



Quality of Traineeships

**Eurocadres
response to the
Social Partner
Consultation**

14/09/2023

Quality Framework for Traineeships

As a recognized social partner, Eurocadres – The European Council for professionals and managers, welcomes the Commission's initiative to update the Quality Framework for Traineeships. For Professionals and Managers, the early career stages are often characterized by poor remuneration and unfair working arrangements which put especially young workers in to precarious position. The initiative should provide adequate access to social protection, decent remuneration and fair working conditions especially for these vulnerable groups.

Eurocadres is responding to the 1st phase of the Social Partner Consultation on a possible action further improving the quality of traineeships. As per Commission request, Eurocadres answers to the following questions as part of the consultation:

- (1) Do you consider that the issues and possible areas for further EU action are correctly identified in this document?
- (2) Do you consider that EU action is needed to address the identified issues? If so, what should be the direction and scope of that action?
- (3) Would you consider initiating a dialogue under Article 155 TFEU on any of the issues identified in this consultation?

(1) Do you consider that the issues and possible areas for further EU action are correctly identified in this document?

As a general direction, we welcome the action to improve the quality of traineeships and address the several shortcomings the current traineeship schemes have. The aim of the traineeships, to provide both skills and experience in the early working stages should not lead into putting junior workers into a precarious position. Traineeships must not lead into a creation of an additional “third category” of workers, which have lesser social protection and working conditions than other workers.

Due to their limited negotiation power, persons taking traineeships are often in more precarious positions and need binding protection to ensure fair compensation and working conditions among the others. As shown by the recent EU Barometer¹ currently the workers on traineeships are often in a precarious position which needs to be addressed urgently to avoid potential long term impacts on social and economical well-being.

Most importantly, traineeships that have similar work deliverables as other similar workers need to be formally recognized as employment. While there are different traineeships models in the EU Member States that need to be respected, any underlying definition of traineeship needs to have a formal understanding that traineeships contribute to the employers in a similar manner as regular workers and need to have similar basic rights. As the Directive on transparent and predictable working conditions² states, this includes an access to collective bargaining. The employment recognition is also necessary to ensure that workers contributions and rights to pension are calculated through their whole work-life when traineeships are considered regular employment (unless defined differently in collective agreement).

As noted by the Consultation paper, there is significant amount of repeated traineeships set by the same employers, which holds a high risk of using traineeships as fake traineeships. In general, the EU action needs to have a strong message that using traineeships as a model to replace regular working contracts is unacceptable.

However, without inclusions of proper information and education on the rights of the workers taking traineeships or presentation of trade unions, these are hard to enforce, further stressing the need for a strong trade union link already at the traineeship stage. As research shows, the current trends in work life, such as flexible working contracts, put traineeships even in more precarious position after the COVID-19 pandemic.³

While the QFT does not concern placements that are part of the curricula of formal education or vocational education and training, nor does it cover traineeships of which the completion is mandatory in order to access a specific profession, Eurocadres also sees that there is a need

¹ [Flash Eurobarometer 523](#)

² OJ L 186, 11.7.2019, p. 105–121.

³ [Social protection of non-standard workers and the self-employed during the pandemic, ETUI, 2021](#)

to safeguards fair traineeships also in these professions to provide rights to all traineeships that carry out working functions. While generally these mandatory traineeship and education paths have some strengths compared to others (namely their aim to support permanent employment), they may hold conditions that put the workers that are part of the traineeships into a more vulnerable position.

(2) Do you consider that EU action is needed to address the identified issues? If so, what should be the direction and scope of that action?

The clear principles of the needs of traineeships should be also binding to ensure that they respect and effectively enforce the pillar of social rights. These should cover all the regular workers rights set by existing EU legislation⁴. However, the potential Directive should focus on general provisions and the Directive should not jeopardise the possibility of social partners to negotiate sector specific collective agreements that also cover traineeships.

All these aspects need to be enforced by an effective quality criteria. This is why Eurocadres calls for a Directive to ensure all European workers are entitled to adequate traineeship conditions no matter where they are employed, and especially to ensure

This is especially necessary for Professionals and Managers, which as a category are more prone to traineeships in general.⁵ The Professionals and Managers group of workers area also mobile in the Single Market, further stressing the need for EU-wide regulatory action.

The strong cross-border aspect in the contemporary traineeship models calls for further recognition of the traineeships as regular work that requires worker protection. As ETUI's research⁶ stressed that internships may be left outside application of local labour law, especially if they do not include a proper working contract. These workers are also in more precarious position if they are dismissed (which may lead to loss of residence permit) and they do not hold the right to parallel employment as EU Directive on transparent and predictable working conditions entails. This further emphasizes a need for EU-wide, regulatory action to ensure quality traineeships across the EU.

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

Eurocadres is aligned with the ETUC position for question number 3.

⁴ E.g. Directive on adequate minimum wages in the EU, Fixed-Term Work Directive

⁵ [The quality of traineeships in the EU, 2022, EPRS](#)

⁶ [Interaction between labour law and immigration regimes, ETUI, 2023](#)