue if the duration is limited, e.g. two consecutive traineeships of less than three months. Furthermore, the fixed-term work directive - aiming to prevent the misuse of successive fixed-term contracts - applies to trainees holding worker status under EU law<sup>91</sup>. In this sense, while consecutive or multiple traineeships with the same employer may point to a problematic situation, (long) duration appears as the most relevant aspect.

### 2.3.1.3 Activities with the same intensity as a regular employee and previous experience

Stakeholders interviewed, including trade unions, employer associations and youth organisations, emphasised that there should be a clear distinction between tasks and activities undertaken by trainees and regular employees. Trainees carry out less specialised tasks, have a lighter workload, are supervised more closely, and are not expected to meet specific productive objectives, the primary purpose of a traineeship being learning. The absence of this distinction may indicate the existence of a problematic traineeship. In practice, the extent to which trainees perform duties comparable or equivalent to regular employees can only be assessed case-by-case and reported anecdotally. Information collected by labour inspectors, in charge of assessing cases, is covered by strict confidentiality rules<sup>92</sup>, so detailed information is extremely limited.

### 2.3.1.4 Lack of a structured learning/training component

According to all stakeholders interviewed, learning is a crucial element of traineeships. A structured learning component includes clearly defined objectives and supervision. While the absence of a learning element per se does not automatically imply problematic use of a traineeship (it can be a poor-quality traineeship, see Figure 1), poor learning content combined with a high intensity of activity comparable to employees is likely to be associated with misuse. This is difficult to measure statistically, but the quality of learning can be cross-referenced with other factors.

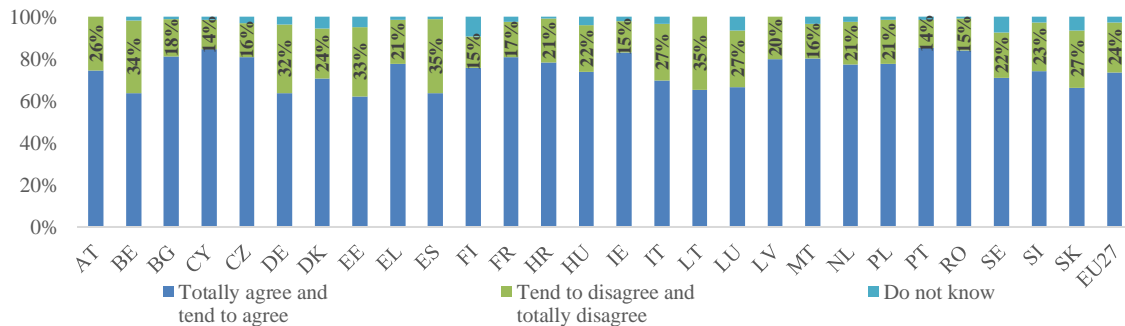
Specifically, the learning element can be cross-referenced with traineeship duration. While a long traineeship could be reasonable if its learning content is high and it promotes labour market integration, a combination of low learning content and long duration is likely to be associated with problematic use of traineeships. According to the Eurobarometer 2023, 15.5% of respondents who undertook a traineeship longer than six months stated that they did not learn professionally useful things. This is lower than the corresponding

<sup>91</sup> Unless the respective MS made use of the possibility to exclude them.

<sup>92</sup> See ILO guide on how the labour inspectorate should protect personal and business privacy: <https://www.ilo.org/wcms/537155.pdf>.

share among those who did a traineeship of three to six months (20.5%) or one to three months (22.9%), but constitutes a significant share. Moreover, an even larger share of trainees who did a traineeship of more than six months (23.9%) disagreed that their traineeship was of help to find a job (Figure 12), though this is somewhat lower than for trainees who undertook traineeships of three to six months (27.2%) or one to three months (33.6%). In BE, EE, and ES about one in three claimed that the traineeship was not useful to find a job, despite the length.

**Figure 12: Traineeships lasting more than 6 months and usefulness to find a job**



Source: Own elaboration on Eurobarometer 2023. Based on questions Q4 and Q13-2: "This traineeship was or will be helpful for you to find a regular job"

### 2.3.1.5 High ratio of trainees relative to employees

An excessive resort to trainees, especially a high number of trainees relative to the total number of employees within one company, could point to the substitution of employees with trainees and suggest that certain tasks in the company are routinely done by trainees. In practice, it is impossible to find systematic evidence of this behaviour, which remains limited to anecdotal evidence. It is also important to note that the sector (because of differences in the degree of labour intensity) matters in defining a meaningful threshold of potential problematic use of traineeships, but even more so company size. For micro companies, the ratio of trainees to employees will always be a double-digit one (at least one in nine), for large companies the same percentage could imply thousands of trainees. Hence, a sensible threshold is difficult to identify. However, the fact that some MS apply caps can be seen as an indication that a disproportionate number of trainees in a company is indicative of problematic traineeships. This can be defined as the share of employees, like in FR, where trainees cannot constitute more than 15% of employees for companies with more than 20 employees. In LT, the limit exists for voluntary traineeship agreements and the percentage may not exceed 10% of the number of employees, and where the organisation has fewer than 10 employees, they may have only one voluntary traineeship agreement. In other countries, like HU, the cap is set in relation to the number of trainees and apprentices in the previous year (see Table 6 for a full mapping).

### 2.3.2 P2. Traineeships of poor quality

Poor quality can result from several factors. In the following, 'quality' traineeships are operationalised looking at two key aspects: working conditions and the learning component. Drivers affecting them are described in detail in the section on drivers (notably D1 and D2 discussed in Sections 2.5.2 and 2.5.3).

The concept of working conditions includes many factors like remuneration, access to social security, health and safety, and hours worked. The following focuses on remuneration, social protection, whether trainees' working conditions are comparable to those of employees and the learning content of traineeships.

### 2.3.2.1 Pay

In 2019, the estimated number of paid traineeships, across all traineeships in the EU, was about 1,6 million, while unpaid trainees were just below 1,5 million (see Section 2.2.2). This implies that about 48% of all trainees were unpaid, a figure similar to the Eurobarometer 2023, where 45% of respondents claimed that their last traineeship was unpaid. As stressed above, the two sources are very different and samples cannot be compared but the fact that the shares are similar reinforces the conclusion. Looking at remuneration by type of traineeship, the Eurobarometer shows that a large share of ECT (52%) and OMT (42%) traineeships are unpaid, followed by ALMP (38%) and MPT (35%). This is only partially in line with the EU-LFS, according to which the share of unpaid trainees is higher for ECT (more than 70%) and lower for OMT and ALMP (close to 25% and 12%, see Figure 5), while there is an assumption that MPT are never unpaid<sup>93</sup>. A key aspect that can explain the difference is that in the EU-LFS, grants, fellowships and other forms of financial support that are unrelated to the productive work of the trainee are not considered pay. This distinction is not included in the Eurobarometer, and it may explain the larger share of unpaid ECT. Indeed, ECT trainees often benefit from financial support attached to their status of students.

In practice, it is very difficult to have accurate data on whether, and which, trainees are paid as legal provisions on the obligation to remunerate trainees are very different across MS and types of traineeships and, when they exist, their applicability is often unclear. Even more difficult is establishing a full picture of the level of remuneration, when it is regulated only in some MS and for some types of traineeships, and most often left to the discretion of the traineeship provider (for more details, see remuneration section under D2 in Section 2.5.3).

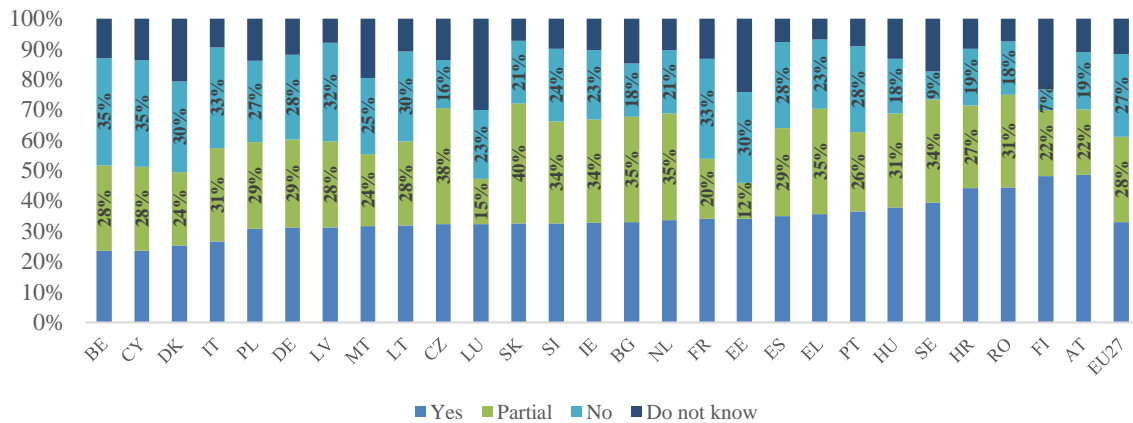
### 2.3.2.2 Access to social security

Social protection, which acts as a safeguard against the financial consequences of social risks, is a defining feature of working conditions but collecting evidence is difficult. The Eurobarometer 2023 is the main source of information (Figure 13). Across the EU, 27% of respondents reported having no access to any branches of social protection, and 28% only partial access, during their last traineeship. In 12 MS (BE, DE, DK, EE, EL, FR, IT, CY, LV and PT) the share of those claiming no access is higher or equal to the EU average. BE and CY rank at the bottom, with 35% responding no access and 28% only partial. On the other end, the respective figures for Finland are 7% and 22%. In addition, there is a large discrepancy in access between paid (73.6% at EU level) and unpaid trainees (25.4% at EU level).

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<sup>93</sup> It should be noted that data for paid traineeships is more accurate than for unpaid.

Figure 13: Access to social protection during the last traineeship (%)



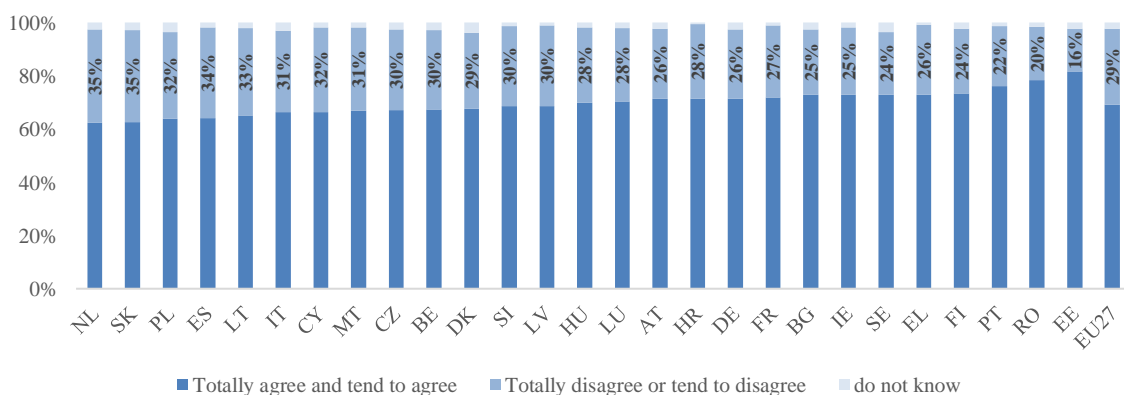
Source: Own elaboration on Eurobarometer 2023, Q16

### 2.3.2.3 Differences in working conditions between trainees and regular employees

The Eurobarometer survey also asked whether trainees' working conditions, i.e. working hours, workload, treatment, and access to equipment, were equivalent to those of regular employees (Figure 14). These aspects capture whether trainees were offered an adequate environment in which to develop skills<sup>94</sup>.

29% of respondents indicated that their situation was not comparable to regular workers, an increase from 2013 (20%). In 2023, 13 MS had a higher than average share of respondents (BE, CZ, DK, ES, IT, CY, LV, LT MT, NL, PL, SI, SK) who noted that their situation was not comparable to regular workers, peaking in the Netherlands at 35%. The share is significantly higher for those who received payment or financial compensation (59.6%) than for those who did not (39.3%). Overall, this indicates a considerable share of trainees who were not benefitting from conditions equivalent to regular employees, with unpaid trainees being more likely to be disadvantaged.

Figure 14: Trainees' working conditions compared to employees



Note: Own elaboration based on the Eurobarometer 2023. Constructed from the question: "Apart from your pay, were your working conditions equivalent to those of regular employees?" 'Totally agree' and 'tend to

94 See e.g. Higgins and Pinedo Caro (2023) What makes for a 'good' internship? in: ILO (2021) Internships, Employability and the Search for Decent Work Experience; EPRS (2022) The quality of traineeships in the EU. European added value assessment.

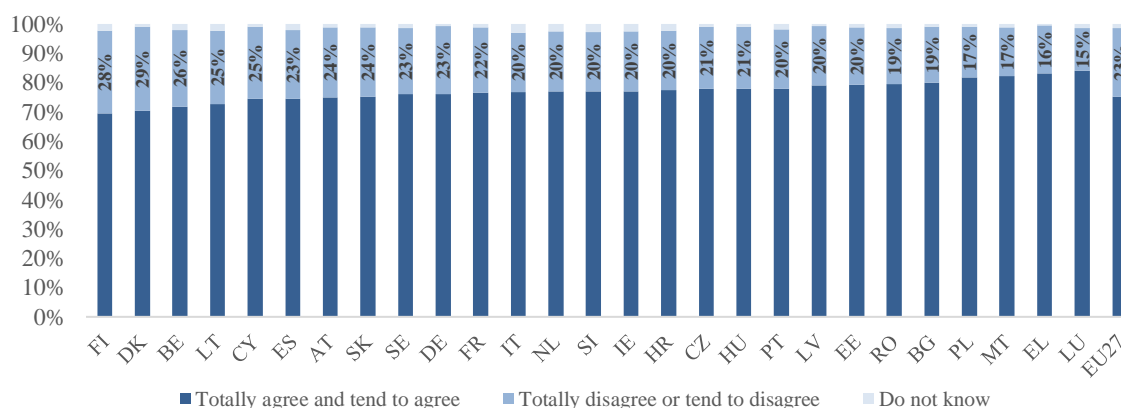
agree' replies have been merged, as well as 'totally disagree' and 'tend to disagree'. MS are ordered based on the respondent that totally agrees and tends to agree, lowest to highest percentage.

### 2.3.2.4 Learning content

Learning and training form a critical part of traineeship quality. The findings from the EC (2023a) evaluation of the QFT suggest that young people experienced improvements in quality by gaining learning experience and skills, increasing their chances of entering work. Among the QFT principles, the most relevant for supporting future employment are associated with learning objectives and the existence of a written agreement, both of which are closely intertwined with learning and training content. However, deficiencies still exist in relation to traineeship learning content. The Eurobarometer 2023 indicates that 22% of respondents claimed that they did not learn professionally useful things during their traineeship. This represents an increase from 10% in 2013<sup>95</sup>. The percentage of respondents is highest for OMT (26.9%), followed by ALMP traineeships (25.6%). MPT (22.4%) and ECT (20.2%) perform slightly better. The proportion of trainees who learned professionally useful things is higher among paid (27%) than unpaid (18%) trainees. As such, there could be a relationship between lack of pay for a traineeship and low quality of learning content<sup>96</sup>.

Moreover, having a supervisor, as well as a mentor is a critical part to help ensure proper learning for the trainee. A supervisor or line manager is formally in charge of the trainee, and a QFT principle recommends the assignment of such supervisor. However, ensuring good quality learning requires involvement and assistance from a mentor, who should provide help and advice and actively follows the trainees' progress in conducting their tasks<sup>97</sup>. The comparison of the results of the Eurobarometer 2013 and 2023 reveals a 16 percentage points drop (from 91% in 2013 to 75% in 2023) in the share of trainees having access to mentors. The more recent results show that in the EU, 23% had no or insufficient access to mentorship (Figure 15). This share is quite similar across the MS, denoting a limited extent of variability.

Figure 15: Mentorship during the traineeship - Eurobarometer 2023 results



Note: Own elaboration on Eurobarometer 2023, question Q13\_4 referred to the last traineeship and inquire on the possibility to turn to a mentor. Totally agree and tend to agree replies have been merged, as well as totally disagree and tend to disagree. MS ordered based on the respondent that totally agrees and tends to agree, lowest to highest percentage.

95 See Eurobarometer 2013, available [here](#).

96 See also O'Higgins, N., and Pinedo, L. (2018). Interns and outcomes just how effective are internships as a bridge to stable employment? International Labour Organization.

97 It is worth noting that the EC (2023a) 2014 QFT evaluation found that mentorship should be added as a quality element.

### 2.3.3 P3. Unequal access to traineeships

Unequal access to traineeships, and particularly high-quality traineeships, constitutes the third problem. Several issues related to access can be identified. First, access to (high-quality) traineeships may be limited for individuals from vulnerable groups. Second, access to cross-border traineeships may be restricted. Finally, a third issue are remote and hybrid traineeships, which could improve access, particularly for individuals from disadvantaged groups, but also pose new and different challenges in relation to ensuring sufficient quality of these traineeships. These issues are now discussed in turn.

#### 2.3.3.1 Access to traineeships for individuals from vulnerable groups

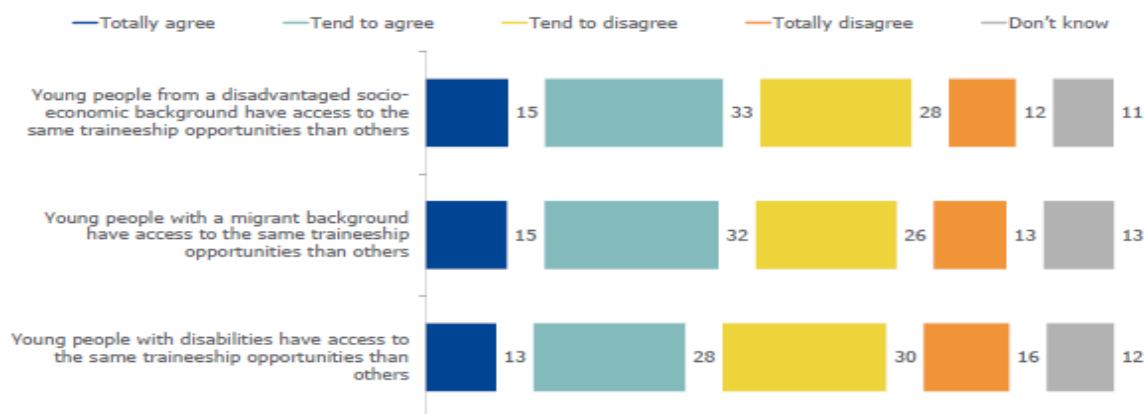
The issue of unequal access for trainees with different characteristics and backgrounds was underlined by a large spectrum of stakeholders, including national authorities, youth organisations and the European Disability Forum, in the consultation linked to the study supporting the QFT evaluation (Ecorys, 2023). Similarly, in interviews conducted for this study, trade unions, youth organisations and some employer organisations highlighted the persistence of difficulties for individuals from vulnerable groups and disadvantaged socio-economic backgrounds to participate in traineeships, particularly traineeships of high quality.

Inequality in access to traineeships affects (but is not limited to) members of vulnerable groups including migrants and people with disabilities, as well as individuals with a disadvantaged socio-economic background. This is supported by data from the Eurobarometer 2023 (Figure 16) which enquired into respondents' perceptions of inequality in access to traineeship opportunities (though not respondents' own experiences). A large share of respondents disagree or tend to disagree that young people coming from a disadvantaged socio-economic background (40%), a migrant background (39%) or with disability (46%) have equal access to traineeship opportunities (Figure 16). These results clearly point to perceived inequality in accessing traineeships, which is indicative of potential exclusion.

This average EU-level pattern is also confirmed at the national level. In seven countries (AT, BG, EE, EL, FR, IE and NL), 45% or more of respondents believe that a disadvantaged socio-economic background constitutes a barrier to equal access to traineeship opportunities. The share is not lower than 30% in any MS. With regard to migrant background, similarly, there are seven countries (BG, CY, EE, FR, LV, SI, FI) where 45% or more of respondents believe that access to traineeship opportunities is unequal, shares being higher than 35% everywhere but RO (27%). Perceptions of unequal access are particularly pronounced with regard to people with disabilities. In almost half of EU MS (BE, CY, DK, EE, EL, IE, LV, LU, PT, AT, FI, SE), 50% or more of the respondents believe that people with disabilities have reduced access to traineeships.



Figure 16: Perception of access for vulnerable groups to traineeship opportunities



Source: Eurobarometer 2023, Report, p. 48

It is difficult to collect data on actual inequality in access to traineeships. In the EU-LFS, it is not possible to find systematic evidence on whether those who undertook a traineeship belong to higher-income groups<sup>98</sup>, and hence whether individuals from low-income groups potentially face greater obstacles. However, based on the analysis, lower educational attainment<sup>99</sup> and a migrant background (as proxied by citizenship) are associated with a lower probability of undertaking a traineeship<sup>100</sup>. The data therefore provides evidence for unequal access to traineeships for lower-skilled individuals and migrants.

More specifically, as discussed in Section 2.2.4, trainees tend to have a medium or high level of education. To a large extent, this is explained by the fact that many ECT and MPT, by definition, require tertiary education attainment, hence excluding young people with lower levels of education (for whom apprenticeships are often a more suitable experience). However, the key role of education holds more broadly. Estimates suggest that the odds of being a trainee for an individual with tertiary education are six times the odds of being a trainee for an individual with a low level of education<sup>101</sup>. For individuals with a medium level of education, it is three times higher (see Table 23 in Annex 1). As regards the role of migration, estimates also suggest that the odds of being a trainee for an individual coming from another EU country are 0.7 times the odds of (so smaller than) being a trainee for those who hold the citizenship of the country where the traineeship is taking place. A similar odds also applies to third-country nationals, living in the country where the traineeship takes place<sup>102</sup>.

As already noted in the section on the socio-demographic characteristics of trainees (Section 2.2.4 and Annex 1.5), there is no clear evidence pointing to problems related to traineeships access for individuals living in more or less urbanised regions. According to data from the EU-LFS, in 2019, 45% of all paid trainees came from cities, 34% from towns or suburbs and the remaining 22% from rural areas. The results of the Eurobarometer suggest that there is no significant difference between paid and unpaid trainees in this respect (see Annex 1.5 and Annex 1.6 for detailed data).

<sup>98</sup> Information about household income level is not provided in the EU-LFS, only (ordinal) income ranges (defined by the national income distribution) are available. However, they cannot be used in a meaningful way in the analysis.

<sup>99</sup> As described in Table 40 in Annex 3, low education corresponds to less than primary, primary and lower secondary education.

<sup>100</sup> See Annex 1 for more details.

<sup>101</sup> Statistically, the odds are calculated against a reference group. For trainees the most logical reference groups are either apprentices, which are used to calculate the odds discussed in the text, and recent employees. When considering the latter, the odds of being a trainee when having a tertiary education are lower but still double those for low educated.

<sup>102</sup> We assume that trainees in a foreign country are unlikely to be part of the labour force survey in the hosting country, hence in this context third country nationals are assumed to be resident in the hosting country.

### 2.3.3.2 Cross-border traineeships

A second element of access is take-up of cross-border traineeships. Comparing results from the 2013 and 2023 Eurobarometer, take-up of cross-border traineeships increased by 12 percentage points over the past decade, with 21% of respondents in the Eurobarometer 2023 having done their traineeships abroad. The continued rise over the past decade could be taken as an indication that cross-border traineeships have not yet reached their optimal level. In interviews conducted for this study, similarly, stakeholders asserted that take-up of cross-border traineeships could be further improved. Moreover, data from the Eurobarometer indicates that there are significant differences in take-up of cross-border traineeships across countries. Countries with the lowest shares of respondents whose traineeships had taken place in another EU countries included PT (11%), EE (12%), FI (13%), HR (14%), SI (15%) and PL (15%).

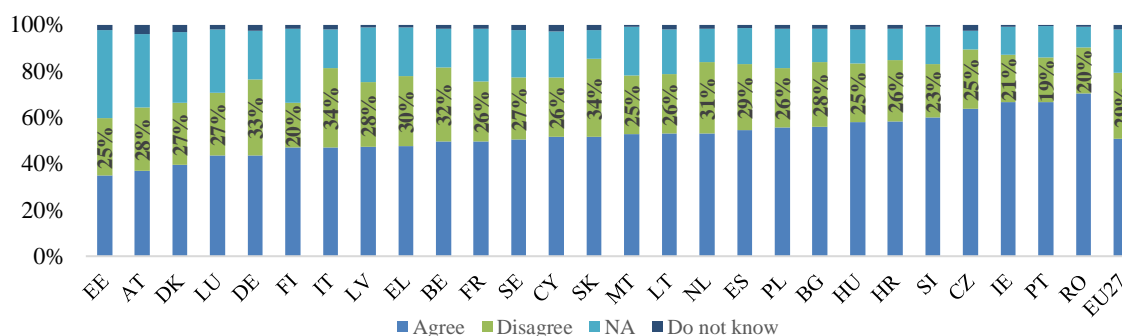
### 2.3.3.3 Remote and hybrid traineeships

A third issue relating to access are hybrid and remote traineeships. As the digital transformation advances, traineeships taken up remotely – including across borders – are likely to become more common. The COVID-19 pandemic accelerated the adoption of remote and hybrid forms of working, and highlighted the importance of anticipating adaptable learning and working arrangements.

In principle, remote and hybrid traineeships could create new opportunities by reducing the cost of providing traineeships and facilitating the provision of traineeships across borders or for individuals living in remote areas. However, several enabling factors need to be in place. The EC (2023a) evaluation of the 2014 QFT identifies a number of risks factors associated with remote or hybrid traineeships. First, remote traineeships may have negative impacts on learning content. The limited chances for trainees to actively participate and communicate with their peers, mentors, and colleagues may adversely affect their educational achievements, and remote learning may not be well-suited to accommodating the individual learning styles of all trainees. This point was also substantiated by interviews conducted for this study, where trade unions, employer organisation and youth organisations all emphasized the risk of remote traineeships limiting skills development during the traineeship. Relatedly, access to adequate equipment to carry out a traineeship remotely is of significant importance. Second, the EC (2023a) evaluation identifies mental health risks associated with remote traineeships. The lack of socialisation associated with remote work has a detrimental impact on motivation and engagement and that the trend towards adopting flexible working arrangements may result in trainees experiencing a sense of obligation to remain connected and available outside working hours.

To evaluate some of the consequences of the digital transformation on traineeships, the Eurobarometer 2023 included two specific questions regarding the quality of hybrid/remote traineeships. The first relates to the provision of all necessary equipment to carry out a traineeship remotely (see Figure 17). Across the EU27, 29% of respondents stated that they did not receive all necessary equipment to carry out their tasks remotely. While there is some variation in this share across MS, it is at least 19% in all countries. Around one fifth of respondents stated that it was not possible to carry out their traineeship remotely. The highest levels of dissatisfaction are found in SK (34%), IT (34%), DE (33%), BE(32%) and NL (31%).

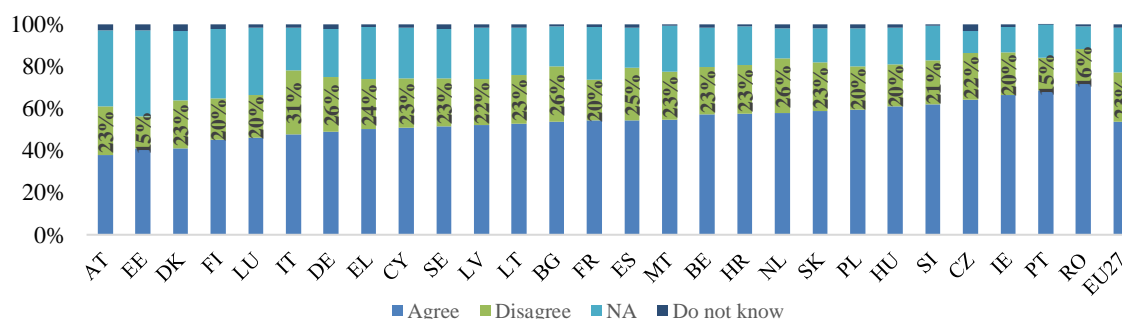
Figure 17: Access to necessary equipment to carry tasks remotely



Note: Own elaboration on Eurobarometer 2023, based on questions Q17\_1, and Q17\_2. Totally/tend to agree replies are merged, as are totally/tend to disagree. MS are ordered on the share agreeing. NA stands for traineeship that could not take place remotely.

Second, the survey enquired into whether individuals received adequate guidance and mentoring to carry out their tasks remotely (Figure 18). Here, at EU level, 23% of respondents responded that they did not receive adequate guidance. The highest shares of respondents who reported a lack of guidance were found in IT (31%), DE (26%), BG (26%), NL (26%) and ES (25%). Combining the evidence from the QFT evaluation, the interviews and the Eurobarometer, it thus seems apparent that there are persisting issues related to the quality of remote and hybrid traineeships in the EU, which reduces access to these traineeships and diminishes their potential positive effects on inequality in access to traineeships.

Figure 18: Adequate guidance/mentoring to carry tasks remotely



Note: Own elaboration on Eurobarometer 2023. Based questions Q17\_1, and Q17\_2. Totally/tend to agree replies are merged, as are totally/tend to disagree. MS are ordered on the share agreeing. NA stands for traineeships that could not take place remotely.

## 2.4 Consequences of the identified problems

The consequences of the above problems are diverse. Thus, the study distinguishes between consequences for trainees, for traineeship providers/employers, and for society at large.

### 2.4.1 Consequences for trainees

**C1: Precarious working conditions and standards of living during (and after) the traineeship:** As shown in P1 and P2 (Sections 2.3.1 and 2.3.2), there is still a large number of trainees who do not receive remuneration or any type of financial compensation, do not have access to social protection, and/or are exposed to sub-

standard working conditions. Precarious working conditions can affect the trainee's (and potentially their families') standards of living not only through inadequate pay, but also qualitatively<sup>103</sup>, undermining the trainee's self-esteem and mental health, future productivity and normalising precarious working conditions in the future. Calls for remuneration have for long been at the centre of the debates surrounding traineeships, with unpaid or low-paid traineeships attracting interest from media and public opinion (e.g. the European Committee of Social Rights' ruling on Belgium)<sup>104</sup>. Different actors, including youth organisations and the European Parliament, have argued that unpaid or low-paid traineeships constitute an exploitative practice<sup>105</sup>. Moreover, trade unions and youth organisations interviewed for this study highlighted that issues of precarious working conditions and their consequences disproportionately affect individuals from vulnerable groups (P3, Section 2.3.3). Precarious working conditions risk exacerbating inequality in access to traineeships, as the ability to take up a traineeship will be dependent on individuals financing themselves throughout the traineeship, thus limiting access for people from a disadvantaged socio-economic background.

**C2: Reduced opportunities for career development/employability:** Poor quality traineeships - in the form of poor learning content and working conditions (P1 and P2, Sections 2.3.1 and 2.3.2) - can impact trainees' professional skills development, employability and consequently, future career. This also increases the size of the opportunity cost, including the indirect consequence of deadweight loss if the trainee would have obtained employment even without the traineeship. Risks may be higher for those from vulnerable or disadvantaged backgrounds, who may be more 'liquidity constrained' and need to accept the first job available, even if it is not a good or suitable opportunity (P3, Section 2.3.3)<sup>106</sup>. According to the 2023 Eurobarometer, at the EU level, 31% of trainees found that their experience was not or will not be helpful in finding a regular job (Annex 1.2, Figure 27), slightly more than in 2013 (28%)<sup>107</sup>. According to the 2023 data, in 10 MS (DE, DK, ES, IT, LT, LU, AT, PL, SI, SK) the proportion of respondents who believe that their experience was not conducive to finding regular employment surpasses that of the EU average, ranging from 39% to 32%. Looking into the various categories of traineeships at the EU27 level, a greater proportion of respondents express negative evaluations of OMT, with 39% reporting dissatisfaction. This is followed by ALMP, where 33% of respondents express negative views. ECT ranks third (32% of respondents) and MPT (27% of respondents).

Importantly, evidence clearly links the quality of traineeships with labour market integration. Several studies suggest that paid (remunerated) traineeships are associated with better labour market outcomes compared to unpaid ones (EC 2023a)<sup>108</sup>. This is likely linked to the fact that, as also shown in P2 (Section 2.3.2), paid traineeships are associated with better programme structure, namely mentoring (c.f. learning content), and sufficient duration, which in turn increase the chances of successfully securing a post-placement position as a regular employee<sup>109</sup>. Furthermore, access to social protection is associated with better labour market outcomes for trainees<sup>110</sup>. The link between pay and better labour market outcomes is further supported by data from the Eurobarometer,

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103 See, for example, Rosin, A. (2016), "Precariousness of Trainees Working in the Framework of a Traineeship Agreement", *International Journal of Comparative Labour Law and Industrial Relations*, 32(2), p. 131-159.

104 No. 150/2017 European Youth Forum (YFJ) v. Belgium, available [here](#).

105 See i.e. European Parliament resolution of 17 February 2022 on empowering European youth: post-pandemic employment and social recovery (2021/2952(RSP)); European Youth Forum (2023). *The Costs of Unpaid Internships*.

106 Chetty, R. (2008) "Moral Hazard versus Liquidity and Optimal Unemployment Insurance," *Journal of Political Economy*, 116 (2), pp. 173-234.

107 Eurobarometer 2013, p. 63.

108 See also Stewart, A., Owens, R. J., Hewitt, A., & Nikoloudakis, I. (2018). *The regulation of internships a comparative study*. International Labour Organization: [https://www.ilo.org/publication/wcms\\_635740.pdf](https://www.ilo.org/publication/wcms_635740.pdf).

109 Higgins and Pinedo Caro (2023) What makes for a 'good' internship? in: ILO (2021) *Internships, Employability and the Search for Decent Work Experience*.

110 See i.e. Chapter 3 of ILO (2021) *Internships, Employability and the Search for Decent Work Experience*; Hunt and Scott (2020) *Paid and Unpaid Graduate Internships: Prevalence, Quality and Motivations at Six Months after Graduation*.

which shows that 39% of unpaid trainees found that their traineeship was not useful in finding a job, while this was only the case for 25% of paid trainees. The usefulness of unpaid traineeships for finding a job is particularly low in IT, LT, PL, SI and SK, where less than 50% of respondents found the traineeship useful in finding a job (Annex 1.2, Figure 28).

Furthermore, evidence from both the interviews with EU-level stakeholders and the literature, including empirical studies, points to the training content being central to whether trainees perceive their experience as helping them find regular employment<sup>111</sup>. Ensuring proper learning content of traineeships improves trainees' prospects and facilitates their transition to the labour market, thus helping to fulfil the fundamental rationale of traineeships<sup>112</sup>. Conversely, poor-quality traineeships with low learning content do not lead to significant productivity gains and do not entail positive signalling effects<sup>113</sup>. In the Eurobarometer 2023 data, there is a significant positive correlation between perceptions of learning content and helpfulness in finding a regular job at EU level<sup>114</sup>. This clearly supports the point made above.

The EC (2023a) evaluation further identifies having a supervisor or a mentor (the former being recommended in the 2014 QFT) as a critical element of quality, contributing to better post-placement outcomes. Empirical evidence supports this finding, as having a mentor is associated with better learning and labour market outcomes<sup>115</sup>. In addition, the vast majority of respondents in the survey conducted for Ecorys (2023) support study indicated that guidance and/or support from a supervisor are extremely helpful in finding a job (76%). The results of the Eurobarometer 2023 support this assessment, as there is also a strong and statistically significant correlation between being able to turn to a mentor and perceptions of learning<sup>116</sup>.

**C3: Legal uncertainty and inability to challenge unjust/unfair practices.** To the extent that the trainee's contractual and socio-economic capacity is limited, their ability to appeal to the relevant authorities in settling disputes with the employer is as well (D1, Section 2.5.2). This is particularly true where trainees have inadequate social protection, or where they are excluded from the scope of CBA and other forms of social protection (P2 and D2, Sections 2.3.2 and 2.5.3). Regulatory complexity and divergence between different MS exacerbates this issue (D1, 2.5.2). Where specific rules apply differently across MS, this especially impacts cross-border traineeships.

## 2.4.2 Consequences for traineeship providers and employers

**C4: Burdensome process for employers to offer quality traineeship opportunities, particularly for SMEs.** The regulatory systems governing traineeships and/or the legal status of trainees in the EU are complex and fragmented. There is significant cross-country regulatory variance, with both the OECD and ILO showing variation across EU MS, in terms of traineeships' duration, qualifications, requirements, and social partners'

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111 Higgins and Pinedo Caro (2021), What makes for a 'good' internship? in: ILO (2021) Internships, Employability and the Search for Decent Work Experience; Comyn and Brewer (2018) Does work-based learning facilitate transitions to decent work?

112 See EC (2013). Impact Assessment Accompanying the Proposal for a Council Recommendation on a Quality Framework for Traineeship, SWD (2013) 495 final.

113 Stewart (2021) The nature and prevalence of internships in: ILO (2021) Internships, Employability and the Search for Decent Work Experience. See also: Cerulli-Harms, A. (2017) "Generation Internship: The Impact of Internships on Early Labour Market Performance", Institute of Labour Economics, Discussion Paper Series No. 11163.

114 Correlation coefficient 0.86.

115 O'Higgins and Pinedo Caro (2023) What makes for a 'good' internship? in: ILO (2021) Internships, Employability and the Search for Decent Work Experience.

116 Correlation coefficient of 0.83.

involvement<sup>117</sup>. The legal analysis conducted for this study also provides ample evidence of regulatory divergence with regard to various aspects of traineeships across MS (D1, D2, Sections 2.5.2 and 2.5.3). Furthermore, there are examples of within-country divergence, as in Germany, where jurisdiction for traineeships and apprenticeships is shared between the 16 federal states and the National Ministry for Employment, leading to a fragmented training landscape that is difficult for employers - especially SMEs - to navigate<sup>118</sup>. Interviews with relevant EU stakeholders reveal that a complex regulatory landscape can be a problem for all businesses, but especially SMEs, who often lack the administrative capacity required to ensure QFT-compliant traineeships, and prefer not to burden one of their (few) employees with the additional work of being a mentor. Moreover, a business may not have the time or resources to research a complex and ambiguous regulatory legal framework in order to provide a traineeship. Cousins (2018) links this aspect with a simple lack of knowledge of the appropriate legislation, causing employers to spend yet more time familiarising themselves with the complex regulation for providing quality traineeships<sup>119</sup>.

**C5: Reduced pool to recruit; skills and competences not matching company needs.** Unequal access to traineeships and low numbers of cross-border traineeships (P3, Section 2.3.3) reduce the size of the talent pool employers can recruit from. This has negative effects on the match between a hired trainee's skills and company needs, and ultimately, the level of actual productivity compared to potential. Frequently, it may lead to the 'wrong' trainee being hired for the traineeship, as Maertz et al. (2014) note, with misaligned expectations between trainee and employer leading to ineffective traineeships<sup>120</sup>. As such, the reduced pool of trainees associated with unequal access to traineeships limits the extent to which trainees' skills match company needs, which is detrimental for both the company and trainee. Moreover, the issue of skills mismatch may be further exacerbated by poor-quality traineeships with low learning content (P2, Section 2.3.2). A study of UK SMEs and graduates suggests that SMEs - and other employers - may have little experience with young workers, and thus may be ill-equipped to best put them to use (Brindley, 2000)<sup>121</sup>. This implies that the traineeship will hold little benefit for skills development, and that trainees will not be able to acquire skills needed for the traineeship and their subsequent labour market career. This is disadvantageous for employers, as the pool of skilled trainees - and therefore future workers - is reduced, as is the degree to which the skills trainees develop during their traineeship matches future labour market needs.

**C6: "Uneven playing field" between providers with/out quality traineeships.** Companies offering quality traineeships face higher costs compared to those that do not do it, as to do so implies better remuneration, social protection and learning content - and hence costs (P2, Section 2.3.2). When such companies are in competition with peers who resort to problematic traineeships (P1, Section 2.3.1), the latter gain a competitive advantage in terms of lower labour costs. Such distortions impact the domestic level playing field and potentially also across MS. Thus, companies that provide quality traineeships are disadvantaged compared to competitors that are effectively exploiting their trainees.

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117 OECD (2014), Background Paper for the G20-OECD-EC Conference on Quality Apprenticeships for Giving Youth a Better Start in the Labour Market. ILO (2013), "Towards a Model Apprenticeship Framework: A Comparative Analysis of National Apprenticeship Systems", International Labour Organisation and the World Bank, New Delhi.

118 OECD (2017), Engaging Employers in Apprenticeship Opportunities: Making It Happen Locally.

119 Cousins, B. (2018). Design thinking: Organisational learning in VUCA environments, *Academy of Strategic Management Journal*, 17 (2), 1-18.

120 Maertz Jr, C., Stoeberl, P., & Marks, J. (2014). Building successful internships: lessons from the research for interns, schools, and employers. *Career Development International*, 19 (1), 123-142.

121 Brindley, C. R. (2000). Undergraduates and small and medium-sized enterprises: Opportunities for a symbiotic partnership? *Education & Training* 2000, 8 (9), 509-517.

### 2.4.3 Consequences for society at large

**C7: Reduced productivity and loss of competitiveness.** Krugman (1994) famously remarked that “[a] country’s ability to improve its standard of living over time depends almost entirely on its ability to raise its output per worker...in the long run productivity is nearly everything”<sup>122</sup>. Just as high-quality training content improves trainee productivity and human capital development, poor learning content provided to trainees (P2, Section 2.3.2) does not<sup>123</sup>. This is an issue reflected in almost all interviews with EU-level stakeholders, who all note the productivity-enhancing potential of traineeships for trainees and, in the long run, for the labour market as a whole, but also the numerous obstacles to doing so. If poor quality traineeships proliferate *en masse*, the consequence is stagnating productivity, economic competitiveness, and, to some degree, general standards of living (EC, 2023a). A traineeship characterised by subpar learning content effectively squanders the trainee’s time, and, empirical evidence suggests that it can lead to scarring effects that depress wages and productivity even after the traineeship is over<sup>124</sup>. Low-quality traineeships can even have ‘locking-in’ effects (Van Ours, 2004), whereby trainees decrease their search efforts during the traineeship and hence, become less likely to find a new employer that would be a better match, thus further lowering their productivity<sup>125</sup>. Moreover, a lack of productivity gains may be felt by the traineeship provider too, if the trainee fails to be well-aligned with company needs or skill gaps<sup>126</sup>. This represents an opportunity cost for the employer and employee. At the wider level, an abundance of low-quality traineeships thus contributes to a workforce that is less productive and lacks the necessary skills to meet societal needs, particularly in a changing labour market context (see External Drivers, Section 2.5.1).

**C8: Unemployment.** Problematic traineeships and low-quality traineeships (P1, P2 in Sections 2.3.1 and 2.3.2) fail to sufficiently develop the trainee’s employability and thus lead to sub-optimal labour market outcomes (see evidence under C2, Section 2.4.1). A trainee who experienced a low-quality traineeship is less likely to find a new job as compared to peers on higher-quality traineeships. Cerulli-Harms (2017), in a study investigating earning outcomes for German graduate trainees, finds that they are even less likely to find employment a year later than those who do not undertake a traineeship<sup>127</sup>. This is often exacerbated by traineeships reducing job-search intensity, as a trainee’s time is filled with their traineeship, further reducing employment rate if the traineeship is not of good quality<sup>128</sup>. At societal level, low-quality traineeships are therefore likely to lead to increased unemployment rates.

## 2.5 What are the problem drivers?

This section dissects the problems into their drivers. It first described the external drivers. It then discusses the three internal drivers and their sub-items (see the problem tree, Figure 7).

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122 Krugman, P. (1994) *The Age of Diminished Expectations*, 3rd ed. Massachusetts: MIT Press.

123 Mincer, J. (1962). On-the-job training: Costs, returns, and some implications, *The Journal of Political Economy*, 70 (5), 50–79; Barron, JM. Dan AB. and Mark AL. (1989). Job matching and on-the-job training, *Journal of Labor Economics*, 7 (1), 1–19.

124 Cockx, B. and Matteo P. (2013). Scarring effects of remaining unemployed for long term unemployed school-leavers, *Journal of the Royal Statistical Society: Series A (Statistics in Society)*, 176 (4), 951–980.

125 van Ours, JC (2004). The locking-in effect of subsidized jobs, *Journal of Comparative Economics*, 32(1), 37-55.

126 Stewart (2021). The nature and prevalence of internships in: ILO (2021) *Internships, Employability and the Search for Decent Work Experience*.

127 Cerulli-Harms, A. (2017). *Generation Internship: The Impact of Internships on Early Labour Market Performance*. Institute of Labour Economics, Discussion Paper Series No. 11163.

128 García-Pérez, JI. and Muñoz-Bullón, F. (2011). Transitions into Permanent Employment in Spain: An Empirical Analysis for Young Workers. *British Journal of Industrial Relations*, 49 (1), 103–143.

## 2.5.1 External drivers

The problems outlined above are indirectly influenced by megatrends, such as globalisation, digitalisation and ongoing societal transformations, which affect labour markets. These drivers, while also impacting developments in traineeships, are 'external' to the scope and reach of the initiative that this study aims to support.

**The twin green and digital transformations** have the potential to increase productivity and living standards but may leave behind current and future workers. Increased automation, digitisation, and robotisation have significantly contributed to job polarisation, but new, greener economies and industries could also benefit lower-skilled workers<sup>129</sup>. Globally, the ILO predicts that some 71 million jobs will be lost and around 79 million created by 2030 due to the green transition. In the EU, some 2.5 million net jobs will be created by 2030. These transformations are also reshaping the workforce by creating new occupations, modifying existing roles, and emphasising the importance of new skills. Up- and re-skilling have become critical, increasing the need and demand for training (and hence traineeships) among both young and mid-career professionals. Traineeships can, potentially, be an important measure to bring about the twin transition, by advancing skills development and facilitating job transitions for individuals affected. However, this will only be possible if traineeships are of high quality and have a strong learning component. As such, the green and digital transformation may influence the quality and substance of traineeships, particularly their learning content.

**The shrinking EU working age population** is a trend that is particularly stark for young workers aged 15-29, whose share of the total population has declined from 18.1% in 2011 to 16.3% in 2021<sup>130</sup>. This demographic trend is further tightening already tense labour market conditions, through a (relative) decline in the supply of labour, especially of young workers. Employers therefore increasingly have to compete to attract young talented employees. This is expected to lead to improvements in traineeship conditions and quality.

In periods of **economic downturn or recession**, youth unemployment increases faster than total unemployment (see Figure 19), as young employees who tend to have short-term contracts are often the first to be dismissed<sup>131</sup>. As described in detail below in D1, trainees typically have lower negotiating power compared to other labour market participants (due to the over-supply of trainees and competition for limited opportunities, especially in some sectors), while pressure on companies to minimise costs is higher during times of economic difficulty. This increases the potential for offering low or unpaid work without significant educational value, thus potentially resulting in lower quality of traineeships or problematic traineeships (Figure 1).

**The rise of remote and hybrid working arrangements**, spurred by digitalisation and the COVID-19 pandemic, has disrupted organisational structures and reduced social interaction and face-to-face communication<sup>132</sup>. Some studies have even found that this may lead to a deterioration of the effectiveness of knowledge transfer and learning at the workplace<sup>133</sup>. Since learning is a key element of the quality of traineeships, potential

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129 ILO, (2019), Skills for a greener future: a global view, international labour office, Geneva [https://www.ilo.org/wcms\\_732214.pdf](https://www.ilo.org/wcms_732214.pdf).

130 EC (2023b). The impact of demographic change – in a changing environment, Commission SWD(2023) 21 final, available [here](https://ec.europa.eu/economic_finance_affairs/dbpedia/property/has_source/EC2023b).

131 O'Higgins, N. (2001). Youth unemployment and employment policy: A global perspective. Geneva, ILO. <https://ssrn.com/3019316>.

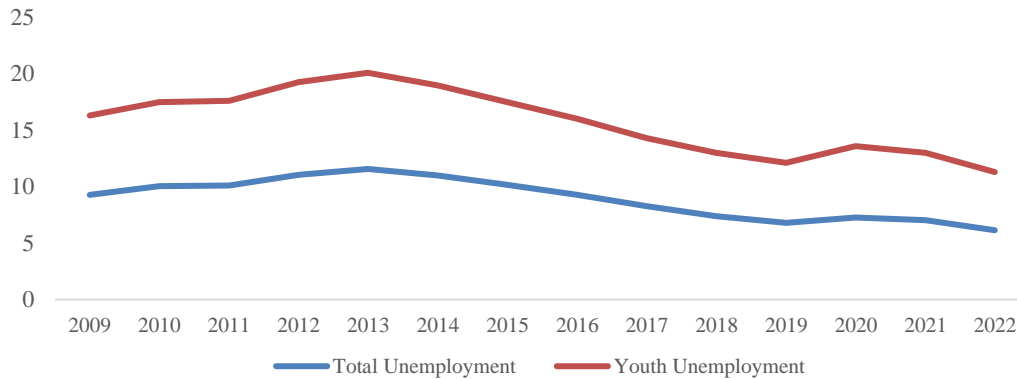
132 Eurofound (2023), Hybrid work in Europe: Concept and practice, Publications Office of the European Union, Luxembourg, p.11. <https://eurofound.link/ef22011>.

133 Glaeser, E. L. (2008). Cities, agglomeration, and spatial equilibrium. OUP Oxford.; Roca, J. D. L., & Puga, D. (2017). Learning by working in big cities. *The Review of Economic Studies*, 84(1), 106-142. Both articles have extensively investigated the size advantage of big cities to provide workers with better opportunities to accumulate valuable experience.



effects of remote and hybrid working arrangements and workplace interactions are relevant for young people and trainees.

Figure 19: EU youth unemployment (15-29) and total unemployment rates (%)



Source: Eurostat

**‘Job-hopping’**, the practice of changing jobs frequently and typically within a short period, has become more relevant in recent years. Recent OECD research<sup>134</sup> has illustrated an increase in job-to-job transitions in OECD countries for all age groups over the period 2012-2019. However, mature workers are less prone to change jobs compared to younger workers, likely reflecting older workers’ preferences for fewer job changes as they have settled into a good ‘match’ with their employer and have more stable life circumstances. It could also reflect reservations on the part of employers for hiring older workers. A 2022 survey in nine European countries<sup>135</sup> revealed that one in three workers was considering quitting in the following three to six months. A growing stream of evidence suggests that young workers (mostly millennials and gen Z-ers) are forgoing the traditional career ladder, and instead jump from role to role. The job-hopping approach has been supported by evidence of faster pay rises and acceleration in career progression. However, high turnover comprises a negative human capital externality, where the company is less likely to receive the full benefit of having trained its employees and recoup its (training) investment. On aggregate, particularly when the employee has in-demand skills, this can lead to the under-provision of training (learning opportunities), and a socially inefficient market outcome, as employers are disincentivised from investing in training<sup>136</sup>. Consequently, the provision of high-quality traineeships becomes less likely, as employers have reduced incentives to provide training for workers.

**Lower brand recognition and visibility of small companies** can drive their ability to recruit trainees compared to well-established, larger companies, and thus drive inequality in access to traineeships. Small companies may struggle to attract the attention of talented young individuals who are more familiar with or drawn to prominent brands. In addition, large companies are increasingly using trainee programmes to identify and nurture potential future employees (sometimes called talent pipeline)<sup>137</sup>. By recruiting trainees, they can assess their skills, potential, and cultural fit within the organisation, and ultimately offer trainees full-time positions upon completion of the programme. With a view

In this literature, increasing returns to scale on human capital are driven by the positive knowledge spillovers that originate from personal interaction between workers.

134 OECD (2023), *Retaining Talent at All Ages*, Ageing and Employment Policies, OECD Publishing, Paris.

135 Eight EU MS (BE, DE, ES, FR, IT, AT, PL, PT) and Switzerland. The figure cited is based on a sub-set of ~11 000 respondents. Survey done by McKinsey, see related article [here](#).

136 This constitutes an example of a hold-up problem leading to under-provision of training. See Acemoglu, D., & Pischke, J. S. (1998). *Why do firms train? Theory and evidence*. *The Quarterly journal of economics*, 113(1), 79-119.

137 There is increasing anecdotal evidence of such practices in multinational companies. See for instance <https://engage.symba.io/internships-to-build-strong-talent-pipeline>.

of becoming more appealing to aspiring professionals seeking to launch their careers, such companies often offer well-structured and reputable trainee programmes, which in turn affect their brand. This is likely to affect the perception of growth opportunities of future trainees, who may believe that joining a larger organisation can provide them with a broader range of advancement prospects and exposure to diverse projects. By contrast, very small companies may be seen as offering limited career growth opportunities.

Finally, **language barriers** constitute a barrier to take-up of cross-border traineeships. According to data from the Eurobarometer 2023, 17% of respondents indicated that they did not do a traineeship abroad due to insufficient knowledge of a foreign language. However, this tends to be quite concentrated in a few countries (in CZ, PL, SK, ES and FR the percentage of respondents is above 20%) while in other countries it is less of an issue (in Cyprus, DK, EE, EL, LU, MT and NL it is lower than 10%).

## 2.5.2 D1. Internal drivers related to legal and enforcement issues, duration

Internal drivers are the main underlying causes of the problems that are within the scope of the initiative, i.e. the ones that it intends to address. The following sections will describe internal drivers related to legal and enforcement issues, as well as duration of traineeships.

### D1.1. Challenges arising from complexity in national regulatory approaches regarding the legal status of trainees and traineeships

As documented in Section 2.2.3, trainees are defined in different ways and have heterogeneous legal statuses under different national legal frameworks. In national law, Employee status typically implies the highest protection for trainees (at least in relative terms), including, but not limited to, aspects such as pay and access to social protection. Furthermore, trainees who have an employment contract or employment relationship as defined by the law, CBA or practice in force in every MS with consideration to the case law of the Court of Justice of the European Union, are subject to the EU labour law *acquis*. The EU labour law *acquis* sets out minimum standards on working and employment conditions, and information and consultation of workers, which help prevent the emergence of precarious work conditions<sup>138</sup>. The absence of legal status of worker has been identified as an enabling condition for problematic use of traineeships as it creates legal uncertainty about the applicable rules<sup>139</sup>.

Broadly speaking, the variety of rules, and the fact that relevant dimensions may be defined and regulated in many ways increases the complexity of the relevant framework applying to a traineeship and raises uncertainty about the relevant regime. In this situation, TP may have some room for manoeuvring and define more favourable agreements and conditions, or they may not even know how to comply with the legal requirements ('unintended' problematic use of traineeship). By contrast, trainees may not be aware of the benefits they are entitled to, nor of the tools available to them to raise complaints (see D1.3. below on the weak position of the trainee). While the existence of those situations is difficult to document, the lack of clear legal definitions is often

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138 Eleveld, A., Bazzani, T., De Le Cour, A., & Staszewska, E. (2022). Implementation of the European Youth Guarantee and the Right to Work: A comparative Analysis of Traineeship Programmes under the EU Active labour Market Policy. *International Journal of Comparative Labour Law and Industrial Relations*, 38(3), 269-297.; Rosin, A. (2017). *Labour Law Protection of Trainees*. Turku: University of Turku. Ik, 197., available [here](#).

139 See Eurofound (2017) *Fraudulent contracting of work: Abusing traineeship status (Austria, Finland, Spain and UK)*, Eurofound, Dublin.

associated with non-compliance and misuse of contracts<sup>140</sup>. Ultimately this can lead to problematic traineeships.

## D1.2. Insufficient enforcement and lack of capacity for controls and inspections

**Weak enforcement is likely to contribute to poor-quality traineeships** and, given the relevance of the QFT in fostering the labour market integration of young people, **ultimately cause divergence in the labour market opportunities offered to trainees across MS**. Moreover, **this driver is one of the fundamental underlying mechanisms that enables the existence of problematic traineeships in the first place**. As noted in the presentation of P1 (Section 2.3.1 and Box 1 in particular), the issue of traineeship misused (defined as disguised employment relationships, Section 2.1.2) can be taken up in labour courts. With trainees being in a weak position (see D1.3. below), controls and checks by labour inspectorates and/or PES would be critical in preventing and eliminating such practices.

The weak application of the quality principles linked to traineeships has been clearly noted by the EC (2023a) evaluation of the QFT, which highlighted **the insufficient implementation and enforcement of QFT principles on the ground, (even) if covered by national legislation**. According to the EC (2023a) evaluation, there has been a slight improvement in terms of implementation on the ground over the years, but a substantial difference exists between OMT and ALMP traineeships, with the latter generally found to be more aligned with the QFT principles. However, the scope of this driver – and to a large extent, also the analysis of the EC (2023a) evaluation – goes beyond the QFT and relates to general issues linked to the enforcement of the national legal frameworks governing traineeships.

There are several factors underlying the insufficient enforcement and implementation of the QFT and national legal frameworks. The factors highlighted in this section include (i) lack of enforcement capacity and mechanisms (ii) lack of awareness of QFT principles (iii) lack of monitoring.

The first issue underlying weak enforcement of QFT principles and national measures is a **lack of enforcement capacity and mechanisms**. Starting with the former, the main issue identified by the study supporting the QFT evaluation (Ecorys, 2023) in relation to enforcement stems from capacity problems. Monitoring appears to be restricted by the limited resources of labour inspectorates. In 2017, the average number of employed people per labour inspector was close to 16 000, which is considerably above the 10 000 target set by the International Labour Organization (ILO)<sup>141</sup>. Moreover, the ILO data also points to a decline in the number of inspectors and inspections over time. For instance, between 2017 and 2022, in BE, the number of inspectors declined by almost 10%, from 313 to 291; and the number of inspections by about 20%, from 62 487 to 30 384. A decline in the number of inspections is reported across most EU MS (notably, DE, ES, FR and PL). In addition, considerable cross-country variation in the resources available exists across MS. The above figure on the number of employed people per labour inspector ranges from 36 000 in IE to 6 100 in BE<sup>142</sup>. Similarly, trade unions interviewed for this study highlighted that labour inspectorates often lack resources - in terms of personnel, but also finances - to satisfactorily carry out inspections. This is particularly worrying in

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140 See for instance Williams, C., Llobera, M., & Horodnic, V. A. (2020). Tackling undeclared work in the collaborative economy and bogus self-employment. [https://www.ela.europa.eu/Report\\_collaborative\\_economy\\_BSE.pdf](https://www.ela.europa.eu/Report_collaborative_economy_BSE.pdf).

141 EC (2018b). Proposal for a Regulation of the European Parliament and of the Council establishing a European Labour Authority. SWD(2018) 69 final.

142 Williams, C., & Puts, E. (2017). European Platform Undeclared Work 2017 Platform Survey Report: organisational characteristics of enforcement bodies, measures adopted to tackle undeclared work, and the use of databases and digital tools. European Commission, Brussels.

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

light of the 2016 Eurofound study<sup>143</sup> investigating fraudulent work contracts, which explicitly notes that 'costs and difficulties in detecting fraudulent use' are one of the main enabling factors for the 'fraudulent' use of traineeships.

Next to enforcement capacity, however, there are also problems linked to the existence and quality of enforcement mechanisms. The EC (2023a) evaluation argues that such mechanisms exist in all 27 MS for ALMP traineeships but only in half (14 MS) for OMT. Moreover, there are considerable differences in the function of these mechanisms across MS. 24% of public authorities filling in the survey conducted for this study indicated that in their countries, there is no enforcement mechanism to ensure that quality principles are implemented. More precisely, there are eight MS (BG, EE, HR, CY, IT, LU, RO, FI) where at least one public authority representative indicated that no enforcement mechanisms exist to ensure the quality of traineeships in their country. In four of these, this could also be due to a lack of awareness, as other respondents from the same country indicated otherwise (BG, EE, IT, LU). However, the lack of awareness by public authority employees could also be interpreted as signalling potential issues as regards the use and/or effectiveness of enforcement mechanisms. 26% of respondents (from BE, BG, CZ, EE, IT, LT, MT, NL, AT, SK) noted that mechanisms are based on inspections, while 18% (from BE, DK, IT, LU, NL, SK) indicated complaints received as the basis. 32% of respondents reported that they used 'other' enforcement mechanisms.

In addition, the legal analysis conducted for this study provides data on the existence of procedures for registering complaints and reporting malpractice in each MS (Table 1). Only four countries<sup>144</sup> (IE, LT, LU and SK) have procedures for registering complaints and reporting malpractice for all four types of traineeships. In seven MS, no procedures were identified for any type of traineeship (CZ, DE, HR, CY, AT, PL, SI). There is also heterogeneity between traineeships as only certain types are covered in some MS (for instance ALMP, ECT and MPT are covered in DK, IT and LV, only ALMP in PT and only legal MPT in RO).

**Table 1: Procedures for registering complaints and reporting malpractice**

	Yes - there is a procedure/system	No - there are no such procedures	Completeness
OMT	BG, IE, ES, LV, LT, LU, SK [7 MS]	CZ, DK, DE, EE, EL, HR, IT, CY, LV, MT, HU, NL, AT, PL, PT, RO, SI [16 MS]	1 NA (FR.), 3 no data (BE, FI, SE)
ALMP	BG, DK, EE, IE, IT, LV, LT, LU, PT, SK, [11 MS]	CZ, DE, EL, ES, HR, CY, NL, AT, PL, RO [10 MS]	2 NA (HU, SI), 4 no data (BE, FR, MT, FI, SE)
ECT	BG, DK, IE, LV, LT, LU, IT, HU, SK [9 MS]	CZ, DE, EE, ES, CY, NL, AT, PL, PT, RO, SI [11 MS]	1 NA (HR), 6 no data (BE, EL, FR, MT, FI, SE)
MPT	DK, EE (medical, legal), IE, IT (medical), LV, LT, LU, HU, NL (legal), RO (legal), SK [11 MS]	BG (medical, legal), CZ, DE, EL, ES, HR, CY, AT, PL, PT, SI [11 MS]	5 no data (BE, FR, MT, FI, SE)

Note: Own analysis. NA indicate cases where such traineeship types are not known (FR for OMT, HU for ALMP). For ALMP, in SI there are no formal traineeship contracts and therefore this is treated as NA. For ECT, HR is marked as NA as these traineeships are conducted on a free market basis.

In addition, Table 2 provides information on the existence of systems for inspections or guidance for labour inspectorates with specific reference to traineeships. Enforcement and systems for inspection are lacking across a number of MS and types of traineeships. In most countries, no such systems could be identified for any of the four traineeship types. Only four MS set out systems of inspections or guidance for all traineeships (BG, LT, LU, SK). Overall, specific inspections to check trainees' situation are likely to be limited in

<sup>143</sup> Eurofound (2016) Exploring the fraudulent contracting of work in the European Union, Eurofound, Dublin.

<sup>144</sup> In the tables, LV is also noted as covering all four types as channels for reporting are open to all trainees. Nonetheless, while formally possible, OMT are not regulated in the country, therefore it was not included in this list.

number. The widespread lack of systems in place emerging from the data above add to the problem of inadequate capacity of the labour inspectorates, documented in the EC (2023a) evaluation.

Moreover, according to Ecorys (2023) study supporting the evaluation, even in cases where mechanisms exist, these mechanisms are not adequately used, thus lowering the degree to which legislation in place is implemented in practice. CZ, ES, IT and CY are reported as cases of weak enforcement in the case of ALMP. The EC (2023a) evaluation also argued that these issues could be even more important in countries in which the status of trainees is governed by regulations that differ from general labour law, as such a situation calls for more systematic monitoring that labour inspectorates can hardly provide (see also D2.1.1. in Section 2.5.3).

**Table 2: Existence of systems of inspections or guidance for inspectorates**

	Yes	No	Completeness
OMT	BG, EL, LT, LU, HU, SK [6 MS]	CZ, DK, DE, EE, IE, ES, HR, IT, CY, LV, MT, NL, AT, PL, PT, RO, SI [17 MS]	1 NA (FR), 3 no data (BE, FI, SE)
ALMP	BG, DK, IE, IT, LT, LU, PT, SK [8 MS]	DE, CZ, EE, EL, ES, HR, CY, LV, NL, AT, PL, RO [12 MS]	2 NA (HU, SI), 5 no data (BE, FR, MT, FI, SE)
ECT	BG, DK, IE, EL, IT, LT, LU, HU, SK [9 MS]	CZ, DE, EE, ES, CY, LV, NL, AT, PL, PT, RO, SI [12 MS]	1 NA (HR), 5 no data (BE, FR, MT, FI, SE)
MPT	BG, DK (medical), IE, IT (medical), LT, LU, HU, SK [8 MS]	CZ, DE, EE, EL, ES, CY, HR, LV, NL, AT, PL, PT, RO, SI, [14 MS]	5 no data (BE, FR, MT, FI, SE)

Note: Own analysis. NA indicate cases where such traineeship types are not known (FR for OMT, HU for ALMP). For ALMP, in SI there are no formal traineeship contracts and therefore this is treated as NA. For ECT, HR is marked as NA as these traineeships are conducted on a free market basis.

### D1.3. Weak position of trainees

There are several reasons that could explain why trainees face an asymmetrical power dynamic in relation to traineeship providers. An important first consideration is how this driver is intrinsically linked to the legal status of the trainee. Trainees not classified as employees are exposed to precarious work conditions because they only benefit from limited labour rights (if at all). A written traineeship agreement does not always provide sufficient protection to the trainee<sup>145</sup>. Moreover, besides the problems related to weak enforcement and capacity, labour inspectorates and trade unions might lack legal competences in cases where trainees are not officially classified as workers<sup>146</sup>.

The complexity of agreements between the traineeship provider and the trainee can be another cause for an asymmetric power dynamic between the employer and the trainee. Trainees are sometimes simply unaware of their rights due to a lack of legal training, limited experience in dealing with contracts and the complexity of agreements presented to them<sup>147</sup>. In this respect, the fact that some types of traineeships involve tripartite arrangements (e.g. ALMP, ECT), implies an interaction between a formal and a substantive employer, which further complicates the position of trainees<sup>148</sup>. Furthermore, trainees are often not in a position to influence the conditions of their traineeship<sup>149</sup>. The position of ‘dependency’ in which trainees might find themselves- be it real or perceived -

<sup>145</sup> Rosin, A. (2016), “Precariousness of Trainees Working in the Framework of a Traineeship Agreement”, International Journal of Comparative Labour Law and Industrial Relations, 32(2), p. 131-159.

<sup>146</sup> Eurofound (2017) Fraudulent contracting of work: Abusing traineeship status (Austria, Finland, Spain and UK), Eurofound, Dublin.

<sup>147</sup> Ibid.

<sup>148</sup> Rosin, A. (2016), “Precariousness of Trainees Working in the Framework of a Traineeship Agreement”, International Journal of Comparative Labour Law and Industrial Relations, 32(2), p. 131-159.

<sup>149</sup> Ibid.

is yet another factor putting them in a relatively weaker position. Rosin (2016)<sup>150</sup> argues that ‘Even if direct economic dependency is weak, social dependency on the employer in obtaining education or entering the labour market is stronger. Additionally, the receipt of only job-specific training can increase the trainee’s dependency’.

Given the relatively short duration of traineeships and the limited resources available to trainees, real or perceived dependency, as well as potential unawareness of their rights, trainees are unlikely to go to courts to enforce their rights due to their weak position. There are initiatives by trade unions in support of trainees to further consider their interests. However, their capacity to improve the rights of trainees is hindered by low youth membership rates and limited presence at the company level<sup>151</sup>.

Finally, the relative bargaining power of trainees also depends on the characteristics and labour market dynamics specific to different sectors<sup>152</sup>. The EC (2023a) evaluation of the 2014 QFT has pointed to a few sectors where low-quality traineeships were more prevalent, and where trainees’ bargaining power is likely to be low(er). These sectors included arts, entertainment and recreation, health and social work and education. Neither the evaluation nor other studies present conclusive evidence as to why such differences exist. The reasons could be manifold, including for instance more ‘thick’ labour markets<sup>153</sup> in these sectors, as a large supply of trainees compared to the labour demand implies that TP can pick from a larger pool of candidates and are less exposed to reputational issues.

#### D1.4. Long duration of traineeships, including consecutive traineeships (with the same employer), share of trainees in a company and employers requiring previous experience

As noted in the Section 2.3.1 presenting P1, there are several potential indicators of problematic traineeships, among which: i) the excessive duration of traineeships and the related issue of consecutive traineeships (with the same employer, Section 2.3.1.2), ii) a high share of trainees relative to employees in a company (Section 2.3.1.5), and iii) employers requiring trainees to have previous experience (Section 2.3.1.3). This section discusses the national legal framework and practices in relation to these indicators and as potential drivers of problematic use of traineeships<sup>154</sup>.

Turning first to the duration of traineeships, according to Ecorys (2023) study supporting the QFT evaluation<sup>155</sup>, the length of traineeships, which in ‘principle’ should not exceed six months unless duly justified, is one of the principles that is least implemented in MS legislative frameworks.

The legal analysis conducted for this study (Table 3) indicates that legal obligations mandating that the duration of OMT be a maximum of six months exist only in five MS (BE, LT, LU, PL, RO), while in two others (BG, CZ) this depends on the type of traineeship undertaken (i.e. alignment with the principle is partial). For instance, in BG, for some of the OMT<sup>156</sup>, the Labour Code indicates that traineeships cannot be less than 6 months and not more than 12 months. In another seven MS (IE, ES, HU, PT, SI, FI, SE) legal

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150 Ibid.

151 Eurofound (2017) Fraudulent contracting of work: Abusing traineeship status (Austria, Finland, Spain and UK), Eurofound, Dublin.

152 See also Section 2.3.1.1 for a discussion on problematic traineeship in some sectors.

153 The term ‘thick’ (or slack) is used to describe labour markets with a high number of unemployed (or candidates) for the number of available positions (vacancies). The term describes the opposite situation to ‘tight’ labour market, in which the number of candidates is low for the number of vacancies.

154 Table 36 to Table 39 in Annex 1.8 provide a mapping of legal provisions on duration of traineeships and consecutive traineeships in each MS by type of traineeship.

155 See page 26 of Ecorys (2023).

156 Contracts regulated by Art. 233B LC. Conversely, those under Art 230 LC can last up until 6 months, hence its ‘partial’ classification.

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

restrictions exist indicating other duration restrictions<sup>157</sup>. 12 MS (DK, DE, EE, EL, HR, IT, CY, LV, MT, NL, AT, SK) have no provisions on the duration of OMT. In some cases, traineeships exceeding six months are explicitly included in legislation. For ALMP traineeships, a legal restriction exists in six MS (BE, CZ, EE, EL, FR, RO) defining a maximum duration of traineeships of six months, with a further eight (BG, DK, IT, LT, LU, MT, PL, SK) having such restrictions for certain contract types. In four MS, other legal temporal restrictions apply (ES, HR, PT, SE). In seven MS (DE, IE, CY, LV, NL, AT, FI) this legal obligation does not exist.

Regarding ECT, two MS (LT, LU) have legal instruments setting a maximum duration of six months with a further three (BG, IT, LT) mandating it for some contract types. There are no restrictions in 17 MS (BE, CZ, DK, DE, EE, IE, EL, ES, CY, MT, NL, PL, PT, SI, SK, FI, SE). Additionally, in three MS (LV, AT, RO) such legal obligations exist with diverging maximum limits. In line with expectations, MPT are generally not restricted to six months in the EU<sup>158</sup>.

Comparing the above requirements with data from the Eurobarometer provides mixed evidence of the effectiveness of these measures. Regarding OMT, four out of the five countries (BE being the exception) requiring traineeships to be shorter than six months rank below the EU average<sup>159</sup> in terms of paid traineeships longer than this benchmark, and all are below when looking at both paid and unpaid traineeships (though Belgium only barely so<sup>160</sup>). However, the evidence is weak regarding ALMP traineeships, where six countries requiring these traineeships to be lower than six months rank above the EU average share of traineeships longer than six months<sup>161</sup> (BE, CZ, DK, IE, RO, SE), albeit when looking at paid ALMP trainees<sup>162</sup> this is only true for three (DK, IE, SE). It should be noted that a severe limitation of this comparison is that Eurobarometer data refers to the last traineeship of the respondent, which could have taken place before specific legal requirements entered into force in a MS.

**Table 3: Legal requirements on the maximum duration of traineeships**

	Maximum six months	Depends on contract (can be max six months or not)	There is a requirement but longer than six months	No requirement	Data availability and remarks
OMT	BE, LT, LU, PL, RO [5 MS]	BG, CZ [2 MS]	IE, ES, PT, SI, FI, SE [6 MS]	DK, DE, EE, EL, HR, IT, CY, LV, MT, NL, AT, SK [12 MS]	1 NA (FR), 1 unclear but has legal requirements in place (HU)
ALMP	BE, CZ, EE, EL, FR, RO [6 MS]	BG, DK, IT, LT, LU, MT, PL, SK [8 MS]	ES, HR, PT, SE [4MS]	DE, IE, CY, LV, NL, AT, FI [7 MS]	2 NA (HU, SI)
ECT	LU, HU [2 MS]	BG, IT, LT [3 MS]	LV, AT, RO [3 MS]	BE, CZ, DK, DE, EE, IE, EL, ES, CY, MT, NL, PL, PT, SI, SK, FI, SE [17 MS]	1 NA (HR), 1 no data (FR)

<sup>157</sup> The results of the evaluation (EC, 2023a) showed that 10 MS were at least partially in compliance (BE, CZ, HR, HU, LT, LU, NL, PL, RO, SE) and 7 were not compliant (BG, DK, DE, IE, ES, AT, PT).

<sup>158</sup> Only IT and SI require that traineeships be less than six months.

<sup>159</sup> 16.8%.

<sup>160</sup> 12.9% vs BE 12,86%.

<sup>161</sup> 10.5%.

<sup>162</sup> EU average is 13%.

## STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MPT	-	IT, SI [2 MS]	BE, BG, EE (medical), ES, LT, LU, HU, NL, AT, PL (medical), PT, RO, SK (legal), FI (legal), SE [15 MS]	CZ, DK, DE, EL, CY, LV, MT [7 MS]	3 no data (IE, FR, HR)
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Note: Own analysis. NA indicate cases where such traineeship types are not known (FR for OMT, HU for ALMP). For ALMP, in SI there are no formal traineeship contracts and therefore this is treated as NA. For ECT, HR is marked as NA as these traineeships are conducted on a free market basis.

In relation to the second duration indicator of problematic traineeships, i.e. consecutive traineeships with the same employer, Table 4 provides an overview of legal restrictions on this matter by type of traineeships and MS. The table takes a narrow understanding of such restrictions, as it does not take into consideration limitations on duration, tackled just above.

Once again, comparing such restrictions with Eurobarometer 2023 data (see analysis under P1 in Section 2.3.1) reveals that the existence of restrictions is by no means a thorough indication of what is happening on the ground. All of the six countries with restrictions on consecutive OMT had more than 10% respondents reporting traineeships with the same employer, with five MS even above the EU average (~26%), namely LT, HU, RO, SK, FI. For ALMP, two out of the five countries with restrictions were above the EU average of 35% (PT, SK). Once again, this information should be treated with caution as Eurobarometer respondents could have completed their traineeships before the introduction of measures on consecutive traineeships.

**Table 4: Restrictions on Consecutive Traineeships**

	Yes	No	Completeness
OMT	LT, HU, RO, SK, FI, SE [6 MS]	BG, CZ, DE, DK, EE, IE, EL, ES, HR, IT, CY, LV, MT, NL, AT, PL, PT, SI, SK [19 MS]	1 NA (FR.), 1 no data (BE)
ALMP	LU, PL, PT, SK, SE [5 MS]	BG, CZ, DE, DK, EE, IE, ES, HR, IT, CY, LT, MT, NL, AT, RO, FI [16 MS]	2 NA (HU, SI), 4 no data (BE, EL, FR, LV)
ECT	LT, HU, SI [3 MS]	BG, CZ, DE, DK, EE, IE, EL, ES, IT, CY, LV, LU, MT, NL, PL, PT, RO, SK, FI, SE [20 MS]	1 NA (HR), 3 no data (BE, FR, AT)
MPT	DE, DK (legal) ES (legal) <sup>163</sup> , LU, SI, SK (legal) [6 MS]	BG, CZ, EE, IE, IT, CY, LV, LT, HU, MT, NL, AT, PL, PT, RO, FI, SE [17 MS]	4 no data (BE, EL, FR, HR)

Note: Own analysis. NA indicate cases where such traineeship types are not known (FR for OMT, HU for ALMP). For ALMP, in SI there are no formal traineeship contracts and therefore this is treated as NA. For ECT, HR is marked as NA as these traineeships are conducted on a free market basis.

A further aspect linked to both the duration of traineeships and the issue of consecutive traineeships is whether the conditions for extending, renewing or terminating traineeships are clear and known to trainees. Ecorys (2023) study supporting the QFT evaluation notes that regarding the termination of traineeships, conditions are included in the written agreement in a large number of traineeships (citing BE, BG, LT, HU, PL, PT, RO, SI). However, the legal analysis conducted for this study reveals that there are several traineeship types where there is no clarity on the conditions in the written agreement (Table 5). In EE and ES, only medical MPT lay down clear conditions. In addition to these countries, clear conditions are not set out for OMT in DK, EE, IE, EL, ES, HR, IT, LV and

<sup>163</sup> Interpretation of whether this is to be considered as restriction on consecutive traineeships or duration is not straightforward, as restriction refers to completion of 30 ECTS.



**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

PT, for ALMP traineeships in EE, EL, ES, MT, NL, SK and for ECT in CZ, EE, ES, PL, PT, SI and SK.

**Table 5: Clarity in traineeship's conditions for termination, extension or renewal**

	Yes	No	Completeness
OMT	BE, BG, CZ, DE, ES, CY, LT, LU, HU, NL, AT, PL, PT, RO, SI [15 MS]	DK, EE, IE, EL, ES, HR, IT, LV, MT [9 MS]	1 NA (FR), 2 no data (SK, SE)
ALMP	BE, BG, CZ, DK, DE, IE, FR, HR, IT, CY, LV, LT, LU, AT, PL, PT, RO, FI, SE [19 MS]	EE, EL, ES, MT, NL, SK [6 MS]	2 NA (HU, SI)
ECT	BG, DK, DE, IE, IT, CY, LT, LU, LV, HU, AT, RO [12 MS]	CZ, EE, ES, PL, PT, SI, SK [7 MS]	1 NA (HR), 7 no data (BE, EL, FR, MT, NL, FI, SE)
MPT	BG, CZ, DE, DK, EE (medical), IE, ES (medical), IT (medical), CY, LV, LT, LU, HU, PT, RO, SI, SK, AT, PL [19 MS]	EL	7 no data (BE, FR, HR, MT, NL, FI, SE)

Note: Own analysis. NA indicate cases where such traineeship types are not known (FR for OMT, HU for ALMP). For ALMP, in SI there are no formal traineeship contracts and therefore this is treated as NA. For ECT, HR is marked as NA as these traineeships are conducted on a free market basis.

A high share of trainees relative to employees within a company is another potential indicator of problematic traineeships identified in this study. Table 6 provides an overview on the existence of upper limits on the share of trainees in a company across MS and by type of traineeships. It is apparent that such caps exist only for a small number of MS and often solely for certain types of traineeships. In six countries (DK, DE, EE, ES, CY, NL), caps on the shares of trainees in a company do not exist at all. Caps on the share of trainees exist in eight countries (BG, HU, LT, LU, AT, PL, PT, RO) for OMT, the highest number across the different types of traineeships. For MPT, there are a number of cases where limits exist only for certain sectors (PL, PT, RO, SK). LT is the only country where caps exist for all types of traineeships.

**Table 6: Existence of a cap on the share of trainees in a company**

	Yes	No	Completeness
OMT	BG, LT, LU, HU, AT, PL, PT, RO [8 MS]	CZ, DE, DK, EE, IE, EL, ES, HR, IT, CY, LV, MT, NL, SI, SK [15 MS]	1 NA (FR), 3 no data (BE, SE, FI)
ALMP	EL, IT, LV, PL, PT, [5 MS]	BG, CZ, DE, DK, EE, IE, ES, HR, CY, LT, LU, NL, AT, RO, SK [15 MS]	2 NA (HU, SI), 5 no data (BE, FR, MT, FI, SE)
ECT	LT, LU, HU, SK [4 MS]	BG, CZ, DE, DK, EE, IE, ES, IT, CY, LV, NL, AT, PL, PT, RO, SI [16 MS]	1 NA (HR), 6 no data (BE, EL, FR, MT, FI, SE)
MPT	CZ, IE, IT, LT, PL (medical), PT (law), RO (medical), SI, SK (law) [9 MS]	BG, DE, DK, EE, ES, CY, LV, LU, HU, NL, AT [11 MS]	7 no data (HR, EL, BE, SE, FR, MT, FI)

Note: Own analysis. NA indicate cases where such traineeship types are not known (FR for OMT, HU for ALMP). For ALMP, in SI there are no formal traineeship contracts and therefore this is treated as NA. For ECT, HR is marked as NA as these traineeships are conducted on a free market basis.

Finally, a last indication of potential problematic traineeships relevant to this section regards trainees performing the same tasks as regular employees. One driver of trainees performing the same tasks as employees is employers requiring applicants to have previous experience. To gauge the prevalence of experience requirements in

traineeships, this study conducted an analysis of traineeship vacancies<sup>164</sup> listed on the EURES platform. Based on a sample of 1,180 traineeship vacancies from four countries (BE, DE, NL, FI), the analysis reveals that about 20% of them stipulate the necessity of prior experience for applicants. However, upon closer examination, not all these cases are necessarily indicative of problematic traineeships. Several vacancies appear to be misclassified as traineeships or do not genuinely mandate prior experience. Nonetheless, a subset of cases highlights instances where employers do indeed demand experience for what are designated as regular traineeships.

Overall, the arguments developed above show that there are clear gaps in legal restrictions that can potentially act as drivers to problematic use of traineeships across MS and types of traineeships. In a majority of MS, the absence of provisions on limiting traineeship duration below six months, as recommended in the QFT, appears to spur long duration traineeships. Equally, the lack of restrictions on consecutive traineeships with the same employer drives the existence of repeated traineeships. Both of these factors are further compounded by the lack of clarity on conditions for termination, extension or renewal of traineeship contracts, which leaves trainees in a weaker position when negotiating contracts. The absence of a company cap on the share of trainees in most MS, is an additional factor enabling the substitution of regular employment with traineeships. Finally, the fact that some employers require trainees to have previous experience constitutes an indication that trainees are often expected to perform the same tasks as employees.

### **2.5.3 D2. Internal drivers related to inadequate working conditions and poor learning content of traineeships**

This section examines factors driving inadequate working conditions, focusing on the issues of remuneration, differentiated treatment, access to social protection, and learning content. Trainees benefiting from an ‘employee’ status under national law are also under the protection of the EU labour law acquis. They are better placed to enforce their rights (justiciability), and in principle benefit from better working conditions. This section focuses on trainees with worker status, hence falling under the EU labour law acquis, and to the extent possible, it examines differences in the situations of trainees who have the worker status and those who do not (See Section 2.2.3 for a discussion on the legal status of trainees).

#### **D2.1. Issues related to working conditions for trainees, including equal treatment, fair remuneration and access to social protection**

##### **D2.1.1. Remuneration and differentiated treatment**

Problems linked to working conditions, including remuneration, are largely<sup>165</sup> due to the underlying (lack of or unclear) legal obligations governing traineeships. The data collected through the legal analysis allows for exploring whether there is a legal obligation to provide some sort of remuneration (i.e. the data shows whether unpaid traineeships are legally possible) to trainees across the different types of traineeships. Table 7 shows the results.

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<sup>164</sup> A detailed description of the methodology employed and the results of the analysis can be found in Annex 3.

<sup>165</sup> But not only; the labour cost, job-hopping and trainee demand and supply considerations in the external drivers (Section 2.5.1) are also relevant.

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

**Table 7: Existence of general obligation for trainees' remuneration/compensation**

	Legal requirement for remuneration and level	Comments on remuneration	Legal requirement for full social protection	Legal requirement for partial social protection	Comments on social security protection
OMT	At least MW: BG*, SI [2 MS] At least MW if conditions are met (e.g. duration, employee status): CZ, DE, EE, IE, EL, HR, CY, LT, LV, HU, MT, NL [12 MS] Requirement but lower than MW or comparable worker: RO [1 MS] Requirement but lower than MW or comparable worker if conditions are met (e.g. duration, employee status): BE, ES, LU, PT [4 MS] Requirement but unclear due to data limitation: FI, SE		BE, BG, DK, DE, IE, EL, ES, HR, CY, LT, LU, HU, NL, AT, PL, PT, RO, SI, FI, SE [20 MS]	CZ, EE, SK [3 MS]	For countries with variable legal status (see table above) only employee contracts are presented here. Otherwise access to social security is unlikely or only partial.
ALMP	At least MW: BE, BG, HR, LV, MT [5 MS] Other requirement: BE, CZ, DK, DE, ES, IE, ES, FR, HR, IT, CY, LT, LU, PL, PT, SE [16 MS] Unemployment benefit: EE, AT, FI [3 MS]	Case by case: EL, NL, SK [3 MS]	BE, BG, DK, EE, IE, EL, LV, LU, MT, PT, AT, RO, FI, SE [14 MS]	CZ, DE, ES, FR, HR, IT, LT, PL [8 MS]	Contribution and access can be subject to traineeship type
ECT	Remuneration provided requirements on length are met and lower than MW: FR, LU, HU, SK [4 MS] Depending on status and/or contract type –CZ, DE, EE, IE, EL, ES, HR, CY, LT, NL, AT, FI [10 MS]	In the case of status-dependent requirement, generally MW: (CZ, DE, EE, CY, LT, NL), share of MW (EL, HR) or collective agreements apply (AT, FI)	BG, DK, IE, EL, LT, LV, LU, NL, HU, AT, FI [11 MS]	BE, DE, EE, ES, IT, PT, RO, SI [8 MS]	For countries with variable legal status (see table above) only employee contracts are presented here.
MPT medical	BE, CZ, DK, DE, EE, IE, EL, ES, FR, HR, IT, CY, LV, LT, LU, HU, MT, NL, AT, PL, PT, RO, SI, SK, SE [25 MS]	Not sufficient data on remuneration level.  In the case of IT, only specialisation phase is remunerated	CZ, EE, IE, EL, ES, FR, HR, CY, LT, LV, LU, HU, MT, NL, AT, PL, RO, SI, SK, FI, SE [21 MS]	BE, DK, DE, IT [4 MS]	
MPT legal	BE, CZ, DK, DE, EE, IE, HR, IT, CY, LT, LU, HU, NL, AT, PL, PT, RO, SI, SK, FI, SE [21 MS]	Not sufficient data on remuneration level.  PT was included here although currently there is no requirement, however, recent legislative changes adopted will require it in the future	CZ, EL, ES, HR, CY, HU, NL, AT, SK, FI, SE [11 MS]	BE, DK, DE, EE, IT, LT, PL, RO, SI [9 MS]	

Note: Own analysis. NA indicate cases where such traineeship types are not known (FR for OMT, HU for ALMP). For ALMP, in SI there are no formal traineeship contracts and therefore this is treated as NA. For ECT, HR is marked as NA as these traineeships are conducted on a free market basis.

Regarding OMT, there are 22 MS (all but BG, SI, RO and FR where OMT is banned) where unpaid traineeships are legally possible, at least under some contract types or most

often through 'voluntary' traineeship schemes. Equal treatment of trainees is not guaranteed even in cases when a contractual employment relationship exists. Where trainees are in an employment relationship or other conditions are met (e.g. sufficient duration), in 12 MS (CZ, DE, EE, IE, EL, HR, CY, LT, LV, HU, MT, NL)<sup>166</sup> they are entitled to at least the minimum wage. In ES and SI, additional provisions exist providing for proportionate remuneration. In ES, the remuneration of trainees should be at least 60%-75% (depending on duration) of the remuneration of a comparable worker as established in the respective CBA. In SI the law states that the trainee has the right to at least 70% of the remuneration of a comparable worker. Other MS set the minimum level of remuneration to a proportion of the minimum wage. For example, in BE and RO this level is set to 50% of the MW, in LU at 40%-75% of the minimum wage (for unskilled trainees depending on duration) and in PT at least 80% of the minimum wage. In PL, trainees can be paid or unpaid, but their remuneration cannot exceed 200% of the minimum wage. In AT special regulatory provisions exist for traineeships with the state, which have their own pay scale.

The majority of ALMP trainees receive some kind of remuneration, compensation or social benefit. The only situations where this is not necessarily the case arise in EL, NL and SK where these are case-dependent. Overall, the situation across MS exhibits considerable variation. For instance, in BE, BG<sup>167</sup>, HR, LV and MT, ALMP trainees are entitled to at least the minimum wage. In LT, the ALMP trainees receive 50% of the minimum wage, while in PL they receive a training allowance equal to 120% of the unemployment benefit. In SE, the level of remuneration is obligatory and has to follow the relevant CBA. The trainees receive remuneration which varies and depends on each scheme. In IT, ALMP traineeships offer (at least) a monthly salary of EUR 500.

In the case of ECT, the large majority of MS allow for unpaid traineeships, with only four MS (FR, LU, HU, SK) having mandatory provisions on remuneration or compensation. Such remuneration/compensation is most often tied to the traineeship lasting for at least a minimum duration: in FR, this is two months, in LU four weeks, while in HU it is six weeks. In LU, compensation is optional if the traineeship lasts less than four weeks; for longer traineeships, compensation corresponds to at least 30% of the minimum social wage for unskilled workers. In HU, an exception relates to traineeships undertaken in public administration, which might still be unpaid. In PT, students doing secondary vocational courses are entitled to a grant, as well as compensation for meals, travel and accommodation expenses, and for childcare (when necessary for the student to attend the course). In higher education, such expenses are not covered. In SK, students in secondary education are entitled to compensation of at least 50% of the hourly minimum wage, considering the quality of the work and the pupil's behaviour. The law also states that the employer may also cover expenses for meals, travel and accommodation. In the remaining MS there are no legal obligations for remuneration. It is important to note that because an ECT trainee is still in university, they often benefit from other sources of support, for instance, scholarships or financial support through Erasmus+.

Mapping two professions where MPT are undertaken, legal and medical professions, it seems that the majority of MS have legal obligations for remuneration or compensation. This is the case for 21 MS in the case of legal trainees (BE, CZ, DE, DK, EE, IE, HR, IT, CY, LT, LU, HU, NL, AT, PL, PT<sup>168</sup>, RO, SI, SK, FI, SE) and for 25 in the case of medical trainees (BE, CZ, DE, DK, EE, IE, EL, ES, FR, HR, IT, CY, LV, LT, LU, HU, MT, NL, AT, PL, PT, RO, SI, SK, SE).

Comparing legislation regarding trainee remuneration/compensation with Eurobarometer data on remuneration offers further insight into the association between the two, as well

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<sup>166</sup> Though in DE and CY this is tied to a certain minimum duration. In BG, the level of pay also depends on the contract: it is possible that only 90% of the minimum wage is guaranteed.

<sup>167</sup> Similarly to OMT, the level of pay depends on the contract type and can also be 90% of the minimum wage.

<sup>168</sup> Currently no requirement, however recent legislative changes adopted will require it in the future.

as the degree of compliance. There is evidence of an association between the obligation to remunerate trainees and there being a smaller share of unpaid trainees within MS. The three MS that do not allow unpaid OMT traineeships (BG, RO, SI) all score below the EU average in share of unpaid OMT. For ALMP and MPT, traineeships where the share of MS requiring mandatory remuneration and/or compensation is very high, the average share of unpaid trainees (38% and 35%, respectively) is lower than for OMT (42%) and ECT (52%). However, the fact that even under such regulated circumstances the share of unpaid traineeships is reported to be high (above 10% in all MS) points to enforcement issues<sup>169</sup>. The situation for ECT is less clear-cut, with HU and SK being below the average EU share of unpaid trainees, but FR and LU above. This, however, can also be partially explained by the obligations being tied to a certain minimum duration, which Eurobarometer respondents might not have fulfilled while completing their traineeships.

### D2.1.2. Access to social protection

Ecorys (2023) study supporting the evaluation of the QFT noted that the diverse regulatory approach to traineeships, alongside the variety of definitions for “trainee” and “traineeship” at MS level, result in uncertain access to social protection for trainees. The impact assessment for the Recommendation on access to social protection for workers and the self-employed<sup>170</sup> found that in certain EU MS, particular groups of non-standard workers - among which trainees - are not officially granted access to specific or all branches of the social security system and therefore are in a disadvantaged position compared to regular (standard) employees. The impact assessment listed 10 countries in particular where one or several branches of social security are not granted to trainees<sup>171</sup>.

The EP resolution of June 2023 on quality traineeships<sup>172</sup> further points the lack of social security coverage as an important source of concerns for trainees. Along this line, trade unions, youth and civil organisations at EU and national levels, as well as trainees themselves<sup>173</sup> consider access to social protection essential and an area where the lacks of an explicit recommendation in the QFT reduces the relevance of the framework.

The legal analysis conducted for this study allows for an overview of access to social protection by different branches. Table 8 shows this information by traineeship type. As noted above, social security systems are typically centred on employees. It can therefore be assumed that trainees who also qualify as employees are covered by the majority of social security branches, whilst those who are not employees may benefit from some insurance (typically against work accidents) but not from all social security branches (e.g. pension rights, unemployment insurance). Overall, results indicate that trainees do have access to different branches of social protection, but the conditions vary considerably across MS and type of traineeships<sup>174</sup>.

In general, trainees have access to two social security branches, namely “Accidental & Occupational Injuries” (for all four types of traineeships) and sickness benefits. In most of the MS (BE, BG, DK, DE, IE, EL, ES, HR, CY, LT, LU, HU, NL, AT, PL, PT, RO, SI, FI, SE for OMT; BE, BG, DK, EE, IE, EL, LV, LU, MT, PT, AT, RO, FI, SE for ALMP; BG, DK, IE, EL, LT, LV, LU, NL, HU, AT, FI for ECT, CZ, EE, IE, EL, ES, FR, HR, CY, LT, LV, LU, HU, MT, NL, AT, PL, RO, SI, SK, FI, SE for medical MPT and CZ, EL, ES, HR, CY, HU, NL,

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169 Another potential issue could be related to interpretation of the question by respondents - see notes elsewhere on this.

170 EC (2018c). Impact Assessment Accompanying the document Proposal for a Council Recommendation on access to social protection for workers and the self-employed, SWD(2018) 70 final.

171 These are EL, IT, MT, NL, PL, RO, DK, FR, HU, LT. However, this data could be incorrect as the SWD was published in 2018.

172 2020/2005(INL), already referred to before.

173 Based on interviews performed with such organisations for this study, as well as the results of the stakeholder consultation of Ecorys (2023) study supporting the evaluation of the QFT, see Synopsis report (Annex V), p. 114 on social protection.

174 Including with regards to contribution, which can be financed by the trainee, the employer or the state.

AT, SK, FI, SE for legal MPT) the same protection is granted as to regular employees, provided that the trainee benefits from an employment contract.

**Table 8: Access to social protection by Member State and type of traineeship**

Branch	Traineeship type	Access (number of MS)	Share of 27 MS
Accidental & Occupational Injuries (A)	OMT	20	67%
	ALMP	23	74%
	ECT	16	56%
	MPT	19	85%
Sickness Benefit (S)	OMT	17	63%
	ALMP	22	81%
	ECT	15	59%
	MPT	19	78%
Unemployment Benefits (U)	OMT	15	52%
	ALMP	12	41%
	ECT	6	22%
	MPT	7	41%
Old-Age Benefits (P)	OMT	16	63%
	ALMP	15	52%
	ECT	9	37%
	MPT	14	70%
Maternity & Equivalent Paternity Benefits (M)	OMT	15	59%
	ALMP	17	59%
	ECT	12	41%
	MPT	17	70%

Source: Own elaboration.

## D2.2. Insufficient learning content of traineeships

### D2.2.1. Weak provision of learning component of traineeships: mentorship and supervision

Besides remuneration and access to social protection, learning content is an important dimension of traineeships' quality, with two of the 2014 QFT principles<sup>175</sup> related to this aspect (see also Section 2.3.2.4). As such, provisions for ensuring adequate learning content can be important drivers of traineeship quality. The implementation of the QFT principle "the tasks assigned to the trainee enable these [learning] objectives to be attained" in national legislation<sup>176</sup> is assessed for OMT and ALMP traineeships in Ecorys (2023) study supporting the QFT evaluation. It reports that – among the 19 MS where this was deemed relevant<sup>177</sup> - only 12 MS have implemented the principle for OMT. The MS that have not implemented the principle despite it being relevant to them are AT, CY, DK, HU, IE and PL. Moreover, in six additional countries (CZ, DE, EL, HR, PT and RO), the principle has only been partially implemented. For ALMP, this figure is much higher as the

175 Namely 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' and 5: 'Encourage traineeship providers to designate a supervisor for trainees guiding the trainee through the assigned tasks, monitoring and assessing his/her progress'. Note that while supervision is covered by the QFT's 5th principle, mentorship is not included.

176 'Tasks allow the trainee to work towards their learning and training objectives – see Tables 8 and 9 of Ecorys (2023) study supporting the evaluation of the QFT.

177 The EC (2023a) evaluation considers that in seven MS, OMT do not exist (EE, FR, FI, IT, MT, SE and SK). The understanding of this study is stricter and of the above considers EE, FI, SE and SK as relevant. For this specific principle, in line with our understanding, LV was deemed as NA, adding up to the tally of 8 MS.

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

principle has been implemented in 25 MS<sup>178</sup>. Overall, Ecorys (2023) study indicates that the principle on alignment of tasks with learning objectives is among the principles that are least implemented in national legal frameworks.

To supplement and extend this analysis to the other types of traineeships, the legal analysis that formed part of this study compiled data on legal provisions relating to the learning content of traineeships in EU MS for all types of traineeships (Table 9). The largest gaps in legal provisions to ensure that tasks allow for trainees to work towards their learning and training objectives are found in the case of OMT. In contrast, the other three types of traineeships tend to be more regulated, with provisions for MPT found in all but three MS (BG, EL, CY), and all but one MS for ALMP (CY). Regarding ECT, 15 countries (BG, DE, DK, IE, EL, ES, IT, LV, LT, LU, HU, AT, PT, RO, SK) have such provisions. The extent to which these provisions are translated into effective learning content seems to be, however, somewhat limited. According to Eurobarometer 2023 results, AT, which has provisions for all but OMT, ranks at the bottom among EU MS, with 28% of respondents reporting that they have not learnt useful professional content, though other factors are likely influencing this result.

In addition to the definition of tasks matching trainees' learning objectives, the provision of a mentor and/or supervisor is a key element of the learning component of traineeships (see also Section 2.3.2.4). In this regard, the QFT includes a principle on traineeship providers assigning a supervisor for the trainee. The EC (2023a) evaluation finds that in the case of OMT, 14 out of the 18 relevant MS have implemented this principle (with DE, IE AT, and PL not implementing it), while for ALMP traineeships, 24 MS implemented it (the exceptions being AT, BG and DE).

**Table 9: Legal provisions regarding written agreement and written information**

	Yes	No	Completeness
OMT	BE, BG, CZ, DE, EL, ES, HR, LT, LU, PT, RO, SI [12 MS]	DK, EE, IE, IT, CY, LV, MT, AT, HU, PL, SK [11 MS]	1 NA (FR), 3 no data (NL, FI, SE)
ALMP	BE, BG, CZ, DE, DK, EE, IE, EL, ES, FR, HR, IT, LV, LT, LU, MT, AT, PL, PT, RO, SK, FI, SE [23 MS]	CY [1 MS]	2 NA (HU, SI), 1 no data (NL)
ECT	BG, DE <sup>179</sup> , DK, IE, EL, ES, IT, LV, LT, LU, HU, PT, RO, AT, SK [15 MS]	CZ, EE, CY, PL, SI [5 MS]	1 NA (HR), 6 no data (BE, FR, MT, NL, FI, SE)
MPT	CZ, DE, DK, EE, IE, ES, HR, IT, LV, LT, LU, HU, AT, PL, PT, RO, SI, SK (medical) [18 MS]	BG, EL, CY [3 MS]	6 no data (BE, FR, MT, NL, FI, SE)

Note: Authors' elaboration based on own legal analysis and Ecorys (2023). NA indicate cases where such traineeship types are not known (FR for OMT, HU for ALMP). For ALMP, in SI there are no formal traineeship contracts and therefore this is treated as NA. For ECT, HR is marked as NA as these traineeships are conducted on a free market basis. Written information includes e.g. indication on the tasks allowing trainees to work towards their learning and training objectives.

Table 10 shows the results of an extended analysis on the provision of a supervisor and/or mentor by type of traineeships. There are nine countries where OMT are not required to be assigned either a supervisor or a mentor (AT, DE, EL, IE, IT, LV, MT, PL, SK)<sup>180</sup>. For MPT, there are also a number of countries (e.g. BE, EE, IT, LT, NL, PL) where only traineeships in the medical sector are covered by supervision provisions, and only

<sup>178</sup> Note that implementation is indicated as only partial in CY, CZ, EE, PL and RO.

<sup>179</sup> As long as they are mandatory. There are no requirements for optional ECT traineeships.

<sup>180</sup> The discrepancy with the EC (2023a) evaluation results stems from the fact that two countries (SK and EL) were not assessed by that study.

two (BG and EL) are not otherwise covered by mandatory requirements on mentoring. Comparing requirements with Eurobarometer 2023 data (see Figure 15) does not yield a clear picture of the extent to which such provisions influence trainees' ability to turn to a mentor. For instance, DK has provisions for all traineeship types and has the second-highest share of respondents reporting that they had no or limited access to a mentor during their traineeships. Conversely, CY which also has requirements for all traineeship types, ranks fourth highest, with as many as 25% noting that they had no such option. This discrepancy between the existence of provisions on requirements and the Eurobarometer 2023 results could be explained by insufficient enforcement, a driver discussed previously in Section 2.5.2 under D1.

From the information detailed above, it is apparent that weak provisions on the learning component of traineeships in national legislation are a significant driver of poor-quality traineeships, in particular, inadequate learning content of traineeships. With regard to provisions that allow for trainees to work towards their learning objectives, a number of gaps in national legislation across MS and traineeship types are observed.

**Table 10: Legal provisions on the provision of a supervisor and/or mentor**

	Yes	No	Completeness
OMT	BE, BG, CZ, DK, EE, ES, HR, CY, LT, LU, HU, NL, PT, RO, SI [15 MS]	AT, DE, EL, IE, IT, LV, MT, PL, SK [9 MS]	1 NA (FR), 2 no data (FI, SE)
ALMP	BE, CZ, DK, EE, IE, EL ES, FR, HR, IT, CY, LV, LT, LU, NL, MT, PL, PT, RO, SK, FI, SE [22 MS]	BG, DE, AT [3 MS]	2 NA (HU, SI)
ECT	BG, DK, IE, ES, IT, CY, LV, LT, LU, HU, AT, PT, RO, SI, SK [15 MS]	DE, EE, CZ, PL [4 MS]	1 NA (HR), 7 no data (BE, EL, FR, MT, NL, FI, SE)
MPT	BE (medical), CZ, DE, DK, EE (medical), IE, ES, HR, IT (medical), CY, LV, LT (medical), LU, HU, AT, NL (legal), PL (medical), PT, RO (medical, legal), SI, SK [21 MS]	BG, EL [2 MS]	4 no data (FR, MT, FI, SE)

Note: Authors' elaboration based on own legal analysis and Ecorys (2023). NA indicate cases where such traineeship types are not known (FR for OMT, HU for ALMP). For ALMP, in SI there are no formal traineeship contracts and therefore this is treated as NA. For ECT, HR is marked as NA as these traineeships are conducted on a free market basis.

### **D2.2.2. Lack of transparency in vacancy notices**

The Directive 2019/1152 of 20 June 2019 on transparent and predictable working conditions<sup>181</sup> establishes that trainees could fall within the scope of the Directive if they meet the criteria established by the Court of Justice for determining worker status. Vacancies are the first place where transparency of working conditions should materialise. The QFT encourages TP to be transparent in their vacancy notices about the terms and conditions of the traineeship. It explicitly refers to certain financial conditions, namely an allowance and/or compensation, as well as health and accident insurance. It also recommends transparency about recruitment policies. These serve to allow aspiring trainees to make a well-informed decision on applying to a traineeship, considering trade-offs between financial considerations and career prospects. Vacancy notices that are clear on the (working) conditions are key as they help to ensure that potential trainees are not drawn to poor quality traineeships (P2, Section 2.3.2) nor to cases of problematic traineeships (P1, Section 2.3.1), which do not improve their skills or likelihood of finding a job.

According to Ecorys (2023) study supporting the evaluation, the QFT principle on transparency requirements (i.e., including information in the vacancy notice), is among the least implemented principles in national legal frameworks both for OMT and ALMP

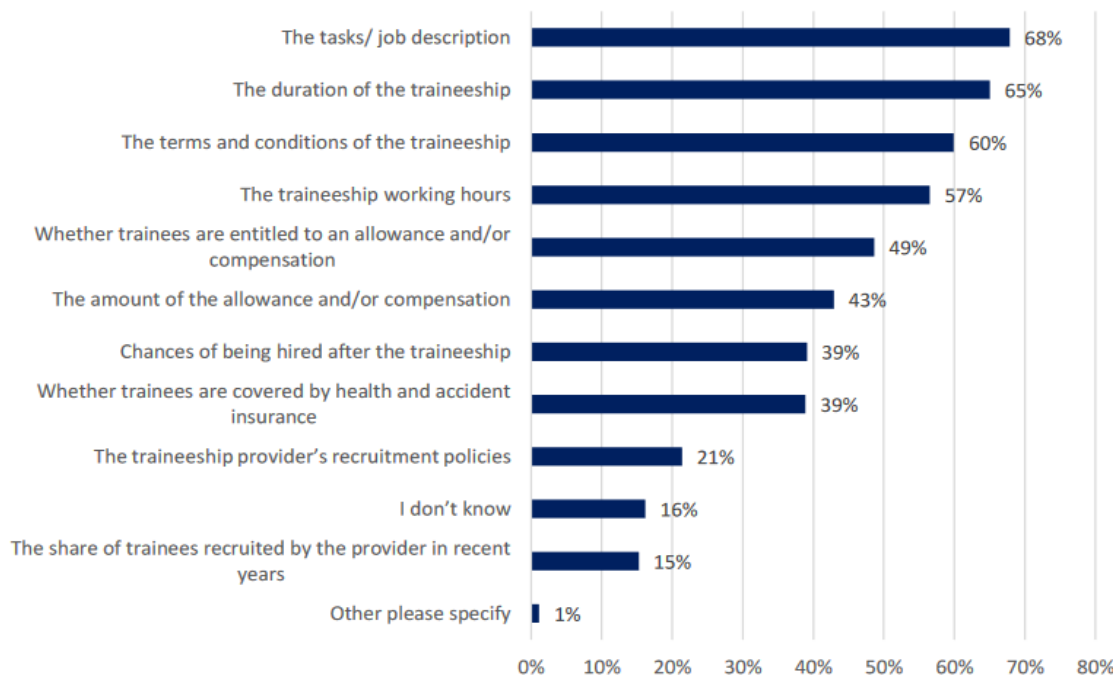
<sup>181</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32019L1152>.



traineeship regulations. In seven countries (BG, DE, DK, ES, HR, IE and PT) providers do not implement it, and three others (CY, EL, LT) only partially implement transparency criteria in vacancies under OMT, with the respective numbers being nine (DE, DK, ES, IE, IT, LV, SE, SI and SK) and seven (CY, EL, HU, LT, MT, PT and RO) in the case of ALMP (see Tables 8 and 9 in Ecorys, 2023).

Concerning the transparency of vacancies, an important point is what information trainees would like to see in vacancies, which determines the level of transparency that they perceive. According to the survey of trainees conducted for Ecorys (2023) study, when asked which elements they would like to find in a vacancy notice advertising a traineeship (Figure 20), respondents ranked the duration (56%) as the most important element followed by the terms and conditions (43%), and the task/job description (42%). Quite interestingly the existence and the amount of remuneration/allowance rank much lower.

**Figure 20: Information to be included in vacancy notice**



Source: Computed from 449 observations. Based on the question: "Which of the following elements would you like to find in a vacancy notice advertising the traineeship? (multiple choice allowed)". See page 19 of the Ecorys (2023) support study, Annex 8.

Overall, it seems that there is a gap between the limited compliance with transparency criteria of actual vacancies offered by TP and the aspiration of trainees to access a wide set of information on aspects that will determine, or at least affect, the working conditions during the traineeships.

### 2.5.4 D3. Internal drivers related to barriers to accessing traineeships for vulnerable groups and to quality of cross-border traineeships and remote/hybrid traineeships

#### D3.1. Barriers to access to traineeships, including cross-border traineeships

##### **D3.1.1. Barriers to access to traineeships for vulnerable groups**

As part of Ecorys (2023) study supporting the QFT evaluation, numerous stakeholders from youth organisations, trade union representatives and national authorities highlighted that the 2014 QFT implicitly considers trainees as a homogeneous group. However, there are multiple factors driving inequality in access to traineeships for individuals from disadvantaged groups. This simplification can limit the relevance of the 2014 QFT, which is currently unable to address the specific needs of young people belonging to vulnerable groups and as such, promote social cohesion and inclusion.

Data from the Eurobarometer 2023 allows for identifying the most prevalent barriers to taking up traineeships (Figure 21). The data shows that information-related issues are the most important barrier to access traineeships in all EU countries, although the scale of the issue differs. Access to information is likely particularly limited for individuals from vulnerable groups, who face a range of employment and non-employment related barriers in accessing the labour market<sup>182</sup> and thus, may struggle to find the necessary information to identify (quality) traineeship opportunities. Moreover, disadvantaged groups likely have lower access to information due to differences in the social environment. Like jobs, a number of traineeships are likely to be secured through personal connections and networking. There is growing evidence, mostly based on US data, underlining the importance of the personal network to fill open jobs. Many positions are never published publicly, but either posted internally or created for candidates that recruiters meet through networking. The importance of networks to access opportunities is likely to hold also for young candidate trainees, who are likely to inherit (directly or indirectly) unequal networks from parents. Individuals from disadvantaged backgrounds may have fewer connections in professional circles and limited access to informal mentors or role models, who can provide information on traineeship opportunities and the application process.

**Figure 21: Reasons not to have had a traineeship**



Source: Eurobarometer 2023, Report, p.18. Computed as a percentage of individuals who never had a traineeship.

Another barrier to accessing traineeships is lack of necessary skills. The Eurobarometer 2023 finds that on average, 8% of respondents had never undertaken a traineeship because they did not have the necessary skills<sup>183</sup>. The proportion of respondents who indicated that this constituted a barrier was lower among those with a post-secondary level of education (4%) compared to those with secondary education or lower (9%). This indicates that lower-educated individuals face particular difficulties in accessing traineeships as they are less likely to possess the required skillset. This seems consistent

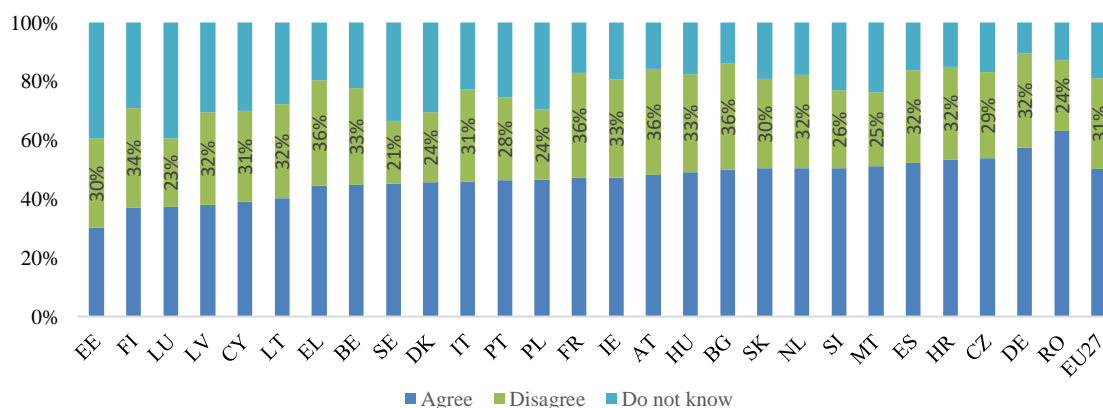
182 ILO (2018). Public employment services: Joined-up services for people facing labour market disadvantage. Geneva: International Labour Office.

183 Socio-economic disadvantages can also impact the quality of education received, resulting in unequal skills/qualifications. Some traineeships require specific educational backgrounds or qualifications, which may be harder for individuals from disadvantaged backgrounds to fulfil.

with the evidence provided in Section 2.2.4 that the vast majority of EU (paid) trainees have medium and higher levels of education.

Finally, there are specific barriers to traineeships for people with disabilities. In particular, lack of adapted offices and tasks constitute one of the main barriers, as shown by the Eurobarometer 2023. According to results reported in Figure 22, on average in the EU, less than half of the respondents believe that persons with disabilities receive adapted offices or a reasonable adjustment to carry out tasks.

**Figure 22: Access to adapted equipments for trainees with disabilities**



Source: Eurobarometer, 2023. Based on the question inquiring on the perception of respondents with regards to young people with disabilities receiving adapted office equipment and reasonable adjustments needed to carry out their tasks when undertaking a traineeship.

### D3.1.2. Barriers to access to cross-border traineeships

Several factors drive suboptimal take-up of cross-border traineeships. Data from the Eurobarometer 2023 can be used to examine reasons not to have had a cross-border traineeship (Figure 23). Financial resources are particularly relevant. Not having sufficient financial resources was considered an obstacle for 30% of respondents, a figure three times larger in the case of cross-border traineeships compared to traineeships in general. In some a significantly higher share of respondents indicated financial resources as a reason for not undertaking a traineeship abroad (e.g. 43% in EL).

In addition, insufficient information is also an obstacle for 22% of respondents, higher than in the case of traineeships in general (16% in Figure 21). Access to information is further hindered by the diversity in national regulatory systems relating to traineeships, which has been documented based on the legal analysis supporting D1 and D2 (Sections 2.5.2 and 2.5.3). This heterogeneity is likely to constitute a barrier to cross-border traineeships<sup>184</sup>, as it makes it more difficult for trainees to understand requirements and entitlements relating to traineeships in other EU countries. Moreover, it should be noted that lack of financial resources may intersect with informational issues. As highlighted by youth organisations interviewed for this study, young people are often not aware of sources of funding for traineeships - particularly funding for cross-border traineeships - which can lower take up.

184 EC (2013). Impact Assessment Accompanying the Proposal for a Council Recommendation on a Quality Framework for Traineeship, SWD (2013) 495 final.

Figure 23: Reasons not to have had a cross border traineeship



Source: Eurobarometer 2023, Report, p.21. Expressed as percentage of respondents who never had a traineeship.

### D3.2. Insufficient provisions on the quality of hybrid/remote traineeships

As remote and hybrid working arrangements are becoming more common due to the ongoing digital transformation, provisions on ensuring the quality of such working arrangements are needed. The 2014 QFT does not include specific provisions on remote or hybrid traineeships, while the EC (2023a) evaluation highlights specific risks associated with these traineeships, as described in P3 (Section 2.3.3).

Based on the legal analysis (Table 11), it appears that most MS have not introduced formal teleworking arrangements. 10 MS (DE, EE, EL, CY, LV, NL, AT, PT, RO, NL) have no formal teleworking arrangements for any type of traineeships. In countries that do have these arrangements, most often, they apply to all types of traineeships.

Table 11: Legal analysis - existence of teleworking arrangements

	Yes	No	Completeness
OMT	BG, CZ, DK, IE, ES, LT, HU, SI, SK [9 MS]	DE, EE, EL, IT, CY, LV, MT, NL, AT, PL, PT, RO: [12 MS]	1 NA (FR), 5 no data (BE, HR, LU, FI, SE)
ALMP	BG, CZ, DK, IE, LT [5 MS]	DE, EE, EL, ES, CY, LV, NL, AT, PL, PT, RO, SK [12 MS]	2 NA (HU, SI), 8 no data (BE, FR, HR, IT, LU, MT, FI, SE)
ECT	BG, DK, IE, LT, HU, SI [6 MS]	CZ, DE, EE, EL, ES, CY, LV, NL, AT, PL, PT, RO, SK [13 MS]	1 NA (HR), 7 no data (BE, FR, IT, LU, MT, FI, SE)
MPT	CZ, DK, IE (legal, accountant), LT, HU, PL, SI, SK (legal, accountant) [8 MS]	BG, DE, EE, EL, ES, CY, LV, NL, AT, PT, RO [11 MS]	8 no data (BE, FR, HR, IT, LU, MT, FI, SE)

Note: Own analysis. NA indicate cases where such traineeship types are not known (FR for OMT, HU for ALMP). For ALMP, in SI there are no formal traineeship contracts and therefore this is treated as NA. For ECT, HR is marked as NA as these traineeships are conducted on a free market basis.

## 2.6 How likely is the problem to persist?

In the absence of EU action, the Council Recommendation on a Quality Framework for Traineeships continues to represent the essential legal framework for ensuring high-quality traineeships in the EU.

It is expected that **cases of problematic use of traineeships will continue to be present in many EU MS**. This is because the main drivers of the practice of replacing regular workers with trainees, including the diversity in national regulatory approaches, the insufficient enforcement mechanism, the weak position of trainees and the excessive duration of traineeships contracts, are expected to persist.

**As far as the quality of traineeships is concerned, some improvements in the working conditions of trainees are expected.** Traineeships without any remuneration are expected to decline in the future assuming that pre-COVID trends will continue. In addition, recent initiatives at EU level could lead to improvements in the quality of traineeships in the EU by stimulating policies promoting fair remuneration, access to social protection and higher transparency. **Nevertheless, these initiatives will only apply to trainees considered workers under national law or the case-law of the Court of Justice of the EU, thus leaving a large number (~1.5 m trainees in 2019) of individuals outside of their scope.**

**With respect to traineeship accessibility, current evidence of political and socio-economic developments is mixed and whether traineeships will become more accessible in the future is uncertain.** On the one hand, recent socio-economic and political developments (Directive of the European Parliament and of the Council on adequate minimum wages, the Reinforced Youth Guarantee) contribute to making traineeships more accessible to individuals from vulnerable groups. On the other hand, the persistence of problematic practices, the increasing trend in cross-border traineeships and the effects of the COVID-19 pandemic continue to represent an obstacle for expanding traineeships opportunities to individuals from marginalised groups.

## 3 WHY SHOULD THE EU ACT?

### 3.1 Legal basis

This study relies on the understanding and analysis of the legal basis as undertaken by the European Commission. The description can be found in section 4.1 ('Legal basis') of the analytical document accompanying the second-phase of the social partner consultation<sup>185</sup>.

### 3.2 Subsidiarity: Necessity of EU action

Across EU MS, multiple common challenges driven by the twin transition and a demographic decline are currently being compounded with labour shortages, skills gaps, and skills mismatches. Population ageing is already resulting in a decreasing working-age population, which points to urgency in activating the available labour force, nurturing talent and sustaining investments in skills. As skill shortages become more prevalent, additional effort is required to integrate individuals from underrepresented groups such as young people, women, and people with disabilities in the labour markets.

Coordinated EU-level action can help to tackle these structural challenges, by acting both on skills and demographics. Quality traineeships can support labour market integration, especially of young people, by facilitating educational/job-to-job transitions and addressing employers' skill needs, thereby contributing to bridging existing labour market gaps.

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<sup>185</sup> The analytical document can be found [here](#).

However, as demonstrated in Section 2.3 of this document, most MS face challenges related to problematic use, quality, and accessibility of traineeships. The compliance with existing regulatory frameworks and their enforcement mechanisms, the application of proper working conditions to traineeships and their learning content, as well as the effectiveness of national inspection, vary across EU MS (Section 2.5). Such situations reduce the relevance of traineeships, and leave trainees exposed to problematic use of traineeships, endowed with poor instruments to revert unfair treatment.

These challenges can also hinder the effectiveness of EU-level instruments, of which the reinforced YG, supported by EU funds, is a notable case.

Furthermore, evidence underlines the need for a strengthened EU initiative on quality traineeships. The EC (2023a) evaluation of the 2014 QFT and the Eurobarometer 2023 survey, both point to improved quality of traineeships across the EU since 2014, after the adoption of the Council Recommendation. However, concerns persist regarding trainees' working conditions, which have not been adequately addressed by national legislation, and new concerns have been raised with regard to problematic traineeships.

Specifically, the EC (2023a) evaluation shows that the QFT's objective of encouraging more coherent regulatory approaches across MS, especially for OMT, has been achieved only to a limited extent. The principles of the 2014 QFT have been partially incorporated into national legislation and frameworks for traineeships, with significant variation across MS and different types of traineeships. Furthermore, the EC (2023a) evaluation indicates only slight improvement in terms of conformity with the 2014 QFT for OMT, with seven MS fully or mostly aligned with the principles in 2021 compared to four in 2016. There is a more significant improvement for ALMP traineeships, with 18 MS fully or mostly in conformity in 2021 compared to 15 in 2016.

New evidence provided above suggests that the regulatory landscape is not only extremely complex, given differences across MS and across types of traineeships, but the lack of clarity in many respects leads to legal uncertainty and ad hoc practices, which result in suboptimal outcomes (problematic and poor quality traineeships) for trainees and society at large.

Furthermore, the EC (2023a) evaluation highlights that even when national legislation aligns with the QFT, it does not always translate into quality traineeships on the ground.

In addition to already existing (long term) challenges, the COVID-19 pandemic and digital acceleration have raised new challenges (e.g. remote/hybrid traineeships) that are hastening the obsolescence of the QFT. These factors call for EU action to address these issues and face these future challenges.

### **3.3 Subsidiarity: Added value of EU action**

Efforts undertaken by the EU to enhance the use, quality, and accessibility of traineeships hold significant potential in advancing employment opportunities and elevating living and working standards, especially of young people. These objectives align with the explicit mandates enshrined in the EU Treaties. Furthermore, these actions contribute to the fulfilment of the European Pillar of Social Rights, in relations to principles such as active support for employment (Principle 4), equal opportunities (Principle 3), information dissemination regarding employment conditions (Principle 7), as well as education, training, and lifelong learning (Principle 1). Additionally, these endeavours align with the improvement of workers' rights, as outlined in the Charter of Fundamental Rights of the EU, specifically Article 31, which pertains to fair and equitable working conditions.

This initiative can be seen as part of the EU's commitment to safeguarding working conditions and living standards, especially of younger people, and to endow them with the

right tools to face current and future challenges, without neglecting the needs and constraints of enterprises, particularly SMEs. EU action is expected to foster upward social convergence and to promote the coherence of the Single Market by reducing regulatory fragmentation and divergence.

By revising and strengthening the QFT, the EU can contribute to ensure that instruments exist to prevent problematic traineeships, improve their quality, and enhance accessibility. This proactive stance will ultimately enhance the labour market outcomes of workers benefitting from traineeships, thus supporting the application and enforcement of existing social rights and contributing to the overarching objectives of the European Pillar of Social Rights, its Action Plan, and the 2030 employment, skills, and poverty reduction targets.

Furthermore, EU action should address a critical impediment to the cross-border mobility of trainee, namely the lack of information concerning the (working and legal) conditions applied to the traineeship. The adoption of EU-standardised practices and regulations will offer potential trainees clarity regarding the conditions applied in foreign countries.

Diverse regulatory approaches at the national level, coupled with weak monitoring and enforcement mechanisms, result in significant disparities in the protection offered to trainees. Not all trainees benefit from effective access to the protection guaranteed by EU law, national legislation, and CBA. EU action stands to provide substantial added value, particularly in MS lacking (adequate) regulatory frameworks for traineeships. By bolstering national regulatory frameworks for traineeships and strengthening inspection and enforcement mechanisms, the EU will promote the conditions for a minimum common approach to define a protection regime applicable to trainees involved in employment relationships. Its impact will be larger in MS characterised by weak national inspection and enforcement mechanisms.

Provided that this EU action avoids imposing undue burdens on businesses, especially SMEs, it can yield substantial gains by ensuring a level playing field across various economic operators. It will prevent companies from artificially reducing labour costs through problematic traineeship arrangements and ultimately establish a consistent level of protection for trainees across the EU. Moreover, it will expand the pool of (future) workers who have gained (quality) experience and learning through traineeships.

Consistent with the principles of proportionality and subsidiarity, any EU action should not exceed what is necessary to achieve its objectives and must respect the competences of MS and social partners.

## 4 OBJECTIVES: WHAT IS TO BE ACHIEVED?

In view of the issues associated with problematic and poor quality traineeships as well as the unequal access to traineeships, currently insufficiently addressed in the QFT (Section 2.3), the study identified that the general objective of a new EU initiative in this domain could be to improve the use, quality and access to traineeships.

The specific objectives would be to:

- Determine, prevent and combat the problematic use of traineeships;
- Improve working conditions and the training/learning element of traineeships;
- Improve inclusiveness and access to high-quality traineeships.

The initiative is expected to contribute to the United Nations (UN) Sustainable Development Goals (SDGs) of ending poverty (Goal 1), promoting lifelong learning

opportunities for all (Goal 4), promoting full and productive employment and decent work for all (Goal 8), and reducing inequalities within and among countries (Goal 10).

## 5 WHAT ARE THE AVAILABLE POLICY OPTIONS?

### 5.1 What is the baseline from which options are assessed?

This section depicts the ‘no-policy change’ scenario against which the proposed policy options are compared. The identification of the baseline scenario builds on the drivers, problems and consequences identified in the problem definition (respectively Sections 2.5, 2.3 and 2.4) and extrapolates insights about the expected future developments of traineeships in the EU based on past trends of traineeship prevalence, socio-demographic projections and current and expected relevant EU and national policies<sup>186</sup>.

#### 5.1.1 Projected trends in traineeship prevalence

This section describes the trend impact analysis<sup>187</sup> used to obtain projections of the future number of the different types of traineeships in the EU for the period 2022-2030. First, we consider a reference scenario which assumes for each type of traineeship an annual growth rate equal to the average yearly growth rate observed in the five years before the outburst of the COVID-19 pandemic in Europe<sup>188</sup>. Next, we perform a sensitivity analysis in which we assume a more sustained growth of paid OMT and a lower growth rate for unpaid OMT compared to the reference scenario. The development of a high-growth scenario for OMT was motivated by the need to incorporate in the analysis the effects of persistent labour shortages observed in numerous sectors and occupations in Europe. Importantly, these figures should not be interpreted as point forecasts but rather as possible future developments of the number of traineeships in the EU based on current knowledge of trends, socio-economic and political developments.

The linear trend assumption suggests that by 2030 the total number of trainees in Europe will increase by 16.3% compared to its level in 2021. While the number of paid traineeships is expected to increase by 36% (from 1.36 million to 1.85 million), the projections for the number of unpaid traineeships suggest a small increase by 5.3% (from 1.59 million to 1.67 million). Conditioning on the type of traineeship, the largest growth in relative terms concerns MPT, which are projected to increase by 42.8% (from 159 000 in 2021 to 227 000 in 2030). The number of ALMP is expected to increase by 30.7% (from 489 000 to 639 000 trainees), while ECT are expected to increase by 17.5% (from 1.87 million to 2.2 million). The projections for the number of OMT suggest a small increase by

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186 In terms of sources, the analysis of the baseline scenario is informed by (i) our own estimates of traineeship prevalence based on the EU-LFS data (introduced in Section 2.2.2.), (ii) the results of the Eurobarometer 2013 and 2023 surveys focused on traineeship experiences, (iii) the EC (2023a) evaluation, (iv) the EUROPOP2023 population projections, (v) other evaluations and policy reports (e.g. EC (2018a). Traineeships under the Youth Guarantee. Experience from the ground. Luxembourg: Publications Office of the European Union).

187 Quantitative methods assume that forces at work in the past will continue to work in the future and future events that can change past relationships or deflect the trends will not occur or have no appreciable effect. The trend impact analysis is a simple approach to forecasting in which a time series is modified to take into account perceptions about how future events may change extrapolations that would otherwise be surprise-free.

188 The motivation for selecting the 2014–2019 time window is threefold. First, it allows for capturing potential long-lasting effects of the QFT on the prevalence of traineeships in the EU. In addition, it allows for the analysis of structural trends in traineeship prevalence before the disruptive impacts of the COVID-19 pandemic. Finally the introduction of the new Integrated European Social Statistics Framework Regulation in 2021 (see discussion in Section 2.2.1.1) is likely to have generated a break in some time series that would affect the computed growth rates.



**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

6.8% (from 427 000 to 456 000), driven by a decline in the number of paid OMT and an increase in the number of unpaid OMT.

**Table 12: Projected trends by type of traineeship in the EU27 (thousands)**

Year	Linear Trend Assumption		High Growth Scenario
	2021	2030	2030
Paid MPT	159	226 (42.8%)	226 (42.8%)
Paid ECT	576	904 (57.1%)	904 (57.1%)
Paid ALMP	370	474 (28.2%)	474 (28.2%)
Paid OMT	258	248 (-4%)	317 (22.6%)
Unpaid ECT	1 299	1 299 (0%)	1 299 (0%)
Unpaid ALMP	119	165 (38.4%)	165 (38.4%)
Unpaid OMT	169	208 (23.2%)	175 (3.4%)
Total	2 949	3 525 (16.3%)	3 559 (17.1%)

Note: Own elaboration based on the EU-LFS data. The figure shows the projected number of traineeships by traineeship type and based on whether the trainee is paid or not. For each type of traineeship, the projections are based on the average yearly growth rate observed between 2014 to 2019. Column (4) considers a high growth scenario for OMT based on the assumption of a 2.3% and 0.4% yearly growth rate for paid and unpaid OMT, respectively. The percentage growth compared to the 2021 levels is shown in brackets.

Although they are subject to considerable uncertainty, these projections are consistent with expected economic and socio-demographic developments that could affect the number of trainees in Europe. To start, the predicted increase in the number of traineeships is supported by various sources of evidence suggesting that traineeships are becoming increasingly more common in the EU (and worldwide)<sup>189</sup>. Remarkably, in the past years the number of trainees in the EU has been increasing despite the declining trend in the active population aged 15-29 years old<sup>190, 191</sup>.

Nonetheless, persistent labour shortages<sup>192</sup> found in numerous sectors and occupations in Europe are likely to affect the prevalence and quality of traineeships in the EU, even though ex-ante, the effect is difficult to predict<sup>193</sup>. On the one hand, tight labour markets could decrease the number of traineeships since companies could have a stronger incentive to hire employees rather than offering traineeships. These dynamics could explain the small growth rate projected for OMT under the reference scenario. On the other hand, traineeships prevalence could increase due to the implementation of initiatives and policies promoting upskilling and reskilling and supporting individuals in lifelong

189 Stewart, A., Owens, R., O'Higgins, N., & Hewitt, A. (Eds.). (2021). Internships, employability and the search for decent work experience. Edward Elgar Publishing.

190 Between 2013 and 2019, the EU active population aged 15-29 years, which represents the main age category of individuals undertaking traineeships (Section 2.2.4), decreased by 4.4% (-1.85 million). This downward trend has been driven by the shrinking population aged 15-29 years, which decreased by 4.6% during the same period. In contrast, the number of paid trainees increased by 25% (from 1.28 to 1.61 million), representing an increase in the share of paid trainees in the active population aged 15-29 years old of 0.9 percentage points. The share of unpaid trainees remained roughly constant during the same period and increased significantly in 2020, probably as a result of the COVID-19 shock.

191 This finding is consistent with evidence from a global online survey of enterprises conducted from April to June 2020 which found that nearly half of the 901 enterprises and organisations stopped paying a stipend or wages to apprentices and trainees. See ILO (2021), Skilling, upskilling and reskilling of employees, apprentices and interns during the COVID-19 pandemic: Findings from a global survey of enterprises. International Labour Office – Geneva).

192 ESDE (2023). Addressing Labour Shortages and Skills Gaps in the EU. Luxembourg: Publications Office of the European Union.

193 Labour shortages are found across high-, middle- and low-skilled occupations, including science, technology, engineering, mathematics (STEM), ICT, manufacturing and construction, healthcare, and hospitality. Shortages in both high- and low-skilled occupations are expected to increase considerably in the future due to numerous structural factors. These include employers' difficulties in finding properly skilled workers, their inability to attract and retain workers due to poor working conditions, the limited supply of skilled workers in certain sectors, rapid changes in skills and employment needs due to green and digital transitions.

learning pathways<sup>194</sup>. In addition, labour shortages could help trainees obtain better working conditions, as they provide an opportunity to demand fairer remuneration and better training opportunities<sup>195</sup>. To capture these trends, we consider a high-growth scenario that envisages an increase in the number of paid OMT and a smaller increase in the number of unpaid OMT<sup>196</sup>. The scenario also assumes that ALMP, ECT and MPT traineeships continue to grow according to the linear trend. Under this assumption, the overall number of traineeships in the EU would increase by 17.1% due to the increase in the number of paid OMT (+22.6%) and a small increase in the number of unpaid OMT traineeships of 3.4%.

The projected increase in the number of **ALMP traineeships** is consistent with the expected impacts of the Reinforced Youth Guarantee (RYG) (2020/C 372/01)<sup>197</sup>. Evidence from the 2013 YG monitoring data suggests that traineeships were the second most used measure after employment, with ALMP representing the most significant type of traineeship available<sup>198</sup>. The RYG can be expected to produce at least similar impacts on traineeship prevalence and quality compared to the prior YG since it extends its coverage to all people aged 15-29 years old (compared to the 15-24 age group targeted by the original YG) and mobilises a significantly larger amount of financial resources<sup>199</sup>.

Last, the projected increase in the total number of **trainees in education**<sup>200</sup> (ECT and MPT) in the baseline (and high growth) is in line with current evidence from Eurostat suggesting that the share of people with tertiary education in the EU, which represent the largest parts of ECT and MPT trainees, is trending upward<sup>201</sup>.

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194 At EU level, these initiatives are supported by the 2023 European Year of Skills which sets out a five-year framework for EU skills policies to help businesses and individuals develop and apply skills for sustainable competitiveness, social fairness and resilience. ESDE (2023). Addressing Labour Shortages and Skills Gaps in the EU. Luxembourg: Publications Office of the European Union.

195 Recent evidence based on firm-level data spanning 27 EU countries found that firms with higher labour shortages across time pay a wage growth premium to keep incumbent and attract new workers. The wage growth was more pronounced among fast-growing or labour-intensive firms. Groiss, M. & Sondermann, D.(2023). Help wanted: the drivers and implications of labour shortages. Working Paper Series 2863, European Central Bank.

196 The high growth scenario is based on the assumption of a 2.3% yearly growth rate of paid OMT and a 0.4% yearly growth rate for unpaid OMT (as opposed to the -0.4% and +2.3% yearly growth rate under the linear trend assumption). These correspond to the weighted average yearly growth rates of paid and unpaid traineeships (all types of traineeships) in the time horizon considered.

197 The RYG represents a commitment by MS to ensure that all young people below 30 receive a good quality offer of employment, continuous education, apprenticeship, or traineeship within four months of becoming unemployed or leaving education.

198 More in detail, in 2016, of the 2.1 million people aged 15-24 enrolled in the YG, 67.2% took up an employment offer within four months of registering to the initiative, 13.9% took up a traineeship offer, 12% continued education and 6.9% took up an apprenticeship offer. ALMP represented the most significant type of traineeships, with 87.6% and 76.8% of the total traineeships being partly or fully subsidised with public funds in 2015 and 2016, respectively. MS did not report on their other types of traineeships in the YG data collection. See EC (2018a). Traineeships under the Youth Guarantee. Experience from the ground. Luxembourg: Publications Office of the European Union.

199 In particular, the main source of EU funds for the programming period 2021-2027 is represented by the Youth Employment Initiative, one of the four funding instruments of the European Social Fund Plus (ESF+). In addition, MS with a rate of young people (aged 15-29) not in employment, education or training (NEET) exceeding the average for the 2017-2019 period should devote at least 12.5% of their ESF+ resources to youth employment. Under the ESF+, almost EUR 99.3 billion will be invested in EU's employment, social education and skills policies for the programming period 2021-2027. In addition, the ESF+ is assisted by the Recovery Assistance for Cohesion and the Territories of Europe (REACT-EU). Launched in 2020, the REACT-EU adds EUR 47.5 billion of additional funds provided in 2021-2022 via the NextGenerationEU temporary recovery instrument.

200 It is estimated that between 2021 and 2030 the number of ECT and MPT traineeships will increase by 17.5% and 42.8% respectively.

201 In particular, the share of people aged 25-74 years with tertiary education has increased from 24.5% in 2012 to 31.8% in 2022, with younger cohorts reaching higher levels of education than older ones. In 2022, 37.7% of those aged 25-54 years had reached tertiary education (22.7% for those aged 55-74). These trends are influenced by socio-economic dynamics and policy initiatives. See [https://ec.europa.eu/eurostat/statistics-explained/Educational\\_attainment\\_statistics](https://ec.europa.eu/eurostat/statistics-explained/Educational_attainment_statistics).

### 5.1.2 Problematic use of traineeships under the baseline scenario

The drivers of problematic traineeships (see Section 2.5, in particular 2.5.2) are expected to persist in the absence of policy intervention. Despite recent evidence of improvements in the degree of conformity of national regulatory systems with the QFT principles, the diversity and complexity of national legal frameworks for traineeships between and within MS are likely to remain.

As explained in Sections 2.2.3 and 2.5.2, for **trainees who qualify as workers** under national law and/or the case law of the Court of Justice of the European Union, protection against abusive practices will continue to be governed by the Fixed-Term Work Directive (1999/70/EC) and the Part-Time Work Directive (1997/81/EC). In the absence of further policy interventions, the number of trainees undertaking **excessively long traineeships**, including trainees doing consecutive traineeships with the same employers, is likely to remain high for all types of traineeships<sup>202</sup>.

With the exception of ALMP traineeships, the evidence from the section on problem drivers (D1.2. in Section 2.5.2 in particular) suggests that **monitoring and control mechanisms** for traineeships are still missing in several countries and, when in place, their effectiveness is often hindered by the limited resources of labour inspectorates. Similarly, assuming that recent trends will continue, procedures for complaints and systems for inspection would continue to be missing in the majority of the EU MS. Last, the problem of poor monitoring and enforcement capacity is likely to continue to be exacerbated by the lack of comprehensive and comparable data on the prevalence and quality of traineeships in the EU.

The persistence of these problem drivers enables problematic traineeships, in particular, the misuse of traineeships from employers substituting entry-level jobs with trainees (see Figure 1). From a demand-side perspective, there is no evidence indicating that the economic incentives that push some TP to hire trainees as a cheap source of labour are going to disappear in the coming years. From a supply-side perspective, many job-seekers, especially in sectors with high competition among job candidates, can still be expected to accept unpaid work.

### 5.1.3 Traineeships of poor quality under the baseline scenario

In the absence of policy changes, the Council Recommendation on a Quality Framework for Traineeships continues to represent the essential framework to address and improve traineeships' standards in the EU, without any legal obligation for MS to respect the principles set out by the Recommendation. Despite the non-binding nature of the 2014 QFT, evidence from the EC (2023a) evaluation of the QFT suggests that the degree of conformity of national regulatory systems with the principles of the QFT improved in recent years<sup>203</sup>. Based on our legal analysis, several countries adopted legislative updates

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202 Evidence on trends in traineeship duration come from Ecorys (2023) study supporting the evaluation of the Quality Framework for Traineeships and the Eurobarometer 2023 Survey on the Integration of young people into the labour market with a particular focus on traineeships. This evidence is discussed in Section 2.3.1.2. In addition, the results of the recent Eurobarometer 2023 indicate that consecutive traineeships with the same employers could continue to affect roughly one-fifth of the total stock of trainees (among the 52% of the respondents who undertook at least two traineeships, 37% of them did consecutive traineeships with the same employer).

203 According to the EC (2023a) evaluation, between 2016 and 2021, the number of MS fully or mostly aligned with the QFT increased from four to seven and from 15 to 18 for respectively OMT and ALMP traineeships. See also D2.2. in Section 2.5.3 for specific considerations on the learning components and transparency of vacancies.

on trainees' minimum remuneration and/or access to social protection in the last three years<sup>204</sup>.

In terms of coverage of the different types of traineeships, existing gaps are expected to persist as ECT and MPT will continue to be uncovered by the QFT<sup>205</sup>.

Recent policy developments can be expected to improve the quality of traineeships and to contribute to the effective application of the principles of the QFT for trainees who are considered workers under national law and/or the case law of the Court of Justice of the European Union.

**The Directive 2019/1152 on Transparent and Predictable Working Conditions** obliges employers to inform workers about the essential aspects of the employment relationship in written form<sup>206</sup>. Thus, the Directive could contribute to ensuring that some of the principles and recommendations of the 2014 QFT (including aspects related to duration, remuneration and tasks) are further included in written traineeships agreements<sup>207</sup>. Moreover, **the Council Recommendation on access to social protection for workers and the self-employed** (2019/C 387/01) calls for MS to "provide access to social protection to all workers and self-employed persons in the MS" and explicitly mentions trainees among the categories of workers that are excluded from social protection in some MS. Current evidence from the 2023 report on the implementation of the Council Recommendation<sup>208</sup> shows that the impact on trainees' access to social protection could be limited, suggesting that the Council Recommendation needs to be supported by additional measures to guarantee access to social protection to trainees, such as more effective monitoring and initiatives aimed at reducing the incentives to hire trainees without granting them social protection coverage<sup>209</sup>.

Moreover, positive impacts for access to adequate minimum remuneration could be expected from **the 2022 Directive of the European Parliament and of the Council on adequate minimum wages in the European Union** (2022/2041), which will have to be transposed into national law by MS by 15 November 2024. The Directive calls for MS with statutory minimum wages to establish a framework to improve periodically their adequacy, to promote collective bargaining and enhance the effective access of workers to statutory minimum wages through a variety of measures, including field inspections conducted by labour inspectorates and training and guidance for enforcement authorities. In addition, it establishes that MS that allow for remuneration levels below the relevant statutory minimum wage for specific groups of workers shall ensure that the principles of non-discrimination and proportionality are respected. The Directive applies to all workers who have an employment contract or relationship as defined by the law, CBA or practice in force in each MS, with consideration to the case-law of the Court of Justice of the EU and explicitly mentions trainees among the persons who could fall in the scope of the

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204 Namely BE, CY, DK, ES, IT, LU, PL, PT, RO.

205 Importantly, these two types of traineeships represent roughly 70% of the total number of traineeships in the EU in 2021. And, according to the baseline projections, by 2030 their share could further increase by 10 percentage points compared to the 2021 level.

206 Directive (EU) 2019/1152 of the European Parliament and of the Council of 20 June 2019 on transparent and predictable working conditions in the European Union. The Directive reinforced information obligations in comparison to the previous Written Statement Directive (91/533/EEC) that was repealed.

207 The Directive, which had to be transposed into national legislation by 1 August 2022, has been implemented in all EU jurisdictions except CZ, LU, AT and SI. Importantly, it will only apply to trainees who are considered workers.

208 See EC (2023c). Report from the Commission to the Council on the implementation of the Council Recommendation on Access to social protection for workers and the self-employed, COM(2023) 43 final.

209 The study found that, although 15 MS have undertaken or planned important reforms to expand participation to social protection, most MS are not aiming at closing existing gaps and a large number of people is lacking effective coverage. In addition, the report emphasised how gaps to accessing social protection for workers are more pronounced among young people due to issues of effective coverage and of lack of formal coverage for specific categories, such as trainees. See EC (2023c). Report from the Commission to the Council on the implementation of the Council Recommendation on Access to social protection for workers and the self-employed, COM(2023) 43 final.

Directive. Thus, it could affect trainees who are considered workers under national law and/or the case-law of the Court of Justice of the European Union<sup>210</sup>.

Overall, these policy initiatives are expected to improve the quality of traineeships for trainees who are considered workers under national and/or EU law. Nonetheless, in the absence of a policy intervention, some of the trainees who do not classify as workers would continue to suffer from poor working conditions. The number of such (i.e. unpaid) trainees is expected to stay roughly constant in the coming years<sup>211</sup>. In addition to that, some problem drivers are expected to persist also for trainees who classify as workers. These include aspects related to access to social protection (D2.1.2. in Section 2.5.3), and the poor learning content of traineeships and transparency of the working conditions in traineeship vacancies (D2.2. in Section 2.5.3). With respect to the learning content, the **Council Recommendation on individual learning accounts (2022/C 243/03)** may contribute to filling some learning gaps by supporting the access of all working-age adults (irrespective of their labour force or professional status) to training, however, it will depend on the implementation of the Recommendation by MS.

#### 5.1.4 Unequal access to traineeships and the quality of cross-border traineeships under the baseline scenario

The policy and socio-economic developments discussed above are expected to produce contrasting effects on traineeship accessibility. On the one hand, the persistence of problematic traineeships and limited access to remuneration and social protection for some trainees are likely to maintain existing inequalities in accessibility to traineeship opportunities. Evidence from the EC (2023a) QFT Evaluation and the 2023 Eurobarometer suggests that, despite an increasing trend in the prevalence of cross-border traineeships (from 11% in 2013 to 21% in 2023), barriers connected to lack of financial resources, interest of trainees, information as well as differences in the national legislative frameworks for traineeships represent an obstacle to increasing trainees cross-border mobility (D3.1. Section 2.5.4). The increasing trend in the number of cross-border traineeships represents an additional source of inequalities, since financial barriers (also connected to relocating) represent a major obstacle to undertaking these traineeships for some disadvantaged individuals. On the other hand, recent political and socio-economic developments contribute to making traineeships access more equitable. **Council Directive 2000/78/EC establishing a general framework for equal treatment in employment and occupation** introduced the principle of equal treatment in employment and occupation to combat discrimination on the grounds of religion, disability, age or sexual orientation. The Directive also requires employers to provide reasonable accommodation for persons with disabilities. More recently, the provisions on the proportionality/non-discrimination of the possible different rates of statutory minimum wage for specific groups of workers in Article 6 of the **Directive of the European Parliament and of the Council on adequate minimum wages in the European Union** could improve the accessibility of paid traineeships for individuals who may lack the financial resources to undertake traineeships paid (significantly) below the minimum wage<sup>212</sup>. In addition, since ALMP target disadvantaged young people at risk of social exclusion (see also Section 2.2.4), the expected increase in this type of traineeships under the **RYG** could contribute significantly to making traineeships more inclusive and improve access for (more) disadvantaged groups on the labour market. Finally, the

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210 The Directive directly impacts those MS that already have a statutory minimum wage (as of 1 January 2023, these include 22 countries). As far as MS without a statutory minimum wage are concerned, the Directive establishes that where collective bargaining coverage falls below a threshold of 80%, Member States should establish an action plan to promote collective bargaining to progressively increase the bargaining coverage rate.

211 It should be noted that the concept of working conditions is a multidimensional one, and whether a traineeship is remunerated or not only represents a proxy variable of the overall quality of a traineeship.

212 See D2.1.1 in Section 2.5.3 for a mapping of remuneration requirements by type of traineeships and MS.

increase in remote forms of work triggered by the pandemic could increase traineeship accessibility for certain groups of individuals, including people with disabilities, by alleviating for instance, commuting barriers for individuals who face mobility challenges<sup>213</sup> or financial constraints to relocate.

## 5.2 Description of the policy options

The policy options considered aim to contribute to the objectives presented in Section 4 and address the three identified problems of 1) problematic traineeships (Section 2.3.1); 2) poor quality traineeships (Section 2.3.2); and 3) unequal access to quality traineeships (Section 2.3.3). To address each problem, different policy measures have been identified, which could be adopted separately or in combination. To reduce complexity, in line with BR Tool#16, we assess the impacts of policy measures individually for each problem or policy area. The impact on related policy areas is still identified and analysed where relevant. Since the drivers and problems are weakly related, some policy measures may also impact other areas.

The policy options cover different material scopes in terms of types of trainees (considered worker or not, and across the four types of traineeships) and potential instruments (directive or recommendation). In general, in line with TFEU Articles 153(1) and 153(2)(b), the EU may not introduce social policy measures beyond directives and minimum requirements. In addition, under Article 153(1)(b) TFEU, the EU can only legislate on the working conditions of workers, defined as natural persons performing services for and under the direction of another person in return for remuneration<sup>214</sup>, in which case only remunerated trainees would be in the scope. Therefore, any new legislative initiative under Article 153(1) TFEU could only apply to remunerated trainees, while a non-legislative instrument such as a recommendation could apply to all trainees, considered workers or not.

Some of the proposed measures are in line with the recommendations of the 2023 EP Resolution, while some other recommendations were discarded as explained in Section 5.3. According to interviewees from European trade union associations, employer organisations and youth organisations, extending the scope of the QFT to ECT and MPT would be beneficial to ensure that the same quality standards apply to all traineeships.

### 5.2.1 Policy options addressing the problematic use of traineeships (Policy area 1)

This policy area aims to address the issues related to problematic traineeships. The measures considered include:

- **1.1. Measures to determine problematic traineeships:** aimed at providing guidance, elements or criteria to support national competent authorities in the identification of problematic traineeships and enforcement of measures on quality traineeships. These measures could be binding for trainees considered workers (i.e. paid trainees). These measures address the call of the 2023 EP Resolution to not allow the replacement of employees by trainees. P.1.1.1 and P.1.1.2 are mutually exclusive. These would include:
  - P.1.1.1: **The MS would determine problematic traineeships**, with criteria and indicators that could be used in inspections or enforcement actions.

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<sup>213</sup> Nonetheless, individuals with other forms of disabilities, such as those with visual or hearing impairments, would not benefit from the increase in remote forms of work.

<sup>214</sup> EC (2018c). Impact Assessment Accompanying the document Proposal for a Council Recommendation on access to social protection for workers and the self-employed, SWD(2018) 70 final.

- o P.1.1.2: **The Commission would define a list of elements to be taken into consideration by competent authorities to determine problematic traineeships**, with criteria and indicators to be used in inspections or enforcement actions.
- **1.2. Measures to prevent problematic traineeships:** aimed at preventing several manifestations of the problematic use of traineeships. These measures could be binding for trainees considered workers (i.e. paid trainees) and non-binding for other trainees (i.e. unpaid trainees). P.1.2.1, P.1.2.2 and P.1.2.3 could be combined. These would include:
  - o P.1.2.1: **Set the maximum total duration of traineeships with the same employer to six months, except in duly justified cases.** This would reinforce QFT principle 10 on reasonable duration of traineeships. MPT may be exempted from this measure if their justified duration is longer than six months.
  - o P.1.2.2: **Ensure that employers do not require candidates for traineeships to have previous working experience in the field of activity.** This measure aims at preventing consecutive traineeships for the same trainee across several organisations and means that traineeship vacancies should not require applicants to have previous experience in the field.
  - o P.1.2.3: **Obligation to employers to provide, in the vacancy notices, information on the expected tasks, learning content, working conditions, remuneration and social protection.** This measure would ensure transparency on working conditions and learning content before the traineeship and help to detect problematic traineeships.
- **1.3. Measures to strengthen inspections and enforcement:** aiming to ensure sufficient resources and controls of national enforcement authorities. These measures address the call of the 2023 EP Resolution to enforce compliance with existing regulations on high-quality traineeships. These measures could be binding for trainees considered workers (i.e. paid trainees). P.1.3.1 and P.1.3.2 could be combined. These include:
  - o P.1.3.1: The MS would need to **ensure effective targeted controls and inspections and take enforcement measures to address problematic traineeships.** These actions would be based on the list of elements to define problematic traineeships from the block of measures 1.1.
  - o P.1.3.2: The MS would need to **ensure provision of human, technical and financial resources to competent authorities to perform effective controls and inspections.** Such controls would be expected to identify problematic traineeships in line with P.1.3.1 with the elements defined in the block of measures 1.1.
- **1.4. Supporting measures for trainees:** aimed at ensuring that trainees can report malpractices and seek redress. These measures reflect one of the additional principles for an updated QFT proposed by the 2023 EP Resolution. These measures could be binding for trainees considered workers (i.e. paid trainees) and non-binding for other trainees (i.e. unpaid trainees). P.1.4.1 and P.1.4.2 could be combined. These include:
  - o P.1.4.1: **Creating or using existing channels for reporting malpractice and poor traineeship conditions during and after the traineeship period.** This could be used by trainees or their representatives and would help them to seek redress or enforcement.
  - o P.1.4.2: **Ensure the possibility for workers representatives (and possibly other actors with a legitimate interest) to engage in procedures to enforce the rights of trainees.** This would empower

workers' representative or other relevant actors to support the enforcement of trainees' rights.

## 5.2.2 Policy options addressing the poor quality of traineeships (Policy area 2)

This policy area envisages measures to address the issue of working conditions on the one hand, and issues related to insufficient transparency on working conditions and learning content of traineeships on the other hand.

To address these issues, the measures envisaged include:

- **2.1. Measures on working conditions, including remuneration and access to social protection for trainees.** Certain measures reflect some of the additional principles for an updated QFT proposed by the 2023 EP Resolution. P.2.1.1 and P.2.1.2 could be combined. These measures would include:
  - **2.1.1. Ensure fair/ proportionate remuneration/ compensation for trainees.** This measure could be binding for trainees considered workers (i.e. paid trainees) and non-binding for other trainees (i.e. unpaid trainees).
  - **2.1.2. Non-binding instrument or guidance to ensure that trainees have access to social protection.** This would be applicable to all trainees and take account of the national social protection systems.
- **2.2. Measures to improve transparency on working conditions of trainees and on the learning component:** obligations of written transparency before and during the traineeship on the working conditions, learning content and tasks. These measures would reflect some of the additional principles for an updated QFT proposed by the 2023 EP Resolution. These measures could be binding for trainees considered workers (i.e. paid trainees) and non-binding for other trainees (i.e. unpaid trainees). P.2.2.1 and P.2.2.2 are mutually exclusive. These measures would include:
  - **P.2.2.1: Obligation to employers to provide all trainees with individual written information on the learning objectives and content of the traineeship, including information on supervision, mentorship and evaluation.** The measure would provide transparency on the learning content at the beginning of the traineeship.
  - **P.2.2.2. Obligation to employers to provide a written traineeship agreement, including for example the expected tasks, learning content (including information on supervision, mentorship and evaluation), working conditions, remuneration and social protection.** The measure would provide transparency on the working conditions and the learning content at the beginning of the traineeship and would reinforce the QFT and the Directive on transparent and predictable working conditions.

## 5.2.3 Policy options addressing the unequal access to quality traineeships (Policy area 3)

This policy area aims to address the issues related to barriers to access to traineeships for vulnerable groups, insufficient access to quality cross-border and remote/hybrid traineeships. This set of policy measures aims to address gaps identified in the EC (2023a) evaluation of the QFT and would feature in an updated QFT recommendation applicable to all trainees.

The measures envisaged are all cumulative and include:



- **3.1. Non-binding instrument or guidance on improving access to traineeships for vulnerable groups.** These measures would reinforce the application of the Directive on equal treatment in employment and occupation and reflect some of the additional principles for an updated QFT proposed by the 2023 EP Resolution. The measures would include:
  - P.3.1.1: **Ensure the accessibility of persons with disabilities with accessible workplace**, thus applying the framework on persons with disabilities at work to trainees.
  - P.3.1.2: **Ensure inclusiveness of traineeships to all vulnerable groups with outreach activities** in order to increase awareness, applications and inclusion of persons from vulnerable groups in traineeships.
- **3.2. Non-binding instrument or guidance on improving cross-border traineeships.** The measures would echo some of the recommendations of the EP Resolution. The measures would include:
  - P.3.2.1: 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 MS and by **reducing administrative formalities**.
  - P.3.2.2: **Make use of the EURES network** and exchange information on paid traineeships through the EURES portal in line with the corresponding provisions of the EURES Regulation.
  - P.3.2.3: Further develop with the EURES European Coordination Office (within the European Labour Authority) **practical guidance material and information for (potential) trainees on cross-border traineeships** through EURES.
  - P.3.2.4: **In case of mobility outside the European Union, promote respect for the QFT, where applicable, in agreements** between educational institutions and traineeship providers.
- **3.3. Non-binding instrument or guidance to facilitate and improve remote and hybrid traineeships** including with the access to digital work tools. The measures reflect some of the additional principles for an updated QFT proposed by the 2023 EP Resolution.

#### 5.2.4 Accompanying measures

All the policy measures across the three policy areas can be introduced in combination with accompanying measures. The accompanying measures address other complementing factors hampering the use, quality and access to traineeships such as weak monitoring and lack of data on traineeships, insufficient involvement of social partners and stakeholders, insufficient awareness of QFT principles and insufficient resources (in particular for SMEs) to provide quality traineeships.

The measures would include:

- 4.1. Ensure the effective involvement of social partners and other relevant stakeholders, in the implementation and monitoring of the rights and obligations arising from this initiative.
- 4.2 Improve monitoring and data collection on prevalence (also disaggregated by personal characteristics) and quality of traineeships (e.g. average duration), including their remuneration and social benefits.

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

- 4.3. Strengthen awareness raising, partnerships between relevant stakeholders and the exchange of best practices in the area of high-quality traineeships.
- 4.4. Support to employers (financial and/or practical guidance), in particular small and micro enterprises, to provide high-quality traineeships.
- 4.5. Encourage the use of European funds to support quality traineeships.

Measures 4.1, 4.2, 4.3, and 4.5 are in line with some of the recommendations from the 2023 EP Resolution.

The intervention logic below presents the links between the drivers, problems, specific objectives and policy measures.

**Figure 24: Intervention logic**

Problem drivers	Problems	Specific objectives	Policy measures
D1.1 Diversity in national regulatory approaches regarding the legal status of trainees and traineeships D1.2 Insufficient enforcement of applicable law and lack of capacity for controls and inspections D1.3 Weak position of trainees D1.4 Long duration of traineeships, including consecutive traineeships (with the same employer) and share of trainees in a company	P1: Problematic use of traineeships	1. Prevent and combat the problematic use of traineeships	Policy area 1. Policy options addressing the problematic use of traineeships: 1.1 Measures to determine problematic traineeships 1.2 Measures to prevent problematic traineeships 1.3 Measures to strengthen inspections and enforcement 1.4 Supporting measures for trainees
D2.1 Issues related to working conditions for trainees: - D2.1.1 Remuneration and equal treatment - D2.1.2 Access to social protection D2.2. Insufficient learning content of traineeships: -D2.2.1 Weak provision on learning component of traineeships: mentorship and supervision -D2.2.2 Lack of transparency in vacancy notices	P2: Traineeships of poor quality	2. Improve the quality of traineeships in terms of working conditions and training components	Policy area 2. Policy options addressing the poor quality of traineeships: 2.1: Fair remuneration and social protection 2.2: Transparency on working conditions and learning content
D3.1 Barriers of access to traineeship, including cross-border traineeships: - D3.1.1 for vulnerable groups - D3.1.2 for traineeship providers D3.2. Insufficient quality of hybrid/remote traineeships D3.3 Different rules apply to different types of traineeships	P3: Unequal access to traineeships	3. Improve access to high quality traineeships	Policy area 3. Policy options addressing the unequal access to quality traineeships: 1.1 Non-binding guidance on improving access to traineeships for vulnerable groups 1.2 Non-binding guidance on improving cross-border traineeships 1.3 Non-binding guidance on improving remote/hybrid traineeships
			Accompanying measures: 4.1. Involvement of social partners and stakeholders 4.2. Monitoring and data collection 4.3. Awareness raising 4.4. Support to employers 4.5. Encourage use of European funds

Source: own elaboration

In addition, Annex 4 presents how the proposed policy measures address the relevant results of the EC (2023a) evaluation of the QFT.

### 5.3 Options discarded at an early stage

Some recommendations emerging from the EC (2023a) QFT evaluation and the 2023 EP Resolution were discarded based on the Treaty obligation to ensure that proposals respect EU competence, proportionality and subsidiarity.

**The option of mandatory remuneration for all trainees** was discarded on the basis of TFEU Article 153(5) since the EU does not have competence to directly interfere with pay,

for instance by requiring a MS to oblige an employer to pay an unpaid trainee and thereby render that unpaid trainee a worker. Therefore, only guidance or soft measures on transparency of remuneration level and its criteria could be considered for trainees who are not workers under EU law.

Similarly, **the option of mandatory access to social protection for trainees** was discarded due to the disproportionate burden it may place on national social security systems and businesses. In line with TFEU Articles 153(1)(c), and 153(4), measures may be adopted in the field of social protection, but they shall not significantly affect the financial equilibrium of MS' social security systems and shall avoid imposing administrative, financial and legal constraints in a way which would hold back the creation and development of small and medium-sized undertakings.

## 6 WHAT ARE THE IMPACTS OF THE POLICY OPTIONS?

This Section contains an analysis of the expected impacts of the different policy options on a variety of stakeholders, including traineeship providers (TP), employers, trainees, public authorities (PA) and the rest of the workforce. We start by identifying the direct and indirect effects of each policy measure from an economic, societal and fundamental rights perspective. The economic dimension covers the monetary gains and losses induced by the initiatives on the different stakeholders; the social dimension examines the impacts of the measures on working conditions, social mobility, education and learning for individuals and businesses. The fundamental rights dimension refers to the rights enshrined in the EU Charter of Fundamental Rights. No relevant environmental impacts were identified. Importantly, compared to binding policy initiatives, the impacts of non-binding instruments will largely depend on the degree of implementation of the provisions in the national regulatory frameworks of the MS, which can vary as can be seen in the EC (2023a) evaluation of the QFT. The analysis combined the use of qualitative and quantitative methods based on primary and secondary data sources.

### 6.1 Identification of impacts of measures under Policy Area 1

The first set of policy measures aims at addressing the problematic use of traineeships by preventing and combating the practice of replacing entry-level jobs with trainees and traineeships that do not comply with EU and national law (Section 2.1.2). The impacts of these policy options contribute to making progress towards some of the UN Sustainable Development Goals (SDGs). By directly combating problematic traineeships, they ensure an improvement of the working conditions of trainees exposed to such practices and contribute to the goal of ensuring decent working conditions for all (SDG 8). Since individuals from vulnerable socio-economic backgrounds suffer more from misuse or non-compliant traineeship practices<sup>215</sup>, a decline in the number of problematic traineeships would also reduce inequalities within countries (SDG 10) and would contribute to reducing the number of people at risk of poverty and social exclusion in the EU MS (SDG 1).

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215 Eurofound (2017). Fraudulent contracting of work: abusing traineeship status (Austria, Finland, Spain and UK), Eurofound, Dublin.

### 6.1.1 Impacts under the baseline scenario

Under the baseline scenario, the practice of replacing paid employees with trainees is expected to persist and to exert downward pressure on wages and opportunities for entry-level workers in the coming years. Quantitative evidence on the number of problematic traineeships in Europe is difficult to obtain due to the fraudulent nature of this form of work and the fact that differences between “real” work and traineeships are often blurred. To obtain an approximate estimation of the number of trainees who are victims of problematic traineeships in Europe, we use data from the Eurobarometer 2023 Survey covering aspects related to learning content and traineeship duration, including consecutive traineeships with the same employer. Traineeships are classified as problematic based on the simultaneous presence of several criteria deemed as indicators of potential misuse or non-compliance. A detailed explanation of the methodology used is provided in Annex 3. These estimates suggest that 370 000 paid trainees did a traineeship longer than six months (including consecutive traineeships with the same employer), out of which 100 000 trainees did a long duration traineeship with poor learning content.

From an **economic** perspective, the problematic use of traineeships create unfair market competition as some companies will continue to lower their labour costs by hiring trainees<sup>216</sup>. Remarkably, also TP exploiting problematic traineeships could bear the costs of these practices since inexperienced trainees with low competences could be a sub-optimal solution to replace regular workers<sup>217</sup>. In addition, since trainees who are subject to problematic traineeship are usually prevented from enjoying good working conditions and opportunities for learning and being mentored, traineeships of this type will continue to impose **social** costs at an individual and societal level (see also Sections 2.4.1 and 2.4.3). Trade union representatives interviewed in AT, FI and ES for the 2017 Eurofound study<sup>218</sup> argued that problematic traineeships do not lead to improvements in people’s skills and employability. They also argued that these types of traineeships, which are often unpaid, contribute to greater inequality in access by reserving work experience to certain socioeconomic groups. In particular, labour inspectors in FI reported that individuals from vulnerable backgrounds are often more exposed to fraudulent practices. From the perspective of **PA**, the persistence of problematic use of traineeships entails enforcement costs to detect and make such traineeships compliant. These costs are expected to be higher in countries where the prevalence of problematic traineeships is greater.

### 6.1.2 Common social impacts associated with measures aimed at reducing the number of problematic traineeships (Policy area 1)

The decline of problematic traineeships would directly improve the wellbeing of **trainees** who are victims of non-compliant and misuse of traineeships, as they would start enjoying most of the rights associated with employee status (such as fair remuneration and access to social protection) if they are considered regular workers. Indirectly, this would benefit the entire **youth workforce** thanks to a reduction in the downward pressure that these practices exert on working conditions in general<sup>219</sup>. Since people from vulnerable socio-economic groups are more likely to be victims of abusive practices, these interventions could also improve the overall accessibility of good quality traineeships to minorities.

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216 See also the discussion of consequence C6 in Section 2.4.2.

217 This aspect was stressed by Spanish employer organisations in Eurofound (2017) *Fraudulent contracting of work: Abusing traineeship status* (Austria, Finland, Spain and UK), Eurofound, Dublin.

218 Eurofound (2017) *Fraudulent contracting of work: Abusing traineeship status* (Austria, Finland, Spain and UK), Eurofound, Dublin.

219 Arrizabalo Montoro X, del Rosal Crespo M, and Murillo Arroyo FJ (2023). *False self-employment and bogus internships in Spain*. *The Economic and Labour Relations Review* 34, 314–327.

For **TP**, those employers who were engaged in problematic traineeships practices could enjoy the benefits of having a better working environment, where employees and trainees are more satisfied. They also forego the potential reputational damage of having their traineeship policies questioned.

### 6.1.3 Common economic impacts of measures aimed at reducing the number of problematic traineeships (Policy area 1)

From the perspective of **trainees**, the decline in the number of problematic traineeships could produce indirect economic benefits, including improvements in productivity and an easier transition to the labour market.

As far as **employers** are concerned, the appropriate use of traineeship schemes could increase businesses' competitiveness and productivity. Employers hiring regular workers instead of trainees could enjoy the benefits of having a more qualified and competent workforce. Providers of good quality traineeships and non-TP could benefit from fairer market competition as some companies are prevented from lowering their labour costs by hiring trainees. Traineeship relations that are reclassified as working relations would also increase the labour costs sustained by some TP, due to increases in remuneration and social security expenditures. Nonetheless, the increase in labour costs can be expected to be limited since trainees (should) only represent a small fraction of the workforce of an organisation. Since cases of problematic traineeships are not equally distributed in the economy, some sectors will be more affected than others. Those sectors in which problematic practices are more common will be impacted the most. Importantly, these sectors are not necessarily the same across countries<sup>220</sup>. Since there is no evidence of differences in the prevalence of problematic traineeships based on firms' size, SMEs and large companies could be similarly affected by the potential increase in adjustment costs and the number of court cases.

Potential benefits for **PA** could be associated with the fact that it would be easier for labour inspectorates and competent authorities to detect cases of problematic traineeships. In addition, in the long term, enforcement costs could decline as the prevalence of problematic traineeships would decrease over time. To the extent that problematic traineeships are substituted with regular employment contracts, the social security contributions paid by employers and workers could have a positive impact on social security revenues.

### 6.1.4 Common impacts on Fundamental Rights of measures under Policy Area 1

Since they combat problematic traineeships, the initiatives under Policy Area 1 support the right to fair working conditions (Article 31 of the EU Charter of Fundamental Rights), contribute to adaptable employment (principle 5 of the European Pillar of Social Rights) and equal opportunities (principle 3 of the European Pillar of Social Rights).

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<sup>220</sup> For instance, in ES cases of fraudulent practices are evident in the media sector. In the UK, abusive practices are common in politics, fashion, creative industry and journalism. In AT, high-paying sectors such as banking or finance have a large number of unpaid trainees (see Eurofound (2016). Exploring the fraudulent contracting of work in the European Union, Eurofound, Dublin.). See also Section 2.3.1.1 for a brief discussion of problematic traineeships and economic sectors.

### 6.1.5 Measures to determine problematic traineeships.

These measures include two initiatives (1.1.1. and 1.1.2) providing a list of criteria to assess problematic traineeships, and in particular traineeships used to replace entry-level jobs. While soft legal instruments on traineeship quality are present in various MS, to the best of our knowledge, no EU country has specific guidance to detect problematic traineeships. Hence, options 1.1.1 and 1.1.2. would directly affect all EU MS.

These policy measures can be expected to prevent and combat the practice of using trainees to replace entry-level jobs, thus leading to a decline in the number of fraudulent practices. Traineeships relationships identified as fraudulent will be replaced by regular employment relationships.

The **social impacts** of these measures are associated with the decline in the number of problematic traineeships covered in the section above “Common social impacts associated with a decline in the number of problematic traineeships”.

From an economic perspective, in addition to the **economic** consequences of a decline in the number of problematic traineeships described above, the policy measures would entail one-off adjustment costs for TP to familiarise themselves with the criteria introduced by the interventions and to revise existing traineeship contracts to make them compliant with the guidelines of the new rules.

### 6.1.6 Measures to prevent problematic traineeships.

This set of policy measures focuses on the duration of traineeship contracts and the information contained in traineeships vacancies. While policy measure 1.2.1. only addresses the problem of excessively long traineeships, option 1.2.2. prevents employers from asking prior work experience to trainees. These interventions would directly affect trainees and TP in several MS. Evidence from the EC (2023a) evaluation indicates that the QFT principle on limited duration is one of the least implemented across EU countries (see also D1.4. In Section 2.5.2). AT, BG, DE, DK, ES, IE, PT would have to introduce the requirement for OMT while BG, ES, IE, IT, LU, PL, PT would have to establish it for ALMP. Importantly, since the information on the regulations of traineeship duration is missing for some countries, the actual number of MS that would have to introduce new requirements for OMT could be larger<sup>221</sup>. As far as ECT are concerned, AT, BE, EE, ES, CY, SK would have to introduce the requirement<sup>222</sup>. Due to missing information for some countries, the number of MS that would have to introduce the six months duration limit could be higher. As far as MPT are concerned, the regulation is more complex as it varies depending on the field of study, with all MS allowing traineeships longer than six months for some types of MPT.

Evidence on the number of trainees that would be affected by these interventions is uncertain due to the lack of a uniform and comprehensive dataset on the prevalence and characteristics of traineeships in the EU. To obtain an estimate, we combine data on traineeships length from the Eurobarometer 2023 Survey with the estimated number of trainees obtained from the EU-LFS for the year 2019. The approach is described in Annex 3. Considering all types of traineeships, it is estimated that **more than 350 000 individuals undertook traineeships longer than six months** in the EU27, representing 12% of the total number of trainees in the EU in 2019<sup>223</sup>. Importantly, averaging across the

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221 In Ecorys (2023) study no information was found for CY, EE, FI, FR, GR, LV, MT, SK, SL. On the other hand, BE, CZ, HR, HU, LT, LU, NL, PL, RO, SE were found to restrict the duration of OMT to six months.

222 In particular, a six-month duration limit was found in BG, FR, HU, IE, LT, LU.

223 In terms of cross-countries differences, the MS with the largest share of trainees undertaking traineeships longer than six months are PT, HR, NL, MT, CY and IE.

EU 27, the prevalence of traineeships contracts longer than six months is larger among paid trainees than among unpaid trainees. In addition, it is estimated that **more than 200 000 individuals (including paid and unpaid trainees) undertook repeated short traineeships with the same employer** that were overall longer than six months and would therefore be directly impacted by the initiative. **Overall, policy option 1.2.1. could directly affect around 370 000 trainees who are considered workers.**

Estimates on the potential number of traineeships that would be impacted by policy measure 1.2.2. are based on the number of trainees who reported having conducted multiple traineeships with different employers (based on the Eurobarometer survey). This gives a proxy measure of the number of traineeships vacancies asking prior work experience to candidates. The results suggest that **38% of the total number of trainees (corresponding to 1.1 million trainees) in the EU in 2019 conducted multiple traineeships with different employers**<sup>224</sup>.

**Table 13: Long duration and prior work experience requirements (thousands)**

	Paid OMT	Paid ALMP	Paid ECT	Unpaid OMT	Unpaid ALMP	Unpaid ECT	Paid Trainees	Unpaid Trainees	Total
Traineeships longer than six months	67 (16%)	92 (17.2%)	72 (14.3%)	17 (11.9%)	8 (10%)	100 (8.1%)	231 (16%)	125 (9%)	355 (12%)
Consecutive traineeships longer than six months	28 (7%)	57 (11%)	54 (11%)	3 (2%)	5 (6%)	61 (5%)	139 (10%)	69 (5%)	208 (7%)
Trainees who were asked prior work experience	147 (35%)	178 (33%)	167 (33%)	64 (45%)	35 (46%)	532 (43%)	491 (34%)	631 (43%)	1 166 (38%)

Note: The table shows the estimated number of paid and unpaid trainee undertaking traineeships longer than six months in absolute and percentage terms and the estimated number of paid and unpaid trainees who were asked prior work experience to start a traineeship. Data on the share of trainees in traineeships longer than six months comes from the Eurobarometer 2023 Survey. Data on the total number of paid trainees by traineeship type comes from the EU-LFS (Section 2.2.1).

Policy measure 1.2.3. mitigates the information asymmetry between employers and trainees during the application process and can be expected to produce its largest effects in those countries that have not implemented the QFT principle of transparency in the vacancy notices (see also D2.2.2. in Section 2.5.3). According to the findings of the EC (2023a) evaluation, seven MS (BG, DE, DK, ES, HR, IE, PT) are completely missing the recommended requirements on vacancy transparency for OMT and three MS (CY, EL, LT) only partially implemented it. With respect to ALMP, nine EU countries (DE, DK, ES, IE, IT, LV, SE, SI, SK) fully implemented the principle while seven implemented it only partially. A vacancy analysis conducted as part of Ecorys (2023) support study found that 42% of the OMT and 59% of the ALMP traineeship vacancies mentioned allowance and remuneration, while the fraction of vacancies indicating the actual amount was significantly lower (21% for OMT and 44% for ALMP traineeships vacancies). Existing evidence on the level of transparency of traineeship vacancies is limited and mainly focused on remuneration aspects. The survey of trainees conducted for Ecorys (2023)

<sup>224</sup> These estimates are higher than those obtained through the analysis of the vacancies available on the EURES portal conducted for this study, which found that about 20% of total traineeships vacancies require prior work experience. This discrepancy could be due to the fact that the approach based on the Eurobarometer 2023 survey is likely to overestimate the number of employers asking for prior work experience to trainees for two reasons. First, not all trainees who conducted numerous traineeships were necessarily asked for prior work experience. Secondly, in the Eurobarometer 2023 survey respondents were asked to consider all possible traineeships conducted, not only those related to the current year. This implies that the yearly number of multiple traineeships with different employers could be substantially lower.

support study found that only 21% of the participants reported having found information on remuneration/allowance in the traineeships' vacancies. While these results are uncertain, they suggest that more than half of traineeship vacancies are missing the transparency requirements and could be affected by the policy measure.

## Social Impacts

These interventions are expected to produce positive indirect impacts for trainees by contributing to improving the employability of young individuals since trainees could be offered regular employment contracts at the end of the six months traineeship contract. In addition to that, the number of problematic traineeships could decline. In our survey, a majority of national stakeholders either somewhat agreed or completely agreed that a cap on the maximum duration of traineeships can help reduce the risk that traineeships are used to replace regular employment<sup>225</sup>. Nonetheless, some employers will find it optimal to sustain the recruitment and training costs to replace trainees with new ones, instead of offering regular employment contracts. Importantly, by preventing employers from requiring prior work experience of trainees, policy option 1.2.2. could further increase the cost of hiring new trainees, since they would start with a lower initial level of competence and would thus require more training. Thus, a combination of options 1.2.1. and 1.2.2. could best improve trainees' employability. Option 1.2.2. is expected to improve traineeship accessibility for individuals without prior work experience, including those with lower skill levels. Last, option 1.2.3 can be expected to have a large impact on information gaps in traineeship vacancies, especially because it establishes further information requirements on aspects related to social protection and learning content. It can be expected to support trainees to form a clearer understanding of the prospective job requirements and benefits, and to assess how their competences would be evaluated and their skills could grow.

## Economic Impacts

Limits on traineeships duration contribute to tightly regulating this form of work and clarifying the boundaries relative to regular employment relationships. These measures contribute to preventing the problematic use of traineeships<sup>226</sup>. The expected decline in the number of problematic traineeships allows for **trainees** to enjoy better working conditions during their traineeships. In addition, the improvements in the employability of trainees discussed above enable young individuals to enjoy the benefits of higher wages and access to social security contributions.

The economic benefits for **employers** and **TP** are associated with the positive impacts from a decline in the number of problematic traineeships discussed above. In terms of costs, TP would have to sustain adjustment costs to recruit new trainees (or offer regular employment contracts) to replace those who were in the company for more than six months. Aggregating across the EU, these costs were estimated at up to EUR 67.5 million for all paid trainees using a methodology described in Annex 3. Remarkably, correlational evidence from the latest Eurobarometer Survey shows that large organisations (more than 250 employees) tend to have a higher number of traineeships longer than six months compared to SMEs, for all types of traineeships, suggesting that large companies could be more affected by interventions restricting the duration of traineeships<sup>227</sup>. In contrast, the adjustment costs to adapt to the new limits on contracts duration, including revising the

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225 65% or 13 out of 20 business associations, 65% or 13 out of 20 trade unions and 62% or 8 out of 13 youth associations/universities.

226 Eurofound (2017) Fraudulent contracting of work: Abusing traineeship status (Austria, Finland, Spain and UK), Eurofound, Dublin.

227 In particular, the differentials in the prevalence of paid traineeships longer than six months between large organisations and SMEs was of 11 percentage points (p.p.) for ALMP (26% against 15%), 10 p.p. for ECT (22% against 12%), 11 p.p. for MPT (26% against 15%) and 8 p.p. for OMT (21% against 13%). Similar results were obtained performing a linear regression analysis using country fixed effects and controlling for the type of traineeship and whether the traineeship was paid.



content of the vacancies already published and/or providing an objective reason for renewing or extending the duration of a contract are expected to be negligible. In addition, it should be noted how, under some circumstances, limits to traineeships duration could hinder employers' willingness to invest in the workforce and allow young people to acquire relevant competences<sup>228</sup>. The adjustment costs to comply with new regulations could be relatively higher for SMEs compared to larger organisations that can benefit from economies of scale. Lastly, policy option 1.2.3. would introduce recurrent costs to comply with transparency in the vacancies estimated between EUR 15 million (assuming that only some MS will implement the provision) and EUR 46 million (assuming full implementation by MS) based on the methodology described in Annex 3.

As far as **PA** are concerned, the use of a binding instrument for one or both measures would introduce enforcement costs for MS connected to transposing the provisions into the national regulatory schemes. Importantly, these costs will not be sustained (or will be sustained only partially) in those countries that have already implemented the six month limit to the duration of traineeships in their legislative frameworks (see Table 3 in Section 2.5.2).

### 6.1.7 Measures to strengthen inspections and enforcement.

Measures to strengthen inspections and enforcement are articulated in two cumulative measures, aiming at preventing and detecting problematic traineeships by addressing the problem driver connected to the weak enforcement and lack of capacity for controls and inspections (D1.2. in Section 2.5.2). Policy measure 1.3.1. ensures the actual establishment of enforcement mechanisms in light of the evidence of the EC (2023a) evaluation suggesting that such mechanisms do not exist in many countries. In particular, the study findings indicate that 10 MS (namely CZ, EE, HR, IT, LV, MT, NL, PL, FI, SE) would have to introduce monitoring and enforcement mechanisms for OMT, while such mechanisms already exist in all 27 MS for ALMP. Significantly, the legal analysis conducted for the present study found that inspections or guidance specific to trainees' situations are missing in most EU MS. Only HU, LT, LU and SK have such systems in place for all types of traineeships, DK and IE have them for ALMP, ECT and MPT, IT has them for medical MPT and PT for ALMP. Option 1.3.2. expands the capacities of labour inspectorates and competent authorities to address the fact that limited resources, costs and difficulties in detecting problematic use are among the main enabling factors of such practices<sup>229</sup>. Importantly, the impact of these policy options will largely depend on the guidelines and criteria to detect problematic traineeships.

By increasing the capacity of labour inspectorates to conduct targeted inspections to detect problematic use of traineeships, policy options 1.3.1. and 1.3.2. are expected to reduce the number of these traineeships in EU MS. Existing evidence suggests that increases in the number of proactive targeted inspections can be highly effective at detecting cases of fraudulent employment. For example, a 2012 initiative by the Swedish Tax Agency to regulate foreign self-employed drivers and the hauliers that engaged them detected over 300 falsely self-employed foreign drivers within months<sup>230</sup>. Similarly, in IE joint investigations involving Revenue Commissioners and the Department of Social Protection detected almost 200 cases of bogus self-employment in the construction sector in 2014-2015. In FR in 2020, out of 107 490 controls from labour inspectors (on all aspects of labour law, not just related to traineeships), 10 penalties were addressed for

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228 This was the view of youth organisations, trade unions, PES in BE, EL, IT and ES in the EC (2023a) evaluation.

229 Eurofound (2016). Exploring the fraudulent contracting of work in the European Union, Eurofound, Dublin.

230 Thörnquist, Annette. (2013). False (Bogus) Self-Employment in East-West Labour Migration: Recent trends in the Swedish construction and road haulage industries.

problematic traineeships<sup>231</sup>, a stable figure with 8 penalties for problematic traineeships in 2019 and 9 in 2018<sup>232</sup>.

In addition to the immediate identification of problematic traineeships, the deterrence effect of these initiatives, connected to the perceived or actual increase in the likelihood of detection, is expected to lead to a long-term decline in the number of problematic traineeships<sup>233</sup>.

### Social impacts

See Section 6.1.2 on the common social impacts of a decline in the number of problematic traineeships.

### Economic impacts

From the perspective of **TP**, organisations offering problematic traineeships can be expected to sustain adjustment costs to ensure that traineeships are compliant with the new provisions. These costs could be larger for SMEs since they could face larger capacity constraints and cannot take advantage of the benefits of economies of scale as much as larger companies.

To the extent to which these initiatives can be effective in reducing the number of non-compliant traineeships and/or misuse of traineeships, enforcement costs for **PA** could decline in the longer term. In addition, the reinforced capacity of labour inspectorates in terms of technical, human and financial resources could increase their effectiveness in monitoring and enforcement procedures. Further monetary revenues could be generated by the fines issued by the competent authorities. While these revenues cannot be predicted ex-ante, existing evidence suggest that in some cases they could be substantial. For instance, a special team from the Netherland National Labour Authority (Inspectorate SZW) collected a total of EUR 2.2 million from issuing 60 fines for cases of false self-employment after an inspection of 230 employers. In terms of costs, all the policy measures could entail higher enforcement costs for labour inspectorates and competent authorities in charge of monitoring and enforcement practices. The magnitude of these costs would largely depend on the adjustments required to the current systems. In particular, we consider three scenarios of costs described in the table below. The first low bound scenario is based on the assumption that no new inspectors are hired and the only additional costs are connected to providing additional traineeship-specific training. The high bound scenario depicts a situation in which new labour inspectors are hired. In particular, the optimal number of new inspectors to be hired is obtained by applying the optimal ratio inspectors/employees recommended by the ILO to the number of trainees in each country, taking into account the existing capacity of the National Labour Authorities. The intermediate scenario only deviates from the second scenario by assuming that only 50% of the optimal number of new inspectors will be hired. Details on the methodology used are contained in Annex 3. Our estimates suggest that enforcement costs could range from EUR 27 000 (if only additional training is provided) to EUR 1.2 million if all National Labour Authorities were to fully expand their staff.

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231 With regard to French legislation, this can relate among others to the maximum duration of six months, the ratio of trainees to employees in the establishment, the working hours and the designation of a tutor. See Article L124-17 of Education Code.

232 See annual reports of labour inspection: Direction Générale du Travail (2021). L'inspection du travail en France en 2020; Direction Générale du Travail (2020). L'inspection du travail en France en 2019; Direction Générale du Travail (2019). L'inspection du travail en France en 2018.

233 Heyes, J., & Hastings, T. (2017). The Practices of Enforcement Bodies in Detecting and Preventing Bogus Self-Employment.

**Table 14: Costs of new labour inspectors and training under three scenarios.**

Scenario	Description	Estimated total costs in the EU27 (EUR)
Low costs scenario	The number of labour inspectors in the EU MS remains unchanged and a share of current labour inspectors receives new training specifically about traineeships.	27 256
Intermediate costs scenario	New inspectors are hired by National Labour Authorities. The number of new labour inspectors is obtained using the 1 inspector per 10,000 employees ratio recommended by the ILO applied to the number of trainees in each EU MS. Only half of the new additional inspectors are assumed to be actually hired. The training costs are the same as in the low costs scenario.	791 540
High costs scenario	New inspectors are hired by National Labour Authorities. The number of new labour inspectors is obtained using the 1 inspector per 10,000 employees ratio recommended by the ILO applied to the number of trainees in each EU MS. All the additional new inspectors are assumed to be hired. The training costs are the same as in the low costs scenario.	1 160 445

### 6.1.8 Supporting measures for trainees

The last set of interventions under this policy area addresses the problem of asymmetric power between trainees and TP (see D1.3 in Section 2.5.2) by strengthening the capacity of trainees to enforce their rights and to report and complain against problematic practices. Policy measure 1.4.1. introduces creating or using existing channels for reporting malpractice and poor traineeship conditions during and after the traineeship period. It can be combined with measure 1.4.2. which ensures the possibility for workers representatives to engage in procedures to enforce the rights of trainees. Evidence from the EC (2023a) evaluation indicates that systems for complaints and inspections are missing in 13 MS for OMT, 9 MS for ALMP, 10 MS for ECT and MPT. Trainees in a weaker position are more likely to be subject to problematic and/or poor-quality traineeships. Hence, stronger reporting mechanisms could support trainees to signal malpractice and enjoy better working conditions. Evidence from AT and ES shows that, when trainees are allowed to share any problematic use of traineeships, they tend to submit numerous entries<sup>234</sup>. In addition, these measures also have a deterrence effect for companies offering problematic traineeships.

#### Box 2: Reporting mechanisms in Austria

In AT, the Union of Salaried Employees, Graphical Workers and Journalists (GPA-djp), which represents white-collar employees and employees working under atypical contracts launched the online platform Watchlist Internship in 2014. The website allows trainees to upload information on their traineeships (in an anonymous format if preferred). In addition, it supports trainees in ascertaining the nature of the internship through a list of indicators which allows to determine the existence of a regular employment relationship. Companies reported through the website for which there is a suspicion of problematic traineeships are then referred to auditing authorities (upon agreement of the reporting person), which then carry out a joint examination (Gemeinsame Prüfung) audit. Watchlist Internship has resulted in 'hundreds of entries' (according to the GPA-djp representative) by current or former trainees.

<sup>234</sup> Eurofound (2017). Fraudulent contracting of work: abusing traineeships status, Eurofound, Dublin.

## Social impacts

The social benefits of these initiatives are connected to the detection of problematic traineeships and the decline in their supply by TP discussed under Section 6.1.5. Stakeholders interviewed agreed that strengthening channels for reporting could have benefits, including the enforcement of the existing rights of **trainees**, increasing trainees' awareness of their rights and avenues for legal action. However, youth organisations interviewed noted that the benefit of channels to report malpractices may be limited if the asymmetrical power balance between trainees and employers persists and deters trainees to report them by fear of career retaliation.

## Economic impacts

The decline in the problematic use of traineeships induced by these measures would allow trainees, employers and TP to enjoy similar economic benefits to those reported in the above sections.

In terms of costs, these policy measures would entail administrative costs for **TP** to cooperate with workers representatives and the competent PA. Organisations offering problematic traineeships could sustain an increase in costs due to a higher number of court trials and a worse reputation on the labour market.

The effect of option 1.4.2. on the administrative costs for **workers representatives** is ambiguous. On the one hand, it could increase the administrative costs connected to the enforcement of workers' rights through potential information and notification obligations. On the other hand, it could reduce the burden of enforcement procedures by making them more efficient.

From a **public sector** perspective, both policy measures can be expected to produce some enforcement costs related to conducting educational and information campaigns for trainees and/or workers' representatives on the new reporting and enforcement procedures. In the short term, the potential increase in litigation could lead to an increase in the enforcement costs for the public sector. However, these costs could decline over time insofar as these measures promote the development of quality traineeships and act as a deterrent for the supply of misused and non-compliant traineeships. In addition, by contributing to reinforcing a bottom-up monitoring system, these initiatives could ease the capacity of competent authorities to conduct examinations and combat problematic traineeships. Last, monetary revenues connected to the fines collected represent additional economic benefits.

## 6.2 Identification of impacts of measures under Policy Area 2

Policy Area 2 includes initiatives addressing the problem of poor-quality traineeships. It considers policy measures focusing on the working conditions and learning component of traineeships through provisions on fair remuneration, social protection, transparency of working conditions, and the learning element.

The policy measures under Policy Area 2 support access to better working conditions (SGD 8) by ensuring that trainees have access to fair remuneration, social protection, and transparent working conditions. In turn, access to remuneration and social protection would contribute to making traineeships more accessible to individuals from disadvantaged socio-economic backgrounds, thus contributing to reducing inequalities in the EU MS (SDG 10). Importantly, these measures are also expected to improve the

learning component of traineeships and promote the goal of lifelong learning opportunities for all (SGD 4).

### 6.2.1 Impacts under the baseline scenario

Under the baseline scenario, traineeships quality is expected to improve for trainees who are considered workers under national or EU law, while those trainees who do not classify as workers would continue to suffer from poor working conditions. Labour shortages could promote better working conditions for trainees, as they shift bargaining power and provide an opportunity to demand fairer remuneration and better training opportunities for trainees. Recent evidence based on firm-level data spanning 27 EU countries found that firms with higher labour shortages across time pay a wage growth premium to keep incumbent and attract new workers. The wage growth was more pronounced among fast-growing or labour-intensive firms<sup>235</sup>. Nonetheless, it should be noted that labour shortages should not be expected to produce similar improvements in the working conditions of trainees due to the different nature of this work arrangement. For instance, when shortages increase the pressure on workers' work life-balance, employers could hire trainees to perform administrative and repetitive tasks and reduce the work-burden on the rest of the workforce. In addition, not all companies will address labour shortages by offering higher wages and better working conditions to workers. In some sectors of the economy, shortages can push organisations to substitute labour with capital (automation), outsource or offshore part of their production process or promote remote work<sup>236</sup>. Last, despite the fact that labour market imbalances in Europe are primarily result of excess demand, surplus occupations characterized by an excess supply of labour were identified in 24 EU MS in 2022. These include both clerical occupations and professional occupations requiring third-level qualifications (especially in humanities or creative arts). These are occupations associated with sectors of the economy in which traineeships are prevalent (Section 2.2.4) and cases of problematic traineeships have been reported to be particularly common (Section 2.3.1.1 and discussion at the end of D1.3 in Section 2.5.2). Poor quality traineeships will continue to impose relevant social and economic costs.

From an economic perspective, **trainees** bear the costs of unfair remuneration levels and inadequate access to social protection. For **TP**, traineeships of poor quality might exacerbate skill mismatch by preventing the trainee from acquiring the relevant skills for the tasks, ultimately reducing productivity and the pool of potential recruits with required skills for companies (see C5 in Section 2.4.2 as well). For **PA**, a scenario of no change or increase in the number of low-quality traineeships can entail enforcement costs to ensure the application of the QFT principles in national legislation.

Poor quality traineeships reduce training opportunities for young individuals and limit their professional skills development. In addition to hindering the future employability of trainees, this also negatively impacts employers by reducing the levels of skills of young candidates (see C2 in Section 2.4.1). Importantly, the increasing need for upskilling and reskilling driven by the digital and green transitions (Section 2.5.1) could further exacerbate the negative effects of traineeships with poor learning content.

### 6.2.2 Measure on fair remuneration

If the policy option to ensure fair remuneration (2.1.1) is based on a non-binding instrument, its impacts would largely depend on the degree of implementation into the MS

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235 Groiss, M. & Sondermann, D., (2023). Help wanted: the drivers and implications of labour shortages. Working Paper Series 2863, European Central Bank.

236 Erickson, C. L., & Norlander, P. (2022). How the past of outsourcing and offshoring is the future of post-pandemic remote work: A typology, a model and a review. *Industrial Relations Journal*, 53(1), 71-89. ; WEF(2023). *Future of Jobs Report 2023*, Insight report World Economic Forum.

legislative frameworks and are difficult to predict. While the EC (2023a) evaluation found that MS have introduced legislative changes on traineeships since the introduction of the QFT, not all provisions were implemented equally and, in addition, causal links between the QFT and national policies could not be established.

A full implementation of this policy option in all MS would have a higher impact on increasing the remuneration levels of trainees considered workers in the EU and extend remuneration to unpaid trainees. At the same time, this measure could produce dis-employment effects for trainees. While no studies investigating the elasticity of traineeships with respect to the levels of remuneration exist, the literature on the employment effects of minimum wage increases suggests no major adverse effects on employment. Nonetheless, the question remains open in the academic literature, making predictions uncertain<sup>237</sup>. For traineeships, increases in remuneration levels could reduce the demand for traineeships and lead to their substitution by entry-level jobs, since the relative cost of hiring trainees compared to a regular workers would increase.

### Social impacts

Paid traineeships tend to be associated with a more structured and formalised arrangements in terms of working conditions<sup>238</sup>. Thus, **trainees** receiving fair remuneration could also benefit from better working conditions in general. Fair remuneration can also make traineeships more accessible to young people from low-income strata, who do not have the financial support to sustain unpaid work experiences. These measures could also contribute to reducing the gender pay gap among trainees. Correlational evidence from the Eurobarometer 2023 shows that only 52% of female respondents and 49% of those who did not identify with either male or female gender were paid in their last traineeship, against 65% of male participants (see also Section 2.2.4 and Annex 1.5 for evidence on gender based on the EU-LFS). Thus, these initiatives could make traineeships more accessible, improve social mobility and combat the underrepresentation of minorities in a variety of professions<sup>239</sup>. Fair remuneration could also indirectly reduce the prevalence of problematic traineeships. In our survey, a majority of national stakeholders either somewhat agreed or completely agreed that mandatory remuneration of trainees can help reduce the risk that traineeships are used to replace regular employment<sup>240</sup>. For **TP**, ensuring fair remuneration of trainees could lead to a better working environment. The associated reputational gains could further benefit employers by making them more attractive to new applicants and by increasing the retention of talent.

### Economic impacts

From the perspective of **trainees**, these interventions would guarantee direct economic benefits connected to receiving fair compensation. Estimates from a 2023 study of the European Youth Forum suggest that, on average across the EU27, the income loss associated with a 6 months unpaid traineeship amounts to EUR 7 218 (with cross-countries differences ranging from a loss of EUR 14 021 in LU to EUR 1 738 in BG)<sup>241</sup>. In addition, the study conducted by the European Youth Forum estimates that, even when

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237 Detragiache et al. (2020). A European Minimum Wage: Implications for Poverty and Macroeconomic Imbalances. IMF Working Papers. European Department.

238 Stewart, A., Owens, R., O'Higgins, N., & Hewitt, A. (Eds.). (2021). Internships, employability and the search for decent work experience. Edward Elgar Publishing.

239 Eurofound (2017), Fraudulent contracting of work: Abusing traineeship status (Austria, Finland, Spain and UK), Eurofound, Dublin.

240 86% or 12 out of 14 PA, 85% or 11 out of 13 business associations, 35% or 7 out of 20 trade unions, 85% or 11 out of 13 youth associations/universities.

241 European Youth Forum (2023). The Costs of Unpaid Internships.

they are remunerated, trainee may not be able to cover the cost of basic living expenditures in 12 MS<sup>242</sup>.

For **TP**, fair remuneration could increase trainees' productivity since it could increase effort and motivation at work<sup>243</sup>. Trainee could further enjoy more structured traineeship programmes and better overall working conditions. In addition, recent findings from the Eurobarometer 2023 suggest that trainees who received compensation are more likely to start working with the same employer under a fixed or permanent contract<sup>244</sup>. While the mechanisms behind these descriptive results are not investigated in the survey<sup>245</sup>, this evidence suggests that these policy options could increase trainees' retention rate and reduce recruitment costs for TP. In addition to directly impacting trainees' productivity, fairer working conditions can positively affect the rest of the work relations in an organisation, leading to more efficient production processes. At the same time, labour costs can be expected to increase for all TP which currently offer traineeships with unfair remuneration levels. Data on trainees' remuneration in the EU are not available. To obtain an estimate of the aggregate costs of extending fair remuneration to paid and unpaid trainees, we conduct a sensitivity analysis detailed in Annex 3. The results indicate that these costs could range from EUR 731 million to EUR 2.3 billion depending on the assumptions on the number of trainees affected (assumed to be 22% and 62% in the lower and higher costs scenarios, respectively<sup>246</sup>), the level of pay corresponding to fair remuneration (either the minimum wage or 60% of the average remuneration of employees aged less than 30 years old) and the degree of implementation of the initiative by MS (the lower costs scenario assumes that only 9 out of 27 MS will implement the recommendation; the higher costs scenario is based on the assumption that all countries will implement the provision). Importantly, since micro- and small- size companies are more likely to offer unpaid traineeships, they would have to sustain higher adjustment costs compared to medium size and large companies<sup>247</sup>. In addition to higher labour costs, TP could have to sustain adjustment costs connected to the revision of existing non-compliant contracts.

For **PA**, an increase in the number of trainees remunerated could produce a positive impact on the tax revenues and the level of social security contributions. These effects depend on two main factors. First, the national legislation on tax rates and employer and employee social security contributions rates by income group. Moreover, it is important to note that the increase in the level of remuneration could have ambiguous impacts on the employability of trainees as it could simultaneously increase the supply of trainees and reduce the demand for trainees by employers. A decline in the number of low-quality traineeships could reduce enforcement costs in the longer term. In addition, these policy measures could reduce public expenditure on last-resort safety nets (such as social assistance) by supporting the integration of young people, especially those in vulnerable situations, into the labour market. At the same time, the legislative procedures required to

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242 These calculations assume that traineeship is paid at "the annual net earnings of a single person without children earning 50% of the average earning". Details on the methodology used are contained in Annex 3 of the study.

243 This type of mechanism is supported by efficiency wages theory. See for instance, Katz, L. F. (1986). Efficiency wage theories: A partial evaluation. NBER macroeconomics annual, 1, 235-276.

244 Interestingly, the difference was larger for individuals who did ECT compared to other types of traineeships. In particular, 68% of paid ECT trainees started working with the same employer, against 40% of those who were unpaid. Similarly, 75% of those who received remuneration under a MPT started working with the same employer against 62% of those who were unpaid. In contrast, the difference was of 7 percentage points for ALMP (69% paid against 62% unpaid) and 6 percentage points for OMT (70% paid versus 64% unpaid).

245 A variety of factors contribute to explain this correlational evidence. For instance, employers are more likely to offer (fair) remuneration to trainees with higher skills level, to whom they also have a stronger incentive to offer a regular contract after the traineeship period. In addition, trainees who received compensation might be more prone to accept a job offer because they feel they have been treated with fairness and are more willing to keep working for the same employers.

246 These correspond to the fraction of trainees estimated to receive unfair remuneration.

247 The results of the Eurobarometer 2023 survey show that the proportion of paid traineeships is positively correlated with the size of the host organisation. 48% of the traineeships that occurred in micro companies (1 to 9 employees) were paid, against 54% of those offered by small companies (10 to 49 employees) and 60% of those offered by medium- and large-size organisations (more than 50 employees). The positive correlation between the prevalence of paid traineeships and the size of an organization also holds conditioning on the traineeship type.

change the current national legal framework on trainees' remuneration would entail some enforcement costs in the short term.

### Impacts on fundamental rights

The policy measure would contribute to ensuring the right to fair working conditions (Art. 31).

#### 6.2.3 Measure on access to social protection

This policy measure (2.1.2) consists of a non-binding instrument or guidance requiring that trainees have access to social protection. Being based on a non-binding instrument, the impacts of this measure will largely depend on the level of implementation of the guidance into MS' regulatory frameworks. Evidence from evaluation studies assessing the implementation of similar non-binding policy instruments raises concerns about the actual impacts that this initiative could produce. In particular, the 2023 evaluation on the Council Recommendation on the access to social protection for workers and the self-employed found that most MS were not aiming at closing existing gaps in access to social protection coverage. Thus, this measure is expected to stimulate reforms to increase trainees' access to social protection only in a subset of MS.

An estimate of the number of trainees that could potentially be affected by this intervention was computed by multiplying the share of trainees who reported not being covered by any type of social protection (in the Eurobarometer Survey) by the total number of trainees in 2019, estimated using the EU-LFS survey. Averaging across MS, **35% of the total number of trainees in Europe (corresponding to more than 1 million trainees) did not have access to social protection**. Importantly, evidence from prior studies investigating the consequences of extending access to social protection to all forms of employment suggest that these initiatives would not change the hiring behaviour of employers, and so the demand for trainees would not be affected<sup>248</sup>.

### Social impacts

This initiative could help to improve working conditions for trainees who currently do not have access to social protection. The increase in the number of trainees supported by social security schemes can be expected to reduce the precariousness of young people and their risk of poverty. Overall, the measure could make traineeship opportunities more accessible and mitigate socio-economic inequalities among young people. Access to social protection could also reduce the prevalence of problematic traineeships. In our survey, a majority of national stakeholders either somewhat agreed or completely agreed that an obligation to offer some social protection to trainees (e.g. sickness and healthcare benefits, accident insurance etc.) can help reduce the risk that traineeships are used to replace regular employment<sup>249</sup>. For **TP**, providing trainees with social protection leads to improved working relations with trainees as well as improvements in the organisation's reputation and the working environment to the extent to which employees appreciate the fair working conditions granted to trainees.

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248 In a sample of more than 600 employers, only 9% of the participants reported that they would reduce their demand for self-employed individuals if they were given access to social protection. See European Commission, Directorate-General for Employment, Social Affairs and Inclusion, Codagnone, C., Lupiáñez-Villanueva, F., Tornese, P. (2018). Behavioural study on the effects of an extension of access to social protection for people in all forms of employment, Publications Office, <https://data.europa.eu/doi/10.2767/180611>.

249 79% or 11 out of 14 public authorities, 77% or 10 out of 13 business associations, 55% or 11 out of 20 trade unions, 77% or 10 out of 13 youth associations/universities.



## Economic impacts

The economic costs and benefits for trainees and TP of extending access to social security to trainees depend on numerous factors, including the types of social benefits provided (e.g., unemployment insurance, sickness benefits, maternity and paternity benefits, benefits related to accidents and injuries), the financing schemes adopted (e.g., employer and trainees' contributions, public subsidies) and the number of trainees not covered by social protection.

For **TP**, positive indirect economic benefits could stem from the fact that trainees enjoying access to social protection could be more motivated and productive. In addition, as the reputation of the company improves, trainees could be more likely to accept potential job offers at the end of the traineeship period, potentially reducing the costs of recruitment of new workers (see also discussion in Section 6.2.2). In terms of costs, in addition to the adjustment costs associated with acquiring information on the new regulations and revising existing contracts, TP could sustain higher labour costs (in the form of social security contributions) as a result of these policy initiatives. Our estimates, detailed in the methodological Annex 3, indicate that the aggregate additional costs sustained by companies at EU level could range from EUR 2.8 billion to EUR 8.4 billion<sup>250</sup>. Importantly, these costs could disincentivise SMEs to recruit trainees, leading to a decline in the overall demand for trainees (or supply of traineeships).

For **PA**, insofar as this initiative would support the integration of young people, especially those from vulnerable socio-economic groups into the labour market, public expenditures on last resort safety nets (such as social assistance) could decrease. At the same time, PA would have to sustain enforcement costs connected to the revision of national regulatory frameworks. More importantly, this measure could lead to a substantial increase in expenditures on social security depending on the financing scheme adopted and the number of trainees who would start benefitting from the provisions.

## Impacts on fundamental rights

This policy measure would support the fundamental rights of fair working conditions (Article 31), access to adequate social protection (Article 34) and healthcare (Article 35). In addition, it contributes to the implementation of principle 12 of the European Pillar of Social Rights, which requires that all workers, regardless of their employment relationship and duration, have access to adequate social protection.

### 6.2.4 Measures to improve transparency

The options for this policy area concern requirements for employers to provide transparent information on the working conditions of trainees, in particular with respect to the types of tasks and learning content of the traineeships. Compared to measure 2.2.1. requiring written information, policy option 2.2.2. ensures stronger transparency requirements based on a written traineeship agreement. The EC (2023a) evaluation suggests that the QFT principle of providing a written traineeship agreement with information on educational objectives, working conditions, compensation, rights/obligations and duration has been implemented in 17 MS for OMT and 27 MS for ALMP. These written agreements support trainees by helping them keep track of any changes in the agreement that might occur during the traineeship.

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<sup>250</sup> The upper bound is based on the assumption that all MS will implement the Recommendation, the lower bound assumes that only 9 out of 27 MS will implement it.

## Social Impacts

Higher transparency on the learning content, remuneration and social protection of traineeships contributes to protecting **trainees'** rights to fair and just working conditions. The inclusion of information on the educational aspects and the working conditions can contribute to preventing employers from assigning menial tasks to trainees and to offer them poor working conditions. In our survey, a majority of national stakeholders either somewhat agreed or completely agreed that a written traineeship agreement stating tasks and responsibilities and arrangements for learning, mentorship, and evaluation could help reduce the risk that traineeships are used to replace regular employment<sup>251</sup>.

Nonetheless, evidence suggests that transparency requirements, including the compulsory written traineeship agreement, do not always protect trainees when the requirements are breached. In addition to the information content of the written agreement, the degree of trainee protection depends on the consequences of a breach of the conditions of the agreement and on their influence on the elaboration of the agreement. If the consequence of a breach is just the nullity of the agreement, a trainee cannot fully rely on the written conditions. Thus, the introduction of measures aimed at strengthening inspections and enforcement mechanisms as well as of supporting measures for trainees could contribute to making transparency requirements more effective at improving the quality of traineeships in the EU.

For **TP**, the transparency measures could improve the reputation of the organisation both externally and internally. In turn, the reputational gains could make the organisation more attractive to new candidates and increase the retention rate of existing trainees and employees.

## Economic Impacts

From the perspective of **trainees**, the improvements in the working conditions fostered by these transparency measures could produce economic benefits in the form of fairer remuneration and/or better access to social protection.

For **TP**, the main adjustment costs would come from providing transparent information on the working conditions and learning aspects of the traineeships. According to the impact assessment for the transparent and predictable working condition Directive<sup>252</sup>, the recurrent costs of providing each trainee with written information are estimated at EUR 44 for micro enterprises, EUR 57 for small and medium companies and EUR 25 for large companies (see estimation approach in Annex 3). By combining the results of the legal analysis conducted for this study with the estimates of the EC (2023a) evaluation, we find that the aggregate additional costs connected to introducing a written statement agreement for both paid and unpaid trainees at EU level could range from EUR 27 million (in a scenario in which the non-binding measure is implemented only by some MS) to EUR 80 million (in a scenario of full implementation from the EU MS).

One-off costs for **PA** to implement the new provisions into the national regulatory frameworks would have to be sustained. These could be limited given the evidence that the establishment of a written traineeship agreement has been included in the national regulatory frameworks of the majority of the MS for OMT and ALMP. Lastly, enforcement costs could arise from monitoring and enforcing the new obligations of traineeship providers.

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251 79% or 11 out of 14 public authorities, 77% or 10 out of 13 business associations, 70% or 14 out of 20 trade unions, 77% or 10 out of 13 youth associations/universities.

252 EC (2017). Impact Assessment for a Directive of the European Parliament and of the Council on transparent and predictable working conditions in the European Union, SWD(2017) 479 final.

## Impacts on fundamental rights

Higher transparency on the learning content, remuneration and social protection of traineeships contributes to protecting trainees' rights to fair and just working conditions (Article 31).

### 6.3 Identification of impacts of measures under Policy Area 3

The last policy area contains initiatives to improve traineeship accessibility for people in vulnerable situations, increase cross-border traineeships and promote remote/hybrid traineeships. The first measure of Policy Area 3 aims at improving traineeship accessibility to disabled and vulnerable individuals and thus, would contribute to reducing inequalities (SDG 10) and the number of people at risk of poverty and social exclusion (SDG 1). Measures promoting cross-border traineeships could contribute to ensuring full and productive employment for all (SDG 8). Similarly, policies ensuring the quality of hybrid/remote traineeships would ensure a good learning component and good working conditions of this form of work (SDG 4 and SDG 8).

#### 6.3.1 Impacts under the baseline scenario

Low levels of accessibility of traineeship opportunities to vulnerable groups impose economic and social costs on numerous stakeholders (see Section 2.4 as well). Individuals from marginalised backgrounds, including people with disabilities, will bear the costs associated with lower remuneration levels, jobs opportunities and labour market prospects. These factors have negative impacts on overall social mobility and potentially increase public expenditures on last-resort safety nets.

#### 6.3.2 Measures to improve access to traineeships for vulnerable groups

The policy measures considered include non-binding instrument or guidance to ensure traineeship accessibility for persons with disabilities (3.1.1.) and the inclusiveness of traineeships to all vulnerable groups with outreach activities (3.1.2.). Initiatives on traineeship accessibility contribute to the effective application of the principle of equal opportunities regarding employment, social protection and education of marginalised and under-represented groups stated in the European Pillar of Social Rights.

### Social impacts

These measures contribute to ensuring direct and indirect social benefits for individuals with disabilities and individuals from vulnerable socioeconomic backgrounds. **Individuals** with disabilities would enjoy the opportunity to demonstrate their work potential and the contributions they could bring to an organisation. Similarly, individuals from vulnerable groups facing difficulties in entering the labour market could obtain a way out of the "inexperience-gap" by accumulating valuable work experience. By ensuring that they can acquire work experience, these initiatives remove a key obstacle for finding employment and improve the labour market prospects of individuals from vulnerable groups. In addition, disabled people could enjoy the benefits of workplace relations, which could contribute to practicing and further developing their social skills<sup>253</sup>.

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<sup>253</sup> Making apprenticeships and workplace learning inclusive of persons with disabilities. Policy brief. 2018. International Labour Organization.

From the perspective of **TP**, recruiting individuals from vulnerable groups, including people with disabilities, would lead to a variety of indirect social benefits. To start, employers would have access to a wider pool of talent, with better opportunities to find skilled workers. In addition, they could enjoy the benefits of having a more diverse workforce, which in turn could contribute to creating a positive image of the organisation, both among staff and clients.

### Economic impacts

The economic impacts of these initiatives crucially depend on the level of implementation of the guidance into the national regulatory frameworks of the MS and the type of mechanisms designed to increase traineeship accessibility.

For trainees, measures to improve traineeship accessibility contribute to increasing traineeship opportunities for young people in vulnerable situations and increasing class mobility. Thus, these policy options allow disadvantaged individuals to acquire relevant skills, improve their productivity, enter the labour market and enhance their employment prospects. In our survey, at least half of national stakeholders who reported the existence of measures to increase accessibility of traineeships in their country believed that it increased take-up to a great or moderate extent for persons with disabilities<sup>254</sup>. Moreover, one third of public authorities and two thirds of business associations, trade unions and youth associations/universities believed such specific measures increased take up among persons with a low socioeconomic background to a great or moderate extent<sup>255</sup>. Finally, between 18% and 50% of respondents believed specific measures increased take up among persons from (ethnic, religious, sexual) minorities to a great or moderate extent<sup>256</sup>.

Benefits for **TP** could be associated with increases in productivity. In terms of costs, **TP** could face higher adjustment costs associated to conducting outreach activities towards vulnerable groups and adapting the workplace for trainees with disabilities. These costs could be larger for small companies due to their financial constraints and more limited human resources for these activities.

As far as the **PA** are concerned, in terms of benefits, insofar as these measures increase the employability of marginalised groups, they could lead to a decline of public expenditure in the last resort safety nets. One-off enforcement costs could arise from the design and implementation of specific measures to implement the guidance.

### Impacts on Fundamental Rights

By supporting traineeship accessibility to vulnerable groups, these measures would contribute to ensuring the right to equal opportunities and treatment of under-represented groups and non-discrimination (Article 21 of EU Charter of Fundamental rights). These measures contribute to delivering on the principles of equal opportunities (principle 3) and inclusion of persons with disabilities (principle 17) of the European Pillar of Social Rights.

## 6.3.3 Measures to support cross-border traineeships

Measures to support cross-border traineeships are all based on a non-binding instrument or guidance. Policy measures 3.2.1. and 3.2.2. are already contained in principles 16 and 17 of the QFT on cross-border traineeships. Hence, they constitute the baseline scenario

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254 55% (12 out of 22) of public authorities, 56% (17 out of 30) of business associations, 55% (5 out of 9) trade unions and 55% (5 out of 9) youth associations.

255 32% (7 out of 22) of public authorities, 60% (18 out of 30) of business associations, 66% (6 out of 9) of trade unions and 66% (6 out of 9) of youth associations.

256 18% (4 out of 22) of public authority, 50% (15 out of 30) of business associations, 44% (4 out of 9) of trade unions and 44% (4 out of 9) of youth associations.

for OMT and ALMP but could be extended to ECT and MPT traineeships and aim at addressing the issue of information. Measure 3.2.3. aims at addressing some of the problem drivers of the limited take-up of transnational traineeships (D3.1.2 in Section 2.5.4) by disseminating practical guidance material and information on cross-border traineeships.

Furthermore, policy measure 3.2.4. aims at promoting the application of the QFT to EU citizens conducting traineeships outside the EU. These policy measures are expected to reduce the proportion of trainees who have never undertaken a traineeship in another country, namely 78% of young people having done at least one traineeship according to the Eurobarometer 2023, by tackling the issues of information and differences in legal frameworks. The trainee survey of Ecorys (2023) support study shows that only 13% of respondents made use of the EURES portal to find a cross-border traineeship. These results suggest that EURES may still be little known or used by TP and trainees, thus policy measures 3.2.2 and 3.2.3 could affect a large number of businesses and trainees.

### Social impacts

Higher cross-border mobility of trainees could allow for better integration of the labour markets of different MS.

**Trainees** could benefit from a larger pool of traineeships opportunities, thus increasing their chances of finding traineeships aligned with their interests. In turn, this would support the development of stronger skills and allow trainees to embark on careers with better employment prospects. In addition, they could enjoy additional benefits from acquiring international experience, such as learning new languages, becoming more independent and developing strong self-esteem and more open attitudes towards other EU citizens.

**TP** would enjoy similar benefits to those described above for trainees. Thus, they would have access to a larger pool of trainees and would increase their chances of finding the right candidates for the positions advertised. In addition, a more diverse workforce could contribute to creating a more productive and stimulating working environment, and to improve the reputation of an organisation both internally and externally.

### Economic impacts

Due to their non-binding nature, the impacts of these measures are hard to predict.

**Trainees** could benefit from the positive signalling associated with having international work experience. However, they could have to sustain expenses for travelling and accommodation. These costs could be disproportionately higher for individuals with disabilities or from lower socio-economic backgrounds, thus reducing the accessibility of these types of traineeships for them. This problem could be mitigated by remote cross-border traineeships.

For **TP**, policy measure 3.2.1 would increase legal certainty, but could incur costs related to familiarisation with the taxation and social security systems for cross-border trainees. Meanwhile, measures 3.2.2 and 3.2.3 would facilitate job matching and improve productivity for businesses. While policy measures 3.2.1, 3.2.3 and 3.2.4 would not entail new costs, policy measure 3.2.2 would generate adjustment costs to post vacancies and recruit international trainees, potentially overcoming language barriers.

From the perspective of **PA**, measure 3.2.1 would entail enforcement costs to implement the provision in national legislative frameworks. Measure 3.2.3. would lead to some adjustment costs for the European Labour Authority and other competent national authorities to design and disseminate guidance and information material to potential

trainees. Measure 3.2.4. would entail adjustment costs to raise awareness of the QFT outside the EU.

## Impacts on Fundamental Rights

The provisions to facilitate cross-border traineeships contribute to promoting the freedom of movement within the EU (Article 45 of the EU Charter of Fundamental Rights).

### 6.3.4 Measure to promote remote/hybrid traineeships

The EC (2023a) evaluation pointed how the increase in remote and hybrid traineeships brought about by the pandemic, could introduce additional challenges that require adjustments to the QFT to maintain its relevance. A non-binding instrument or guidance to improve remote/hybrid traineeships would facilitate this type of work arrangements, including through measures supporting access to digital work tools (3.3). This measure could affect trainees who cannot carry out their traineeships remotely, and who represented one fifth of trainees according to Eurobarometer 2023 data. Furthermore, around 10% of trainees consider that they did not receive adequate guidance, mentoring and the necessary equipment to carry out their tasks remotely, and would thus be affected by this measure (Figure 17 and Figure 18). From a SDGs framework perspective, policies ensuring the quality of hybrid/remote traineeships would ensure a good learning component and good working conditions of this form of work (SDG 4 and SDG 8).

## Social Impacts

The measure on the quality of hybrid traineeships could ensure better working conditions for trainees in remote or hybrid traineeship programs, including better learning opportunities. Importantly, supporting access to digital work tools could contribute to making remote traineeships more accessible to young individuals with limited access to adequate ICT equipment. In addition, trainees could take advantage of remote working to consider a larger pool of opportunities in line with their skills and inspiration without having to sustain the costs of relocating. Remote forms of work could remove commuting barriers to the benefits of people with disabilities. Nonetheless, young people without basic digital skills could face difficulties with this form of work. The incidence of this problem can be expected to vary across-countries since the share of individuals with basic or above-basic digital skills is highly heterogeneous across EU MS<sup>257</sup>. Remote forms of work can also induce technology related stress and could hinder the experience of adaptation to the new role for trainees.

By providing flexibility with remote/hybrid traineeships, **TP** could improve their working relations and their reputation.

## Economic Impacts

In terms of economic benefits, **trainees** could benefit from not having to sustain the costs of relocating and the costs of commuting.

**TP** could benefit from remote work by potentially reducing their investments in offices equipment. They would sustain some adjustment costs to provide digital work tools although this has become an increasingly common practice since the pandemic.

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257 Among EU MS, HR had the highest share of individuals aged 16 to 24 with basic or above basic overall digital skills (97%), followed by EE, LT and NL (all three 93%) as well as EL (92%). By contrast, the lowest shares were observed in RO (56%), BG (58%), IT (65%), HU (68%), LV and LU (both 75%). <https://ec.europa.eu/eurostat/web/products-eurostat-news/20200715-1>.

For **PA**, one-off enforcement costs could arise from the design and implementation of measures to implement the guidance, and regular enforcement costs to monitor its implementation.

### Impacts on fundamental rights

The initiatives on remote traineeships can facilitate the right to family life (Article 7).

## 6.4 Identification of impacts of accompanying measures

All the policy options analysed in the above can be supported by various accompanying measures. The first accompanying measure 4.1 aims at ensuring the effective involvement of social partners and other relevant stakeholders in the implementation and monitoring of the rights and obligation arising from the policy intervention. Hence, it enforces principle 21 of the QFT, which promotes the active involvement of social partners in the application of the QFT. While the EC (2023a) evaluation could not assess the impacts of the involvement of social partners on the application of the QFT, evidence from numerous countries indicates that social partners contribute to improving the working conditions of trainees, both through CBA and through their involvement in discussions on regulation, policy making and monitoring. In cases in which the policy measures are based on soft legal instruments, the involvement of social partners could contribute to a more equal application of the measures across MS. In the case of binding legal instruments, the involvement of social partners could contribute to guaranteeing the effective implementation of the rights and obligations arising from the initiatives. The accompanying measure to improve monitoring and data collection on prevalence and quality of traineeships (4.2) would support the identification of problematic traineeships and enforcement actions, which would contribute to reducing the number of problematic and low-quality traineeships. Strengthening awareness raising (4.3) would improve the application of the principles and new rules for quality traineeships. The support to employers through financial or practical guidance (4.4) and the encouragement of using EU funds (4.5) would facilitate the application of the quality traineeships principles and rules, especially among smaller businesses.

## 7 HOW WILL ACTUAL IMPACTS BE MONITORED AND EVALUATED?

Progress towards achieving the objectives of the potential new initiative will be monitored using a series of core indicators related to the objectives. The monitoring framework will be subject to further adjustment according to the final legal and implementation requirements and timeline. The initiative could be evaluated 5 years after it enters into force. To avoid introducing additional administrative burden due to the collection of data or information for the purpose of monitoring, the system should rely on established data sources as much as possible. This could rely on input from agencies such as Eurofound or CEDEFOP. Surveys such as the Eurobarometer, the Working Conditions Survey or the European Company Survey can be exploited to collect data on the proposed indicators.

**Table 15: Suggested monitoring indicators by objective**

Specific objective	Operational objective	Indicator
General monitoring data	Improve evidence on traineeship prevalence	Traineeship composition: traineeship type, sector, firm size

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

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Determine, prevent and combat the problematic use of traineeships	Limit the number of potential cases of problematic use of traineeships	Duration of traineeships
	Facilitate enforcement of legislation	Number of MS with channels to report malpractice
Improve working conditions and the training element of traineeships	Ensure fair and transparent working conditions	Share of paid trainees Share of trainees with access to social protection
	Improve learning content	Share of trainees declaring access to a mentor  % of those who report they learned professionally useful things
	Create transparency in traineeship vacancies	Transparency in tasks and conditions of vacancy notices
	Improve inclusiveness and access to traineeships	Socio-economic composition: gender, degree of urbanisation, education, age, disability, (migrant) background
Improve inclusiveness and access to high-quality traineeships	Enhance uptake of cross-border traineeships	Number of cross-border traineeships



## Annexes

### Annex 1. Additional evidence for the problem definition

This annex is organised as follows. Annex 1.1 displays the sectoral and occupational classifications used throughout the study. Annex 1.2, Annex 1.3 and Annex 1.4 present additional figures and tables on paid and unpaid traineeships, whilst Annex 1.5 discusses evidence on personal characteristics of paid trainees(hips), including results from the estimation of three separate logit models. Annex 1.6 provides descriptive statistics on traineeships obtained from the Eurobarometer 2023. Annex 1.7 and Annex 1.8 conclude this annex with evidence on, respectively, the vacancy and legal analysis.

As explained at the end of Section 2.2.1.1, any evidence at MS level derived from the EU-LFS is not included in this version of the report.

#### Annex 1.1. Industry and occupation classifications used for descriptive evidence

**Table 16: NACE classification aggregated**

categories	nace_cons_agg	NACE rev. 1 categories	NACE rev. 2 categories
1	Agriculture, forestry and fishing	- 1 Agriculture, hunting and forestry - 2 Fishing	- 1 Agriculture, forestry and fishing
2	Mining, quarrying and manufacturing	- 3 Mining and quarrying - 4 Manufacturing	- 2 Mining and quarrying - 3 Manufacturing
3	Electricity, gas, water supply and construction	- 5 Electricity, gas and water supply - 6 Construction	-4 Electricity, gas, steam and air conditioning supply - 5 Water supply, sewerage, waste management and remediation activities - 6 Construction
4	Wholesale and retail trade; repair of motor vehicles and motorcycles	- 7 Wholesale and retail trade, repair of motor vehicles, motorcycles and personal and household goods	- 7 Wholesale and retail trade; repair of motor vehicles and motorcycles
5	Accommodation	- 8 Hotels and restaurants	- 9 Accommodation and food service activities
6	Transport, storage and communication	- 9 Transport, storage and communication	- 8 Transportation and storage - 10 Information and communication
7	Financial services	- 10 Financial intermediation	- 11 Financial and insurance activities

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

categories	nace_cons_agg	NACE rev. 1 categories	NACE rev. 2 categories
8	Real estate, Professional, Administrative and support service activities	- 11 Real estate, renting and business activities	- 12 Real estate activities - 13 Professional, scientific and technical activities - 14 Administrative and support service activities
9	Public administration	- 12 Public administration and defence, compulsory social security	- 15 Public administration and defence, compulsory social security
10	Education	- 13 Education	- 16 Education
11	Health and social work	- 14 Health and social work	- 17 Human health and social work activities
12	Arts/entertainment and other	- 15 Other community, social and personal service activities - 16 Activities of households - 17 Extra-territorial organizations and bodies	- 18 Arts, entertainment and recreation - 19 Other service activities - 20 Activities of households as employers, undifferentiated goods- and services-producing activities of households for own use - 21 Activities of extraterritorial organisations and bodies

Note: Nace classification used throughout the study.

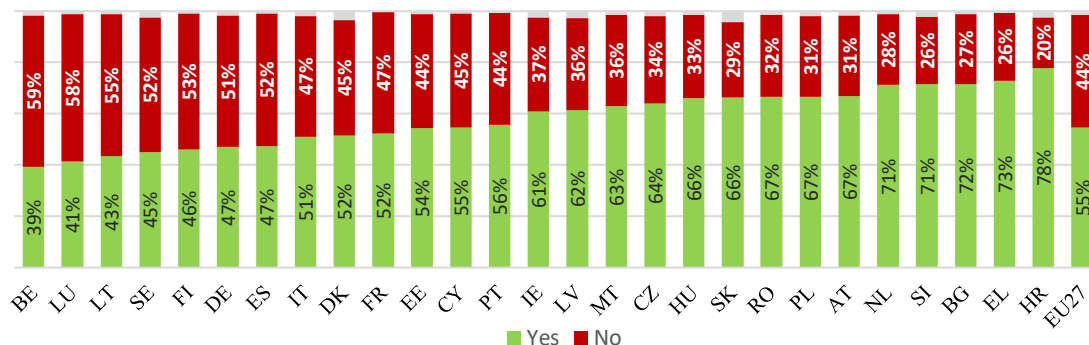
**Table 17: ISCO classification aggregated**

categories	isco_cons_agg	ISCO88/ISCO08
1	Managers and professionals	- 1 Managers - 2 Professionals
2	Technicians and associate professionals	- 3 Technicians and associate professionals
3	Clerical support workers	- 4 Clerical support workers
4	Service and sales workers	- 5 Service and sales workers
5	Skilled agricultural, craft and related trade workers	- 6 Skilled agricultural, forestry and fishery workers - 7 Craft and related trades workers
6	Plant and machine operators and assemblers	- 8 Plant and machine operators and assemblers
7	Elementary occupations	- 9 Elementary occupations

Note: ISCO classification used throughout the study.

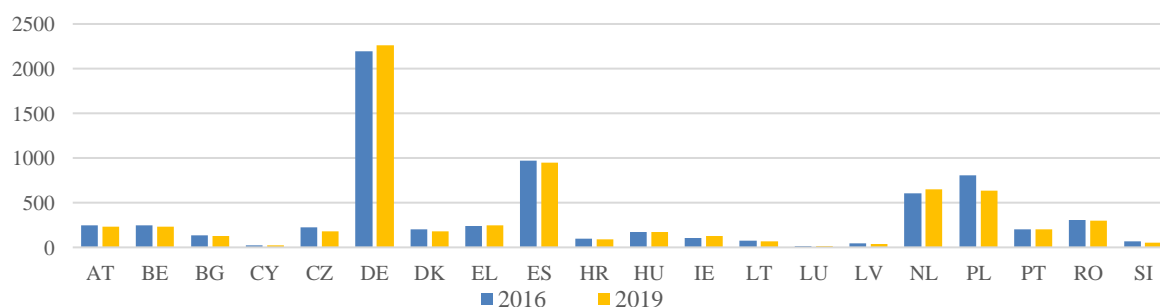
## Annex 1.2. Additional figures on unpaid trainees

Figure 25: Eurobarometer 2023 results – pay or financial compensation



Note: Eurobarometer 2023. Based on Q14: Where you paid or offered financial compensation for your last traineeship? The grey residual area corresponds to the share of “Do not know” responses.

Figure 26: Ecorys (2023) proxy - 21 MS



Note: Numbers of OMT by MS computed using the total number of student 20-29 in tertiary education and the participation rates for this age group. All quantities were obtained directly from the EU-LFS. The 6 MS not included (e.g. EE, FR) are those without OMT according to Ecorys (2023).

## Annex 1.3. Summary tables on paid and unpaid traineeships

Table 18: paid, unpaid and total number of trainees - All types - 2016 and 2019

Total - 2016-2019											
	paid			unpaid			total				
	2016	2019	% change	2016	2019	% change	2016	2019	% change	Share paid - 2016	Share paid - 2019
EU27	1488.7	1605.0	7.8	1439.6	1455.6	1.1	2928.3	3060.7	4.5	50.8	52.4

Note: Authors' computations based on EU-LFS. Numbers are expressed in thousands for the year 2016 and 2019. The column “% change” displays the percentage change between 2016 and 2019. These figures are presented for paid, unpaid and the total number of traineeships.

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

**Table 19: paid, unpaid and total number of trainees - MPT - 2016 and 2019**

MPT - 2016-2019											
	paid			unpaid			total				
	2016	2019	% change	2016	2019	% change	2016	2019	% change	Share paid - 2016	Share paid - 2019
EU27	161.8	148.9	-8.0	0	0	-	161.8	148.9	-8.0	100	100

Note: Authors' computations based on EU-LFS. Numbers of MPT are expressed in thousands for the year 2016 and 2019. The column "% change" displays the percentage change between 2016 and 2019. MPT are assumed to be always paid see Section 2.2.1.2.

**Table 20: paid, unpaid and total number of trainees - ECT - 2016 and 2019**

ECT - 2016-2019											
	paid			unpaid			total				
	2016	2019	% change	2016	2019	% change	2016	2019	% change	Share paid - 2016	Share paid - 2019
EU27	448.2	503.9	12.4	1237.3	1237.2	0.0	1685.5	1741.0	3.3	26.6	28.9

Note: Authors' computations based on EU-LFS. Numbers of ECT are expressed in thousands for the year 2016 and 2019. The column "% change" displays the percentage change between 2016 and 2019. These figures are presented for paid, unpaid and the total number of Education curriculum traineeships.

**Table 21: paid, unpaid and total number of trainees - ALMP - 2016 and 2019**

ALMP trainees - 2016-2019											
	paid			unpaid			total				
	2016	2019	% change	2016	2019	% change	2016	2019	% change	Share paid - 2016	Share paid - 2019
EU27	556.8	579.2	4.0	68.5	75.9	10.8	625.3	655.1	4.8	89.0	88.4

Note: Authors' computations based on EU-LFS. Numbers of ALMP trainees are expressed in thousands for the year 2016 and 2019. The column "% change" displays the percentage change between 2016 and 2019. These figures are presented for paid, unpaid and the total number of ALMP traineeships.

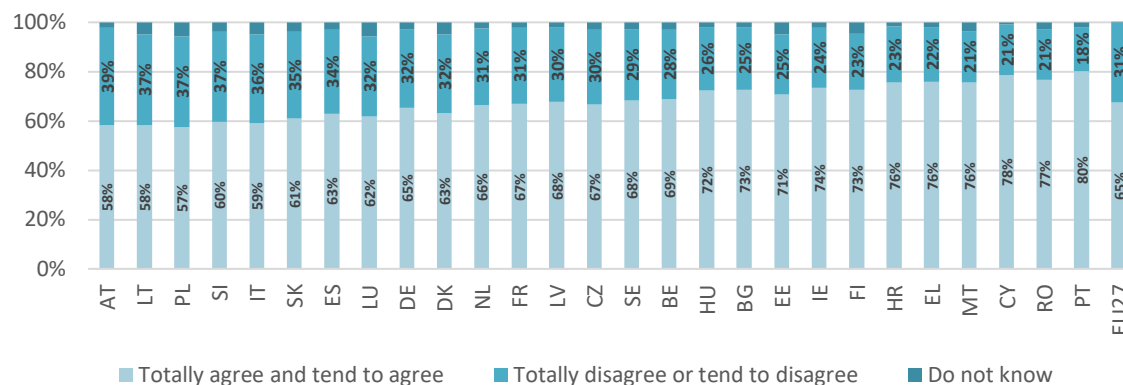
**Table 22: paid, unpaid and total number of trainees - OMT - 2016 and 2019**

OMT - 2016-2019											
	paid			unpaid			total				
	2016	2019	% change	2016	2019	% change	2016	2019	% change	Share paid - 2016	Share paid - 2019
EU27	321.9	373.1	15.9	133.8	142.6	6.5	455.7	515.7	13.2	70.6	72.4

Note: Authors' computations based on EU-LFS. Numbers of OMT are expressed in thousands for the year 2016 and 2019. The column "% change" displays the percentage change between 2016 and 2019. These figures are presented for paid, unpaid and the total number of Open Market traineeships.

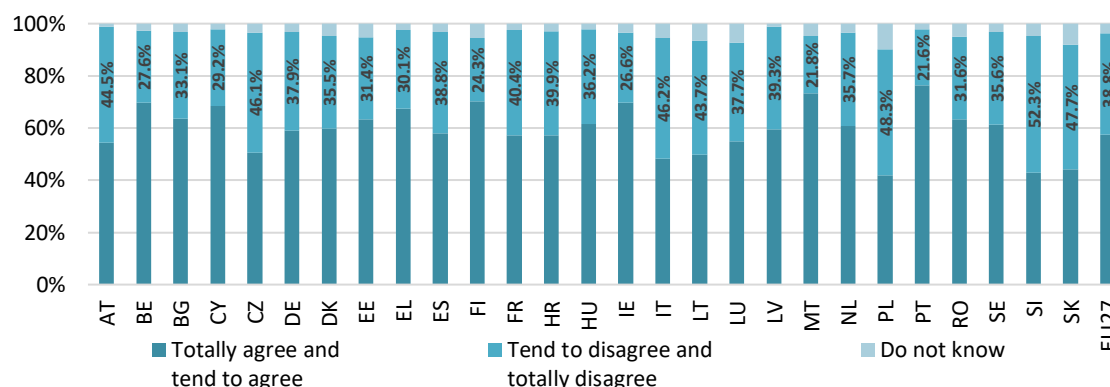
## Annex 1.4. Data on usefulness of traineeships for finding a job

Figure 27: trainees and usefulness of traineeships to find a job



Note: own elaboration based Eurobarometer 2023. The respondents who totally agreed and that tend to agree were summed up, as well as, those who totally disagree or tend to disagree.

Figure 28: Unpaid trainees and usefulness of traineeships to find a job



Note: Eurobarometer 2023. Based on Q14 & Q13\_2: "This traineeships was or will be helpful for you to find a job?"

## Annex 1.5. Detailed socio-demographic characteristics

### Annex 1.5.1 Logit specifications and estimation results

To support the analysis of socio-demographic characteristics for paid trainees, we estimate three different logit models corresponding to different reference groups, namely apprentices, recent employees (i.e. employees with tenure smaller or equal to six months)<sup>258</sup> and NEET individuals aged 15-34. These three reference groups can provide relevant information to identify distinctive characteristics of paid trainees.

<sup>258</sup> Recent employees are used instead of the entire population of employees given that that employees with long tenure can be argued to be very different (in terms of e.g. personal characteristics) from trainees. This also reduces the number of 0 values for the dependent variable since trainees only represent close to 1% of the total employee population (see for instance Figure 4 on prevalence rates).

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

The logit specification is quite standard and models the probability of being trainee given a set of k explanatory variables:

$$P(Y = 1 | x_1, \dots, x_k) = \frac{e^{\sum_k x_k \beta_k}}{1 + e^{\sum_k x_k \beta_k}}$$

The set of explanatory variables includes most of the imputed variables displayed in Table 40 and can be divided in three main groups:

1. Personal characteristics including citizenship, the student status and education level, the degree of urbanisation, sex and age.
2. Working conditions variables corresponding to the duration of the temporary contract (only relevant when apprentices are used as reference group), the full-time status, the usual hours worked and overtime, homeworking and atypical working conditions
3. Nace sectors, ISCO occupations and size of firms.

Groups 2 and 3 are not relevant for NEET individuals since they are not employed and these variables cannot be collected for this group. In addition to the three groups of variables listed above, the set of covariates includes country and year indicator variables, and the MS level youth (15-24) unemployment rates and stock of tertiary students. All variables in groups 1, 2 and 3 are categorical and the reference category for each variables is generally selected to be the most prevalent one in the sample.

Estimation results are obtained by estimating logit models for each imputed sample M (i.e. 50 times, see Annex 3) and results are combined using Rubin's rule (StataCorp, 2023)<sup>259</sup>. Table 23 displays results for each of the groups of variables defined above. Note that the current estimates displayed in Table 23 are based on the imputed data from the second to last iteration of the missing value imputation procedure (see Figure 53 and Annex 3).

**Table 23: Logit estimation results**

	Apprentice	Recent Employees	NEET 15-34
<u>Personal characteristics</u>			
<u>citizenship</u>			
National/native		Reference category	
EU28/EU27_2020	0.70‡	0.81‡	0.57*
EU outside EU28/EU27_2020 + NA/Oce	0.71*	0.90*	0.44
North Afr./NME/SE Asia/ Latin America	0.75‡	1.03‡	0.43
<u>student status</u>			
No		Reference category	
Yes	0.60‡	2.03‡	-
<u>degree of urbanisation</u>			
Cities		Reference category	
Towns/suburbs	0.92	0.94	0.86
Rural area	0.89	0.97	0.79‡
<u>education level</u>			
Low		Reference category	
Medium	2.95‡	1.81‡	3.14‡
High	6.00‡	2.03‡	11.57‡
<u>sex</u>			
Male		Reference category	
Female	0.87‡	0.92*	0.67‡
<u>age groups</u>			
15-19		Reference category	
20-24	0.94	1.20*	0.78
25-29	1.41‡	1.09	0.37‡
30-34	1.42*	0.55‡	0.12‡

259 StataCorp (2023). STATA Multiple-Imputation reference manual release 18, CollegeStation, TX: StataCorp LLC.

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

	35-64	1.17	0.26†	-
<u>Working conditions</u>				
	<u>Contract duration</u>			
	Less than 3 months	1.56‡	-	-
	3 to 6	2.19†	-	-
	6 to 12	Reference category	-	-
	12 to 24	0.25†	-	-
	24 months or more	0.07†	-	-
	<u>Part time status</u>			
	No	Reference category		-
	Yes	2.24†	1.53†	-
	<u>Usual hours</u>			
	]0-20]	1.17	0.49†	-
	]20-30]	1.00	0.67‡	-
	]30-40]	Reference category		-
	More than 40	1.17*	1.05	-
	<u>Overtime hours</u>			
	None	Reference category		-
	Less than or equal to 5	0.98	0.86‡	-
	More than 5	1.03	1.06	-
	<u>Homework</u>			
	Never	Reference category		-
	Sometimes/main work place	1.31†	1.52‡	-
	<u>Atypical working condition (1)</u>			
	Never	Reference category		-
	Shift/Night/Sunday	1.08	1.02	-
	<u>Atypical working condition (2)</u>			
	Never	Reference category		-
	Evening/Saturday	1.19‡	0.94	-
<u>Job characteristics</u>				
	<u>Nace sectors</u>			
	Agriculture/Fishing	0.92	0.52‡	-
	Mining/Quarrying/Manufacturing	Reference category		-
	Elec./Gas/Water supply/sewerage and Construction.	0.88	0.85†	-
	Wholesale/retail trade and repair	0.61†	0.80‡	-
	Accommodation	0.52†	0.54†	-
	Transport/storage and communication and information	0.87	0.84†	-
	Financial activities	1.35	1.02	-
	Real estate/Professionals/Admin. and support	1.27*	1.08	-
	Public administration	2.86†	2.46†	-
	Education	2.00†	1.85‡	-
	Human health	1.15	1.48†	-
	Arts/entertainment and other services	1.07	0.86	-
	<u>ISCO occupations</u>			
	Managers/Prof.	2.00†	1.49†	-
	Technicians/Associate prof.	0.65†	0.85	-
	Clerical support	0.67†	0.93	-
	Service and sales	Reference category		-
	Skilled agri./Craft and related	0.46†	0.82	-
	Plant/machine operators/Assemblers	0.95	0.82*	-
	Elementary occupations	1.85†	0.81*	-
	<u>Size firm</u>			
	10 or less	0.88	0.94	-
	10-49	Reference category		-
	More than 50	1.40†	1.24†	-

† p<0.01, ‡ p<0.05, \* p<0.1

Note: Coefficients are odd ratios. Results for country and year indicator variables as well as the youth unemployment rate and the stock of tertiary student are not reported in the tables. Standard errors are clustered at the country level. See Table 40 for additional information on the variables.

## Annex 1.5.2 Gender

The evidence on gender and traineeships<sup>260</sup> (EC, 2012; EC, 2023a; Flash Eurobarometer 2013 and 2023) suggests that traineeships are undertaken more frequently by women. Prevalence rates obtained from the EU-LFS for paid traineeships confirm this fact (panel a

<sup>260</sup> This evidence applies to all traineeships, not necessarily paid ones.

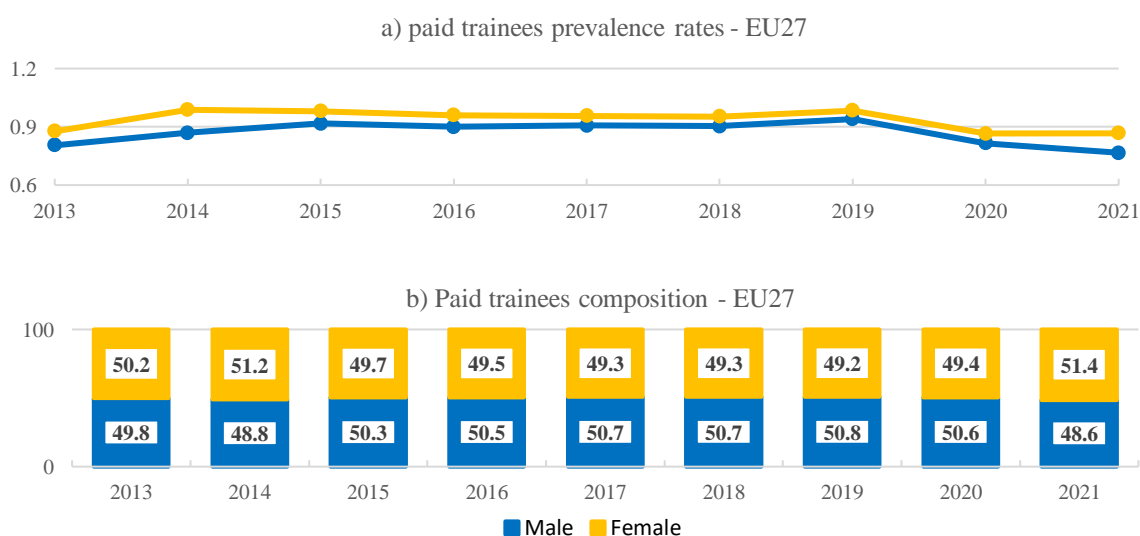
in Figure 29), as prevalence rates are systematically higher among women compared to men (respectively 0.98% and 0.94% in 2019). This gap appears to have decreased since the 2008 financial crisis (respectively, 0.99% and 0.87% in 2006)<sup>261</sup>.

However, considering the composition of the paid trainee population at EU level (panel b of Figure 29) gender differences are less pronounced, and men in fact narrowly make up more than 50% of the paid trainee population since 2015<sup>262</sup>.

By type of traineeships, Figure 30 shows that the gender composition of MPT and OMT leans towards women and is systematically above 60% and 50% for MPT and OMT since 2013 – 61% and 52% respectively in 2019. On the other hand, men represent the majority of ALMP trainees (55% in 2019), whereas ECT are more gender balanced (51% men in 2019). These differences could be explained by gender sectoral segregation. A large proportion of MPT take place in female-dominated sectors such as healthcare or education, whereas ALMP traineeships often take place in industrial sectors that are more likely to be male-dominated.

Finally, it is important to note that descriptive evidence on gender and (paid) traineeships could be misleading. The gender distribution of trainees may be driven by other underlying factors (EC, 2012), including sectoral segregation or the average higher education level of women. Results from the econometric analysis (Table 23) tend to support this observation, when the reference group is apprentices or NEET. The relation between gender sectoral segregation and paid traineeships is analysed further below in this section.

**Figure 29: Paid trainees in the EU27, by gender**



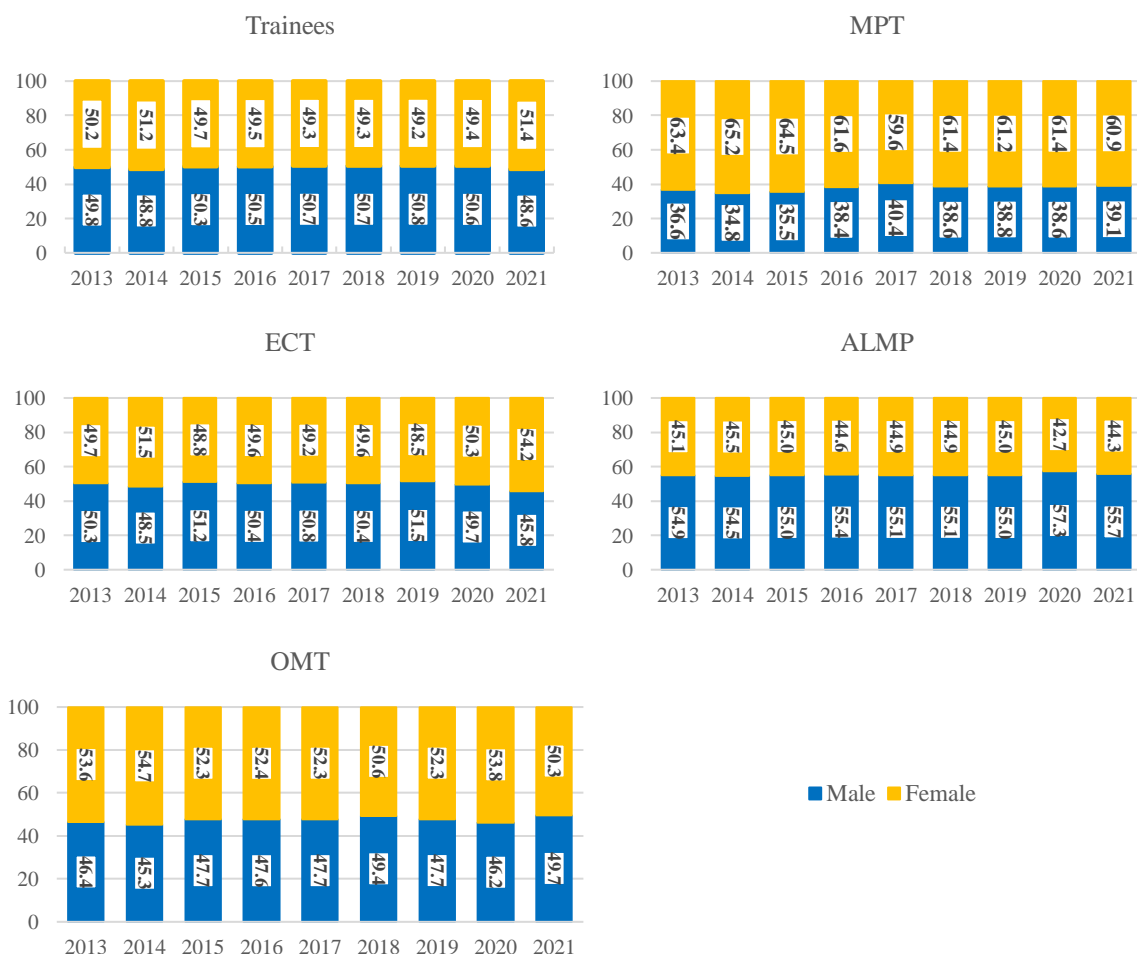
Note: Authors' elaboration based on EU-LFS. Prevalence rates are calculated as paid trainees divided by stocks of employees aged 15-64 of the relevant gender. Results are displayed in percentages. Panel b shows the gender composition for paid trainees.

<sup>261</sup> Data before 2013 is not included in the figures but time series are available from 2006.

<sup>262</sup> The difference between prevalence rates (greater for women) and the composition of the stock of trainees (close to evenly distributed across gender) reflects the lower labour market participation rate of women in the EU.



Figure 30: Gender composition of trainees by type of traineeship in the EU27



Note: Authors' elaboration based on EU-LFS.

### Annex 1.5.3 Age

Figure 31 shows the prevalence rates of paid traineeships in the EU27 by age group. The prevalence of paid traineeships is highest among the young (5.1% for the age group 15-19, and 5.5% for the age group 20-24, in 2019). Prevalence rates decrease with age. Trainees represent respectively, 2.6%, 0.8%, and 0.2% of the employee population aged 25-29, 30-34 and 35 and above.

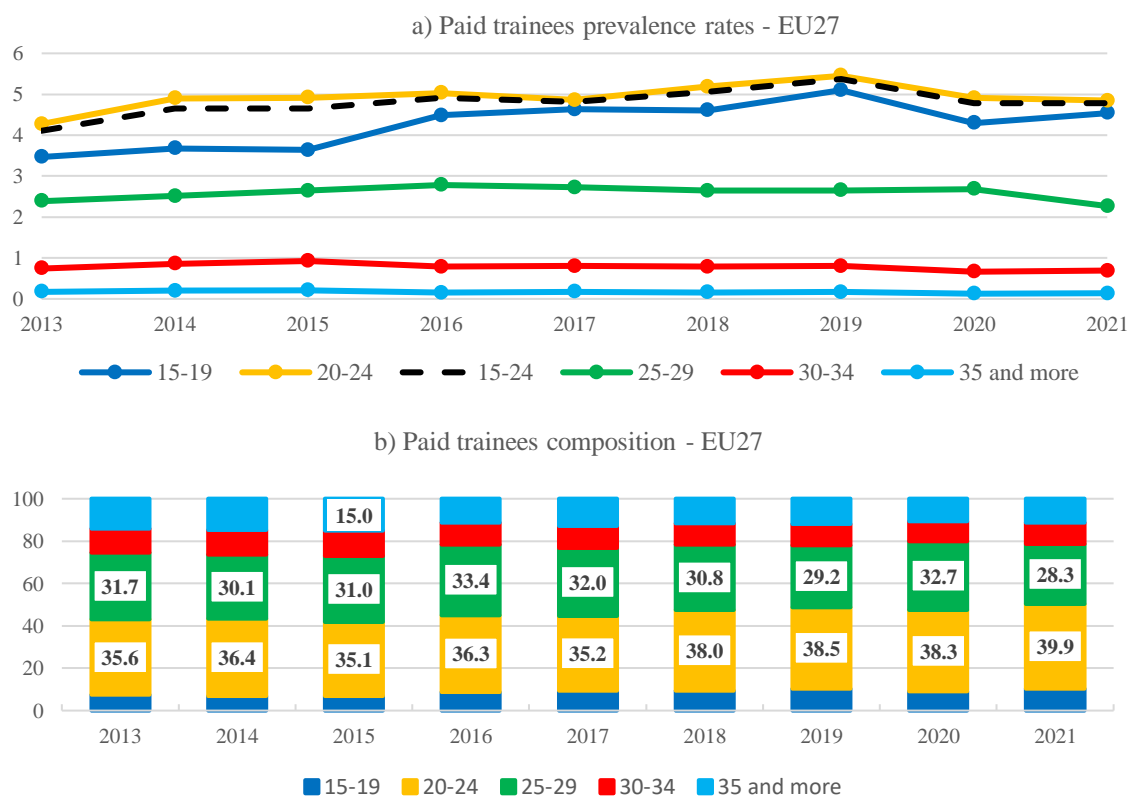
These observations are partly driven by differences in labour market participation rates of these age groups<sup>263</sup>. This is particularly true for age groups above 29 years old, which, despite low prevalence rates, still represent more than 1 in 5 trainees at EU27 level (21.9% in 2019<sup>264</sup>, panel b in Figure 31). Nevertheless, trainees aged 20-24 make up the largest share of trainees (38.4% in 2019), followed by trainees aged 25-29 (29.3% in 2019). Trainees aged 15-19 represent 10.2% of paid trainees in 2019, but their share has been increasing since 2013 (8.2%), while the share of trainees aged 30 and older decreased (25.4% in 2013).

<sup>263</sup> For the period 2016-19 at EU27 level, age groups 15-19 and 20-24 represent 1.9% and 6.8% respectively, of the employee population (68.5% for the age group 35 and more).

<sup>264</sup> 9.9% for age group 30-34 and 12.0% for individuals aged 35 and more.

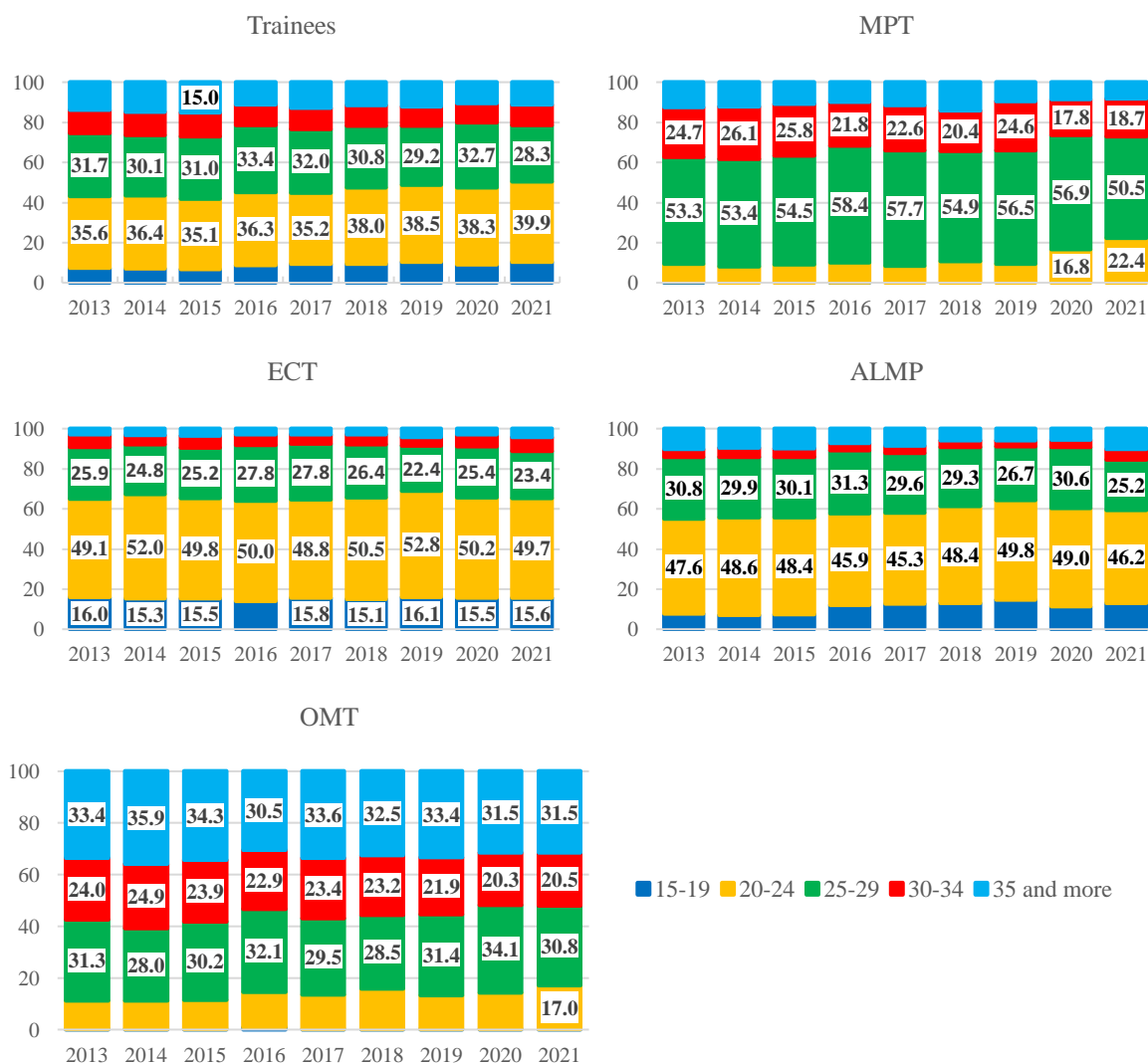
Finally, the age composition of paid traineeships by type (Figure 32) shows that the youngest age group, 15-19, is only found in ECT and ALMP traineeships. Trainees aged 20-24 make up the largest share of these two types (52.8% and 49.8% respectively in 2019), while trainees above 24 represent a large majority of MPT and OMT (around 90% for MPT and between 84% and 89% for OMT).

Figure 31: Paid trainees in the EU27, disaggregated by age



Note: Authors' elaboration based on EU-LFS. Prevalence rates are calculated as the sum of paid trainees divided by the stock of employees of the relevant age group. Results are displayed in percentages. Panel b on composition shows the share of each age group among paid trainees. Percentages below 15% are not displayed in panel b.

Figure 32: Age composition of trainees by type of traineeship in the EU27



Note: Authors' elaboration based on EU-LFS

## Annex 1.5.4 Education

Figure 33 and Figure 34 summarise information on paid traineeships by highest level of education completed<sup>265</sup> (henceforth, 'level of education'). The upper panel of Figure 33 shows that prevalence rates increase with the level of education (respectively, 0.7%, 1.0% and 1.1% for low, medium, and high levels of education).

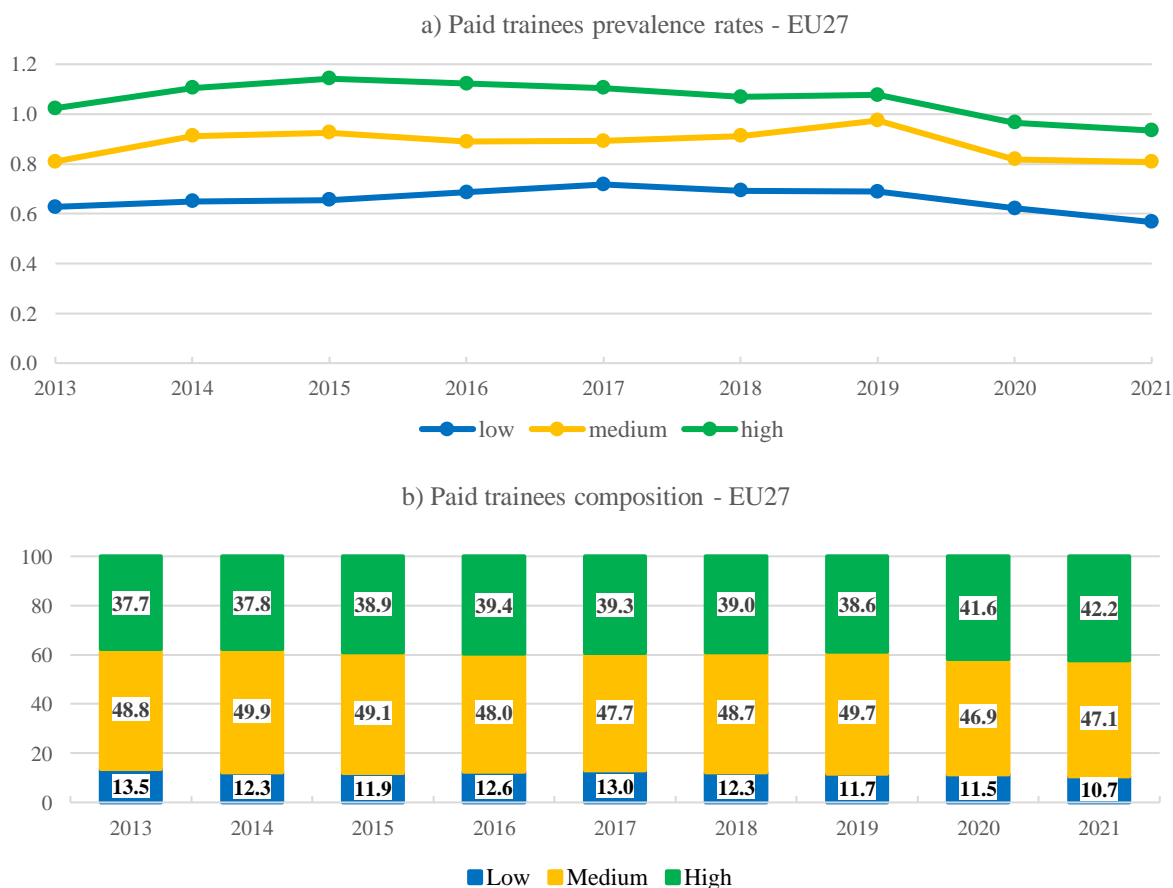
Looking at the composition of the trainee population in Figure 33 panel b, individuals with a low level of education account for a small share of paid trainees and the share has been decreasing since 2013 from 13.5 to 11.7% in 2019. The largest share of trainees has completed a medium level of education, followed by those with a high level (respectively 49.7% and 38.6% in 2019).

<sup>265</sup> Education is classified into three levels: Low corresponds to less than primary, primary and lower secondary education; Medium to upper secondary and post-secondary non-tertiary education; High includes first and second stage of tertiary education (levels 5 and 6), short-cycle tertiary, bachelor or equivalent, master or equivalent and doctoral or equivalent (levels 5-8). Results by level of education should be interpreted with care, in particular for individuals currently in education (e.g. ECT), since the level education refers to the highest level completed and not the current level.

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

Figure 34 displays the distribution of trainees by level of education and by type of traineeships. Highly educated trainees represent the largest share of MPT<sup>266</sup> and OMT (65.9% in 2019). In contrast, highly educated trainees are least likely to participate in ALMP traineeships, where most trainees have a medium level of education (73.5% in 2019).

**Figure 33: Paid trainees in the EU27, disaggregated by level of education**



Note: Authors' elaboration based on EU-LFS. Prevalence rates are calculated as the sum of paid trainees divided by the stock of employees of the relevant education level group. Results are displayed in percentages. Panel b on composition shows the share of each education level among paid trainees. Percentages below 15% are not displayed in panel b.

<sup>266</sup> For MPT, highly educated individuals represent 100% of the trainees by construction (see Annex 3).

Figure 34: Educational composition of trainees by type of traineeship in the EU27



Note: authors' elaboration based on EU-LFS. Percentages below 15% are not displayed.

## Annex 1.5.5 Citizenship

Panel a in Figure 35 shows that prevalence rates are highest among foreign citizens<sup>267</sup> from countries other than MS, followed by nationals and MS nationals (respectively 1.0%, 0.8% and 0.6% in 2019). Interestingly, the rate for trainees outside the EU has been rising from 2015, which could be linked to the refugee crisis happening over this period. The prevalence rate for MS nationals can seem low given programs promoting cross-border traineeships (e.g. Erasmus +), but it is important to keep in mind that the EU-LFS is likely to underestimate the number of cross-border traineeships<sup>268</sup>. Panel b on the composition of paid traineeships at EU27 shows that more than 9 in 10 paid trainees are nationals. Consistent with the previous evidence, the share of paid trainees from non-MS countries has also been increasing since 2015 and has remained above 5% since 2017 (5.3% in 2019). The share of paid trainees from MS lies below 3% throughout the period 2013-

<sup>267</sup> Data on citizenship is classified into three categories: Nationals or natives, EU28/EU27\_2020 for MS nationals, and "Rest" for all other nationalities.

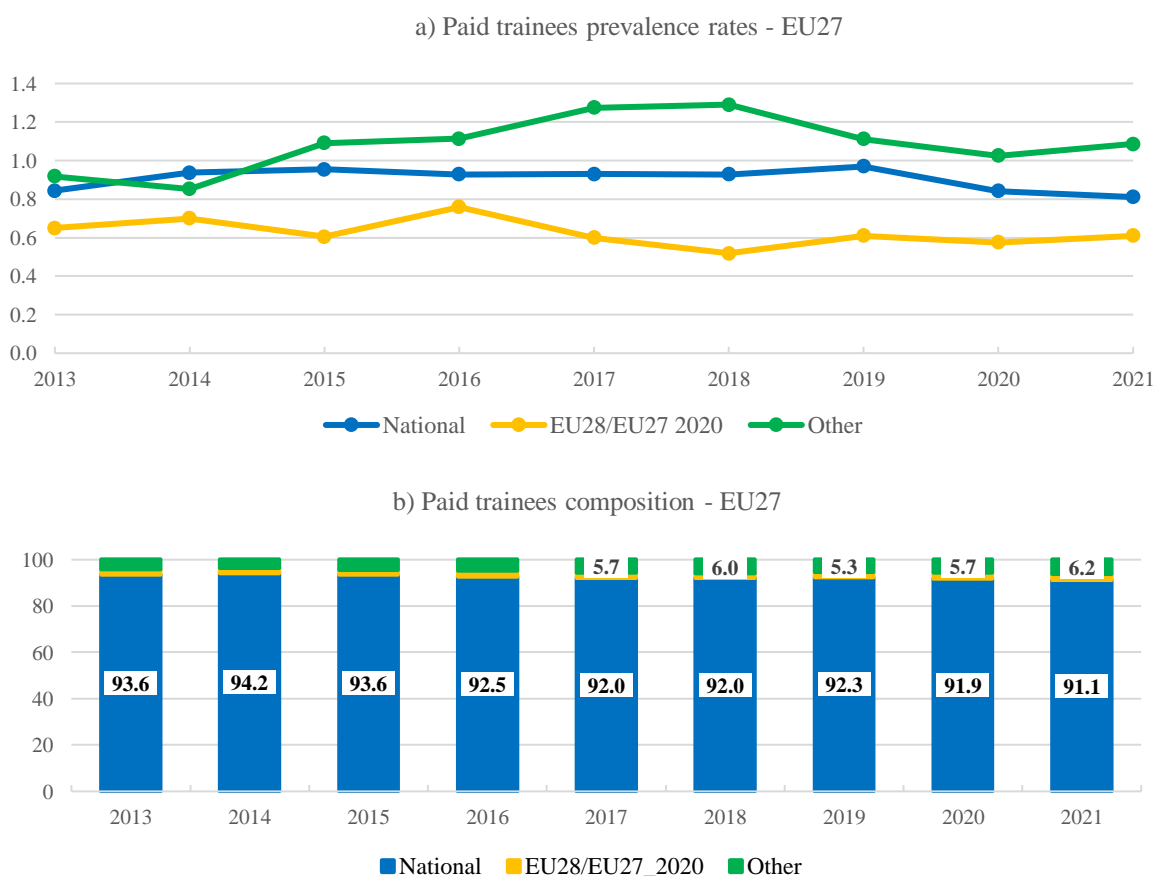
<sup>268</sup> The main reason is that cross-border traineeships are usually financed through grants or scholarships, which do not qualify as pay in the EU-LFS. This does not mean that paid cross-border traineeships are not possible, but these trainees are likely to be, for the most part, recorded as unpaid (i.e. trainees recorded as inactive or unemployed).

## STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

2019. When compared with the composition for employee aged 15-64<sup>269</sup>, the share of paid trainees from MS tend to be slightly smaller than the stock of employees from other MS (3.6% for employees and 2.4% for trainees) whereas the opposite holds for citizens from countries other than MS (4.2% and 5.4%). This suggest an over-representation of non-MS nationals among paid trainees (when compared to employees).

By type of traineeships, Figure 36 shows that nationals represent more than 90% of paid trainees for all type of traineeships<sup>270</sup>. The rise in the share of trainees from other nationalities after 2015, observed in Figure 35, panel b, is observed for all types of traineeships.

**Figure 35: Paid trainees in the EU27, disaggregated by citizenship**

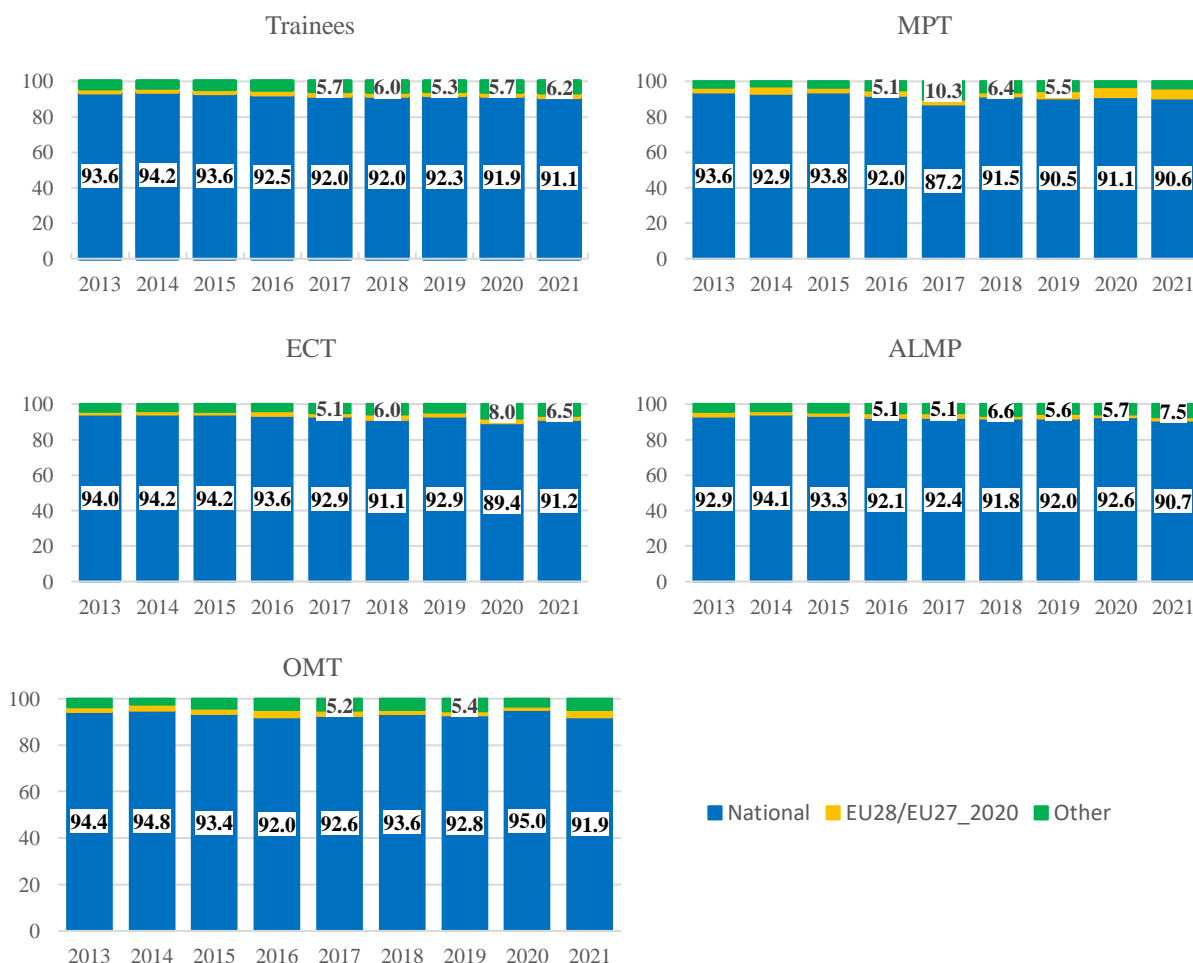


Note: Authors' elaboration based on EU-LFS. Prevalence rates are calculated as the sum of paid trainees divided by the stock of employees of the relevant citizenship. Results are displayed in percentages. Panel b on composition shows the share of each citizenship among paid trainees. Percentages below 5% are not displayed in panel b.

<sup>269</sup> At EU27 level for the period 2016-19, 92.2% of employees are nationals, 3.6% are from another MS, and 4.2% are from another country.

<sup>270</sup> The only exception is for MPT in 2017 (87.2%). Interestingly, this result can also be linked with the refugee crisis as a number of well-educated individuals (e.g. doctors) also arrived in Europe during the crisis period.

Figure 36: Trainees' composition by traineeship type and citizenship in the EU27



Note: authors' elaboration based on EU-LFS. Percentages below 5% are not displayed.

### Annex 1.5.6 Degree of urbanisation

Prevalence rates by degree of urbanisation (Figure 37, panel a) do not seem to exhibit a clear ranking over the 2013-2019 period. Nevertheless, since 2013, the prevalence rate of paid trainees who reside in cities has remained (slightly) higher (1.1% in 2019) than the prevalence rates for trainees living in less urban areas (0.9% for towns/suburbs, and 0.8% for rural areas in 2019).

The composition of paid traineeships at EU27 level (panel b, Figure 37) shows that the share of trainees tends to increase with the degree of urbanisation. A relative majority of trainees reside in cities (45.2% in 2019) and around 30% of trainees live in towns/suburbs areas (32.9% in 2019). Both shares have been rising since 2013 (+2.6 and +3.5 percentage points respectively). This implies that the share of trainees living in rural areas has decreased since 2013, from 28.0% to 21.9%.

The results on prevalence rates and composition also reflect the distribution of employees aged 15-64 at EU27 and MS levels (see Table 24). At EU27 level for the period 2016-2019, the shares of employees living in cities, towns/suburbs and rural areas were equal to 40.5%, 33.5% and 26.1% (Table 24), and the share of employees residing in rural

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

areas has decreased by 1.9 percentage points since 2013 (from 27.4% to 25.5%)<sup>271</sup>. However, the share of trainees living in cities is 4.4 percentage points larger than the share of employees (Table 24).

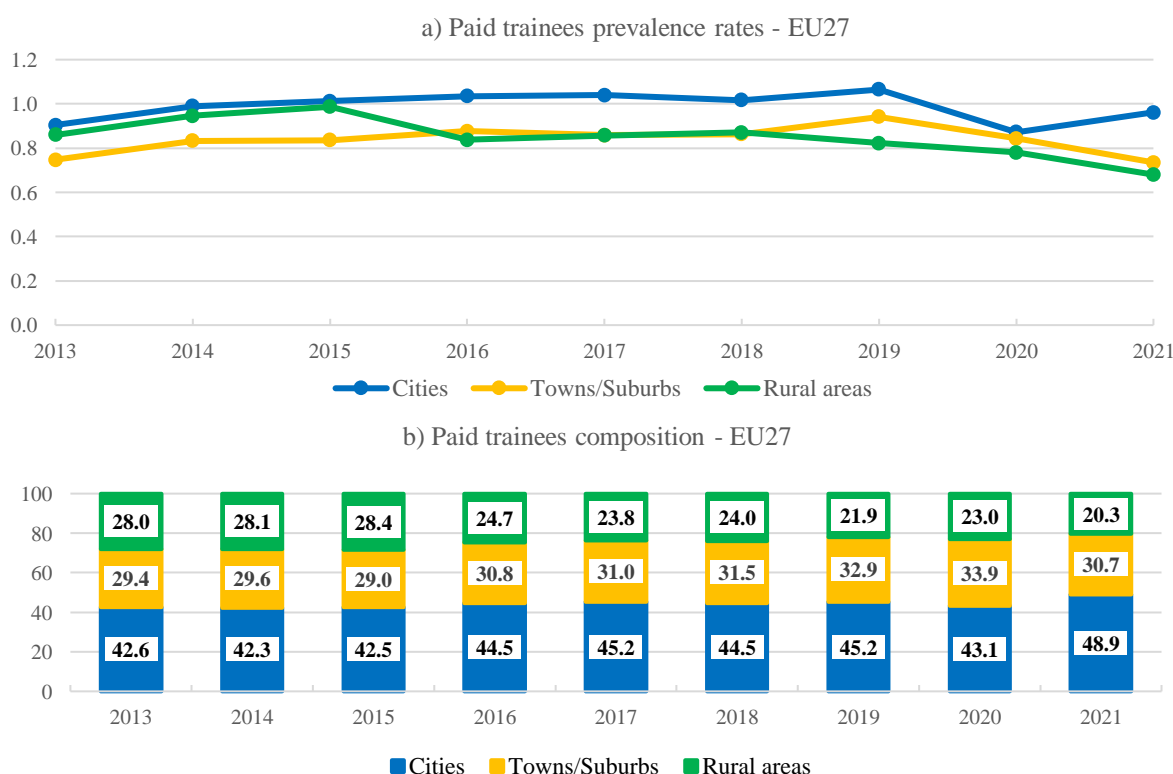
Finally, Figure 38 reveals important differences for the composition by type of traineeship. Most notably, MPT and ECT are more urban than the total trainee share, with a majority of trainees residing in cities (67.6% and 53.1% respectively in 2019) and lower shares of paid trainees from both towns/suburbs and rural areas. In contrast, a majority of ALMP trainees reside in both towns/suburbs and rural areas (40.2% and 28.1% in 2019), whilst the composition of OMT tends to be similar to the composition for total trainees.

**Table 24: Share of trainees and employees by urbanisation (2016-2019 averages)**

	Trainees			Employees 15-64			Difference		
	Cities	Towns or suburbs	Rural areas	Cities	Towns or suburbs	Rural areas	Cities	Towns or suburbs	Rural areas
EU27	44.8	31.6	23.6	40.5	33.5	26.1	4.4	-1.9	-2.5

Note: authors' elaboration based on EU-LFS. Composition by degree of urbanisation for trainees and employees aged 15-64. Data is averaged over the 2016-2019 period.

**Figure 37: Paid trainees in the EU27, disaggregated by degree of urbanisation**



Note: Authors' elaboration based on EU-LFS. Prevalence rates are calculated as the sum of paid trainees divided by the stock of employees of the relevant degree of urbanisation. Results are displayed in percentages. Panel b on composition shows the share of paid trainees by degree of urbanisation. Percentages below 5% are not displayed in panel b.

<sup>271</sup> This information is not displayed in Table 24.



Figure 38: Composition of trainees by type and degree of urbanisation in the EU27



Note: authors' elaboration based on EU-LFS.

### Annex 1.5.7 NACE sectors<sup>272</sup>

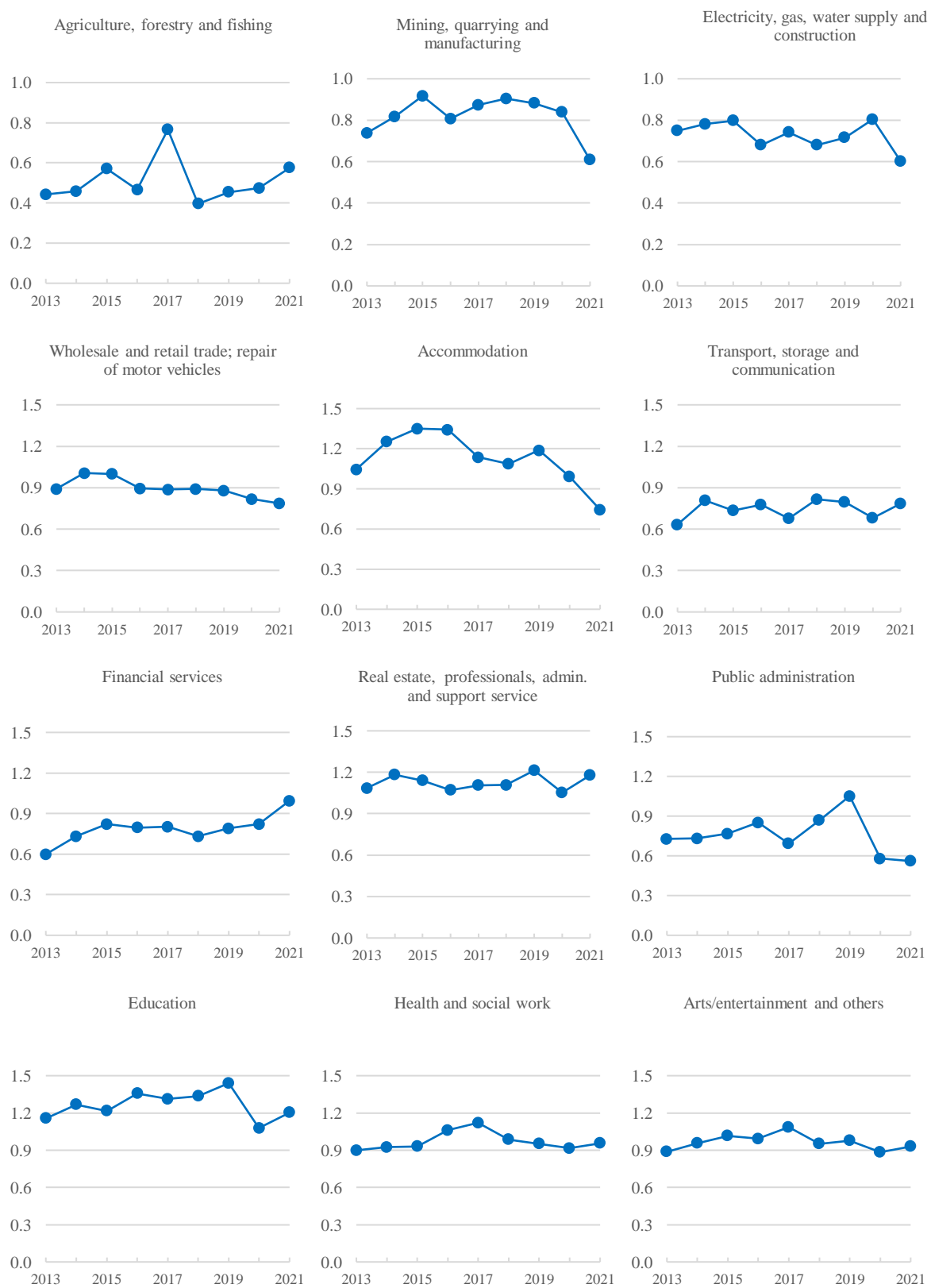
Figure 39 shows information on the prevalence rates of paid traineeships by sectors at EU27 level. The highest prevalence rates tend to be found in the service sector<sup>273</sup>, in particular, education, (1.4% in 2019), the real estate, professionals, administrative and support service activities (henceforth the 'RPASS' sector - 1.2% in 2019), accommodation (1.2%), arts/entertainment and others (1.0%), and health and social work (1.0%). Prevalence rates in industrial sectors are slightly smaller (e.g. 0.9% in the manufacturing sector, 0.7% in the electricity and construction sector in 2019).

272 1-digit Nace sectors have been aggregated in 12 sectors. See Table 16 for the precise classification.

273 The service sectors include all the sectors from wholesale and retail trade to arts/entertainment and other (groups 4 to 12 in Table 16). Manufacturing and electricity, gas, water supply and construction constitute the industry sector.

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

**Figure 39: Prevalence rates in the EU27 by sector**



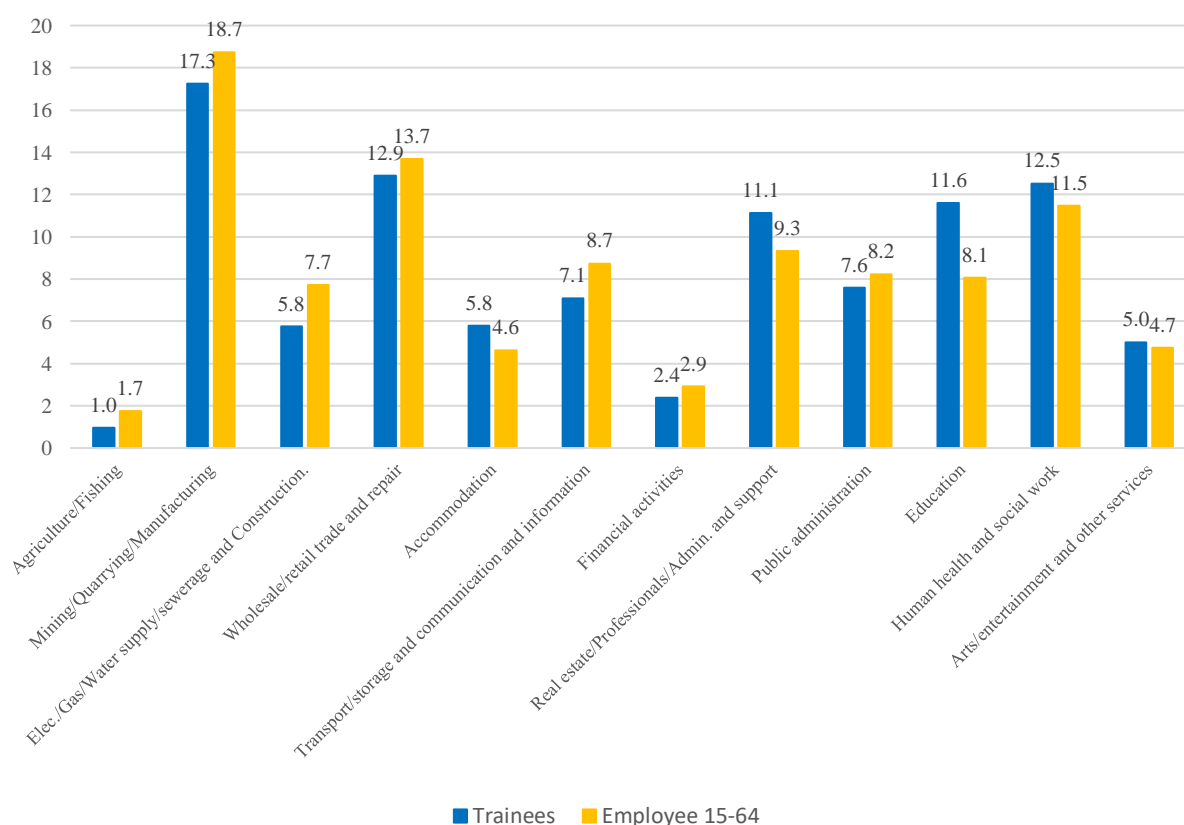
Note: Authors' estimation based on EU-LFS. Prevalence rates are defined as the number of trainees relative to the overall number of employees in the population aged 15-64. Sectors are presented as an aggregation of the NACE classification. See Table 16.

## STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

The sectoral composition of paid traineeships is shown in Figure 40. Over the period 2016-2019, the highest share of paid traineeships can be found in the manufacturing sector (17.3%), followed by the wholesale (12.9%), human health (12.5%), education (11.6%), and RPASS (11.1%) sectors. In general, these results are aligned with the sectoral shares in the overall EU27. For instance, the manufacturing sector is also the one with the largest share of employees aged 15-64 (18.7%), followed by the wholesale and retail trade sector (13.7%). It is therefore interesting to focus on the differences between the compositions for trainees and employees. The differences in composition are the largest for the education (+3.5 percentage points for traineeships), RPASS (+1.8 percentage points), accommodation (+1.2 percentage points), and health sectors (+1 percentage point)<sup>274</sup>. The corollary is that the shares of traineeships in industrial sectors tend to be smaller when compared with the overall distribution for employees.

Figure 41 shows the sectoral composition by type of traineeships. It demonstrates that MPT form a large part of traineeships in the health (41.1% in 2019) and education sectors (32.3% in 2019). Traineeships in the manufacturing and wholesale and retail trade sectors represent a high share of ALMP traineeships (respectively 22.3% and 18.9% in 2019)<sup>275</sup>. The manufacturing sector also represents a substantial share of OMT (19.6% in 2019) but less so than what is observed for ALMP traineeships. ECT appear to be more spread-out across sectors as no sectors represent more than 15% of this traineeship type in 2019.

**Figure 40: Sectoral composition for trainees and employees in the EU27**



Note: Authors' elaboration based on EU-LFS. Share of trainees and employees aged 15-64 by sectors (e.g. over the period 2016-2019, 18.7% of employees aged 15-64 worked in the manufacturing sector). Data is averaged over the 2016-2019 period.

<sup>274</sup> Exceptions are the transport (-1.6 percentage points), financial activities (-0.5 percentage point) and public sectors (-0.4 percentage point).

<sup>275</sup> Which is consistent with the sectoral prevalence of traineeships reported for IT and PL, two of the main provider of ALMP traineeships in the EU.

Figure 41: Sectoral composition of traineeships by type in the EU27



Note: Authors' elaboration based on EU-LFS. Share of traineeships by type and sectors (e.g. in 2013, 20% of ALMP traineeships took place in the manufacturing sector).

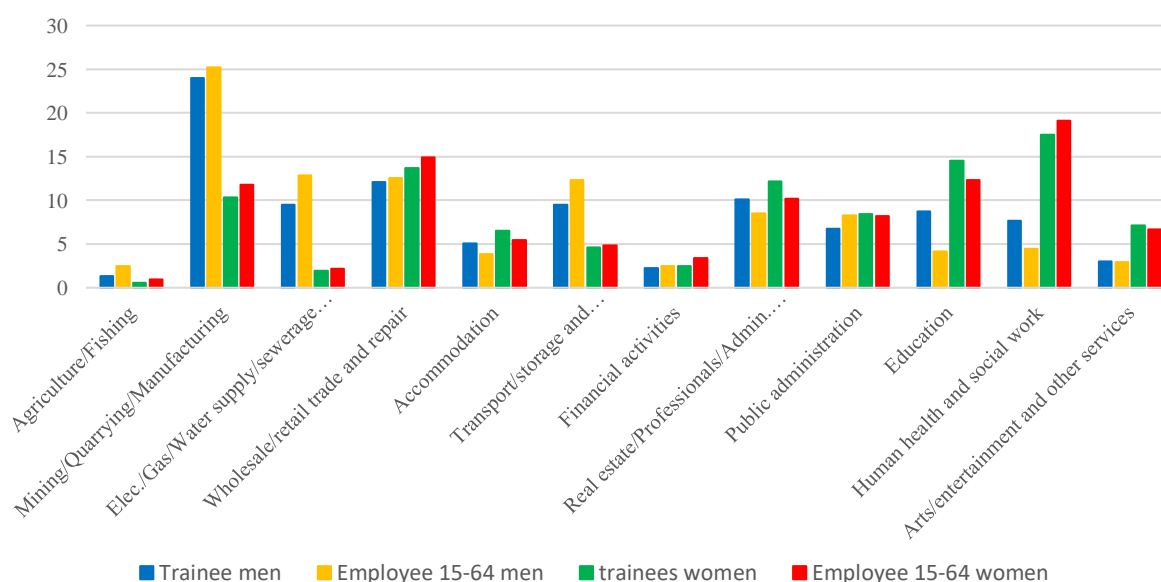
## Annex 1.5.8 Gender and sectors

Gender segregation in EU labour markets is a well-documented fact<sup>276</sup>. At sectoral level, gender segregation stands for the concentration of women' and men' employment in specific sectors. Men are typically over-represented in industrial sectors, whereas women are more likely to work in service sectors, in particular, education; health and social work; and arts, entertainment, and other services. Figure 42 confirms this evidence at EU27 level for employees aged 15-64.

Moreover, this figure reveals that the pattern of sectoral segregation observed for employees holds for trainees as well. However, the extent of segregation in certain sectors could be lower. For instance, 8.7% (14.6%) of men (women) trainees undertake a traineeship in the education sector, while 4.1% (12.3%) of men (women) employees work in this sector. Hence, the difference in shares is smaller for trainees than for employees (6.9 and 8.2 percentage points respectively).

The results on prevalence rates by sectors provide an explanation for the persistence of employees' sectoral segregation patterns to trainees. Prevalence rates are high in service sectors, such as education (1.4%), arts and entertainment, and health (1.0% in both sectors). These sectors tend to be female dominated and thus, the greater prevalence of traineeships in these sectors translate into higher numbers of women trainees. This suggests that sectoral segregation is likely to inflate the number of paid women trainees, and without segregation, their number would likely be lower. Hence, this analysis indicates that women could have lower access to paid traineeships compared to men (slightly more than 1 in 2 paid trainees are already men in 2019, see Annex 1.5.2) once the pattern of segregation is accounted for<sup>277</sup>.

**Figure 42: Gender sectoral composition for trainees and employees in the EU27**



Note: Authors' elaboration based on EU-LFS. Share of traineeships by sectors and gender (e.g. 24% of male trainees did their traineeships in the manufacturing sector). Data is averaged over the 2016-2019 period.

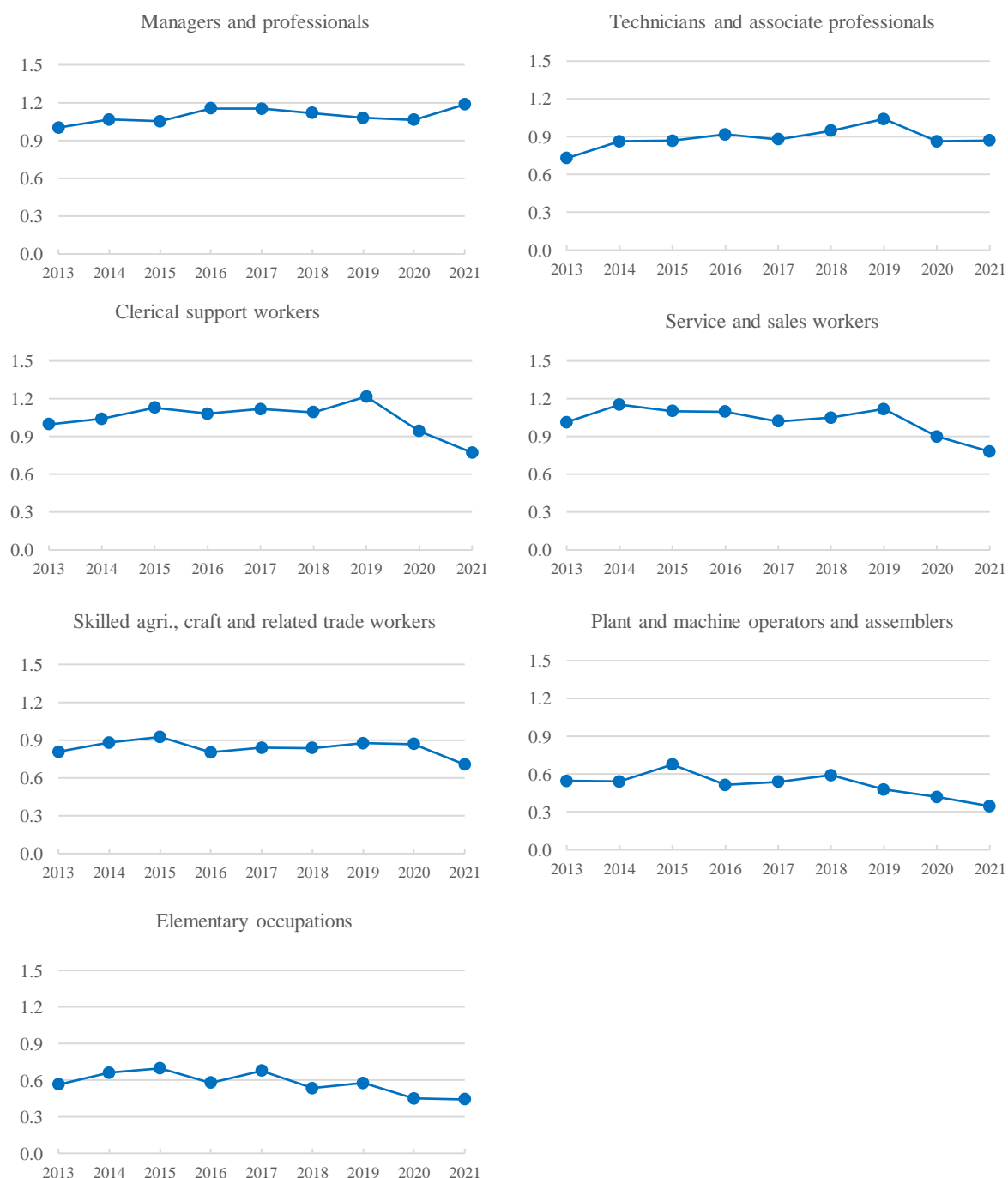
<sup>276</sup> European Commission's Expert Group on Gender and Employment, (2009). Gender segregation in the labour market Root causes, implications and policy responses in the EU; EIGE (2017). Gender Segregation in Education, Training and the Labour Market.; Borrowman, M., & Klasen, S. (2020). Drivers of gendered sectoral and occupational segregation in developing countries. *Feminist Economics*, 26(2), 62-94.

<sup>277</sup> A result which tend to be confirmed by the econometric analysis (Table 23). Furthermore, prevalence rate in industrial sectors (male dominated) tend to be lower which could indicate that male sectoral segregation negatively affect the number of male trainees.

## Annex 1.5.9 Occupations

Figure 43, Figure 44 and Figure 45 display evidence on paid traineeships by occupation. Figure 43 underlines that prevalence rates are highest in the clerical support, the managerial and professional and the service and sales occupations (1.2%, 1.1% and 1.1% in 2019). Prevalence rates are lower for plant and machine operators as well as elementary occupations (0.5% and 0.6% in 2019).

**Figure 43: Paid trainees in the EU27 by occupation**

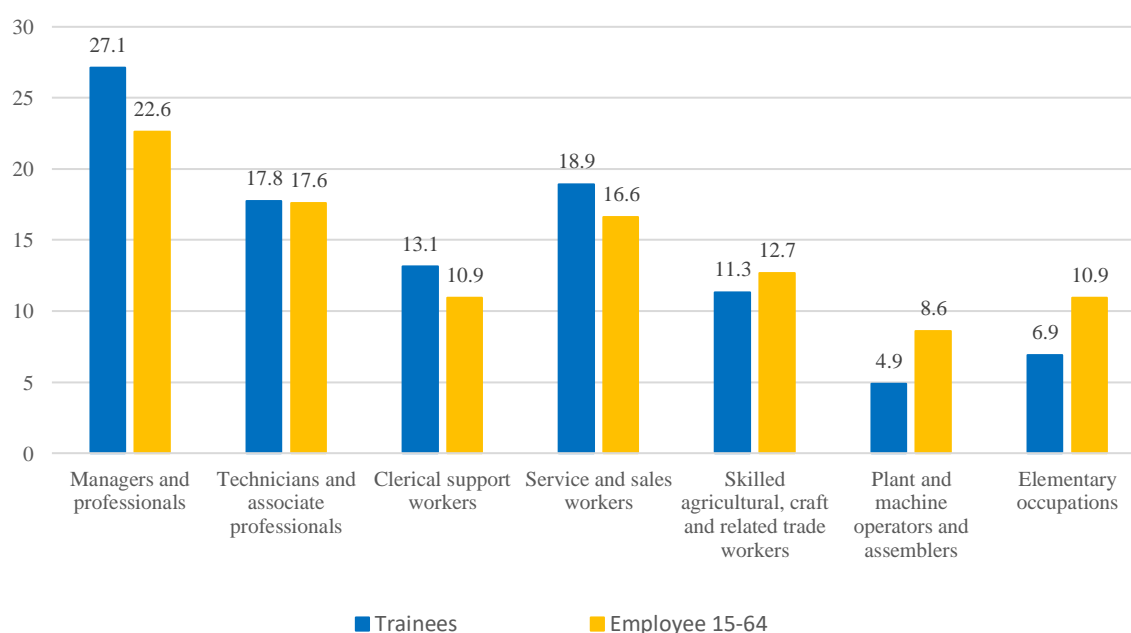


Note: Authors' estimation based on EU-LFS. Prevalence rates are defined as the number of trainees relative to the overall number of employees in the population aged 15-64 by occupations. See Table 17 for additional details on the occupation classification.

The occupational composition for trainees and employees is displayed in Figure 44 (EU27 level). At EU27 level, the largest share of trainees is in managerial and professional occupations (27.1% for the period 2016-2019), which is 4.5 percentage points greater than the same share for employees aged 15-64 (22.6%). Trainees are also more concentrated in occupations that can be linked to the service sector, like clerical support workers (13.1% of trainees and 10.9% of employees) or service and sales workers (18.9% and 16.6%). In contrast, the more manual and medium- or low-skilled occupations (e.g. elementary occupations and plant/machine operators/assemblers) only represent marginal shares of traineeships. Moreover, these shares are lower than observed for employees (around four percentage points lower for both occupation groups).

Figure 45 shows the occupational composition of paid traineeships by type. MPT exclusively take place in managers and professionals occupations<sup>278</sup>, whereas only 5% to 6% of ALMP traineeships take place in these occupations. ALMP traineeships are more prevalent in the medium-low skilled occupations of service and sales workers (30.8% in 2019) and craft and related trade workers (19.6% in 2019). ECT tend to be concentrated in medium- or high-skilled occupations linked primarily to the service sector. The four occupations managers and professionals, technicians and associate professionals, clerical support workers and service and sales workers represent between 84% and 88% of ECT (87.6% in 2019). The composition for OMT is more evenly distributed across occupations and displays shares similar to the aggregate occupational composition for traineeships.

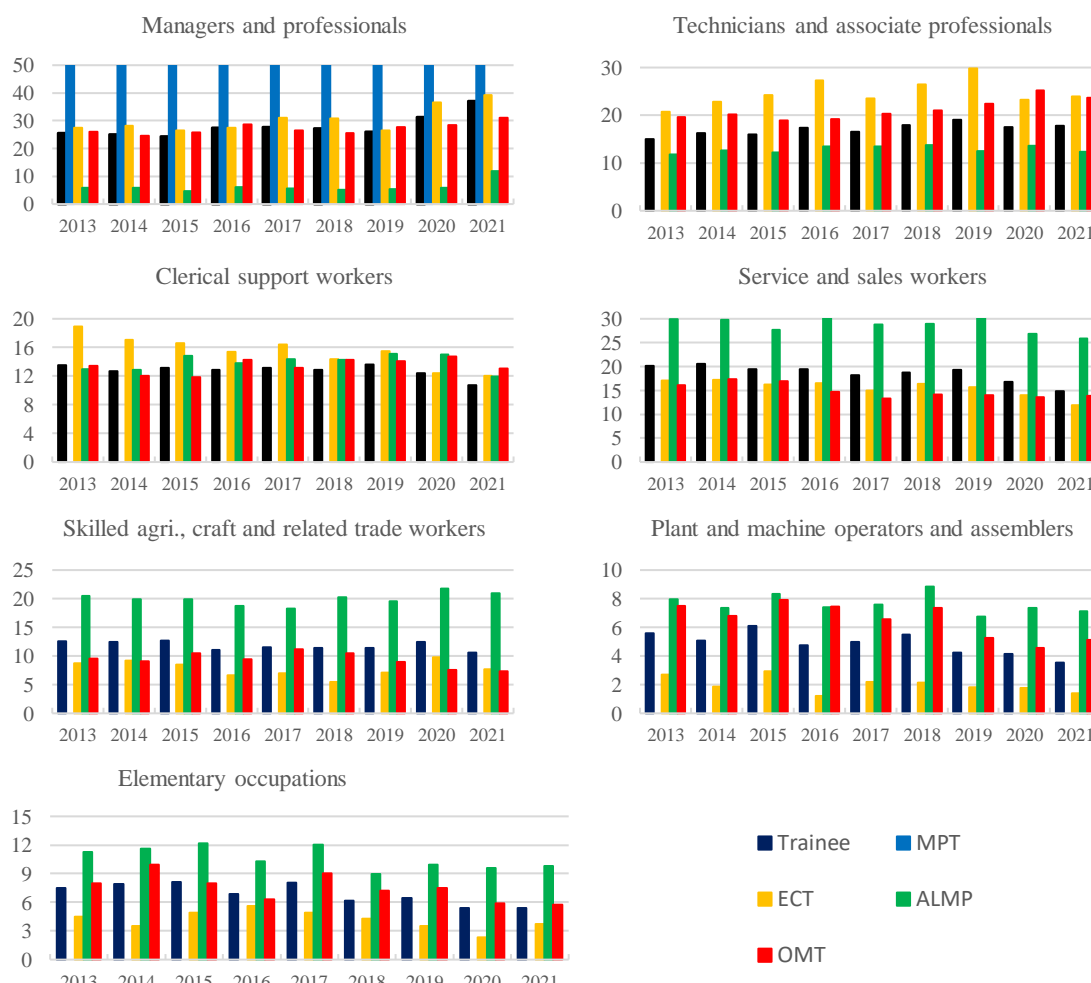
**Figure 44: Occupational composition for trainees and employees in the EU27**



Note: Authors' elaboration based on EU-LFS. Share of trainees and employees aged 15-64 by MS and occupations. Data is averaged over the 2016-2019 period.

<sup>278</sup> All occupations identified as requiring a MPT are part of this occupation group. See Annex 3 for more details on this matter.

Figure 45: Occupational composition of traineeships by type in the EU27



Note: Authors' elaboration based on EU-LFS. Share of traineeships by type and occupation (e.g. in 2013, 27.4% of ECT traineeships took place in managers and professionals occupations). MPT only take place in managers and professionals occupations by construction.

### Annex 1.5.10 Size of firms<sup>279</sup>

Finally, Figure 46 and Figure 47 focus on the composition of paid traineeships by firm size and by type of traineeships. At EU 27 level (Figure 46, panel a), the key pattern to note is that the prevalence of paid traineeships increases with the size of firms. The largest share of traineeships is found in medium- and large-sized firms (more than 50 employees), a proportion that has increased slightly over time (45.5% in 2019, an increase of 3.4 percentage points since 2013). Traineeships in small enterprises (10-49 employees) represent around 30% of traineeships (29.9% in 2019) whereas one in four traineeships took place in micro-companies (less than 10 employees), a share which has decreased since 2013 (28.6%).

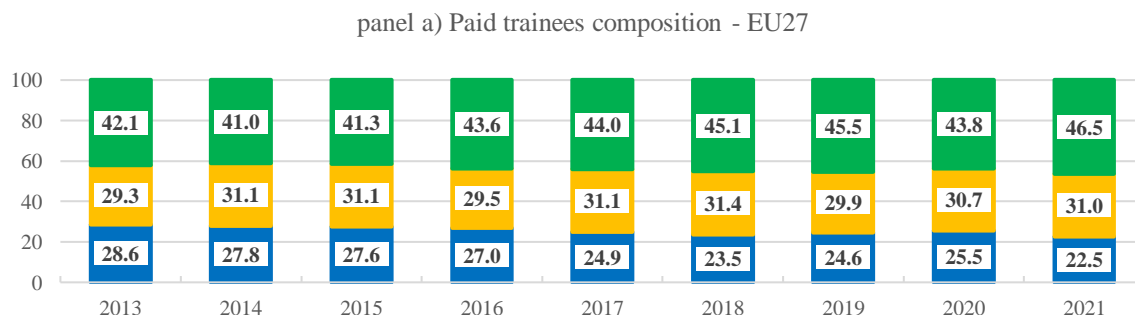
<sup>279</sup> The firm size variable in the EU-LFS can only be classified consistently, for all MS and all years, in two categories: less than 10 employees and 10 or more. The categories 10-49 and more than 50, displayed in Figure 46 Figure 47, have been recovered for trainees and apprentices through the missing values imputation procedure (see Annex 3). This three categories are therefore not available for the total stock of employees. As a result, it is not possible to generate prevalence rates for this variable. In the 2023 Eurobarometer, a more detailed categorisation of firm size is available. See Figure 48 and Figure 49.



**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

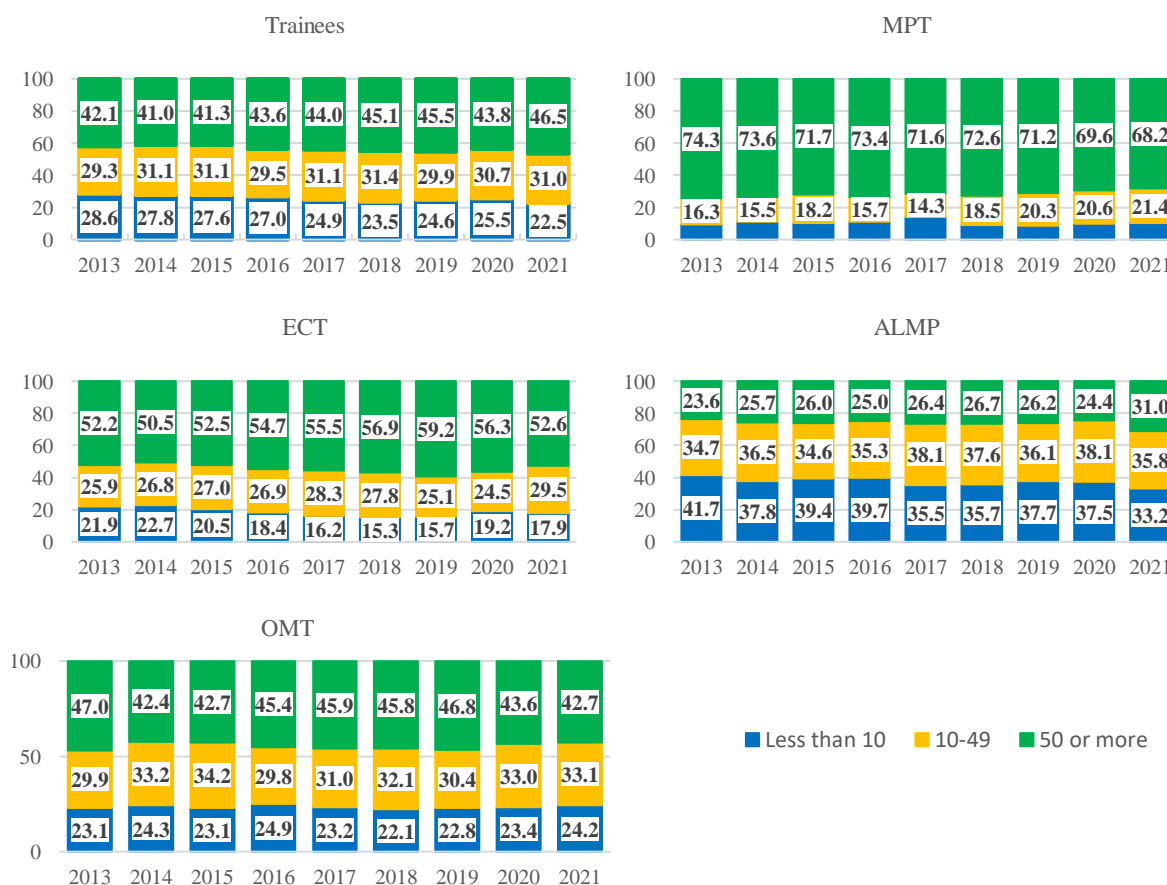
Regarding the type of traineeship (Figure 47), there is again a certain difference appearing between MPT on the one hand, and ALMP traineeships on the other. More than 70% of MPT take place in medium to large firms (71.2% in 2019) whereas this figure is reversed for ALMP traineeships (more than 70% of traineeships in micro and small firms - 73.8% in 2019). Distributions for ECT and OMT are more balanced and in line with the overall composition for traineeships, although ECT also show higher prevalence in medium to large firms (59.2% in 2019).

**Figure 46: Paid traineeships by firm size in the EU27**



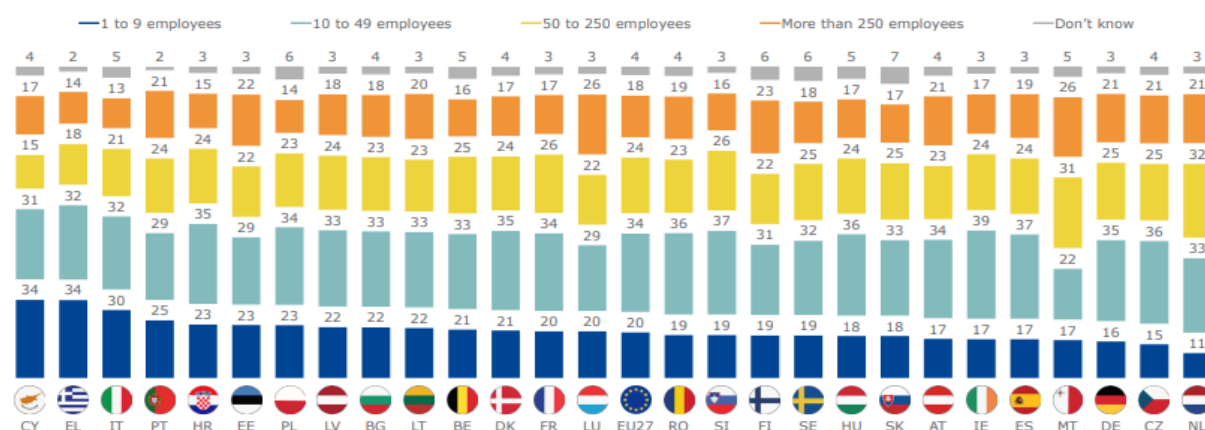
Note: Authors' estimation based on EU-LFS. The three categories are the only ones that can be recovered consistently for all MS in the EU-LFS. Before 2021, the category "Less than 10" actually corresponds to "Less than 11" and "10-49" to "11-49".

**Figure 47: Traineeship composition by traineeship type and size of firm in the EU27**



Note: Authors' elaboration based on EU-LFS. Percentages below 15% are not displayed.

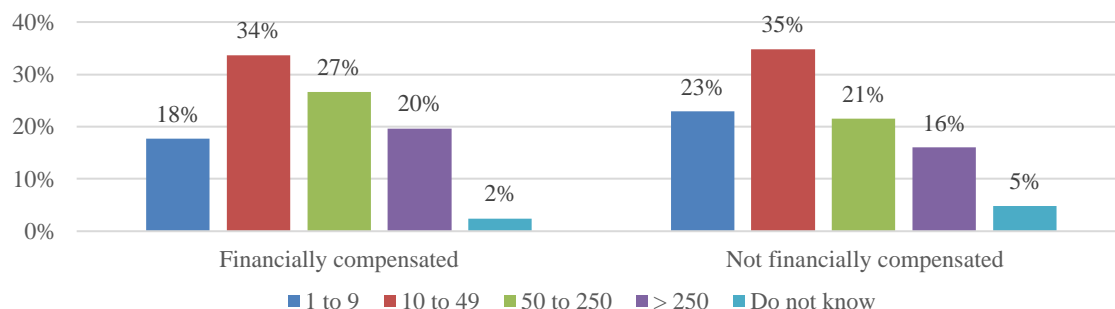
Figure 48: Size of the hosting company or organization, Eurobarometer 2023



Base: Respondents who have done at least one traineeship (n=18 361)

Note: Eurobarometer 2023, p.16

Figure 49: firm size for paid and unpaid traineeships, Eurobarometer 2023



Note: Own elaboration from Eurobarometer 2023 results.

## Annex 1.6. Additional characteristics of trainees in the Eurobarometer

According to the Eurobarometer, the population of unpaid trainees is skewed towards women at EU level (54.8%). In all countries except HR (44.9%), PL (47.1%), IT (49.8%) and CZ (50%), more than 40% of unpaid trainees are women. This contrasts with paid trainees in the Eurobarometer, where men make up a larger share (56.6%) of the population. As regards age, at EU level, the largest share of unpaid trainees is part of the age group 18-24 (37.9%), followed by trainees aged 30-34 (34.4%) and 25-29 (27.6%). As such, unpaid trainees overall are younger than paid trainees. However, there is significant variation in these patterns across Member States. In FR (46.4%), PT (43.6%), IT (41.1%), NL (38.2%), HR (38.1%), DE (36.9%), ES (36%), SI (36%) and LU (34.6%), the largest share of unpaid trainees are aged 18-24. In contrast, in BG (48.4%), EE (45.7%), HU (42.9%), LV (42.5%), LT (42.1%), RO (40.9%), FI (40.7%), MT (40%), CY (39.2%), SK (38.9%), IE (38%), SE (36.5%), PL (36.4%), CZ (35.8%), EL (35.2%) and BE (35%), the age group 30-34 is the most represented. AT (35.2%) and DK (37.4%) are the only two countries where the age group 25-29 constitutes the largest share of unpaid trainees.

With regard to education, the majority of unpaid trainees are in either post-secondary non-tertiary education (33.8%) or tertiary education (26.3%), followed by upper secondary VET

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

(24.8%). The Eurobarometer data for paid trainees shows similar patterns, with the largest share in post-secondary non tertiary (39.2%), followed by upper secondary VET (24.6%) and tertiary education (24%). Individuals with either post-secondary non-tertiary education or tertiary education constitute the largest share of unpaid trainees in all EU countries, with the exception of SE, where upper secondary VET is the most represented (44.4%). Finally, turning to urbanisation, across the EU27, the largest share of unpaid trainees are from a small or medium town (42.4%) or a large town/city (30.2%), with the smallest share from a rural area or village. These shares are similar to the ones for paid trainees. However, there are also a minority of countries where the largest share of unpaid trainees are from a rural area or village, including LU (53.9%), SI (47.3%), BE (40%), MT (38.7%) and AT (36.8%).

**Table 25: Composition of trainees by gender, Eurobarometer 2023 (%)**

MS	Paid trainees				Unpaid trainees			
	Male	Female	In another way	Prefer not to say	Male	Female	In another way	Prefer not to say
AT	53.4	46.1	0.6	0.0	39.0	61.0	0.0	0.0
BE	67.5	32.5	0.0	0.0	38.3	61.3	0.4	0.0
BG	58.0	41.4	0.0	0.6	42.4	57.2	0.5	0.0
CY	53.3	45.6	0.0	1.1	37.9	60.7	0.7	0.7
CZ	65.1	34.7	0.3	0.0	48.9	50.0	1.1	0.0
DE	58.5	41.3	0.2	0.0	44.7	55.3	0.0	0.0
DK	60.6	39.2	0.3	0.0	45.2	54.4	0.3	0.0
EE	60.6	38.8	0.0	0.6	39.9	59.1	1.0	0.0
EL	53.7	46.2	0.2	0.0	41.5	58.0	0.5	0.0
ES	59.1	40.7	0.2	0.0	42.5	57.1	0.2	0.2
FI	64.4	34.8	0.8	0.0	41.1	58.2	0.5	0.2
FR	54.6	44.9	0.0	0.4	44.3	55.7	0.0	0.0
HR	53.3	45.9	0.6	0.2	53.3	44.9	1.8	0.0
HU	58.2	41.8	0.0	0.0	47.7	51.5	0.8	0.0
IE	55.5	43.7	0.8	0.0	43.5	55.7	0.8	0.0
IT	52.9	47.1	0.0	0.0	49.7	49.8	0.3	0.3
LT	65.8	33.1	1.1	0.0	46.7	53.0	0.0	0.3
LU	52.7	46.7	0.0	0.6	44.6	55.0	0.4	0.0
LV	60.6	38.7	0.7	0.0	43.3	56.0	0.7	0.0
MT	61.6	37.8	0.6	0.0	46.6	52.4	1.0	0.0
NL	56.3	43.2	0.5	0.0	39.2	59.6	1.1	0.0
PL	51.2	48.1	0.7	0.0	52.5	47.1	0.4	0.0
PT	54.4	45.1	0.5	0.0	47.3	51.8	0.6	0.3
RO	58.3	41.5	0.2	0.0	46.1	53.4	0.4	0.0
SE	63.0	36.6	0.4	0.0	42.2	57.8	0.0	0.0
SI	61.3	38.5	0.2	0.0	42.5	56.5	0.5	0.5
SK	55.1	44.7	0.2	0.0	49.9	50.1	0.0	0.0
EU27	56.6	43.2	0.2	0.1	45.0	54.8	0.2	0.1

**Table 26: Composition of trainees by age, Eurobarometer 2023 (%)**

MS	Paid trainees			Unpaid trainees		
	18-24	25-29	30-34	18-24	25-29	30-34

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

AT	35.2	28.1	36.7	32.8	35.2	32.0
BE	36.2	27.8	36.0	33.4	31.6	35.0
BG	29.3	29.8	40.8	29.2	22.4	48.4
CY	33.5	28.6	37.8	26.4	34.5	39.2
CZ	34.0	29.6	36.3	31.5	32.7	35.8
DE	34.3	27.2	38.5	36.9	27.8	35.4
DK	36.5	27.4	36.1	28.4	37.4	34.2
EE	27.3	29.2	43.6	23.3	31.0	45.7
EL	31.4	29.1	39.5	33.2	31.6	35.2
ES	31.7	27.3	41.0	36.0	28.6	35.4
FI	37.7	30.6	31.7	26.6	32.7	40.7
FR	34.0	27.2	38.8	46.4	23.2	30.4
HR	33.4	28.5	38.1	38.1	34.5	27.5
HU	35.9	33.5	30.7	28.1	29.0	42.9
IE	37.7	26.6	35.7	34.7	27.3	38.0
IT	27.7	29.6	42.7	41.1	26.6	32.3
LT	34.1	36.1	29.7	25.3	32.6	42.1
LU	28.9	31.6	39.4	34.6	32.0	33.5
LV	34.2	25.7	40.1	28.5	28.9	42.5
MT	33.0	34.8	32.2	26.0	33.9	40.0
NL	36.3	28.2	35.5	38.2	30.7	31.1
PL	24.0	29.4	46.6	35.9	27.7	36.4
PT	31.4	28.7	39.9	43.6	27.1	29.3
RO	32.4	27.8	39.7	31.9	27.1	40.9
SE	42.8	26.4	30.9	34.0	29.6	36.5
SI	34.7	27.2	38.1	36.0	30.0	34.0
SK	35.8	24.7	39.5	32.5	28.6	38.9
EU27	32.4	28.2	39.4	37.9	27.6	34.4

**Table 27: Composition of trainees by level of education, Eurobarometer 2023 (%)**

MS	Paid trainees						Unpaid trainees					
	Lower 2 <sup>nd</sup>	Upper 2 <sup>nd</sup> general ed.	Upper 2 <sup>nd</sup> VET	Post-2 <sup>nd</sup> non tertiary	Higher ed.	Don't know	Lower 2 <sup>nd</sup>	Upper 2 <sup>nd</sup> general ed.	Upper 2 <sup>nd</sup> VET	Post-2 <sup>nd</sup> non tertiary	Higher ed.	Don't know
AT	5.9	2.3	16.3	35.8	37.1	2.6	3.1	1.6	18.9	30.0	39.1	7.3
BE	11.3	22.9	21.3	38.4	3.4	2.7	11.0	12.5	31.7	33.9	7.9	2.9
BG	0.9	11.4	18.0	34.6	34.4	0.8	0.0	2.4	8.6	52.8	36.2	0.0
CY	3.4	3.4	37.6	39.9	12.4	3.3	0.0	0.0	32.7	36.2	27.6	3.6
CZ	3.1	4.8	28.7	58.5	4.1	0.8	8.0	5.2	23.2	54.1	7.6	1.9
DE	0.0	9.7	8.9	49.8	29.5	2.0	5.9	4.2	27.1	24.1	32.2	6.6
DK	1.6	26.0	23.4	44.6	4.5	0.0	1.7	24.5	22.8	40.3	8.7	1.9
EE	1.0	6.3	29.1	55.7	7.9	0.0	2.5	11.0	26.0	52.0	8.4	0.0
EL	0.0	6.5	33.5	44.0	16.0	0.0	4.4	4.6	19.6	40.2	31.2	0.0
ES	3.1	0.0	29.2	12.5	55.2	0.0	0.0	9.2	5.1	32.3	52.0	1.4
FI	0.0	13.1	14.3	40.2	32.4	0.0	0.0	12.2	9.5	54.6	23.7	0.0
FR	7.7	9.9	28.4	26.9	22.1	4.9	9.9	5.5	29.1	34.6	17.3	3.6

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

HR	0.0	4.5	28.9	54.2	11.7	0.7	0.0	0.0	39.7	50.9	5.3	4.1
HU	1.6	5.7	9.2	49.0	34.5	0.0	1.4	8.8	6.3	34.3	49.1	0.0
IE	8.7	15.7	20.2	20.3	30.9	4.1	2.4	17.0	23.1	25.8	31.7	0.0
IT	4.9	7.4	33.5	50.6	3.6	0.0	2.0	9.0	36.6	45.9	6.5	0.0
LT	3.1	6.1	23.3	32.8	34.8	0.0	3.6	8.6	24.2	21.2	39.0	3.4
LU	4.5	7.5	20.4	55.5	12.0	0.0	0.0	4.0	39.0	31.8	25.2	0.0
LV	1.1	6.5	39.4	40.6	12.4	0.0	1.5	19.0	27.1	41.8	10.5	0.0
MT	0.0	10.5	18.8	34.6	36.0	0.0	0.0	10.3	32.0	24.0	33.7	0.0
NL	3.6	6.9	9.8	4.5	75.1	0.0	5.8	12.6	13.6	9.0	56.5	2.5
PL	0.0	3.2	37.3	46.1	13.4	0.0	0.0	3.7	15.6	66.9	10.8	3.0
PT	1.5	20.0	30.6	31.7	16.1	0.0	3.1	9.1	31.3	46.9	9.5	0.0
RO	2.8	8.2	20.1	25.2	37.2	6.5	14.3	0.0	18.3	16.2	45.5	5.6
SE	5.7	11.8	50.5	22.5	7.9	1.5	0.7	6.9	44.4	26.5	21.4	0.0
SI	1.5	5.7	35.8	35.5	21.6	0.0	0.0	7.0	32.0	33.6	27.4	0.0
SK	5.5	17.2	30.5	42.4	4.4	0.0	5.5	12.6	30.4	51.5	0.0	0.0
EU27	3.0	8.0	24.6	39.2	24.0	1.3	5.1	6.7	24.8	33.8	26.3	3.3

**Table 28: Composition of trainees by level of urbanisation, Eurobarometer 2023 (%)**

MS	Paid trainees				Unpaid trainees			
	Rural area or village	Small or medium town	Large town/city	Don't know	Rural area or village	Small or medium town	Large town/city	Don't know
AT	46.8	25.2	28.0	0.0	36.8	33.2	30.0	0.0
BE	42.9	38.0	19.1	0.0	40.0	40.3	19.7	0.0
BG	12.5	29.8	57.7	0.0	6.8	32.8	60.5	0.0
CY	23.7	39.1	37.2	0.0	23.1	36.6	40.3	0.0
CZ	26.4	45.1	28.5	0.0	26.3	39.4	34.3	0.0
DE	35.0	37.0	28.0	0.0	32.8	41.2	25.9	0.0
DK	22.6	42.5	34.9	0.0	19.1	29.7	51.1	0.0
EE	26.1	21.7	52.2	0.0	17.7	31.1	51.1	0.0
EL	13.3	33.3	53.4	0.0	10.2	38.4	51.4	0.0
ES	21.4	37.3	41.3	0.0	21.1	46.8	32.2	0.0
FI	15.3	39.1	45.6	0.0	11.7	45.7	42.6	0.0
FR	33.1	31.3	35.6	0.0	35.6	36.3	28.1	0.0
HR	27.4	44.6	28.0	0.0	19.3	52.4	28.2	0.0
HU	25.7	43.6	30.8	0.0	21.1	46.3	32.7	0.0
IE	35.1	33.4	31.5	0.0	32.4	34.8	32.8	0.0
IT	20.6	55.0	24.4	0.0	15.2	57.3	27.5	0.0
LT	22.1	30.0	47.9	0.0	12.9	25.3	61.7	0.0
LU	48.5	39.4	12.1	0.0	53.9	37.3	8.9	0.0
LV	22.2	43.4	34.4	0.0	19.3	29.4	51.3	0.0

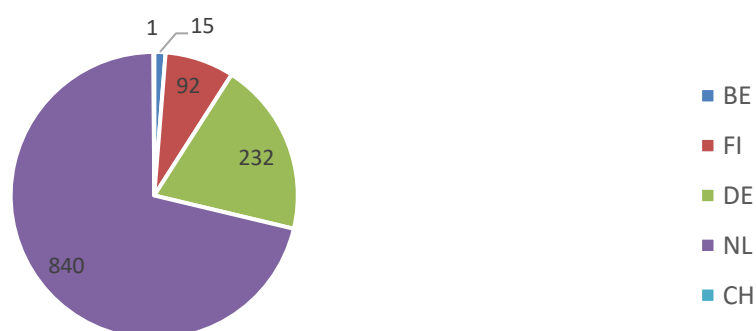
**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

MT	39.8	47.1	13.1	0.0	38.7	31.9	29.3	0.0
NL	28.7	43.3	28.0	0.0	31.3	45.6	23.1	0.0
PL	27.6	39.4	32.9	0.0	21.4	38.2	40.4	0.0
PT	24.0	41.5	34.5	0.0	18.8	45.1	36.1	0.0
RO	23.2	35.9	40.9	0.0	26.7	36.1	37.2	0.0
SE	24.6	40.2	35.2	0.0	23.7	42.9	33.4	0.0
SI	49.1	33.3	17.6	0.0	47.3	37.1	15.6	0.0
SK	38.0	43.3	18.7	0.0	38.4	48.9	12.7	0.0
EU27	28.6	38.6	32.8	0.0	27.4	42.4	30.2	0.0

## Annex 1.7. Detailed analysis of the vacancy data

While EURES is accessible to employers in all EU member states (as well as Switzerland), the platform is not used to the same extent in different countries. This is reflected in the distribution of internship vacancies by country: 71% are internship opportunities in the Netherlands, 20% in Germany, 8% in Finland and 1% in Belgium (Figure 50).

**Figure 50: Vacancies by country**



A similar distribution is found also for the language of the vacancy, with only 1% of vacancies posted in English (9 vacancies).

As illustrated in Table 29, 28% of the internship vacancies include an explicit mention of the level of experience. Of them, about one-third (i.e. 9% of total) does not require any experience. In principle, these vacancies together with those in which the experience is 'not specified', which together makes about 80% of total vacancies, contain no requirement of previous experience, as it should be the case in a real traineeships.

**Table 29: Overview level of experience in traineeship vacancies**

Level of experience	Number of Internship vacancies	% of Internship vacancies
None required	101	9%
Up to 1 year	62	5%
Between 1 and 2 years	139	12%

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

Between 2 and 5 years	24	2%
More than 5 years	10	1%
Not Specified	844	72%

By contrast, about 20% of total internship vacancies seems to require prior experience. For more than half of them (12% of total), this is between 1 and 2 years and, for some, it is even higher, which seems very much at odd with the idea of genuine traineeship as a working experience to enter the labour market.

A disaggregation of the vacancies by countries suggests that in fact experience to apply for an traineeship is only required in a very few cases in Belgium and most often in the Netherlands (see Table 30).

**Table 30: Distribution of level of experience across countries(number of vacancies)**

Level of experience	Total	NL	DE	FI	BE	CH
None required	101	92	0	0	9	0
Up to 1 year	62	57	0	0	5	0
Between 1 and 2 years	139	138	0	0	1	0
Between 2 and 5 years	24	24	0	0	0	0
More than 5 years	10	10	0	0	0	0
Not Specified	844	519	232	92	15	1

In order to better understand what level of experience means, we dig more in depth into the actual content of the vacancies requiring experience.

In the case of the six vacancies posted in Belgium, it is unclear whether prior experience is genuine a requirement for application. None of the vacancies list experience among the eligibility criteria or in the description of application requirements in the main body of the vacancy. Furthermore, in all cases those criteria seem appropriate for inexperienced candidates. However, under the "Experience" heading, all vacancies state 'unspecified,' followed by a duration of 1 or 2 years in parentheses. This makes it challenging to draw definitive conclusions about whether prior experience is a requirement..

In the case of the Netherlands, at least three different cases emerge.

First, in most of the vacancies requiring a level of experience above 5 years, the actual experience required is 1 year, but it could have occurred in a variety of areas (5 or above, hence adding up to 5 years and above under the heading experience). In one case, experience refers to what looks like having completed a period of mandatory traineeship to become an accountant. In all cases, the positions are remunerated at competitive wages (EUR 2,200 and above), making the internship looking like a first job. The job descriptions seem also to point to experience and ability to work independently that is unlikely to be met by students/ recent graduates or someone new to the labour market.

Other examples of vacancies requiring between 2 and 5 years of experience often report a long list of requirements, and the description seems to point to real jobs, carrying competitive salaries and in some cases offering affiliation to a pension scheme.

Second, in some cases, the internship clearly requires prior experience and it is not paid. These cases are clear at odd with the definition of traineeship but also of first paid job, even if labelled traineeship.

Third, in some case the requirement of experience comes with a clarification in the text explaining that it is either “desirable” or considered as an “advantage” but not an actual requirement to get the traineeships. In such cases, the vacancies seem to be consistent with the idea of a real traineeship.

Overall two main messages from the analysis of the EURES. First, there are cases in which vacancies of traineeships includes prior experience as requirement, pointing to problematic traineeships. Second, the number of cases is much lower than the sheer numbers of vacancies requiring experience from EURES could suggest. A case-by-case analysis of vacancies is required to identify problematic traineeship vacancies. However, cases of employers requiring prior experience for traineeships clearly exist.



## Annex 1.8. Mapping of legal provisions across Member States

Table 31: Employee status under national law, by country and type of traineeship

	Employee status	Other legally defined status (indicate which)	Variable legal status depending on employment-relevant characteristics of traineeship (subordination, pay, etc)	No legally defined status	comments
OMT	BG, CY, SI [3 MS]	BE (non-contractual worker), PT (traineeship), RO (depending work relationship), SE (fixed term employment) [4 MS]	DK, DE, EE, ES, HR, LV, LT, MT, NL, PL, SK, FI [12 MS]	CZ, IE, EL, IT, LU, HU, AT [7 MS]	1NA (FR)
ALMP	BG, LV [2 MS]	Unemployed: DK, EE, ES, HR, IT, CY, LU, MT, AT, PL, PT, RO, SK, FI, SE [15 MS]	BE, CZ, EL, FR, LT [5 MS]	DE, IE, NL [3 MS]	2 NA (HU, SI)
ECT	BG [1 MS]	Student: BE, CZ, FR, IT, PT, RO, SI, SK, SE [9 MS] LU, MT (uncertain) [2 MS]	DK, DE, EE, HU, AT, LV, LT, NL, FI [9 MS]	CY, EL, IE, ES, PL [5 MS]	1 NA (HR)
MPT medical	CZ, DK, EE, EL, IE, , CY, LV, LT, HU, MT, NL, AT, PL, RO, SI, SK, FI, SE [18 MS]	Sui generis: BE, DE, FR, ES, IT, PT [6 MS]	HR [1 MS]	BG, LU [2 MS]	

Table 32: Legal provisions on status and remuneration - ALMP

MS	Relevant legislation	Labour market status of trainee	Remuneration
AT	Unemployment Insurance Act ( <u>Arbeitslosenversicherungsgesetz</u> – AIVG § 9 (7))	Unemployed	Unemployment benefits
BE	1)Chapter VIII of the Employment Promotion Act of 24 – Rosetta plan 2) Federal Programme Law	Variable legal status  1) Regular employment contract or a combination of a part-time employment contract and training undertaken by the young person.	Requirement on remuneration other than minimum wage  1) Minimum guaranteed average minimum monthly income. Hiring a young person with at least a half-time employment contract, the

STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Relevant legislation	Labour market status of trainee	Remuneration
		2) Not employee. In some cases, self-employed under labour law	employer has the option, during the first 12 months of employment, to spend an amount equal to a maximum of 10 per cent of the young person's salary on training. 2) Obligation to pay a minimum compensation.
BG	Employment Promotion Law (EPL) Labour code: Financial support by PES	Employee status Employment contract for work-based training under Art. 230 LC Employment contract for a traineeship under Art. 233b LC Temporary employment contract	At least minimum wage
CY	Subsidised	Unemployed	Requirement on remuneration other than minimum wage  Remuneration in alignment with the long-term unemployed minimum wage threshold (EUR 940)
CZ	Act No. 435/2004 Coll, Act on Employment	Variable legal status Either unemployed (job seeker) or employee (interested in changing jobs)	Requirement on remuneration other than minimum wage  If trainees have employee status, they are entitled to the minimum wage, but otherwise they receive compensation based on past earnings
DE	Section 54a of SGB III	No legally defined status	Requirement on remuneration other than minimum wage
DK	Active Labour Market Act	Unemployed	Requirement on remuneration other than minimum wage
EE	Labour Market Services and Benefits Act	Unemployed	Trainees receive benefits. In the specific case where the person is already employed at the company, but was away for health-related reasons, there is an employment relationship and trainees are covered by collective agreements. Unemployment benefits  Unpaid but trainees receive unemployment benefits or unemployment allowance
EL	National Strategy for Active Labour Market Policies (ALMPs); Law 4763/2020	Variable legal status Unemployed in first stage, employed in second stage	Case by case  The traineeship is remunerated. The level of payment varies and depends on the type and stage of program.
FI	Act on Public Employment and Business Service	Unemployed	Unemployment benefits
ES	Royal Decree 1543/2011	Unemployed	Requirement on remuneration other than minimum wage  Minimum compensation of 80% IPREM (Public Income Indicator of Multiple Effects, EUR 600 in 2023).
FR	Articles L. 5135-1 ss. Labour Code Articles L-6311-1 and 6341-1 to 6343-4 of the Labour Code	Variable legal status Trainees retain the status they benefited from before (either registered unemployed, or workers) Employed or unemployed worker (depending on previous status)	Requirement on remuneration other than minimum wage  Trainees retain previous benefits or remuneration depending on their status (unemployed or worker) Monthly wage of job-seekers and self-employed workers following a part-time traineeship is equivalent to the monthly remuneration they would have received for a full-time training course divided by 151.67 for each hour of training. Cannot be less than the solidarity

STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Relevant legislation	Labour market status of trainee	Remuneration
			allowance.
HU	Not applicable		
HR	1)Article 37(1) of the Labour Market Act 2)N/S	Unemployed 1) Unemployed (up to 30 y.o.) 2)Unemployed	Requirement on remuneration other than minimum wage  1) Minimum wage minus contributions for mandatory social security insurance and a compensation for the cost of taking a professional or masters' exam. 2)Salary paid by PES
IE	Further Education and Training Act 201	No legally defined status	Requirement on remuneration other than minimum wage Continued access to social welfare benefits.
IT	Agreement between the State and Regions (Agreement 25/05/2017) based on Article 1(34), law no. 92/2012	Unemployed Unemployed and workers in transition	Requirement on remuneration other than minimum wage Minimum remuneration at (gross) EUR 500/month
LT	Article 39 of the Law on Employment	Unemployed Unemployed, aimed at improvement or restoration of the person's work skills or professional qualifications	Requirement on remuneration other than minimum wage Allowance: 39% of MW or EUR 327.6 or unemployment benefit if they are entitled (choice of trainees)
LV	Regulation on procedure of organisation, financing of active employment measures and measures preventing unemployment and selection of persons implementing respective measure	Employee status	At least minimum wage
LU	1) L. 543-1 to L. 543-13 Labour Code 2) L. 543-14 to L.543-28 3) L. 543-14 to L.543-28	Unemployed 1) No employee status (Young unemployed) 2) No employee status (Young unemployed) 3) No employee status (Elderly or vulnerable unemployed )	Salary of 1.5 times the statutory MW. Requirement on remuneration other than minimum wage 1) and 2) "Allowance" calculated by reference to the minimum social wage (unskilled). If this amount is less than the unemployment benefit ( <i>indemnité de chômage</i> ) to which he or she would be entitled, the difference is paid by the Employment Fund for as long as he or she would have been entitled to unemployment benefit. 3) Unemployment benefit, increased at least to the level of the minimum social wage, or compensation if the employee does not receive unemployment benefits
MT	Employment and Training Services Act	Unemployed	At least minimum wage
NL	No specific legislation; falls under general Dutch labour law	No legally defined status Several possibilities (could be employee in some cases)	Case by case Remuneration dependent on the specific case and employment status
PL	Law of 20.04.2004 on employment promotion and labour market institutions	Unemployed	Requirement on remuneration other than minimum wage Training allowance amounting to 120% of the unemployment benefit.
PT	Ordinance no. 206/2020, of 27 August	Unemployed	Requirement on remuneration other than minimum wage Remuneration paid by employer, with financial contribution of PES in the amount of 65 / 80 EUR. Monthly internship grant between 1,3 IAS (currently, EUR 624.56) and 2,5 re (currently, EUR 1 201.08), depending on their qualification level. Meal allowance and, in certain cases, transport allowance.
RO	Government Ordinance No 129/2000	Unemployed	Insufficient data
SE	<u>Förordning (2013:1157) om stöd för yrkesintroduktionsanställningar.</u>	Unemployed	Requirement on remuneration other than minimum wage Remuneration is obligatory and it has to follow the relevant collective agreement
SI	Not applicable		

## STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Relevant legislation	Labour market status of trainee	Remuneration
SK	Act No. 5/2004 Coll. on Employment Services	Unemployed	Case by case PES contributes 100% to the costs of education and training: the Office may provide the jobseeker with the allowance for education and training for the labour market in the amount of 100 % of the expenses of education and training for the labour market and the expenses related to education and training for the labour market

**Table 33: Legal provisions on status and remuneration - OMT**

MS	Relevant legislation/documentation	Labour market status of trainee	Remuneration
AT	OMT traineeships are not specifically defined within Austrian labour law  Specific provisions for traineeships with the state (Vertragsbedienstetengesetz - VBG) Specific provision: Traineeships with the state	No legally defined status	Remuneration not obligatory Unpaid traineeships are possible and minimum wage does not apply For state traineeships: ad-hoc wage scale
BE	Loi-Programme (1) 2022 Art 104-12	Other legally defined status Non - contractual worker	Requirement but lower than minimum wage or comparable worker if conditions are met Variable conditions based on regional regulation
BG	Art. 230 and 233b Labour Code	Employee status	Minimum wage In the case of a contract under Art. 230 LC (not less than 90 % of the minimum wage established for the country); In the case of a contract under Art. 233b LC (not less than the minimum wage established for the country)
CY	Περί Κατώτατου Ορίου Μισθών Διάταγμα του 2022, Διάταγμα δυνάμει του άρθρου 3 (1), Ο ΠΕΡΙ ΚΑΤΩΤΑΤΟΥ ΟΡΙΟΥ ΜΙΣΘΩΝ ΝΟΜΟΣ (ΚΕΦ. 183), ΑΝΑΚ. 307., Κ.Δ.Π. 350/2022, Ε.Ε. Παρ. ΙΙΙ(Ι), Αρ. 5737, 2.9.2022, Αριθμός 350.	Employee status	A least minimum wage if conditions are met Traineeships of less than two months are excluded from the minimum wage
CZ	OMT traineeships are not specifically regulated by labour law	No legally defined status  Legal status is not explicitly regulated by Czech law. The Labour Code regulates two types of agreement outside the employment relationship (DPP/DPC)	At least minimum wage if conditions are met For traineeships considered as regular employment, the minimum wage applies Unpaid traineeships are possible under DPP/DPC
DE	There are no specific legal provisions on OMT traineeships in Germany Specific provisions in the Minimum Wage Act	Variable legal status Employment relationship or training/educational relationship	At least minimum wage if conditions are met Unpaid traineeships are possible for a duration of less than three months
DK	No specific regulation: Trainees are covered by general regulations with respect to safety at work and insurance	Variable legal status Legal status is not explicitly defined by law Employee status or training/educational relationship	Remuneration not obligatory Unpaid traineeships are possible If trainees have employee status, collective agreements apply

## STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Relevant legislation/documentation	Labour market status of trainee	Remuneration
EE	There are no specific legal provisions on OMT traineeships in Estonia	Variable legal status Status depends on whether an employment contract is concluded or not	At least minimum wage if conditions are met Unpaid traineeships are possible In case of employment contract, the minimum wage applies
EL	OMT traineeships are not specifically regulated but fall under regular employment law in principle	No legally defined status The status of trainees is not explicitly defined by labour law; in practice, they have quasi-employee status Quasi-employee status	At least minimum wage if conditions are met
FI	Employment Contracts Act (Työsopimuslaki, 55/2001) but does not cover all OMT	Variable legal status Employment status if requirements set in the Act are met	Requirement on remuneration in some cases, level unclear Under the Employment Act, an employment relation means to perform work for an employer under the employer's direction and supervision in return for pay or some other remuneration. Unpaid is possible if employment relation does not exist
ES	Article 11(3) of the Worker Statute regulates Labour OMTs, while voluntary OMTs are not specifically regulated.	Variable legal status Labour trainees have employee status, while voluntary trainees do not	Requirement but lower than minimum wage or comparable worker if conditions are met Labour trainees receive remuneration proportionate to regular employees: MW + 60% (first year) 75% *2nd yr of CBA wage of comparable worker There is no regulation for voluntary trainees
FR	Not applicable - prohibited in France by: Article L. 124-3 and Article L. 124-7 of the French Code of Education		
HU	There is no specific regulation for OMT traineeships Specific provisions exist on employment with a scholarship	No legally defined status	At least minimum wage if conditions are met  Unpaid traineeships are possible. For employment with a scholarship, minimum wage applies
HR	Article 55 of the Labour Act Act on Volunteering (Official Gazette Nos 58/2007, 22/2013, 84/2021) Act on the Performance of Student Work (Official Gazette Nos 96/2018, 16/2020)	Variable legal status Employee status applies for paid traineeships, but not for paid ones	At least minimum wage if conditions are met Minimum wage applies where trainees have employee status
IE	There are no specific legal provisions on OMT traineeships in Irish labour law	No legally defined status	At least minimum wage if conditions are met  Unpaid possible but uncommon
IT	Provisions on traineeships exist at regional level	No legally defined status	Remuneration not obligatory
LT	Article 10, Law on Employment Article 81, Labour Code	Variable legal status There are employment contracts for some OMT traineeships, but traineeships without an employment contract (voluntary traineeships) are possible	At least minimum wage if conditions are met Minimum wage applies where an employment contract exists
LV	There are no specific legal provisions on OMT traineeships in Latvia	Variable legal status Employment contracts exist for some forms of OMTs ("bilateral apprenticeships") but traineeships without an employment contract (voluntary traineeships) are possible	At least minimum wage if conditions are met Minimum wage applies where an employment contract exists

## STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Relevant legislation/documentation	Labour market status of trainee	Remuneration
LU	Labour Code (Articles L. 152-5 et seq.)	No legally defined status	Requirement but lower than minimum wage or comparable worker if conditions are met 1) for traineeships lasting less than 4 weeks: no compulsory compensation; 2) for traineeships above 4 and up to 12 weeks has to be at least 40 percent of the minimum wage for unskilled employees; 3) For traineeships above 12 and up to 26 weeks, remuneration cannot be lower than 75 percent of the minimum wage for unskilled employees; 4) If the trainee graduated with a bachelor's degree, s/he is entitled to the full minimum wage for skilled employees.
MT	Employment and Training Act	Variable legal status	At least minimum wage if conditions are met Trainees are considered to be employees if they have an employment agreement in place but unpaid traineeships are possible
PL	Law of 17 July 2009 on graduate traineeships	Variable legal status	Remuneration not obligatory
PT	Decree-Law no. 66/2011	Other legally defined status Traineeship contract	Requirement but lower than minimum wage or comparable worker if conditions are met Remuneration is mandatory (except in the case of very short traineeships, which cannot exceed three months. 8% of minimum wage.
RO	Law no. 176/2018 on internships	Other legally defined status Dependent work relationship	Requirement but lower than minimum wage or comparable worker 50% of minimum wage
SE	There is no specific regulation on OMT traineeships	Other legally defined status	Requirement on remuneration in some cases, level unclear
SI	Employment Relationship Act	Employee status	AT least minimum wage Remuneration: 70% of pay of regular comparable worker and at least MW (Article 141 of the ERA)
SK	No - Special provision: Employment relation	Variable legal status	Remuneration not obligatory

**Table 34: Legal provisions on status and remuneration - MPT**

MS	Relevant legislation	Labour market status of trainee	Remuneration
AT	For the traineeship for attorney-at-law the Attorneys' Code ( <u>Rechtsanwaltsordnung</u> – RAO) in § 2 Lawyers with the courts: ( <i>Rechtspraktikant:innen</i> ), the relevant legislation, the Legal Trainees Act ( <u>Rechtspraktikantengesetz</u> – RPG). For notaries public in training the Notaries Act ( <u>Notariatsordnung</u> –	Various statuses Attorney-at-law: at least five years of full-time employment. Lawyers: status sui generis under public law (very similar to employee status) Notaries: employment relationship. Medical doctors: employment relationship	Legal requirement for remuneration Medical doctors: Remunerated Legal professions: Remunerated

STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Relevant legislation	Labour market status of trainee	Remuneration
	NO) in § 117. For the traineeship of medical doctors the Medical Doctors' Act ( <u>Ärztegesetz</u> 1998 – <u>ÄrzteG</u> 1988) (§ 6a, 7, 8 <u>ÄrzteG</u> 1988) For judges in training the Act on Judges and Prosecutors ( <u>Richter- und Staatsanwaltschaftsdienstgesetz</u> – RStDG) For civil engineers (§ 6 Act on Civil Engineers – <u>Ziviltechnikergesetz</u> )	Judges: all provisions that apply to judges also apply to judges in training. Civil engineers: at least three years either in an employment relationship or under a free-service contract, as a self-employed person or in public service	
BE	Various legal sources	Various statuses  Medical GP and specialists: "sui generis" status, not an employment contract (Appeal Labour Court Brussels, 18 February 2021, JTT 2018, p. 188.) Legal (lawyer): a compulsory self-employed internship for three years. The trainee must pass the additional professional training and participate in cost-free legal aid ('pro deo'). Accounting: at least three years and must include at least 1 000 hours of auditing assignments each year. The trainee auditor may be an employee or self-employed Architect: mandatory period of up to 4 years maximum as self-employed	Legal requirement for remuneration  Medical GP: limited salary (done through a separate non-profit association) Medical specialist: Hospital is the employer. Collective agreement about the minimum salary (around EUR 3 100 per month) (Royal Decree of 9 July 2021). Lawyer: Flemish trainee lawyer receives a minimum annual fee of EUR 24 000 the 1st year, at least EUR 30 000 from the second year. For French-speaking trainee lawyers at the 'Ordre des barreaux francophones et germanophone' (OBF), the monthly amount is approx. EUR 1 333 for the first year, EUR 1 511 for the second year, and approx. EUR 1 888 for the third year. Accounting: fee of the self-employed auditor trainee is freely agreeable Architect: Minimum hourly fee starts at EUR 13,92 and increase every 6 months
BG	Teacher: Ordinance on uniform State requirements for acquiring higher education with professional qualification of 'teacher' of the year 1995; Pharmacist: Ordinance on the uniform State requirements for acquiring higher education in the specialty of Pharmacy for educational and qualification degree of Master of the year 2005; Nurse: Ordinance on the unified State requirements for acquiring higher education in the specialties of Nurse, Neonatal Nurse and Medical Assistant for educational and qualification degree of Bachelor of the year 2005; Health Care Management: Ordinance on the unified State requirements for acquiring higher education in the specialty of Health Care Management for the educational and qualification degrees of Master and Bachelor in the professional field of Public Health of the year 2006; Kinesitherapy: Ordinance on the unified State requirements for acquiring higher education in the specialty of Kinesitherapy for the educational and qualification degrees of Bachelor and Master in the professional field of Public Health of the year 2011; Lawyer: Ordinance on the uniform State requirements for acquiring higher education in the specialty of Law and professional qualification of Jurist of the year 2022, etc. - Chapter XVII JL With the exception of the traineeship for acquiring legal capacity,	No legally defined status The legal basis/contractual form of most MPTs is not regulated	No legal requirement for remuneration Lawyer: no remuneration, not counted as contributory service Pharmacist: labour and social security consequences are not regulated In most cases, labour and social security consequences are not regulated, including remuneration

## STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Relevant legislation	Labour market status of trainee	Remuneration
	the legal basis of the other forms of training is not regulated		
CY	There are many professions that mandatory part of professional training such as doctors, nurses, lawyers, social workers, psychologists etc. There are no traineeships which are mandatory for accessing certain professions that do not fall under employment law	Employee status	Legal requirement on remuneration
CZ	Attorneys (see Act No. <a href="#">85/1996 Coll.</a> , on Advocacy) Judges (see Act No. <a href="#">6/2006 Coll.</a> , on Court and Judges) Notaries (see Act No. <a href="#">358/1992 Coll.</a> , Notary Code) Bailiffs/executors (see Act No. <a href="#">120/2001 Coll.</a> , Executive Code) Medical professions (see Act No. <a href="#">95/2004 Coll.</a> , on the conditions of gaining professional capacity to perform work of doctor, dentist, or pharmacist).	Employee status Such traineeships are performed under the Labour Code (in an employment relationship).	Legal requirement on remuneration Employee protection and remuneration is expected given employment status.
DE	Traineeships mandatory for accessing specific professions are regulated by special laws: for example, referendar (a candidate in preparatory service for the career of the higher civil service, e.g. school teacher). In the preparatory service for lawyers, they are now in a training relationship under public law in most Länder.	Sui generis status	Legal requirement on remuneration Teachers: Remunerated Lawyers: Remunerated Medical professions: Remunerated
DK	Mandatory traineeships are employment and covered by general employment and social security law. All persons working in offices, with sales or with clinical work are covered by the Salaried Employees Act Barristers: Danish Administration of Justice Act ( <i>retsplejeloven</i> ) Psychologists: Danish Act on Psychologists, section 2(1)	Employee status  Barristers: 3 years as employees Psychologists: practical education of 2 years – as an ordinary employee Real estate dealers: 2 years of traineeship Medical: public employment	Legal requirement on remuneration Barristers: Remunerated Psychologists: Remunerated Real estate dealers: Remunerated Medical doctors: remunerated based on collective agreement Accountants: remunerated based on individual agreement
EE	Medical professions: University of Tartu Act Notaries: Notaries Act Attorneys: Bar Association Act	Various statuses Medical professions: employment contract Notaries: Contractual form not specified Attorneys: 3 years; usually under employment contract but not specified in regulation	Legal requirement on remuneration Medical professions: remuneration regulated by Minister of Social Affairs Notaries: Remunerated. Amount of remuneration will be determined by the general meeting of the Chamber of Notaries Attorneys: Remunerated
EL	Lawyers: Greek Lawyers' Code	Various statuses Medical doctors: one-year obligatory rural medical service (internship) for residency training, employment status Lawyers: No employment status	Legal requirement on remuneration only for some types Medical doctors: Remunerated Lawyers: remuneration not mandatory – depends on the parties' agreement
ES	Doctors and other health professionals: <a href="#">Royal Decree 1146/2006</a> Judges: <a href="#">Acuerdo de 25 de octubre de 2000, del Pleno del Consejo General del Poder Judicial, por el que se aprueba el Reglamento 2/2000 de Jueces Adjuntos</a> ; RD 775/20 and the relevant Judicial Studies Programme regulation Lawyers: not labour law, but education: RD 775/2011 and L 15/2021	Various statuses Doctors and other health professionals: sui generis relationship – 1-year contract that can be renewed Judges and public prosecutors: not workers nor civil servants but probationary officials – duration undefined: between open competition exam and assumption of all responsibilities Lawyers: mandatory traineeship as part of master's degree -- not considered workers	Legal requirement on remuneration only for some types Doctors and other health professionals: basic wage same as regular staff + different supplements based on responsibilities Judges and public prosecutors: Remunerated but no full wage until they become civil servants after they successfully complete the traineeship. Lawyers: unpaid
FI	Legal careers: Act on Court Training (Laki tuomioistuinharjoittelusta, 674/2016, <a href="https://www.finlex.fi/fi/laki/ajantasa/2016/20160674">https://www.finlex.fi/fi/laki/ajantasa/2016/20160674</a> )	Legal careers: Insufficient data Pharmacist: employment relationship, set by collective agreement	Legal requirement on remuneration only for some types Legal careers: Remunerated



STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Relevant legislation	Labour market status of trainee	Remuneration
FR	<p>Medical doctors: Article L.6153-1 French Code of Public Health</p> <p>Public accounting: <u>Arrêté du 19 janvier 2022</u></p> <p>Legal profession (lawyers): <u>Accord professionnel relatif aux stagiaires des cabinets d'avocats ; Décret no 91-1197</u></p> <p>Teachers : primary (<u>Arrêté du 22 août 2014 - 1</u>) secondary (<u>Arrêté du 22 août 2014 - 2</u>)</p> <p>Architects : <u>Arrêté du 10 avril 2007</u> (the terms 'mise en situation professionnelle' is used instead of traineeship)</p>	<p>Various statuses</p> <p>Doctor: sui generis relationship</p> <p>Public accountant: employee; 3 years</p> <p>Lawyers: insufficient data</p> <p>Teachers: Public servant trainee ('fonctionnaire stagiaire') ; 1 year</p> <p>Architect : Employees (fixed term or open ended contract; <u>ordre des architectes - point 4b</u>)</p>	<p>Legal requirement on remuneration only for some types</p> <p>Doctors: Wages are determined similarly as for civil servant</p> <p>Public accountant, Architect: at least MW.</p> <p>Lawyers: between 60 and 85% of the MW (Art. 2). The remuneration is not to be considered a wage (Art. 5)</p> <p>Teacher: First level of relevant pay scale (<u>remuneration</u>)</p>
HU	<p>Decree of Minister for Justice No 5/1991, Article 2.</p> <p>Legal professions: Act 78 of 2017 on solicitors, Article 62.</p> <p>Medical professions: Government Decree No. 162/2015 on vocational training in the medical profession; Act 100 of 2020 on health service relationship</p> <p>Accounting: Act LXXV of 2007</p>	<p>Employee status</p> <p>Legal professions: Employment relationship</p> <p>Medical professions: Employment relationship</p> <p>Accounting: Employment relationship (or relationship in the nature of an employment relationship)</p>	<p>Legal requirement on remuneration</p> <p>All remunerated (amount not regulated but statutory MW applies)</p>
HR	<p>Medical professions: <u>Government Decree No. 162/2015 on vocational training in the medical profession</u>; Act 100 of 2020 on health service relationship; Article 6(1) of Act 122 of 2019 on <u>social security entitlements</u></p> <p>Legal profession: Act on Trainees in Judicial Bodies and on the Bar Exam - <i>Zakon o vježbenicima u pravosudnim tijelima i pravosudnom ispitu</i> (Official Gazette No 14/2019);</p> <p>Public service: Civil Servants Act - <i>Zakon o državnim službenicima</i> (Official Gazette Nos 92/2005, last amended 141/2022), Articles 45(2), 47(2), 53(2), 54(1), 61.a; Act on Servants and Employees in Local and Regional Self-Government - <i>Zakon o službenicima i namještenicima u lokalnoj i područnoj (regionalnoj) samoupravi</i> (Official Gazette Nos 86/2008, 61/2011, 4/2018, 96/2018, 112/2019), Articles 85-93;</p> <p>Social Welfare: Regulations on Traineeship and Professional Exam in Social Welfare - <i>Pravilnik o pripravničkom stažu i polaganju stručnog ispita u djelatnosti socijalne skrbi</i> (Official Gazette No 148/2022);</p>	<p>Various statuses</p> <p>As a rule, the traineeship is based on an employment contract but there is also a possibility of concluding an agreement that does not constitute an employment contract (in this case, provisions of Labour Act nevertheless still apply)</p>	<p>Legal requirement on remuneration</p> <p>All remunerated, full set of labour rights including minimum wage applies.</p>
IE	<p>Medical professions: <u>section 88 of the Medical Practitioners Act 2007</u>; European Communities (Organisation of Working Time) (Activities of Doctors in Training) Regulations 2004 (<u>S.I. No. 494 of 2004</u>)</p> <p>Solicitors: regulation 19 of the Solicitors' Apprenticeship and Education Regulations (<u>S.I. No. 546 of 2001</u> as amended by <u>S.I. No. 503 of 2019</u>).</p>	<p>Various statuses</p> <p>Medical professions: Employment contract</p> <p>Solicitors: Training contract (employment contract optional but not required, in practice often defined as employee)</p>	<p>Legal requirement on remuneration</p> <p>Medical professions: Remunerated (amount not specified)</p> <p>Solicitors: National minimum hourly rate of pay (but Law Society recommends Living Wage)</p>
IT	<p>Each professional order has specific rules for the traineeship</p> <p>Medical professions: Post Lauream Traineeship ex DM 445/2001</p> <p>Legal traineeships: law 31 December 2012 No. 247 (articles 40-45) and the implementing decree of the Minister of Justice No. 70 of 17 March 2016</p>	<p>Various statuses</p> <p>Doctors: Three month traineeship with no employment contract, then three year specialization period, largely equalised to an employment relationship</p>	<p>Legal requirement on remuneration</p> <p>Doctors: No remuneration for three month traineeship, specialization period is remunerated</p> <p>Lawyers: "adequate remuneration" required after first six months</p> <p>Accountants: compensation required after first six months</p>
LT	<p>Doctors: State Gazette, 1996, No.102-2313</p>	<p>Various statuses</p>	<p>Legal requirement on remuneration only for some types</p>

## STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Relevant legislation	Labour market status of trainee	Remuneration
	Legal professions: the Law on Advocacy, Law on Notaries, State Gazette, 1992, No. 28-810, Law on Bailiffs, State Gazette, 2022, No.53-2042	Doctors: Fixed-term employment contract Legal professions: Notaries and bailiffs have an employment contract, advocates do not have employee status (considered self-employed)	Doctors: Remunerated (Statutory coefficient multiplied by MMA, increasing with each year of residency) Legal professions: Advocates not remunerated (self-employed); notaries and bailiffs remunerated, no special regulation
LV	Law on Professional Education, Regulation No.785 'Procedure of organisation of professional training and insurance of the trainees' and Regulation No. 484 'Procedure on organisation and implementation of studies in working environment' Medical residency: Regulation No.685 'Enrolment and assignment of residents and procedure of financing of residency'	Various statuses Status not specifically regulated, usually organised on basis of tripartite agreement Medical residency: Employment status Legal careers: Self-employed	Legal requirement on remuneration only for some types Medical residency: Remunerated (rules on MW apply), salary cannot be lower than lowest monthly salary in salary rules for medical personnel Otherwise no right to remuneration, depends on agreement between parties
LU	Legal professions: <u>Règlement grand-ducal du 10 juin 2009 portant organisation du stage judiciaire et réglémentant l'accès au notariat, amended in 2012 and 2013</u> ; Art. 25 de la <u>loi du 2 septembre 2011</u> réglémentant l'accès aux professions d'artisan, de commerçant, d'industriel ainsi qu'à certaines professions libérales Architects: Art. 15 de la <u>loi du 2 septembre 2011</u> réglémentant l'accès aux professions d'artisan, de commerçant, d'industriel ainsi qu'à certaines professions libérales ; Health professions: various texts compiled in the " <u>Health Code</u> " ( <i>Code de la santé</i> ).	No legally defined status None of the regulatory texts specify the legal status of trainees	Legal requirement on remuneration only for some types No right to remuneration/MW but in some professions there are allowances Doctors: Monthly training allowance Medical personnel in training: Compensation Lawyers: State-paid allowance (150 EUR per month) Accounting: no specific rules
MT	Frequently governed by collective agreements of certain professions	Various statuses Medical professions: employment status (via collective agreement) Lawyers: No employment status	Legal requirement on remuneration only for some types Medical professions: Remunerated Lawyers: Not remunerated
NL	Lawyers: Attorney Act Medical professions: Governed by different collective agreements including the <u>Collective Agreement on Hospitals</u> and the <u>Collective Agreement on University Medical Centres</u>	Employee status Lawyers: Employment contract Medical professions: Employment contract	Legal requirement on remuneration Lawyers: Remunerated Medical professions: Remunerated
PL	Medical professions: Law of 5 <sup>th</sup> December 1996 on the profession of a medical doctor and dentist Legal professions: Law of 26 <sup>th</sup> May 1982 on the Bar; Law of 6 <sup>th</sup> July 1982 on Attorneys at law; Law of 14th February 1991 on notaries; Law of 23rd January 2009 on National School on Judiciary and Public Prosecution ; Law of 22nd March 2018 on judicial officers	Various statuses Medical professions: Fixed-term employment contract Advocates and attorneys: Can be employed on the basis of an employment contract, in practice civil law contracts occur as well; self-employment also possible Notaries: Employment contracts Judges and public prosecutors: No employee status Judicial officers: Employment contract (civil law contracts also used in practice)	Legal requirement on remuneration Medical professions: Remunerated Advocates and attorneys: Entitled to MW, unless self-employed; trainees have to pay a yearly fee for training Notaries: Remuneration (entitled to MW); training fee paid by trainee Judges and public prosecutors: Scholarship Judicial officers: Entitled to MW; Training fee
PT	Usually regulated by the bylaws of professional associations	Sui generis Doctors: In practice, future medical doctors do a medical internships which takes place in the framework of an employment contract	Legal requirement on remuneration Usually not remunerated Doctors: Traineeship grant (in practice, employment contract with remuneration) Accountants: Remunerated Note: the recently approved <u>Act no. 12/2023</u> introduced some amendments to <u>Act no. 2/2013</u> , which contains the legal framework of the creation, organization and functioning of public professional

## STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Relevant legislation	Labour market status of trainee	Remuneration
			associations. Pursuant to this amendment professional traineeships shall now be remunerated under the terms defined in the bylaws of each professional association. The bylaws still have to be modified by the legislator.
RO	Medical, dental and pharmaceutical residencies: <u>Government Ordinance No 18/2009</u> <u>Legal professions:</u> Law no. 51/1995 on the organization and exercise of the legal profession <u>Architects:</u> Article 14(1) of <u>Law No 184/2001</u> on the organisation and practice of the profession of architect Accountants: <u>Government Emergency Ordinance no. 65/1994</u> on the organisation of the accounting expertise and licensed accountants' activity	Various statuses Medical, dental and pharmaceutical residencies: Employment contracts Legal professions: No employee status (but special training contract) Architects: Employment contract Accountants: No employee status	Legal requirement on remuneration only for some types Medical, dental and pharmaceutical residencies: Remunerated Legal professions: Remunerated Accountants: Not remunerated
SE	Medical doctors: <u>National Board of Health and Welfare's regulations and general advice on public service for doctors</u> ; relevant <u>collective agreements</u> Legal professions: Notarieförordning (1990:469) and collective agreements	Employee status Medical doctors: Fixed-term employment contracts Legal professions: Employment relationship	Legal requirement on remuneration Medical doctors: Remunerated (collective agreement) Legal professions: Remunerated: (Collective agreement)
SI	Legal professions: State Legal Exam Act Medical professions: Health Service Act Teachers: Organisation and Financing of Education Act	Various statuses Legal professions: Employment contract or "voluntary traineeship" with a written agreement that is not an employment contract (and only limited application of labour law) Medical professions: Employment contract Teachers: Employment contract	Legal requirement on remuneration Legal professions: Dependent on employment status Medical professions: Salary according to public sector salary scale Teachers: Salary according to public sector salary
SK	Legal professions: <u>Act No. 586/2003 Coll.</u> On the Legal Profession Medical professions: Article 33 paragraph 4 of the <u>Act No. 578/2004 Coll.</u> About health care providers, health workers, professional organizations in the health sector	Employee status Legal professions: Employment relationship Medical professions: Employment relationship	Legal requirement on remuneration Legal professions: Remunerated Medical professions: Remunerated

**Table 35: Legal provisions on status and remuneration - ECT**

MS	Category	Relevant legislation/documentation	Labour market status of trainee	Remuneration
AT	(1) and (2)	- Traineeships are part of secondary vocational education (Berufsbildende mittlere Schulen and Berufsbildende höhere Schulen): - School Organization Act (Schulorganisationsgesetz) - Compulsory training Act (Ausbildungspflichtgesetz)  In higher education, traineeships are mentioned in: § 3 (2) 3 - University of Applied Sciences Act § 78 (2) 1 - University Act	Variable legal status  - No legal status for trainees - the status is determined by the nature of the work relationship: 1) Employee (most likely situation; Chamber of commerce practical guide) 2) Training (administrative interns - Section 1a Contractual Public Employees Act)	Depending on status and/or contract type  - In an employment relationship (chamber of commerce practical guide): 1) trainee falls within the scope of CBA but no specific provision for trainees => remuneration is based on wage regulations set in the CBA 2) trainee falls within the scope of CBA and specific provisions exist

## STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Category	Relevant legislation/documentation	Labour market status of trainee	Remuneration
		-Administrative intern in Federal government - Section 1a Contractual Public Employees Act	3) Volunteer	3) trainee falls within the scope of CBA but specific exclusion provision or trainee does not fall under the scope of the CBA => No pay requirement (no MW) - No pay requirements for training and volunteer contracts - Administrative interns are remunerated 50% or 100% of an entry level employee's wage - Section 1a Contractual Public Employees Act
BE	(1)		Other legally defined status	Remuneration not obligatory
	(2)		Student	- Reimbursement of certain expenses (e.g. travel) is possible - Education provider usually offer scholarships
BG	(1)	- Vocational secondary education is primarily organised around dual training and apprenticeships - Past project to support internships: BG05M2OP001-2.006-0001	-	-
	(2)	1) Higher Education Act 2) ORDINANCE on Student Internships in the State Administration 3) Project BG05M2OP001-2.013-0001 "Student practices - Phase 2"	Employee status	Remuneration not obligatory  Scholarships of BGN 600 for successful trainees (Project BG05M2OP001-2.013-0001).
CY	(1)	- Apprenticeships or vocational training in (schools') centres	-	-
	(2)	- Post-secondary vocational education - Precise regulations in Higher education are set at University level	No legally defined status	Depending on status and/or contract type  - Unpaid unless the traineeship is considered an employment relationship
CZ* => (1) includes post-secondary vocational	(1)	- Education Act 561/2004 Coll. § 65 for upper-secondary vocation education - Education Act 561/2004 Coll. § 96 for post-secondary education - Section 229 of the Labour Code	Other legally defined status  Student (but legal provisions of the Labour Court on working hours, safety and health at work, and other on care, women and juveniles apply)	Depending on status/contract type of the trainee  1) productive activity then min. level is 30% of the MW for full-time work (Education Act 561/2004 § 122) 2) training activity then no pay requirements (traineeship guideline, Chamber of Commerce of the Karlovy Vary Region: <a href="https://www.khkkk.cz/prirucka-practicke-vyucovani-zaku/">https://www.khkkk.cz/prirucka-practicke-vyucovani-zaku/</a> )
	(2)	- Higher Education Act and § 6 and § 44 - Universities set their own regulation regarding traineeships with the limits of the law	Other legally defined status  - Student but conditional on the nature of the work (i.e. dependent work)	Depending on status/contract type  - If dependent work then minimum wage applies - No pay requirements otherwise
DE	(1)	- Vocational Training Act (Berufsbildungsgesetz - BBIG)	Variable legal status	Depending on status/contract type
	(2)	- Act Regulating a General Minimum Wage (Mindestlohngesetz – MiLoG) covers trainees with the exclusion of (Section 22): 1) Traineeships part of vocational or tertiary education of a duration shorter than 3 months, whether mandatory or voluntary (points 1. and 3.). 2) Voluntary internships for career orientation (Point 2. -	- Under the BBIG, individuals are considered trainees - Student for mandatory traineeships < 3 months	- Trainees under the BBIG: 1) Min. level define in § 17 (620 Euros for a first year trainee in 2023, + 40% for a fourth year trainee) 2) Can fall below this level if provision in CBA - § 17 (3) 3) § 17 (4) is unclear (defines a max. level?) - MW for trainees covered by the MiLoG

STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Category	Relevant legislation/documentation	Labour market status of trainee	Remuneration
		<p>See also Circular D5-31005/1#13 1.2 for a description of these traineeships)</p> <ul style="list-style-type: none"> <li>- In general, Upper-secondary (also 'tertiary') vocational traineeships fall under the scope of the BBIG (BBIG, §3).</li> <li>- Voluntary (including orientation) traineeships fall under the BBIG § 26 - Circular D5-31005/1#13, 3.2</li> <li>- Higher education institutions (e.g. Universities) can include traineeships in their curricula - University Framework Act (HRG), §10 (2) - and fall under the scope of the MiLoG if &gt; 3 months</li> <li>- Circular D5-31005/1#13 (check if referencing is correctly done) for traineeships in Federal institutions</li> <li>- Only 'unregulated' ECT are mandatory traineeships of duration &lt; 3 months</li> </ul>		<ul style="list-style-type: none"> <li>- For trainees in Federal institutions falling outside the scope of the CBA (TVöD) and MiLoG (Circular D5-31005/1#13):</li> <li>1) min. level is 300 euros for compulsory trainee (450 euros from January 2024 - Circular D5.31005/1#15)</li> <li>2) For voluntary trainees under the BBIG, the host can determine whether the level defined under BBIG § 17 is appropriate</li> <li>-No pay requirements for mandatory ECT &lt; 3 months</li> </ul>
DK	(1)	- Vocational secondary education is primarily organised around dual training and apprenticeships	-	-
	(2)	<ul style="list-style-type: none"> <li>1) Legislative Decree No. 1343 for upper secondary education (Erhvervsakademier and professionsbachelor)</li> <li>2) Legislative Decree No. 778/ Executive order No. 2285 for higher education</li> </ul>	<p>Variable legal status</p> <ul style="list-style-type: none"> <li>- Not a worker if unpaid (section 4 Executive order 2672; Order no 830)</li> </ul>	<p>Remuneration not obligatory</p> <ul style="list-style-type: none"> <li>1) Unpaid unless stated otherwise in an educational order (Executive order 2672). Host companies can offer a compensation of maximum DKK 3375 (2023 level) which is not to be considered a salary.</li> <li>2) Unpaid and paid traineeships ( Legislative Decree No. 778). Unpaid trainees are eligible to a lump sum of maximum DKK 3375 not to be assimilated to wage income (Order no 830)</li> </ul>
EE* => (1) includes post-secondary vocational education	(1)	<ul style="list-style-type: none"> <li>- Vocation Educational Institutions Act, 2013; The procedure for implementing workplace-based learning, 2014</li> <li>- Vocational Education Standard, 2013 § 3 (3) and Higher Education Act § 21 and § 5 (2) - Professional higher education institutions</li> </ul>	<p>Variable legal status</p> <ul style="list-style-type: none"> <li>- No legal definition of a trainee</li> <li>- Status depends on pay and subordination</li> </ul>	<p>Depending on status/contract type</p> <ul style="list-style-type: none"> <li>- No pay requirement but remuneration possible (cannot be lower than MW if granted - § 6 of The procedure for implementing workplace-based learning, 2014)</li> <li>- Yes, if in addition to the internship agreement, an employment contract is signed (§ 6 of The procedure for implementing workplace-based learning, 2014)</li> </ul>
	(2)	- Higher Education Act § 20 and § 6 (1) - Universities		Depending on status/contract type
EL* (IEK take place over the secondary and post-secondary level and is included in (1))	(1)	<ul style="list-style-type: none"> <li>-Vocational secondary education is organised primarily around apprenticeships since 2017 reform. (<a href="https://www.cedefop.europa.eu/en/tools/vet-in-europe/systems/greece-u2">https://www.cedefop.europa.eu/en/tools/vet-in-europe/systems/greece-u2</a>)</li> <li>- Vocational training institutes (IEK - Act 4186/2013 Art.23) - traineeships take place primarily in post-secondary education</li> </ul>	No legally defined status	Remuneration not obligatory
	(2)	<ul style="list-style-type: none"> <li>- Act 4957/2022 Art. 69 and 73:</li> <li>1) Technological Education Institutes</li> <li>2) Universities</li> </ul>	No legally defined status	<p>Depending on status/contract type</p> <ul style="list-style-type: none"> <li>- min.level is 80% of MW for a full-time position (40 hours) in the private sector - Act 4957/2022 Art. 69 7.</li> </ul>

## STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Category	Relevant legislation/documentation	Labour market status of trainee	Remuneration
FI	(1)	- Act on vocational training 531/2017	Other legally defined status  Trainees under a Training contract are not employees (Act on vocational training 531/2017 Section 71)	Remuneration not obligatory
	(2)	- Government Decree 1129/2014 on Universities of Applied Sciences - Government Decree 794/2004 on Degrees at the Universities	Variable legal status  Student or employees depending on the nature of the work	Depending on status/contract type  - If employees then CA provisions apply - No pay requirements otherwise
ES	(1)	RD 659/2023 on the vocational training system and the development of dual training. In theory, traineeships are not impossible but most company placements are likely to be apprenticeship (Art. 51.6 RD 659/2023)	-	-
	(2)	- RD 659/2023: post secondary and non-tertiary vocational training (apprenticeships and traineeships possible). - RD 1791/2010; RD 822/2021; RD 592/2014 for HEI traineeships - RD 822/2021 Art. 22 on integration of vocational training within university studies	No legally defined status  - Vocational education: A training contract (Art. 11 of RD 2/2015) may be signed. - HEI: The formative nature of the internship implies that the traineeship will not, in any case, result in obligations inherent to an employment relationship (Art. 2.3 RD 592/2014) - HEI dual: Workers with a training contract (Art. 22 of the RD 822/2021) as defined in Art. 11.3 of RD 2/2015.	Depending on status/contract type  - Vocation education: Yes as per Art. 11.2 or 11.3 of RD 2/2015 - either established in applicable CBA or through specific computations (11.2.m and 11.3.i respectively) . Remuneration may not fall under a specified level. - HEI: No but possible on a voluntary basis. Scholarship (becas) can be used to finance the placement. - HEI dual: Yes as per Art. 11.3 of RD 2/2015.
FR	(1)	1) Vocational upper-secondary ('Lycée professionnel'): - Education Code Art. L124-1 to L124-20 - Decree n° 2023-765	Other legally defined status  Student	Remuneration provided requirements on length are met and lower than MW
	(2)	Post-secondary and higher education: - Education Code Art. L124-1 to L124-20 - Education Code Art. D611-13 to D611-20 - Gap year ('Année de césure' -Art. L124-1 to L124-20 apply except when related to compulsory education requirements)		-Compulsory 'gratification' if traineeships last longer than 2 months (consecutives or over an academic year - Art. L124-6): 1) From CBA if it exists 2) Min. level: 15 % of the social security hourly 'ceiling' (SSHC - 4.05 euros in 2023). It does not constitute a salary. -Partial reimbursement of transport expenses and meal tickets (Education Code Art. L124-13) -For 'Lycée professionnel', new daily allowance with a max. level and possibility to cumulate it with the 'gratification' (Arrêté du 11 août 2023)
HU	(1)	Dual training - primarily apprenticeships	-	-
	(2)	-Article 44. of the Act No. 204 of 2011 on National Higher Education and the Government Decree 230/2012 (VIII. 28.)	Variable legal status  Trainees do not have the employee status but all provisions of the labour code apply (Section 44 of the Act No. 204 of 2011 on National Higher Education and also section 17 of Government Decree 230/2012)	Remuneration provided requirements on length are met and lower than minimum wage  - Yes if continuous practice of more than 6 weeks or dual training - 65% of MW (Section 44 paragraph 3 of the Act No. 204 of 2011 on National Higher Education). - Traineeship can be unpaid in public administration but the trainee is nonetheless covered by all provisions from the

STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Category	Relevant legislation/documentation	Labour market status of trainee	Remuneration
HR* => (1) includes post-secondary vocational student	(1)	- Law on Vocational Education (Zakon o strukovnom obrazovanju) Art. 3, 7. and Art. 24	Not applicable	labor code (Section 44 paragraph 3a of the Act No. 204 of 2011 on National Higher Education) Depending on status and/or contract type  - Paid unless specified in a specific regulations - Law on Vocational Education Art. 31. - The min. level is based on the average net salary in the previous year: 1) 10% for first year student 2) 20% for second year student 3) 25% for other year
	(2)	- Law on the performance of student affairs ("Zakon o obavljanju studentskih poslova") for student work which appears to be the legal framework for traineeships in HEI. - Law on Higher Education and Scientific Activity ("Zakon o visokom obrazovanju i znanstvenoj djelatnosti")	Not applicable	Depending on status and/or contract type  - MW divided by 160 (in HRK) for student work
IE	(1)		No legally defined status	Depending on status and/or contract type
	(2)			- No pay requirements unless employee status
IT	(1)	- Ministerial Decree 142/98 of 25 March 1998, Art. 1 - D33Article 1 of Resolution 199/2013	Other legally defined status  - Student - "Tirocini curricolari" are performed by students enrolled at University at an undergraduate level.	Remuneration not obligatory
	(2)			
LT	(1)	Law on Vocational Education and Training Law on Higher Education and Research	Variable legal status  Employee status under tripartite apprenticeship, no employee status under professional traineeship	Depending on status and/or contract type
	(2)			Minimum wage under tripartite apprenticeship, no obligatory remuneration under professional traineeship
LV		-Law on Professional Education (Article 7(4)) - Subsidiary Cabinet of Ministers Regulations.	Variable legal status  Does not have status of an employee, has only 'educatee' status in line with Article 1(12) Education Law, but employee status possible if so specifically agreed between the parties involved.	Remuneration not obligatory  Student traineeships do not give an employee status (person maintains the status of 'educatee'), hence there is no obligation to pay remuneration.
LU	(1)	- Vocational training Act ("Loi du 19 décembre 2008 portant réforme de la formation professionnelle") Art. 17 - Labour Code Art. 111-2 - Existence of very short traineeships (Stages de l'orientation scolaire ou professionnelle or Schnupperstagen)	Other legally defined status  - Student	Remuneration not obligatory
	(2)	- Student traineeships (stage conventionné) are a compulsory training with a host company located in	- Does not have status of an employee - Labour Code Art. 152-10	Remuneration provided requirements on length are met and lower than minimum wage

STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Category	Relevant legislation/documentation	Labour market status of trainee	Remuneration
		Luxembourg, as part of the education or training provided by a Luxembourg or foreign secondary or higher education establishment.		- The remuneration depends on the duration (Labour Code Art. 152-4): 1) If the traineeship lasts less than four weeks: compensation is optional; 2) if it lasts for four weeks or more: compensation corresponds to at least 30% of the minimum social wage for unskilled workers. 3) no remuneration if imposed by education institution Remuneration not obligatory
MT => (1) includes post-secondary vocational (covered by the Work-based Learning and Apprenticeship Act, 2018)	(1)*	-Work-based Learning and Apprenticeship (WLA) Act, 2018 - Young Persons (Employment) Regulations, 2004 - Education Act, 1988 for (Post-)secondary vocational education: 1) Art. 132 Institute for Tourism Studies (ITS) 2) Art. 89 (1) for the Malta College of Art, Science and Technology (MCAST)	Variable legal status  - The WLA Act, 2018 schedule 2 defines three types of contracts (work placement, apprenticeships and internship) - Only apprenticeship contract implies employee status (point B. (3) of schedule 2) - Interns are not employees unless paid	-No pay requirement for an internship contract which can be paid or not (WLA Act, 2018 schedule 2)"
	(2)	-Education Act, 1988 - Internships part of curricula - University of Malta (only public university) propose work-based programs but outside the curriculum: 1) No ECTS but acknowledged on the diploma; e.g. Degreeplus - ( <a href="https://www.um.edu.mt/knowledgetransfer/placements">https://www.um.edu.mt/knowledgetransfer/placements</a> ): 2) University does not sign the agreement but encourages it and provides a template (more OMT?)	Other legally defined status  -Student	Remuneration not obligatory  - Unpaid (no JobPlus declaration required and provisions of the Educational and Training Services Act, 2019 do not apply)
NL	(1)	- Vocational training act Article 7.2.8. Professional practical training - Internship pact for MBO - <a href="https://www.rijksoverheid.nl/documenten/rapporten/2023/02/14/stagepact-mbo">https://www.rijksoverheid.nl/documenten/rapporten/2023/02/14/stagepact-mbo</a> - MBO can offer dual training and not only internship (BBL)	Other legally defined status  - Student	- From 2023, all MBO students will receive an allowance that should cover at least expenses (e.g. travel). - All relevant CBA should specify the minimum level for the allowance. - See Internship pact for MBO goal 4.
	(2)	- Higher Education and Scientific Research Act, Article 7.3.1 - Traineeships in higher vocational education (HBO) - F - Curricular traineeships in Universities are regulated at University/faculty level (e.g. - Extra-curricular (non-credited) traineeships are possible but require approval from the Universities (Still ECT given/if tripartite agreement?) - Internships in government institutions are opened to upper-secondary (MBO) and tertiary education students - Circular Policy Framework for the legal position of trainees in the government sector (Circulaire Beleidskader rechtspositie stagiairs bij de sector Rijk) -	Variable legal status  - Trainees in higher education are student as are trainees in gvt bodies (Circular Appendix 1 Art. 16 of the agreement template) - If the student performs "regular work" then the traineeship should take place under an employment contract ( <a href="https://business.gov.nl/regulation/work-placement-interns/">https://business.gov.nl/regulation/work-placement-interns/</a> )	Depending on status and/or contract type  - No pay requirements unless specified in CBA, but usually an allowance (or fee) is granted ( <a href="https://business.gov.nl/regulation/work-placement-interns/">https://business.gov.nl/regulation/work-placement-interns/</a> ; <a href="https://www.hbo-stagemarkt.nl/voor-studenten/stagevergoeding/">https://www.hbo-stagemarkt.nl/voor-studenten/stagevergoeding/</a> ) - If regular employee then MW applies. - For traineeships in gvt > 1 month : 1) Expense allowance of EUR 628 for a full-time position (40 hours), indexed every year - Circular point 4. (EUR 748 in January 2023 - <a href="https://www.p-direkt.nl/informatie-rijkspersoneel-2020/mijn-werk/loopbaan-en-">https://www.p-direkt.nl/informatie-rijkspersoneel-2020/mijn-werk/loopbaan-en-</a>



STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Category	Relevant legislation/documentation	Labour market status of trainee	Remuneration
		henceforth the Circular		ontwikkeling/specifieke-doelgroepen/stage-informatie-voor-stagiairs) 2) Reimbursement of accommodation (point 5.) and travel (point 6.)
PL	(1)	Poland lacks any regulations for curricular traineeships in secondary and tertiary education.	No legally defined status	Remuneration not obligatory
	(2)	In the absence of laws of general applicability: Universities determine their own traineeship programs		
PT	(1)	- Organised around dual training and apprenticeships	-	-
	(2)	- Traineeship regulations are set by universities	Other legally defined status  - Student	Remuneration not obligatory
RO	(1)	Law no. 258/2007, published in the Official Gazette no. 493 on July 24, 2007 (hereinafter referred to as Law 258/2007).		
	(2)	Law no. 258/2007, published in the Official Gazette no. 493 on July 24, 2007 (hereinafter referred to as Law 258/2007).	Other legally defined status  - Student - During their practice, students do not have an employment contract; their status is related to the field of education.	Remuneration not obligatory - H47An exception is when the practice partner hires the trainee, in accordance with Art. 21 of Law No. 258/2007. In this case, the trainee will receive at least the minimum wage.
SE	(1)	- Education Act (2010:800), Chap. 18, § 11; Upper secondary school regulation (2010:2039). - Upper secondary school regulation (2010:2039). Chap. 16, § 11a defines a training contract for apprenticeships. - Apprenticeship definition is loose (see column I) such that some apprenticeships are likely to be traineeships (depending on organisation of the curriculum) - Outside apprenticeships (i.e. workplace placement of less than 50% of the study time), vocational secondary schools can include traineeships in their curricula	Other legally defined status  - Student unless (fixed-term) contract is signed - Provision of the Work Environment Act (1977:1160) defined in Chap. 1 § 3 apply (e.g. health and safety, working time)	Remuneration not obligatory  - No pay requirements unless specific provisions in CBA (rarely the case since traineeship is considered a training/education experience)
	(2)	- Adult Education Ordinance (2011:1108), Chap. 2, § 3 and § 27 (kommunal vuxenutbildning) - University of Applied Sciences Ordinance (2009:130), Chap. 2, § 2 - Higher Education Ordinance (1993:100) Chap 6 , § 7		
SI	(1)	- Vocational Education Act,	Other legally defined status	Remuneration not obligatory  - Students usually do not receive payment for the mandatory work practice. -The student may be entitled to a payment, depending on internal regulations, collective agreements, etc. -No MW
	(2)	- the Higher Education Act - Higher Vocational Education Act	- Student	
SK	(1)	- Act No. 245/2008 Coll. on Nurture and Education (Education Act)	Other legally defined status	Remuneration provided requirements on length are met and lower than minimum wage

## STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Category	Relevant legislation/documentation	Labour market status of trainee	Remuneration
		- Amendment and Supplementation of Certain Acts, as amended ('Education Act')	Pupils do not have the employee status. Their status is regulated by the acts regulating education (Education Act, Act on VET).	- Paid by the school or employer - in the amount of at least 50% of the hourly minimum wage (considering the quality of the work and the pupil's behaviour) - Section 27 paragraph 1 and 2 of the Act on VET Compensation for the trainee (e.g. travel expenses):it is optional -MW:- remuneration is linked to the statutory minimum wage (Act on Minimum Wage); -at least 50% of the hourly minimum wage, considering the quality of the work and the pupil's behaviour (Section 27 paragraph 1 of the Act on VET)
	(2)	Act No. 131/2002 Coll. on Higher Education and on Amendments and Additions to Certain Acts, as amended ('Act on Higher Education').	Other legally defined status  - Students do not have the employee status. Their status is regulated by Act on Higher Education.	Remuneration not obligatory

Note: (1) = 15-18/19 years old corresponding, in general, to upper-secondary education (2) = More than 18/19 years old corresponding to post-secondary and tertiary education. "gvt" stands for government. A blank cell indicates that no information could be gathered.

**Table 36: Restrictions on consecutive traineeships and duration - ALMP**

MS	Restrictions on consecutive traineeships	Restrictions on duration	Aligned with 'reasonable duration' principle – six months
BE	No data	Does not exceed six months (no data on specific provisions)	Yes
BG	No restrictions	Up to 6 months, except for the dual education system.  Contracts under Art. 233B LC - 6-12 months.	Partially – depending on contract
CZ	No restrictions	Does not exceed six months (no data on specific provisions)	Yes
DE	No restrictions	No restrictions	No
DK	No restrictions	Revalidering – maximum of five years, but should be as short as possible.  Virksomhedspraktik – The maximum depends on the limitations of the one individual, and can be 4 weeks, 13 weeks or up to 26 weeks.  Ansættelse med løntilskud –limited to 6 months with private employers and 4 months with public employers.	Partially
EE	No restrictions	Does not exceed six months (no data on specific provisions)	Yes
IE	No restrictions	No restrictions	No
EL	No data	Up to 50% of the total duration of the CVT programme; aka max. 400 hours	Yes
ES	No restrictions	Non-labour trainees - 3 - 9 months.	No

STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Restrictions on consecutive traineeships	Restrictions on duration	Aligned with 'reasonable duration' principle – six months
FR	No data	Does not exceed six months (no data on specific provisions)	Yes
HR	No restrictions	12 or 24 months, depending on the type of education	No
IT	No restrictions	Training and orientation traineeships - up to 6 months.	Partial
		Work placement and reintegration traineeships - up to 12 months.	
		Traineeships for the disadvantaged - up to 12 months.	
CY	No restrictions	Traineeships for the disabled - up to 24 months.	No
		No restrictions	
LV	No data	No restrictions	No
LT	No restrictions	Tripartite apprenticeship - up to the expiry of the training contract.	Partial
		Vocational training - depends on the program	
LU	CAE (Contrat d'appui-emploi) and CIE (Contrat d'initiation à l'emploi) - extension or conclusion of a new contract with another promoter requires approval of the Director of ADEM.  CRE (Contrat de reinsertion-emploi)- no regulations.  Stage de professionnalisation - extension or conclusion of a new contract possible for highly qualified persons.	Internship - up to 6 months. CAE and CIE - up to 12 months	Partial
		CRE - up to 12 months.	
		Stage de professionnalisation - up to 6 weeks.	
HU	NA	NA	NA
MT	No data	Not all programmes require a limitation of six months (no data on specific provisions), depends on contract/programme	Partial
NL	No restrictions	No restrictions	No
AT	No restrictions	No restrictions	No
PL	Traineeship for the unemployed - only once with the same organiser in the same job.  Professional preparation of adults - no restrictions.	Traineeship for the unemployed - up to 6 months, with exceptions.	Partial
		Practical training for a profession - 6-12 months.	
PT	New traineeship can only take 12 months after the conclusion of the previous one. As a rule, traineeship lasts 9 months, non-renewable.	Work learning - 3-6 months.	No
		As a rule 9 months, 12 months in the case of certain groups.  In specific cases - 6, 9 or 12 months.	

## STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Restrictions on consecutive traineeships	Restrictions on duration	Aligned with 'reasonable duration' principle – six months
	Additional conditions to be met by a trainee who benefited from a state-subsidised traineeship and wants to access a new one.		
RO	No restrictions but funding available only once for the same trainee.	Up to 6 months	Yes
SI	NA	NA	NA
SK	Allowance for Graduate Practice - cannot be repeated. Education and Training of Jobseekers for the Labour Market - no restrictions.	Allowance for Graduate Practice traineeships - 3-6 months. Education and Training of Jobseekers for the Labour Market - no restrictions.	Partial
FI	No restrictions; even encouraged	'Työkokeilun' = up to 12 months; Not clear if only form of ALMP	No
SE	Restrictions for consecutive traineeships with the same employer	"Yrkesintroduktionsavtal" = at least 6 months, max 12 months.	No

**Table 37: Restrictions on consecutive traineeships and duration - OMT**

MS	Restrictions on consecutive traineeships	Restrictions on duration	Aligned with 'reasonable duration' principle – six months
BE	No data	Does not exceed six months (no data on specific provisions)	Yes
BG	No restrictions	Up to 6 months, except for dual education system.	Partially – depending on contract
CZ	No restrictions	For contracts regulated by Art. 233B LC - 6-12 months. DPP - up to 300 hours per calendar year.	Partially – depending on contract
DE	No restrictions	DPC - up to 52 weeks. No restrictions, but the longer the traineeship, the greater the risk that it will be classified by court as an employment relationship (resulting in application of the general rules on the limitation of employment relationships).	No
DK	No restrictions	No restrictions	No
EE	No restrictions	No restrictions	No
IE	No restrictions	6-20 months	No
EL	No restrictions	No restrictions	No
ES	No restrictions	Labour trainees - up to 3 years (5 years in case of persons with disabilities). Voluntary trainees - no restrictions	No
FR	NA	NA	NA
HR	No restrictions	No restrictions	No

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

MS	Restrictions on consecutive traineeships	Restrictions on duration	Aligned with 'reasonable duration' principle – six months
IT	No restrictions	No restrictions	No
CY	No restrictions	No restrictions	No
LV	No restrictions	No restrictions	No
LT	Voluntary traineeship - completed once with the same organisation. Voluntary traineeships can be concluded maximum three times for a total duration of six months.  Bilateral apprenticeship - another contract of this type no sooner than 3 years after the termination of the previous one.	Voluntary traineeships - up to 2 months per calendar year. total period of up to 6 months.  Bilateral apprenticeship - up to 6 months.	Yes
LU	No restrictions	6 months within a 24-month period with the same training supervisor	Yes
HU	Student employment contract - no restrictions.  Employment with a scholarship - allowed once.	Restrictions (no specific data on provisions)	No data
MT	No restrictions	No restrictions	No
NL	No restrictions	No restrictions	No
AT	No restrictions	No restriction	No
PL	No restrictions	Up to 3 months	Yes
PT	No restrictions	Up to 12 months, in some cases may be extended up to 18 months	No
RO	Internship - one contract between the same parties.	Up to 720 hours over 6 consecutive months	Yes
SI	No restrictions	Up to 1 year, with exceptions	No
SK	Restrictions based on general labour law.	No restrictions	No
FI	Restrictions if demonstrative of permanent demand for labour	Up to 12 months, even across multiple contracts.	No
SE	Restrictions for consecutive traineeships with the same employer	Up to 12 months, after that fixed-term contracts automatically convert into permanent contracts	No

**Table 38: Restrictions on consecutive traineeships and duration - MPT**

MS	Restrictions on consecutive traineeships	Restrictions on duration	Aligned with 'reasonable duration' principle – six months
BE	No data	Legal traineeships - 3 years. Auditor traineeships - at least 3 years. Architect traineeships - up to 3 years.	No

## STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Restrictions on consecutive traineeships	Restrictions on duration	Aligned with 'reasonable duration' principle – six months
BG	No restrictions	Restrictions exist (no data on specific provisions)	No data
CZ	No restrictions	No restrictions	No
DE	Medical, legal: completed only once	No restrictions	No
DK	Medical traineeships - no restrictions. Legal and accountant traineeships - completed only once.	Medical – minimum in line with education, no specific legislative restrictions Legal, accountant – no restrictions	No
EE	No restrictions	Medical traineeships – restrictions Legal and accountant traineeships - no restrictions	No
IE	No restrictions	No data	No data
EL	No data	Legal traineeships - no restrictions	No
ES	Medical and legal traineeships - no restrictions. Judges and public prosecutors traineeships - regulated by course providers.	Medical traineeship - until finishing the educational programme. Lawyers' traineeships - up to collecting 30 ECTS. Judges and public prosecutors traineeships - restrictions.	No
FR	No data	No data	No data
HR	No data	No data	No data
IT	No restrictions	Medical: 3 months Legal: 18 months	Partial
CY	No restrictions	No restrictions	No
LV	No restrictions	No restrictions	No
LT	No restrictions	Medical traineeship - 3-7 years, depending on the specialisation. Legal traineeships - 2 years.	No
LU	Traineeship to be completed only once	Medical traineeships - 3-6 years, depending on the specialisation. Legal traineeship - 12 months or 2 years, depending on the specialisation Accountant traineeships - 3-7 years, depending on the profession.	No
HU	No restrictions	Restrictions (no data on specific provisions)	No data
MT	No restrictions	No data	No data
NL	No restrictions	Medical traineeship - depends on the university, approx. 2 years. Legal traineeship - 2 or 3 years. Accountant traineeship - at least 3 years.	No
AT	No restrictions	Restrictions only on minimum duration	No
PL	Medical traineeships - no restrictions, however, some additional rules with regard to the timing of completion of a postgraduate traineeship. Legal traineeships - no restrictions.	Medical traineeship - at least 12 months Legal traineeships - depends on the profession	No
PT	No restrictions	Medical traineeship - 12 months. Legal traineeship - 18 months. Accountant traineeship - up to 18 months.	No

## STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Restrictions on consecutive traineeships	Restrictions on duration	Aligned with 'reasonable duration' principle – six months
RO	No restrictions	Medical traineeship - 3-7 years, depending on the specialisation Legal traineeship - 2 years Accountant traineeship - 3 years.	No
SI	Medical, teachers' and legal traineeship - may be taken only once.	Healthcare professionals and doctors' traineeship - 6 months. Dentists - 1 year. Teachers - up to 10 months, depending on the level of education. Legal traineeship - 2 years.	No
SK	Medical and accountant traineeships - no restrictions. Legal traineeships - restrictions based on general labour law provisions.	Medical traineeship - depends on the specialisation Legal traineeship - 3 years. Accountant traineeship - at least 2100 hours	No
FI	No restrictions	Medical traineeship – no restrictions Legal traineeships – two six month periods of traineeship	No
SE	No restrictions	Medical traineeships – 18 month traineeship Legal traineeships – 24 month traineeship (can be 30 month in some cases)	No

**Table 39: Restrictions on consecutive traineeships and duration - ECT**

MS	Restrictions on consecutive traineeships	Restrictions on duration	Aligned with 'reasonable duration' principle – six months
BE	No data	No restrictions	No
BG	No restrictions	Up to 6 months, except for dual education system.	Partial
CZ	No restrictions	Contracts under Art. 233b LC - 6-12 months. Restrictions (no specific data on provisions)	No data
DE	No restrictions	No restrictions	No
DK	No restrictions	Limitation depends on the regulation regarding the specific education, i.e. no universal restrictions on duration	No
EE	No restrictions	No restrictions	No
IE	No restrictions	No restrictions	No
EL	No restrictions	No restrictions	No
ES	No restrictions	No restrictions	No
FR	No data	No data	No data
HR	N/A	N/A	N/A
IT	No restrictions	Four months for secondary school Six months for students	Partial

## STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

MS	Restrictions on consecutive traineeships	Restrictions on duration	Aligned with 'reasonable duration' principle – six months
		12 months university students	
CY	No restrictions	No restrictions	No
LV	No restrictions;	Restrictions depending on agreement	No
	In practice mostly only done once		
LT	Tripartite apprenticeship - another contract of this type no sooner than 3 years after the termination of the previous one.  Professional traineeship - depends on the study program.	Tripartite apprenticeship - up to 6 months  Professional traineeship - depends on the education program	Partial
LU	No restrictions	6 months within a 24-month period with the same training supervisor	Yes
HU	Student employment contract - no restrictions.  Vocational training employment contract - once a year.	Vocational training employment contract - (for the duration of the specialised training, or 4 - 12 weeks.	Yes
MT	No restrictions	No restrictions	No
NL	No restrictions	No restrictions	No
AT	No data	Restrictions (max four years)	No
PL	No restrictions	No restrictions	No
PT	As a rule - should be taken only once.  Less strict rules for voluntary traineeships.	No restrictions	No
RO	No restrictions	1 week - 12 months, depends on the program	No
SI	Mandatory work practice - completed only once (N/A)	No restrictions	No
SK	No restrictions	No restrictions	No
FI	No restrictions	No restrictions	No
SE	No restrictions	No restrictions; organised by school/university	No



## Annex 2. Synopsis report

The consultation activities included a survey with national stakeholders and interviews with EU level stakeholders, presented successively below.

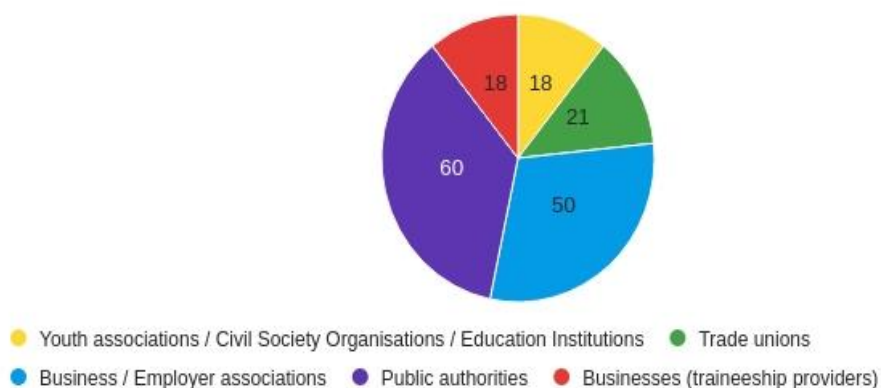
### Annex 2.1. Survey

In the following, we present the insight from the study conducted with national stakeholders, aiming to collect information on the current practices of businesses regarding traineeships, as well as to identify relevant national measures and their impact on the quality of traineeships.

#### Annex 2.1.1 Overview of respondents

A total of 173 responses were received from all 27 EU Member States and four non-EU countries (Albania, Iceland, Moldova, and Norway). A total of 97% (167) of respondents agreed to participate in the survey and 3% (6) rejected to participate. Once agreed, the 167 respondents chose their stakeholder category which determined the questionnaire they would answer, with different questions tailored to the type of respondent. As shown in Figure 51, among the 167 respondents who agreed to participate, 11% (18) were businesses (traineeship providers), 36% (60) were public authorities, 30% (50) were business / employer associations, 13% (21) were trade unions and 11% (18) were youth associations / civil society organisations / education institutions. The high response rate from public authorities is due to the strong dissemination campaign in this category.

Figure 51: Distribution of stakeholder categories



Among the business respondents (traineeship providers), three companies were active in professional, scientific, and technical activities, three in industry (except construction), two in wholesale and retail trade, transport, accommodation and food, two in construction, and the remaining ones in finance and insurance, public sector & administration, education, consulting, food industry or personnel services. Regarding the size of the companies, 11 have over 250 employees, four have between 51-250 and three have less than 10 employees. In total, 16 out of the 18 companies have or had trainees in the last five years, including 10 who had ECT, five who had OMT, two who had MPT and one who had ALMP trainees.

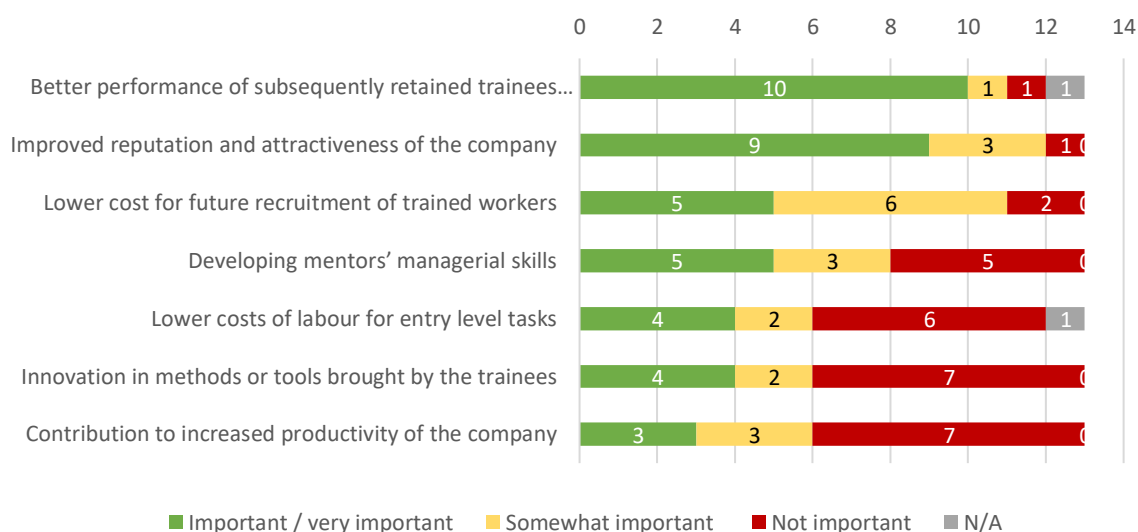
## Annex 2.1.2 Outcomes of online survey

### Traineeship practices and problematic use of traineeships

The survey investigated the practices of traineeship providers and their perception of the benefits of having trainees. Regarding the average share of trainees out of the total number of employees in the last five years, nine out of the 13 companies that responded had between 0-10% of trainees out of total workers, three had between 11-20% and one did not know. Two companies did not have trainees in the last five years and the remaining three companies did not answer.

Regarding the reasons why companies hired trainees, the majority (77%, or 10 out of 13 recorded responses) mentioned **it was for training trainees who could potentially be hired after the traineeship**. Two companies also mentioned the connection with a university that may provide a pool of further recruits. As shown in Figure 52 below, regarding the benefits of having trainees, the majority of companies mentioned **a better performance of subsequently retained trainees compared to new hires** (10 out of 13, or 77%) or improved reputation and attractiveness of the company (9 out of 13, or 69%) as being important or very important. Interestingly, 7 out of 13 companies (54%) said that neither the contribution to increased productivity of the company nor the innovation in methods or tools brought by the trainees were important. Similarly, less than half, or 6 out of 13 companies (46%), believed that lower costs of labour for entry-level tasks were somewhat important, important, or very important.

Figure 52: Benefits of having trainees



Note: Based on the question: 'What are the benefits of having trainees for your company?' (N=13)

Business associations were also asked about the benefits of having trainees for employers and similarly, the majority (63% or 31 out of 49) pointed to the better performance of subsequently retained trainees compared to new hires for the same role, 53% (26 out of 49) mentioned the improved reputation and attractiveness of companies, and 43% (21 out of 49) cited the lower cost for future recruitment of trained workers. On the other hand, only 22% of respondents (11 out of 49) cited lower costs of labour for entry-level tasks as a benefit of having trainees.

The prevalence of consecutive or recurrent traineeships can be an indicator of the misuse of traineeships. Regarding the possibility of offering recurrent (at least two consecutive)

traineeship possibilities at companies for the same person or the same role, 5 out of 12 (42%) and 4 out of 12 (33%) companies that answered said only under certain circumstances, respectively. In addition, 3 out of 12 companies said never for both the same person or role, and 2 out of 12 companies said always for both the same person and role, respectively. The remaining respondents did not know. The reasons given why companies offered recurrent traineeship possibilities were because of the cheaper labour force, the belief that trainees could become future employees, because of pre-established agreements or because of the performance of trainees.

The length of traineeships, and especially the prevalence of long-duration traineeships, can be another signal of the misuse of traineeships. In the survey, among the business respondents that had OMT, 2 out of 15 had them between 4 and 6 months, one respondent for up to 3 months and one respondent for more than 12 months, while the rest didn't know or didn't reply. Among the businesses that had ECT, more than half (6 out of 10 companies) indicated that they are contracted only for up to 3 months, one for 4-6 months and one for more than 12 months, while the rest did not reply or didn't know. Among the two businesses that had MPT, one had them for up to 3 months while the other did not answer. The business that had ALMP trainees had traineeship contracts of 4 to 6 months.

Analysing the share of trainees that were hired on average in the last five years in the company after their traineeship ended, 7 out of 12 companies that answered said between 0-20% were hired, two companies said between 21-40% and another two companies said between 61-80% of trainees were hired. The remaining respondent did not know.

When asked which activities were implemented in their countries to raise awareness of employers, including SMEs, on the QFT and any national measures on the quality of traineeships, publications on public authorities' websites were most commonly mentioned (by 50% or 29 out of 58 public authorities, 41% or 20 out of 49 business associations, 50% or 10 out of 20 trade unions, and 44% or 7 out of 16 youth associations/universities). The second most mentioned initiative was outreach/communication of public authorities to business associations and trade unions (mentioned by 34% or 20 out of 58 public authorities, 33% or 16 out of 49 business associations, 25% or 5 out of 20 trade unions, 31% or 5 out of 16 youth associations/universities). The other types of awareness-raising activities mentioned were outreach/communication of employer organisations to businesses, public information campaigns, and workshops and events. Interestingly, between 13% and 25% of respondents (9 out of 58 public authorities, 10 out of 49 business associations, 5 out of 20 trade unions, 2 out of 16 youth associations/universities) indicated that no awareness-raising activities were implemented in their country.

Regarding the effectiveness of the abovementioned activities, most respondents replied that these measures have been effective in raising awareness of employers to a moderate extent (44% or 17 out of 39 business associations, 25% or 4 out of 16 trade unions, 57% or 8 out of 14 youth associations/universities). While some trade unions mentioned that there was increased awareness with social partners and the public, some business associations regretted that some of these activities were too 'high level' and did not reach all employers. According to some respondents from youth associations/CSOs/universities, relevant success factors for raising awareness included combining online and offline channels, using several forums, and establishing long-term collaborations between universities and traineeship providers. On the other hand, some respondents regretted the lack of information to students and noted the need to repeat the information to companies. Among the surveyed businesses, 8 out of 12 companies believed publications on public authority websites were an 'ineffective' or 'very ineffective' initiative to raise employers' awareness about how to achieve good quality traineeships, whilst 7 companies believed public information campaigns were 'ineffective' or 'very ineffective'. On the other hand, 8

business respondents believed “outreach/communication of employer organisations to businesses” was ‘effective’ or ‘very effective’.

Considering how national measures on quality of traineeships are enforced in their country, most respondents replied that it was through inspections (21% or 12 out of 58 public authorities, 26% or 12 out of 47 business associations, 19% or 4 out of 21 trade unions, 47% or 7 out of 15 youth associations/universities), followed by complaints received (14% or 8 out of 58 public authorities, 6% or 3 out of 47 business associations, 10% or 2 out of 21 trade unions, 20% or 3 out of 15 youth associations/universities). By contrast, between 16 and 35% of respondents believed that no enforcement mechanism existed in their country (16% or 9 out of 58 public authorities, 23% or 11 out of 47 business associations, 43% or 9 out of 21 trade unions, 20% or 3 out of 15 youth associations/universities). Regarding the inspections, a Greek respondent mentioned that these are conducted once per month at an undisclosed time for the employer and the trainee. A Portuguese respondent explained that at least once during the internship period, a senior staff / teacher from the school visits the internship location of each student, to check with their tutor how this is unfolding, in the dimensions of personal behaviour (punctuality, attendance, presentation, ...) and professional behaviour (technical performance, autonomy, flexibility, proactivity, teamwork, meeting deadlines). According to a Finnish respondent, the Regional Administrative Agency will inspect the work-based learning place if necessary. The complaint systems reported by respondents consist of open communication channels of universities where students or parents can report any complaints.

Regarding the collection of data on traineeships, ALMP is reported as being the most monitored (by 49% or 26 out of 53 public authorities, 36% or 17 out of 47 business associations), followed by ECT (38% or 20 out of 53 public authorities, 36% or 17 out of 47 business associations). MPT is monitored to a smaller extent (according to 32% or 17 out of 53 public authorities, 26% or 12 out of 47 business associations) and OMT even less (according to only 11% or 6 out of 53 public authorities, 13% or 6 out of 47 business associations). Overall, most public authority respondents specified that the data collected is limited to the number of trainees and administrative data. Business associations reported that for ALMP, the data is collected by the Public Employment Service while data on ECT tends to be collected by the educational institutions and ministries of education. An Italian respondent explained that for both OMT and ALMP, the data is collected by the Ministry of Labour and concerns the trends, activations, terminations, the reference professions of the traineeships, the outcomes, the employment placement rates and the characteristics of the employment following the internship experience.

Regarding the replacement of regular employment by traineeships, most respondents considered that it was not common in their country (according to 45% or 23 out of 51 public authorities, 59% or 26 out of 44 business associations, 40% or 8 out of 20 trade unions, 38% or 5 out of 13 youth associations/universities). Between 22 and 38% of respondents believed that it was somewhat common (31% or 16 out of 51 public authorities, 25% or 11 out of 44 business associations, 20% or 4 out of 20 trade unions, 38% or 5 out of 13 youth associations/universities). Only a minority of respondents believed that it was very common in their country (namely 1 out of 51 public authorities - from Bulgaria, 2 out of 44 business associations - from Bulgaria and Croatia, 6 out of 20 trade unions - from Belgium, Bulgaria, Croatia, Denmark, Poland, 2 out of 13 youth associations/universities - from Hungary and Portugal). The rest of the respondents did not know or did not reply.

Respondents were asked which measures in place help reduce the risk that traineeships are used to replace regular employment. In general, respondents agreed with most measures presented in the survey. The measures where most respondents at least somewhat or completely agreed that they help reduce this risk were mandatory remuneration of trainees (86% or 12 out of 14 public authorities, 85% or 11 out of 13

business associations, 35% or 7 out of 20 trade unions, 85% or 11 out of 13 youth associations/universities), followed by a written traineeship agreement stating tasks and responsibilities and arrangements for learning, mentorship, and evaluation (79% or 11 out of 14 public authorities, 77% or 10 out of 13 business associations, 70% or 14 out of 20 trade unions, 77% or 10 out of 13 youth associations/universities), and an obligation to offer some social protection to trainees (e.g., sickness and healthcare benefits, accident insurance etc.) (79% or 11 out of 14 public authorities, 77% or 10 out of 13 business associations, 55% or 11 out of 20 trade unions, 77% or 10 out of 13 youth associations/universities). The cap on the maximum duration of traineeships also received general support, although to a lesser extent than other measures (with 65% or 13 out of 20 business associations, trade unions and 62% or 8 out of 13 youth associations/universities respectively that at least somehow or completely agree). Finally, when asked what other measures are in place in respondents' countries to prevent the replacement of regular employment by traineeships, respondents mentioned specific laws, rules, and regulations to avoid the abuse of traineeship contracts and ensure work contracts are established and respected. Concerning what other measures not yet in place in respondents' countries could be useful to prevent the replacement of regular employment by traineeships, a public authority suggested that educational establishments should check the composition and professional relevance of the tasks to be carried out by the student in relation to the training. Some trade unions suggested fines for businesses that abuse traineeship contracts and denying the opportunity to train for those businesses that are repetitive offenders. One trade union suggested increasing the knowledge and education of young people about their rights and another trade union suggested increased supervision.

### Traineeships of poor quality

Poor working conditions, such as a lack of adequate **remuneration** and access to social protection, can be evidence of poor-quality traineeships. All surveyed companies that had OMTs and ALMPs paid a salary, including one company that provided further compensation to OMTs. On the other hand, only 1 out of the 2 companies that had MPT paid a salary, and only 2 out of the 10 companies that had ECT paid salaries, with 3 companies providing some other type of compensation and the remaining 3 not providing any remuneration to students. Regarding **social protection**, 4 out of 5 companies that had OMTs, the company that had an ALMP, and 7 out of 10 companies that had ECT, gave a mix between maternity and paternity benefits, sickness and healthcare benefits, entitlement to unemployment benefits after the traineeship, accident insurance benefits, and pensions contributions. The remaining one out of 5 companies that had OMTs, 3 out of the 10 companies that had ECT, and both companies that had MPT gave no social protection to their trainees.

Regarding why companies give benefits (remuneration or social protection) to trainees, the most common reason was because of a **mandatory requirement by law** (3 out of the 5 companies with OMTs, the company with ALMPs, both companies with MPT, and 3 out of the 10 companies with ECT), followed by the **minimum duration of the traineeships** (2 out of the 5 companies with OMTs and 3 out of the 10 companies with ECT), and finally because of the respective importance of tasks/responsibilities (1 company with OMTs and 1 company with ECT). Moreover, regarding how much monetary remuneration companies provide to trainees, the majority did not specify, and the ones that did give mixed results between minimum wage and above or below minimum wage.

Most business respondents (8 out of 15 companies) said they would **take the same number of trainees if mandatory remuneration of trainees was enforced** in their countries, three companies said they would take fewer trainees and one company said they would take more trainees. The remaining three companies did not know. Moreover, 7 out of 15 companies said they would take the same number of trainees **if a mandatory requirement to set remuneration at minimum wage was enforced** in their countries,

two said they would take more trainees and one company said they would take fewer. The remaining five respondents did not know. Finally, 6 out of 15 companies said they would take the same number of trainees if **mandatory provision of social protection** to trainees was made compulsory in their countries, one company said they would take fewer trainees and one company said they would take more. The remaining seven companies did not know.

When asked the extent to which the **tasks of trainees differed from the tasks of entry-level employees, around half said they are 'somewhat different' or 'very different'** (2 out of the 5 companies with OMTs, the company with ALMP, 6 out of the 10 companies with ECT and 1 out of the 2 companies with MPT). The remaining companies said tasks are "the same". The main reasons given were that trainees needed a more in-depth introduction and guidance on the tasks to be carried out, meaning that tasks were 'lighter' or easier than those of entry-level workers.

**Half of business respondents (6 out of 12 companies) offer mentors to trainees.** For 4 out of 6 companies that offer them, the role of the mentor is to provide training and guidance to enhance skills, and for another four companies, the mentor's role is to provide explanations to the trainee on the requested tasks. For two companies the mentor's role is for providing feedback to the trainee and for one company, it is for providing coaching and advice for the trainee, e.g., on recruitment opportunities within the company. Two companies said mentors spend less than 1 hour per week on trainees, another two companies said they spend over 3 hours and the remaining two companies said they spend over 4 hours per week. Most respondents (11 out of 12 companies) believe that giving clear instructions and following up with a supervisor is the best way to ensure that trainees acquire the skills needed in companies. Moreover, half of respondents (6 out of 12 companies) believed that defining the learning and training objectives at the beginning of traineeships was equally one of the best ways to ensure trainees acquire the correct skills. Finally, two companies believed trainees acquire the correct skills with mentoring by a dedicated person and the remaining two companies believe it is acquired by delivering a skill certificate at the end of the traineeship.

On the same topic, 58% of public authorities (31 out of 53), 55% of business/employer associations (26 out of 47), 25% of trade unions (5 out of 20) and 63% of youth associations/universities (10 out of 16) said that measures were implemented in their countries **to ensure that traineeships are a learning experience** for trainees, whilst the remaining respondents said none existed, were unsure or did not know. At least one type of stakeholder category from every EU country, except Latvia, said measures were in place. Some examples of measures included trainees bounded by a written agreement which outlines the rights and obligations of all parties, a direct link with professional/academic projects and specific laws regulating the goals and objectives of traineeships. Other examples included imposing requirements by universities on the quality of trainee placements, or learning objectives stated in the convention with the university or the Erasmus + agreement. A Finnish respondent indicated that learning at the workplace is done under supervision and based on a contract that defines the competences to be acquired during the traineeship and the roles and responsibilities of the company and the educational institution. A Bulgarian respondent mentioned that a certificate for completed traineeships is issued. Concerning the effectiveness of these measures, 29% of public authorities (9 out of 31), 50% of business associations (13 out of 26), 40% of trade unions (2 out of 5) and 80% of youth associations (8 out of 10) believe to a "great extent" that they are effective to ensure that trainees acquire skills that facilitate their entry into the labour market 52% of public authorities (16 out 31) and 35% of business associations (9 out of 26), believed this to a "moderate extent". The remaining respondents from all categories believed the effectiveness of measures was to a "small extent" or did not know. Regarding who implements these measures, respondents referred to national legislation on traineeships, to the requirements from universities to the traineeship contract or agreement, and to professional mentors.

## Unequal access to traineeships

Concerning **cross-border trainees**, only 4 out of the 12 companies that answered hired trainees from other EU countries and the remaining 8 did not. Those who hired other EU trainees did so by publishing the vacancy on university networks or by publishing the vacancy on EURES.

**To facilitate the take-up of cross-border traineeships**, 36% (19 out of 53) of public authorities, 45% (22 out of 49) of business associations, 45% (9 out of 20) of trade unions and 66% (10 out of 15) of youth associations mentioned **publishing the vacancy on a European job portal** (e.g., Eures). 34% (18 out of 53) of public authorities, 43% (21 out of 49) of business associations, 50% (10 out of 20) of trade unions and 60% (9 out of 15) of youth associations mentioned **publishing the vacancy on universities' networks**. 45% (24 out of 53) of public authorities, 61% (30 out of 49) of business associations, 65% (13 out of 20) of trade unions and 80% (12 out of 15) of youth associations mentioned **using Erasmus + grants**. The remaining respondents did not know or were unsure, and others answered 'other', including encouraging uptake through school networks, creating a European legal framework to give all citizens (including jobseekers) access to traineeships, or making concrete cross-country cooperation agreements. Other respondents mentioned incentives and support for relocation or using headhunting, or publishing vacancies on social media platforms, job search portals, Euractiv, LinkedIn and Eurobrussels.

To improve **accessibility and inclusiveness of traineeships**, 42% (22 out of 53) of public authorities, 64% (30 out of 47) of business associations, 45% (9 out of 20) of trade unions and 56% (9 out of 16) of youth associations said there are measures implemented in their country to improve the accessibility of traineeships to vulnerable groups (e.g., persons with disabilities, from minorities or low economic background). The remaining respondents said no measure existed or did not know. Some measures that were mentioned included quotas of scholarships and traineeships funded by the state for orphans, disabled, national minorities, Roma, refugees, and other vulnerable social groups. Others said that compensation for trainees with a disability is higher than for other youth groups in their countries. Other examples of measures included strong dissemination campaigns by trade unions and incentives for the take-up of disabled and disadvantaged people encouraged through exceptions to the duration limits of the traineeships. One Portuguese respondent mentioned financial support for transport, placement of children in nurseries during the internship and tax benefits to organisations that hire disabled people. Two other respondents mentioned that the Erasmus+ programme gives higher grants to vulnerable groups to take part in Erasmus traineeships abroad.

Regarding the impact of these measures, 55% (12 out of 22) of public authorities, 56% (17 out of 30) of business associations, 55% (5 out of 9) trade unions and 55% (5 out of 9) youth associations believed it increased take-up by a great or moderate extent of persons with disabilities. The remaining respondents believed it increased only to a small extent or were unsure. Moreover, 32% (7 out of 22) of public authorities, 60% (18 out of 30) of business associations, 66% (6 out of 9) of trade unions and 66% (6 out of 9) of youth associations believed specific measures increased take-up of persons with low socioeconomic background by a great or moderate extent. The remaining respondents believed it increased only to a small extent or were unsure. Finally, 18% (4 out of 22) of public authority, 50% (15 out of 30) of business associations, 44% (4 out of 9) of trade unions and 44% (4 out of 9) of youth associations believed specific measures increased take-up of persons from (ethnic, religious, sexual) minorities by a great or moderate extent. The remaining respondents believed it increased only to a small extent or were unsure.

## Other suggestions to improve traineeships

Respondents gave further suggestions on how to improve traineeships in their country or across Europe. One Public Authority suggested establishing a European legislative framework guaranteeing social security rights for people undertaking a work placement outside the context of their studies (**European work placement contract**). Another public authority respondent suggested **financial incentives** for employers, and benefits of diversity and inclusion for employers and employees. Other public authority respondents suggested a **wide informational campaign** to promote and increase the value of traineeships among organisations/enterprises and in society at large so that traineeships are seen as a useful professional tool for gaining working experience. Another public authority respondent suggested **abolishing OMT at the EU level**, supporting Member States in better clarifying the objectives of a traineeship experience, framing and shaping an **EU framework/path under EURES to support the proper development and recognition of a "job mobility traineeship"**, **revising and adapting the QFT** and re-establishing the EC round tables on A&T, involving, for example, representatives from different DG EMPL Units, and on the other side, organisations to continue such thread that joins PES, Edu, VET, Social Partners. A trade union suggested developing **guidelines for the organisation of traineeships**, monitoring the quality of the programmes offered and providing feedback from interns, adding that greater **transparency and accessibility of information** is needed as it is often difficult for interested persons to find information on available internships. Another trade union respondent suggested implementing adequate **monitoring schemes** to ensure that trainees' first working experience is of high quality.

## Annex 2.2. Interviews

In the following, we summarize key insights from the interviews conducted for the study, focusing on the current context and challenges related to the quality of traineeships as well as the impacts of policy options to address these challenges.

### Annex 2.2.1 Context and challenges

#### Skills development

Across all stakeholder groups interviewed – trade unions, employer organizations, youth organizations and European institutions as examples of traineeship providers – the central function of traineeships as a vehicle for skills development was highlighted. It was emphasized that on-the-job learning plays an important function in transmitting skills, which includes job-specific knowledge but also transversal skills, including interpersonal skills. This has benefits for trainees, who develop relevant skills for their future labour market career, but also for companies.

However, some stakeholder groups also highlighted that the extent to which traineeships have sufficient learning content depends on various factors. Trade union representatives and representatives of European institutions as employers highlighted the role of clear learning objectives and mentorship, while employer organizations also emphasized connections between (higher) education and companies, as well as standardization of training, including across countries. Employer organizations also stressed that in some contexts, limited resources (related to staff or budgets) may limit the ability of companies to provide high-quality training.



## Misuse of traineeships

The interviews allowed for the identification of a number of potential indications of misuse of traineeships, which include:

- long duration
- prolongation of a traineeship contract or repeated traineeships
- “recycling” trainees i.e. employers hiring consecutive trainees
- traineeships requiring previous work experience
- a high ratio of trainees relative to employees in a company
- lack of educational content, including the absence of well-defined learning objectives and lack of mentorship/supervision
- trainees being engaged in tasks that are indistinguishable from those of employees

However, there were diverging opinions on the extent to which the misuse of traineeships is a significant issue in European labour markets. According to trade union and youth organization representatives, misuse of traineeships is one of the biggest problems relating to the quality of traineeships, which is observable across countries and sectors, but especially prevalent in OMT and MPT. They asserted that misuse of traineeships is a form of exploitation, which is associated with precarious working conditions and undermines the purpose of traineeships (i.e. to facilitate the transition to the labour market). On the other hand, views on the extent to which misuse of traineeships can be observed in EU Member States were more split among employer associations. It was emphasized that there is a lack of data on the phenomenon, so that the issue cannot be accurately assessed.

## Inspection and enforcement

All stakeholders interviewed emphasized that in principle, labour inspectorates play an important role in ensuring that provisions related to the quality of traineeships are upheld across Member States. Employer association representatives asserted that it was difficult to assess the extent to which inspections are currently working well in different MS, though in principle, inspectorates play an important role, also in providing data on phenomena such as misuse of traineeships. In contrast, trade unions and youth organizations asserted that inspection and enforcement mechanisms were not working well in practice, due to a lack of effective mechanisms for monitoring and enforcement. Reasons for this, it was stated, include inspectorates' lack of financial and legal resources, as well as an imbalance of power between trainees and traineeship providers, which reduces the likelihood that trainees will report malpractice.

## Cross-border traineeships

While the stakeholders interviewed agreed that cross-border traineeships can be a valuable opportunity for young people, it was also emphasized that a number of obstacles to take-up of cross-border traineeships persist. Trade unions and youth organisations particularly emphasized the financial cost associated with taking up a cross-border traineeship, as well as legal issues related for instance to insurance and work permits. Moreover, both trade unions and employer organisations emphasized the importance of recognition of skills and qualifications across borders. Finally, the lack of awareness of cross-border traineeships was also pointed out as a potential inhibiting factor by several stakeholders.

## Remote and hybrid traineeships

The stakeholders interviewed asserted that the COVID-19 pandemic led to a significant increase in the prevalence of remote and hybrid traineeships, which may (partially) persist in the future. However, across stakeholder groups interviewed, it was recognized that remote traineeships pose particular challenges. Specifically, ensuring that remote or hybrid traineeships have the same learning content as regular traineeships is a significant challenge, requiring for instance regular check-ins from supervisors, but also access to sufficient technological equipment. However, there are also some skills, particularly interpersonal skills and other skills that require on-site presence, that cannot be transmitted to the same extent in an online setting, and there are limits to remote traineeships in this regard. Moreover, trade unions and youth organisations emphasized that while remote/hybrid traineeships could potentially increase access for people with disabilities, they cannot be a substitute for reasonable accommodation in the workplace itself. Both youth organizations and employer organisations also stated that the same rules should apply to regular and remote/hybrid traineeships.

## Working conditions and fair compensation

Diverging stakeholder views on the current quality of traineeships with respect to working conditions were observed. Though employer associations noted that in some cases trainees experience inadequate working conditions, they mainly noted that there is a lack of existing data and evidence on which types of traineeships are most problematic, and in which sectors they are located. Some types of traineeships, such as MPTs are already regulated quite strongly. It was also noted that there is strong divergence across Member States in existing regulations so it is difficult to have an overview of existing arrangements. On fair levels of remuneration/compensation, there were diverging views. While some employer associations stated that there should be a level of pay adequate to the tasks that the trainee performs and sufficient to cover living costs, others emphasized that the learning outcomes are the most significant element of a traineeship, rather than the pay.

In comparison, trade unions, youth organizations and European institutions acting as traineeship providers pointed to bad working conditions, and in particular low or lack of pay, as a crucial issue related to the quality of traineeships. It was argued that trainees experience various challenges related to working conditions, including insufficient pay, lack of access to social protection, excessive working hours and uncertainty in legal status. Precarious working conditions are associated with a higher risk of poverty and financial instability. On setting fair levels of remuneration, various options were discussed. While some trade union representatives and youth organizations suggested that trainees should be covered, at a minimum, by the minimum wage, others suggested that fair remuneration levels should be designed and periodically reviewed in accordance with both the cost of living and trainees' tasks.

## Inequalities in access to traineeships

All stakeholders interviewed acknowledged that there are likely inequalities in access to traineeships, particularly high-quality traineeships, in Europe. Employer associations pointed out that these patterns are reflective of broader inequalities across society and the labour market in general, where there is widespread discrimination. It was also noted that companies are generally very supportive of diversity and inclusion, but there may be cases where it is difficult to adapt to the specific needs of a trainee due to the lack of resources, particularly for SMEs. Trade union stakeholders drew attention to the link between inequality in access and pay, as unpaid traineeships mean that trainees have to rely on other resources, such as family support, to support themselves during a traineeship. This increases social inequality, as traineeships are not accessible to

everyone. Moreover, barriers to access for disabled people and for individuals from non-urban areas were also highlighted.

## Annex 2.2.2 Impacts

### Extending the scope of the QFT

Stakeholders pointed out a range of impacts of extending the scope of the QFT. Some trade unions pointed out that an extension would have beneficial impacts on traineeships, by introducing a set of standards for the quality of traineeships, while no costs were identified. However, others opined that the scope extension would only have limited benefits, given the non-binding nature of the Recommendation, and would not address the existing issues with the quality of traineeships sufficiently. Youth organizations also pointed out the benefits of extending the scope of the QFT, as many traineeships take place in education but are currently not covered by quality principles, though the limits of non-binding instruments were also underlined. Views were also split on the side of employer organizations. While one employer organization saw benefits of the scope extension – in terms of increasing the quality of traineeships and investing in trainees as workers and learners – others put a strong emphasis on costs. It was pointed out that an extension of the scope would lead to significant adjustment costs for companies, which may put particular strain on sectors that are already suffering from tight budgets and/or staff shortages. It was also stressed that there may be adverse effects on equality, as better-performing trainees may be selected in order to reduce the time investment needed.

### Actions on misuse of traineeships

Youth organizations interviewed stated that the identification of indications of the misuse of traineeships would be welcome in principle, though difficult to identify in practice. It was also pointed out that action on misuse of traineeships would benefit some trainees, but not address the broader issues relating to quality, such as remuneration. Trade union representatives stated that defining indications of misuse would not be beneficial, as only regulatory action is in principle sufficient to address the issue.

Actions to inhibit misuse of traineeships, including introducing a maximum length of traineeships or a limit on consecutive traineeships, were also met with mixed reactions. Employer organisations stated that these measures could be beneficial, and youth organizations were also in favour, potentially with an exception for MPTs. However, one trade union representative raised concerns, pointing out that action on length or consecutive traineeships would imply a high administrative burden, but a limited benefit, as the scale of the problem with respect to working conditions would only be addressed to a limited extent. It was argued that rather, the fundamental problem is lack of pay, which requires binding regulatory action, with the elimination of misuse following as a by-product (as employers would no longer have an incentive for misuse).

### Increased enforcement and channels for reporting

The stakeholders interviewed agreed that strengthening enforcement and channels for reporting could have benefits, including the enforcement of the existing rights of trainees, increasing trainee awareness of their rights and avenues for legal action, enhancing legal clarity and compliance with EU law, increasing equality of opportunities and ultimately improving the quality and attractiveness of traineeships. However, trade union representatives also stressed that enforcement action will only have limited benefits in the absence of binding quality criteria for traineeships. Youth organizations also noted that the benefit of enforcement channels is limited if the asymmetrical power balance between

trainees and employers persists, as reporting will continue to be limited in practice. On the other hand, employer organizations pointed out that while empowering the labour inspectorate is valuable in principle, it is difficult to know where to target such strengthening action in the absence of good data on traineeship quality.

### Stronger coordination between various social and educational actors

Trade unions, employer associations and youth organizations all agreed that stronger coordination – including stakeholders such as social partners, educational institutions and national authorities at different levels – would have benefits for improving the quality of traineeships. Trade union organizations emphasized, however, that these measures are only complementary to binding action that is needed, in their view, on quality standards for traineeships.

### Improved data collection and monitoring

Across stakeholders, there was agreement that high-quality data on traineeships is still lacking in Europe and that the collection of better data would entail significant benefits, such as improved quality monitoring and assessment. It would also allow a better understanding of the issues involved, and therefore enable more targeted policy action. Youth organisations also emphasized the importance of collecting disaggregated data (e.g. by socio-economic characteristics) and of making the data publicly available.

### Remuneration and social protection

Stakeholders pointed out a range of costs and benefits associated with improved working conditions – including remuneration and social protection – for trainees. Turning first to the former, trade unions and youth organizations largely emphasized the benefits of improved remuneration for trainees. This includes access to social rights for trainees, improved/faster integration into the labour market, increased social inclusion and the elimination of misuse of traineeships (in the case of binding requirements to pay trainees, due to a lack of incentives for employers to misuse traineeships). These stakeholders also identified broader benefits for employers, due to the increased attractiveness of traineeships, and society at large, in the form of increased productivity and tax revenue. However, it was acknowledged that businesses would incur costs.

Employer associations, while recognizing the benefits of quality traineeships, placed stronger emphasis on the costs associated with remunerated traineeships. It was argued that requirements on remuneration would constitute a strong disincentive to provide traineeships, resulting in a reduction in the supply of traineeships. These effects would likely be particularly pronounced for SMEs, who lack financial and administrative resources. This cost would significantly affect trainees, who would have less access to traineeships, and therefore to the labour market. While it was acknowledged that remuneration may be a way to attract trainees to a sector, it was argued that – particularly in a context of limited resources and tight budgets – the disincentive effect to provide traineeships at all would dominate on the business side. Trade unions also acknowledged that (required) remuneration for trainees may result in a reduction of the traineeships offered. However, this potential cost was argued to be less significant than the benefit of eliminating discriminatory and exploitative practices, and ultimately improving the quality of employment. Moreover, trade union representatives argued that in the case of binding requirements on remuneration, some of the current cases of misuse of traineeships would be replaced by regular employment, resulting in better labour market outcomes for trainees.

The same arguments on costs and benefits were also argued to apply to the case of social protection. An additional point made by trade union and youth organization

representatives was that lack of access to social protection has long-term costs for trainees, e.g. by reducing their pension. Ensuring access to social protection would eliminate these costs, as well as have positive impacts on the sustainability of social security systems, by increasing contributions.

## Annex 3. Analytical methods

This Annex is organised as follows: Annex 3.1 presents the data and the methodology used to compute the prevalence of paid and unpaid trainees in the EU. Annex 3.2 displays the baseline projections. Annex 3.3 discusses the methodology for the estimation of problematic traineeships and Annex 3.4 focuses on issues of long duration and consecutive traineeships. Annex 3.5 presents the methodology to estimate the costs of the different policy options. Annex 3.6 and Annex 3.7 provide additional information on, respectively, the stakeholders consultations and the legal analysis. The analysis of vacancies is presented in Annex 3.8 and concludes this Annex.

As explained at the end of Section 2.2.1.1, any evidence at MS level derived from the EU-LFS is not included in this version of the report.

### Annex 3.1. Methodology to estimate the prevalence of traineeships

Quantitative evidence on traineeships in the EU is obtained from scientific use file<sup>280</sup> of the EU Labour Force Survey (EU-LFS). Datasets are available for each MS and access to anonymised files was granted by Eurostat for the duration of the project.

The EU-LFS is the official source for labour market statistics in the EU and presents the advantage of providing (more) harmonised information (compared to e.g. administrative data) on the labour market status of the population aged 15 to 89.

#### Annex 3.1.1 Prevalence of paid traineeships

##### The TEMPREAS variable

The TEMPREAS variable<sup>281</sup> is a structural variable and is therefore only available on a yearly basis. It is asked to employees (STAPRO = 3) who report working on temporary (fixed-term) contracts (TEMP = 2). These filters imply that the restrictions applied to STAPRO and TEMP also apply to TEMPREAS, meaning that only paid fixed-term work experiences are recorded under TEMPREAS.

The main objective of TEMPREAS is to identify the reasons for which an employee reports being on a fixed-term contract. Since 2021, the variable includes the following categories:

1. Could not find a permanent job
2. Did not want a permanent job
3. Fixed-term probationary contract
4. Apprenticeship
5. Training other than apprenticeship (trainees, internships, research assistants, etc.)

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280 Scientific use files are the datasets provided by Eurostat after anonymization of certain information.

281 This brief description is based on: [https://ec.europa.eu/eurostat/documents/EULFS\\_UserGuide\\_2021.pdf](https://ec.europa.eu/eurostat/documents/EULFS_UserGuide_2021.pdf) and much more information on the variable can be found in this document.

6. This type of job is only available with a temporary contract
7. Other reasons
8. Blank / Not stated
9. Not applicable

The fifth category, “Training other than apprenticeship (trainees, internships, research assistants, etc.)” is of interest. This category also includes temporary work arrangements other than traineeships/internships. However, these alternatives are likely to represent a small share of responses given that apprenticeships and traineeships are the two main forms of temporary work arrangements aiming at providing work-based training to individuals<sup>282</sup>.

Before 2016, categories 4 and 5 were merged into category 8, as “a contract covering a period of training (apprentices, trainees, research assistants, etc.)”<sup>283</sup>. Since 2016, however, MS have been able, on a voluntary basis, to record apprenticeships and traineeships as distinct categories. The 14 MS that do so are BE, CY, DE, IE, EE, EL, LV, HU, NL, AT, PL, RO, SK, and FI. Therefore, trainees constitute a different category from apprentices for these **14 MS** over the period **2016-2021**, whilst trainees are directly identifiable in the EU-LFS only in **2021** for the **13 remaining MS**. As a result, the 2021 release of the EU-LFS is the first providing distinct categories **for all MS**.

The methodology to separate and retrieve trainees from apprentices for the years and MS in which TEMPREAS does not distinguish between the two is presented below.

### Missing values imputation procedure for paid trainees

In order to obtain estimates of the number of trainees for the years in which these workers are aggregated with apprentices (i.e. TEMPREAS = 8), we focus on the group of individuals who are either apprentices or trainees (TEMPREAS = 4, 5 when available, or 8). We then use the years in which TEMPREAS is disaggregated (TEMPREAS = 4, 5) to identify differences between trainees and apprentices (e.g. in terms of education level, participation in formal education, duration of temporary contracts) that can be used to separate trainees from apprentices when TEMPREAS is aggregated (i.e. when TEMPREAS = 8). To do so, the problem is framed as one of missing value imputations for the variable TEMPREAS, whereby category 8 (i.e. apprentices and trainees aggregated together) is set to ‘missing’. Imputation methods are commonly used by National Statistical Institutes to replace missing values<sup>284</sup>.

Multiple-imputations (MI) techniques offer a convenient way to address issues arising from missing values. If certain assumptions are met about the distribution of missing values, these techniques also allow for valid estimation and inference. In our setup, the quantity of interest corresponds to the weighted sum<sup>285</sup> of the number of individuals identified as trainees. The discussion below is mainly based on StataCorp (2023)<sup>286</sup> and more detail on the procedure can be found in this document and the references therein.

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282 This is more of claim, which is however in line with most of the research on the topic of work based learning. This literature either focus on apprenticeships or traineeships.

283 Category 8 refers to the transcoded value after the entry into force of the IESS-FR. Before then, apprentices and trainees were aggregated into category 1. See <https://ec.europa.eu/eurostat/documents/Transcodingtables.pdf>.

284 For instance, imputations are used for the Current Population Survey in the U.S. (The U.S. LFS). See <https://www.census.gov/programs-surveys/cps/imputation-of-unreported-data-items>.

285 Using weights provided by the EU-LFS.

286 [StataCorp \(2023\). STATA Multiple-Imputation reference manual release 18. CollegeStation, TX: StataCorp LLC.](#) Henceforth, simply StataCorp (2023).

MI techniques are flexible in that they allow to address missing value issues for a variety of data and missing value patterns<sup>287</sup>. MI proceeds in three steps (StataCorp, 2023):

1. Imputation step. This step aims to replace missing values and is repeated  $M$  times, creating  $M$  completed datasets. Various procedures (imputation model) exist for the imputation of missing values and the model is selected based on different considerations, such as the type of variables to be imputed.
2. Completed-data analysis step. The quantity of interest (i.e. the weighted sum of trainees) is estimated for each imputation  $m = 1, \dots, M$ .
3. Pooling step. The results obtained for each imputation  $M$  are merged into a single result. This step produces the final estimates discussed in the study.

Whilst step one (imputation) involves the principle methodological choices for the entire procedure, it is worth briefly discussing an important assumption that underlies MI techniques, namely, ignorability. Ignorability requires (i) that the missing data is missing at random - i.e. missing values should not depend on any unobserved variables -, and (ii) that the model underlying missing values should be distinct from the model used to identify trainees from apprentices (StataCorp, 2023). Ignorability is difficult to test in practice, but it is likely to be met in our set-up given that missing values arise from the EU-LFS requirements to provide an aggregate category for apprentices and trainees. In this way, the mechanism behind missing values is distinct from the model used to identify trainees from apprentices, satisfying (ii). Furthermore, the existence of missing values ( $TEMPREAS = 8$ ) should not depend on any (un)observable given that they originate from the EU-LFS requirements, satisfying (i).

If doubts exist regarding the validity of the ignorability assumption, the literature on missing value imputations recommends sensitivity analysis (StataCorp, 2023), involving modifying various aspects of the imputation model to check the stability of the estimates. The current results correspond to the fourth round and the results tend to indicate a certain stability for the estimated number of trainees at EU27 level (see Figure 53 discussed below).

Regarding the selection of an imputation model, the literature lists a series of factors to account for (StataCorp, 2023). It is especially important that the model includes as many covariates as possible to ensure that the relationships between variables are correctly captured. Moreover, variables of interest for the analysis (e.g. NACE industry and ISCO occupation codes) should be included in the specification. This implies that if such variables feature missing values, they should also be imputed. The full list of variables with the numbers and shares of missing values is displayed in Table 40. Furthermore, it is recommended to include variables that inform on the design and sampling procedure of the data, such as weights or information on the primary sampling unit<sup>288</sup>. With the exception of the weights, these variables are not available in Scientific use (anonymised) files provided by Eurostat.

Taking into account these considerations, together with the fact that all imputed variables are categorical<sup>289</sup> (see Table 40) and that the pattern of missing observations is arbitrary, imply that Multiple Imputation by Chained Equations (MICE) appears as the most appropriate procedure. MICE is a popular method for missing value imputations and it allows for addressing missing values for categorical variables in a convenient way. The main drawback of MICE is that it lacks theoretical justification and support (StataCorp, 2023).

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287 Missing value patterns can be monotone or arbitrary. See StataCorp (2023), for information on these patterns and their implications for missing value imputation.

288 See variable PSU in the EU-LFS user guide.

289 The only exception is the variable on usual weekly hours (HWUSUAL in the EU-LFS) which is transformed into a categorical variable (HWUSUAL\_agg in Table 40).



**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

**Table 40: Imputed variables**

Variable	Description	Missing values		Variable	Description	Missing values	
		Number	%			Number	%
citizenship_agg	Country of main citizenship: (1) National/native; (2) EU28/EU27_2020; (3) Rest	166	0.05	hwusual_agg	Hours per week usually worked: (1) ]0-20]; (2) ]20-30]; (3) ]30-40]; (4) More than 40	1746	0.51
educfed4	Participation to formal education/training in the last 4 weeks	395	0.12	atypical_workc1	Shift and/or night and/or Sunday work	3069	0.91
educnfe4_agg	Participation to a non-formal education/training activity: (0) Not participating; (1) Participating in at least one activity	542	0.16	atypical_workc2	Evening and/or Saturday work	4554	1.34
educnfe4_adj	Type of non formal education activity: (0) job-related non-formal activity; (1) Non job-related non-formal activity	31508	9.29	sizefirm_agg	Size of local unit: (0) Less than 10; (1) 10 or more	9248	2.73
degurba	Degree of urbanisation: (1) Cities; (2) Towns/Suburbs; (3) Rural areas	90	0.03	sizefirm_adj	Split firm size of 10 or more in: (0) 10-49; (1) 50 or more	28031	8.27
hatlev1d	Highest level of education reached: (1) Low: Lower secondary; (2) Medium: Upper secondary; (3) High: Third level	809	0.24	extrahrs_agg	Overtime hours: (1) None; (2) 5 or less; (3) More than 5	7762	2.29
isco_cons_agg	ISCO major groups aggregated into 7 occupations (See Table 17)	1207	0.36	register_agg	Registration at a public employment service.	31025	9.15
isco_cons_3d	ISCO 3 digits code for MPT proxy (See Table 41)	1207	0.36	wayjfoun_agg	Public employment service helped to find the current job	183974	54.26
ftpt	Full-time or Part-time status	32	0.01	tempdur_agg	Total duration of temporary job: (1) Less than 3 months; (2) 3 to less than 6 months; (3) 6 to less than 12 months; (4) 12 to less than 24 months; (5) 24 months or more	14680	4.33
homework_agg	Working at home: (0) Never; (1) Sometimes/main work place	362	0.11	trainee	(0) Apprentice; (1) Trainee	245071	72.28
nace_cons_agg	NACE industry codes (see Table 16)	734	0.22				

Note: List of variables included in the missing value imputation procedure. The suffix “\_agg” indicates that the variable is an aggregated version of the original variable. “\_adj” is only used for sizefirm and educnfe4. The number of missing values for the variable “wayjfoun\_adj” is not correct as it includes individuals who fall outside the scope of the variable

MICE proceeds in a similar fashion to Gibbs sampling used in Bayesian econometrics, by drawing sequentially from a series of conditional distributions. More precisely, a model is specified for each imputed variable (a logit or multinomial logit since all variables are binary or categorical). Variables are then ordered, usually from the lowest number of missing observations to the highest, but this ordering is not required when the pattern of missing observations is arbitrary. In the initialisation stage, the specification for the first variable is estimated based on the complete sample (i.e. ignoring missing values) and includes only completed variables (i.e. variables without any missing values). Using the estimation results, the missing values for this first variable are replaced with predicted values<sup>290</sup>, to which a random noise, drawn using estimates from the (multinomial) logit, is added. The specification for the second variable is then estimated using all completed variables, including the first variable with imputed missing values. At the end of the initialisation stage, all variables should be imputed, and the same process described for the initialisation stage is repeated, with the exception that the specifications for each variable now include all the variables (i.e. both complete and imputed). This step is repeated multiple times to ensure that drawings are taken from a stationary distribution. Iterations until convergence, usually known as burn-in iterations or periods, are discarded and the final imputed sample is obtained by performing a last iteration. These steps are then repeated to create M imputed samples.

Therefore, the number of burn-in periods and the number of imputed samples (simulations) M constitute key inputs to the procedure. The burn-in period can be determined as is often done in Bayesian methods, relying on trace plots to ensure convergence to stationary distributions. Figure 54 presents these trace plots from running 100 burn-in iterations and shows that convergence is achieved relatively quickly. There is no formal method to derive the precise number of simulations, M, needed in MICE. However, M should be positively related to the share of missing observations. It is further recommended to assess the fit of predictions for non-missing observations (i.e. compare predicted values with observed ones for non-missing values). The selected numbers for M and the burn-in iterations are discussed at the end of the section.

In the current set-up, the procedure is applied by pooling all MS observations together to avoid issues with the small sample size for some MS. This also minimises the importance of the 2021 data which would constitute the only year of observation with trainees separated from apprentices for some MS. However, doing so means that the effects of covariates on each dependent variable are treated as the same across MS. To account for potential (constant) MS effects, country indicator variables (country-fixed effects) are included in the specification. Other complete variables (i.e. without missing values) include year indicator variables, 5 years age groups with the groups of individuals above 35 aggregated into one category, sex, MS' youth (15-24) unemployment rates and the share of individuals aged 15-64 in education or training in the last four weeks<sup>291</sup>. Furthermore, MICE can be subject to various complications, such as perfect prediction. This issue often arises when working with categorical variables and corresponds to a situation in which a dependent variable is perfectly predicted by (a combination of) covariates. This can be the case for some of our variables of interest and is usually linked to the inclusion of MS indicator variables. In this event, the problematic MS indicator variable is dropped and replaced by a constant common to at least one other country.

From the evidence displayed in Figure 54, it appears that the procedure converges quickly - taking only 10-15 burn-in iterations to reach a stationary distribution for each variable. However, to accelerate the total computing time of the entire procedure, the number of burn-in iterations was set to 5 for the current version of the estimates. Regarding the number of imputed samples, M, the number was set to 50, which is a relatively high

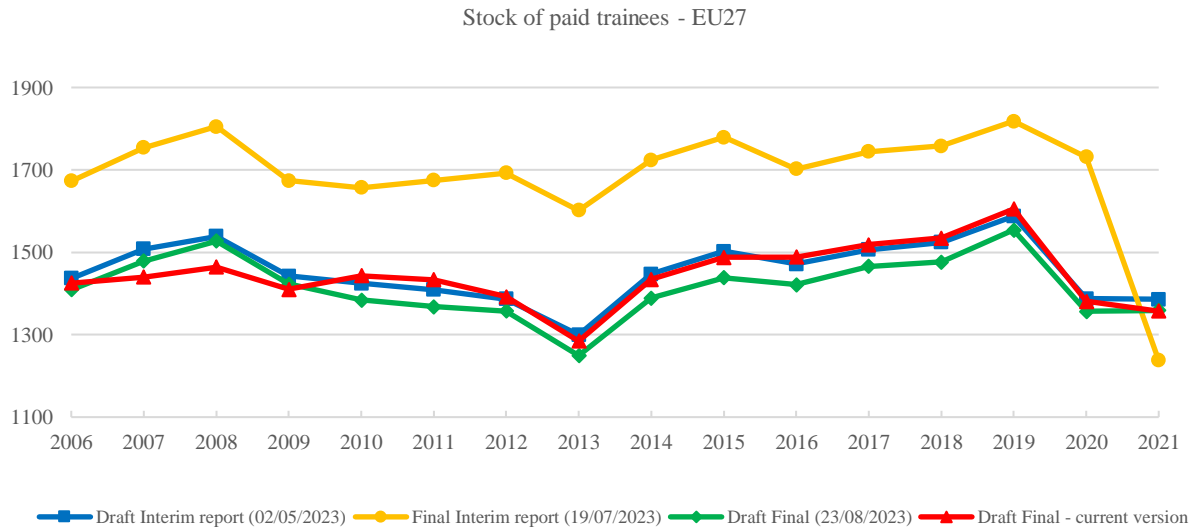
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290 Corresponding to the value of the dependent variable computed using the estimated parameters and the covariates.

291  $[une\_rt\_a]$  for youth unemployment rates ( $[une\_rt\_a\_h]$  for 2006-2008) and the share of individuals currently in education is constructed from  $[lfsa\_pgaied]$  and  $[lfsa\_pganws]$ .

number for MICE (StataCorp, 2023). This is explained by the fact that the share of missing values for the variable TRAINEE is high (Table 40).

**Figure 53: Stocks of paid trainees for each iteration of the procedure - EU27**



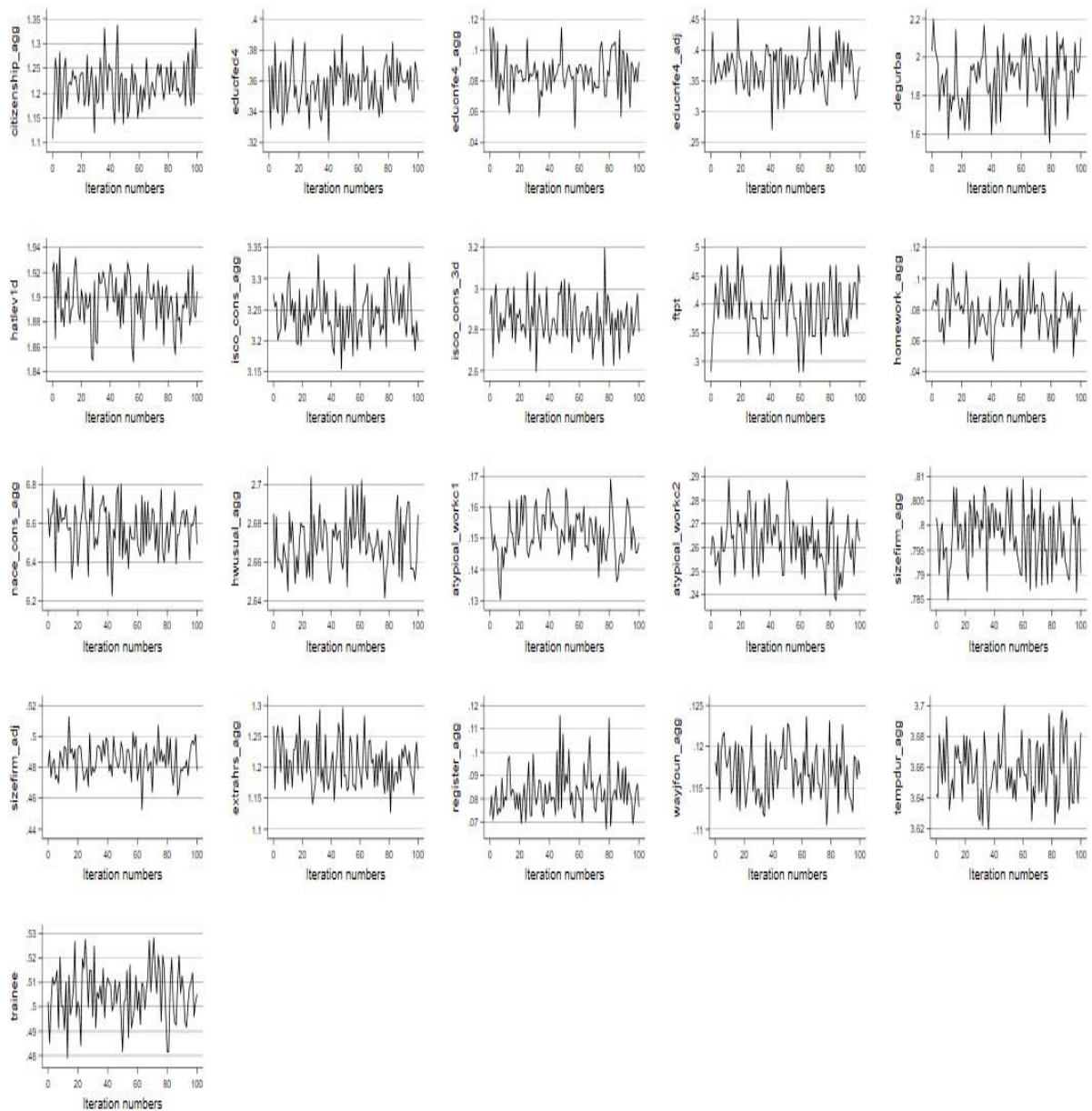
Note: Stock of paid trainees obtained for different rounds of the missing values imputation procedure.

In order to gain further insights into the sensitivity of the estimates for the total number of trainees, Figure 53 plots the estimate obtained at the EU27 level at various stages of the study. Each of these rounds of estimates has been obtained under a different number of simulations  $M$  (between 20 and 50), burn-in iterations (5 to 10), and for alternative specifications of individual (multinomial) logit models (e.g. Year indicator variables have only been included for the current version of the estimates). With the exception of the FIR version<sup>292</sup>, the estimates appear to be quite consistent across versions at EU27 level.

From this short discussion, the results obtained through the MI procedure seem to be robust and not very sensitive to the modelling choices. However, further investigations would still be required to reinforce the confidence in the results. In particular, the number of burning periods could be increased to 10 or 15 to ensure convergence for some variables (e.g. DEGURBA). The number of imputed samples,  $M$ , could also be increased to ensure that the high share of missing values for trainees is not affecting the final results. Furthermore, the overall analysis would benefit from a more thorough analysis of individual specifications for each imputed variable (logit and multinomial) to investigate whether no apparent issues can be detected (e.g. do the sign of the estimated coefficients make sense?) and whether these individual specifications can be improved by adding variables or by taking a more parsimonious approach.

<sup>292</sup> The difference between the FIR and other versions originates from the fact the missing value imputations was done at the level of the TEMPREAS variable instead of TEMPREAS = 4,5 or 8. The point was to try to identify potential trainees/apprentices among the missing values of TEMPREAS (i.e. replace some missing values of TEMPREAS by the categories 4,5 or 8), to then focus on this extended group of trainees/apprentices. This explains why the series is greater than for other version of the report. After careful considerations, it was decided to not pursue this route given that some MS indicate in LFS quality reports that a substantial share of missing values for TEMPREAS were assigned because the corresponding category in the national survey could not be found. Hence, these missing values do not correspond to trainees/apprentices and should not be imputed as such.

Figure 54: Trace plots from 100 burn-in iterations – imputed variables' means



Note: Trace plots from 100 burn-in iterations. Each sub-graph shows the mean of the imputed variables computed after each iteration. Variables are ordered as displayed in Table 40.

### Proxies for the types of paid traineeships

As explained in Section 2.1.1, the scope of the study covers four types of traineeships. After a brief reminder of their definitions, this section presents the methodology for computing stocks of paid traineeships by type. These stocks are computed from additional information provided by the EU-LFS and constitute proxies meant to approximate the definitions given below. It is therefore impossible to claim with certainty that the trainees identified under each type are actually undertaking the precise type of traineeship. Some of the limits associated with the methodology are discussed at the end of this section.

- Open market traineeships (OMT): take place under an agreement between the employer and the trainee. They aim to provide trainees with a first work experience through learning and training on the job.
- Active Labour Market Policy traineeships (ALMP): involve an agreement between three stakeholders – employer, trainee, and public employment service – without necessarily requiring a work contract and remuneration. These traineeships target unemployed/inactive young individuals and aim to smooth their transition to work.
- Education curricula traineeships (ECT): are part of curricula of formal education (school, vocational, or higher education and training).
- Mandatory professional traineeships (MPT): traineeships whose content is regulated under national law and whose completion is a mandatory requirement for trainees to access a specific profession (e.g. doctors, lawyers, professional accountants).

## Mandatory Professional Traineeships

MPT are proxied by the number of trainees working in specific occupations. The legal analysis results show that these occupations are most frequently doctors and other medical specialists, such as dentists or pharmacists, and legal professions, in particular lawyers and judges. Other occupations, specific to some MS includes teachers, architect or accountants<sup>293</sup>. These occupations may be identified using 3-digit ISCO occupation codes available in the EU-LFS and presented in Table 41. The ISCO classification changed from the 1988 classification to the 2008 classification (respectively ISCO88 and ISCO08 in Table 41) in 2011. Due to this change in classification, it is difficult to obtain fully consistent codes over the 2006-2021 time period. Furthermore, it is clear from the occupations identified that MPT tend to require a high level of education. This is captured by the restriction HATLEV1D = 3, which restricts observations to only those trainees who have a completed level of education equivalent to, at least tertiary education (i.e. at least a bachelor's or a higher vocational education diploma)<sup>294</sup>.

**Table 41: ISCO 3-digits occupations for MPT**

category	isco_cons_3d	ISCO88	ISCO08	MS
1	Other managers and professionals	- 1 Managers - 2 Professionals (other than listed below)		All
2	Health	- 221 Life science professionals - 222 Health professionals (except nursing)	- 221 Medical doctors - 225 Veterinarians - 226 Other health professionals	All
3	Legal	- 242 Legal professionals	- 261 Legal professionals	All
4	Accountants	- 241 Business professionals	- 241 Finance professionals	BE, DK, FR, HU, IT, PT and RO

<sup>293</sup> These three occupations were selected because they are found in at least one of the 5 MS contributing for more than 80% of the stock of paid trainees in the EU. Other occupations (e.g. social workers) have been reported in the legal analysis results but the inclusion of each occupation is likely to bring little added value because these occupations tend to represent a small share of employment. Hence, this level of details can be anticipated to affect the stock of MPT only marginally (at least at EU27 level).

<sup>294</sup> This restriction should also filter-out trainees, if any, who would do a traineeships in these occupations as part of a bachelor (i.e. with HATLEV1D = 2).

## STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

5	Teachers	<ul style="list-style-type: none"> <li>- 232 Secondary education teaching professionals</li> <li>- 233 Primary and pre-primary education teaching professionals</li> <li>- 234 Special education teaching professionals</li> <li>- 235 Other teaching professionals</li> <li>- 331 Primary education teaching associate professionals</li> <li>- 332 Pre-primary education teaching associate professionals</li> <li>- 333 Special education teaching associate professionals</li> <li>- 334 Other teaching associate professionals</li> </ul>	<ul style="list-style-type: none"> <li>- 232 Vocational education teachers</li> <li>- 233 Secondary education teachers</li> <li>- 234 Primary school and early childhood teachers</li> <li>- 235 Other teaching professionals</li> </ul>	BG, DE, FR and SI
6	Architects	- 214 Architects, engineers and related professionals	- 216 Architects, planners, surveyors and designers	BE, FR, LU and RO
7	Rest	- Occupations others than listed above		All

Note: 3-digits ISCO occupation codes used to proxy MPT.

### Education Curriculum Traineeships

ECT are obtained from trainees reporting to be in formal education (EDUCFED4 = 1) and who are not working in an occupation identified as MPT. Formal education corresponds to education in institutions, public or private, recognised by national education authorities.

### ALMP traineeships

ALMP traineeships are computed in two ways:

1. EDUC4WEEKS = 0 and HATLEV1D < 3 and AGE\_GRP > 14 AGE\_GRP < 30. This group captures trainees outside education whose highest level of education is upper secondary and who are younger than 30. This group corresponds to the target of the reinforced Youth Guarantee (YG).
2. EDUC4WEEKS = 0 and (REGISTER = 1 or REGISTER = 2 or REGISTER = 3 or WAYJFOUN = 1). These trainees are currently not in education and report being registered at a PES (REGISTER = 1 or 2) or to receive some help from another institution (REGISTER = 3), or they claim to have received some help from a PES to find their current employment (i.e. traineeship) arrangements (WAYJFOUN = 1).

### Open Market Traineeships

A proxy for OMT is obtained as a residual by subtracting the stocks of MPT, ECT and ALMP from the total number of trainees.

### Limits of proxy measures

A first limit of the proxy measure relates to the fact that the distinction between MPT and ECT is not necessarily clear-cut. In theory, MPTs should take place after the completion of university studies and are usually a requirement to be eligible for examinations required to access specific professions (e.g. the bar exam for lawyers, the state examination for

teachers in DE). On the other hand, mandatory traineeships can also be required to obtain university diplomas, with the said diploma being the requirement to access the profession (e.g. nurses in FR<sup>295</sup>). The distinction between these two types of mandatory traineeships is thin and confusion between the two can easily arise. Furthermore, the EU-LFS provides only information on the highest level of education completed aggregated into three categories. It is therefore not possible to distinguish between a traineeship that would take place at Master's level (HATLEV1D = 3, since the grade of Master's implies that a bachelor diploma has been obtained) and a traineeship that would take place after the completion of the Master level (typically the case for lawyers).

Moreover, MPT for some occupations are specific to MS and the precise identification of each occupation by MS constitutes a substantial task with limited added value given the potential confusion between ECT and MPT, and the fact that many of these professions represent a small share of employment (e.g. architects). Therefore, such a level of detail appears inappropriate for the task at hand, which is to provide proxy measures by type of traineeship.

Another limit of the proxy measures regards ECT and OMT. In many MS, it is common (often during the summer period) for students to undertake traineeships which are not compulsory, but more importantly, are not acknowledged for the obtention of the diploma (e.g. through ECTS). These traineeships take place without the involvement of the education provider, and as such, they should be recorded as OMT. A potential solution would be to consider traineeships for individuals in education and taking place during the months of July and August as OMT. However, this is only an imperfect solution as it is also possible for ECT, notably in upper-secondary and post-secondary non-tertiary education, to take place over the summer period. As is the case for the precise mapping of MPT, trying to adjust the methodology to account for these specificities does not appear particularly appropriate to provide proxy numbers of trainees.

With regards to ALMP traineeships, the main strategy is to target the population falling under the reinforced YG. It should be noted that before the introduction of the reinforced YG in 2020, the YG targeted individuals aged 15-24 and not 15-29. Hence, by fixing the relevant age bracket to 15-29, the proxy could potentially overestimate the actual number of ALMP traineeships before 2020. As a matter of fact, the proxy numbers obtained before the current iteration of the MI procedure have been computed by adapting the age bracket in 2018<sup>296</sup> from 15-24 to 15-29. This resulted in an increase of the share of ALMP traineeships by around 5-7 percentage points at EU27 level, at the extent of OMT. Given that this change in the age bracket created an artificial break in the series with limited interest, it was decided to keep the age bracket constant for the entire period of interest (2006-2021) at 15-29 years old.

### Annex 3.1.2 Prevalence of unpaid traineeships

Unpaid trainees are recorded in the EU-LFS as unemployed if they have met the required criteria (i.e. search effort and availability to start working within four weeks), or as inactive. This is due to their working conditions and the absence of pay received in exchange for their labour services, which exclude them from being recorded in employment according to the EU-LFS definition.

The methodology presented in this section tries to exploit additional information from the EU-LFS to proxy three types of unpaid traineeships, namely ECT, ALMP and OMT, as

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<sup>295</sup> To be more precise, nurses require a state diploma delivered by the "institut de formation en soins infirmiers france". This diploma corresponds to a bachelor and leads to the validation of 180 ECTS. See <https://www.ifits.fr/fr/formations/infirmier>.

<sup>296</sup> It was brought to our attention that the change in age brackets did not take place in 2018 but in 2020.

MPT are assumed to always be paid. For ECT, a new variable introduced in 2021 (HATWORK) informs on unpaid work experience(s) as part of education and is used to compute unpaid ECT. For ALMP traineeships and OMT, unpaid trainees are proxied as unemployed or inactive individuals (not-employed individuals), who report attendance to a non-formal training activity in the last four weeks. Intuitively, this proxy equates attendance to (non-formal) training and traineeship, which constitute a narrow conception of a traineeship. Hence, unpaid ALMP traineeships and OMT are likely to underestimate the actual number of traineeship. This point is further discussed in Annex 3.1.3.

## Mandatory Professional Traineeships

Based on the evidence from the legal analysis, MPT are assumed to always be paid. This is a strong and simplifying assumption, but according to the legal analysis, while not all trainees in MPT are granted employee status nor benefit from employee-equivalent remuneration, in most MS and for most professions (in particular Health and Education), MPT are paid. Furthermore, given the relatively small employment share that MPT represent, this assumption can be expected to have a small impact on the overall estimate of unpaid trainees.

## Education Curriculum Traineeships

ECT trainees are proxied by exploiting the variable HATWORK (introduced in 2021<sup>297</sup>) which records whether paid and unpaid working experiences took place as part of the education curriculum<sup>298</sup>. Unpaid work experiences could include other types of working arrangements, in particular apprenticeships. However, apprenticeships tend to be highly regulated and (almost<sup>299</sup>) all MS provide specific provisions guaranteeing a certain level of pay linked to the productive activity of the apprentice (i.e. a salary). Hence apprenticeships should be recorded as paid work experiences. According to the EU-LFS explanatory notes for 2021, extracurricular experiences should be not be considered relevant for HATWORK, as are MPT.

The HATWORK variable is asked to individuals aged 20-34 with an education level of at least upper-secondary (HATLEV1D = 2 or upper-secondary level<sup>300</sup>), the relevant level of education for the purpose of this study. The variable provides four categories, which cross-tabulate work experiences in terms of pay – (at least one) paid or (all) unpaid – and duration – less than 7 months or more than 7 months (duration should be cumulated in case of multiple work experiences). It is important to note that respondent could report an unpaid experience that took place a long time ago<sup>301</sup>. To solve this issue, the variable HATYEAR, informing on the year of completion of the highest level recorded in HATLEV1D, is used to restrict the sample to individuals who finished their highest level of education recently<sup>302</sup>. Because of the COVID pandemic and the new IESS FR introduced in 2021, HATYEAR was extended to 2016 (i.e. all individuals who finished their highest level of education attained between 2016 and 2021). Among this group, we compute the share who reports only unpaid work experiences as part of their curricula. The rate is

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297 A similar variable was part of the 2016 Ad-hoc module on young people on the labour market.

298 Unfortunately, it seems that the definition of pay used for HATWORK differs from what constitute pay to be recorded as employed (and hence paid trainee). For instance, a trainee only receiving reimbursement of expenses should be considered unpaid (page 74 of [EU-LFS Explanatory notes from Q1 2021 onwards](#)) whereas this seems to qualify as payment for HATWORK (page 163 of the same document). Furthermore, if multiple work experiences took place, only one paid is required for the individual to be recorded as having a paid work experience.

299 The precise mapping of apprenticeships regulations was not performed but the [EU-LFS Explanatory notes from Q1 2021 onwards](#) mentioned that work experiences such as dual training (i.e. apprenticeships) should be coded as paid experiences.

300 See Table 40 for the three education levels of the variable HATLEV1D.

301 For instance, a 34 years old respondent who finished a master at 23 could be referring to work experiences that took place more than 10 years ago.

302 In theory, one could use HATYEAR to compute yearly rates of unpaid work experiences but this was not pursued so as to maintain a larger sample size for each MS.

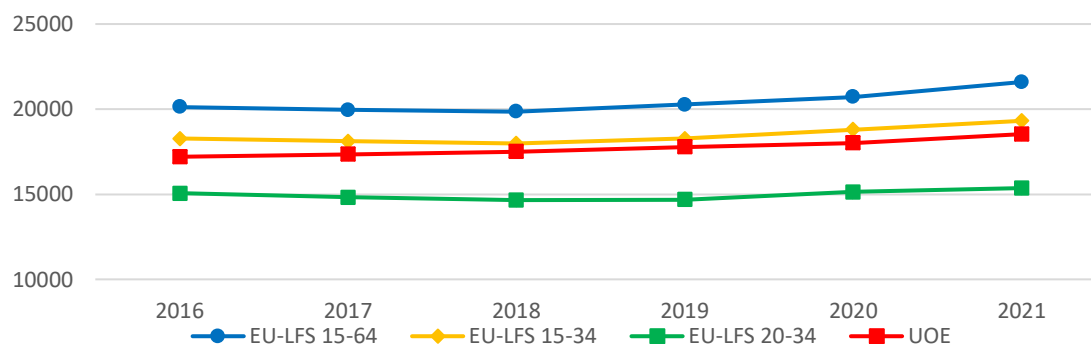


computed per level of education attained (HATLEV1D = 2 and HATLEV1D = 3 separately), but can also be interacted with the duration of the unpaid work experiences, gender or other personal characteristics available in the EU-LFS to refine the computations. The rates of unpaid work experiences by MS and levels of education, constitute the basis for the computations of unpaid ECT.

It is then necessary to identify the stock of student per their **current** level of education. This cannot be done directly in the EU-LFS since HATLEV1D refers to the highest level of education attained. Hence to identify individuals currently in HATLEV1D = 2, we focus on individuals with HATLEV1D = 1, who report being currently in education. The assumption is that, if they have been previously educated to HATLEV1D = 1 level, and are still in education, they should now be at a level above HATLEV1D = 1. Similarly, individuals currently in HATLEV1D = 3 are those with HATLEV1D = 2 or 3, who report currently being in education. We compute the above stocks without and with different age restrictions (e.g. HATLEV1D = 2 could correspond to individuals aged 15-19 whereas HATLEV1D = 3 should be individuals aged 18 and above). Figure 55 shows that the stock of tertiary students obtained using the EU-LFS and restricted to individuals aged 15-34, is not too different from the numbers provided by the UNESCO-OECD-Eurostat database. For upper secondary students (not reported in Figure 55), restricting to individuals aged 15-19 provides the closest numbers to the UOE series.

An important consideration to bear in mind is that the information extracted from HATWORK is based on individuals who fully completed the curriculum. However, it is likely that work experiences would take place at a later stage of the education program, often to validate the diploma in the case of vocational education. For this reason, the use of the complete stocks of students per their current level of education does not seem appropriate. As a result, we again make use of the HATYEAR variable to compute the number of years since HATLEV1D has been completed (i.e. the difference between the current year and HATYEAR). Students with a difference of 0 or 1 year are excluded from the stock of current students<sup>303</sup> on the ground that these students recently started their current studies and are hence less likely to take part in a traineeship. These stocks of students are computed for each year starting from 2016 and the rates of unpaid work experiences computed from HATWORK are used to obtain stocks of unpaid ECT trainees by MS and level of education.

Figure 55: Stocks of current tertiary students in the EU27 - LFS and UOE



Note: Comparison of the stocks of current tertiary students obtained from the EU-LFS using different age restrictions, with the stock of students published by Eurostat [educ\_uae\_enrt01]. Stocks are expressed in thousands.

<sup>303</sup> Large values (i.e. individuals who completed their current highest level of education more than 4 years ago) are also filtered-out of the pool of student.

## ALMP traineeships

As explained above unpaid ALMP traineeships are proxied from the group of not-employed individuals (i.e. unemployed or inactive) who report attending a non-formal training activity in the past four weeks. The pool of not employed is restricted to individuals aged 15-29 as this age group represents around 80% of the total stock of paid trainees in the EU, and one could reasonably surmise that unpaid traineeship opportunities are (more likely to be) rejected by 'older' people who have greater financial constraints (e.g. family). Additional individuals are also dropped from the group of not-employed individuals aged 15-29<sup>304</sup>, as are individuals in education (used for unpaid ECT). The variable REGISTER is further used to identify individuals in the restricted group of not-employed who are registered to a PES (REGISTER = 1 or 2 or 3). The number of unpaid ALMP traineeships is then obtained from those who report recently participating in a non-formal training activity (EDUCNFE4) or being unavailable to immediately start working because they are currently undertaking training (AVAIRES). As briefly explained above, this proxy equates traineeships to training, but the latter is certainly not equivalent to a traineeship. Furthermore, there is no clarification as to whether the training activity took place at a workplace. More precisely, the EDUCNFE4 variable before 2021 records both job- and non-job-related training activities without the possibility to distinguish between the type of training activities prior to this year. A gross adjustment is nonetheless performed using the 2021 shares of respondents who report attending job-related training among the total number of individuals participating in training activities. These shares are computed for each MS and applied to the stock of individuals registered at a PES to approximate the yearly stocks of unpaid ALMP traineeships.

## Open Market Traineeships

For unpaid OMT traineeships, the reference population of not employed defined above for ALMP unpaid traineeships is further restricted by removing individuals registered at a PES. The methodology then relies on EDUCNFE4 and AVAIRES as is done for unpaid ALMP traineeship including the adjustment for job and non-job related activities.

Numbers of unpaid traineeships, in total and by type, are displayed in Table 18 to Table 22.

### Annex 3.1.3 Underestimation of the number of paid and unpaid trainees

The methodology described above for the computation of the number of trainees in the EU suffers from some limits discussed below. These limitations are likely to result in an underestimation of the actual number of paid and unpaid trainees.

#### Paid trainees

The EU-LFS is a survey and as such, it suffers from well-known problems affecting this type of data. More precisely, the issue of stock sampling<sup>305</sup> (i.e. the fact that respondents are interviewed at a precise moment in time) is probably leading to an underestimation of the number of short-duration trainees. To understand this issue, one can think of a respondent interviewed in the first quarter of a given year and reinterviewed again in the

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304 These are: 1) inactive because they are waiting for their new job to start, 2) inactive due to absence for parental leave, 3) inactive due to disability and 4) individuals who report not currently seeking and wanting work.

305 See European Commission, Directorate-General for Employment, Social Affairs and Inclusion (2020). 'How to use administrative data for European Social Funds counterfactual impact evaluations - A step-by-step guide for managing authorities', Publications Office, 2020.

second quarter<sup>306</sup>. For each of these interviews, the respondent is asked about his/her labour market activities during the reference week (i.e. the week that usually precedes the interview). This implies that no information on the labour market status of the interviewee is extracted for the months in between the two reference weeks. Therefore, it is possible for a (young) unemployed individual in the first interview to undertake a short duration traineeship of one or two months, finish his/her traineeship and be without employment again at the moment of his/her second interview. This short-duration traineeship would not be recorded in the EU-LFS leading to an underestimation of the total number of trainees over the year<sup>307</sup>. This issue is particularly relevant if one compares survey and administrative data, as the latter type of data would record all traineeships, irrespective of their duration<sup>308</sup>. The underreporting of traineeships can be expected to be greater for MS with high shares of short-duration traineeships, though short duration traineeships are also less likely to be paid as the legal analysis highlights that pay can be compulsory for traineeship of longer duration<sup>309</sup>.

## Unpaid trainees

With regards to unpaid trainees, there is a much greater uncertainty surrounding these numbers given that there are no direct ways to identify these trainees in the EU-LFS. This uncertainty is reflected in a more conservative approach taken to derive these numbers, as it appeared more appropriate to compute a minimum number (i.e. lower bound) of trainees rather than providing larger numbers without possibilities to cross-check the values. For ECT, the population currently in education is restricted to individuals who are at least in the second or third year of their curricula. Furthermore, the definition of pay used for the HATWORK variables appears to be broader than that used by the EU-LFS to determine employment. This should decrease the number of unpaid work activities reported by HATWORK, and it should be noted that in the event of multiple traineeships, the variable HATWORK records a paid work experience, if at least one of these activities is paid. Nevertheless, unpaid ECT are computed from a variable that provides information on unpaid work activities as part of the curriculum, which is not the case for unpaid ALMP and OMT. Hence, the uncertainty around the stock of unpaid ALMP and OMT is much more substantial, especially for OMT<sup>310</sup>. These two stocks are computed by equating attendance to training activities with traineeships, which constitutes a rather restrictive definition of what is a traineeship. As a matter of fact, between 7% and 10% of paid trainees at the EU level report attending a training activity in the last four weeks. This number cannot be extrapolated to obtain stocks of unpaid trainees, but it suggests that using attendance to training is likely to underestimate the actual number of unpaid trainees.

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306 All MS samples are longitudinal.

307 The longitudinal dimension is used for illustrative purposes. The argument holds without considering this aspect as it will be more likely for a survey that inquires about labour market activities in a single week, to miss short-duration activities.

308 Note that this is the case for FR and IT. In FR, the DARES published a note ([https://dares.travail-emploi.gouv.fr/Dares\\_Formation\\_Stages\\_en\\_entreprise\\_2020.pdf](https://dares.travail-emploi.gouv.fr/Dares_Formation_Stages_en_entreprise_2020.pdf)) reporting a stock of 289 000 paid trainees in 2019. This number is much greater than the EU-LFS (166 000). The SIES also report the stock of trainees in education (see also box 1 in the DARES note) which is again greater than the stock of paid ECT obtained through the EU-LFS (175 000 and 114 000 respectively). In IT, the ANPAL publishes a report on ALMP (extracurricular) traineeships ([https://www.anpal.gov.it/volume\\_monitoraggio\\_tirocini.pdf](https://www.anpal.gov.it/volume_monitoraggio_tirocini.pdf)) showing a stock of 318 521, 370 544, 351 153 and 355 802 for the years 2016-2019. The number of ALMP trainees from the EU-LFS for the same years are 262 369, 296 299, 290 428 and 311 636, again smaller than reported by administrative data, though we note the similar profile across the two sources with an increase in 2017, followed by a decrease in 2018. These two examples tend to confirm that the EU-LFS is likely to underestimate the number of paid trainees.

309 Furthermore, this issue with short duration traineeships also provides a (partial) explanation for why the distribution of traineeship duration in the EU-LFS displays high shares of long duration traineeships.

310 For unpaid ALMP traineeship, it is at least known that the individual is registered at a PES. Furthermore, the legal analysis indicate that this type of traineeship provides trainees with some form of remuneration in most MS such that a small number of unpaid ALMP traineeships could be anticipated.

## Annex 3.2. Baseline projections

This section describes the trend impact analysis<sup>311</sup> used to obtain projections of the future number of the different types of traineeship in the EU for 2022-2030. The analysis uses the prevalence trends estimated through the EU-LFS. The reference scenario assumes for each type of traineeship an annual growth rate equal to the average yearly growth rate observed in the five years before the outburst of the COVID-19 pandemic in Europe. The motivation for selecting the 2014–2019 time window is two-fold. First, it allows for capturing potential long-lasting effects of the QFT on traineeship prevalence in the EU. In addition, it enables analysing structural trends in traineeship prevalence before the disruptive impacts of COVID-19. By applying the average yearly growth rate by traineeship type to the baseline number of trainees in 2019, we obtain the projected trends in traineeship prevalence for the period 2020-2030. In addition to the reference scenario, we consider an alternative scenario in which OMT grow at a stronger rate. The high-growth scenario accounts for the potential impacts of future economic developments connected to the impacts of the green and digital transition on the EU labour market and the need for re-skilling and up-skilling. Thus, it contributes to relaxing the assumption that future trends consist of a simple continuation of earlier trends.

The table below shows the average yearly growth rate of each type of traineeship for the period 2014 and 2019, conditioning on whether the traineeships were paid or not. Column (3) shows the growth rates of OMT in the high-growth scenario. In this scenario, the growth rate of paid and unpaid OMT are assumed to be equal to the average yearly growth rate of paid and unpaid traineeships (for all types of traineeships) for the period 2014-2019. These correspond to 2.3% for paid traineeships (as opposed to the -0.04% yearly growth rate of the reference scenario) and 0.4% for unpaid traineeships (as opposed to the 2.3% of the reference scenario).

**Table 42: Average yearly growth rate 2014-2019 by (un)paid traineeship type**

Traineeship Type	Average Yearly Growth Rate 2014-2019 (Baseline projections)	Average Yearly Growth Rate 2014-2019 (high growth scenario for OMT)
Paid OMT	0.4%	2.3%
Paid ALMP	2.8%	2.8%
Paid ECT	5.1%	5.1%
Paid MPT	4%	4%
Unpaid OMT	2.3%	0.4%
Unpaid ALMP	3.7%	3.7%
Unpaid ECT	0%	0%

The tables below show the projected yearly growth of the number of traineeships for the period 2020-2030 under the baseline and high growth scenarios, by traineeship type and conditioning on whether the traineeship was paid or unpaid. In brackets, we report each type of traineeship as a fraction of the total number of traineeships, conditioning on whether they were paid or not.

<sup>311</sup> Quantitative methods assume that forces at work in the past will continue to work in the future and future events that can change past relationships or deflect the trends will not occur or have no appreciable effect. The TIA is a simple approach to forecasting in which a time series is modified to take into account perceptions about how future events may change extrapolations that would otherwise be surprise-free.

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

**Table 43: Historical and projected number of trainees in the EU (in thousand)**

Years	Paid					Unpaid			
	MPT	ECT	ALMP	OMT	OMT (HGS)	ECT	ALMP	OMT	OMT (HGS)
2013	122 (9.5%)	360 (28.1%)	431 (33.6%)	371 (28.9%)	371 (28.9%)				
2014	125 (8.7%)	398 (27.8%)	466 (32.5%)	445 (31%)	445 (31%)				
2015	131 (8.8%)	378 (25.4%)	492 (33.1%)	487 (32.7%)	487 (32.7%)				
2016	162 (10.9%)	448 (30.1%)	496 (33.3%)	384 (25.8%)	384 (25.8%)	1,237 (85.9%)	69 (4.8%)	134 (9.3%)	134 (9.3%)
2017	161 (10.6%)	441 (29%)	521 (34.3%)	396 (26.1%)	396 (26.1%)	1,227 (85.4%)	69 (4.8%)	141 (9.8%)	141 (9.8%)
2018	155 (10.1%)	484 (31.6%)	508 (33.1%)	389 (25.4%)	389 (25.4%)	1,228 (86.1%)	67 (4.7%)	131 (9.2%)	131 (9.2%)
2019	149 (9.3%)	504 (31.4%)	533 (33.2%)	420 (26.2%)	420 (26.2%)	1,237 (85%)	76 (5.2%)	143 (9.8%)	143 (9.8%)
2020	157 (11.3%)	443 (31.9%)	461 (33.2%)	326 (23.5%)	326 (23.5%)	1,297 (87.5%)	50 (3.4%)	135 (9.1%)	135 (9.1%)
2021	159 (11.6%)	575 (42.2%)	370 (27.2%)	258 (19%)	258 (19%)	1,299 (81.8%)	119 (7.5%)	169 (10.6%)	169 (10.6%)
2022	165 (11.7%)	605 (43%)	380 (27%)	257 (18.3%)	264 (18.7%)	1,299 (81.4%)	124 (7.7%)	173 (10.8%)	170 (10.7%)
2023	172 (11.8%)	636 (43.7%)	391 (26.9%)	256 (17.6%)	270 (18.4%)	1,299 (81%)	128 (8%)	177 (11%)	170 (10.7%)
2024	179 (11.9%)	669 (44.5%)	402 (26.7%)	255 (16.9%)	276 (18.1%)	1,299 (80.5%)	133 (8.2%)	181 (11.2%)	171 (10.7%)
2025	186 (11.9%)	703 (45.2%)	413 (26.5%)	254 (16.3%)	283 (17.8%)	1,299 (80.1%)	138 (8.5%)	185 (11.4%)	172 (10.7%)
2026	193 (12%)	740 (45.9%)	425 (26.4%)	252 (15.7%)	289 (17.6%)	1,299 (79.6%)	143 (8.7%)	190 (11.6%)	172 (10.7%)
2027	201 (12.1%)	778 (46.7%)	436 (26.2%)	251 (15.1%)	296 (17.3%)	1,299 (79.1%)	148 (9%)	194 (11.8%)	173 (10.7%)
2028	209 (12.1%)	818 (47.4%)	449 (26%)	250 (14.5%)	303 (17%)	1,299 (78.7%)	153 (9.3%)	199 (12%)	174 (10.7%)
2029	218 (12.2%)	860 (48.1%)	461 (25.8%)	249 (13.9%)	310 (16.8%)	1,299 (78.2%)	159 (9.6%)	203 (12.2%)	174 (10.7%)
2030	226 (12.2%)	904 (48.8%)	474 (25.6%)	248 (13.4%)	317 (16.5%)	1,299 (77.7%)	165 (9.9%)	208 (12.5%)	175 (10.7%)

note: HGS stands for High growth Scenario

### Annex 3.3. Estimation of the number of problematic traineeships

This section describes the methodology used to estimate the number of problematic traineeships in the EU based on the data from the Eurobarometer 2023 and the estimated number of trainees obtained from the EU-LFS survey. The methodology builds on existing evidence from policy reports documenting the existence of fraudulent practices in traineeships. While there are no available estimates on the number of problematic traineeships in the EU (partially due to the usual difficulties in identifying fraud), numerous studies have identified a list of criteria to distinguish between “real” work and traineeships. To start, since problematic traineeships are used as a means to reduce labour costs, frauds are mainly concentrated in traineeship programs that are not remunerated or have low levels of remuneration. In addition, trainees victim of fraudulent practices often perform tasks inherent to the professional category for which they are being trained, diluting the training activity undertaken in an ordinary working day. Abusive working

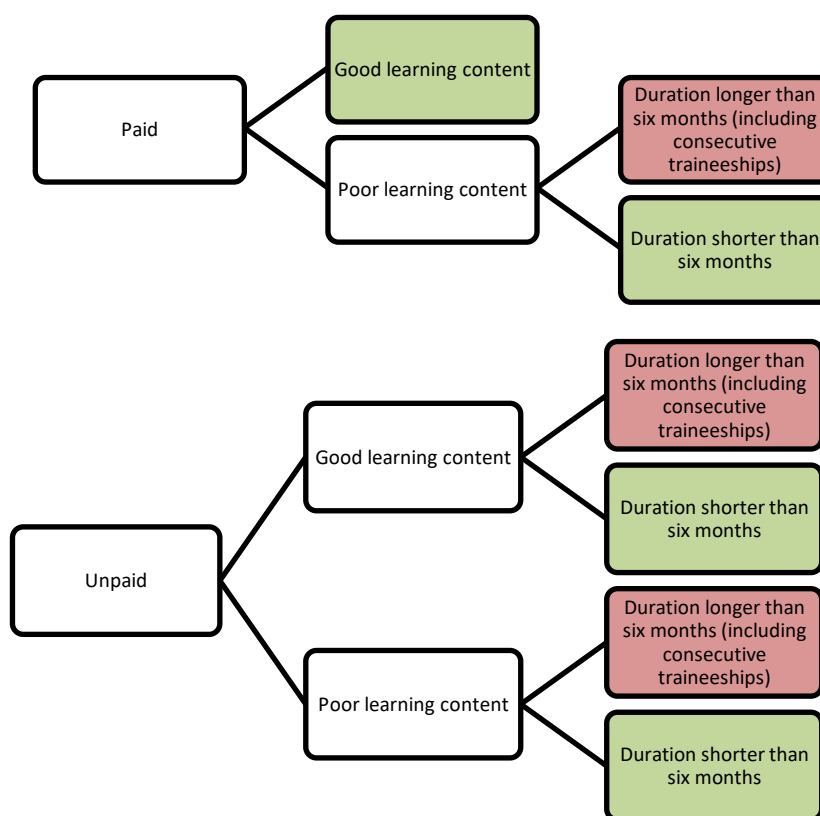
**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

conditions also manifest in the form of insufficient or totally absent social protection and excessively long traineeship duration<sup>312</sup>. Building on this empirical evidence, we select a list of criteria to determine problematic traineeships based on the following six questions from the Eurobarometer Survey covering aspects related to remuneration, learning component, and duration.

**Table 44: Survey questions used to assess problematic traineeship**

dimension	Eurobarometer Survey Question
Remuneration	Were you paid or offered financial compensation for your last traineeship?
Duration	Thinking about your last traineeship, how long did this traineeship last? If you have done multiple traineeships, were any of these with the same employer?
Learning	During your last traineeship, you learnt things that are useful professionally During your last traineeship, you could turn to a mentor who helped you and explained how to do the work (agreement on a scale from 1-4)

The identification of problematic traineeships is based on the decision tree depicted below. The green boxes represent proper traineeship relations, the red boxes represent problematic traineeships.



A traineeship has good learning content if the respondent agreed (i.e., if they strongly or partially agreed) with the fact that she learnt things that are useful for her profession and she could rely on a mentor during the traineeship. Otherwise, the traineeship was assumed to have poor learning content (i.e., if the respondent was in disagreement with one or both statements). Excessively long traineeships include traineeships longer than

312 Montoro et al. (2023), False self-employment and bogus internships in Spain. The Economic and Labour Relations Review, 34, 314-327. Cambridge University Press.

six months and multiple short traineeships (lasting between three and six months) with the same employer.

The algorithm described above allows us to estimate the fraction of problematic traineeships by traineeship type. The product between the estimated share of fraudulent traineeships and the total number of trainees by traineeship type (estimated through the EU-LFS data) gives the number of problematic traineeships in absolute terms. The table below shows the estimates for 2019. Averaging across MS, the fraction of problematic traineeships was 23% for ALMP, 21% for ECT and OMT and 19% for MPT.

**Table 45: Estimated number of problematic traineeships in the EU, 2019**

	Paid				Unpaid			Paid	Total	
	ALMP	ECT	MPT	OMT	ALMP	ECT	OMT	Trainees		
EU27	46761 (8.8%)	27936 (5.5%)	12766 (8.6%)	28274 (6.7%)	6409 (8.4%)	38381 (3.1%)	10425 (7.3%)	55215 (3.8%)	115737 (7.2%)	170 952 (5.6%)

Note: The table shows the estimated number of problematic traineeships in the EU in absolute and percentage terms (in parenthesis). Problematic traineeships were estimated using data from the Eurobarometer 2023 Survey on aspects related to remuneration, access to social protection, learning component, duration. Data on the total number of trainees come from the EU-LFS and refer to 2019.

These estimates are subject to numerous limitations. To start, they are influenced by the self-response bias of the respondents of the survey. In addition, they rely on an incomplete set of variables to identify the problematic use of traineeships. Last and most importantly, the assessment of problematic traineeships is complicated by the fact that the distinction between training and regular work is often blurred, thus requiring a case-by-case assessment.

### Annex 3.4. Traineeships of long duration, including consecutive traineeships

This section explains the methodology adopted in this study to estimate the (i) number of trainees with traineeship contracts longer than six months, (ii) the number of trainees who did consecutive traineeships with the same employer that were overall longer than six months and (iii) the number of trainees who did multiple traineeships with different employers. The approach proposed combines two sources of data, namely the Eurobarometer 2023 Survey and the EU-LFS data. Results of the Eurobarometer survey are used to obtain information on the prevalence of excessively long traineeships and repeated traineeships. The EU-LFS data are used to estimate the number of trainees in Europe.

#### Annex 3.4.1 Traineeships longer than six months

In the Eurobarometer 2023 Survey respondents were asked to report the length of their last traineeship. This allows for computing the share of trainees who reported having undertaken a traineeship longer than six months, by country, traineeship type and whether the traineeship was remunerated or not. By multiplying the share of traineeships longer than six months by the total number of trainees estimated through the EU-LFS (by country, traineeship type and remuneration) we obtain an estimate of the number of trainees who conducted a traineeship longer than six months in absolute terms. Repeated traineeships with the same employer

In addition to the number of traineeship contracts longer than six months, excessively long traineeships occur when an individual does multiple short traineeships with the same employer. In the Eurobarometer survey, participants were asked whether they had undertaken multiple traineeships, and whether any of these traineeships occurred with the same employer. Unfortunately, respondents were not asked about the length of each single traineeship, except for their last one. Thus, it is not possible to precisely compute whether the traineeship with the same employer was longer than six months overall. To overcome this data limitation, we assume that a respondent had a traineeship longer than six months if she had more than one traineeship with the same employer and her last traineeship was between three and six months long. Clearly, this approach leads to an overestimation of the number of consecutive traineeships longer than six months. Importantly, information on the type of traineeship and remuneration coverage is also missing for traineeships different from the last one. Thus, we assume that prior traineeships were of the same type and had the same remuneration policy as the last one.

### Annex 3.4.2 Repeated traineeships with different employers

The fraction of respondents conducting multiple traineeships with different employers was estimated based on whether (i) participants reported having done multiple traineeships, (ii) none of these traineeships were with the same employer. This allows us to obtain an approximation of the number of trainees who were asked for prior work experience to conduct a traineeship. The results are presented in the table below. This approach is likely to overestimate the yearly number of employers requiring prior work experience of trainees for two reasons. First, not all trainees who undertook numerous traineeships were required to have prior work experience. Secondly, in the Eurobarometer survey respondents were asked to consider all possible traineeships, not only those related to the current year. This implies that the yearly number of multiple traineeships with different employers could be substantially lower.

## Annex 3.5. Methods to estimate the costs of the policy options

### Annex 3.5.1 Costs to familiarise with the new provisions (familiarisation costs)

The unit cost for familiarisation of businesses with new provisions is based on the estimations from the REFIT study on the working time Directive<sup>313</sup>, revised in the impact assessment for the transparent and predictable working condition Directive to take account of inflation. The total price per person to familiarise him/herself with EU legislation is provided in the table below. The average familiarisation costs result in EUR 53 for SMEs and EUR 39 for large companies.

**Table 46: Unit cost per person for familiarisation with new EU legislation**

Member State	SMEs	Large companies
AT	74.4	53.6
BE	69.2	49.0
BG	7.2	5.5
CY	34.1	26.5

<sup>313</sup> ICF (2014) Study measuring the impacts of various possible changes to EU working time rules in the context of the Review of the Directive 2003/88/EC.



**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

Member State	SMEs	Large companies
CZ	17.8	12.9
DE	68.3	45.6
DK	76.2	51.0
EE	14.3	9.8
EL	25.7	18.3
ES	44.6	33.7
FI	62.6	43.9
FR	65.0	47.2
HR	26.9	20.7
HU	19.3	14.0
IE	62.6	43.0
IT	73.2	56.3
LT	11.1	8.0
LU	84.1	58.0
LV	12.8	8.0
MT	24.6	16.5
NL	54.4	35.3

Source: SWD Impact assessment for the transparent and predictable working condition Directive

The product between the unitary costs per enterprise and the total number of organisations hiring trainees gives the aggregate familiarisation costs of the initiative. The Eurostat Structural Business Statistics dataset gives the total number of companies by firm size. However, information on the number of companies employing trainees (that is, the companies that will have to familiarize with the new provisions) could not be found. In the absence of more accurate data, an estimate of the number of companies hiring trainees is obtained by dividing the total number of trainees per country (paid and unpaid) by the total number of employees. The resulting estimates are provided in the table below:

**Table 47: Aggregate familiarisation costs**

Country	Aggregate familiarization costs
AT	11255
BE	19800
BG	525
CY	456
CZ	8360
DE	48940
DK	11695
EE	1680
EL	6524
ES	81692
FI	9526
FR	73052
HR	3333
HU	5224
IE	6386
IT	139967
LT	6081
LU	352
LV	617
MT	955
NL	17794
PL	52315
PT	21384
RO	6068
SE	9695

SI	640
SK	6993

### Annex 3.5.2 Cost of a non-binding measure ensuring social protection to all trainees

To obtain an upper bound to the costs of extending social protection to all trainees, we proceed as follows. To start, we combine data from Eurobarometer on the fraction of participants who reported not having access to social protection (by traineeship type and remuneration coverage) with the estimated number of traineeships from the EU-LFS to obtain the total number of trainees without social protection coverage.

Next, we use Eurostat statistics on the fraction of the non-wage costs in the total labour costs to obtain an estimate of the hourly social protection costs. These are then scaled at the monthly level by multiplying them by the country average number of weekly hours of work (Eurostat) and by four weeks.

The product between the monthly non-wage costs and the number of trainees without access to social protection gives the monthly costs of ensuring social security to all uncovered trainees. The yearly costs in each MS are obtained by multiplying the monthly costs by the average duration of traineeships from the Eurobarometer survey, an indicative measure of the average traineeship duration. The results of these calculations are presented in the table below. They show the upper bound costs under the assumption that all MS will implement the provisions of the Recommendation.

Since not all MS are expected to implement the recommendation, we perform a sensitivity analysis in which we assume that only some MS will implement the recommendation. In particular, we consider a conservative scenario in which we assume that only 9 out of 27 MS will implement the initiative in the respective national regulatory framework (this corresponds to the number of countries that introduced the least implemented QFT principle in their national regulatory framework for OMT according to the Study Supporting the Evaluation of the Quality Framework for Traineeships). To obtain an estimate of the costs under this scenario, we multiply the aggregate costs of ensuring social security to all trainees across the EU MS by 33% (9/27). The results at the EU level are presented in the table below.

**Table 48: Aggregated costs from extending social security to all trainees**

	Costs of extending social security to all trainees under the full implementation scenario	Costs of extending social security to all trainees under the partial implementation scenario
EU 27	8 420 780 858	2 778 857 683

### Annex 3.5.3 Costs of transparency of vacancies

The Ecorys (2023) study supporting the evaluation of the QFT estimated that on average it takes 1 to 2 hours for a TP to draft a vacancy notice under the baseline scenario (2014 QFT). The measure would add the following elements: the overall working conditions, coverage of social protection, and the learning and training component. Conservatively, one could estimate an additional hour per vacancy notice in order to cover these new elements. An estimate of the number of vacancies that would be affected can be obtained from Ecorys (2023), which finds that 42% and 59% of OMT and ALMP vacancies mentioned the allowance and compensation of the traineeships. Thus, we assume that, on average, around 50% of the yearly vacancies would have to be affected by the

initiative. The product between the number of vacancies (obtained from the total number of paid and unpaid trainees from the 2019 EU-LFS) and the hourly labour costs give the aggregate costs of the binding measure. These are reported in the table below:

**Table 49: Costs of transparency of vacancies**

Country	Hourly Labour Costs	Estimated number of vacancies affected	Aggregate Costs (€)
EU27	30.5	1530327	46674973.5

### Annex 3.5.4 Enforcement Costs

The costs generated by the measure to strengthen enforcement depend on the way this initiative is implemented.

In the first, **low bound scenario**, the number of labour inspectors in the MS remains unchanged while a share of current labour inspectors receives new training specific to traineeships. Data on the number of hours dedicated to training specific to traineeships could not be retrieved from most of the national labour inspection reports. Thus, this information is extrapolated from the Spanish annual labour inspection reports, which explicitly indicate the amount of hours of training dedicated to traineeships rules. In particular, between 2020 and 2021, 40 hours of training were dedicated to traineeships rules (13 hours in 2020 for 16 participants<sup>314</sup> and 27 hours in 2021 for nine participants<sup>315</sup>). In this scenario, we assume that the same additional number of hours of traineeships specific training is introduced in the EU MS, independently of the number of labour inspectors and trainees in each country. The product between the 40 hours and the country specific labour costs gives an estimate of the costs of training in the EU MS in the two years following the introduction of the initiative. Summing up across MS, the initiative would cost EUR 27,256 under this scenario.

**Table 50: Estimated costs of traineeships specific training for labour inspectors**

Country	Hourly Labour Costs	Estimated training costs
AT	39	1560
BE	43.5	1740
BG	8.2	328
CY	19.4	776
CZ	16.4	656
DE	39.5	1580
DK	46.8	1872
EE	16.4	656
EL	14.5	580
ES	23.5	940
FI	35.9	1436
FR	40.8	1632
HR	12.1	484
HU	10.7	428
IE	37.9	1516
IT	29.4	1176
LT	13.1	524
LU	50.7	2028
LV	12.2	488
MT	14	560
NL	40.5	1620
PL	12.5	500

314 Informe Anual de la Inspección de Trabajo y Seguridad Social 2020. Ministerio de Trabajo y Economía Social.

315 Informe Anual de la Inspección de Trabajo y Seguridad Social 2021. Ministerio de Trabajo y Economía Social.

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

PT	16.1	644
RO	9.5	380
SE	40.1	1604
SI	23.1	924
SK	15.6	624
EU 27		27 256

In a second, **high bound scenario**, new labour inspectors may be hired. The optimal number of inspectors to be hired is obtained as follows. First, in countries with at least 10 000 trainees, the optimal number of inspectors (denoted by  $L^*$  in what follows) is determined by dividing the number of paid trainees in each country by 10 000 – the optimal ratio inspectors/employees recommended by the ILO. Next, we obtain from the ILO database the gaps in the optimal number of inspectors per employees. We assume that the gaps in the relative number of inspectors for trainees are equal to the gaps in the relative number of inspectors per employees.

For instance, the optimal number of labour inspectors per trainees is 5 in Austria (not reported here but equal to  $45\,127/10\,000$ ). Since Austria has 0.71 inspectors per 10 000 employees, we assume that  $0.29 \cdot 5$  new inspectors would have to be hired to reach the optimal target of inspectors for trainees. This corresponds to one new labour inspector.

In countries with less than 10 000 trainees we assume that a new labour inspector needs to be hired if there is less than one labour inspector per 10 000 employees.

**Table 51: Labour inspectors and training costs - high bound scenario**

Country	Paid trainees	Optimal number of inspectors	Labour inspectors/10,000	New inspectors	Annual labour costs public sector	Total costs of new inspectors	Training costs	Total costs
EU27	1 605 023	161		16		1 051 796	27 256	1 160 445

Note: The table shows the estimated enforcement costs for hiring and training new labour inspectors. Data on the ratio between the number of labour inspectors per 10,000 employees were missing for DK, EL, IT, NL.

The third, intermediate, scenario only deviates from the second scenario by assuming that only 50% of the new inspectors will be hired. For instance, if a country would have to hire 4 inspectors according to the procedure described above, we assume that only 2 will be hired. Here we also assume that training is provided as outlined above.

**Table 52: Labour inspectors and training costs under - intermediate scenario**

Country	Paid trainees	Optimal number of inspectors	Labour inspectors/10,000	New inspectors	Annual labour costs public sector	Total costs of new inspectors	Training costs	Total costs
EU27	1 605 023	161		16		769 532.9	27 256	791 540

Note: The table shows the estimated enforcement costs for hiring and training new labour inspectors. Data on the ratio between the number of labour inspectors per 10,000 employees were missing for DK, EL, IT, NL.

From the perspective of the employers, this policy measure is not expected to introduce any additional enforcement costs. The enforcement costs for employers connected to the visits to workplaces by inspectors would not be affected by the intervention since the organisation of inspectors' visits would not change.

### Annex 3.5.5 Recruitment costs

Empirical evidence on the magnitude of recruitment costs for trainees is rare due to the limited availability of suitable data. Recruitment costs are determined by numerous factors, including the costs of filling a vacancy and of screening and selecting candidates, workers representation at the firm level and collective bargaining agreements coverage.

A recent study using firm-level data in Germany estimated the average costs to fill an apprenticeship vacancy at EUR 600, distributed in EUR 496 for screening and selection costs, EUR 121 for posting vacancies. Recruitment costs for trainees can be expected to be similar to those of apprentices. Importantly, these costs are significantly lower than those for hiring skilled workers, which have been estimated at EUR 1600<sup>316</sup>. To obtain an updated country-level estimate of the recruitment costs, we divide the average costs estimated in Germany (EUR 600) by the average hourly labour costs in Germany in 2012 (EUR 30.5), the year of the study. This gives the average number of hours required to recruit a trainee. It corresponds to 19.7 hours of work. These are then evaluated at the average hourly labour costs of the EU MS in 2022 to obtain the average recruitment costs per trainee at the country level.

The aggregate additional costs introduced by the measures are obtained by multiplying the recruitment costs by the number of paid trainees who had traineeships longer than six months and did not remain in the company at the end of the traineeships period. Data on duration and retention come from the Eurobarometer 2023 and data on the number of trainees come from the EU-LFS. The original proposed approach of computing the recruitment costs in proportion to the contract length and to drop traineeships between six and nine months long could not be implemented since the EB only contains information on whether the traineeships lasted more than six months.

**Table 53: Estimated recruitment costs by traineeship type**

Country	Paid OMT	Paid ALMP	Paid ECT	Paid MPT	Total
EU27	2 227 1814	19 296 766	23 606 324	2 317 026	67 491 930

### Annex 3.5.6 Written Agreement

The costs of issuing a written agreement are based on time estimates from Ecorys (2023) QFT evaluation study. These include 4 hours for drafting the learning objectives of the trainees in the written agreement. Setting and drafting learning objectives is a recurrent cost per trainee, and are estimated for 2023. Information on countries where this has already been implemented is taken from the Ecorys (2023) QFT evaluation study for OMT and ALMP, and from our own legal analysis for ECT and MPT.

Taking note only of countries and traineeship types where this will create an additional cost, the two above time measures are extrapolated across Member States through average public and private sector labour costs (plus a 25% overhead) and applied to the overall number of paid trainees.

**Table 54: Costs of issuing a written traineeship agreement**

Country	Paid OMT (€)	Paid ALMP (€)	Paid ECT (€)	Paid MPT (€)	Unpaid OMT (€)	Unpaid ALMP (€)	Unpaid ECT (€)	Unpaid MPT (€)
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316 Pfeifer et al. "The Structure of Hiring Costs in Germany: Evidence from Firm-Level Data (2013). IZA DP No. 7656. 55 (2), 193-218.; We expect these costs to be higher than those for trainees since such hiring processes generally require a more thorough screening process and the involvement of a higher number of staff involved in the procedure.

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

Total EU27	22533570	86099	5965645	1855559	8516414	16154	41156228	0
Country	Total cost: paid (€)	Affected paid trainees (number)	Total cost: unpaid	Affected unpaid trainees (number)	Total (€)			
Total EU27	30440873	264780	49688796	343908	80129669			

### Annex 3.5.7 Costs of ensuring fair remuneration

#### Estimation of the current remuneration of trainees

To obtain a proxy for the current remuneration of trainees we use the result of the legal analysis, which provide information on the legal minimum level of remuneration of trainees in the Member States. In most Member States this level can be assumed to be the minimum wage (as these trainees are all considered workers under EU law because they are paid), while some Member States allow for a proportion of the minimum wage or for an actual value provided by law (e.g. for ALMP in IT trainees' minimum remuneration is set at 500 EUR, in BE and RO it is 50%, in PT at 80% of the MW).

**Table 55: Estimates of trainees' remuneration in the EU MS**

Country	Minimum remuneration linked to minimum wage (1 = 100% of the minimum wage)	Minimum wage, second semester of 2023	Average wage of people younger than 30 years old, 2022	Estimated remuneration of trainees
AT	NA	NA	2546	1528
BE	0.5	1955.04	2865	978
BG	1	398.81	900	399
CY	1	940	1381	940
CZ	1	728.67	1334	729
DE	1	1997	2566	1997
DK	1	NA	3416	2050
EE	1	725	1527	725
ES	NA	1260	1710	1026
FI	NA	NA	2889	1734
FR	1	1747.2	2340	1747
GR	1	910	NA	910
HR	1	700	1120	700
HU	1	623.77	1275	624
IE	1	1909.7	2989	1910
IT	1	NA	2064	500
LT	1	840	1720	840
LU	0.4	2508.24	3493	1003
LV	1	620	1435	620
MT	1	835.16	1789	835
NL	1	1995	2209	1995
PL	2	811.03	1254	1622
PT	0.8	886.67	1094	709
RO	0.5	604.41	1176	604
SE	NA	NA	3129	1878
SI	NA	1203.36	1624	1137
SK	1	700	1342	700

Note: The table shows the estimated average remuneration of traineeships in the EU MS. In most of the countries trainees' remuneration is assumed to be equal to the MW or, when allowed by the national regulatory framework, a proportion of the MW. In SI and ES, we assume that trainees are paid 70% and 60% of the wage of comparable workers, the minimum established amount in the two countries, respectively. In IT, the minimum allowance is EUR 300 but it is higher in some regions based on State-Regions agreements. We

assume trainees are paid EUR 500. Last, in AT, DK, FI and SE (which do not have a minimum wage), we assume that trainees are paid 60% of the wage of people younger than 30 years of age.

## Benchmark remuneration and gap

Following the practice in the 2 MS where provisions on proportionate remuneration exist in relation to a comparable worker (SI and ES)<sup>317</sup>, a sensitivity analysis could be conducted by setting the benchmark level for fair/proportionate remuneration for OMT to a) minimum wage, b) 60% of the average remuneration of employees aged less than 30 years old. Given the different nature of these types of traineeships, we assume that ALMP, ECT and MPT would not be paid above the minimum wage in all the scenarios.

## Calculating the cost of the measure on fair/proportionate remuneration

The difference between the benchmark for fair/proportionate remuneration and the estimation of the current minimum remuneration of trainees can provide a range for the rough estimate of the cost of this measure per trainee per month. The product between the cost per trainee and the number of trainees who do not receive fair remuneration gives the aggregate monthly costs of ensuring fair remuneration to trainees. The fraction of paid trainees receiving unfair remuneration is obtained from the 2023 Study Supporting the Evaluation of the Quality Framework for Traineeships. In the survey of trainees conducted for the study, respondents were asked whether they considered their compensation value to be adequate relative to the national minimum wage and whether their compensation was sufficient to cover basic living costs such as rent, food, etc. 54% of the participants considered their financial allowance/compensation below the minimum wage, while 22% reported that their compensation was not at all sufficient to cover basic living expenditures. We construct three alternative scenarios based on the fraction of trainees currently receiving unfair remuneration (namely 22%, 38% and 54%). The product between the fraction of trainees receiving unfair remuneration and the number of paid trainees estimated through the EU-LFS data gives an estimate of the number of trainees receiving an inadequate/unfair remuneration. Last, the monthly costs of ensuring fair remuneration to trainees are multiplied by the country specific average traineeships duration taken from the Eurobarometer survey<sup>318</sup>. Under the assumption that trainees would be paid the minimum legal requirement over the baseline period, the aggregate cost of the measure during the baseline period can be obtained by multiplying the cost per trainee by the predicted number of paid traineeships in the EU.

An upper bound to the costs of extending fair remuneration to unpaid trainees can be obtained by multiplying the number of unpaid trainees from the EU-LFS (1,455,631 trainees in 2019) by the two measures (MW, 60% of the average remuneration of employees aged less than 30 years old) of fair/proportionate remuneration and multiplying the monthly costs by the country specific average length of traineeships duration from the Eurobarometer survey. Importantly, in the intermediate and conservative scenarios it is assumed that only OMT would be paid a fraction of the average remuneration of employees aged less than 30 years old. The benchmark level of remuneration for ALMP is set at the minimum wage in all the scenarios. We also assume that 22% of unpaid ECT would be affected and paid the benchmark wage. By adding these costs to the estimated costs from ensuring fair/proportionate remuneration for paid trainees we obtain an upper bound of the total costs of ensuring fair remuneration to all trainees in the EU, regardless of their legal status.

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317 In ES, the remuneration of trainees should be at least 60%-75% (depending on duration) of the remuneration of a comparable worker as established in the respective collective agreement. In SI the law states that the trainee has the right to at least 70% of the remuneration of a comparable worker.

318 In the Eurobarometer 2023 survey, duration is a categorical variable with values: "less than one month", "between one and three months", "between three and six months", "more than six months". For each of these categories, we considered the median value to compute the average traineeships duration in each country. Traineeships longer than six months were assumed to be six months long.

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

The upper bound corresponds to a situation where all MS implement the recommendation. However, since not all MS are expected to implement the recommendation, we perform a sensitivity analysis in which we assume that (i) that only 9 out of 27 MS will implement the initiative in the respective national regulatory framework<sup>319</sup> (ii) 17 out of 27 MS will implement the initiative. To obtain an estimate of the costs under these scenarios, we multiply the aggregate costs of ensuring fair remuneration to paid and unpaid (the prior method always assumed full implementation for the measure on paid trainees) trainees across the EU MS under the three scenarios in the above by 33% and 66%, respectively.

**Table 56: Total costs of measure on fair remuneration**

	22% of trainees; absolute number: 353.105		38% of trainees; absolute number: 609.909		54% of trainees; absolute number: 866.712	
	Minimum Wage Scenario	Costs under the 60% wage benchmark	Minimum Wage Scenario	Costs under the 60% wage benchmark	Minimum Wage Scenario	Costs under the 60% wage benchmark
Paid	41 165 345	81 007 850	71 103 780	139 922 644	101 042 213	198 837 446
Unpaid	2 193 762 413	2 112 791 415	2,193,762,413	2 112 791 415	2 193 762 413	2 112 791 415
Total	2 234 927 758	2 193 799 265	2 264 866 193	2 252 714 059	2 294 804 626	2 311 628 861
Conservative scenario (33%)	744 975 919	731 266 422	754 955 398	750 904 686	764 934 875	770 542 954
Optimistic scenario (66%)	1 489 951 839	1 462 532 843	1 509 910 795	1 501 809 373	1 529 869 751	1 541 085 907
Total	2 234 927 758	2 193 799 265	2 264 866 193	2 252 714 059	2 294 804 626	2 311 628 861

## Annex 3.6. Detailed approach and methodology for stakeholders consultations

In the following, we describe the approach and methodology for the various stakeholder consultation activities.

### Annex 3.6.1 Interview methodology

As part of the stakeholder consultation, the research team has conducted interviews to gather input on the current context and issues relating to the quality of traineeships as well as the potential impacts of policy options. Interviews were conducted using a semi-structured approach, which is commonly used to collect qualitative data. Using semi-structured interviews allows for asking comparable questions across interviews but also leaves space for the conversation to develop according to the expertise of the interviewee. This method is therefore highly useful to gather first-hand information, comparable data

<sup>319</sup> This corresponds to the number of countries that introduced the least implemented QFT principle in their national regulatory framework for OMT according to the Ecorys (2023) Study Supporting the Evaluation of the QFT.



**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

and good insights into a specific issue or situation and allows capturing the latest developments as well as long-term trends and underlying drivers. Interviews are suitable for a range of stakeholders, both public and private, and both for individual entities and associations. Furthermore, past experience of the research team with this method has shown that direct contact with interviewees contributes to increasing trust, resulting in high-quality responses and more complete information. Finally, interviews allow the researcher to validate statements in real time.

Semi-structured interviews were conducted with a number of different stakeholders and experts at the EU level. These interviews particularly sought to focus on aspects not covered by the previous evaluation of the 2014 QFT, to avoid duplicating information. The aim of the interviews was to:

1. gather stakeholders and experts' input on existing challenges related to the identified problem(s), including on the quality of traineeships, and depending on the stakeholder, the policy options;
2. collect stakeholders' and experts' insights on the potential impact of the different policy options to be assessed

Consequently, interviews were conducted in two waves. A first wave of inception interviews was carried out at the start of the project. This wave of interviews primarily addressed the issues in (i). These interviews were particularly connected to the problem definition and related drivers identified at the outset of the project, to establish stakeholder perspectives on traineeship quality, particularly aspects that are complementary to what has already been addressed in the 2023 QFT evaluation, such as cross-border traineeships and bogus traineeships. Particular emphasis was also put on socio-economic inequalities in access to (quality) traineeships and resulting long-term labour market disadvantage. The second wave of interviews was focused on the current challenges and context, but also on the impact of policy options as set out in (ii). The stakeholders were asked to provide their assessment of the policy options identified to address the quality of traineeships in Europe, as well as their opinion about their potential impact. These interviews especially sought to emphasize aspects or elements of the options that cannot easily be quantitatively estimated as part of the cost-benefit analysis (CBA). For instance, this included the second-order effects of increasing remuneration and social security of trainees for businesses, particularly SMEs. The interviews were also used to identify additional relevant data and literature on the issue as well as further relevant stakeholders to be involved in the assessment.

Overall, 13 semi-structured interviews were conducted at the EU level. A range of stakeholders were targeted, including EU policymakers, EU social partners and European youth organisations, as well as experts. A particular focus was also placed on the sectoral dimension, with interviews targeting a number of sectoral social partners. Table 57 below provides a summary of the number and type of stakeholders interviewed for the study.

**Table 57: Summary of EU-level interviews**

Type of stakeholder	Inception interviews		Wave 2 interviews	
	Contacted	Interviewed	Contacted	Interviewed
Employer organisation	1	1	5	3
Trade union	1	0	4	2
EU institutions and policymakers	1	1	0	0
Youth organisations	1	0	2	2

## STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

Experts	1	1	1	1
EU institutions as employers	0	0	2	2
Total	5	3	14	10

### Annex 3.6.2 Interview questionnaire

Below we present the interview questionnaire used for the semi-structured interviews. Questions were adapted depending on the stakeholder interviewed and the timing of the interview.

#### Introduction

This interview is carried out in the framework of a **Study exploring the context, challenges and possible solutions in relation to the quality of traineeships in the EU (VS/2022/0047)**. The project is **commissioned by the Directorate-General for Employment, Social Affairs and Inclusion, European Commission (EC)**. The project is part of the Multiple Framework Contracts EMPL/2020/OP0016 for the provision of services related to the implementation of Better Regulation guidelines.

For the purpose of this study, a traineeship is 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 the transition to regular employment”<sup>320</sup>. This includes:

- Open market traineeships taking place under an agreement between the employer and the trainee and some form of work contract, but without necessarily being remunerated.
- ALMP traineeships involving an agreement between three stakeholders – employer, trainee and Public Employment services – without necessarily requiring a work contract and remuneration, although the trainee could receive some form of allowance or benefits, whereas the employer may receive some form of subsidy.
- Educational traineeships (i.e. that are part of educational curricula)
- Traineeships that are mandatory to access specific professions (e.g. doctors, lawyers).

Traineeships can be an important formative labour market experience for young people. However, how useful traineeships are to both employees and employers depends on their quality, including remuneration, working conditions, social protection coverage and learning content, as well as whether traineeships are (mis)used instead of regular work”. The purpose of the present study is to collect evidence on the use of traineeships as well as their quality in the EU.

The purpose of this interview is to gather input from key stakeholders on the key problems/challenges and their drivers relating to the quality of traineeships in the EU, as well as potential ways to address these issues at EU level.

The information provided during this interview will remain confidential. Final results will be presented in aggregate or anonymous form. Upon the respondent’s agreement, the interview may be recorded to enable a transcript solely for research purposes.

<sup>320</sup> <https://eur-lex.europa.eu/legal-content/SWD/qid=1673374811041>.

## Questions

### **A. Policy context and challenges regarding the quality of traineeships (questions to be distinguished between type of traineeship discussed)**

A1. What do you perceive as the most significant problems regarding the quality of traineeships in the EU. What are the reasons behind these problems?

A2. To what extent do you believe that traineeships offer learning opportunities for trainees and therefore encourage skills development?

A3. Are there examples of current (MS) practices on strengthening the learning content of traineeships that you would highlight?

A4. In your view, what distinguishes the tasks and responsibilities of trainees from those of entry-level employees (e.g. task complexity, workload, level of independence)? How does the learning component of the work differ between the 2 types of engagement?

A5. How significant do you consider the issue of bogus traineeships (i.e. regular (entry-level) employee positions that are disguised as traineeships)? What would you consider as concrete indications that could be used to identify such bogus traineeships?

A6. What kinds of practices exist at national level for inspection and enforcement of national traineeship and labour laws, as well as channels for reporting malpractice? Can you name specific examples and best practices? Or are inspections and enforcement not functioning well?

A7. Are you aware of any other (MS) measures to prevent and combat bogus traineeships (except inspection and enforcement measures)?

A8. Which factors drive or inhibit take up of cross-border traineeships?

A9. Are you aware of current practices and methods to support remote or hybrid traineeships? What obstacles exist in this regard?

A10. Do you think challenges exist regarding the working conditions of trainees. If yes, regarding which aspects (e.g. remuneration, access to social protection)? Can you elaborate?

A11. What do you think would be a fair remuneration/compensation of trainees in relation to regular employees in a company? On what criteria should this level of remuneration be decided?

A12. Do you think (or are you aware of evidence) that young people from vulnerable groups (i.e. disadvantaged economic background, migrant background or with a disability) face larger obstacles to accessing traineeship opportunities?

### **B. Assessment of impacts of potential ways to address the quality of traineeships in the EU**

#### **Introduction/background:**

Issues related to the quality of traineeships could be addressed in different ways. A number of ways to address the identified challenges can be envisaged. For the purposes of this interview, we have categorised these measures under three potential areas for EU action.

For each area, we would like to discuss with you some potential policy measures, to identify their potential benefits and costs for different stakeholder groups.

Below are some examples of areas that such measures may impact, which you may want to discuss.

- The earnings and social protection of trainees
- The supply of traineeships (i.e. the number of individuals seeking traineeships)
- The demand for traineeships (i.e. the number of employers offering traineeships)
- The employability, skills and longer-term career prospects of trainees
- The number of bogus traineeships
- Compliance costs associated with the implementation of measures for businesses
- The competitiveness of businesses
- Implementation and enforcement challenges for public administration
- Specific impacts of the measures on small and medium enterprises
- Socio-economic inequality in access to (quality) traineeships
- Take-up of cross-border traineeships

**Interview questions start here:**

**1. Types of traineeships covered by the Recommendation on a Quality Framework for Traineeships (hereafter ‘QFT’)**

The existing QFT recommendation applies to open-market traineeships and traineeships that are part of active labour market policies. However, **traineeships that are part of formal education or training programmes** represent the majority of traineeships in many countries. Their exclusion from the scope of the QFT might limit the coherence of the QFT with other programmes and policy areas at national and regional levels.

At the same time, **traineeships whose content is regulated under national law and whose completion is a mandatory requirement to access a specific profession** (e.g. teaching, law, medicine, architecture, etc.) could also benefit in terms of quality if they were covered by the QFT.

A potential EU initiative on traineeships **could envisage extending the scope** of the QFT to traineeships that are part of formal **education and training curricula** and to traineeships that are a **mandatory part of professional training**.

From your organization’s perspective,

- What would be the benefits of such a potential policy measure? Which groups would be most positively affected and how?
- What would be the costs of such a potential policy measure? Which groups would be most negatively affected and how?
- Feel free to draw on any past experience or current practices (in MS) you are aware of in your discussion of costs and benefits.
- What would happen to trainees doing these traineeships if there were no new policy measures addressing this aspect (i.e. if the scope remained as it is now)?

## 2. Problematic use of traineeships

In certain cases, **different problematic uses of traineeships** are observed in the EU. With problematic use we mean traineeships of poor quality, traineeships which are non-compliant with EU or national law, and bogus traineeships (i.e. regular (entry-level) jobs disguised as traineeships).

A clearer common understanding at EU level of what constitutes a traineeship could facilitate **implementation of the QFT through national law, tackle the misuse of traineeships to replace regular employment** and ensure greater coherence in Member States' regulatory approaches.

To address such problematic uses of traineeships, a potential EU initiative could foresee one or several of the following options:

- support Member States in determining bogus traineeships on the basis of commonly agreed indications/criteria
- Support Member States in the **enforcement of existing rights of workers granted under EU and national law**, in order to ensure that trainees, including those in a situation of disguised employment (bogus traineeships), can access all the labour and social protection rights they are entitled to under EU law, national law, collective agreements, or established practice
- Create **channels for reporting of malpractice and poor traineeship conditions** during and after the traineeship period
- Set a **minimum or maximum duration** of traineeships and/or of **specific conditions for their renewal or prolongation**
- Put a **ban on successive traineeship** with the same traineeship provider
- **Stronger cross-cutting coordination** with education and social policies at national and regional level and better involvement of key stakeholders
- **Robust and comparable data** on the prevalence, quality and nature of traineeships in Member States.

From your organization's perspective,

- What would be the benefits of **each of these potential policy measures**? Which stakeholder groups would be positively most affected and how?
- What would be the costs of **each of these potential policy measures**? Which stakeholder groups would be negatively most affected and how?

Feel free to draw on any past experience or current practices (in Member States) you are aware of in your discussion of costs and benefits.

- What would happen in the absence of adoption of such policy measures, and if the problematic use would continue?

## 3. Remuneration, access to social protection and other quality aspects of traineeships

The QFT covers a **wide range of quality principles**, which the recent evaluation demonstrated to be still relevant. However, the evaluation of the QFT has shown that many stakeholders consider that several essential quality features of traineeships are not included, in particular fair remuneration and access to social protection. Moreover, it showed that there is room to adapt the content of the QFT in the context of the green and digital transformation of the labour market.

To this end, an EU initiative could **propose fair remuneration and access to social protection for trainees**.

From your organization's perspective,

- What would be the benefits of such a potential policy measure? Which groups would be most positively affected and how?
- What would be the costs of such a potential policy measure? Which groups would be most negatively affected and how?
- Feel free to draw on any past experience or current practices (in MS) you are aware of in your discussion of costs and benefits.
- What would be the consequences for trainees in the absence of adoption of such policy measures?

### **C. Concluding questions**

C1. Are there any remaining issues that you would like to raise?

C2. Do you know of any important documentation (policy reports, pilot studies, impact assessment studies, research articles, data or statistics on the topic etc.) that you consider relevant for our study?

## **Annex 3.6.3 Survey methodology**

An online survey was carried out among national stakeholders to collect data on how current practices of businesses regarding traineeships, as well as to identify relevant national measures and understand how these approaches are positively influencing the overall quality of traineeships. The survey was targeted to national public authorities, national business/employer associations, businesses (traineeship providers), national trade unions, national youth organisations, civil society organisations and educational institutions. The survey targeted at least one representative of each stakeholder category by Member States.

The survey was disseminated through email invites and publications on social media (LinkedIn). Business associations were invited to disseminate the survey to their member companies. The survey included separate questionnaires for each stakeholder category with a mix of closed and open questions. The survey was available in all EU languages and ran online on Qualtrics from 15th June 2023 to 8th September 2023.

The questionnaires of the survey for each stakeholder category are presented below.

### **Introduction**

In 2014, a Council Recommendation established a Quality Framework for Traineeships (QFT). In the context of the 2023 European Year of Skills, the Commission Work Programme announced an “update of our quality framework for traineeships to address issues including fair remuneration and access to social protection”. The present study, conducted by CEPS and Open Evidence, aims to support the European Commission (DG EMPL) in improving the policy framework for quality traineeships in the EU and will assess the existing problems and explore options and impacts of a potential EU initiative on quality traineeship.

The study covers four types of traineeships:

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

- Open market traineeships: non-mandatory traineeships based on bilateral and private agreements between a trainee and a traineeship provider.
- Active Labour Market Policy (ALMP) traineeships: offered to (young) unemployed to increase their employability/skills and support their transition to the labour market. A public employment service is usually acting as intermediary between the trainee and the traineeship provider.
- Student traineeships: formal part of a curriculum. These are different from apprenticeships, which are systematic, long-term training alternating periods at the workplace and in an educational institution.
- Traineeships that are a mandatory requirement to access specific professions (e.g. doctors)

**Businesses (traineeship providers)**

Survey questions to businesses	Answers
1. <b>Respondent information. This information will only be used for the study and will not be publicly disclosed.</b>	<ul style="list-style-type: none"> <li>• Name of company (open answer)</li> <li>• Name of respondent (open answer)</li> <li>• Role in the company (open answer)</li> <li>• Email (open answer)</li> <li>• I agree to be contacted by the study team for further questions (yes/no).</li> </ul>
2. <b>In which country is your company based? (single choice answer)</b>	<ul style="list-style-type: none"> <li>• List of countries</li> </ul>
3. <b>In which sector is your company active? (single choice answer)</b>	<ul style="list-style-type: none"> <li>• Financial &amp; insurance activities</li> <li>• Construction</li> <li>• Professional, scientific &amp; technical activities</li> <li>• Wholesale &amp; retail trade, transport, accommodation &amp; food</li> <li>• Public sector / administration</li> <li>• Information &amp; communication</li> <li>• Industry (except construction)</li> <li>• Agriculture, forestry &amp; fishing</li> <li>• Arts, entertainment &amp; recreation</li> <li>• Health &amp; social work</li> <li>• Education</li> <li>• Other (please specify)</li> </ul>
4. <b>How many employees does your company have? (single choice answer)</b>	<ul style="list-style-type: none"> <li>• Less than 10</li> <li>• 11-50</li> <li>• 51-250</li> <li>• More than 250</li> </ul>
5. <b>In your company, do you have or have you had trainees in the last five years from the following categories? (matrix question, single choice answers)</b>	<p><b>Columns:</b></p> <ul style="list-style-type: none"> <li>• Open market traineeships (non-mandatory traineeships based on bilateral and private agreements between a trainee and a traineeship provider)</li> <li>• ALMP traineeships (offered to unemployed people to support the transition to the labour market, with the public employment service acting as intermediary)</li> <li>• Student traineeships that are formal part of curriculum</li> <li>• Traineeships that are mandatory to access specific professions (e.g. lawyers, doctors):</li> </ul> <p><b>Rows:</b></p> <ul style="list-style-type: none"> <li>• Yes (please specify how many at the same time)</li> <li>• No</li> <li>• Do not know/N.A</li> </ul>
6. <b>(If the answers are 'no' to all questions in Q5) Why did you not take any trainees in the last five years? Please rank the following reasons from most important to least important (ranking)</b>	<ul style="list-style-type: none"> <li>• Difficult to find/recruit trainees</li> <li>• We did not receive trainee applications</li> <li>• Cost and administrative burden to recruit trainees</li> <li>• Time-consuming to train trainees</li> <li>• Other (please specify)</li> <li>• Do not know/N.A</li> </ul>
7. <b>(If at least one reply is 'yes' in Q5) Please indicate why you had or have</b>	<ul style="list-style-type: none"> <li>• Training trainees that could potentially be hired after the traineeship</li> </ul>

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

Survey questions to businesses	Answers
<p><b>trainees in your company. (multiple choice answer)</b></p>	<ul style="list-style-type: none"> <li>• The incentives/subsidies received from the public employment service or local authorities</li> <li>• Connecting with a university that may provide a pool of further recruits</li> <li>• Short-term traineeship contracts offer more flexibility for human resource management</li> <li>• Other (please specify)</li> <li>• Do not know/N.A</li> </ul>
<p><b>8. What are the benefits of having trainees for your company?. (Likert scale from 1. Very important to 5. Not important at all)</b></p>	<ul style="list-style-type: none"> <li>• Contribution to increased productivity of the company</li> <li>• Developing mentors' managerial skills</li> <li>• Lower costs of labour for entry level tasks</li> <li>• Lower cost for future recruitment of trained workers</li> <li>• Better performance of subsequently-retained trainees compared to new hires for the same role</li> <li>• Innovation in methods or tools brought by the trainees</li> <li>• Improved reputation and attractiveness of the company</li> <li>• Other (please specify)</li> </ul>
<p><b>9. (If at least one reply is 'yes' in Q5) In the last five years, what is the average share per year of trainees in your company out of the number of employees? (single choice answer)</b></p>	<ul style="list-style-type: none"> <li>• 0-5%</li> <li>• 6-10%</li> <li>• 11-15%</li> <li>• 16-20%</li> <li>• More than 20%</li> <li>• Do not know/N.A</li> </ul>
<p><b>10. (If at least one reply is 'yes' in Q5) To what extent are the tasks of trainees in your company different from the tasks of entry-level employees? (matrix question, single choice answers)</b></p>	<p><b>Columns:</b></p> <ul style="list-style-type: none"> <li>• Open market traineeships (non-mandatory traineeships based on bilateral and private agreements between a trainee and a traineeship provider)</li> <li>• ALMP traineeships (offered to unemployed people to support the transition to the labour market, with the public employment service acting as intermediary)</li> <li>• Student traineeships that are formal part of curriculum:</li> <li>• Traineeships that are mandatory to access specific professions (e.g. lawyers, doctors)</li> </ul> <p><b>Rows</b></p> <ul style="list-style-type: none"> <li>• Very different (please specify)</li> <li>• Somewhat different (please specify)</li> <li>• The same</li> <li>• Do not know/N.A</li> </ul>
<p><b>11. (If at least one reply is 'yes' in Q5) Do trainees in your company receive the following benefits? (matrix question, single choice answer on remuneration, multiple choice answer on social protection)</b></p>	<p>Remuneration (single choice answer):</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul> <p>Social protection (multiple choice answer):</p> <ul style="list-style-type: none"> <li>• Sickness and healthcare benefits</li> <li>• Accident insurance</li> <li>• Maternity and paternity benefits</li> <li>• Entitlement to unemployment benefits after the traineeship</li> <li>• Pension contribution</li> </ul>
<p><b>12. (If at least one reply is 'yes' in Q5 and in Q11) Do you provide any of the benefits you indicated above based on: (multiple choice answer)</b></p>	<ul style="list-style-type: none"> <li>• Mandatory requirement by law</li> <li>• The traineeship type (i.e. open market traineeship, ALMP traineeships, student traineeships, traineeships to access a profession (please specify which ones))</li> <li>• Minimum duration of the traineeship (please specify the minimum duration from which you provide remuneration/social protection to the trainee)</li> <li>• The level of education/experience of the trainee (please specify)</li> <li>• The respective importance of the tasks/responsibilities and the training component</li> <li>• Other (please specify)</li> <li>• Do not know/N.A</li> </ul>



**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

Survey questions to businesses	Answers
<p><b>13. (If at least one reply is 'yes' in Q5, and the reply to 'remuneration' in Q11 is 'yes') Can you specify the amount of remuneration provided? Please respond for the type of traineeships that are relevant to you? (matrix question, single choice answers)</b></p>	<p><b>Columns:</b></p> <ul style="list-style-type: none"> <li>• Open market traineeships (non-mandatory traineeships based on bilateral and private agreements between a trainee and a traineeship provider)</li> <li>• ALMP traineeships (offered to unemployed people to support the transition to the labour market, with the public employment service acting as intermediary)</li> <li>• Student traineeships that are formal part of curriculum:</li> <li>• Traineeships that are mandatory to access specific professions (e.g. lawyers, doctors)</li> </ul> <p><b>Rows:</b></p> <ul style="list-style-type: none"> <li>• Above minimum wage (please specify in % of minimum wage)</li> <li>• At minimum wage level</li> <li>• Below minimum wage (please specify: 1) level in % of minimum wage) 2) criteria used for setting the level)</li> <li>• Do not know/N.A</li> </ul>
<p><b>14. If the following measures became mandatory (and were not mandatory before in your country), to what extent would this affect the number of trainees you would take? (matrix question, single choice answers)</b></p>	<p><b>Columns</b></p> <ul style="list-style-type: none"> <li>• Mandatory remuneration of trainees</li> <li>• Mandatory requirement to set remuneration at minimum wage level</li> <li>• Mandatory provision of social protection to trainees</li> <li>•</li> </ul> <p><b>Rows</b></p> <ul style="list-style-type: none"> <li>• We would take more trainees (please explain why)</li> <li>• We would take the same number of trainees</li> <li>• We would take fewer trainees (please explain why)</li> <li>• N/A/Already mandatory in my country</li> <li>• Do not know</li> </ul>
<p><b>15. (If at least one reply is 'yes' in Q5) Do you offer recurrent (at least two consecutive) traineeship possibilities at your company? (matrix question, single choice answers)</b></p>	<p><b>Columns</b></p> <ul style="list-style-type: none"> <li>• Recurring traineeship possibilities for the same person</li> <li>• Recurring traineeship possibilities for the same role</li> </ul> <p><b>Rows</b></p> <ul style="list-style-type: none"> <li>• Never</li> <li>• Under certain conditions (please specify why)</li> <li>• Always (please specify why)</li> <li>• Other (please explain)</li> <li>• Do not know/N.A</li> </ul>
<p><b>16. (If at least one reply is 'yes' in Q5) In general, how long are the traineeship contracts offered by your company, please respond according to the type of traineeship you offer(ed)? (matrix question, single choice answers)</b></p>	<p><b>Columns:</b></p> <ul style="list-style-type: none"> <li>• Open market traineeships (non-mandatory traineeships based on bilateral and private agreements between a trainee and a traineeship provider)</li> <li>• ALMP traineeships (offered to unemployed people to support the transition to the labour market, with the public employment service acting as intermediary)</li> <li>• Student traineeships that are formal part of curriculum:</li> <li>• Traineeships that are mandatory to access specific professions (e.g. lawyers, doctors)</li> </ul> <p><b>Rows:</b></p> <ul style="list-style-type: none"> <li>• Up to 3 months</li> <li>• Between 4 and 6 months</li> <li>• Between 7 and 12 months</li> <li>• More than 12 months</li> <li>• Do not know/N.A</li> </ul>

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

Survey questions to businesses	Answers
17. (If the response to Q16 is 'between 7 and 12 months' or 'more than 12 months') If the maximum duration of open-market traineeships was limited (e.g. to 6 months), to what extent would this affect the number of trainees that you would take? (single choice answer)	<ul style="list-style-type: none"> <li>• We would take more trainees (please explain why)</li> <li>• We would take the same number of trainees</li> <li>• We would take fewer trainees (please explain why)</li> <li>• Do not know</li> <li>• N/A</li> </ul>
18. (If at least one reply is 'yes' in Q5) On average in the last five years, what share of trainees was hired in your company after their traineeship ended? (single choice answer)	<ul style="list-style-type: none"> <li>• 0-20%</li> <li>• 21-40%</li> <li>• 41-60%</li> <li>• 61-80%</li> <li>• 81-100%</li> <li>• Do not know/N.A</li> </ul>
19. (If at least one reply is 'yes' in Q5 and in Q11) How much time does it take to conduct the following activities (for each trainee)? When it is not your task, indicate N.A (open answers)	<ul style="list-style-type: none"> <li>• Registering the trainee to payroll including preparatory work: (specify time in hours)</li> <li>• Registering the trainee to social security, if different from payroll registration: (specify time in hours)</li> <li>• Registering the trainee to healthcare or accident insurance, if different from social security: (specify time in hours)</li> </ul>
20. (If at least one reply is 'yes' in Q5, and at least one reply to 'social protection' in Q11 is 'yes') How much does it cost your company on average per month to provide social protection for one trainee? When it is not your task, indicate N.A (open answers)	<ul style="list-style-type: none"> <li>• Coverage of trainees by sickness and healthcare benefits (specify amount in EUR)</li> <li>• Coverage of trainees by accident insurance (specify amount in EUR)</li> <li>• Coverage of trainees by maternity and paternity benefits (specify amount in EUR)</li> <li>• Entitlement of trainees to unemployment benefits after the traineeship ends (specify amount in EUR)</li> <li>• Pension contribution for trainees (specify amount in EUR)</li> <li>• Coverage of trainees by all branches of social protection (sickness and healthcare insurance, accident insurance, maternity and paternity benefits, unemployment benefits, pensions) (specify amount in EUR)</li> </ul>
21. (If at least one reply is 'yes' in Q5) In your company, do you provide a mentor to the trainees? (single choice answer) N.B. Mentor is different than supervisor or line manager, but is rather a person who gives a younger or less experienced person help and advice	<ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>
22. (If at least one reply is 'yes' in Q5 and the answer to Q21 is 'yes') What is the role of the mentor of a trainee in your company? (multiple choice answer)	<ul style="list-style-type: none"> <li>• Providing explanations to the trainee on the requested tasks</li> <li>• Providing training and guidance to enhance skills</li> <li>• Providing feedback to the trainee</li> <li>• Providing coaching and advice for the trainee, e.g. on recruitment opportunities within the company</li> <li>• Other (please specify)</li> <li>• Do not know/N.A</li> </ul>
23. (If at least one reply is 'yes' in Q5 and the answer to Q21 is 'yes') How much time per trainee does a mentor spend per week for these tasks? (single choice answer)	<ul style="list-style-type: none"> <li>• Less than 1 hour</li> <li>• 1-2 hours</li> <li>• 3-4 hours</li> <li>• More than 4 hours</li> <li>• Do not know/N.A</li> </ul>
24. (If at least one reply is 'yes' in Q5) How do you ensure that the trainee can acquire the skills needed for your company? (multiple choice answer)	<ul style="list-style-type: none"> <li>• Defining the learning and training objectives at the beginning of the traineeship</li> <li>• Clear instructions and follow-up by a supervisor</li> <li>• With mentoring by a dedicated person</li> <li>• Delivering a skill certificate at the end of the traineeship</li> <li>• Other (please specify)</li> <li>• Do not know/N.A</li> </ul>
25. (If at least one reply is 'yes' in Q5) In your company, do you currently have or have you had in the past any trainee from another EU country? (single choice answer)	<ul style="list-style-type: none"> <li>• Yes</li> <li>• No (please explain why not)</li> </ul>
26. (If at least one reply is 'yes' in Q5 and the reply to Q25 is 'yes') How did you facilitate this cross-border traineeship? (multiple choice answer)	<ul style="list-style-type: none"> <li>• By publishing the vacancy on EURES</li> <li>• By publishing the vacancy on another European job portal (please specify)</li> </ul>

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

Survey questions to businesses	Answers
	<ul style="list-style-type: none"> <li>• By publishing the vacancy on universities networks (please specify)</li> <li>• By using an Erasmus + grant</li> <li>• Other (please specify)</li> <li>• Do not know/N.A</li> </ul>
<p><b>27. In your view, what public initiatives could raise employers' awareness about how to achieve good quality of traineeships, for the company and the trainee? Please rank from most to least effective (ranking)</b></p>	<ul style="list-style-type: none"> <li>• Publications on public authority website</li> <li>• Outreach/communication of national authorities to business associations and trade unions</li> <li>• Outreach/communication of employer organisations to businesses</li> <li>• Public information campaigns</li> <li>• Workshops and events</li> <li>• Other (please specify)</li> <li>•</li> </ul>

**Public authorities**

Survey questions to public authorities	Answers
<p><b>1. Respondent information. This information will only be used for the study and will not be publicly disclosed.</b></p>	<ul style="list-style-type: none"> <li>• Name of organisation (open answer)</li> <li>• Name of respondent (open answer)</li> <li>• Role in the organisation (open answer)</li> <li>• Email (open answer)</li> <li>• I agree to be contacted by the study team for further questions (yes/no).</li> </ul>
<p><b>2. In which country is your organisation based? (single choice answer)</b></p>	<ul style="list-style-type: none"> <li>• List of countries</li> </ul>
<p><b>3. What activities have been implemented by public authorities in your country to raise awareness of employers, including SMEs, on the QFT and any national measures on the quality of traineeships? (multiple choice answer)</b></p>	<ul style="list-style-type: none"> <li>• Publications on public authority website</li> <li>• Outreach/communication to employer organisations and trade unions</li> <li>• Public information campaign</li> <li>• Workshops and events</li> <li>• Other (please specify)</li> <li>• Do not know/N.A</li> </ul>
<p><b>4. How are the QFT principles and national measures on quality of traineeships enforced in your country? (multiple choice answer)</b></p>	<ul style="list-style-type: none"> <li>• Based on inspections (please provide more information on the number, frequency, scope of inspections)</li> <li>• Based on complaints received (please specify from whom and whether there are systems in place for trainees, youth organisations or trade unions to report issues with traineeships)</li> <li>• Other (please specify)</li> <li>• Do not know</li> <li>• N.A</li> </ul>
<p><b>5. Are there data collected on the number of traineeships in your country? (matrix question, single choice answers)</b></p>	<p><b>Columns</b></p> <ul style="list-style-type: none"> <li>• Open market traineeships (non-mandatory traineeships based on bilateral and private agreements between a trainee and a traineeship provider)</li> <li>• ALMP traineeships (offered to unemployed people to support the transition to the labour market, with the public employment service acting as intermediary)</li> <li>• Student traineeships that are formal part of curriculum:</li> <li>• Traineeships that are mandatory to access specific professions (e.g. lawyers, doctors)</li> </ul> <p><b>Rows</b></p> <ul style="list-style-type: none"> <li>• Yes (please specify by whom and add link)</li> <li>• No</li> <li>• Do not know</li> <li>• N.A</li> </ul>
<p><b>6. Are there any measure implemented in your country to improve the accessibility of</b></p>	<ul style="list-style-type: none"> <li>• Yes (please specify)</li> <li>• No</li> <li>• Do not know/N.A</li> </ul>

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

Survey questions to public authorities	Answers
<p>traineeships to vulnerable groups (e.g. persons with disabilities, from minorities or low economic background)? (single choice answer)</p>	
<p>7. (If the answer to Q6 is 'yes') To what extent have these measures increased the accessibility and take up of traineeships by vulnerable groups? (matrix question, single choice answers)</p>	<p><b>Columns</b></p> <ul style="list-style-type: none"> <li>• Persons with disabilities</li> <li>• Persons with low socio-economic background</li> <li>• Persons from (ethnic, religious, sexual) minorities</li> </ul> <p><b>Rows</b></p> <ul style="list-style-type: none"> <li>• To a great extent</li> <li>• To a moderate extent</li> <li>• To a small extent</li> <li>• To no extent</li> <li>• Do not know</li> <li>• N.A</li> </ul>
<p>8. Are there any measure implemented in your country to ensure that traineeships are a learning experience for trainees? (single choice answer)</p>	<ul style="list-style-type: none"> <li>• Yes (please specify which measures)</li> <li>• No</li> <li>• Do not know/N.A</li> </ul>
<p>9. (If the answer to Q8 is 'yes') To what extent do these measures ensure that trainees acquire skills that facilitate their entry into the labour market? (single choice answer)</p>	<ul style="list-style-type: none"> <li>• To a great extent</li> <li>• To a moderate extent</li> <li>• To a small extent</li> <li>• To no extent</li> <li>• Do not know</li> <li>• N.A</li> </ul>
<p>10. To what extent do you believe that the replacement of regular employment by traineeships is common in your country? (single choice answer)</p>	<ul style="list-style-type: none"> <li>• Very common</li> <li>• Somewhat common</li> <li>• Not common</li> <li>• Do not know/N.A</li> </ul>
<p>11. If any of these measures are already in place in your country, to what extent do you agree/disagree with the following statement: 'These measures reduce the risk that traineeships replace regular employment' (for measures not in place in your country, indicate N.A) (matrix question, single choice answers)</p>	<p><b>Columns</b></p> <ul style="list-style-type: none"> <li>• Mandatory remuneration of trainees</li> <li>• Mandatory access of trainees to some branches of social protection (e.g. sickness and healthcare benefits, accident insurance, maternity and paternity benefits, unemployment benefits, pensions)</li> <li>• Mandatory access to trainees to all branches of social protection</li> <li>• Forbid consecutive traineeships for the same person in the same company</li> <li>• Cap on the share of trainees relative to the number of employees</li> <li>• Cap on the maximum duration of traineeships</li> <li>• Measures to ensure learning content of traineeship (indicated in Q8)</li> <li>• Labour inspections</li> <li>• Channels for trainees, youth organisations or trade unions to report misuse of traineeships</li> <li>• Written traineeship agreement stating tasks and responsibilities and arrangements for learning, mentorship and evaluation.</li> <li>• Other (please specify)</li> </ul> <p><b>Rows</b></p> <ul style="list-style-type: none"> <li>• Completely disagree</li> <li>• Somewhat disagree</li> <li>• Neutral</li> <li>• Somewhat agree</li> <li>• Completely agree</li> <li>• Do not know</li> <li>• N.A</li> </ul>
<p>12. What other measures are in place in your country to prevent replacement of regular employment by traineeships and to what extent have they been effective? (open answer)</p>	<p>Open text answer</p>

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

Survey questions to public authorities	Answers
13. In your view, what other measures not yet in place in your country could be useful to prevent replacement of regular employment by traineeships? (open answer)	Open text answer

**Business/employer associations**

Survey questions to employer organisations	Answers
1. Respondent information. This information will only be used for the study and will not be publicly disclosed.	<ul style="list-style-type: none"> <li>• Name of organisation (open answer)</li> <li>• Type of organisation (open answer)</li> <li>• Name of respondent (open answer)</li> <li>• Role in the organisation (open answer)</li> <li>• Email (open answer)</li> <li>• I agree to be contacted by the study team for further questions (yes/no).</li> </ul>
2. In which country is your organisation based? (single choice answer)	<ul style="list-style-type: none"> <li>• List of countries</li> </ul>
3. In which sector are your members active? (single choice answer)	<ul style="list-style-type: none"> <li>• Financial &amp; insurance activities</li> <li>• Construction</li> <li>• Professional, scientific &amp; technical activities</li> <li>• Wholesale &amp; retail trade, transport, accommodation &amp; food</li> <li>• Public sector / administration</li> <li>• Information &amp; communication</li> <li>• Industry (except construction)</li> <li>• Agriculture, forestry &amp; fishing</li> <li>• Arts, entertainment &amp; recreation</li> <li>• Health &amp; social work</li> <li>• Education</li> <li>• Other (please specify)</li> </ul>
4. What are the benefits of having trainees for employers? Please rank the following benefits from most important to least important. (ranking)	<ul style="list-style-type: none"> <li>• Contribution to increased productivity of the company</li> <li>• Developing mentors' managerial skills</li> <li>• Lower costs of labour for entry level tasks</li> <li>• Lower cost for future recruitment of trained workers</li> <li>• Better performance of subsequently-retained trainees compared to new hires for the same role</li> <li>• Innovation in methods or tools brought by the trainees</li> <li>• Improved reputation and attractiveness of the company</li> <li>• Other (please specify)</li> </ul>
5. What activities have been implemented in your country to raise awareness of employers, including SMEs, on the QFT and any national measures on the quality of traineeships? (multiple choice answer)	<ul style="list-style-type: none"> <li>• Publications on public authority website</li> <li>• Outreach/communication of national authorities to employer organisations and trade unions</li> <li>• Outreach/communication of employer organisations to businesses</li> <li>• Public information campaign</li> <li>• Workshops and events</li> <li>• Other (please specify)</li> <li>• Do not know/N.A</li> </ul>
6. To what extent have the activities implemented (selected in the previous question) been effective in raising awareness of employers? (single choice answer)	<ul style="list-style-type: none"> <li>• To a great extent</li> <li>• To a moderate extent</li> <li>• To a small extent</li> <li>• To no extent</li> <li>• Do not know</li> <li>• N.A</li> </ul>
7. Please specify why they have been effective or not to raise awareness. (open answer)	<ul style="list-style-type: none"> <li>• Open text answer</li> </ul>
8. Are there data collected on the number of traineeships in your country? (matrix question, single choice answers)	<p><b>Columns</b></p> <ul style="list-style-type: none"> <li>• Open market traineeships (non-mandatory traineeships based on bilateral and private agreements between a trainee and a traineeship provider)</li> </ul>

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

Survey questions to employer organisations	Answers
	<ul style="list-style-type: none"> <li>ALMP traineeships (offered to unemployed people to support the transition to the labour market, with the public employment service acting as intermediary)</li> <li>Student traineeships that are formal part of curriculum</li> <li>Traineeships that are mandatory to access specific professions (e.g. lawyers, doctors)</li> </ul> <p><b>Rows</b></p> <ul style="list-style-type: none"> <li>Yes (please specify by whom and add link)</li> <li>No</li> <li>Do not know</li> <li>N.A</li> </ul>
<p>9. Are there any measure implemented in your country by business/employer organisations to improve the accessibility of traineeships to vulnerable groups (e.g. persons with disabilities, from minorities or low economic background)? (single choice answer)</p>	<ul style="list-style-type: none"> <li>Yes (please specify)</li> <li>No</li> <li>Do not know/N.A</li> </ul>
<p>10. (If the answer to Q9 is 'yes') To what extent have these measures increased the accessibility and take up of traineeships by vulnerable groups? (matrix question, single choice answers)</p>	<p><b>Columns</b></p> <ul style="list-style-type: none"> <li>Persons with disabilities</li> <li>Persons with low socio-economic background</li> <li>Persons from (ethnic, religious, sexual) minorities</li> </ul> <p><b>Rows</b></p> <ul style="list-style-type: none"> <li>To a great extent</li> <li>To a moderate extent</li> <li>To a small extent</li> <li>To no extent</li> <li>Do not know</li> <li>N.A</li> </ul>
<p>11. Are there any measure implemented by business/employer organisations in your country to ensure that traineeships are a learning experience for trainees? (single choice answer)</p>	<ul style="list-style-type: none"> <li>Yes (please specify which measures)</li> <li>No</li> <li>Do not know/N.A</li> </ul>
<p>12. (If the answer in Q11 is 'yes') To what extent do these measures ensure that trainees acquire the skills needed by the companies? (single choice answer)</p>	<ul style="list-style-type: none"> <li>To a great extent</li> <li>To a moderate extent</li> <li>To a small extent</li> <li>To no extent</li> <li>Do not know</li> <li>N.A</li> </ul>
<p>13. How are the QFT principles and national measures on quality of traineeships enforced in your country? (multiple choice answer)</p>	<ul style="list-style-type: none"> <li>Based on inspections (please specify from whom)</li> <li>Based on complaints received (please specify from whom and whether there are systems in place for trainees, youth organisations or trade unions to report issues with traineeships)</li> <li>Other (please specify)</li> <li>Do not know</li> <li>N.A</li> </ul>
<p>14. To what extent do you believe that the replacement of regular employment by traineeships is common in your country? (single choice answer)</p>	<ul style="list-style-type: none"> <li>Very common</li> <li>Somewhat common</li> <li>Not common</li> <li>Do not know/N.A</li> </ul>
<p>15. If any of these measures are already in place in your country, to what extent do you agree/disagree with the following statement: 'These measures reduce the risk that traineeships replace</p>	<p><b>Columns</b></p> <ul style="list-style-type: none"> <li>Mandatory remuneration of trainees</li> <li>Mandatory access of trainees to some branches of social protection (e.g. sickness and healthcare benefits, accident insurance, maternity and paternity benefits, unemployment benefits, pensions)</li> <li>Mandatory access to trainees to all branches of social protection</li> </ul>

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

Survey questions to employer organisations	Answers
<p><b>regular employment' (for measures not in place in your country, indicate N.A) (matrix question, single choice answers)</b></p>	<ul style="list-style-type: none"> <li>• Forbidden consecutive traineeships for the same person in the same company</li> <li>• Cap on the share of trainees relative to the number of employees</li> <li>• Cap on the maximum duration of traineeships</li> <li>• Measures to ensure learning content of traineeship (indicated in Q8)</li> <li>• Labour inspections</li> <li>• Channels for trainees, youth organisations or trade unions to report misuse of traineeships</li> <li>• Written traineeship agreement stating tasks and responsibilities and arrangements for learning, mentorship and evaluation.</li> <li>• Other (please specify)</li> </ul> <p><b>Rows</b></p> <ul style="list-style-type: none"> <li>• Completely disagree</li> <li>• Somewhat disagree</li> <li>• Neutral</li> <li>• Somewhat agree</li> <li>• Completely agree</li> <li>• Do not know</li> <li>• N.A</li> </ul>
<p><b>16. What other measures are in place in your country to prevent replacement of regular employment by traineeships and to what extent have they been effective? (open answer)</b></p>	<p>Open text answer</p>
<p><b>17. In your view, what other measures not yet in place in your country could be useful to prevent replacement of regular employment by traineeships? (open answer)</b></p>	<p>Open text answer</p>

**Trade unions**

Survey questions to trade unions	Answers
<p><b>1. Respondent information. This information will only be used for the study and will not be publicly disclosed.</b></p>	<ul style="list-style-type: none"> <li>• Name of organisation (open answer)</li> <li>• Name of respondent (open answer)</li> <li>• Role in the organisation (open answer)</li> <li>• Email (open answer)</li> <li>• I agree to be contacted by the study team for further questions (yes/no).</li> </ul>
<p><b>2. In which country is your organisation based? (single choice answer)</b></p>	<ul style="list-style-type: none"> <li>• List of countries</li> </ul>
<p><b>3. What activities have been implemented in your country to raise awareness of employers, including SMEs, on the QFT and any national measures on the quality of traineeships? (multiple choice answer)</b></p>	<ul style="list-style-type: none"> <li>• Publications on public authority website</li> <li>• Outreach/communication of national authorities to business associations and trade unions</li> <li>• Outreach/communication of employer organisations to businesses</li> <li>• Public information campaign</li> <li>• Workshops and events</li> <li>• Other (please specify)</li> <li>• Do not know/N.A</li> </ul>
<p><b>4. Are there any measure implemented in your country to improve the accessibility of traineeships to vulnerable groups (e.g. persons with disabilities, from minorities or low economic background)? (single choice answer)</b></p>	<ul style="list-style-type: none"> <li>• Yes (please specify)</li> <li>• No</li> <li>• Do not know/N.A</li> </ul>

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

Survey questions to trade unions	Answers
<p>5. (if the answer to Q4 is 'yes') To what extent have these measures increased the accessibility and take up of traineeships by vulnerable groups? (matrix question, single choice answers)</p>	<p><b>Columns</b></p> <ul style="list-style-type: none"> <li>• Persons with disabilities</li> <li>• Persons with low socio-economic background</li> <li>• Persons from (ethnic, religious, sexual) minorities</li> </ul> <p><b>Rows</b></p> <ul style="list-style-type: none"> <li>• To a great extent</li> <li>• To a moderate extent</li> <li>• To a small extent</li> <li>• To no extent</li> <li>• Do not know</li> <li>• N.A</li> </ul>
<p>6. Are there any measure implemented in your country to ensure that traineeships are a learning experience for trainees? (single choice answer)</p>	<ul style="list-style-type: none"> <li>• Yes (please specify which measures)</li> <li>• No</li> <li>• Do not know/N.A</li> </ul>
<p>7. (if the answer to Q6 is 'yes') To what extent do these measures ensure that trainees acquire skills that facilitate their entry into the labour market? (single choice answer)</p>	<ul style="list-style-type: none"> <li>• To a great extent</li> <li>• To a moderate extent</li> <li>• To a small extent</li> <li>• To no extent</li> <li>• Do not know</li> <li>• N.A</li> </ul>
<p>8. How are the QFT principles and national measures on quality of traineeships enforced in your country? (multiple choice answer)</p>	<ul style="list-style-type: none"> <li>• Based on inspections (please specify from whom)</li> <li>• Based on complaints received (please specify from whom and whether there are systems in place for trainees, youth organisations or trade unions to report issues with traineeships)</li> <li>• Other (please specify)</li> <li>• Do not know</li> <li>• N.A</li> </ul>
<p>9. To what extent do you believe that the replacement of regular employment by traineeships is common in your country? (single choice answer)</p>	<ul style="list-style-type: none"> <li>• Very common</li> <li>• Somewhat common</li> <li>• Not common</li> <li>• Do not know/N.A</li> </ul>
<p>10. If any of these measures are already in place in your country, to what extent do you agree/disagree with the following statement: 'These measures reduce the risk that traineeships replace regular employment' (for measures not in place in your country, indicate N.A) (matrix question, single choice answers)</p>	<p><b>Columns</b></p> <ul style="list-style-type: none"> <li>• Mandatory remuneration of trainees</li> <li>• Mandatory access of trainees to some branches of social protection (e.g. sickness and healthcare benefits, accident insurance, maternity and paternity benefits, unemployment benefits, pensions)</li> <li>• Mandatory access to trainees to all branches of social protection</li> <li>• Forbidden consecutive traineeships for the same person in the same company</li> <li>• Cap on the share of trainees relative to the number of employees</li> <li>• Cap on the maximum duration of traineeships</li> <li>• Measures to ensure learning content of traineeship (indicated in Q6)</li> <li>• Labour inspections</li> <li>• Channels for trainees, youth organisations or trade unions to report misuse of traineeships</li> <li>• Written traineeship agreement stating tasks and responsibilities and arrangements for learning, mentorship and evaluation.</li> <li>• Other (please specify)</li> </ul> <p><b>Rows</b></p> <ul style="list-style-type: none"> <li>• Completely disagree</li> <li>• Somewhat disagree</li> <li>• Neutral</li> <li>• Somewhat agree</li> <li>• Completely agree</li> <li>• Do not know</li> <li>• N.A</li> </ul>



**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

Survey questions to trade unions	Answers
11. What other measures are in place in your country to prevent replacement of regular employment by traineeships and to what extent have they been effective? (open answer)	Open text answer
12. In your view, what other measures not yet in place in your country could be useful to prevent replacement of regular employment by traineeships? (open answer)	Open text answer

**Youth associations/Civil Society Organisations/ education institutions**

Survey questions to youth associations/CSO/ education institutions	Answers
1. Respondent information. This information will only be used for the study and will not be publicly disclosed.	<ul style="list-style-type: none"> <li>Name of organisation (open answer)</li> <li>Name of respondent (open answer)</li> <li>Role in the organisation (open answer)</li> <li>Email (open answer)</li> <li>I agree to be contacted by the study team for further questions (yes/no).</li> </ul>
2. In which country is your organisation based? (single choice answer)	<ul style="list-style-type: none"> <li>List of countries</li> </ul>
3. What activities have been implemented in your country to raise awareness of employers, including SMEs, on the QFT and any national measures on the quality of traineeships? (multiple choice answer)	<ul style="list-style-type: none"> <li>Publications on public authority website</li> <li>Outreach/communication of national authorities to employer organisations and trade unions</li> <li>Outreach/communication of employer organisations to businesses</li> <li>Public information campaign</li> <li>Workshops and events</li> <li>Other (please specify)</li> <li>Do not know/N.A</li> </ul>
4. Are there any measure implemented in your country to improve the accessibility of traineeships to vulnerable groups (e.g. persons with disabilities, from minorities or low economic background)? (single choice answer)	<ul style="list-style-type: none"> <li>Yes (please specify)</li> <li>No</li> <li>Do not know/N.A</li> </ul>
5. (if the answer to Q4 is 'yes') To what extent have the measures presented in Q4 increased the accessibility and take up of traineeships by vulnerable groups? (matrix question, single choice answers)	<p><b>Columns</b></p> <ul style="list-style-type: none"> <li>Persons with disabilities</li> <li>Persons with low socio-economic background</li> <li>Persons from (ethnic, religious, sexual) minorities</li> </ul> <p><b>Rows</b></p> <ul style="list-style-type: none"> <li>To a great extent</li> <li>To a moderate extent</li> <li>To a small extent</li> <li>To no extent</li> <li>Do not know</li> <li>N.A</li> </ul>
6. Are there any measure implemented in your country to ensure that traineeships are a learning experience for trainees? (single choice answer)	<ul style="list-style-type: none"> <li>Yes (please specify which measures)</li> <li>No</li> <li>Do not know/N.A</li> </ul>
7. (if the answer to Q6 is 'yes') To what extent do these measures ensure that trainees acquire skills that facilitate	<ul style="list-style-type: none"> <li>To a great extent</li> <li>To a moderate extent</li> <li>To a small extent</li> </ul>

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

Survey questions to youth associations/CSO/ education institutions	Answers
<p><b>their entry into the labour market? (single choice answer)</b></p>	<ul style="list-style-type: none"> <li>To no extent</li> <li>Do not know</li> <li>N.A</li> </ul>
<p><b>8. What existing measures are effective to increase the take-up of cross-border traineeships? (multiple choice answers)</b></p>	<ul style="list-style-type: none"> <li>Publishing the vacancy on a European job portal (e.g. Eures)</li> <li>Publishing the vacancy on universities networks</li> <li>Using Erasmus + grants</li> <li>Other (please specify)</li> <li>Do not know/N.A</li> </ul>
<p><b>9. How are the QFT principles and national measures on quality of traineeships enforced in your country? (multiple choice answer)</b></p>	<ul style="list-style-type: none"> <li>Based on inspections (please specify from whom)</li> <li>Based on complaints received (please specify from whom and whether there are systems in place for trainees, youth organisations or trade unions to report issues with traineeships)</li> <li>Other (please specify)</li> <li>Do not know</li> <li>N.A</li> </ul>
<p><b>10. To what extent do you believe that the replacement of regular employment by traineeships is common in your country? (single choice answer)</b></p>	<ul style="list-style-type: none"> <li>Very common</li> <li>Somewhat common</li> <li>Not common</li> <li>Do not know/N.A</li> </ul>
<p><b>11. If any of these measures are already in place in your country, to what extent do you agree/disagree with the following statement: 'These measures reduce the risk that traineeships replace regular employment' (for measures not in place in your country, indicate N.A) (matrix question, single choice answers)</b></p>	<p><b>Columns</b></p> <ul style="list-style-type: none"> <li>Mandatory remuneration of trainees</li> <li>Mandatory access of trainees to some branches of social protection (e.g. sickness and healthcare benefits, accident insurance, maternity and paternity benefits, unemployment benefits, pensions)</li> <li>Mandatory access to trainees to all branches of social protection</li> <li>Forbidden consecutive traineeships for the same person in the same company</li> <li>Cap on the share of trainees relative to the number of employees</li> <li>Cap on the maximum duration of traineeships</li> <li>Measures to ensure learning content of traineeship (indicated in Q6)</li> <li>Labour inspections</li> <li>Channels for trainees, youth organisations or trade unions to report problematic use of traineeships</li> <li>Written traineeship agreement stating tasks and responsibilities and arrangements for learning, mentorship and evaluation.</li> <li>Other (please specify)</li> </ul> <p><b>Rows</b></p> <ul style="list-style-type: none"> <li>Completely disagree</li> <li>Somewhat disagree</li> <li>Neutral</li> <li>Somewhat agree</li> <li>Completely agree</li> <li>Do not know</li> <li>N.A</li> </ul>
<p><b>12. What other measures are in place in your country to prevent replacement of regular employment by traineeships and to what extent have they been effective? (open answer)</b></p>	<p>Open text answer</p>
<p><b>13. In your view, what other measures not yet in place in your country could be useful to prevent replacement of regular employment by traineeships? (open answer)</b></p>	<p>Open text answer</p>

## Annex 3.7. Legal analysis

A comprehensive mapping and legal gap analysis across MS was required to develop a sound problem definition. This analysis focused on the provisions related to the quality of traineeships and provided information for other parts of the study, namely the estimation of the prevalence/quality of traineeships and the definition of policy options and the estimation of impacts.

The legal analysis aimed at:

- Map the legal frameworks governing traineeships across EU Member States, including their legal status
- identifying whether EU and national legal frameworks and provisions are effectively and adequately protecting and addressing challenges regarding trainees' working conditions, including remuneration, their access to social protection, and quality assurance.

The existing legal literature on the topic provided a solid basis for constructing a legal mapping and gap analysis. Work by the European Centre of Expertise, the QFT evaluation and other relevant studies mapping legal provisions relating to the quality of traineeships in the EU served as a starting point for the analysis. Nevertheless, taking into consideration the complexity of mapping legal provisions covering all EU member states, the analysis of the existing literature was combined with additional research by a team of legal experts. The table below lists the main sources (the list is not exhaustive) used for the country fiches.

**Table 58: Studies mapping or assessing national frameworks for traineeships**

Entity	Title	Scope	Coverage
European Commission (2023)	Commission SWD. Evaluation of the Council Recommendation on a QFT	Evaluation of the 2014 QFT.	Type of traineeship: OMT, ALMP Country: EU 27
Ecorys (2022)	Study supporting the evaluation of the QFT for traineeships	Mapping of the legal implementation of each principle of the QFT in EU27.	Type of traineeship: Open market, ALMP Country: EU 27
European Network of PES (2021)	Remuneration of OMT in EU-27	Mapping of the legal provisions regarding the remuneration for OMT in all EU MS	Type of traineeship: Open market Country: EU 27
ILO (2021)	Internships, Employability and the Search for Decent Work Experience	Study of several aspects such as whether traineeships deliver quality training, the effects on employability, and assessment of regulations in selected countries.	<i>Type of traineeship:</i> Open Market, ALMP, Apprenticeships, Curricular <i>Country:</i> Selected EU MS
Sprint Project (2018).	General report on internships legislation in Member States of European Union	Mapping of student placements legislations in Member States. 18 elements have been analysed to characterise national legislations, including the definition, the accessibility, protection for civil liability or accident	Type of traineeship: Focus on traineeships in (higher) education but the scope could be broader for certain MS and include vocational training or apprenticeship. <i>Country:</i> EU 27 + Switzerland

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN  
RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

European Commission (2018)	Traineeships under the Youth Guarantee. Experience from the ground	Report on good practices on how different types of traineeships can comply with the QFT principles in each EU MS.	<i>Type of traineeship:</i> Open Market, ALMP,
Eurofound (2017)	Fraudulent contracting of work: abusing traineeship status (Austria, Finland, Spain, and UK)	Studying the fraudulent use of traineeships and provide practices to combat them in Austria, Finland, and Spain.	<i>Type of traineeship:</i> Traineeships outside education (ALMP OMT) <i>Country:</i> AT, ES, FI, UK
European Commission (2016).	Applying the Quality Framework for Traineeships	The study maps out in how far different types of traineeships comply with the QFT principles in each EU member state.	<i>Type of traineeship:</i> Open market, ALMP <i>Country:</i> EU 27
European Commission (2018)	Commission SWD. Impact Assessment Accompanying the document Proposal for a Council recommendation on access to social protection for workers and the self-employed	The impact assessment contains information on lack of formal coverage to social security for people in non-standard employment, including trainees.	<i>Type of traineeship:</i> all <i>Country:</i> EU 27 + UK
European Commission (2013)	Commission SWD. Impact Assessment accompanying the document Proposal for a Council Recommendation on a QFT	The Impact Assessment aiming at identifying the policy option that can increase the share of quality traineeships and help discourage substandard traineeships.	<i>Type of traineeship:</i> OMT and transnational traineeships
European Commission (2012)	Study on a comprehensive overview of traineeship arrangements in MS Final Synthesis Report	Overview of traineeship arrangements.	<i>Type of traineeship:</i> OMT, ALMP, Apprenticeships, Curricular, Transnational <i>Country:</i> EU-27 + UK

The template for the basis of this assessment is provided below:

**Country name**

**General introduction and guidelines**

**Traineeship definition** ([Council Recommendation of 10 March 2014 on a Quality Framework for Traineeships](#)):

- 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 the transition to regular employment.

**Four types of traineeships** are relevant ([Evaluation study, 2022](#)):

1. Open market (OM) 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. The main beneficiaries of this type of traineeship are students and graduates
2. ALMP traineeships 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.
3. Student traineeships, optional or mandatory, are part of the curricula of formal education or vocational education and training (VET). They are often

concluded with the involvement of educational institutions. These traineeships do not fall within the QFT scope.

4. Mandatory traineeships required to access specific professions (e.g. doctors). This type of traineeship does not fall within the scope of the QFT.

**Apprenticeships are not part of the study's scope.** According to the [Council Recommendation on the European Framework for Quality and Effective Apprenticeships of 15 March 2018](#), apprenticeships can be defined as formal vocational education and training schemes that:

1. combine learning in education or training institutions with substantial work-based learning in companies and other workplaces,
2. lead to nationally recognised qualifications,
3. are based on an agreement defining the rights and obligations of the apprentices, the employer and where appropriate, the vocational education and training institution, and
4. the apprentice is being paid or otherwise compensated for the work-based component.

Some of these features apply to certain types of traineeships but, in general, traineeships do not satisfy all of the above characteristics and are typically of much shorter duration than apprenticeships.

The country fiche consists mostly of tables covering different aspects of interest. **For each dimension, a Y(es)/N(o) answer is (most of the time) required. This binary choice can be restrictive and the expert can add, directly in the tables, explanations, comments or references that are relevant to qualify or clarify the answer.**

Each section starts with a list of references that can be used to start filling up the tables. **This list is not exhaustive and does not include national sources.** Experts are free to use any additional sources they deem relevant (indicating their references).

**For ALMP traineeships, the expert can work considering ALMP traineeship as a broad category or alternatively, it is possible to focus on 2 or (maximum) 3 specific measures/programmes.** The latter approach is often followed in country fiches produced in the studies included in the references (e.g. Sprint Project (2018), ECE country fiches). In that case, the name of the measures/programmes can be indicated. **Unused rows (i.e. if less than 3 measures/programmes are analysed or if ALMP is analysed as a broad category) can be erased from the tables.**

**The different fields of study for mandatory traineeships can also be adjusted according to the country (erasing or adding rows if required).**

### Summary of main traineeship types

**This section should provide a quick outline (1 or 2 paragraphs) for each traineeship type, if the type exists in the country.**

### Open-market traineeships

#### ALMP traineeships

- (1):
- (2):
- (3):

**Student traineeships (in secondary and tertiary education)**

**Mandatory traineeships required to access specific professions**

- Medical professions
- Legal professions
- Accounting profession

**Legal status of trainees**

**Employee status**

		Employee Status
Open Market traineeship		Y/N/Undefined or unclear Include any explanations, precisions or references Which branch of law defines the trainees' status (e.g. labour law, education)? Is the trainees' status hybrid or undefined?
ALMP	1	
	2	
Student traineeships		
Mandatory traineeships	Medical	
	Law	
	Accountant	

**Remuneration or compensation**

		General remuneration		Compensation for the trainee (e.g. travel expenses)
		legal obligation	common practice	
Open Market traineeship		<ul style="list-style-type: none"> <li>• Y/N</li> <li>• explain when relevant (including reference to relevant legal provisions)</li> <li>• if yes, who pays?</li> <li>• Amount – please indicate relative to minimum wage or regular employees</li> </ul>	<ul style="list-style-type: none"> <li>• Y/N</li> <li>• explain when relevant (including reference to relevant legal provisions)</li> <li>• if yes, who pays?</li> <li>• Amount?</li> </ul>	<ul style="list-style-type: none"> <li>• Y/N (specify if trainee or provider)</li> <li>• explain when relevant (including reference to relevant legal provisions)</li> <li>• if yes, who pays?</li> <li>• Amount?</li> </ul>
ALMP	1			
	2			
	3			
Student traineeships				
Mandatory traineeships	Medical			
	Law			
	Accountant			

		Is there a minimum wage?	Existing collective agreements (relevant for trainees' remuneration)	Existing monetary/financial incentives for companies (e.g. lumpsum per hire, tax exemption)
Open Market traineeship		<ul style="list-style-type: none"> <li>• Y/N</li> <li>• if yes, remuneration linked to a statutory minimum wage?</li> <li>• if yes, what percentage is it?</li> </ul>	<ul style="list-style-type: none"> <li>• Y/N</li> </ul>	<ul style="list-style-type: none"> <li>• Y/N</li> </ul>
ALMP	1			

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

	2			
	3			
Student traineeships				
Mandatory traineeships	Medical			
	Law			
	Accountant			

**Social protection**

The five branches included in the next three tables were selected based on the [SWD \(2018\) 71 final](#). Only invalidity was left out given that no lack of coverage was reported for trainees (see Table A.2 in Annex 6).

In practice, information on contributions for each branch could be difficult to obtain. The expert should indicate in the table if he/she was not able to find legal/regulatory information.

		Accident and occupational injuries		Sickness and healthcare	
		contribution	access	contribution	access
Open Market traineeship		<ul style="list-style-type: none"> <li>E/T/B/O</li> <li>if O, please specify</li> <li>explain when relevant (including reference to relevant legal provisions)</li> </ul>	<ul style="list-style-type: none"> <li>Y/N</li> <li>explain when relevant (including reference to relevant legal provisions)</li> </ul>	<ul style="list-style-type: none"> <li>E/T/B/O</li> <li>if O, please specify</li> <li>explain when relevant (including reference to relevant legal provisions)</li> </ul>	<ul style="list-style-type: none"> <li>Y/N</li> <li>explain when relevant (including reference to relevant legal provisions)</li> </ul>
ALMP	1				
	2				
	3				
Student traineeships					



**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

Mandatory traineeships	Medical				
	Law				
	Accountant				

Note: Contribution stands for which actor(s) pay social security contribution, either E/T/B/O (Employer, Trainee, Both or Other where other could stand for the state, region, or any institutions).

		unemployment benefits		old-age benefits	
		contribution	access	contribution	access
Open Market traineeship		<ul style="list-style-type: none"> <li>E/T/B/O</li> <li>if O, please specify</li> <li>explain when relevant (including reference to relevant legal provisions)</li> </ul>	<ul style="list-style-type: none"> <li>Y/N</li> <li>explain when relevant (including reference to relevant legal provisions)</li> </ul>	<ul style="list-style-type: none"> <li>E/T/B/O</li> <li>if O, please specify</li> <li>explain when relevant (including reference to relevant legal provisions)</li> </ul>	<ul style="list-style-type: none"> <li>Y/N</li> <li>explain when relevant (including reference to relevant legal provisions)</li> </ul>
ALMP	1				
	2				
	3				
Student traineeships					
Mandatory traineeships	Medical				
	Law				
	Accountant				

Note: In the case of old-age benefits, 'access' should be understood as the traineeships contributing to the accumulation of pension rights.

		maternity and equivalent paternity benefits	
		contribution	access

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

Open Market traineeship		<ul style="list-style-type: none"> <li>E/T/B/O</li> <li>if O, please specify</li> <li>explain when relevant (including reference to relevant legal provisions)</li> </ul>	<ul style="list-style-type: none"> <li>Y/N</li> <li>explain when relevant (including reference to relevant legal provisions)</li> </ul>
ALMP	1		
	2		
	3		
Student traineeships			
Mandatory traineeships	Medical		
	Law		
	Accountant		

**Other measures**

It is unclear whether countries would have any regulations on these aspects. Hence, this table should only be filled if relevant to do so. Experts are free to include any other measures that would not be included in the table.

		Restrictions on consecutive traineeships	Cap on the share of trainees	Teleworking arrangements (new ways of working)
Open Market traineeship		<ul style="list-style-type: none"> <li>Y/N</li> <li>explain when relevant (including reference to relevant legal provisions and what they entail)</li> </ul>	<ul style="list-style-type: none"> <li>Y/N</li> <li>explain when relevant (including reference to relevant legal provisions)</li> </ul>	<ul style="list-style-type: none"> <li>Y/N</li> <li>explain when relevant (including reference to relevant legal provisions)</li> </ul>
ALMP	1			

		Restrictions on consecutive traineeships	Cap on the share of trainees	Teleworking arrangements (new ways of working)
	2			
	3			
Student traineeships				
Mandatory traineeships	Medical			
	Law			
	Accountant			

**Transnational/cross-border traineeships**

**Geographical scope:** EU countries

**Points to consider:**

- Are there differences in the status of foreign (EU national) and national trainees in the country (Y/N and if Y, some details on which differences (e.g. in terms of remuneration/compensation, social protection) if possible)
- Any specific considerations regarding national trainees undertaking their traineeships in a foreign Member States (type of traineeship?, scholarship?, remuneration/compensation, social security contribution, other?)

**Legal framework governing quality**

**Quality assurance of traineeships**

With regards to quality aspects of traineeships, the analysis should inform on whether legal provisions exist in relation to some of the key principles of the 2014 QFT (indicated in the columns header of the different tables). For instance, should a written agreement be produced

before the start of the traineeships, are there provisions to ensure the learning content of the traineeships, or to ensure that the trainee gets a supervisor or a mentor assigned.

For OM and ALMP traineeships, the tables, for the most part, reproduce results from Tables 8 and 9 of the Evaluation study (2022). The only new information concerns the difference between mentor and supervisor where a mentor is understood as ‘a person who gives a younger or less experienced person help and advice over a period of time, especially at work or school’. There is not necessarily a hierarchical link between the mentor and the mentee, and the contents of such mentoring can go beyond the actual tasks of the trainee.

		written agreement			
		Mandatory	written agreement indicates educational objectives, working conditions, ...	written agreement indicates allowance or compensation, and amount.	written agreement indicates how the trainee/traineeship provider can terminate the traineeship
Open Market traineeship		<ul style="list-style-type: none"> <li>• Y/N</li> <li>• explain when relevant (including reference to relevant legal provisions)</li> </ul>	<ul style="list-style-type: none"> <li>• Y/N</li> <li>• explain when relevant (including reference to relevant legal provisions)</li> </ul>	<ul style="list-style-type: none"> <li>• Y/N</li> <li>• explain when relevant (including reference to relevant legal provisions)</li> </ul>	<ul style="list-style-type: none"> <li>• Y/N</li> <li>• explain when relevant (including reference to relevant legal provisions)</li> </ul>
ALMP	1				
	2				
	3				
Student traineeships					
Mandatory traineeships	Medical				
	Law				
	Accountant				
		Learning and training			
		Tasks allow the trainee to work towards their learning and training objectives	Assigned supervisor	Assigned mentor	Skills/competences recognised through assessment/certificate

**STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU**

Open Market traineeship		<ul style="list-style-type: none"> <li>• Y/N</li> <li>• explain when relevant (including reference to relevant legal provisions)</li> </ul>	<ul style="list-style-type: none"> <li>• Y/N</li> <li>• explain when relevant (including reference to relevant legal provisions)</li> </ul>	<ul style="list-style-type: none"> <li>• Y/N</li> <li>• explain when relevant (including reference to relevant legal provisions)</li> </ul>	<ul style="list-style-type: none"> <li>• Y/N</li> <li>• explain when relevant (including reference to relevant legal provisions)</li> </ul>
ALMP	1				
	2				
	3				
Student traineeships					
Mandatory traineeships	Medical				
	Law				
	Accountant				

		Working conditions		
		Trainees' rights and working conditions are respected (weekly max working time, rest periods, min holiday entitlements)	The duration of the traineeship is specified (maximum/minimum).	The conditions for termination, extension or renewal of the traineeship are clear and known by all stakeholders
Open Market traineeship		<ul style="list-style-type: none"> <li>• Y/N</li> <li>• explain when relevant (including reference to relevant legal provisions)</li> </ul>	<ul style="list-style-type: none"> <li>• Y/N</li> <li>• explain when relevant (including reference to relevant legal provisions)</li> <li>• Please indicate length (in months)</li> </ul>	<ul style="list-style-type: none"> <li>• Y/N</li> <li>• explain when relevant (including reference to relevant legal provisions)</li> </ul>
ALMP	1			
	2			
	3			
Student traineeships				

STUDY EXPLORING THE CONTEXT, CHALLENGES AND POSSIBLE SOLUTIONS IN RELATION TO THE QUALITY OF TRAINEESHIPS IN THE EU

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Mandatory traineeships	Medical			
	Law			
	Accountant			

**Inclusiveness and accessibility of traineeships**

**Points to consider:**

- Are there traineeships targeted at vulnerable groups of individuals (e.g. low educated, people with disabilities)? (Y/N and if Y some details on the traineeships -e.g. type, stakeholders involved, remuneration/compensation, ...)

**Complaints and inspection**

		Procedures for registering complaints and/or channels for trainees to report malpractice	existing systems of inspections or guidance for inspectorates on traineeships
Open Market traineeship		<ul style="list-style-type: none"> <li>• Y/N</li> <li>• Examples and good practices if possible</li> <li>• Details on the process if possible</li> <li>• Add data on complaints if available</li> </ul>	<ul style="list-style-type: none"> <li>• Y/N</li> <li>• Examples and good practices if possible</li> <li>• Details about the system, e.g. if done within the regular labour law inspections or if there are any special procedures</li> </ul>
ALMP	1		
	2		
	3		
Student traineeships			
Mandatory traineeships	Medical		
	Law		
	Accountant		

**Outlook and policy developments**

This section is optional and should be filled only if some (political) developments linked to subjects addressed in this fiche are expected. It should be left blank otherwise.

**Annex 3.8. Vacancy analysis**

To assess the extent to which experience is a requirement for traineeship applications, we use the EURES platform as our main source of information. We extract and analyse data on EURES vacancies.

Among the different types of vacancies listed below, we focus on those classified as Internships, as being the closest to the concept of traineeship.

**Table 59: Overview EURES vacancies by type, on 30/10/2023**

Type	Definition	Total Vacancies (30/10)
Apprenticeship	Combines job training with academic education	13 916
Contract	Contract hire	43 446
Contract to hire	Position starting as a contract job, with the option of a permanent job	209 040
Direct hire	Hired directly by the employer, without any external staffing	1 758 870
Internship	Work experience offered by an organization for a limited period of time	1 180
On call	Position on an "as needed" basis	12 652
Recruitment reserve	Candidate is on the waiting list for the job vacancy	24 089
Seasonal	Temporary and short-term job	28 519
Self-employed	Person pursuing a gainful activity for their own account, under cond. Laid down by national law	41 437
Temporary	Position only for a certain period	339 585
Temporary to hire	Position starting as a temporary job, with the option of a permanent job	181 257
Volunteer	Volunteer work	953
Not Specified		275 133

EURES offers a classification of vacancies according to whether 'experience' is explicitly included in the vacancy and, when it is the case, whether it is required or not and its level. From the internship vacancies, we attempt to extract information on experience: i) whether the experience is explicitly included in the vacancies, and if it is, ii) whether this is a requirement to apply for the position (and, hence, potentially to access the traineeship).



## Annex 4. Conclusions of the evaluation and link to the study

**Table 59: How the study addresses the evaluation conclusions**

Main evaluation conclusions	Study
<p>Relevance: the QFT is highly relevant to fostering the labour market integration of young people. A lesson from the pandemic is that adjustment may be needed to make sure the QFT remains relevant in a context of more remote work. Mixed views on the relevance of the non-binding nature of the QFT and on the relevance to add remuneration and social protection in the QFT principles.</p>	<p>Policy measures on fair remuneration and access to social protection are proposed, as well as measures to facilitate remote/hybrid traineeships and promote their quality.</p>
<p>Effectiveness: The principles of the QFT have been enshrined to a moderate degree in national legislation/frameworks for traineeships. Even when national legislation shows high implementation of the QFT, this does not always translate to quality traineeships on the ground, due to lack of enforcement and monitoring. There have been improvements in the quality of traineeships since 2014 but inequalities remain in terms of access to opportunities to undertake traineeships.</p>	<p>Policy measures to improve working conditions and increase transparency on the learning content are proposed. Policy measures to ensure accessibility to persons with disability and the inclusiveness of traineeships to all vulnerable groups are proposed. Policy measures to determine problematic traineeships and to strengthen inspections and enforcement are proposed. Accompanying measures are proposed on awareness raising, data collection and monitoring and further stakeholder involvement.</p>
<p>Efficiency: Overall the adjustment costs for employers linked to supervising trainees, assessing and certifying trainees' skills, and developing training plans were assessed as small, likely to be more significant for small organisations. The QFT implied enforcement costs for authorities for designing and implementing new legislation and for labour inspection. Overall, costs are lower than benefits and the administrative burden is low.</p>	<p>The policy measures will be designed to minimise additional administrative costs and other costs for businesses and authorities.</p>
<p>Coherence: There is a fairly good level of coherence with the national policies especially on employment policies for ALMPs. There is good level of coherence with other relevant EU initiatives, funds and programmes.</p>	<p>The policy measures will enhance coherence by covering all four types of traineeships, all trainees and further aligning with existing national and EU initiatives.</p>
<p>EU added value: the QFT provides an EU-level structure and framework for national authorities and policymakers although the full EU added value is limited by weak implementation.</p>	<p>Policy measures are proposed to improve the implementation, monitoring and enforcement of the QFT and increase its EU added value.</p>

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