

Risposta de Lo Spazio della Politica alla consultazione europea "Quality Framework for Traineeships"

In your view is there a need for European level action regarding the quality of traineeships?

Yes, there is a strong need for a European level action on traineeships: first, there is a urgent need of issuing a regulation in almost all EU Member States. The Commission should be proactive in providing a common regulatory framework if MS are not acting on their own. Second, traineeships are a key step to enter the labour market together with apprenticeships and they can be a useful tool to promote the creation of a truly European labour market by fostering mobility and exchanges. Without a common framework, nowadays it is not easy to study in a country and do an internships in another.

What should be the scope of such an initiative?

The initiative should cover all traineeships agreed by European schools and universities both in the EU and the Member States and in other countries. The initiative should differentiate between i) short internships in high school and at the beginning of the university, ii) internships at the end of the university and iii) internships after graduation. The first should be regulated only with regards to the agreement, the objectives, the supervision and the insurance. The second should also clearly regulate the duration and the remuneration. The third should ideally be forbidden or strictly limited to the first year after graduation.

What should be the form that such an initiative at EU level should take?

The EU does not have an exclusive competence to act in the field of labour law. However, important directives about working time and arrangements have been issued in the past 15 years. Therefore, the first best would be to issue a binding initiative at least on the basics elements of a quality traineeships (agreement, duration, adequate protection and remuneration) building on the cross-party political support of the resolution 2009/2221 (INI) approved by the EP in 2010.

If a binding initiative is not legally or politically feasible, the initiative at European level can be expressed as a European Quality Charter on Traineeships as outlined here <http://qualityinternships.eu/>. The Charter should be agreed and signed by social partners.

However, all political and legal efforts should be done in order to take a binding initiative.

In your view are the elements of a high quality traineeship proposed in the attached Staff Working Document relevant?

All the elements of a high quality traineeship proposed in the Commission Staff Working Document are relevant and should form the basic content of the initiative. However, they should be stricter than those expressed in the Working Document:

- No traineeship should be possible without an agreement specifying the duration, the remuneration and the objectives. A final evaluation by the employer, the school or university and the intern should follow.
- The objectives of the traineeship should be in line with the curriculum of the intern (i.e. the intern should not be employed to do only secretarial/administrative work).
- A basic remuneration (or reimbursement) of one third of national (or sectoral) minimum wage should be compulsory for internships at the end of university and for internships longer than one month.
- Internship after graduation should be ideally forbidden or limited to one year after graduation. A minimum remuneration of 50% of national (or sectoral) minimum wage should be guaranteed.
- On duration we would suggest setting it at a maximum of 6 months. Exceptions for lawyers, teachers and medical doctors should be granted provided that a higher remuneration is ensured.

What further elements would you suggest for consideration?

We would also suggest considering the following elements:

- Interns should not exceed a given percentage of full-time employees in the team/division to which the intern is assigned (10%, 2 for firms with 10 to 19 employees, 1 for firms with less than 10 employees).
- Firms should be incentivised to hire interns either through proper fiscal incentives or by imposing delays between an internship and the following one if the previous one has not been transformed in a proper contract.
- Extensions should not be possible and in any case they should never exceed the maximum duration of an internship.

And most important: any regulation without sanctions is ineffective. The initiative should also set (or strongly encourage MS to set) sanctions: schools/universities and firms not respecting the regulation should be prevented to sign new traineeships for at least one year. Pecuniary sanctions should also be envisaged in case of serious and repeated misbehaviour. More in general, internships should be subjected to the same controls by public authorities as normal labour contracts.