

High Quality **or** Unpaid and Unregulated?

Uncovering National Internship
Policies in Europe



UNPAID

LOW-QUALITY

NO PROSPECTS

UN-EDUCATIONAL

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Summary

Internships have become an unavoidable rite of passage for many young people looking to start their careers, with surveys indicating about half of all young people in the EU have completed one¹. However, they have become notorious for exploiting young people through low or unpaid positions that provide no learning content and no prospects of a permanent job at the end, despite the 'opportunities' that employers promise they may provide.

Despite their prevalence, there is little information on how internships are regulated across Europe. To address this, the European Youth Forum mapped out the national internship policies of a selection of European countries, with seven detailed country profiles presented in this report (France, Romania, Croatia, Bulgaria, Austria, Ireland and Germany). The profiles are also ranked from best to worst, highlighting how different countries protect interns or leave them exposed to exploitation.

France and Romania, which are ranked highest in our report, have robust legal frameworks for internships that eliminate loopholes and entitle interns to protections, labour rights, training

1. 46% of young people surveyed in 2013 reported having completed an internship - [Eurobarometer 378](#)

and importantly ensure a minimum level of remuneration.

However, many states do not have a dedicated legal framework for internships and they are often seen as a grey area under the law, open to abuses and exploitation. In countries such as Austria, the provision of remuneration, basic labour rights and social protection are largely subject to employers' discretion because of loopholes in the law. In others, such as Germany, unpaid internships outside of education have even been classed as a legal practice, giving a greenlight for employers to exploit young people as unpaid workers with no guarantee of quality training.

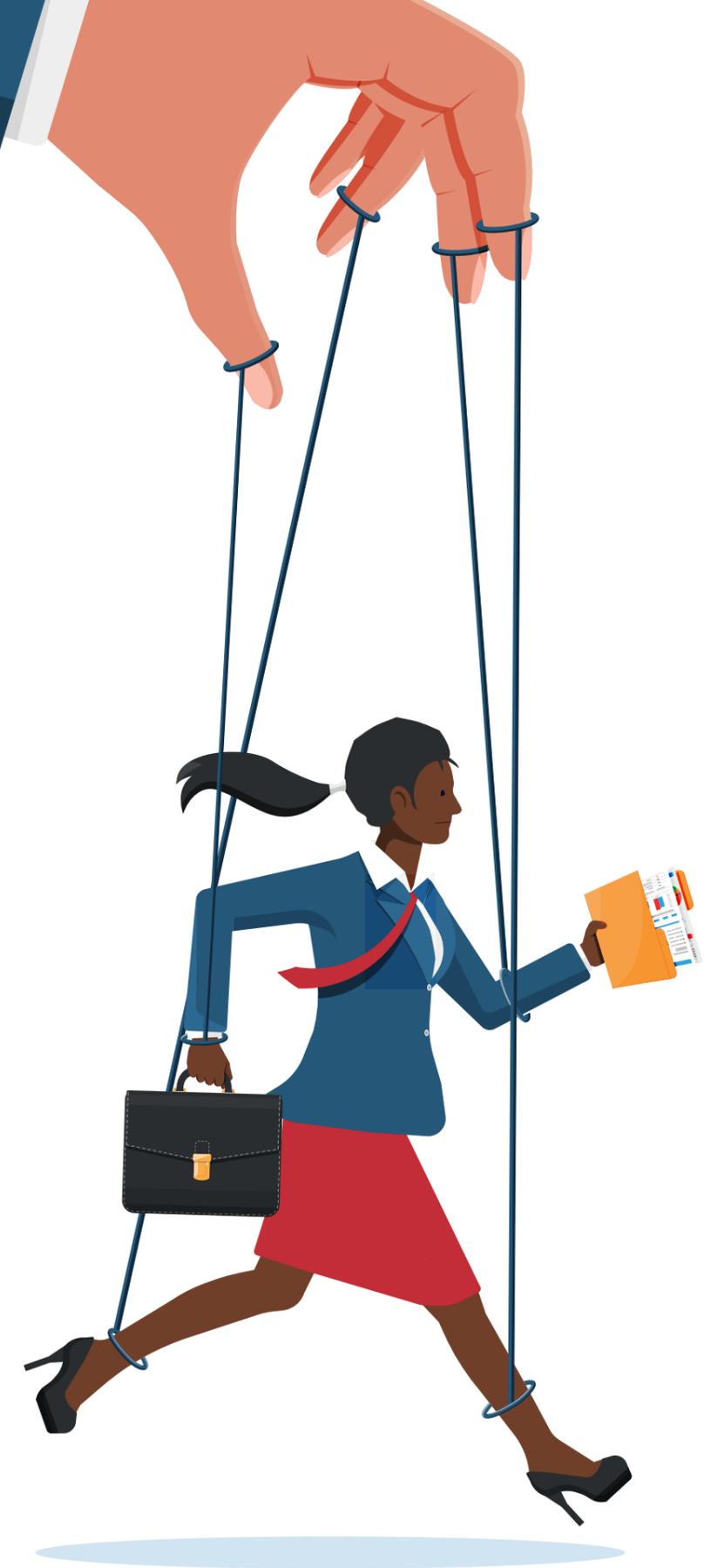
Many young people are therefore left unprotected by national policies, treated unequally as opportunities are limited to those who can afford to work unpaid, and exposed to the risk of low quality internships which often replace real jobs.

To address this, we call on governments to implement the best practice highlighted in this report. This means ensuring that all interns outside of education are clearly recognised as employees who are entitled to labour rights such as the minimum wage

and access to social protection, and introducing measures to guarantee the quality of training for all internships.

The shortcomings of internship policies across a number of EU Member States also highlights the limitations of the EU's Quality Framework for Traineeships. For the Framework to be truly effective, it must be updated to include a binding requirement for all open labour market internships (where they exist) to guarantee full employment rights along the lines of the best practice presented in this report.

Young people across the EU want decent jobs that will jumpstart their future. Strong internship policies that ensure protection and quality, and their effective implementation, are essential for making this happen through a successful school to work transition and the promotion of equal opportunities for all young people.



Introduction

Internships are often targeted at young people to provide them with a temporary experience in the workplace where they may perform work and develop their skills. They can take place in the framework of formal education, but also outside of education on the open labour market or organised by public employment services as part of active labour market policies (ALMP). For many young people they are an unavoidable part of their journey to finding a permanent job, with employers often expecting young people to have already completed one or multiple internships.

Yet, internships are frequently criticised for their low quality, failing to uphold basic labour rights or to provide any meaningful learning content. As youth organisations have highlighted in our report, these low quality internships are unfortunately common practice in many countries in Europe.

The existence of unpaid internships after education can have serious consequences on individual young people and on the rest of society. They restrict opportunities to a select number of young people whose families can afford to support them through a period of unpaid work, which entrenches inequality. They can also

lead to a reduction in good quality entry-level positions, which employers can substitute with unpaid internships to save on costs. So, instead of providing a bridge to a job, internships can actually lead to the disappearance of the very jobs young people are hoping to secure.

For the individual young person, working for free not only means being denied the recognition they deserve for their efforts, but also a lack of access to basic rights such as paid sick leave, health insurance and unemployment benefits. This can place them in an extremely precarious position with very little financial security, which, in turn, can have an impact both on their wellbeing, and on the extent to which they can actively contribute to society.

We believe that all internships outside of education must be remunerated in line with minimum wage laws or collective agreements, recognising that interns perform work that entitles them to be treated on an equal basis as other workers. Internships undertaken as part of formal education by students should also provide compensation, in order to cover living costs and the costs incurred as part of the internship (such as travel) in order to ensure that they are accessible for all young people.

However, this compensation shouldn't be considered as a salary, given that an internship during education should have a focus on learning (with regulations guaranteeing the quality of this learning) to complement their studies with workplace knowledge, rather than performing work normally undertaken by employees. In France for example the law states that student interns are not allowed to perform work normally carried out by employees and they are entitled to compensation that is calculated as a percentage of social welfare which is expressly not considered a salary.

As part of our efforts to promote better quality internships, we have mapped out national internship policies across a number of European countries in this report. We focus in particular on seven countries which demonstrate some of the best and worst internship policies in Europe: France, Romania, Croatia, Bulgaria, Austria, Ireland and Germany.

We rank each country's policy framework according to a number of quality criteria (principally the legal status of internships, remuneration, and learning content). We also uncover the legal loopholes and policy failures that allow for low quality and unpaid internships to take place,

whilst highlighting the examples of best practice which uphold young people's access to quality training and employment rights during their internships.

By highlighting the shortcomings in internship policies we hope to promote progress towards our vision of what quality internships should be, as set out in our Quality Charter for Internships and Apprenticeships².

For the individual young person, working for free not only means being denied the recognition they deserve for their efforts, but also a lack of access to basic rights such as paid sick leave, health insurance and unemployment benefits

2. European Youth Forum Quality Charter for Internships and Apprenticeships (2011)

Methodology

To map and rank different national internship policy frameworks in Europe, we undertook a process of defining quality criteria, collecting information on those criteria from existing research and youth organisations before selecting the best and worst practice to be presented in this report. Each country is ranked according to how well they match with our quality criteria.

For the definition of quality criteria for national internship policies we relied on the provisions outlined in our European Quality Charter for Internships and Apprenticeships and tailored them to allow for a ranking of national policies:

- **Legal status of interns:** A lack of legislation or insufficient enforcement of legislation on the quality of education and post-education internships represents worst practice, whereas the clear definition of internships in legislation and the enforcement of these laws represents best practice. Another element of best practice can be the restriction of internships to only take place in education to prevent the replacement of standard jobs with internships.

- **Remuneration:** Worst practice is reflected in policies that make unpaid internships post-education legal, and where unpaid internships are a common occurrence. The minimum level of remuneration an intern can receive is another quality consideration, with access to at least the minimum wage (which should be above the poverty threshold of 60% of median income) representing best practice in post-education internships, and the provision of a stipend or other compensation best practice for education internships.

- **Learning content:** Measures to ensure the quality of learning can include the obligation to develop a learning plan that sets out the skills the young person should gain, the assignment of a mentor, the provision of regular feedback and a certificate at the end of the internship.

- **Other quality criteria:** Access to social protection, redress mechanisms in cases of abuse, transparent advertisement and recruitment processes and restrictions on the ratio of interns to employees represent other important quality criteria for internships.

Unfortunately, information on national level internship policies in Europe and the experience of young interns is not widely available. This means that exploitative practices enabled by gaps in policy frameworks can remain a hidden problem with little action taken by policy-makers.

To overcome this problem, we designed a questionnaire for national level youth organisations covering the different quality criteria above, as well as examining the research that does exist on internship policies. We received responses from 19 youth organisations (a full list can be seen at the beginning of the report), the majority of which are National Youth Councils, but also national student organisations and the youth sections of trade unions, in addition to support from the European Trade Union Confederation Youth Committee.

The research and the questionnaire enabled us to identify countries with the best and worst practice and they have been presented in the profiles within this report. Within each profile, the information is outlined according to the quality criteria we defined and each country ranked from best to worst depending on their performance across the criteria. In addition to the in-depth profiles, we provide an overview of all the other countries analysed as part of the project in the annex.





France



Internship Laws

- Internships are strictly regulated and can only take place within formal education curricula
- Interns are entitled to all the rights guaranteed to regular staff (such as social protection and redress mechanisms)



Unpaid Internships

- Internships lasting two months or less as part of education can be unpaid
- Interns working for more than two months are entitled to at least €3.90 per hour, equal to approximately €600 per month (depending on the number of days worked)
- Unpaid internships outside education are illegal but on rare occasions do take place

Country Profile

Legal status of interns

Stages (internships) are strictly regulated in French law. They must be current, full-time students of an accredited educational institution to be eligible, meaning open labour market internships are prohibited. A tripartite written contract between the employer, intern, and the school is required and no internship can be longer than six months. The intern is also added to the employer's staff register, which enables labour inspectors to investigate employers to check if legislation is implemented.

Interns who work 308 hours or more (more than two months) are generally entitled to the same rights and protections as regular employees, with one important exception as their compensation is set at a level below the national minimum wage.

Remuneration

Any internship equal to and longer than 308 hours (two months) must be compensated with at least €3.90 per hour, approximately €600 per month (the statutory minimum wage in France is €1,555 per month).

In addition to compensation, interns are also entitled to food vouchers, transportation subsidies, and all other basic social protection such as paid sick leave, holiday leave and maternity leave.

Illegal unpaid internships on the open labour market are reported to take place, where employers use a fake university to give the impression that the young person is still in education to circumvent the laws. These are rare, but demonstrate that enforcement of the law could be improved.

Learning components

The educational institutions the interns are affiliated with usually require learning standards to be included in the contract. French law also stipulates that a tutor must be assigned to the interns. It is encouraged to provide the interns with regular feedback and an end-of-internship evaluation. In fact, interns must complete a *rapport de stage* for their schools to detail their responsibilities and experiences.

Some interns learn by completing regular tasks autonomously, but legislation forbids using interns to fulfil tasks generally performed by regular staff.

Other quality measures

Other measures to prevent replacing staff with interns and to encourage youth employment include

- limiting the intern-to-staff ratio to 10% of the number of employees.
- allowing the internship period to replace regular probation periods if interns are hired as regular staff afterwards.
- imposing mandatory breaks for employers between hiring interns again for the same position (the break must equal at least one-third of the entire internship period).

Conclusion

France's national internship policy covers almost all aspects concerning internships, guaranteeing interns access to basic rights, compensation and preventing companies from hiring interns as a cheap replacement for regular staff. Youth organisations in France do highlight that it could be further improved by extending compensation and social protection also to interns who work less than 308 hours. Nevertheless, the French model is the most comprehensive and strictest in Europe.

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Romania



Internship Laws

- Internships are highly regulated with specific legislation that outlines clear employment and training rights for interns as well as conditions on employers to promote quality internships



Unpaid Internships

- Interns are entitled to 50% of the minimum wage, equivalent to about €236 per month
- Unpaid internships on the open labour market are illegal, but the laws are circumvented by employers who occasionally advertise illegal unpaid internships

Legal status of interns

A written contract is required between the employer and intern, and the internship cannot exceed six months in duration. Basic social protection such as annual leave, health insurance and unemployment benefits are mandatory (although paid sick leave is not provided), and they are protected under the same redress mechanism as the staff in the case of abuse and harassment. Moreover, specific legislation fosters a transparent and fair recruitment process that curbs discrimination.

On top of this, the number of interns cannot exceed 5% of the total number of employees in an organisation, and the government provides a subsidy of approximately €1,000 to employers who hire young people for a minimum of 2 years after their internship contract is completed.

Remuneration

Unpaid internships are illegal according to national legislation, and interns are entitled to 50% of the national minimum wage, amounting to €236 per month.³ However, according to the National Youth Council of Romania, some employers avoid these rules by illegally offering unpaid internships without explicitly calling them an internship to circumvent legislation, even if in practice it meets all the criteria for one.

Learning components

Learning objectives and plans must be included in the written contract with interns. Interns are also guided by a mentor, and if the organisation has more than 12 interns, an intern coordinator must be assigned. Regular feedback and evaluation to the interns are encouraged to enhance the learning experience. Upon completion of the internship, a certificate must be provided.

Conclusion

Romania can be regarded as having one of Europe's most comprehensive legislations on internships to ensure a structured programme to protect young people transition into work. From the accounts of our member organisation, exploitation and unpaid internships do exist.⁴ However, these instances are clearly stated as illegal practices, and other conditions are in place to promote good practice by employers, such as limits on the number of interns in one organisation. The drawback of the Romanian framework is insufficient enforcement of the law, the lack of paid sick leave and below minimum wage remuneration for interns which may expose them to poverty and restrict opportunities for marginalised youth to take up an internship.

The government provides a subsidy of approximately €1,000 to employers who hire young people for a minimum of 2 years after their internship contract is completed.

3. The national minimum wage of Romania is equivalent to €472 per month. Eurofound (2021) [Minimum wages in 2021: Annual review](#).

4. For example, interns might be handed too much work and menial tasks that are considered undesirable by other staff members, contributing to overwork and stress.

3 Croatia



Internship Laws

Open labour market internships are not defined or regulated by law and are also not common in Croatia, but other forms of internships exist and are subject to regulation:

- Internships as part of formal education curricula
- Active labour market policy (ALMP) internships organised by public employment services for unemployed young people



Unpaid Internships

- There is no obligation to provide compensation to internships in education and they are often unpaid
- ALMP interns receive 85% of the salary of the job they perform
- Unpaid internships on the open labour market are illegal and do not take place in Croatia

Legal status of interns

Internships are legally regulated as part of education curricula and post-education ALMP internships. They can be catered to youth at different educational levels, from students in high schools to higher education.

ALMP internships are recognised as workers, and written contracts must be reviewed by the National Employment Service, and social protections enjoyed by regular workers granted to the interns. As part of formal curricula, internships tend to be less protected since they are not deemed part of the labour force and it is not obligatory to have a written contract.

Whether interns have access to redress mechanisms depends on the internal rules of the company, in practice many do not have access. The National Youth Council of Croatia notes that employers are less inclined to extend or renew the contracts of interns who ask for maternity or paternity leave.

Remuneration

Previously unpaid ALMP internships have been promoted by the Croatian government, but these programmes have been replaced by a new ALMP internship policy which ensures a minimum remuneration of 85% of the salary for the job role. The amount depends on the job they perform and the industry they are in, with no ceiling in place on the amount they can receive, typically the level of

remuneration is above the national minimum wage. Unpaid internships on the open labour market are illegal in Croatia and the law on this is followed with no practice of unpaid internships outside of education.

However, there is no obligation to provide any compensation to internships undertaken during education and in practice the majority are unpaid, especially in the fields of health, social work and education.

Learning components

Provisions to facilitate learning for interns are encouraged in the national policies, such as assigning mentors or supervisors, giving regular feedback, and providing an evaluation. However, they are often not implemented in practice.

Conclusion

Croatia's policy to categorise ALMP interns as workers brings a number of important benefits such as having the written contracts reviewed by the National Employment Service, granting full social protection, and a minimum level of remuneration. However, stronger implementation of the training requirements for internships is required. The lack of measures to ensure any compensation to interns enrolled in education should also be addressed by the Croatian government to ensure a decent standard of living and equal opportunities.



Bulgaria



Internship Laws

Internships are regulated with dedicated legislation that entitle young people to equal rights as other workers (minimum wage, social protection). The types covered are:

- Praktika (practice) - internships for youth who engage in secondary vocational education
- Curricula internships for students enrolled in higher education
- Post-education internships on the open labour market



Unpaid Internships

- Unpaid internships taking place outside the dedicated internship laws are legal and a common occurrence
- For open labour market internships that follow the internship laws, interns are entitled to at least the national minimum wage, equivalent to €332 per month.

Legal status of interns

A tripartite agreement between the employer, the intern, and the educational institution is required for internships within the education curriculum, while only a bilateral one is needed for open labour market internships.

Nevertheless, both forms of internships are regulated by employment law, with most open labour market internships subject to the provisions of Article 233 of the Labour Code, which sets out internship regulations for young people up to age 29 without work experience. According to this legislation employment rights such as remuneration and social protection (health insurance, paid sick leave, maternity and paternity leave, and unemployment benefits) are all provided to interns and the duration of an internship is limited to between 6 and 12 months.

Interns should be entitled to the same redress mechanisms as regular staff in cases of discrimination and abuse and advertisement and recruitment process should be transparent to prevent discrimination and nepotism.

Remuneration

Interns falling under the provisions of the Labour Code are entitled to at least the national minimum wage, which is currently set at €332 per month⁵.

However unpaid internships are common according to the National Youth Forum of Bulgaria (NYF) and often a legal practice, usually taking the form of 'summer internship programmes' which typically last 2 months in duration. This provides an option for many internships to circumvent the quality criteria outlined in the Labour Code.

NYF also highlights that abuse of interns often occurs, with cases where employers have hired interns in the summer to cover for other staff being on leave, and quickly dismissing them once other staff return.

Learning components

Internships in Bulgaria are generally well-structured with learning objectives and plans included in the written contract, and regular feedback and end-of-internship evaluation are provided to the interns during their training. For open labour market internships meeting the provisions of Article 233 of the Labour Code, it is mandatory to assign a mentor with at least 3 years experience to the intern.

Conclusion

Bulgaria has dedicated legislation on internships that sets out clear measures to protect their quality. More importantly, this legislation recognises that internships are fully covered by labour law, such as the entitlement to national minimum wage (although, the adequacy of the minimum wage should be improved) and access to social protection. However, these measures to ensure the quality of internships are severely undermined by the fact that employers can circumvent these rules through unpaid internships, which are not prohibited by law.

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5. Eurofound (2021) [Minimum wages in 2021: Annual review](#).



Austria



Internship Laws

There is no specific regulation or definition of internships. However several types of internship practices can be identified:

Fachhochschulen: Compulsory internships as part of formal curricula for certain professions (such as law and medicine)

Ausbildungsverhältnis or *Volontariat*: non-mandatory internships during education or after graduation

Schnupperlehre - short-term job shadowing



Unpaid Internships

- Internships on the open labour market should in theory be remunerated according to sector specific collective bargaining agreements
- However internships on the open labour market can be legally unpaid if categorised as an educational relationship and this commonly takes place
- Internships undertaken as part of education are usually unpaid

Legal status of interns

There is no legal definition of internships in Austrian law, but internships as part of education and post-education are common.

In Austria the law distinguishes between relationships with employers that are educational (characterised by a lack of obligation to perform work) and those that are work relationships, which must follow general labour law. The ambiguity around the legal status of interns means that employers can define internships as an educational relationship and avoid any obligations they would have to them as employees, even if the intern is in practice performing work for their employer. A contract is needed for post-education internships, however these can be simply verbal contracts, whilst internships included in formal education require an agreement that should adhere to training regulations and the curricula. Social protection such as paid leave, unemployment benefits, health insurance, and redress mechanism in cases of abuse and harassment are only granted to post-education internships classified as an employment relationship and therefore covered by general labour law, while those categorised as an educational relationship (during or post education) do not provide any access to social protection. Similarly, only internships covered by general labour law are required to meet policies on transparent and fair recruitment processes. As there is no specific regulation on internships there are no restrictions on their duration.

Remuneration

Austrian law suggests that unpaid work should not exist. However, a significant loophole allows unpaid internships to legally exist, even if outside of education, as long as they are framed as an educational relationship. The Austrian National Youth Council reports that in practice unpaid internships after

education are somewhat common, showing that this loophole is taken advantage of by employers, whilst the majority of those taking place during education are unpaid. Unpaid internships are especially common in the health and social care sectors, as well as the media, cultural and creative sectors.

As there is no statutory minimum wage, with remuneration being subject to collective agreements which vary by sector, it is difficult to identify an average level of remuneration received by interns when they are paid.

Learning components

Apart from compulsory internships in sectors such as law and teacher training, most internships do not have regulations regarding learning components to ensure maximum educational benefits for interns.

Conclusion

The lack of regulation and definition of internships in Austria leaves a significant loophole where young people can be denied their rights to fair pay and social protection in 'educational' internships that take place after graduation. The existence of verbal contracts also contributes to the precarity that young interns face in their working conditions, whilst the lack of measures to ensure the quality of the learning content increases the risk that young people are simply carrying out work through unpaid labour, rather than developing their skills.



Ireland



Internship Laws

- There is no legal definition of an internship or specific internship contract in Ireland, but they are a common practice for young people in education and on the open labour market



Unpaid Internships

- Unpaid work is illegal in Ireland, but the law is often not enforced when it comes to internships, with unpaid internships a common practice and often advertised publicly

Legal status

There is no legal definition of internships in Ireland. General labour law should apply to internships, and interns should be entitled to the same rights as other workers, including access to social protection, the minimum wage and other measures such as protection from sexual and other types of harassment or discrimination.⁶ However, employers often choose not to recognise interns' entitlement to labour law arguing that they are not performing work of value, with the government normally turning a blind eye to this and leaving young people unable to access their employment rights with even a written contract being at the discretion of the employer.

Remuneration

Legally, the national minimum wage, €10,20 per hour, is guaranteed to workers. The government outlines that anyone performing work that is of value to the employer should be recognised as a worker and covered by the minimum wage.

However, people aged 19 and below are unfairly subject to lower rates. Moreover, employers may argue that interns are not producing work of value to the company and therefore they have no obligation to treat them as a worker. Unpaid internships are especially prevalent in sectors such as NGOs, media and culture. They have also been actively promoted through government schemes, such as JobBridge.⁷

6. Irish Congress of Trade Unions. [Interns Rights](#).

7. Indecon. Indecon evaluation of JobBridge activation programme. 2016.

Learning components

Apart from compulsory internships for specific professions, such as medicine, engineering, and law, a structured learning programme is not required.

Conclusion

Whilst many internships adhere to labour law, the National Youth Council of Ireland highlights that unpaid internships remain a common practice in Ireland, demonstrating a serious lack of action by the government to ensure employers comply with the law against unpaid work. This is made even worse by the fact that there are no requirements to ensure quality training is provided to the intern, even when an internship is categorised as an educational opportunity by an employer. This leaves young people vulnerable to not having any employment rights and unable to learn skills to support their development.

People aged 19 and below are unfairly subject to lower rates. Moreover, employers may argue that interns are not producing work of value to the company and therefore they have no obligation to treat them as a worker.



Germany



Internship Laws

- There is not one specific law that defines and regulates internships, a number of different categories of internships exist in Germany which are subject to different conditions:
- Mandatory internships as part of education curricula (such as for law and medicine)
- Voluntary internships during education
- Internships on the open labour market



Unpaid Internships

- It is common for internships lasting less than three months to be unpaid, and this is legal.
- Internships lasting longer than three months must comply with the minimum wage, except for those that are a mandatory part of education curricula

Legal status of interns

There is usually a written contract between the employer and intern, but it is not legally required and can be just a verbal contract. Internships lasting longer than three months (apart from mandatory ones during education) provide access to basic social protections and labour rights such as access to redress mechanisms, on an equal basis as regular employees.

Remuneration

Internships lasting up to three months can legally be unpaid in Germany, those longer than three months must comply with the national minimum wage of €9,50 per hour. Mandatory internships as part of education can legally be unpaid even beyond three months.

Despite the fact that internships even below three months in duration are often remunerated in line with the minimum wage of €9,50 per hour, many only provide a stipend. The German government offers three month internships with an expense allowance of €300 per month (which is subject to taxation, and the allowance for interns was the same 10 years ago, whilst the minimum wage has steadily increased since its introduction in 2015)⁸.

Learning components

Apart from the strictly structured mandatory internships, such as for law and medicine students, most internships in Germany do not focus on and are not required to have educational elements.

Conclusion

The existence of three month unpaid internships in Germany, whilst short in duration, pose a significant risk of exploitation, especially as there are almost no measures to ensure that these positions provide good learning opportunities and there is no obligation for a written contract. This system can easily be abused to hire young people as unpaid labour with little or no training provided. Even when a stipend is provided, it is often insufficient to cover living costs for marginalised youth who remain unable to access the positions⁹, meaning that these entry routes into the world of work tend to be accessed only by those who can afford them. This is further compounded by the lack of any compensation for mandatory internships in education.

8. German Federal Ministry of Labour and Social Affairs. [Internships](#)

9. According to the Fair Internship Initiative's Internship Survey Report of 2017 marginalised youth were just as unlikely to be able to access unpaid internships as those with a small stipend

Conclusion and Recommendations

This mapping of internship policies has revealed the wide diversity in quality that exists in Europe. France and Romania stand out as the two best policy frameworks of the countries we have examined, with specific regulations that set out clear employment and training rights for interns and conditions on employers to ensure good practice (although in each case youth organisations point to a number of measures needed to further promote quality).

At the other end of our ranking Austria and Ireland outline no specific regulations for internships and the freereign given to employers to define the internship relationship as 'just an educational experience' is frequently exploited to hire young people as unpaid interns with no guarantee of quality training opportunities. In Bulgaria the high quality regulations for internships are undermined by the legal practice of unpaid internships outside of the legal framework, making it very simple to circumvent the regulations on internships. In Germany

unpaid internships during and outside of education are actually a legal practice (if less than three months) and with no measures to enforce quality training; this leads to a system that can easily be abused to use interns simply as free labour.

The analysis highlights that in many countries young people are unprotected by the policies in place at national level, either through policies that legalise exploitative practices, or loopholes that allow them to take place. To address this, we call on national governments to implement the best practice highlighted in this report:

- Where internships exist outside of education, interns must be clearly recognised as employees, entitled to the application of general labour law on an equal basis as other workers (for example coverage under minimum wage laws or collective agreements, social protection, redress mechanisms in case of abuse)



- All internships must be based on a written contract and include measures to ensure quality training (such as the assignment of a mentor, a written learning plan, the provision of regular feedback and a certificate upon completion.)
 - Other important measures to guarantee quality include:
 - A maximum ratio of interns to staff
 - A maximum length of duration of an internship (for example 6 months, as in France)
 - Financial incentives to encourage employers to hire interns permanently
 - The enforcement of internship legislation to prevent illegal practices
 - Break periods for employers between the hiring of interns
 - Transparent advertisement and hiring
 - Compensation such as a stipend for internships undertaken during formal education

France and Croatia provide good examples of where internships are restricted, only taking place in education or through active labour market policies. This can be one method to help promote the creation of quality entry-level jobs, as employers must offer employment that adheres to general labour law rather than exploiting the opportunity to

circumvent these laws through lower quality internships.

Providing compensation for internships taking place during education can help to cover living costs for an intern and ensure that the internship is accessible for those with low income (as is done in France). However, it is critical that provisions are in place to ensure that internships during education are learning experiences that contribute towards an intern's formal education, to prevent them being used to perform work normally carried out by employees. Without measures to guarantee the learning dimension, then the intern essentially becomes an employee without any employment rights.

The failures in internship policies across a number of EU Member States investigated in this report also highlights the limitations of the European Quality Framework for Traineeships, which sets out policy recommendations on open labour market internships for EU Member States. The recommendations in the Quality Framework are silent on whether internships should be remunerated at all and at what level, in addition there is no guidance on what access they should provide to social protection. These gaps allow for loopholes and exploitative policies at national level to be continued, where

employers have power and discretion to force unfair conditions on interns.

To ensure better outcomes for young people it must be updated with a binding requirement for all open labour market interns to be recognised as employees and entitled to either the statutory minimum wage or coverage under collective agreements - without exceptions, as well as full access to social protection on an equal basis as other employees.

By taking action at EU level to ban unpaid internships and the introduction of quality internship policies at national level we can take important steps towards equal opportunities for all young people as well as contributing to a more secure transition from school to work that is free from precarious jobs.

The analysis highlights that in many countries young people are unprotected by the policies in place at national level, either through policies that legalise exploitative practices, or loopholes that allow them to take place.

Annex - Overview of Internship policies in Europe

Based on feedback from youth organisations

	Austria	Belgium	Bulgaria	Croatia	Cyprus	Czechia	Denmark	Estonia	Finland	France	Germany	Greece	Hungary	Ireland	Italy	Latvia	Lithuania	Luxembourg	Malta	Netherlands	Poland	Portugal	Romania	Slovakia	Slovenia	Spain	Sweden	
Legal Status - Type of regulation*																												
Unregulated	✓				✓	✓	✓		✓		✓	✓		✓				✓		✓	✓				✓			✓
Regulated but low quality		✓	✓					✓					✓		✓	✓	✓		✓							✓	✓	
Regulated and high quality										✓												✓	✓					
Banned from labour market				✓						✓						✓												
Remuneration																												
Are unpaid internships legal?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓#	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
How common are unpaid internships within education?*	C	V	C	V	C	C	V	V	C	U	U	V	C	C	U	C	V	C	C	V	U	U	U	U	V	V	V	C
How common are unpaid open market internships?*	C	C	C	U	C	U	V	V	C	N/A	U	V	C	C	U	N/A	V	C	V	V	U	U	C	V	V	C	C	
Social protection																												
Internships within education	X	X	✓	X	X	X	X	X	###	✓	X	X	✓	X	X	X	X	X	X	X	X	X	X	X	X	X	✓	✓
Internships outside education	✓	X	✓	✓	X	✓	X	X	###	N/A	✓	X	✓	✓	X	N/A	X	X	X	✓	X	X	X	X	X	X	✓	✓
Learning components																												
Are there measures to ensure quality learning opportunities?	X	✓	✓	X	X	X	X	X	X	✓	X	X	X	X	X	✓	X	X	X	X	X	X	✓	✓	✓	X	X	X

* **Unregulated** - There is no specific regulation or definition of internships. General labour laws should apply but as internships are a grey area in the law, they can be circumvented.

Regulated but low quality - Internships are specially regulated, with dedicated internship contracts. However, interns are not entitled to the same conditions (minimum wage, social protection etc.) as other employees.

Regulated and high quality - Internships are specially regulated, with dedicated internship contracts. Interns are entitled to the same conditions (minimum wage, social protection etc.) as other employees.

Restricted to education - Internships are specially regulated and can only take place in the framework of education, internships on the open labour market are banned.

** V - very common, unpaid internships represent the majority of the country's internships
C - common, unpaid internships are common
U - uncommon, unpaid internships are rare
X - no, unpaid internships are outlawed

Student internships up to 2 months in duration can be unpaid

Social protection for interns in Finland are not divided by categories of within and outside education. Instead, interns who have contracts are fully protected, while uncontracted and unpaid interns have no protection.



