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COMMISSION STAFF WORKING DOCUMENT
EXECUTIVE SUMMARY OF THE EVALUATION

of the Council Recommendation on a Quality Framework Traineeships

{SWD(2023) 9 final}

Introduction

This report presents the findings of the Commission's evaluation of the Council Recommendation of 10 March 2014 on a Quality Framework for Traineeships (2014/C 88/01) (hereinafter QFT). It assesses the extent to which the QFT is effective, efficient and coherent, provides EU added value and remains relevant to tackle present needs, bearing in mind that a Council Recommendation is of a non-binding nature.

The QFT aims at helping young people transition from education, unemployment or inactivity into the labour market through quality traineeships that enhance their skills, allow them to gain work experience and thereby increase their employability. It also seeks to increase the transparency of the traineeship market, to increase awareness of rights and obligations among trainees and traineeship providers, to ensure more coherent regulatory approaches across Member States and to facilitate cross-border traineeships. To achieve these objectives, the QFT sets out 21 quality principles¹ for traineeships. The QFT applies to Active Labour Market Policy (ALMP) traineeships as well as traineeships offered in the open market (OMTs). It does not cover work experience placements that are part of curricula of formal education or vocational education and training. Traineeships of which the content is regulated under national law and whose completion is a mandatory requirement to access a specific profession (medicine, architecture, etc.) are also not covered by the QFT.

Different research activities carried out as part of the study supporting the evaluation² (i.e. targeted consultations, public consultation, mapping and case studies) underpin the assessment. A key limitation of the evaluation concerns the lack of systematic data collection on traineeships, in particular on OMTs, as well as the lack of quantitative data on costs and benefits. Another challenge relates to isolating the impact of the QFT on youth employment from the impact of traineeships in general.

Key findings

While the research conducted in support of this evaluation did not allow to establish a causal relation between the QFT (a non-binding instrument), the extent of its integration in the national legislation or frameworks and the quality of traineeships, some indications of possible positive impacts of the QFT on the quality of traineeships and youth employment were found.

Traineeships continue to be an important pathway for young people to enter the labour market. Quality traineeships, which reflect the principles of the QFT, contribute to increasing young people's employability and help employers to attract, train and retain young talent. This is particularly relevant in the context of the pronounced skills mismatches and skills gaps that exist currently on the labour market.

¹ The first point in the QFT is not considered a quality principle on its own, but an overall recommendation to Member States to implement the (21) quality principles that follow thereafter

² Study supporting the evaluation of the Quality Framework for Traineeships (2023)

In terms of **effectiveness**, the QFT principles which are most likely to have a positive impact on labour market integration of young people are the definition of learning and educational objectives and the written agreement although actual progress in the take-up of its quality principles in national legislation has been moderate. Since 2014, 14 Member States introduced changes (either on OMTs or ALMP traineeships or both) integrating quality principles of the QFT in their legislative or policy frameworks. Such changes were more prevalent in national legislation governing ALMP traineeships (identified in 12 Member States), than OMTs (identified in five Member States). Furthermore, whilst the prevalence of specific legal provisions as well as their conformity with the principles of the QFT were found to be high for ALMP traineeships, they are more limited for OMTs. Overall, a slight improvement in terms of conformity can be observed for OMTs with four Member States fully/mostly aligned in 2016 versus seven Member States in 2021. A larger improvement is observed for ALMP traineeships, with 18 Member States fully/mostly in conformity in 2021 versus 15 in 2016. As regards the actual application of the QFT on the ground, as well as their monitoring and enforcement, there is in general room for improvement. As for the QFT facilitating cross-border mobility of trainees in the EU, there are indications that the number of cross-border traineeships has increased, but young people still face difficulties participating in them due to a lack of financial means and the unavailability of relevant practical information. The use of EURES as a source of information was found to be limited. The QFT provided **added value** as a reference point at EU level for Member States' regulatory action on the quality of traineeships, in particular in Member States with less developed traineeship systems, where it helped to foster policy and legislative changes at national level.

As for **efficiency**, though the evaluation lacked quantitative evidence on costs and benefits, stakeholders generally perceived the cost related to implementing the QFT as proportionate to the benefits. Benefits for employers include a better understanding of the determinants of traineeship quality, reputational advantages, an increased attractiveness to young talent, and a more affordable way to invest in potential future workers. However, the implementation of the QFT can be less cost effective for small and micro enterprises than for larger firms, as for those enterprises costs (in view of limited human and financial resources) may be higher relative to benefits. Financial incentives can help increase the benefits to traineeship providers compared to the costs involved. Benefits of the QFT for trainees include improved working conditions, as well as better training and learning content, which increase their chances of entering stable employment.

The QFT was found to be **coherent** with other EU level initiatives, strategies, programmes and funding instruments. At national and regional level, a higher level of coherence was found with measures on ALMP traineeships than with those on OMTs. Despite the many similarities in quality principles, the European framework for quality and effective apprenticeships (EFQEA)³ was perceived as leading to a greater involvement of stakeholders (e.g. through dedicated networks). The EFQEA was also viewed as having a higher and more

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

specific quality ambition as well as benefits due to stronger language used in the EFQEA recommendation and apprenticeships often being more regulated on a tripartite basis in Member States.

Though some respondents (in particular employers) considered that the QFT should remain "as is" as they deem the QFT sufficiently relevant in addressing trainees' needs, various stakeholders considered that the **relevance** of the QFT could be further strengthened, in particular when it comes to remuneration and social protection for trainees, and outreach to as well as access for vulnerable groups. In addition, some stakeholders consider there is a need for the QFT to address the challenges of the increased practice of telework as well as guidance and mentorship in that context. Furthermore, some stakeholders suggest adding traineeships that are part of formal education and training to the scope of the QFT. Also, some stakeholders consider that to ease the transition of a young trainee to a stable job, the QFT could place more emphasis on post-placement support. As for the non-binding nature of the QFT, views diverge on whether this is appropriate for fully reaching the QFT objectives with some (notably youth organisations and trade unions) arguing for a binding instrument to increase the effectiveness of the QFT, whilst others (notably employers and national authorities) arguing that given the diversity of national situations and legal limitations at the EU level, the QFT's non-binding nature offers an adequate and flexible reference framework for national regulations.

Lessons learned

Quality traineeships, in line with the principles of the QFT, increase young people's employability. The QFT principles are viewed as still relevant, but the evaluation also brought to light certain considerations to be made for reinforcing it. The collection of comparable data on the prevalence, quality and nature of traineeships across Member States needs to be significantly strengthened to identify improvements and remaining challenges and to allow for comparison across the EU. Drawing inspiration from the EFQEA, the implementation of the QFT could benefit from a stronger involvement of stakeholders (e.g. through dedicated networks) and from more emphasis on ensuring a higher degree of national legislation in line with QFT principles on OMTs. Stronger monitoring and enforcement in conjunction with an increased awareness amongst various key stakeholders could improve the implementation and effectiveness on the ground. **Employers** could be better assisted in accessing **financial support** by providing practical guidance as well as by linking such financial incentives to the application of the QFT quality principles. There is also a need to provide more concrete and practical information to young people on cross-border traineeships.

The coherence of the QFT with national policies on employment, education and training and social policies could be further improved through strengthened coordination across these policy areas. There is also a need to reflect on the scope of the QFT, in particular on extending it to traineeships which are part of curricula of formal education or vocational education and training.

It should be assessed whether the relevance of the QFT could be reinforced by adding quality elements on fair remuneration and social protection as well as provisions on telework/hybrid traineeships, by better addressing the needs of vulnerable groups, and through strengthened support to trainees during and after the traineeship (e.g. through mentorship and post-placement support).

Any revision of the scope or the content of the QFT has to duly take into account the possibilities and the limitations, including the principle of subsidiarity, of the different instruments available at EU level. In addition, changes would need to be carefully assessed in the light of potential additional benefits and costs for stakeholders, in particular for small and micro enterprises.