Quality Standards for the Youth Guarantee

Consultation Results
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## Acknowledgements

This publication was created with the contributions of the following organisations:

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<th>European Youth Forum Member Organisations:</th>
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<tr>
<td>Συμβούλιο Νεολαίας Κύπρου (CYC) - Cyprus Youth Council</td>
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<tr>
<td>Mreža mladih Hrvatske (MMH) - Croatian Youth Council</td>
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<tr>
<td>O Conselho Nacional de Juventude (CNJ) - Portuguese Youth Council</td>
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<td>The National Youth Council of Ireland (NYCI)</td>
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<td>De Vlaamse Jeugdraad - Flemish Youth Council of Belgium</td>
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<td>Alliansi - Finnish Youth Council</td>
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<td>Deutscher Bundesjugendring - German Youth Council</td>
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<td>El Consejo de la Juventud de España (CJE) - Spanish Youth Council</td>
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<tr>
<td>The European Trade Union Confederation Youth Committee (ETUC Youth)</td>
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<td>The European Confederation of Independent Trade Unions Youth Section (CESI Youth)</td>
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<th>External Partners:</th>
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<td>European Federation of National Organisations working with the Homeless (FEANTSA)</td>
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<td>European Roma Grassroots Organisations Network (ERGO)</td>
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<td>European Disability Forum (EDF)</td>
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<td>Platform for International Cooperation on Undocumented Migrants (PICUM)</td>
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<td>European Council on Refugees and Exiles (ECRE)</td>
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<td>StartNet – network transition education to work</td>
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We are extremely grateful for all the input they provided to help develop these quality standards.

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Too often, the offers provided by the Youth Guarantee are limited to low-paid and temporary positions. For many young people who find themselves stuck in cycles of insecure temporary work like unpaid internships, these offers are failing to provide the much needed security and support of quality jobs. This needs to change!

What does a ‘good quality offer’ under the Youth Guarantee look like?

Read our Quality Standards below, to find out.

WE DESERVE QUALITY JOBS!

The Youth Guarantee must provide opportunities that result in positive, long-term outcomes for young people.

- A secure job with long-term prospects and access to social security systems.
- Fair pay based on a living wage.
- Decent work conditions with a safe workplace and protection for mental and physical health.

WE WANT TO LEARN NEW SKILLS FOR THE FUTURE!

The Youth Guarantee must provide opportunities that help develop the skills necessary for the future of work.

- Effective support from services with professionals who are specially trained to work with young people and have time and resources to give quality support.
- A person-centred approach where young people are seen as equal partners and are empowered to set their own goals.
- Strong social safety net that prevents young people from falling into poverty.
- Additional opportunities provided beyond the offer itself that helps prepare young people for employment.

PROTECT AND MONITOR THE QUALITY OF OUR YOUTH GUARANTEE!

The Youth Guarantee must always be striving for quality, now and in the future.

- Meaningful partnerships where organisations that represent young people have a real say in discussions and decision-making at all stages in the management of Youth Guarantee schemes.
- Comprehensive data that can effectively show how the Youth Guarantee is reaching out to different groups of young people and records their progress.
- Independent monitoring by an independent organisation responsible for upholding quality in the Youth Guarantee and evaluating young people’s experiences, good and bad.
Introduction

The Youth Guarantee is an EU commitment to ensure that young people will receive a good quality offer of employment, training or further education within four months of becoming unemployed or leaving formal education. Since 2013, the Youth Guarantee has been a key EU scheme for supporting young people in their school-to-work transition, a much-needed initiative following the 2008 financial and economic crisis which led to very high levels of youth unemployment.

However, the lack of quality offers has been one crucial gap in the implementation of the Youth Guarantee at Member State level. Without quality standards at EU level which outline minimum criteria for offers under the Youth Guarantee, too much is left to the discretion of Member States and employers.

The European Commission’s 2020 proposal for the Reinforcement of the Youth Guarantee represented a chance to fill these gaps. However, the proposal, while introducing several improvements to the policy framework and highlighting the importance of quality offers, does not include or foresee the development of specific quality standards.

The development of quality standards for the Youth Guarantee has been identified by our Member Organisations as a priority that needs to be addressed in order to achieve better outcomes for young people in Europe. As outlined in our policy positions, many young people receive one-size-fits-all offers that do not match their interests or skills or offers which do not guarantee their rights, including the right to a fair wage or to adequate social security. Therefore, young people often become stuck in cycles of insecure, temporary work. Through the development of quality standards for offers under the Youth Guarantee, many of these shortcomings could be addressed.

Moreover, ensuring that initiatives such as the Youth Guarantee provide quality opportunities for youth is essential to achieve the overall objective of providing quality employment and educational opportunities to young people in order to support their transition from school to work, to foster their independence and to ensure they have access to stronger employment and financial security.

This is particularly relevant both in the context of the upcoming recession as a consequence of the Covid-19 pandemic which is bound to have a disproportionate impact on youth, as well as in the context of the changing world of work which is leading to more difficult transitions from school to work for young people. For years, we have witnessed an increase in the rate of low quality, precarious work, which has made youth more vulnerable in the context of this new crisis. As the Youth Guarantee is seen as a key tool to support young people in navigating yet another recession, it is essential that the scheme contributes to more youth-friendly labour markets that provide quality employment opportunities.

So, what does a ‘good quality offer’ under the Youth Guarantee look like? This technical paper provides an answer to this question by presenting the results of a consultation with Member Organisations of the European Youth Forum, including National Youth Councils and International Non-Governmental Youth Organisations which represent and work directly with young people.

These standards cover all the different types of Youth Guarantee offers. Additionally, this document touches upon the wider support from services and social protection schemes linked to the Youth Guarantee which play an important role in promoting positive outcomes for young people. Furthermore, our quality standards refer to mechanisms for monitoring quality, which can help to ensure effective implementation.

An additional section provides details on what quality support looks like for different groups of young people. This section was developed with the input of European Civil Society Organisations which represent and work with specific groups of vulnerable people. Young people who are not in employment, education or training (NEET) face very different challenges and require specialised support.

Lastly, these quality standards build on a number of existing European Youth Forum policy documents:

- European Quality Charter on Internships and Apprenticeships
- Policy positions on the Youth Guarantee
- Policy position on Inclusive Education
- Policy position on Quality Apprenticeships
- Resolution on Youth Autonomy and Inclusion
- Policy paper on the Future of Work

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1 European Commission (2020) Proposal for a Council Recommendation on A Bridge to Jobs - Reinforcing the Youth Guarantee
3 European Youth Forum (2020) The Future of Work and Youth
6 European Youth Forum (2011) European Quality Charter on Internships and Apprenticeships
7 European Youth Forum (2018) Position on Quality Apprenticeships
8 European Youth Forum (2015) Position paper : Two years after: the implementation of the Youth Guarantee
9 European Youth Forum (2015) Position paper : Two years after: the implementation of the Youth Guarantee
10 European Youth Forum (2016) Resolution on Youth Autonomy and Inclusion
12 European Youth Forum (2018) Position on Inclusive Education
13 European Youth Forum (2016) Resolution on Youth Autonomy and Inclusion
This paper outlines the key findings from a consultation process carried out with Member Organisations of the European Youth Forum in the first half of 2020. The consultation aimed to gather the views of Member Organisations which have expertise on the Youth Guarantee and which follow its implementation at local level.

The consultation process involved ten European Youth Forum Member Organisations: eight National Youth Councils, recognised as the national coordinating bodies for youth organisations within their country and two International Non-Governmental Youth Organisations representing the youth sections of trade unions. Additionally, six of the main European Civil Society Organisations and networks working on youth transitions and representing specific vulnerable groups were consulted. Altogether, these represent national, regional and local organisations representing or working with youth - with a reach of millions of young people across Europe.

The consultation began with a series of qualitative interviews in order to gather the experience of National Youth Councils on the quality of Youth Guarantee offers and also recommendations for standards that could apply to the Youth Guarantee. Following this, International Non-Governmental Youth Organisations and European Civil society Organisations were consulted to ensure that the quality standards take into account the needs and rights of different groups of young people, including the most vulnerable, and to ensure that offers under the Youth Guarantee uphold the employment and social rights of young people.

The standards included in this document are the result of this consultation process and provide a clearer definition of what constitutes a ‘good quality offer.’

Currently, the systems that most Member States have in place to measure the quality of Youth Guarantee schemes work by monitoring the employment status of young people after they have left the scheme. This allows for evaluation of the impact on young people six to twelve months after taking part, but it does not reveal information on the quality of the offers themselves that are provided.

Attention should be paid to the quality of the offers themselves to determine whether they are providing opportunities that indeed support positive long-term outcomes for young people who currently face significant challenges in the transition from school to work. This is indicated by high rates of young people not in employment, education or training in many Member States and that more than one in four young people are at risk of poverty in the EU12. Many go into precarious work situations preventing them from achieving independence and social inclusion. Therefore, Youth Guarantee offers should address this structural problem.

The statistics illustrate the issue. In 2016 in the EU, 43.8% of young people aged 15-24 were in temporary forms of work, as opposed to 13.1% of people aged 25-49. In addition, 13% of young people work without any contract at all. Around 60% of temporary workers in 2017 indicated that they could not find a permanent job, whilst transition rates from temporary to permanent contracts tend to be low in countries where temporary employment is more common. For example, in Spain fewer than one in six temporary workers moved to a permanent contract in 2015-2016.

Individuals in non-standard employment, like temporary or part-time work, are less likely to have access to full employment rights, social protection and representation. The lack of employment security and the often low-paid nature of non-standard work is detrimental to workers’ health, job satisfaction, and even extends to the employer through lower productivity.

The particular vulnerability that young people face has been demonstrated by the social and economic impact of Covid-19. An ILO survey shows that one in six young people have stopped working since the start of the crisis. An OECD survey shows 40% of young people express great concerns about their employment status and their disposable income.

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12 Eurostat (2018), People at risk of poverty or social exclusion by age and sex
13 Eurostat (2017) Temporary employment in the EU
14 Eurofound (2017) 6th European Working Conditions Survey
15 Eurofound (2020) Labour market change: Trends and policy approaches towards flexibilisation
18 European Youth Forum (2020) The European Youth Blueprint to Recovery
On top of this, Eurostat statistics show that youth unemployment rose four times faster than the rest of the working population over the two months following the emergence of the crisis in Europe. Youth Guarantee schemes and other policies developed as a response to the Covid-19 crisis should ensure that public funds are used to create quality employment opportunities, based on specific standards. This can contribute to a stronger recovery in the long run by ensuring that young people are in more secure forms of employment and by preventing public funds from being used to prop up precarious forms of employment.

For young people registered in the Youth Guarantee, the quality of the support they receive beyond the offer itself plays a significant role. Evidence from initiatives such as the Ballymun Youth Guarantee pilot project in Ireland show that in-depth needs assessment and career guidance by specially trained professionals, integrated support (for example, access to mental health and addiction counselling) and a person-centred approach are important for achieving positive results, especially when working with young people furthest from the labour market.

The implementation of quality standards for this wider support alongside the offers themselves will make the interventions lead to more sustainable and long-term positive outcomes for young people. More specifically, it will ensure that the range of barriers facing young people are addressed, that their personal growth is made a priority and that they can access quality employment.

“Non-standard work is detrimental to workers’ health, job satisfaction, and even extends to the employer through lower productivity”

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<tr>
<th>Additional criteria for internships and apprenticeships:</th>
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<td>Priority is given to offers of full-time, permanent contracts.</td>
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<td>The duration of any temporary contract is at least as long as the contribution period to access unemployment benefits.</td>
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<td>Financial incentives encourage employers to make young persons on a temporary contract permanent.</td>
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<tr>
<td>Young persons on a temporary contract will have a mid-term evaluation with the employer and the public employment services (and education institution if applicable) to discuss progress and the possibility to be hired as permanent employees and given a final evaluation at the end of the temporary contract.</td>
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<tr>
<td>The contract gives the young person full access to social security systems, including health insurance, paid sick leave, unemployment benefits, disability leave, pension, and accident insurance.</td>
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<td>In the case of parental leave, accident or long-lasting illness, young people have the right to return to their position, either in the original post or in a suitable alternative.</td>
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OECD (2020) Youth and COVID-19
Eurostat (2020) March EU unemployment
Eurostat (2020) April EU unemployment
Ireland Department of Social Protection (2015) Key Learning from the Ballymun Youth Guarantee Project
Remuneration is based on a living wage. This is calculated by determining the income required for a basket of goods and services needed for a decent standard of living in a local area, including the hidden costs of employment, such as transport. At the very minimum, remuneration is equal to the national minimum wage, wage levels established by collective agreement or 60% of the national median income (whichever is highest).

The level of remuneration takes into account the tasks performed by the young person.

Overtime is additionally compensated, either financially or with time off in lieu.

Equal wage levels apply regardless of age, gender, ethnic background, disability or any other characteristic.

Weekly hours are equal to the average set by labour legislation or collective agreements.

The young person is entitled to at least the minimum level of paid leave set out in national legislation.

The workplace meets health and safety standards set out in national legislation, collective and/or sectoral agreements, or other binding documents and the young person does not work in a position where their physical or mental health is at risk.

Reasonable accommodation is provided if the person needs workplace adjustments to carry out their tasks.

Discrimination on any grounds is combattled both in recruitment practices as well as in the workplace.

The young person has access to a trade union representative and the workers’ council.

A supervisor is responsible for monitoring the young person’s progress and providing support to safeguard their wellbeing. Where possible, the young person also has access to a representative body of young people.

The position provides training opportunities to gain recognised skills which are set out in learning objectives agreed with the young person.

Learning objectives are regularly monitored and the young person receives recognised certification on completion of training courses.

Special attention is given to the accessibility of learning material, instruction and assessment to ensure the inclusion of young people with disabilities.

Complies with legislation, including tax regulations and collective agreements with no recent records of violation.

No record of recently firing workers before applying for Youth Guarantee subsidies.

Respects a maximum ratio for the number of subsidised workers, interns and apprentices to the overall number of employed workers.

Obligated to hire a certain number of workers on a permanent basis before having the right to more subsidies.

Work is carried out under guidance of a competent supervisor who provides regular feedback and continuous coaching.

The young person gains recognised high quality practical work experience, recognised qualifications, skills relevant to their education and a better understanding of the world of work.

The young person has full access to additional training courses which are available to the other members of staff.

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### A Personalised Offer

- The young person can decide if the offer matches their interests and background, with the option to refuse the offer or to negotiate changes. Alternative offers are provided to give the young person as much choice and ownership as possible.

### Transparent Information and Procedures

- Transparent advertising includes a detailed task description, learning outcomes and working conditions, including remuneration.
- The young person is informed in an accessible way for them when they start of the entitlements and rights provided to them by their contract, workers’ representatives, their responsibilities to the organisation, and any health and safety risks posed to them.
- Young people have access to a complaint channel to report abuses. This complaint channel can be at the host organization, at a trade union presence in the company, or at a third party.

### Accessible to All

- Reasonable accommodation is provided for young people with specific requirements if needed to fulfil the educational programme, such as exams in a suitable form and format, a sign-language interpreter if requested and adapted reading material.

### Recognised and Applicable Qualifications

- Education and training offers provide recognised vocational qualifications or formal education qualifications.
- The education or training offer takes into account local labour market trends and realities, allowing the young person to gain relevant skills that will allow them to take up opportunities for decent work in the labour market.

### Continued Education and Training Offers

- The young person can decide if the offer matches their interests and background, with the option to refuse the offer or to negotiate changes. Alternative offers are provided to give the young person as much choice and ownership as possible.
- All offers take into consideration the level of experience, qualifications and skills of the young person in order to prevent placements where the young person is overqualified or any other type of mismatch.
- The young person and youth organisations participate in the design of educational courses.

- Education and training offers are provided to young people with specific requirements if needed to fulfil the educational programme, such as exams in a suitable form and format, a sign-language interpreter if requested and adapted reading material.
- All offers take into consideration the level of experience, qualifications and skills of the young person in order to prevent placements where the young person is overqualified or any other type of mismatch.
Public employment service professionals are specially trained to work with young people from a variety of backgrounds. They have sufficient time and resources to provide quality support tailored to the particular situation of each young person.

An integrated approach enables effective coordination between services and professionals (such as health and social services) to provide specialised support for young people to address their individual barriers.

Regular support and contact is provided during placements to assess the young person’s progress and to ensure that the quality of the offer extends into the young person’s actual experience.

Public employment services have the capacities and in-house knowledge to identify wider and local labour market trends which inform the offers provided to young people.

The quality and availability of services is consistent across the country.

Young people are made aware of their employment and social rights in a way that is accessible to them.

Support is person-centred with a personal plan jointly agreed upon by the young person and professional. Offers to the young person are clearly part of a pathway to achieve the goals set out in the personal plan.

Activation policies focus on empowerment and building trust between the services and the young person to keep them motivated, using incentives rather than sanctions.

Young people are seen as equal partners and as experts in their own lives who share decision-making with services and professionals.

All young people have access to unemployment benefits or minimum income of an adequate level (based on a reference budget and the poverty line of 60% of the median income).

The quality and availability of services is consistent across the country.

Special emphasis is placed on combining offers with ad-hoc training and counselling (such as language courses for third-country nationals) to young persons from vulnerable groups who face additional barriers.

Opportunities are provided for European mobility experiences, particularly through the Erasmus+ and European Solidarity Corps programmes.

Outreach to vulnerable groups takes place in partnership with youth organisations and organisations representing the target group.

Career management skills are provided to young people in addition to other offers they may receive.
At regional, national and European levels all relevant stakeholders are involved in the design, delivery, management and evaluation of Youth Guarantee schemes. This includes youth organisations, social partners and other civil society organisations working with vulnerable groups such as persons with disability, Roma, migrants, and homeless people.

Partnerships with stakeholders for managing the Youth Guarantee clearly outline the role of each stakeholder, meetings are held regularly, important decisions are taken together with partners, and all relevant information is shared in a transparent way to partners.

Data is available on Youth Guarantee beneficiaries, including the offers they receive and participants’ outcomes after leaving the scheme.

Data is disaggregated for different groups of young people to provide insights on the success of reaching more vulnerable groups.

An indicator on individual learning progress, based on the ‘distance travelled model’ measures achievements beyond employment status.

EU funds encourage compliance by making quality standards an ex-ante conditionality for funds that are used for Youth Guarantee schemes.

An independent organisation that is accountable to young people and has their best interest central in its mission is responsible for the monitoring of the quality of Youth Guarantee offers and wider support, with mechanisms for addressing bad practice and protecting young people.

Young people have access to effective evaluation procedures where they can report their experience and raise complaints with a body that can take effective measures to remedy the situation without the young person’s position being jeopardised.

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Young people who are homeless or at risk of homelessness include: young people in precarious housing situations; people sleeping rough; sofa-surfing on the couches of friends; using emergency accommodation; squatting or taking housing without a tenancy or legal right to reside. An estimated 30% of the homeless population are under the age of thirty. Research shows that homelessness occurring in youth can often become episodic and repeat over a person’s lifetime. Impact of homelessness on education and income: When a young person becomes homeless, it often means they lose touch with their families and social network. This often leads to the young person moving to another location to access support, which may mean they drop out of employment or education in the process. A lack of income can then result in young people being forced into poor housing situations and losing access to quality employment. The Youth Guarantee in its current design does not actively reach out to homeless young people. Homelessness is often a chaotic experience for a young person, and the focus is on survival, rather than long-term planning.

**Support needed:**

Young people experiencing homelessness need support in both the ‘employment’ and ‘social’ domains. A stronger partnership with homeless services could ensure that young people experiencing homelessness are better supported in finding a job. Homeless services provide motivational interviewing, career counselling, vocational training, coaching, and mentoring to help homeless youth access the labour market. Such services can provide their expertise to the European Commission and national governments to improve implementation of the Reinforced Youth Guarantee. The expertise gained in this area can also be fed back into the European Commission’s plans to identify at-risk youth and to tackle issues faced by early school leavers, a practice which is already in place with organisations working on youth homelessness.

**Partnerships:** The Youth Guarantee system should cooperate with homeless services to match marginalised youth to appropriate work, training, and education opportunities. At national level there are many programmes that link homeless young people to employment and education; these can be used as models to scale up within the Youth Guarantee. Such partnerships would allow young people to access employment and training which can allow them to gain the financial resources to access housing in the private rental market and more permanently exit homelessness. At the same time, the partnering homeless service would provide any social support the young person may need while re-entering work.

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26 FEANTSA (2020) *Rebuilding Youth Employment Support: A Bridge to Jobs for the Next Generation*
Young people with disabilities

Young people with disabilities make up a large and diverse group. While the specific needs of each person will differ, some common barriers to participation in the Youth Guarantee stand out.

Disability entitlements and the Youth Guarantee: Disability entitlements are crucial for ensuring a basic income and to cover the extra cost of living that comes with having a disability in a society poorly adapted to the needs of persons with disabilities.

However, participation in the Youth Guarantee often requires young people to give up their disability entitlements. Without these, the young person faces a real risk of being unable to meet their needs with their salary alone and would lose their financial safety net entirely in case of job loss.

Reasonable accommodation: Mainstream public employment services may not provide specialised pre-employment training, vocational guidance and work placement that is accessible to young people with disabilities.

Employers often do not understand how to make changes to the workplace to enable persons with disabilities to effectively do their job, or they are reluctant to do so in case of additional costs. Unfortunately, young people with disabilities are often turned down by employers because of this reason or are taken on without efforts to accommodate their needs, making them unable to do their jobs and to perform to the best of their abilities.

Lack of take-up of support schemes: Most EU Member States have national schemes to support employers and/or employees with disabilities. These schemes can provide material or financial support to cover the costs incurred by accommodating the person with disability or to financially compensate the person’s salary. Often these schemes are not well known by either employees or employers. Even when they are, the considerable administrative burden to implement them can be off-putting for employers.

Barriers during education: The many barriers young people with disabilities face during their education often results in it taking longer for them to gain qualifications. This means that a young person with a disability will likely have accumulated fewer qualifications and less work experience than a person of the same age without disabilities. As a result, people with disabilities are more likely to be in junior positions with poor working conditions for a longer period.

Support needed:

Enhance compatibility between disability entitlements and the Youth Guarantee: Compatibility between the Youth Guarantee and disability entitlements is needed to give young people with disabilities the confidence and security to access the labour market. The system currently exposes young people with disabilities to the risk of in-work poverty and to a loss of their safety net.

Allocate Youth Guarantee funding for reasonable accommodation: Funding in the Youth Guarantee should be specifically earmarked to help employers cover any reasonable accommodation costs to ensure young persons with disabilities are not unfairly denied work placement. More guidance can also be given to employers about simple supportive measures to take into consideration when hiring a young employee with a disability.

Partnerships: National, regional and local disability organisations and other relevant stakeholders can support a reinforced Youth Guarantee by:

- Providing expertise for pre-employment training, vocational guidance and placement services;
- Helping public employment services to carry out awareness-raising activities to identify employers that could hire persons with disabilities;
- Providing advice on the most efficient ways to make accommodations in the workplace and by providing mentoring support.

The term ‘Roma’ is used in a generic sense to describe several different ethnic minority groups collectively known as Roma. These include Roma and Sinti, the Manouche, Travelers, and other groups.

Discrimination and poverty: Roma people are the most marginalized and one of the largest ethnic minority groups in Europe, with approximately six million living in the EU. According to the EU MIDIS II report of the Fundamental Rights Agency published in 2016, 80% of Roma still live below the country-specific risk of poverty line in all EU Member States. Moreover, they face discrimination in education, employment, health, and housing.

The Roma population is young, with about two-thirds of the population being under 30. Almost two-thirds (63%) of young Roma aged 16-24 are not in employment, education or training. Young Roma continue facing difficulties in accessing training and apprenticeship programmes due to common aspects of Roma social exclusion, including substandard education and direct or indirect discrimination on the labour market, coupled with decades of negative public perception and negative stereotypes which are the consequences of antigypsyism.

These difficulties also apply to the Youth Guarantee. In Spain, for example, young Roma have difficulties registering for the scheme, as very few of the most vulnerable are being reached. Roma women are especially excluded from education and employment opportunities.

Support needed:

Continued education and training: Efforts should be made to ensure young Roma can have access to enrollment in formal education or training programs which lead to a recognised qualification. Moreover, a person-centred approach should be implemented to help address gaps in education for Roma. Achieving at least basic skills and digital skills should be a priority.

Train employment officers and employers to fight antigypsyism: There is a need to train public employment services as well as potential employers on historical and current antigypsyism to counter discrimination during the recruitment process.

Improve cooperation between young Roma and public employment services: Governments should encourage closer communication between public employment services and young Roma people, with a stronger focus on encouraging more young Roma people to use their services. Funding can also be allocated to outreach to young Roma and for data mapping to provide clearer information on local communities.

Improve outreach by hiring Roma mediators as social workers or employees of local public services: Roma mediators can assist in outreach to young Roma and help to make registration for the Youth Guarantee more accessible, ensuring that no young Roma is forgotten by services.

Take an integrated approach: Programmes should be created to directly fight youth unemployment with a multi-sector approach. For example, it would be important to provide more substantial support for accommodation and commuting costs, as most employers cannot afford to do so or do not want to reimburse their employees for the cost of their commute.

Partnerships: Representatives of Roma, and organisations representing Roma, should be involved in the design and implementation of Youth Guarantee schemes in order to ensure that training and employment opportunities are inclusive. Moreover, civil society organisations and education services can often more easily reach out to Roma and other marginalized groups than public employment services. Dedicated funding is needed for capacity building to support such partners.

Take into account further barriers: When implementing initiatives such as the Youth Guarantee, it is crucial not to forget additional obstacles that Roma youth face. These include lack of know-how in dealing with state institutions and bureaucracies; not understanding or claiming one’s rights; lack of infrastructure in Roma communities (inadequate housing, utilities, transport); living in rural areas with fewer services and opportunities; lack of literacy skills and / or identification papers.

European Commission (2020) Roma integration in the EU
European Commission (2020) Roma integration in the EU
EU Agency for Fundamental Rights (2016) Second European Union Minorities and Discrimination Survey Roma, Monograph Series
EU Agency for Fundamental Rights (2018) Transition from education to employment of young Roma in nine EU Member-States
Young third-country nationals face multiple barriers in accessing the labour market in addition to those obstacles already faced by young people in general. 

**Delayed access to employment and training for asylum seekers:** Firstly, because of their status, many asylum seekers have delayed access to vocational training, which reduces opportunities for employability. 

**Refugees face numerous barriers from language to administration:** Even after acquiring protection status, many refugees face further difficulties:
- Accessing vocational training might require language levels which do not match the preparation provided by integration schemes.
- Administrative procedures can be a barrier as required documentation can be hard to obtain and involved delays and long waiting periods.
- A lack of information often means there are no measures to inform beneficiaries of international protection about opportunities such as the Youth Guarantee.

**Support needed:**

**Ensure inclusion of young people regardless of their residence status:** The Youth Guarantee should be an instrument to provide opportunities to those who cannot apply for other programmes. To achieve this, the Youth Guarantee should favour support based on the need of the applicant and avoid a target-based approach, which identifies eligibility on the basis of residence status. Therefore, Youth Guarantee rules at EU level and Member State levels should not exclude applicants on the basis of their residence status, and should make sure that all NEETs, irrespective of status, can be eligible for vocational training as a complement to their education.

**Provide additional language support:** To ensure that language barriers are overcome, programmes implemented through the Youth Guarantee should provide additional language support for young refugees and migrants.

**Improve the targeting and outreach to young refugees and migrants:** Considering the higher proportion of third-country nationals who are NEET, and delays in accessing the labour market due to administrative and legal processes, it is important that Youth Guarantee schemes target young refugees and migrants, including those who are in the 25-29 age bracket. Outreach should be improved by targeting accommodation centres with information to ensure that all refugees are made aware of opportunities from the Youth Guarantee. Measures should also be adopted to make Youth Guarantee schemes inclusive for second- and third-generation migrants who are often over-represented in unemployment statistics.

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28 The multiple barriers in accessing employment and vocational training are illustrated, with examples from a number of member states, in **Wolfhardt, Conte and Huddleston** (2019), *The European benchmark for refugee integration: a comparative analysis of the national integration evaluation mechanism in 14 EU countries*, Migrant project, Migration Policy Group.

32 PICUM (2016) *Hear our voices: Undocumented children and young people share their stories*

33 PICUM (2018) *Manual on regularisations for children, young people and families*

36 Positive examples exist in a number of European countries on ensuring access to internships and apprenticeships to undocumented children. A circular from the French ministry for National Education entitles all children from the age of 15, regardless of their residence status, to participate in internships and apprenticeships. Internship contracts are considered as contracts of employment, so students must seek authorisation to work and to undertake an internship, which is provided for by the law. The same circular guarantees access to non-compulsory education from age 16 to 18.