

UNICE position paper on the draft decision of the Council on "Promotion of European Pathways for Work-linked Training and Apprenticeship" [COM(97) 572 final of 12 November 1997]

I. General Comments

1. UNICE has taken note of the Commission's proposal for a draft decision of the Council on "Promotion of European Pathways for Work-linked Training and Apprenticeship". Employers welcome this initiative which combines two factors of importance to companies: work-linked training and mobility.
2. European employers believe that high quality training is an essential element in improving the competitiveness of European companies. Apprenticeships can improve the relevance of training to companies and trainees alike by bringing the student into the workplace and providing practical as well as theoretical education. Apprenticeship training can thereby make a significant contribution to the "employability" of young people and help their integration into the workplace. UNICE welcomes the recognition of the workplace as an important venue for training.
3. UNICE also recognises the value of training which involves placements in other Member States. Such experience can give the trainee a different perspective on the trade of her/his choice, improve linguistic competence and provide transnational contacts. Improved trainee mobility within Europe is supported by UNICE.
4. However, UNICE attaches great importance to the statement that the European Pathways proposal "fully respects the spheres of competence of the Member States with regard to the content and organisation of their training structures". Help provided for trainees who wish to train abroad must in no way impinge on the responsibility of Member States to provide and organise training provision.
5. Of equal importance to employers is the fact that the arrangements envisaged by the proposal are voluntary in nature for all parties involved. However, once all parties involved have agreed to the transnational dimension to the individual's apprenticeship training, the period spent abroad should be an integral element in the traineeship from the conception and that it is recognised as such by the awarding authority. The proposed "Europass-training" document should only serve

as a tool to ease transparency of qualifications as a record of achievement, and must not be extended to a legally binding instrument.

6. European employers believe that the European Pathways system will only be successful if companies are fully involved. Given the work-based nature of the initiative, voluntary involvement of companies is essential if the system is to become operational. For this reason, it is important that serious consideration is given to the needs and concerns of the companies, and in particular small and medium sized companies, in the process.
7. For the concept to be of genuine interest to companies, the scheme must be flexible, unbureaucratic and quickly operational. It is also important that an effective information strategy be developed to ensure that companies and trainees alike are aware of the scheme and what it entails.
8. UNICE welcomes the proposal's recognition of the importance of equal opportunities in apprenticeship training: trainees and mentors alike should be encouraged to regard work-place training as a positive option for both men and women. In particular, UNICE strongly supports measures which encourage young women to train in growth sectors as a means to improving female participation in the workforce.
9. The draft Council decision does not establish an evaluation mechanism for the European pathways initiative. UNICE believes that the Commission should submit an evaluation report to the Advisory Committee on Vocational Training in due time after application of the Council Decision.

II Detailed comments

Article 1

10. UNICE fully supports the Decision's respect for Member States' responsibility and that it excludes any endeavour to harmonise laws and regulations in Member States. This can only be done in a bilateral framework and on the basis of voluntary participation by the parties concerned.

Article 3

11. Employers believe that the length of the training period spent abroad is an important factor. However, they stress the need to maintain some flexibility in order to make allowance for levels of training and specialisation.
12. To ensure that the record of achievement is meaningful, the training period must be defined and signed jointly by the original training provider and by the "host partner" in advance and deemed necessary for achieving the training objectives in view.

Article 4

13. UNICE considers that the Commission wrongly emphasises the qualification of the teaching mentor. In the employers' view, effective tutors in the workplace have often developed workplace skills beyond their formal qualifications, particularly those obtained in initial training. This experience developed through life long learning should not be undervalued by the European Pathways scheme.
14. The Commission proposes that the provisions of "Europass-training" also apply when the "European pathway" includes a series of training periods in several Member States. UNICE believes that the accumulation of several European training periods must not lead to an obligation of formal recognition of a full qualification in the member states of origin.

Article 5

15. Employers welcome the Commission's intention to engender consistency and complementarity with other related programmes. Amongst other things, it is important for the selection criteria decided upon in the framework of Community programmes and initiatives in the area of education and vocational training to take into account the objectives of the practical arrangements for the "European pathways".

Article 6

16. UNICE would like to underline that the European Pathways scheme should be administratively unburdensome. Since the structures put in place will have an influence on companies' decisions to participate, it is important that the national organisations designated to co-ordinate and implement the activities should be unbureaucratic.
17. Employers support the proposal that the social partners be continuously involved in the future in the implementation of the proposal at the national level. The ways and the level at which the social partners are involved should be decided within Member States according to traditions and practices at the appropriate level.

Article 7

18. European Pathways must not impose any obligatory financial burden on industry or companies, which would cause additional wage costs and interfere with competitiveness. Organisational and financial participation of companies can only take place on a voluntary basis.

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