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Dual training in Europe: a policy fad or a policy turn?

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Summary
Since the start of the global financial crisis Europe has experienced a new enthusiasm for dual vocational education and training (VET). The EU itself has actively promoted the benefits of dual VET to its members, offering financial and organisational support for the introduction of apprenticeships into the formal educational systems. However, while dual VET is widely considered to be a valuable tool for easing the transition into the labour market for young people, it is also a form of skill formation that requires a lot of coordination not only between the schools and firms that carry out the training, but also among the firms themselves and between employer and employee organisations. In this introduction we argue that whereas the EU has been successful in encouraging establishment of dual VET in all its member countries, its implementation has been very uneven. This is due in part to the pre-existing differences in the underlying organisational structures, but also to the ongoing demographic, technological, and institutional changes – some caused by European integration itself – which weaken firms’ incentives to train.

Résumé
Depuis le début de la crise financière mondiale, l’Europe a connu un nouvel enthousiasme pour l’enseignement et la formation professionnels (EFP) en alternance. L’UE elle-même a activement soutenu les avantages de l’EFP en alternance auprès de ses membres, en offrant un appui financier et organisationnel à l’introduction de l’apprentissage dans les systèmes éducatifs officiels. Toutefois, si l’EFP en alternance est largement considéré comme un outil précieux pour faciliter la transition vers le marché du travail des jeunes, c’est aussi une forme de formation professionnelle qui exige une grande coordination non seulement entre les écoles et les entreprises qui dispensent la formation, mais aussi entre les entreprises elles-mêmes et entre organisations patronales et syndicales. Dans cette introduction, les auteurs soutiennent que si l’UE a réussi à encourager l’établissement de l’EFP en alternance dans tous les pays européens, sa mise en œuvre a été très inégal. Cela est dû en partie...
aux différences préexistantes dans les structures organisationnelles sous-jacentes, mais aussi aux changements démographiques, technologiques et institutionnels en cours - certains causés par l'intégration européenne elle-même - qui fragilisent la motivation des entreprises pour la formation.

Zusammenfassung

Keywords
EU education policy, collective skill formation, apprenticeships, dual VET, labour market transition, trade unions

Introduction
Since the start of the global financial crisis, and most clearly since the explosion of the public debt crises in 2011–2013, Europe has experienced a revival of enthusiasm for dual vocational education and training (VET). Dual VET refers to a system in which a part of education, usually at the upper secondary level, takes place in private companies via long-term apprenticeships. Traditionally a feature of training for crafts and industrial occupations in a handful of northern European countries, over the past decade it has become part of the standard repertoire of EU policy recommendations for a wide array of challenges plaguing its Member States: from reducing skill mismatches and youth unemployment to improving Europe’s global industrial competitiveness and facilitating social cohesion and even integration of migrants (European Commission, 2012, 2015, 2016). Suggestions for the reform of VET policy, often explicitly focused on apprenticeships, have also become common in the country-specific recommendations within the European Semester.¹

The political support for the expansion of apprenticeships in Europe had been mobilised in the 2013 declaration of the Council of the European Union for a ‘European Alliance for Apprenticeships’, in which the Member States pledged, *inter alia*, to ‘Undertake VET system reforms [ . . . ] by introducing an apprenticeship pathway or improving existing schemes [ . . . ]’ as well as to ‘Envisage strategic use of EU funds, including the European Structural and Investment Funds and the Erasmus+ programme, to support the establishment of effective apprenticeship schemes’ (Council of the European Union, 2013). In the same year, the Alliance was formally launched with support of the European social partners (ETUC, BusinessEurope, UEAPME and CEEP). The political commitment has since been reinforced by regulatory formalisation of apprenticeships, albeit in a soft form, with the Council of the EU Recommendation on a European framework for Quality and Effective Apprenticeships (Council of the European Union, 2018).

Between 2010 and 2018, dual training as a formal educational pathway had been introduced in a number of EU Member States where such ‘official’ apprenticeships did not exist before: Bulgaria, Hungary (at post-secondary level), Italy, Slovakia, Spain, Romania, Poland, and Sweden. Through the European structural and investment funds, as well through Erasmus+ and Youth Guarantee schemes, the EU financially supported most of these initiatives, and promoted partnerships between the German and Austrian ministries of education and other EU Member States to develop dual training.²

There are many reasons behind this renaissance of dual training. Plenty of comparative studies show that countries with dual training have lower rates of youth unemployment, a problem that struck many European countries with particular urgency in the aftermath of the global financial crisis (e.g. Cedefop, 2012; Eichhorst, 2015).³ Fast-paced technological change makes it more difficult for the schools to keep up with the demands of the labour market, and the possibility of involving the business sector in training promises not only to ensure the supply of workplace-ready skills, but also to do so in a way that would take some pressure off already shaky public finances.

This emphasis on improving the match between workforce skills and labour market demands is not new. The promotion of work-based learning, for instance in the context of lifelong learning, has long been part of the Lisbon agenda to steer Europe towards a ‘knowledge economy’. However, the promotion of work-based learning as a formal educational option brings important novelties that point to a broader shift in Europe’s approach to education.

The first remarkable change is the decline in optimism about education in general and higher education in particular. Whereas the Lisbon agenda included general calls for increasing investment in education⁴, and the Europe 2020 strategy still urged a 40 per cent target for enrolment in higher education, the new European skills agenda emphasises efficiency and returns on education. Over-qualification has become a concern (European Commission, 2016) and some country-

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² See for instance the overview of the projects conducted by the German Federal Institute for Vocational Training (Bundesinstitut für Berufsbildung), see: https://www.bibb.de/en/25377.php (accessed 2 December 2019). Joint action plans for young people were also launched by the Commission to reprogramme structural funds to specific countries in order to channel financing for establishment of dual training programmes.

³ Within-country studies show a less clear-cut benefit of dual training over other forms of education, and even if dual training can smooth labour market transition in the first few years, the effects fade quickly, and may even be reversed later in working life (Brunello and Rocco, 2017; Hanushek et al., 2017).

⁴ By calling, *inter alia*, for ‘substantial annual increases in per capita investments in human resources’ (European Council, 2000).
specific recommendations now accompany exhortations to promote enrolment in vocational programmes by warnings that there are too many tertiary graduates working in occupations that do not require academic degrees.\footnote{See for example the country-specific recommendations in 2018 to Cyprus, as well as those in 2013 to Italy and Romania, and in 2016 to Spain.}

The second is the emphasis on the involvement of the business sector, both in defining educational needs, as well as in delivering training. Scholars have long pointed out that successful implementation of dual vocational training requires a complex institutional structure, involving coordination between educational institutions, businesses, and workers’ representatives, as well as among the businesses themselves (Busemeyer and Trampusch, 2012; Hall and Soskice, 2001). Across Europe, the preconditions for such institutional coordination differ widely, with some countries having very little institutional capacity in general, and others having developed national-level coordination but with little capacity at the company or sectoral levels.

The attempt to promote dual training from the EU level across these varied institutional landscapes therefore raises urgent questions about institutional adaptability and change and about the role of external factors in promoting such change. These questions are all the more fascinating in light of theories of European integration that point to the EU’s bias towards ‘negative integration’, i.e., the focus on removing obstacles to free operation of markets rather than working towards joint provision of public goods. The promotion of dual training, as a form of training that demands high levels of institutional coordination between businesses, unions, schools and state institutions, therefore represents an important counter-example.

This policy turn is also not without dangers. While apprenticeships have been promoted as a solution for everything from flagging competitiveness to social exclusion, in reality there can be significant trade-offs between the two. Countries with dual systems have long been maligned for low levels of social mobility (Powell and Solga, 2011; Protsch and Solga, 2016), and in some countries social inclusion has been cited explicitly as a reason against apprenticeships (see Nyen and Tønder, 2020). More recently, efforts to raise the levels of skills in industry have led training providers to focus on attracting high-achieving students from academic tracks, with the result that students from disadvantaged socio-economic backgrounds often fail to secure a training place (Haasler, 2020).

Similarly, while the involvement of private companies can help to provide students with hands-on experience with new technologies and equipment that would be unaffordable for schools, introduction of dual training in many countries has been accompanied by generous subsidies to the private sector, which in fact makes the system quite costly. Given that the subsidies often come from European funds, this also raises the question of the sustainability of these schemes should European policy priorities change. As Section 2 of this introduction shows, this is not unlikely. While the EU has a long track record of trying to influence vocational training in its Member States, its policy objectives have above all focused on making the content of training more general and transferable and less occupation-specific, in order to encourage the mobility of students in and out of vocational training and across the borders. It does not help its current cause that these same features have been blamed for undermining the integrity of vocational training and discouraging employer participation in countries with long-established dual VET traditions (Ante, 2016; Powell and Trampusch, 2012).

And finally, and perhaps most importantly, without proper safeguards the emphasis on employability may come at the expense of the quality of education. When taking on apprentices the
employers have an obvious incentive to make them economically productive as soon as possible, but this usually means providing them with a narrower set of skills. The reason dual training requires a complex institutional apparatus consisting of the state, schools, workers’ organisations, and other employers, is to ensure that apprentices are indeed acquiring skills that will make them competitive in the broader labour market, instead of being merely used as cheap substitutes for skilled workers.

In this special issue, we offer an overview of the ways in which different European countries – both those with long traditions of dual training and those where the efforts to introduce the system are still ongoing – have attempted to balance the objectives of competitiveness, employability, education and social integration by adapting the institutions around vocational training. This introduction first briefly presents the concept of dual VET and the reasons that make it such an institutionally demanding system. It then presents an overview of the EU’s approaches to VET in order better to understand the emergence of the current policy. The third and final section summarises the findings of the articles in this special issue. If there is a single conclusion to be drawn from this issue, it is that dual training is far from being the silver bullet for all the ills of the European youth labour markets. While most countries indeed report better employment rates for young people going through the dual VET, in each country some aspect of the system – the quality of training, its inclusiveness, its cost or future relevance – is stirring complaints and demands for further reform. Above all, the case studies confirm that dual VET systems are complex, fragile institutional arrangements, which require continuous investments in cooperation, and it is an open question whether the current policy turn is strong enough to support them.

Why so difficult? The competing logics behind dual VET

Dual VET, or apprenticeship training, is a specific approach to delivering vocational skills, in which a large portion of training (50 per cent or more) takes place in companies, so that students are both employees of firms and working towards a formal qualification that is recognised by the country’s educational system. This distinguishes dual training from other forms of work-based learning, such as internships or on-the-job training that take place outside of the educational system and do not lead to a formal degree, as well as from the shorter and less formalised types of ‘practice’ offered to students in a school-based vocational programme.

This dual status of apprentices as both students and employees leads to a number of coordination problems, the most important of which concern the content and the financing of training. Regarding content, in order for the qualifications to be formally recognised they must correspond to a broader definition of an occupation, and should be broadly transferrable at least within a certain sector of the industry. That means that the content of training should be decided by the sector at large, possibly with the input of public educational bodies, and that there should be mechanisms in place to monitor that the skills are provided in accordance with the programme. For the state and the apprentices themselves a broader set of skills is preferable, as it means more options in the labour market after graduation. The unions too have an interest in ensuring that the apprentices receive a comprehensive training and are not merely being used as cheap substitutes for skilled labour. For the employers, however, this means having to provide their apprentices with skills that are well beyond what may be required by the firm itself, which both makes it expensive and exposes them to poaching by other firms that can make use of the skilled graduates without having invested in training (Acemoglu and Pischke, 1998; Becker, 1964). Moreover, not all firms have the same type of preferences regarding the content of training: larger industrial firms are more
likely to need a wider set of skills from future employees, and can also afford to train their apprentices more broadly than smaller firms (Culpepper, 2007).

The tensions over the content of training are directly reflected in the problem of financing. Employers may bear the cost of training, but they also derive economic benefit from apprentices’ labour. How this work is remunerated is a question that also concerns trade unions, because the answer to it might affect the overall wage structure at the firm. At the same time, should the cost of apprenticeship prove too high for firms, they may be unwilling to train at all, unless subsidised by the state.

This cost-benefit calculation is by no means straightforward, and is further complicated by uncertainty about future labour market and skill requirements, as well as by broader social considerations. Employers benefit not only from the current labour provided by apprentices, but also from screening and lower search costs in the future, though this is less valuable if the labour markets are slack. They can also try to increase the productivity (and future promise) of apprentices by pre-selecting better prepared students, but this may run counter to the preference of the state which typically sees vocational training as a way to ease access to the labour market for those with lower academic achievements. Students may value the immediate financial advantage and the easier access to the labour market that dual training provides, but may be reluctant to commit to it unless the long-term labour market prospects look promising. Finally, and perhaps most importantly, the decisions about the content and financing of training depend less on rational calculations and more on the balance of power between the state authorities, trade unions and different types of firms (Busemeyer, 2012).

In countries with developed systems of dual VET, this balance is usually achieved through coordination between employer associations, trade unions and public educational authorities at different levels of the system – from the overall definition of the country’s future skill needs to the daily implementation of training (see Emmenegger and Seitzl, 2020). If the system works well, it provides young people with an easier transition to the labour market, equipping them not only with occupational skills but also with workplace experience, discipline and valuable contacts (Martín Artiles et al., 2020; Ryan, 2001), and also secures a broad provision of high-level skills and therefore improves productivity and overall industrial competitiveness (Culpepper and Finegold, 1999; Streeck, 1992). However, the lack of balance between different interests can easily distort the system. If the employers consider it to be too demanding or costly, or unnecessary in the given labour market conditions, the result will be under-provision of training. Conversely, if the conditions are considered to be too exploitative or the future labour market prospects unreliable, the system might encounter opposition from students and parents. And very often states might find themselves subsidising employers for training they could be providing anyway, instead of directing resources towards those who would need them more.

**Dual VET in the EU policy: the unlikely bedfellows**

The need for coordination structures that will balance these different interests has led some scholars to label countries with dual VET *collective* skill formation systems, to distinguish them from the *statist* systems, where vocational training is provided by state-funded schools, and *liberal* systems in which the public schooling system provides students with general academic skills, and the costs of occupational training are shared between the employees and employers outside of formal education (Busemeyer and Trampusch, 2012). In Europe, collective skill formation is traditionally a feature of just a few north-western countries: Germany, Austria, Switzerland, Denmark and the Netherlands, though the way the training is organised also varies among these
countries (see Emmenegger and Seitzl, 2020). The majority of the EU Member States, including southern European countries, France, Sweden and Finland, as well as the post-socialist east European countries rely instead predominantly on state-provided vocational training.

The EU does not truly have a mandate to harmonise Member States’ educational systems; in fact it was explicitly forbidden from doing so by the Treaty of Maastricht. Nevertheless, by setting joint targets and conducting benchmarking exercises, by providing funding for specific policy undertakings, and above all by pushing for cross-border mobility and mutual recognition of qualifications, the EU has become increasingly assertive in its role as the driver of national reforms (Loogma, 2016; Powell and Trampusch, 2012). While vocational training has always been part of these policy efforts, the attitudes towards it have shifted significantly over the years.

Up until the 1990s the EU’s role in VET policy remained relatively minor. Article 128 of the Treaty of Rome (1957) did include provisions for mutual recognition of vocational diplomas and certificates in the interest of building a common market, and in 1963 the Council adopted a decision on general principles for the implementation of a common vocational training policy (Council of the European Economic Community, 1963; also Reinalda and Kulesza, 2006). Little progress was made, however, and the subsequent attempts to push through mutual recognition of vocational certificates without substantive harmonisation of training requirements met with resistance. In 1978, in response to this conundrum, the Council of Ministers established the European agency for vocational education and training (Cedefop), with the express task to deal ‘in particular with the problem of the approximation of standards of vocational training [. . . ]’. The agency suggested the use of ‘comparability’ rather than recognition, equivalence, or harmonisation as the approach for accepting certificates within broadly defined occupations. This solution respected the diversity in the content and mode of provision across different national systems, but also meant that many exceptions and reservations continued to limit mobility (Koelink, 1992).

It took another 20 years for this laborious undertaking to garner the political support it needed to become a widely accepted policy tool. The ‘Copenhagen process’ launched in 2002 to improve comparability and mobility between European vocational training systems called for the establishment of a common European Qualifications Framework (EQF), and in 2008 the European Parliament and the Council of the EU both recommended that all Member States should develop National Qualifications Frameworks that would be fully linked to the EQF by 2012. In the same year the European Credit System for Vocational Education and Training (ECVET) was launched, with the aim of breaking down different vocational curricula into ‘units’ that could be accumulated across different training institutions as well as in different countries. Greater transferability of vocational skills was also sought through pressures to increase ‘permeability’ of programmes, i.e., allowing vocational students to move to more general academic tracks, especially at the tertiary level, as well as ensuring certification procedures for skills acquired through informal learning.

Though the policy focus on VET picked up in the 2000s, two things should be noted. First, developments in vocational training largely took place on the sidelines of the far more highly publicised effort to harmonise and strengthen higher education in Europe. The Bologna process was in full swing, and the emphasis was placed on investment in ‘human resources’ in general, and specifically by directing more young people towards tertiary degrees, a commitment formalised in 2010 under the objective of raising the share of 30–34 year olds with tertiary attainment to ‘at least 40 per cent’ (European Commission, 2010). Though officials continued to pay lip service to the importance of vocational training, its role in the future ‘knowledge economy’ was viewed with scepticism. Germany in particular became the target of criticism for failing to join the rising tide of tertiary education, and the culprit was found precisely in its overly rigid vocational training system (Powell and Solga, 2011). Dual training was blamed for slowing down adjustment to the service
economy and stifling job growth (Anderson and Hassel, 2013; Eichhorst and Marx, 2009). It did not help that within Germany itself high unemployment rates and competitive pressures led to declining interest in apprenticeships in the 1990s and early 2000s, and the system had to be bolstered by public funding (Haasler, 2020).

Second, the policies directed specifically at vocational training were less concerned with skill content or mode of delivery, but instead emphasised mobility. Ensuring a common reference framework served above all the purpose of allowing skilled workers to use their qualifications effectively in other European countries. The standardisation of training through ECVET and the pressure for greater flexibility in its provision did however affect the content of training, by encouraging a more ‘modular’ approach. This allowed students to obtain their qualifications by combining credits accumulated in different educational settings (school or company) and even switch between occupations during the course of training. In countries with long traditions of dual training, both developments were seen as a threat to the existing systems. Easier access to skilled workers from other countries was seen to weaken the incentives for employers to train their future workforce locally, and modularisation was understood to be inimical to the ‘occupational principle’ (Berufsprinzip) of dual training that ensured that each apprentice acquired a standardised, comprehensive knowledge of their occupation instead of being trained in a narrow set of skills (Ante, 2016; Powell and Trampusch, 2012; Trampusch, 2009).

The 2010s brought a new twist to the European-level policy discourse about vocational training. Whereas until then cooperation within the Copenhagen process focused on mobility and transferability of qualifications, the Bordeaux Communiqué from the 2008 meeting of the European ministers of education for the first time explicitly included labour market relevance as a priority area for VET reforms (European Union, 2008). Two years later, the Bruges Communiqué abandoned the longstanding agnosticism towards the form of delivery of VET. Instead, it professed an explicit commitment to develop apprenticeship-type training and make ‘work-based learning [...] a feature of all initial VET courses’ (European Union, 2010).

The commitment to the promotion of apprenticeships was reiterated in the 2015 conclusions of the ministerial summit in Riga, and the follow-up agreement between the European Commission and social partners that sets it down as one of the Union’s five educational objectives for the period 2015–2020. The following year, the Commission’s ‘New Skills Agenda for Europe’ vowed to make VET ‘a first choice’ educational option for young people and stressed that businesses – and social partners – ‘should be involved in designing and delivering VET at all levels, as demonstrated in the “dual system” of apprenticeships’ (European Commission, 2016). In the period 2014–2020, financial support was made available for improvements of VET through various European programmes. About €15bn came from Erasmus+ for student and staff mobility, strategic partnerships between business actors and schools and sectoral Skills Alliances, and nearly €30bn through the European Regional Development Fund and the European Social Fund (ESF) for, inter alia, improving the labour market relevance of education and training systems (European Commission, 2016).

The enthusiasm for new apprenticeship programmes is most notable among policy-makers in south and east European countries. The former are struggling with high levels of youth unemployment, the latter with fears of falling foreign investment which they hope to bolster by increasing the availability of skilled labour. Also among the key champions of dual VET are German multinationals, who frequently work with host governments to implement some form of dual VET, usually with institutional support of the German chambers of commerce and the federal Ministry of Education (Martín Artiles et al., 2020).
While some of these experiments have been undeniably positive, overall the implementation of the new apprenticeship programmes remains patchy. The uptake by companies is often limited to the very large, usually foreign, firms, and this means that the vast majority of training, often within the same occupations, continues to be provided by state schools. The weakness of employer associations at the national level in many of these countries means that the overall definition of dual VET curricula is not likely to reflect the needs of the majority of firms. The weakness of the employee organisations, especially at the local and plant levels, means less control over the quality of implementation. All of this fuels fears that short-term ‘employability’ of apprentices will overshadow the educational function of dual VET, leading to lower comparability of credentials and possibly overall lower quality of training (Cedefop, 2018; Rustico et al., 2020).

In response to these risks, the European social partners have demanded that the EU lay down some basic principles of apprenticeships. In 2018, these were formalised in the Council Recommendations for a European Framework for Quality and Effective Apprenticeships which demands, \textit{inter alia}, that all such apprenticeships should be based on a written contract and that apprentices should receive remuneration for their work. The details of the contract, however, as well as its educational content and its enforcement, depend crucially on the strength of local institutions.

On balance, the attempt to promote apprenticeships as a widespread educational option in Europe has certainly positioned the EU as a more active player in the development of the national vocational training systems, especially in countries where such options did not exist before. The goal of improving labour market relevance of education, and doing so by involving the businesses directly in the delivery of training, has been accepted by most European governments. It should be noted, however, that these objectives were grafted onto the existing foundation of the EU’s educational policy which is committed above all to ensuring mobility; therefore the efforts to promote comparability of skill provision, to increase flexibility in delivery and to expand the general skill component in vocational training have continued apace. Yet, as noted above, these features may be incompatible with dual training, thereby weakening employers’ interest in participation, or leading to selective provision of skills instead of comprehensive training – in other words, to less, not more, reliable and comparable qualifications. The Commission’s attempts to rectify this problem by launching sectoral schemes to define the skill content of various occupations at the European level are promising\textsuperscript{6}, but likely to be biased towards the needs of larger firms, heightening the conflicts that are already apparent in many national contexts (Ante, 2016; Haasler, 2020). With dual VET expected to serve many purposes at once, and with many countries still struggling to identify adequate institutional structures to support this collaborative form of training, the outcome for the years to come is likely to be more diversity, not more harmonisation.

\textbf{Conclusion}

The promotion of dual VET in Europe has been happening in the context of efforts to create a qualified workforce for companies operating in different European countries; to support workforce mobility, improve qualifications for young people in a globalised world; and to reduce youth unemployment, especially among the most vulnerable groups. In this introduction we have presented an overview of the scholarly arguments for and against dual VET’s ability to meet these

diverse objectives, and have set the current policy developments against the background of the long-term evolution of the EU’s approaches to VET.

We have shown that the current policy turn towards the promotion of dual VET is a relatively recent development and partly at odds with other longstanding objectives of European educational policy. While most of the policy efforts to date have promoted workforce mobility and investment in general and transferrable skills, apprenticeships have traditionally been used to deliver more specific occupational skills. Ensuring the quality and comparability of training in a system in which a large part of education is devolved to individual companies requires high levels of coordination among the businesses, as well as between the businesses, the states and worker organisations, and many countries in Europe lack the institutional prerequisites for this form of collective skill formation. This is why, despite the investment of significant resources into the promotion of ‘dual’ VET, the results so far have been, and are likely to remain, highly uneven. Rather than any kind of coordinated ‘Europeanisation’ of VET policy, what we are seeing is a situation where certain actors within different national systems seize upon the EU policy discourse and institutional resources to advance national reforms. Often this European dimension is just one of the many triggers of the reform efforts: changing demographic or labour market conditions, shifts in the balance of power and alliances between different interest groups, and the resilience of the already existing governance structures all contribute to shaping national VET systems in different directions.

Institutional experimentation of this kind is both welcome and necessary: indeed, it is essential if a concept of training that has been developed in the economic conditions of the 19th century is to serve any purpose in the 21st. What should be avoided, however, is a situation in which governments worried about the employment prospects of young people reach for dual VET as a quick way to achieve employability, even at the expense of education. High educational and administrative requirements of apprenticeships can discourage companies from training, and this is a problem that plagues most systems that have only recently introduced a dual training component. However, while giving companies more autonomy to decide on the training content could make it more attractive for them to take on apprentices, it will also make the comparability of qualifications more difficult and the quality of training less reliable, which in the long run can only undermine the value of vocational training as an educational option. Above all, the focus on easing the labour market transition for the young people should not come at the expense of employment standards overall, and the standards formulated by the European Framework for Quality and Effective Apprenticeships should be upheld to prevent the use of apprentices as substitute for cheap labour.

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