



ANNUAL SUSTAINABLE GROWTH STRATEGY 2022

SOCIAL PARTNERS' CONSULTATIONS

EMPLOYERS' VIEWS

13 October 2021

1. Economic and social context

General analysis

The EU economy has undergone the deepest fall in economic output since the Great Depression due to the Covid-19 pandemic, with the impact even more severe than in other large economies. In particular, the EU economy fell by 6.3% in 2020, compared to 3.5% in the US and an increase of 2.3 % in China.

The EU-27 unemployment rate at 6.9% (July 2021) remains still above the 6.5% pre-crisis level, corresponding to almost 2 million more unemployed than at the start of the pandemic. The impact of the worsened economic situation on the labour market has been cushioned by emergency measures such as short-term work schemes (STWSs) and other job retention measures (with an important support from SURE and REACT-EU). There were some 5% of all jobs dependent on government support at the end of 2020. The European economy has been recovering at a rapid pace in the last months; it is unclear whether this pace can be sustained. Many companies are struggling to find people with appropriate skills. If left unaddressed, labour market shortages can undermine growth prospects. Additionally, companies undergo structural changes/have started restructuring processes that further influence labour market and result in increased mobility. These profound transformations are likely to be further intensified by green and digital transitions.

According to the BusinessEurope Summer 2021 Economic Outlook the EU economy is picking up strongly, but the path back towards a full recovery after the Covid-19 induced recession will be long and fraught with downside risks. The EU27 economy is expected to grow by 4.4% in 2021, followed by a 4.6% growth in 2022¹. However, the recovery will be uneven between Member States depending on their economic structures, the impact of the crisis and policy choices.

Despite the cushioning effect provided by short-time work schemes (STWSs), the Covid-19 crisis has led to a significant increase of inactivity levels across the EU. Increasing employment participation of the inactive working age population is one of the key challenges ahead to improve the match between jobs and skills. The STWS should be phased out gradually and replaced by employment policy measures and financial incentives supporting viable enterprises to create jobs and jobseekers to participate in employment.

¹ BusinessEurope Summer Economic Outlook 2021 (June 2021).

Specific issues

We acknowledge, as highlighted in the Commission's issues paper, that likely changes in the structure of employment will call for appropriate policy interventions to accompany necessary transitions. Such policy interventions include: job-to-job transitions, support for mobility within companies/between companies/across sectors as well as reskilling and upskilling initiatives.

We agree that inclusive and sustainable recovery needs to be ensured and supported. It has to support necessary structural changes as well as embrace two powerful game changes, digital and green transitions. The two transitions redefine not only the world of work, but also the way we live.

Digital transformation mainly means equipping workers with the right skills to effectively use ICTs tools for work purposes, but also for meaningful participation in society. People of all ages are concerned by this necessity, however a different effort may be required to attract them to digital training. European citizens are too far behind on digital skills, which is a concern as labour market shortages are highest in the IT sector and IT-related occupations. Beyond efforts to improve digital skills in Europe, migration from third countries and EU mobility are part of the solution for Europe to succeed in its digital transition. On average 57% of the EU citizens have only basic digital skills and this greatly diverges across Member States (70% versus 29% in Denmark and Bulgaria, respectively). The result is much worse among those aged over 65.

Green transition impacts the labour market in a very complex way: the net employment effect is expected to be neutral or slightly positive. However, greening of economy will bring job creation, job substitution, job destruction and job redefinition. All these processes are interdependent and need to be analysed jointly to address their aggregated labour market impact. Green transition requires rethinking policies for clean energy supply and carbon storage across the economy, industry, production and consumption, large-scale infrastructure, transport, food and agriculture, construction as well as supportive taxation, appropriate employment policy measures and social benefits.

It is clear that there will be significant costs related to these transitions, and these costs need to be shared between enterprises, workers, consumers, and citizens to adapt as quickly as possible to new ways of working and living. Bringing to markets innovative and low-carbon new products/services will in particular require a strong focus on improving training provision for adults. Education and training systems need to adapt rapidly and effectively to new competence requirements.

The new EU headline targets by 2030 adopted at the Porto summit - ensuring that at least 78% aged 20 to 64 are in employment, at least 60% of all adults should participate in training every year and that the number of people at risk of poverty or social exclusion should be reduced by at least 15 million, including at least 5 million children – require cooperation of all stakeholders. The “employment goal” calls for favourable conditions for economic growth and job creation as well as effective job-to-job transitions. The “training goal” calls for reskilling/upskilling opportunities for all, including training for digital skills, and the necessary investments and structural reforms to improve training provision, notably through training funds. Regular analysis of labour market trends and guidance are important support measures for both “employment and training” goals as they help to choose the right training options that lead to sustainable employment. Work is the most efficient way out of poverty, therefore reaching the employment goal will naturally reduce the number of those threatened by poverty, benefitting households and eventually children from these households.

2. European Semester 2021 and the National Recovery and Resilience Plans

The European Semester was temporarily adapted in 2020 to be aligned with the Recovery and Resilience Facility. The proposed economic strategy was based on four pillars: environmental sustainability and the green transition, productivity and digital transition, fairness and macroeconomic stability. These pillars were to be guiding principles in drafting national recovery and resilience plans (NRRPs) as well as designing and implementing necessary reforms.

The Commission rightly indicates that, despite a temporary adaptation of the European Semester process in 2020, it continues to contribute to carrying in necessary reforms. At the same time, employers regret that the focus on reforms implementation in the national plans is insufficient. Additionally, in many cases, social partners have not been appropriately consulted in the design of these plans. It is essential that their role is strengthened in the implementation of the national recovery plans.

We agree that continuity and commitment to the required reforms should be underlying principle for the European Semester process. From this perspective, the new EU headline targets by 2030 are goals that need to be achieved through better coordinated reforms at the national level. The role of DG REFORM in this respect is important. Also, the CSR 2019 and 2020 remain relevant and continue to be essential reforms' direction pointers.

The national recovery and resilience plans (NRRPs) and available funding are important commitments and tools to speed up the national reform programmes implementation. Additionally, the reforms should prepare grounds for embracing digital and green transitions. Paradoxically, the Covid-19 pandemic has created a situation of a creative disruption that has triggered and accelerated some changes, for example digitalisation. This is a unique opportunity to implement profound reforms building up the performance of labour markets and social systems, making good use of frontrunner countries' experiences in terms of reforms to feed into a genuine process of result-oriented mutual learning between the Member States.

We welcome that the currently 22 endorsed National Recovery and Resilience Plans include a strong employment, skills and social dimension. Employers broadly welcome measures aiming to: strengthen the effectiveness of active labour market policies and the capacity and cooperation of public and private employment services in line with the Commission Recommendation EASE to support creation of sustainable jobs and smooth labour market transitions; improve the provision of education and training to prepare workers for fast-changing labour markets by equipping them with the required skills; reform national social protection systems, especially pensions reforms, well-targeted in-work benefits, improving access to services to all professionally active, and improved provision of childcare and long term care paying attention to the fiscal position of Member States. These reforms should be continued in the countries that have already started implementing them and urgently initiated in those that have not yet made the necessary steps.

3. Role of social partners in promoting sustainable and inclusive growth

We welcome return to traditional way of consulting social partners prior to the ASGS publication.

We acknowledge that the Commission has engaged in an intensive dialogue with the national authorities around the NRRPs and has encouraged Member States to engage in the dialogue with social partners.

At the same time European cross-industry employers deplore that employers' organisations across Europe have not been properly involved. Over 70% of BusinessEurope members consider that their involvement in the design of their countries' national recovery and resilience

plans was somewhat insufficient to even extremely limited. The poor or inexistent involvement of SME social partners in the design of national plans was also confirmed by the SMEUnited members active in the SMILES project². Similarly, SGI Europe EU funded project “SGIs in the European Semester” also revealed a poor level of involvement in the design of the NRRPs. It was also the case in some Member States with the tradition of a well-established social dialogue. Many BusinessEurope members (47%) feel that their countries’ national recovery and resilience plans lack ambition or commitment regarding reforms. They also indicate that the link between the 2019 and 2020 Country-Specific Recommendations and the national recovery and resilient plans is not sufficient. More than half of the federations consider that their countries’ national recovery and resilience plans put insufficient focus on business competitiveness, particularly research, development and innovation, and productivity. Most SMEUnited members also regret the lack of ambition concerning the simplification of SMEs business environment and their need to adapt to the twin transitions. While SGI Europe members welcomed the reinforced focus of the NRRPs on investment in infrastructures, they also regret a lack of focus on the accessibility and delivery of essential services.

On a positive note, the majority of our member federations believe their countries’ national recovery and resilience plans will have at least a positive impact on long-term growth and job creation, but only 11% of member federations consider that this impact will be either large or very large. This proves that the planned investments may not be the most ambitious and forward-looking ones.

Meaningful and timely consultations with social partners are crucial for accuracy of reforms design as well as their effective implementation, taking into account the key role collective bargaining has in regulating the labour and training markets. Regular dialogue with social partners is even more important in the situation when tailored approaches are necessary and there are significant differences between regions, sectors and even enterprises from the same sector. The dialogue is even more important in the situation when integrated services, for example to support job-to-job transitions, require multi-stakeholder partnerships involving social services, public and private employment services (PES and PrES).

The Commission should step up its actions to improve social partner involvement in the implementation of NRRPs, along the lines of annexes to the Council Implementing Decisions approving the NRRPs. We are also looking forward to the renewed framework of the EU economic governance planned for 2023 and hope it will strengthen the involvement of social partners in this process. European cross-industry employers also support the view that it is now important for the European Commission to propose appropriate arrangements for the return to a fully-fledged European Semester process as soon as possible.

In its background note the Commission indicates that promoting social dialogue and creating the right conditions for using its full potential are common goals of the EU. We welcome this statement. However, it is very important to note that this common goal is realized in different ways across the EU as there are different traditions and practices of the social dialogue at the national level. This diversity should be preserved and supported: national social partners’ engagement has proven to be very effective throughout the Covid-19 crisis. A wide variety of social partners’ driven actions included, for example hot lines for members to advise them on emergency measures, offering guidance on health and safety at workplace or advising on introducing telework and managing distant work. Social partners have also been responsible interlocutors for national administrations, often co-designing with them such crisis-mitigation measures as short-term work schemes (STWSs).

Social partners engagement will remain crucial in driving the post-Covid recovery that needs to embrace digital and green transitions. The necessary actions and ways of social partners’ contribution will vary not only among Member States, but also across sectors and regions. Social partner autonomy must be respected. This means that they should have a full freedom to engage in those initiatives that are the most needed and meaningful in the

² “SMEs’ involvement in the European Semester (SMILES)”; more info: <https://www.smeunited.eu/smiles-project->

national/regional/sectoral contexts as well as at the company level. Any form of codification, cataloguing or “rating” of their actions is unnecessary, and is likely to be counterproductive.

Social partners have, and will continue to have, an important role in assisting enterprises and workers in embracing digital and green transitions. The 2020 autonomous framework agreement on digitalization turned out to be a reference document for the Covid-pandemic times. The current work on employment and social aspects of greening of economy is another example of a very timely initiatives that is already taken down to the national level and used as it fits national partners. Respecting social partner autonomy and supporting social partners, where needed, is the most appropriate measure to ensure they come up with timely, tailored and relevant proposals. To this end, further capacity building opportunities for national social partners from countries where social dialogue structures are weak is necessary, and progress needs to be made to better use the ESF to this effect.

We welcome the fact that both EU and national level social partners are consulted regularly at key moments in the European Semester process. Nevertheless, the involvement of social partners in this process at the national level still needs to be improved in many cases. It will be especially important in the current cycle of the European Semester to ensure timely and meaningful consultation with national social partners while drafting Country Reports and Country Specific Recommendations. National social partners indicate that often during the Covid-crisis national administrations adopted certain emergency measures at such a speed that excluded substantial involvement of social partners. This cannot become a regular practice and the moment of returning to a regular European Semester process is a good moment to recall good practice of engaging social partners in a meaningful way.

The implementation of Country Specific Recommendations will hopefully be strengthened by corresponding actions from national recovery plans. In this endeavour, closer involvement of social partners can make the difference. Their timely and meaningful involvement at EU and national levels is key to improve engagement in the design of policies/reforms. Social dialogue can be a driving force for successful and fair policy-making by bringing forward effective solutions, and mirror the ongoing policy changes and reforms in collective bargaining, where appropriate. This is why we are proposing setting up two new Advisory Committees: on Employment and on Social Protection. Such Committees would strengthen the coordination of national policies on employment and social protection by serving as a platform for a direct contact between national social partners, national governments and the European Commission.

In conclusion, the greatest emphasis should be put on implementing the reforms. The EU Heads of State explicitly decided to establish the Recovery and Resilience Facility with unprecedented additional funding to the EU and Member States to accelerate investment and reforms and ensure the positive synergies between the two. The recovery is an opportunity that should not be missed to implement reforms, overcoming negative inertia when national discussions drag on for years with little or no satisfactory results.

4. Main challenges and opportunities in the employment and social fields

Entering the post-pandemic reality brings many challenges. These include telework, effective job-to-job transitions, dynamizing labour markets and increasing productivity as well as activating the inactive and improving employment rate across the EU-27.

➤ *Telework: how to embrace changes for the benefit of workers and employers?*

Before the pandemic only a relatively small number of workers was working from home, most often occasionally. According to Eurofound and ILO, the incidence of regular or occasional teleworking (home-based telework and mobile telework combined) varied across the EU from 30% or over in Denmark, the Netherlands and Sweden to 10% or less in the Czech Republic, Greece, Italy and Poland. In the USA up to 20% of the workforce was regularly or occasionally

working from home or another location, 16% in Japan and just 1,6% in Argentina³. The year 2020 has brought sudden and profound changes to the world of work, and the global economy more generally. On 11 March 2020 the WHO announced that the new coronavirus outbreak is a pandemic and urged the governments to introduce appropriate measures, among them nationwide lockdowns in many EU countries.

It is important to note the difference between “forced” and unplanned telework during the Covid-19 crisis and that was introduced overnight to those workers who have already used telework on regular basis (50% of those moving to telework due to pandemics) and to the “telework novices” (25% of workers who moved to telework due to the pandemics). It has also been a huge organisation effort on the part of companies to adopt their ways of operation, for example adapt their internal procedures related to data protection or equipping employees in the necessary ITCs tools and “speed” train them for their effective use.

Telework is likely be more often used after the pandemic. Increasing use of telework will be supported by digitalization, advanced communications and cloud technologies. New questions on organizing telework, share of responsibilities and other related issues already appear. It is very important to note that the still current “forced” telework practice cannot be treated as the basis for regulating “normal” and voluntary telework benefitting both employers and workers. When the sanitary crisis will be mitigated, well-balanced arrangements for voluntary telework will be what matters once again.

European employers are willing to negotiate the future framework conditions for voluntary telework with ETUC by reviewing together our 2002 autonomous agreement on this issue and update it in light of the lessons learnt from the Covid crisis.

- *Appropriate training opportunities: preparing employees to benefit from digital transition*

Enterprises should be better supported in organising and financing upskilling/reskilling opportunities for their employees. As recognised in the recent tripartite opinion of the Advisory Committee on Vocational Training on an EU initiative on Individual Learning Accounts and strengthening training provision in Europe, “*continuous dialogue between the workforce and their management at company level has an important role to facilitate the choice of training activities, as does collective bargaining at sectoral and/or cross-industry levels, including the widespread practice of training funds across Europe. More visibility and recognition should be given in EU skills policy debates to the training funds across Europe, which contribute to mobility and fair transitions*”.

Progress is also needed to better train digital skills across Europe. European employers duly noted the Commission’s intention to come up in 2022 with a proposal for a Council Recommendation on improving the provision of digital skills. We will aim to inform the Commission about employers’ needs, and how to improve the training of digital skills in the best possible way. This initiative is also crucial to reduce the risk of a digital divide, especially in case of such groups as the low-skilled or the elderly. For representatives of these groups, it is necessary to propose tailor-made approach, potentially with a stronger outreach component.

- *Supporting effective job-to-job transitions*

We agree with the Commission assessment that in the recovery phase not all jobs will be reinstated and that improving the support to facilitate labour market transitions is of crucial importance. Structural changes are taking place at the sectoral and regional levels, and companies undergo restructuring processes as a result of, for example, changing products and services markets, and the related adaptation of working methods.

³ ILO (2020), *Teleworking in the COVID-19 pandemic and beyond A practical guide*, Geneva, p. 2.

We welcome the Commission Recommendation on EASE. It is a powerful tool to support employers to create jobs and accompany enterprises in the necessary transitions. It is very important to ensure that actions included in the National Recovery and Resilience Plans are supportive to job-to-job transitions and labour mobility in general. Social partners are well placed to guide on appropriate actions as they can bring the necessary perspective (sectoral/regional/company level).

Upskilling/reskilling opportunities are important elements of effective job-to-job transitions. They should enable employees to acquire transferrable skills required in growing sectors and/or sustainable occupations. Involving social partners in designing and implementing these measures is crucial: a good example of such an initiative are comprehensive sectoral skills strategies and the development of effective skills intelligence and forecasting tools.

➤ *Promote entrepreneurship*

As rightly mentioned in the Commission Recommendation on EASE, Member States should support start-up grants, loans and equity to promote entrepreneurship, accompanied by improved access to social protection for the self-employed. We welcome actions which would combine financial and non-financial support such as mentoring and coaching of young or underrepresented groups of entrepreneurs, re-starters and potential entrepreneurs. Entrepreneurship is one of the best ways to develop innovative approaches for the digital and green transitions and to create new jobs.

➤ *Dynamizing labour markets and increasing productivity*

In addition to the post-Covid economic downfall, many challenges have been dragged from the “pre-Covid” period due a number of underlying structural weaknesses, which are hampering the growth prospects. These include in particular low productivity growth and continued labour and skills shortages, the long-standing weaknesses in our labour markets, social protection and education and training systems.

It is important to look at developments in productivity in conjunction with developments in wages. The compensation per employee in the EU expanded at a rate close to its pre-pandemic average in the first quarter of 2021. Further wage increases are likely as a result of raising inflation, growing consumer prices and labour market shortages. Whilst employers support increasing real wages, this should be done in a way which maintains enterprises’ global competitiveness, so that they are able to continue creating jobs and hiring workers. Only then created jobs will be quality jobs or, in other words, sustainable jobs. With higher increases in wages, it is therefore even more crucial to increase Europe’s rate of long-term productivity growth. The increase of wages should be especially carefully considered in the post-Covid recovery not to hamper the productivity and to avoid additional burden on companies undergoing structural changes/restructuring.

As highlighted by the Commission in the issues paper, labour shortages remain a real issue and this is actually now limiting production and thereby economic growth. This is echoed by enterprises themselves, who are increasingly reporting difficulties in hiring workers, in particular people with the right skills. In order to bring more people to the labour market, social systems should provide incentives to work through in-work benefits. Member States should be encouraged to look into this and share their respective practices in the context of Commission’s activities in terms of national employment policies coordination. The growing structural skills mismatch on European labour markets also calls for more urgent action to reform education and training systems in line with labour market needs, making good use of the experience of some Member States which are frontrunners in this field (e.g. Austria, Estonia, and Ireland).

The high tax wedge on labour remains problematic. Over the last 10 years, the EU has made very little progress in closing the gap with other advanced economies. According to Eurostat, between 2018 and 2019 the average decrease of tax wedge on labour was less than 1 percentage points across the EU-27⁴. The average tax wedge in the EU-27 in 2019 was 39,5%. This is almost 10 percentage points higher than in the US (29,8% in 2019) and almost 7 percentage points higher than in Japan (32,7% in 2019). High tax wedge on labour not only hinders employment creation, but also does not correspond to the needs of modern labour markets and economies in general. The draft 2021 Joint Employment Report rightly observes that there is scope for shifting taxation away from labour towards other sources that have less impact on economic growth and contribute to achieving environmental goals⁵. In its recent Economic Outlook OECD also stresses the importance of reducing tax wedge on labour to support job creation.

➤ *Activating the inactive and increasing employment rate*

One of the main challenges across the EU is activating the inactive, in particular women, younger and older workers. Some progress has been made, in particular in improving employment levels of older workers (increased from 57.1% in 2017 to 58.7% in 2018) and younger workers (increased by 0.6% from 2017-2018), however this is still lower than in 2008 and the differences among the Member States persist. Ensuring that all those who are able to work are active on labour markets, will be crucial in the context of demographic change with an ageing population and low birth rates. Growth-enhancing investments in child and other care infrastructure are rightly a focus of the European Semester process for some Member States.

Activating the inactive requires new approaches and tailor-made solutions. For example, PES need to extend their offer of outreach initiatives to recruit the inactive to their activation programmes. It can be done by establishing a framework for PES cooperation with other institutions, i.e. social security organisations or NGOs active in the inclusion area, women and migrant organisations etc.

Aligning social protection schemes (i.e. introducing conditionality of social benefits) with PES activation efforts is a pre-condition of their effectiveness. Last but not least, all involved in the activation process need to concentrate on “work ability” of an individual rather than his/her incapacity or barriers to work.

Well-functioning labour markets make use of diverse employment contracts and relations. Such options as temporary employment contracts, part-time employment or self-employment are examples of forms of employment/ type of professional activity that can meet the needs of companies and workers. They enlarge the pool of potential workers by candidates from such groups as women or men with caring duties, people with disabilities, the low skilled who want to combine employment with further education or older workers often not interested in full-time work or want to be self-employed and be their “own boss”. It is also important to understand that availability of diverse forms of employment are important to encourage employers to create additional employment opportunities, keeping in mind that it is not always possible or a suitable solution for employers to create full-time indefinite duration employment opportunities. In the absence of these diverse forms of employment overall employment rate would be lower. The use of diverse employment contracts and relations is the best defined at the national level as it needs to mirror national labour market specificities as well as social dialogue practices and the fact that defining work is a national competence. Social partners have an important

⁴ Only Lithuania has experienced a more pronounced decrease in tax wedge on labour (3,43%) due to major reforms which implied significant reduction in employer’s social security contributions, higher tax burden on employees and corresponding increase of gross salaries.

⁵ European Commission (2020), *Proposal for a Joint Employment Report 2021*, p.41.

role to play to combine in the best possible way economic and labour market efficiency with social fairness.

Improving childcare provisions and long-term care provisions are powerful measures to increase female employment. Reforming existing systems, or introducing necessary measures, should be the priority. The gap between female and male employment persists in all age groups at 17.4 percentage points in full-time equivalent. Lower employment rate among women leads to lower pensions, and given the women live longer, can lead to a higher risk of old-age poverty for women. Most women share a higher burden of caring responsibilities: at the beginning of their careers they take care of their children; later they are in charge of care for dependent family members. This is why access to affordable and good quality care facilities and provisions is one of the main conditions for attracting more women to the labour market.

In the post-Covid recovery active labour market policies (ALMPs) need to become tailor-made and more personalized. The draft Joint Employment Report 2021 rightly indicates that among existing ALMPs there is room to increase targeted outreach, to improve the quality of assessment done by PES and to strengthen cooperation with employers⁶. Multi-stakeholder partnerships are the best option to address very diverse needs of those looking for a job/at the risk of losing the job and new entrants.

Special attention should be paid to young people. For many the Covid-pandemics has reduced possibilities of internships/apprenticeships and the first contacts with the real world of work important for entering the labour market. To improve professional perspectives for young people, the school-to-work transition success rate should be increased. This first experience is usually decisive for professional future: either forms a basis for successful transitions, or paves the way to fragmented careers and inactivity spells. It is important to ensure that skills of young people correspond to the labour market needs. Young people need to be supported and guided to feel responsible for their professional future. From early years, they should be encouraged to observe (local/regional) labour market and its developments to know which skills are in demand and what are employers' needs. Social partners should be involved in designing training curricula and, wherever possible, work-based learning should be an important component of education.

European employers welcome the Commission's focus on improving the prospects of young people who are not in education, training or employment (NEETs), including through the recently announced NEETs mobility programme ALMA. Helping these young people to get access to the labour market is an important investment for our economies to grow, and for the young people in question to be active and recognised in society, rather than facing the stigma social exclusion at a high cost for society.

Offering employment opportunities to young people with no professional experience and/or a drop out history is often not possible for enterprises. However, enterprises may offer apprenticeships that would help companies to enhance their productivity and address their skills needs, while also helping young people to improve their employability. The prerequisite for starting apprenticeship is a set of basic skills acquired during the initial education. Quality and effective apprenticeships are those during which at least 50% of the training time is spent in an enterprise. In line with the Council recommendation adopted on 15 March 2018, each European country should come up with a supportive policy ecosystem, including the design of fair cost-sharing arrangements between employers and public authorities, while ensuring an appropriate element of commitment of the apprentices, reflecting the benefits apprenticeship brings them (e.g. professional qualifications and in-company experience, employment opportunities). European employers look forward to the continuous necessary work to support Member States and the national social partners to make further progress on framework conditions towards effective and quality apprenticeships in all EU Member States.

⁶ European Commission (2020), *Proposal for a Joint Employment Report 2021*, p.80.