

I. Form of the international instrument or instruments

1. *Should the International Labour Conference adopt an instrument or instruments concerning a framework for quality apprenticeships?*

Yes No

Comments:

2. *If so, should the instrument or instruments take the form of:*

(a) *a Convention?*

(b) *a Recommendation?*

(c) *a Convention supplemented by a Recommendation, as two separate instruments, or as a single instrument comprising binding and non-binding provisions?*

Comments:

Preferably a Recommendation.

It is however the most important that the instrument or instruments leave enough room for national discretion, since national situations, solutions, educational systems and labour market needs vary a lot.

The Central Organisation of Finnish Trade Unions (SAK), the Finnish Confederation of Professionals (STTK) and the Confederation of Unions for Professional and Managerial Staff in Finland (Akava) would like to retain a possibility to adopt both a Convention and a Recommendation at this stage.

II. Preamble

3. *Should the Preamble of the instrument or instruments note that global youth unemployment rates continue to be high and that rapid transformations in the world of work are resulting in skills mismatches, requiring people of all ages to reskill and upskill continuously to access and remain in employment?*

Yes No

Comments:



4. *Should the Preamble of the instrument or instruments recognize that apprenticeships vary widely in different contexts and face significant challenges in many countries, perpetuating gender inequality, offering low-quality training and inadequate protection to apprentices, and deterring participation of enterprises, in particular small and medium-sized enterprises?*

Yes No

Comments:

5. *Should the Preamble of the instrument or instruments acknowledge that quality apprenticeships can constitute effective and efficient responses to current challenges and provide lifelong learning opportunities to enhance productivity, resilience, transitions and employability and meet current and future labour market needs?*

Yes No

Comments:

6. *Should the Preamble of the instrument or instruments underline that an effective and successful framework for quality apprenticeships requires apprenticeships to be well regulated, sufficiently funded, socially inclusive and free from discrimination, provides adequate remuneration and social protection coverage, recognizes qualifications and enhances employment outcomes?*

Yes No

Comments:



7. *the Preamble of the instrument or instruments recognize the particular relevance of the ILO Declaration on Fundamental Principles and Rights at Work, 1998, and the ILO Centenary Declaration for the Future of Work, 2019, for the promotion of quality apprenticeships and the effective protection of all apprentices and trainees, particularly in the light of the profound transformations in the world of work?*

Yes No

Comments:

The instrument should apply only to apprenticeships.

8. *Should the Preamble of the instrument or instruments recall the provisions of other relevant ILO instruments, particularly the Employment Policy Convention (No. 122) and Recommendation (No. 122), 1964, the Human Resources Development Convention, 1975 (No. 142), the Employment Policy (Supplementary Provisions) Recommendation, 1984 (No. 169), and the Human Resources Development Recommendation, 2004 (No. 195)?*

Yes No

Comments:

III. Definitions and scope

9. *Should the instrument or instruments include a definition of “apprenticeship”?*

If so, should the term “apprenticeship” be defined as any form of education and training, which is governed by an apprenticeship agreement, and enables a person (the “apprentice”) to acquire the competencies required to work in an occupation through structured training consisting of on-the-job learning and supplemented by off-the-job learning and leading to a recognized qualification?

Yes No

Comments:

In the definition of “apprenticeship” the definition of the EU Recommendation on a European Framework for Quality and Effective Apprenticeships should be taken into account:

“For the purposes of this Recommendation and without prejudice to national terminology, apprenticeships are understood as formal vocational education and training schemes that

- a) combine learning in education or training institutions with substantial work-based learning in companies and other workplaces,
- b) lead to nationally recognised qualifications,
- c) are based on an agreement defining the rights and obligations of the apprentice, the employer and, where appropriate, the vocational education and training institution, and



d) with the apprentice being paid or otherwise compensated for the workbased component.

10. *Should the instrument or instruments include a definition of “enterprise”?*

If so, should the term “enterprise” be defined as a business, undertaking, economic unit or organization, whether public or private?

Yes No

Comments:

Definition must be flexible.

11. *Should the instrument or instruments include a definition of “intermediary”?*

If so, should the term “intermediary” mean an individual or an entity, other than the host enterprise or educational institution, which assists in the provision, coordination or support of an apprenticeship?

Yes No

Comments:

There is no need for this kind of definition.

12. *Should the instrument or instruments include a definition of “recognition of prior learning”?*

If so, should the term “recognition of prior learning” be defined as a process of identifying, documenting, assessing and certifying a person’s competencies, acquired through formal, non-formal or informal learning, based on established qualification standards?

Yes No

Comments:

As long as every country has own, specific qualifications requirements and qualification system, it is difficult to have global definition of recognition of prior learning. In Finland, according to Act on Vocational Education and Training, it shall be the duty of the education provider to recognise the student’s prior learning insofar as it is consistent with the competence requirements or learning outcomes in the relevant qualification requirements or education requirements.



13. *Should the instrument or instruments include a definition of “traineeship”?*

If so, should the term “traineeship”, which includes internship, be defined as any form of on-the-job learning, which enables a person (the “trainee”) to acquire work experience with a view to enhancing their employability?

Yes No

There is no need for that kind of definition.

14. *Should any other terms be defined by the instrument or instruments? If so, please specify.*

Yes No

Comments:

15. *Should the instrument or instruments apply to all apprenticeships and traineeships in all enterprises and sectors of economic activity?*

Yes No

Comments:

The instrument should apply only to apprenticeships.

16. *Should the instrument, if it takes the form of a Convention, provide that Members could, after consulting with the most representative organizations of employers and workers, limit its scope of application where special problems of a substantial nature arise?*

Yes No

Comments:

IV. Regulatory framework for quality apprenticeships

17. *Should the instrument or instruments provide that Members should establish*



regulatory frameworks for quality apprenticeships through social dialogue and that the social partners should be involved in the design, implementation, monitoring and evaluation of quality apprenticeship programmes?

Yes No

Comments:

Yes, if the instrument takes the form of a recommendation. In Finland the term 'apprenticeship' is regulated by the Act on Vocational Education and Training. Apprenticeship is part of vocational education system, so there is no such term as 'apprentice program'. Apprenticeship is evaluated as part of the VET-system.

18. *Should the instrument or instruments provide that Members should establish or designate one or more authorities to regulate apprenticeships and that the social partners should be represented in these bodies?*

Yes No

Comments:

That should be a national decision.

19. *Should the instrument or instruments provide that Members should ensure that the competent regulatory authorities have clearly defined responsibilities and work in close cooperation with other authorities or institutions responsible for regulating or delivering education and training, labour inspection, social protection, occupational safety and health, and public and private employment services?*

Yes No

Comments:

See previous answer. However, Finland endorses these objectives.

20. *Should the instrument or instruments provide that Members should adopt a process for recognizing an occupation as being suitable for quality apprenticeships, taking into account:*

(a) *the competencies needed to work in that occupation?*

Yes No



Comments:

That should be a national decision. Qualification structure and qualification content are developed in close cooperation with working life to ensure that the qualifications support a flexible and efficient transition into the labour market as well as to allow for occupational development and career changes.

(b) *the appropriateness of an apprenticeship as a means of acquiring such competencies?*

Yes No

Comments:

See previous comment.

(c) *the duration of the apprenticeship required to acquire such competencies?*

Yes No

Comments:

This decision is made by vocational education provider.

This should be national level regulation.

(d) *the current and future demand for skills and employment potential in that occupation?*

Yes No

Comments:

That should be a national decision. Qualification structure and qualification content are developed in close cooperation with working life to ensure that the qualifications support a flexible and efficient transition into the labour market as well as to allow for occupational development and career changes.



(e) *any other factors? If so, please specify.*

Yes No

Comments:

21. *Should the instrument or instruments provide that Members should establish occupation-specific standards for quality apprenticeships, which provide, among others things, for:*

(a) *the minimum age for admission?*

Yes No

Comments:

Apprenticeship training is based on a written fixed-term agreement between a student and an employer (apprenticeship agreement). This contract can be concluded between a student aged 15 or older and an employer or, in a civil service employment relationship or other comparable public-sector employment relationship.

(b) *the educational qualifications or prior learning needed for admission?*

Yes No

Comments:

(c) *the ratio of apprentices to workers in the workplace?*

Yes No

Comments:

For entering into an apprenticeship agreement or a training agreement, it is required that the workplace used for the training must have the following vis-à-vis the providing of education compliant with the qualification requirements or PCDP (personal competence development plan) and consistent with the organising of competence demonstrations: (1) sufficient production and service operations; (2) the necessary tools; (3) personnel that is qualified in terms of vocational skills, training and work experience.

A workplace instructor who is sufficiently qualified in terms of vocational skills, training or work experience shall be appointed for the student. In case of an entrepreneur undergoing apprenticeship training, the workplace instructor may come from another workplace or be someone else suitable for the task.

(d) *the minimum and maximum duration of the apprenticeship?*

Yes x No

Comments:

(e) *the extent to which the normal duration of the apprenticeship could be reduced on the basis of any prior learning or progress made during the apprenticeship?*

X Yes No

Comments:

All prior learning or progress should be taken into account when considering the content and duration of the apprenticeship. It shall be the duty of the education provider to recognise the student's prior learning insofar as it is consistent with the competence requirements or learning outcomes in the relevant qualification requirements or education requirements.

(f) *learning outcomes and curricula?*

X Yes No

Comments:



(g) *the ratio of off-the-job learning to on-the-job learning?*

Yes x No

Comments:

This varies depending on the Personal competence development plan and it should be flexible. Apprenticeship training mainly comprises learning while performing practical work assignments in the workplace, complemented as necessary with achievement of competence in other learning environments.



(h) *the conditions under which apprentices should be released from on-the-job learning to undertake off-the-job learning?*

Yes x No

Comments:

See previous answer.



(i) *vocational guidance and career counselling?*

Yes No

Comments:

See previous.

(j) *the mentoring and supervision of apprentices?*

Yes No

Comments:

See previous (not occupation-specific).

(k) *the procedures for assessing and certifying the competencies acquired?*

Yes No

Comments:

See previous (not occupation-specific).

(l) *the qualification(s) acquired on successful completion of the apprenticeship?*

Yes No

Comments:

Skills and competences can concern also only a part of a qualification or smaller part of that.

(m) *any other elements? If so, please specify.*

Yes No

Comments:



for quality apprenticeships through national laws and regulations, collective agreements, decisions of competent regulatory bodies or in any other manner consistent with national practice?

Yes No

Comments:

23. *Should the instrument or instruments provide that Members should take measures to ensure that there is a fair and transparent process for transferring an apprentice from one enterprise to another when this is considered necessary or desirable for the completion of the apprentice's training?*

Yes No

Comments:

24. *Should the instrument or instruments provide that Members should take appropriate measures to ensure that apprentices:*

(a) *are adequately remunerated?*

Yes No

Comments:

(b) *are not required to work hours that exceed specified limits?*

Yes No

Comments:

(c) *are entitled to holidays with pay?*

Yes No

Comments:



(d) *are entitled to paid leave for absence due to illness or accident?*

Yes No

Comments:

(e) *are afforded the same protection and receive the same training as others in the workplace in respect of discrimination and violence and harassment?*

Yes No

Comments:

(f) *are afforded the same protection and receive the same training as others in the workplace in respect of occupational safety and health?*

Yes No

Comments:

(g) *are entitled to compensation for work-related injuries?*

Yes No

Comments:

(h) *are eligible for any other benefits? If so, please specify.*

Yes No

Comments:



25. *Should the instrument or instruments provide that Members should prescribe conditions under which:*

(a) *enterprises may offer apprenticeships?*

Yes x No

(b) *educational and training institutions may provide off-the-job training?*

Yes x No

(c) *intermediaries may assist in the provision, coordination or support of apprenticeships?*

Yes x No

Comments:

All this should be left on national level.

26. *Should the instrument or instruments provide that Members should take measures to continuously develop and strengthen the capacity of government agencies and the social partners to respond to challenges affecting quality apprenticeships, such as technological changes and the emergence of new forms of work arrangements?*

X Yes No

Comments:

Yes, if the instrument takes the form of a recommendation.

27. *Should the instrument or instruments provide that Members should take measures to ensure that apprenticeship systems and programmes are regularly monitored and evaluated?*

x Yes No

Comments:

In Finland, apprenticeship is integrated into the vocational education system, so the monitoring and evaluation is part of evaluating the education system, not only apprenticeship.

V. Apprenticeship agreement

28. *Should the instrument or instruments provide that Members should ensure that all apprenticeships are governed by a written agreement which is concluded between*



an apprentice and an enterprise or an intermediary, and which, if so permitted by national laws and regulations, may also be signed by a third party, such as an educational or training institution?

Yes No

Comments:

29. *Should the instrument or instruments provide that Members should ensure that an apprenticeship agreement:*

(a) *clearly identifies the parties' respective roles, rights and obligations, with reference to the relevant occupation-specific standards?*

Yes No

Comments:

(b) *contains provisions governing matters such as apprenticeship duration, remuneration, working hours, leave entitlements, occupational safety and health, social security, dispute resolution and the termination of the apprenticeship agreement?*

Yes No

Comments:

In Finland this is regulated by the Act on Vocational
Education and Training.

(c) *is registered under conditions established by the competent authority?*

Yes No

Comments:

This is regulated by the Act on Vocational Education and Training.



(d) *is signed on the apprentice's behalf by a parent, guardian or legal representative, where the apprentice is a minor, as may be required by national laws and regulations?*

Yes No

Comments:

15 years old persons can sign their employment contract by themselves.

(e) *contains any other elements? If so, please specify.*

Yes No

Comments:

30. *Should the instrument or instruments provide that Members should develop a model apprenticeship agreement to facilitate consistency, uniformity and compliance?*

Yes No

Comments:

National regulation, if needed.

VI. Equality and diversity in quality apprenticeships

31. *Should the instrument or instruments provide that Members should take measures to promote gender equality in apprenticeships?*

Yes No

Comments:

32. *Should the instrument or instruments provide that Members should take measures to*



promote equality, diversity and social inclusion in apprenticeships, special account being taken of the situation and needs of:

(a) *persons with disabilities?*

Yes No

Comments:

(b) *persons in the informal economy?*

Yes No

Comments:

Yes, if the instrument takes the form of a recommendation.

(c) *older persons?*

Yes No

Comments:

(d) *long-term unemployed persons?*

Yes No

Comments:

(e) *persons belonging to disadvantaged minorities?*

Yes No

Comments:

(f) *migrants, refugees, internally and forcibly displaced persons, and other persons in vulnerable situations?*

Yes No

Comments:



Depending on work permit.

(g) *any other persons? If so, please specify.*

Yes *No*

Comments:

-

33. *Should the instrument or instruments provide that Members should take measures to promote access to formal education and training, including quality apprenticeships, especially for persons in the informal economy, through recognition of prior learning?*

Yes *No*

Comments:

Yes, if the instrument takes the form of a recommendation.

VII. Promotion of quality apprenticeships and international cooperation

34. *Should the instrument or instruments provide that Members should take measures to create an enabling environment for promoting quality apprenticeships, including by:*

(a) *developing and implementing strategies, setting national goals and allocating adequate resources for quality apprenticeships?*

Yes *No*

Comments:

Should be left on national discretion.



(b) *mainstreaming quality apprenticeships in national development strategies and in employment, education and lifelong learning policies?*

Yes No

Comments:

In Finland apprenticeships are part of vocational education system.

(c) *providing incentives, such as cost-sharing, tax exemptions or subsidies for social security contributions, to enterprises, especially small and medium-sized enterprises?*

Yes No

Comments:

In Finland, if an employer is estimated to incur costs by providing apprenticeship training, the education provider shall pay the employer training compensation as agreed in the agreement concerning apprenticeship training signed by the education provider and the employer. How training compensation is determined, may be provided for in more detail by Government Decree.

(d) *encouraging intermediaries, including through financial support, to participate in the provision, coordination and support of apprenticeships?*

Yes No

Comments:

In Finland term intermediaries is unknown.

(e) *undertaking awareness-raising activities and promotional campaigns at regular intervals to improve the image and attractiveness of apprenticeships?*

Yes No

Comments:

As part of the vocational education system, yes.

(f) *establishing pre-apprenticeship programmes?*

Yes No

Comments:

In Finland, there is a training agreement for that purpose.



(g) *facilitating access to further vocational and higher education opportunities for apprentices?*

Yes No

Comments:

(h) *using new technologies and innovative methods to improve effectiveness and efficiency in delivering and managing quality apprenticeships?*

Yes No

Comments:

(i) *adopting any other measures? If so, please specify.*

Yes No

Comments:

35. *Should the instrument or instruments provide that Members should take measures to enhance international cooperation and exchange of good practices, in all aspects of quality apprenticeships, including through offering expanded learning opportunities to apprentices and recognizing competencies acquired through apprenticeship programmes or prior learning?*

Yes No

Comments:



36. *Should the instrument or instruments provide that, with a view to promoting quality apprenticeships in the informal economy, Members should:*

(a) *strengthen the capacity of micro and small economic units by facilitating access to business development and financial services, improving occupational safety and health conditions, and enhancing the technical, pedagogical and entrepreneurial competencies of master craftspersons?*

X Yes No

Comments:

Yes, if the instrument takes the form of a recommendation.

(b) *ensure that apprentices have access to off-the-job learning and may complement their on-the-job learning through intermediaries or in other enterprises?*

X Yes No

Comments:

Yes, if the instrument takes the form of a recommendation.

(c) *strengthen the capacity of associations of micro and small economic units, including through financial support, to perform the role of regulators and quality assurance bodies?*

X Yes No

Comments:

Yes, if the instrument takes the form of a recommendation.



VIII. Traineeships

37. *Should the instrument or instruments provide that Members should take measures, in accordance with national laws and regulations, to ensure that trainees:*

(a) *have a written traineeship agreement concluded between themselves and a host enterprise?*

Yes No

Comments:

The instrument should apply only to apprenticeships.

(b) *are adequately remunerated?*

Yes No

Comments:

(c) *are not required to work hours that exceed specified limits?*

Yes No

Comments:

(d) *are entitled to holidays with pay?*

Yes No

Comments:



(e) are entitled to paid leave of absence for illness or accident?

Yes No

Comments:

(f) are afforded the same protection and receive the same training as others in the workplace in respect of discrimination and violence and harassment?

Yes No

Comments:

(g) are afforded the same protection and receive the same training as others in the workplace in respect of occupational safety and health?

Yes No

Comments:

(h) are entitled to compensation for work-related injuries?

Yes No

Comments:

(i) are eligible for any other benefits? If so, please specify.

Yes No

Comments:



