

First-phase consultation of Social Partners under Article 154 TFEU on a possible action further improving the quality of traineeships

Response of CEC European Managers

1. Do you consider that the European Commission has correctly and sufficiently identified the issues and the possible areas for EU action?

Traineeships are an important bridge between the education system and the labour market. For many young people, especially from disadvantaged backgrounds, traineeships are an opportunity to discover the world of work, gain professionalizing competences, explore different careers, and build the own career path. In the case of cross-border traineeships, they can also promote transnational innovation capacity, intercultural competences, and European integration, among others.

Adopting a lifelong learning perspective

With the growing importance of continuous up-skilling and re-skilling of the workforce for the digital and green transitions, among other changes, traineeships need however also to be integrated into a lifelong learning perspective. The evolving labour market will require adults to go back to formal education, training, as well as traineeships. To promote innovation capacity and upskilling at the intersection of workplaces, education systems and the labour market, conditions need to be created to facilitate moving from education to jobs and back. This includes social protection and fair pay, without discrimination of age.

2. Do you consider that EU action is needed to address the identified issues effectively and achieve the objectives set out?

The absence of a common normative framework for traineeships at European level creates dysfunctions and inequalities in the Member States. Council Recommendation 2014/C 88/01 of 10 March 2014 on a quality framework for traineeships laid down the first outlines of a common framework in this area.

However, shortcomings remain, and the quality of traineeships is very uneven both between Member States and from one establishment to another within the same country. Trainees do not enjoy sufficient social protection, fair pay and decent working conditions.

While traineeships can be a differentiating factor in a career path, access to internships is largely unequal and is not the subject of any specific measures at European level. Lastly, widely differing legal regimes still coexist within the Member States of the European Union.

Adopting minimum standards adapted to circumstances

Against this background, the priority of EU action on traineeships should be to promote the access to high-quality traineeships through complementary measures. Regarding the remuneration of traineeships, a minimum threshold reflected by a common reference indicator aligned to the local cost of living, as well as gradual criteria (advancement in diploma, level of education) could be identified at European level. With respect to social protection, trainees, across the career path, should have, without age discrimination, access to social protection systems.

Furthermore, traineeships should be limited in time to ensure they are not replacing employment. With the growth in hybrid working schemes, trainees' working arrangements need particular consideration. Being accompanied by a tutor / manager and integrated into an organizational culture is often more difficult in remote settings. Therefore, traineeship providers should make sure that trainees can spend most of their traineeship in onsite workplaces.

Designing action grounded in trainees' real needs

To gain a better understanding of trainees' needs in the EU, more quantitative and qualitative data is needed. The criteria set by the QFT can serve as indicators. To be effective and avoid increasing the burden on employers and trainees, adequate data collection methods should, wherever possible, integrate or complement existing national or sectoral initiatives (student's university traineeship reports, existing review platforms of internships etc.). Data collected at sectoral, regional and/or national level can then be aggregated at European level.

Harvesting digital opportunities to support learning and labour market integration

For instance, an EU-level platform (integrated to existing platforms like EURES) with reviewed traineeships could improve the transparency around offers and quality of internships, and potentially offer a platform for interns to exchange and learn from each other's experience, also from other Member States. Such a platform, which could be co-developed by youth organisations, social partners and public services, could also be linked with an EU-level funding mechanism to support trainees, particularly in the case of cross-border traineeships.

Furthermore, ways of facilitating the transition of trainees into a job could be promoted through non-legislative measures, such as coaching and mentoring, access to online education etc.. These could also be integrated into such a digital platform as a "gateway into the labour market" facilitated by the EU. Considering that Erasmus+ is the most successful, supported and trusted EU initiative, extending EU action as promoter of opportunities through (transnational) learning and exchange seems highly legitimate, particularly at a time of growing distrust towards the EU and a challenging world of work.

Lastly, trainees should have access to being represented, accompanied and protected by representatives of personnel / trade unions. In this respect, we support article 7 of the European Parliament resolution from 14 June 2023 on quality traineeships¹.

3. Would you consider initiating a dialogue under Article 155 TFEU on any of the issues identified in this consultation?

CEC European Managers is available to initiate a dialogue under Article 155 TFEU should the Commission conclude that legislative action at EU level is needed under Article 153 TFEU.

¹ https://www.europarl.europa.eu/doceo/document/TA-9-2023-0239_EN.html
Cons.Traineeship-1st phase 2023