



JobBridge – time to start again?



A proposal to
reframe,
restrict and
resize Irish
Internship
Policy



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This research was prompted by growing fears within the IMPACT Education Division at the improper use of the Jobbridge scheme within the sector, following the advertisement of Special Needs Assistant posts on the Jobbridge website in Autumn 2014.

Even those who guardedly welcomed the introduction of Jobbridge in 2011 have surely been troubled by instances of abuse and exploitation which have dogged the reputation of the scheme, and greatly undermined the significant number of positive outcomes which were being delivered.

However, an argument could be made that even a flawed instrument like Jobbridge served some purpose in the context of stemming the tide of our skyrocketing levels of youth unemployment and emigration at the height of the economic collapse.

The widespread lack of proper regulation and monitoring is not something which can be tolerated any longer. With strong economic growth now returning and increasing employment levels, we need our labour activation measures to adapt to reflect these changing realities.

The purpose of this research is to set out a new vision for labour activation and internship schemes in Ireland which are more flexible, targeted and fit for purpose in a recovering economy.

The proposals establish a framework which would see the reframing, restriction and resizing of Irish internship policy and the recommendations contained within this report should result in a new and robust system of activation measures and internships in Ireland.

Everyone who participates in an internship programme is entitled to a quality experience which offers training and mentoring opportunities, career progression pathways, and fair reimbursement.

We believe a more targeted approach which recognises the different needs, challenges, ambitions and skill-sets of graduates, non-graduates under the age of 25, and also the long-term unemployed is not only preferable but necessary. The growing culture of open market internships as a pervasive feature of our economy is one which must be addressed too.

It also must be ensured that the scheme is not used to displace or replace full-time paid employment, or drive down basic terms and conditions for workers through overuse and misuse. Trade unions have a key role to play in this and should be facilitated in doing so.

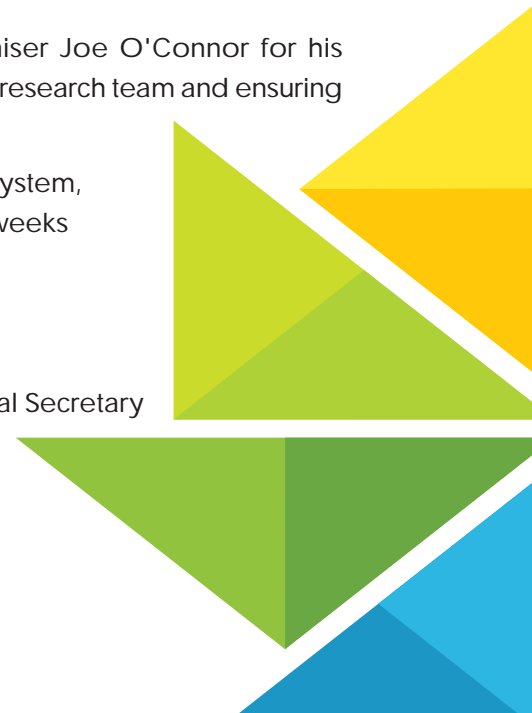
We would like to take this opportunity to thank everyone who participated in the focus groups and qualitative interviews or who provided information as part of our research. Your time and input was much appreciated. Thanks in particular to Dr Mary Murphy of Maynooth University who has done an excellent job in spearheading the research work.


We would also like to acknowledge the efforts of IMPACT Organiser Joe O'Connor for his assistance in driving the initiative, co-ordinating arrangements with the research team and ensuring that the project was successfully completed.

We look forward to engaging with Government, the wider political system, key stakeholders and other trade unions on this issue in the coming weeks and months to work towards reforming Irish activation policy.


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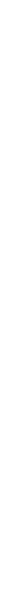


This research was commissioned by the Education Division of IMPACT trade union. It was prompted by a growing unease amongst IMPACT members about the use of JobBridge in the Irish education sector. This research took place over late 2014 and early 2015 and was primarily carried out through reviews of international and domestic literature. Three focus groups were conducted as well as 15 qualitative interviews with a range of academic, policy, trade union, non government organisation and claimants groups. The research confirmed the views of IMPACT members that it is timely to refocus the use of internships in Ireland, to regulate the general use of internships and to target internships in active labour market programmes towards the long term unemployed who experience the most significant obstacles to finding decent employment. The research offers a framework to develop a more coherent and strategic approach to the use of internships in the Irish labour market and an approach that seeks to avoid displacing entry level jobs or eroding labour market standards.



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Short summary of recommendations

This research was commissioned by the Education Division of IMPACT trade union and was prompted by a growing unease about use of JobBridge in the Irish education sector. In the context of economic growth, job creation and an improving Irish labour market, this report argues it is time to reframe, resize and refocus internships in Ireland. IMPACT offers the following steps forward.

The 'one size fits all' JobBridge programme now needs to be dissolved. Other targeted programmes are needed to meet distinct groups with very different labour market integration needs: young unemployed early school leavers; graduates; and long-term unemployed people.

Open labour market internships are pervasive and displacing paid entry level employment, they need to be regulated and monitored, this culture of open internships needs to be actively discouraged.

Compensation: Interns should be adequately compensated at the trainee rate of the minimum wage as a stepping stone to decent paid employment.

Duration and scale: State funded internships duration should be mediated on a case by case basis through Intreo, LES or JobsPlus case workers with longer internships offering possibility of progression. The number of active labour market internships should be proportionate to and no more than 5% of total active labour market interventions.

Regulation: We recommend the internship period is covered as a class A social insurance contribution (consistent with Community Employment schemes) and that regulation of internships be the specific responsibility of the new Low Pay Commission.

Avoiding deadweight is best assured by targetting specifically the most disadvantaged groups and long term unemployed.

Avoiding displacement: To avoid job displacement internships should not be allowed in low value added private sector employment or in the public sector until such time that there is full staffing and no recruitment moratorium. Employment services should ensure state funded internships do not distract from more valuable interventions including apprenticeships, traineeships and JobsPlus.

Churning in and out of precarious work and internships needs to be an urgent focus of the Low Pay Commission and labour law regulations.

Equality of access and outcomes needs be facilitated through a regional internship strategy, attention to working age claimants beyond the live register and investing in child care.

Compulsion: IMPACT strongly recommends that all participation in active labour market measures is voluntary and that support mechanisms are needed to assist vulnerable participants.



JobPath: The out sourcing of public employment services needs to be monitored to ensure that a pay by results regime does not have adverse impacts or unintended consequences.

Monitoring: IMPACT recommend public naming and shaming and withdrawal of other forms of tax breaks or subsidies from bad practice employers but also recommend rewarding good practice through quality kite marks and offering localised human resource supports. Trade unions in specific sectors could have a sectoral or regional monitoring role coordinated by Irish Congress of Trade Unions (ICTU).

Evaluation and value for money needs to be factored into policy design and implementation. Transparency and accountability can be enhanced through continued reporting of Active Labour Market Measures data in CSO monthly live register reports.



Governance: DES/Solas (Apprenticeships and Traineeships), DSP (social protection funded internships for the long term unemployed) and DES/HEA/DJEI (graduate internships) all have a role in developing and overseeing internship policy. A national internship advisory board should enable a governance process that includes other stakeholders (youth, students unions, trade unions, unemployed and women's representatives). This should have a regional dimension.

Youth: First steps should not be compulsory and apprenticeships and traineeships have to be a priority for tackling youth unemployment. SOLAS policy should be informed by the ETUC 2014 resolution in improving quality of apprenticeship and work based learning.

Graduate internship and work experience programmes should be developed in close collaboration with third level education stakeholders and led by and regulated by the Higher Education Authority.

Open market internship programmes have replaced many traditional entry routes in the Irish labour market, internationally legal guidelines are available to determine when minimum wage law should be enforced. Trade unions should proactively contest which open market internships are in fact jobs which should be paid at least the minimum wage.

The Irish Low Pay Commission should report on key patterns in paid and unpaid open market internships in Ireland, provide an overall framework to regulate all internships and support professional associations to promote ethical internship programmes.

The leadership of the trade union movement is vital; rather than playing a narrow sectoral role all unions, through ICTU, need to rise to the challenge of regulating internships and stamping out the culture of unpaid work as the entry route to paid employment in Ireland.

Introduction



JobBridge was introduced in 2011 as a temporary response to high unemployment, massive emigration and negative growth. While the programme has been of benefit to many, clear fault lines in its design and implementation have been identified. Much of the problem with JobBridge is related to its one size fits all nature, its expansive scope across the entire economy and the lack of an identified target group who might benefit from such a programme. There are legitimate concerns about displacement of entry level jobs, other labour market measures and paid graduate internships. There are also value for money issues related to the significant deadweight of a scheme that is now costing €85m per annum. There are also persistent complaints about inadequate monitoring, variable quality and the poor experiences of some participants. There are fears that a temporary government initiative may become a permanent feature, embed a culture of unpaid internship in the open labour market, add to general subsidy of employer's labour costs by the state and create unfair competition and downward pressure on wages.

Perlin notes that globally, the 'use of internships have come at a dazzling speed but are almost naturalised (2012 xiii); 'young people can hardly believe in a world without internships part of a brave new economy of intense competition and altered expectations' (Perlin, 2012 P 3). Ireland appears to have been culturally well disposed to what was once perceived as a largely US tradition of graduate internships. JobBridge became quickly embedded and deeply significant in the lives of Irish young people. However while Ireland is increasingly relying on unpaid work experience programmes, the international trend is towards regulating internships and paying at least 'training' level wages if not minimum wages. This pattern is an international response to increased fears of job displacement and the erosion of long established labour market standards associated with unpaid internships.

Since 2011, economic growth has returned and we see reducing unemployment, albeit these dynamics are unevenly distributed across Ireland. It is now timely and urgent to review the use of JobBridge and internships. Its justification as an emergency measure has dissipated and there is no rationale for its blanket coverage and lack of targeting. Increased Irish economic growth intensifies the inherent vulnerability of JobBridge to job displacement, deadweight and lock in. In a context of economic growth a large scale programme like JobBridge is not an appropriate labour market programme for the Irish labour market. JobBridge also has to be evaluated in the context of the structural shift in the use of internships in the global economy and recent global campaigns for internships to be minimised, regulated and compensated. The danger is that short-term government responses to a labour market crisis may have created a structure that has the capacity to embed a culture of unpaid internships in the open labour market and to displace entry level jobs and more valuable forms of youth apprenticeship and paid graduate training.

This paper contextualises the problem of Irish unemployment and sets JobBridge in the context of wider labour market and activation policy Pathways to Work and then outlines patterns of JobBridge participation, national coverage, sectoral breakdown, age, gender and progression rates. Having reviewed international literature concerned with best practice in internships, domestic evaluations, surveys and commentary, we analyse 15 qualitative interviews with key informants and 3 focus groups of relevant stakeholders and make a series of recommendations to reframe, restrict and resize JobBridge.

The primary focus for this report is a reframed social protection supported national internship programme. JobBridge should be resized and refocused on a specific and narrow target group who have distinct labour market integration needs. We address core policy and implementation features of our proposal for a new national internship programme for the long term unemployed aged 25-64 under the following headings: compensation, duration and scope, regulation, deadweight, displacement, churning and precarious work, inequality, compulsion, privatisation, monitoring, evaluation mechanisms and effective governance. Where relevant we mention specific roles for trade unions. We finish with recommendations for; the under 25 non graduate programme; recent graduate internship programme; and general open internships.

What is JobBridge

Established as a temporary measure in 2011, JobBridge is an Irish National Internship Scheme that provides work experience placements for interns for a 6 month or 9 month period. Participants receive an allowance of €50 per week on top of their social welfare entitlement. The stated aim is to assist in breaking the cycle where jobseekers are unable to get a job without experience, either as new entrants to the labour market after education or training or as unemployed workers wishing to learn new skills.

Employers meeting some basic eligibility criteria self-select and advertise internships and unemployed people apply directly to the employer. Loose eligibility criteria, an informal application process and ex-post light monitoring systems were adopted to lessen obstacles for employers using this largely self-regulating programme. Basic rules include no displacement, numerical limits according to the size of the employer, a cooling off period of six months between internships, a monthly compliance report and random monitoring visits.

While the primary policy objective is to enhance labour supply by providing opportunity for work experience, a second objective is to tackle hysteresis, a feature of post-recession labour markets where job creation lags behind economic growth¹. JobBridge was to proactively prompt demand for labour by encouraging risk adverse employers to explore the possibility of job creation and/or reducing the recruitment cost or perceived risk of employing people from the live register. A Department of Social Protection (DSP) driven initiative, opinions have differed about the degree to which JobBridge should be targeted. While some favoured restricting the programme to the long term unemployed, imperative to widen access won the day with the final criteria, three months unemployed during the previous six months, a relatively loose eligibility criteria. 2011 legal advice was that employer contributions would shift the programme from 'work experience' to 'paid work' and that any employer contribution would oblige payment of the minimum wage. This advice ruled out the possibility of an employer contribution and, under time pressure to launch the programme, influenced the decision to legislate in Section 16 of the Social Welfare and Pensions Act (2011) a definition of JobBridge participants. Issues arising from this policy are discussed later in Section five under 'compensation' and 'regulation'.



There are fears that a temporary government initiative may become a permanent feature, embed a culture of unpaid internship in the open labour market, add to general subsidy of employer's labour costs by the state and create unfair competition and downward pressure on wages.

¹ Hysteresis suggests in early post recessions periods cash poor employers resist job creation preferring instead to maximise productivity of existing labour force through over time etc. The policy intention is to turn such latent demand for labour into jobs.

Section 6 2011 Social Welfare and Pensions Act defines a JobBridge intern as:

‘A person who is engaged by another person to carry out work or perform any duty or service pursuant to a placement under the National Internship Scheme shall, for the purposes of any enactment or rule of law (other than the Tax Acts and the Safety, Health and Welfare at Work Act 2005), be deemed not to be an employee of the other person or to carry out such work or perform such duties pursuant to a contract of service’

JobBridge was originally launched as a temporary programme to run until 2013. However it expanded every year until numbers plateaued in late 2014. While 2011 saw 3,773 participants the annual numbers participating rose to 9,574 in 2012 and 11,380 in 2013 and 12,654 in 2014. As of Feb 12 2015, the latest JobBridge data shows there were 6,172 people currently on JobBridge and an outstanding 1,245 posts advertised. Over the whole period, May 2011 to February 2015, 39,2421 interns had been selected by host organisations, 37,534 had been confirmed eligible and 37,341 had started. The age profile is mixed with largest cohort being the 25-34 years age group and the next largest the under 25 years cohort followed by those between 35-44 years. Gender participation has been relatively balanced. Over 65% of participants had degree level education or higher (22% of participants had a post graduate qualification). 72% had been previously employed full time. As NYC1 (2015) observed of the 65,686 internships advertised by Jan 2015 up to 45% have not been filled. While numbers participating in JobBridge have grown relative to overall participation in activation programmes, numbers are now levelling off, anecdotal evidence suggests employers found it more difficult to recruit in the latter stages of 2014. The level of expenditure rose 23% over 2012 to 2013, with numbers participating rising 17% in the same period but beginning to dip in later 2014. Breakdown by county shows an urban and Dublin bias in JobBridge provision. The distribution by county indicates that five cities account for almost two thirds of JobBridge places, this is problematic as the rural employment deficit deepens.



Of the 15,900 organisations who participate in the scheme 376 have been large and taken on 10 or more and 8 organisations have taken on more than 100 participants. However most organisations (over 13,500) have been smaller employing only 1-8 workers, this has implications for mentoring capacity and progression opportunities. The vast majority of employers 11,302 have been private sector employers with 1,401 public sector and 1,107 community sector employers. Progression rates are higher in the private sector than the public sector and not for profit sector. The sectoral and geographical range of private sector job placements cover a vast range of differently sized employers and firms with implications for potential outcomes. Job placements are distributed in a bifurcated labour market in both low value added and high value added sectors and employment. Any attempt to distinguish more selectively between sectors is hindered by quality of available labour market and skills data but it is possible to identify clear low value sectors including retail.

JobBridge in the context of Irish activation policy

To contextualise JobBridge in the context of Irish activation policy, we first outline *Pathways to Work: Government Policy Statement on Labour Market Activation* the most recent of which was published in 2014. The core objective of Irish activation policy is to ensure that as many as possible of the job opportunities that arise in the economy are taken up by unemployed welfare recipients. 'Pathways to Work' is based on five strands:

- more regular and on-going engagement with the unemployed
- greater targeting of activation places and opportunities
- incentivising the take-up of opportunities
- incentivising employers to provide more jobs for people who are unemployed
- reforming institutions to deliver better services to the unemployed

It is useful to keep JobBridge in context, the DSP (2013) breakdown of expenditure by scheme type shows JobBridge comprises less than 10% of activation investment. In Jan 2015 JobBridge comprised only 6,220 of 85,080 activation places. While JobBridge has garnered the lions share of attention in recent years it is not the biggest active labour market programme. Other programmes are problematic in many respects including for example weaker progression, strong compulsion and control features, poor quality experience, inadequate access to training etc. That said, because JobBridge operates in the open labour market it is more open to displacement of entry level jobs, uncompetitive practice and exploitation than other active labour market programmes.

Fig 1 JobBridge in the context of active labour market programmes



TYPE OF ACTIVATION PROGRAMME	JANUARY 2015
Back to work Allowance	2
Back to work Allowance	11,180
Shoter Term Enterprise	440
DSP Part Time Job Incentive	397
TUS work placement	7,865
JOBBRIDGE	6,220
Community employment schemes (excluding supervisors)	22,927
FAS full time training for unemployed people	7,552
Back to Education VTOS	5,000
Back to Education Allowance	23,497
TOTAL ACTIVATION PROGRAMMES	85,080

Source CSO live register report February 2015

JobBridge does not easily fit into common categorisations or typologies of different types of labour activation strategies or Active Labour Market Programmes (ALMP's); incentive reinforcement, employment assistance, occupation and human capital (Bonoli 2010). Work experience offers elements of occupation but also the promise of training to enhance human capital and remove obstacles to employment. In Fig 2 below DSP (2012) stress JobBridge has a strong labour market orientation, this is important as interventions reasonably close to 'real jobs' secure greater progression outcome (Meager 2010, Kelly et al 2011).

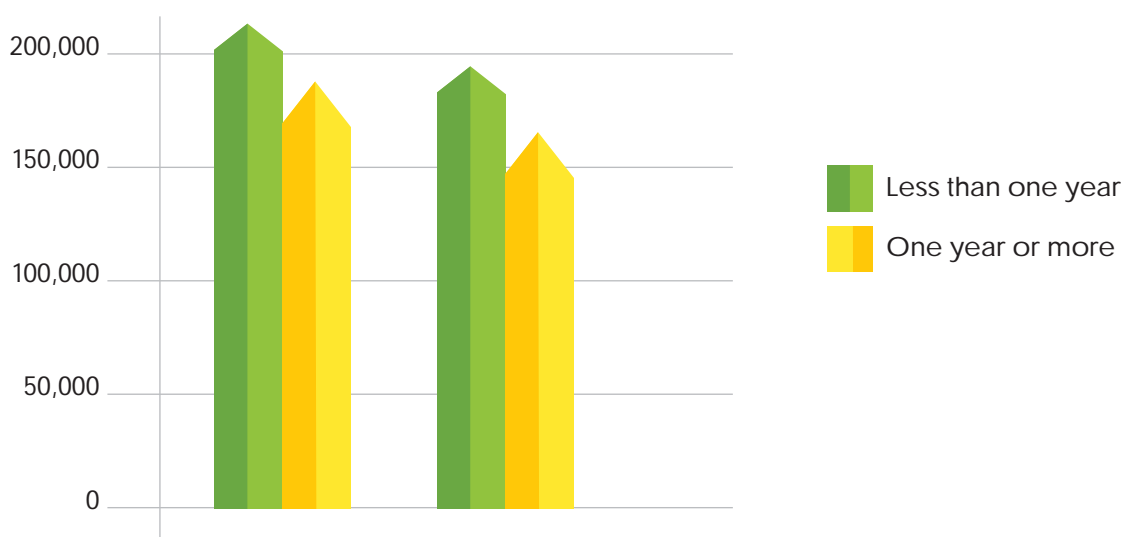


Fig 2 Modified typology of Irish labour market programmes (DSP 2012)

LABOUR MARKET LEVERAGE	MARKET ORIENTATION	
	WEAK	STRONG
SUPPLY – TRAINING	Back to Education Allowance (BTEA)	Certain BTEA courses – such as those with work placement
	Part Time Education Allowance (PTEO)	Certain PTEO courses such as – ITC Skills course
DEMAND – EMPLOYMENT	Community Employment (CE)	JobBridge
	Rural Social Scheme (RSS)	Back to Work Enterprise Allowance
	Jobs Initiative (JI)	Short Term Enterprise Allowance

The strength of the open market orientation of the JobBridge programme is verified in qualitative and survey research with participants who stress the important of recent employment and references as key to successful job search. However this approach requires careful balancing, vigilance and monitoring. If unemployed people are to get open market work experience they are in some way contributing to productivity and therefore open to exploitation if not compensated. International studies show dead weight (subsidising activity that would have occurred in any case) and displacement (subsidised activity in firms impacting negatively on activity and employment in other unsubsidised firms) are risks in 'open market' labour activation programmes.

Fig 3 Persons on the live register classified by duration of continuous registration



Irish long term unemployment stands out as problematic. At 6.6% in Q3 2014 it is above the euro average of 5.9% and the UK at 2.1%, and significantly above the Irish pre-crisis low of 1.2%. The 2015 data (Fig.3) shows Irish LTU declining but 127,000 people still experience significant obstacles to returning to employment. The report *Ending Long Term Unemployment* (NESF 1994) is under no illusion about the degree to which long periods of forced unemployment shatter people's confidence and self-esteem, only 6-13 people out of every 100 people emerge from long-term unemployment without intervention. The more entry level jobs are displaced by internships the fewer routes back into paid employment. While internships can play a role in progressing people into employment, the scale of internships should be minimal and the numbers of paid entry level jobs maximised through initiatives like JobsPlus.

Pathways to Work 2015 (DSP 2014) notes the serious problem of persistence of long term unemployment. This is intensified by various factors including the psychological scarring impacts of unemployment as well as the degree to which employers use length of unemployment as a filter to screen potential job applicants. Both NESF (1994) and DSP (2014) note the importance of work experience in breaking cycles of long term unemployment. Indecon (2013) note a progression rate of 22% for those 2 years + unemployed compared to a general 7% progression rate. Crucially, NESF (1994) argue that work experience only works if it credible and as near as possible to the status and conditions of an employee.

International and domestic reviews

From the international literature, including the EC (2012) traineeship research, EuroFound 2012, EYF (2013), Perlin (2012), Meagar (2010) as well as OECD (2014) and ILO (2012) we can identify some common concerns.

EC (2012b, Pg7) define internships as:

As a limited period of work practice spent at business, public bodies or non-profit institutions by students or by young people having recently completed their education, in order to gain some valuable hands-on work experience ahead of taking up regular employment.

In summary the international trends suggest growing concern about the proliferation of traineeships and internship culture across Europe and globally, but tempered by a notable decline in use of internships in the US after legal intervention that established many interns need to be paid NMW. The trend is towards greater regulation, charters and codes of practice, ETUC² continue to press for progress on these initiatives but employer's federations are resisting a voluntary charter that includes compensation. The EU (EC ,2012) study highlighted a number of traineeship-related areas where further action is required either at EU and/or national levels; a clear definition of traineeships at EU level, more support to include traineeships as a part of study curricula; increased supply of traineeships, especially in SMEs; a Quality Framework for Traineeships offering clear and practical guidelines about high quality traineeships; financial support to trainees, especially those from less privileged backgrounds; more open and transparent recruitment processes for traineeships; and the need for quantitative and qualitative data to assess the quantity, quality, impact and effectiveness of traineeships at both national and EU levels.

2 <http://www.etuc.org/documents/etuc-resolution-european-semester-2014-etuc-key-messages-european-council#.VGsq2smmWeA>
<http://www.etuc.org/documents/etuc-resolution-improving-quality-apprenticeship-and-work-based-learning#.VGsqPsmmWeA>



Aspects of international good practice

Traineeship agreement

A good-quality traineeship should be based on a written agreement between the trainee and the host organisation (and possibly with the training organisation) that covers aspects such as the professional and learning objectives, the duration, the daily/weekly working time and, where applicable, social security and remuneration.

Transparency of information

Rights and obligations of the trainee, the employer and, where applicable, the educational institution. Up-to-date information on legal and other provisions applicable at European and national level should be easily available in a comparable format to all parties involved in organising and taking up traineeships.

Objectives and content

Traineeships should enable the trainee to acquire skills in the workplace complementary to education. To increase the employability of the trainee, it is important to have well-defined objectives and a high quality learning content...

Guidance and recognition

Educational content should be ensured by assigning a personal supervisor or mentor at the host organisation to each trainee who should also evaluate the trainee's performance at the end of his/her traineeship, and provide reference.

Duration

Open-market traineeships should typically not be longer than a specified period, for example six months, to ensure that traineeships are not replacing regular jobs.

Successive traineeships

Successive traineeships with the same employer should be restricted

Social security provisions

Social protection coverage should be clarified between the trainee and the host organisation including health insurance and insurance against accidents at the workplace and insurance obligations as stipulated by labour law in that country.

Remuneration/cost compensation

A guideline on remuneration/compensation should stipulate that the written traineeship agreement specifies clearly what, if any, compensation or remuneration is offered, noting the role that remuneration / cost compensation can play in ensuring access to quality traineeships, and ultimately to certain professions, to (young) people from disadvantaged backgrounds.

Partnership approach

Employers and host organisations should step up cooperation with public employment services (including through the EURES network)

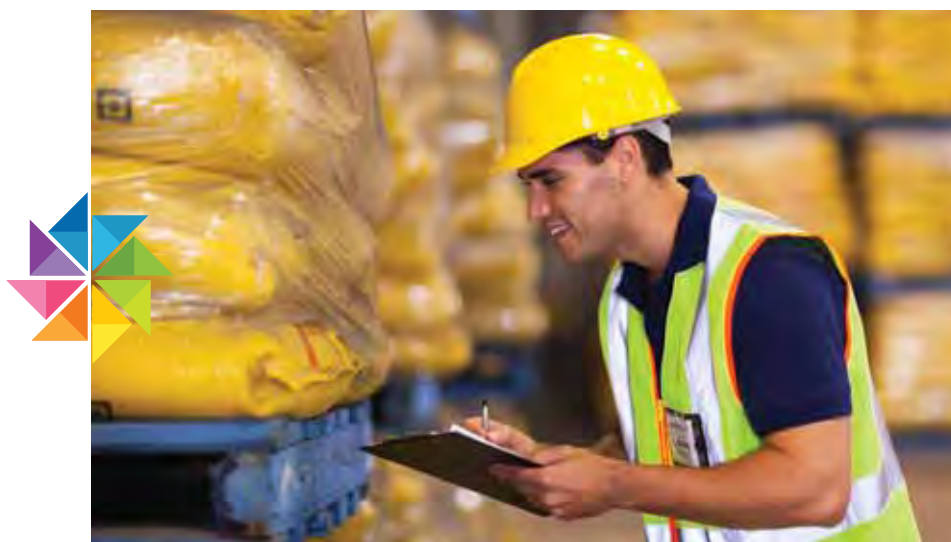
Source EC (2012a)

Irish literature on JobBridge stretches across academic, policy evaluation and public comment. Grubb *et al* (2009), McGuinness S *et al* (2011), O'Connell *et al* (2014) reviews of Irish activation and labour market policy programmes all stress the crucial role data and evidence plays in effective analysis and evaluation and lament significant data gaps in Ireland. Evidence from the 1980's onwards suggests programmes that stress training and open market work experience are most effective from a progression perspective (Meager 2011). Kelly *et al* (2013) conclude training tends to increase employment prospects, provided it is strongly linked to skill demands in the labour market. JobBridge absorbs some of this learning and can be distinguished from other crisis initiated labour market programme, TUS and Gateway, in its clear focus on participants gaining experience in the open labour market *'the objective of this programme is to provide those seeking employment with an opportunity to gain work experience, maintain close links with the labour market and develop their skills through their internship, thereby improving their chances of finding employment in the future'* (Kelly *et al*, 2011).

DSP commissioned Indecon to evaluate JobBridge and this full evaluation was published in April 2013. Kelly *et al* (2013) argue the evaluation was inadequate in a number of respects, and conclude it is not possible to accurately assess the value added of the JobBridge programme from the published report. Bearing this in mind, the Indecon survey found 61% of former JobBridge interns had moved into employment within 5 or more months after finishing their internship. Self-selection bias can account for some of the

impressive progression rates. Despite this overall positive finding Indecon made a series of recommendations; greater participation in the scheme among non-graduates, options for host organisations to pay interns, adjusting duration of internships and 'cooling off' requirement in respect of approval of new placements, support mechanisms to reduce non-completion and assist dissatisfied participants, consistency with eligibility, enhanced website and administration support, annual update evaluation to support, monitoring and assessment of scheme effectiveness and value for money, fundamental biannual review of the scheme to include a control group analysis of scheme impact and enhanced Live Register statistics to aid evaluation. Later (2014) DSP internal analysis suggests one third of early completions of JobBridge are due to employment with the same employer, again suggesting some displacement and deadweight and the use of JobBridge as a lengthy and expensive recruitment process by employers. The DSP intend to commission a more long term and rigorous 'control group' econometric evaluation in mid-2015.

There has since been significant public comment on JobBridge with comments ranging from calls for immediate shut down and monikers of 'scambridge', to demands to increase the programme by 20 fold. In Autumn 2013, USI, ICTU and ISSU collaborated to comment on JobBridge and over Summer 2013 and Autumn 2014 IMPACT and others highlighted issues of displacement and inappropriate use in the education sector. A number of other survey studies (Doorley 2014) and qualitative research (Faduda 2012, O'Connor 2014, Molloy *et al* 2014, Braonain 2013^{3,4}) are also available. The Oireachtas Joint Committee on Jobs, Social Protection and Education has also made critical comment as have trade unions Unite, Mandate CWU, SIPTU and Impact and NGOs including INOU, NYCI and WNL^{5,6}. Recent contributions to the debate were launched by Sinn Féin on Feb 19 2015 and NYCI on Feb 24 2015. The former has called for a new tailored internship scheme with a limited and narrower focus and with less prominence in the overall labour activation strategy. They call for a shorter duration internships and more robust legal foundation for internships building on US legal criteria and perhaps under Joint Labour Committees, full disclosure of participating employers and more meaningful monitoring



3 Indymedia on JobBridge <http://www.indymedia.ie/article/103865>

4 <http://blog.civilrightsireland.com/2014/09/21/getting-job-bridge-back-to-work>

5 TheJournal.ie (2013). Column: The exploitation of young people has been cemented by this government. Retrieved October 22, 2013.

<http://www.thejournal.ie/readme/the-budget-cements-the-exploitation-of-young-people-spearheaded-by-jobbridge-1133185-Oct2013/>

6 Scambridge (2014) http://www.scambridge.ie/The_Journal.ie (2013). Column: The exploitation of young people has been cemented by this government. <http://www.thejournal.ie/readme/the-budget-cements-the-exploitation-of-young-people-spearheaded-by-jobbridge-1133185-Oct2013/> <http://www.thejournal.ie/readme/the-budget-cements-the-exploitation-of-young-people-spearheaded-by-jobbridge-1133185-Oct2013/> Union of Students in Ireland. (2014). Advocacy Groups call for JobBridge to be phased out. <https://usi.ie/collaborations/job-bridge-phased-out-usi/> Walsh AM (2014) Anger as jobless are told: put CVs online or lose dole <http://www.independent.ie/irish-news/news/anger-as-jobless-are-told-put-cvs-online-or-lose-dole-30712631.html> Monday November 3rd 2014 We're not Leaving (2014) <http://werenotleaving.com/category/precarious-work-internships/>

mechanism to avoid displacement from fields where apprenticeships or paid entry level traineeships are more appropriate and to avoid uncompetitive practice. NYCI (2015) recommends JobBridge should be reformed and revised to enhance the experience of participants and increase progression. They call for new analysis to ascertain the real contribution to employability and for the programme to be only available to high progression sectors, for more monitoring for quality and consistency of advertisements, compliance with cooling off period, for a top up payment of €100 and a Charter of Rights. They also recommend all internships should be voluntary, that there should be more focus on mentoring and regional supports.



Acknowledging the scale of and validity of much of the negative commentary, on balance the majority of JobBridge participants report the programme has worked relatively well. Dissatisfaction rates of 20% compare broadly to the experience of European surveys (EYF). ICTU in collaboration with the Union of Students in Ireland (USI), developed a collaborative Youth Position Paper, *Locked Out: Investing in a Future for Youth* which comments on best practice for work placements and warns the scale must be kept manageable and it should not be permanent. INOU likewise argue there is room for a revised and scaled back work experience programme targeted at the long term unemployed. The OCED evaluation of Action Plan for Jobs (2013) argues that unless more is done to help the long-term unemployed find jobs, there is a risk that some of the cyclical increase in unemployment may become structural. A 2014 OECD report on "Options for an Irish Youth Guarantee" concluded JobBridge is a large and expensive programme, having been expanded from 6 000 to 8 500 places in the 2013 Budget without targeting the most disadvantaged groups. They argue while an expansive JobBridge may have been acceptable at a time of chronic unemployment, as unemployment starts to decline it should more closely target on vulnerable groups most at risk of remaining jobless. JobBridge acts as both a recruitment aid and a work experience programme. OECD argue the work experience aspect is more valuable for those without recent labour market experience. They also stress the importance of avoiding minimising "lock-in" effects where job search is put aside during participation in a labour market programme, and that Public Employment Services should continue to support on-going job search especially as participation draws to an end. JobBridge on a part-time basis could also facilitate job search. They also recommend development of a modern apprenticeship programme to enable young people who do not undertake further academic studies to gain useful skills and make a smoother transition from school to work.

JobBridge in the education sector

This research was initiated by the IMPACT education section; the pervasiveness of JobBridge can be seen in this case study of its use in the education division. We present here a summary of how JobBridge internships infiltrate many aspects of Irish education and training provision.

JobBridge is used in most Education and Training Boards, and often to fill administrative positions in the context of the recruitment moratorium and with a particular focus on providing cover for maternity leave. Immediate work pressure means JobBridge participants are often welcomed by ETB administrative staff as 'a pair of hands' and to lighten immediate workloads, 'plug gaps' or act as 'sticking plaster'. However staff are uncomfortable with this scenario and are conscious that moratorium related work gaps are made less visible and 'clouded' by the presence of JobBridge. They express nervousness about embedding use of JobBridge and cultural acceptance of availability of free labour, illustrated in one workers offer '*would you like another one*'.

While ETB staff are conscious of doing what they can to provide a decent work experience and appropriate level of mentoring for interns, work pressures and time constraints mean many find it difficult to give time to ensure adequate training and mentoring. They are also conscious of inadequate monitoring, stressing the light touch monthly compliance report does not fulfil any quality monitoring function. ETB staff report instances of ineffective or inadequate mentoring of interns being the sole staff in reception positions and being without a mentor. They also report the difficulty of raising compliance issues and difficulties accessing the data and information (including serial numbers of JobBridge adverts) needed to pursue a general complaint.

The use of JobBridge in schools has been consistently highlighted as a problem by IMPACT and other unions including the Irish National Teachers Organisation (INTO). Consistent effort is applied to ensure 'Teaching Assistant' adverts are withdrawn on the grounds that there are no equivalent posts, that these could displace SNA's deployment in schools, and that where there are no SNA's in schools interns are offered no mentoring. However there are ongoing concerns that these TA's internships are being used to provide teaching practice for trainee teachers who need a requisite number of teaching hours to qualify for their Masters in Education and who have no other mechanism than JobBridge to complete their required training. Over 2013-2014 31 teachers (primarily principals) were the focus of 63 complaints for advertising teaching jobs under JobBridge, INTO suspended 16 principals for up to 5 months over the last two years for breaking an INTO ban on co-operation with the internship scheme

School caretakers, maintenance and school secretaries are also areas where there are concerns about displacement and alleged misuse of the 6 month cooling off period. A monitoring obstacle is the degree to which schools proactively advertise their own JobBridge places leaving them outside formal HR department protocols. IMPACT has found it difficult to make progress on resolving inappropriate use of JobBridge in the Education Sector; it has taken three years from 2012-2015 to potentially resolve education displacement problems. DSP has eventually responded to ongoing concerns about exploitation and displacement in the education sector by drawing up an education protocol which by early 2015 will be agreed with the Department of Education and Skills (DES) but which IMPACT has had little to no input into.



IMPACT members
express
nervousness
about embedding
the use of
JobBridge and
cultural
acceptance of
availability of
free labour.



Some third level colleges use internships through JobBridge to fill administrative positions as well as skilled research assistant positions in research laboratories in health and science (positions requiring graduate level science qualifications). Analysis of use JobBridge in TCD showed the university sought approval for up to 200 JobBridge internships and up to June 2014 had advertised 111 and utilised 70 of these places. 13 interns gained employment in the college and a number of others who gained employment elsewhere. Concerns raised by both Trinity News and TCDSU focused on this significant reliance on JobBridge to perform basic administrative and research functions of the university and concerns about displacement of administrative and research assistant post. TCD have since reduced use of JobBridge.

Recommendations

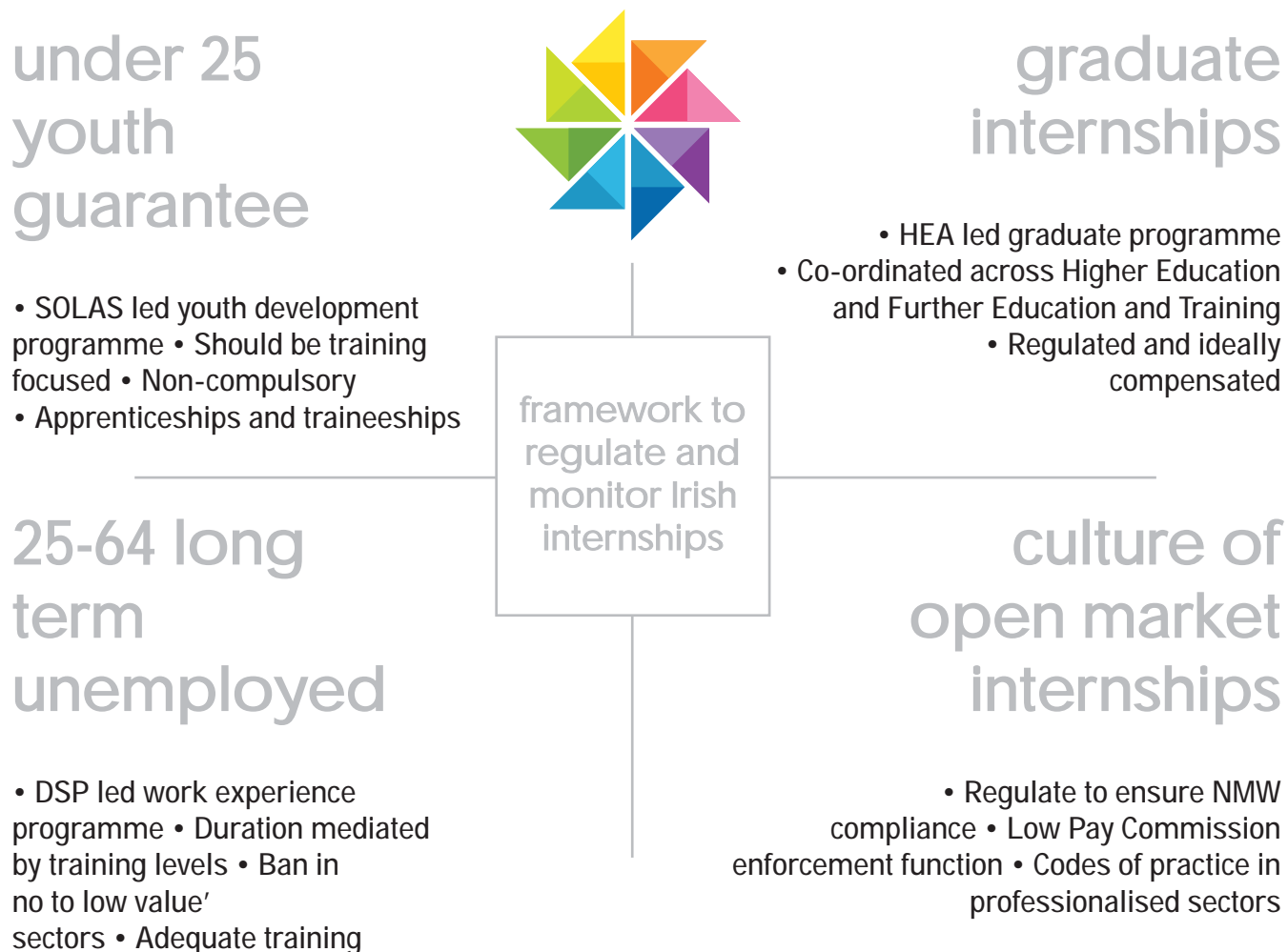
- More generally it is observed that there is no clear audit of the use of JobBridge in the education sector. IMPACT members report a sense of 'anarchy' in how JobBridge is evolving in the sector and argue ICTU should produce a six monthly report on how internships are being used in this and other sectors.
- Given there is no immediate employment prospect in the public sector and given JobBridge may be masking the impact of the moratorium amongst those in the sector there is support for ceasing the use of JobBridge and defining a date (June 2015) after which no new sector JobBridge will commence.
- However there is also support for enabling high quality internships to be part of a future public sector that is at full employment and recruitment capacity.



IMPACT analysis and recommendations

We argue the one size fits all JobBridge now needs to be fully dissolved into three distinct voluntary internship type programmes, each catering for very different groups: a youth development programme, a graduate job placement programme and a work experience programme targeted at long-term unemployed people, Ireland's key labour policy priority. We also argue there is a broader need to regulate open market internships.

Fig 4 Framework to regulate and monitor voluntary Irish Internships



Later we make some specific recommendations to the proposals for the under 25 non graduate programme specific proposals for the recent graduate internship programme⁷ as well as more general comment on more open internships.

Our primary focus for the remainder of the report is a reframed social protection supported national internship programme resized and refocused on a specific and narrow target group who have distinct labour market integration needs. We now address some core policy and implementation features of our proposal for a new national internship programme for the long term unemployed aged 25-64 under the following headings: compensation, duration and scale, regulation, deadweight, displacement, churning, inequality, compulsion, privatisation, monitoring, evaluation mechanisms and effective governance. Where relevant we mention specific roles for trade unions.

⁷ In Irish third level education 411 undergraduate courses include a work-placement, across 23 HEIs, with 10,577 students annually undertaking a placement in non-clinical programmes (Buckley & EL Amoud, 2010, cited in REAP, 2011).

Compensation

Established by law under Section 16 of the Social Welfare and Pensions Act 2011, JobBridge participants are not deemed to be an employee and are presently legally excluded from any definition of employee or wage compensation. Interns receive a payment of €50 'top up' to their current social welfare payment. This top up is the total allowance payable to an intern, regardless of expenses incurred such as childcare, travel, appropriate clothing etc. Host organisations are permitted to provide JobBridge participants with further financial assistance in the form of expense reimbursement. However this is at their own discretion, there is no obligation to do so. Any reimbursement for work carried out by the JobBridge intern is not allowed.



- It may be more useful to define the internship legally as employment at the trainee rate of the minimum wage⁸. This could be a stepping stone to full paid employment.

Present legal framing of the JobBridge programme effectively rules out employer compensation directly to the participant. However DSP acknowledge this legal advice may be contested and there may be some room for employee compensation. To date, for the employer, the financial cost of taking on an intern for the host organisation has been effectively zero. We believe the employers should make an explicit contribution and that this should be primarily in the form of high quality mentoring and training and social insurance. Replacing the state top-up with a top-up from employers could mean employer disengagement and this could well disadvantage people who are very distant from the labour market.

- Employers willing and able to contribute in monetary terms are more appropriately directed to other job creation programmes in particular JobsPlus.

Duration and scale

In practice the different needs of long term unemployed participants and different employer contexts and capacities indicate a need for different variants of an overall internship programme. Needs are mediated by the different occupations and sectors, the needs of participant and the capacity of the employer to deliver mentoring and training.

⁸ Since 1 July 2011 the trainee rates provided by the Act are for first one-third of training course €6.49 per hour (75% NMW) second one-third of training course €6.92 per hour (80% NMW) and final third of the training course €7.79 per hour (90% NMW). Each one third period must be at least one month and no more than one year.

Fig 5 Duration and scope of social protection funded internships



A	B	C
Short: 2 months focused on soft skills maintained on JobPath	Medium: 3-6 months focused on soft skills, some added value accredited training maintained on JobPath	Long: 6-8 months accredited training link to job creation/JobsPlus

- We recommend different durations for different type of internships and that some employers with little capacity to offer meaningful training and mentoring should be restricted to short internships. Longer term internships should offer greater possibility of progression perhaps through JobsPlus.
- The original target for Jobbridge placements was 3,000 but this grew rapidly to 8,500 in 2014. This should be scaled back to a maximum of 5% of all labour market programmes.
- We believe that as long as the recruitment embargo is in place, any new internship programme should not be available in the public sector.
- We believe that any new internship programme should not be available in specific low value added sectors where entry level job displacement is highest and added value for intern is low.

Regulation






While JobBridge is regulated under the 2011 Social Welfare Act, the following table outlining Ireland's regulation of internships and traineeships shows significant gaps in relation to legal definitions and the regulation of duration and social security protection of internships. National legislation includes conditions for Irish traineeships/apprentices. However, these conditions are included in other labour laws not specific to traineeships or apprenticeships. For example national legislation covers conditions on the learning or training element of the apprenticeship or traineeship placement in minimum wage legislation (Korpelainen et al., 2011:40).

The Irish intern has no right to forms of social protection including social insurance and occupational injuries as well as illness benefit, maternity leave etc. Participants' rights in this regard are unclear and contested and this legal uncertainty is a risk for the state, employers and the participant. The legislative framework exempting JobBridge participants from protection of employment legislation and social insurance coverage has never been legally tested or brought to an employment tribunal. It should be noted that CE workers were previously exempted from Class A social insurance but were granted this status in 1997.

Crisis or austerity is no excuse for lack of regulation. In Spain a Royal Decree 1493/2011, of 24 October 2011, established terms and conditions of inclusion in the General Scheme of the Social Security for people participate in training programs. On May 21, 2013, the Spanish Supreme Court revoked the rule that excluded university students from the System. Contribution is now compulsory for university or vocational interns who receive financial consideration during the period of the internship with immediate enforcement⁹.

9 Proceeding initiated by Trade Union Confederation of Workers' Commissions (CCOO), (1717/2011 Royal Decree) http://www.empleo.gob.es/es/Guia/texto/guia_4/contenidos/guia_4_10_5.htm <http://www.mariscal-abogados.com/the-social-security-contributions-of-university-interns/>

Regulation of internships across EU states

Issue	Yes	No	Unclear
 Legal definition of traineeships	AT, BE, BG, CZ, DE, DK, EE, EL, ES, FI, FR, HU, IT, MT, NL, PL, RO, SE, SI, SK	CY, IE, LT, LU, LV, UK	PT
 Legal provisions on duration	BE, BG, DE, EE, EL, ES, FI, FR, HU, IT, LU, MT, PT, RO, SI, SK, UK	AT, CY, CZ, DK, LV, NL, SE	IE, LT, PL
 Legal provision on remuneration	EL, ES, FR, HU, IT, LT, MT, PT, RO, SE, SI, SK	AT, BG, CY, CZ, DK, FI, IT, LU, LV, NL, UK	BE, DE, EE, PL, IE
 Legal provisions on social security protection	AT, BE, BG, CY, EL, FR, LT, RO, SE	CZ, DE, DK, EE, ES, IE, IT, LU, LV, MT, NL, PT	FI, HU, PL, SI, SK, UK
 Absence of legal and administrative barriers for trainees from other EU MS	DK, IT, MT, SE, SI	BE, DE, EL, ES, FR, IE, LU, LV, NO, PL, RO	AT, BG, CY, CZ, EE, FI, HU, LT, PT, SK, UK
 Traineeship contract offered as a common place	AT, BE, BG, DE, DK, EE, EL, ES, FI, FR, IE, IT, LT, LV	CY, LU, PL	CZ, HU, RO, SE, SK

Source EC 2012

We note that Irish regulations allows in certain cases, that if your income falls below a certain amount you do not have to pay a social insurance contribution, however, you will still be covered by social insurance because your employer must pay social insurance for you at class AO (e.g your employer directly pays a contribution of 8.5% on your earnings). There is also provision for class A8 or A9 under which Community Employment participants are covered through a .5% employer contribution. A single adult JobBridge of €238 would cost the employer a €20 PRSI AO contribution^{10,11}). At the very least, and immediately, participants should be covered under Class J subsidiary employment rules and protected against occupational injury.

- We recommend the period is counted as a Class A social insurance contribution (consistent with CE schemes).
- We recommend full attention to regulation of internships be the specific responsibility of the new Low Pay Commission

10 <http://www.welfare.ie/en/Pages/Employers-Guide-to-PRSI-Contributions---sw3.aspx>

11 <http://www.welfare.ie/en/downloads/sw14.pdf>

Avoiding deadweight

Avoiding deadweight means making sure that the same results would not have been achieved without participating in a programme. Indecon shows 49.9% of scheme participants would have secured employment in the absence of completing an internship, at a cost of €21.6m of the €61.2m total expenditure of the scheme up to that time. 95.7% of the 2000+ interns surveyed in Indecon (2013) were Actively Seeking Work before participating in JobBridge with deadweight more significant among graduates and post graduates. Indecon data also shows only 56% completed the scheme, 61.4% of early leavers finished with over 5 months left, mainly to employment with another host but over half did not attribute this employment to participation in the scheme. Deadweight can also occur in the duration of JobBridge with 90% of internships now nine months in duration regardless of the relative skills attainable in the position, the length of internship could be related to the quality of training and experience, restricting low value added sectors to shorter internships. A third area of deadweight is the degree to which JobBridge is allowed to be offered by employers with no or very low added value. There are jobs and/or sectors where JobBridge offers little prospect of progression and should not be used.

- Drawing on the above analysis we concur with the OECD (2013) argument that the best way to avoid deadweight is target specifically at the most disadvantaged groups and to avoid sectors with little prospect of progression.

Avoiding displacement

While Indecon found only 3% or 220 organisations in breach of displacement control guidelines¹², 60% of host organisations, when surveyed, indicated they participated to access a low-cost temporary addition to organisation's workforce. 29% of employers said they would have otherwise taken on an employee and 71.7% of organisations indicated they were motivated to engage with JobBridge to avail of new skills (rather than to give intern new skills). This amounts to significant displacement and also suggests compliance guidelines are both inadequate and ineffectively monitored.

The INOU noted particular concern at links between JobBridge, the rise of precarious and low paid employment and loss of entry level opportunities. Loss of open market entry level opportunities is a consistent theme and many argue JobBridge and internships more generally are replacing such jobs. Mandate (2015) chart 'race to the bottom' scenarios where employers use JobBridge for competitive advantage (particularly in retail) and where competitors respond by cutting hours through zero hour contracts. This reinforces the argument not to allow unpaid internships in low value added sectors (retail and hospitality).

- In particular it confirms fears of a structural displacement of entry level jobs, fears that are amplified internationally (Perlin 2012 p228) and domestically (NYCI 2015, Mandate 2014). Barring use of social protection funded internships in entry level retail and other sectors vulnerable to displacement negates the risk of internships driving down wages in those sectors.
- There are also other forms of internal displacement from other activation schemes, including from other ALMP's and JobsPlus¹³, from apprentices and traineeships and from paid graduate placements. There are perverse employer incentives to use JobBridge over JobsPlus nonetheless it is encouraging that over 4,000 employers chose to use JobsPlus over JobBridge. Any new internship should only be used where participant would not benefit from JobsPlus and every effort should be made to progress participants from JobBridge into JobsPlus.

¹² The Host Organisation currently may not have vacancies in the area of activity in which the internship is offered. A Host Organisation cannot offer an internship in the same area of activity that they have made an employee redundant. The internship will not be provided to displace an employee. The Scheme Administrator reserves the right to review cases where it is reported that this is the case.

¹³ JobsPlus is an incentive from the Department of Social Protection to encourage and reward employers who offer employment opportunities to the long term unemployed. Grants of €7,500 and €10,000 are available depending on the length of unemployment of the JobsPlus participant.

- While apprenticeships and traineeships declined sharply early in the recession prior to JobBridge, the presence of JobBridge also means it is less likely that new apprenticeships or traineeships will evolve. REAP (2011) also reported a decline of *paid* graduate internships over the period of the recession. While primarily fuelled by affordability there is a realistic possibility that JobBridge may also displace traditionally paid graduate internships, (a view shared by some Human Resource consultancies). Targeting JobBridge at the long term unemployed avoids such displacement risk.
- In September 2014, following complaints about job displacement, the JobBridge website was amended to remove all teaching, class assistant, special needs assistant (SNA) and school cleaning positions. The public sector moratorium on recruitment and superannuation agreements (Haddington Road Agreement) also suggests the 21% of JobBridge is being used to ease staff shortage in the public sector. In the context of the public sector recruitment embargo we recommend a cessation of public sector use of JobBridge.
- As with NYCI (2015) we recommend displacement can also be avoided through greater monitoring of employers compliance with the cooling off period.

Churning and precarious work



Pattern of 'churning' occur as participants are cycled between 'low pay and no pay' and between internships.

Patterns of 'churning' occur as participants are cycled between 'low pay and no pay' and between internships (O'Farrell 2013a). Indecon's report notes that the JobBridge participants who found employment are on 56% of average hourly earnings and over one third return to unemployment. A significant number have done two internships and internationally it is not uncommon for interns to do three plus placements (European Youth Forum). Fewer than half (45.2%) of the Indecon surveyed participants held full-time and permanent employment, 9.3% were employed on a part-time, permanent basis. 34.9% held full-time but temporary employment, while just over 10% were employed on a part-time, temporary basis. Potential savings in unemployment benefit/assistance payments generated by JobBridge depend on how long individuals who find work remain in employment and off the Live Register with 5 and a half months representing a net benefit.

- Employment outcomes need to be monitored over a long period to properly estimate impact and value for money achieved by the scheme.
- The longer term issue of churning in and out of precarious employment has to be the urgent focus of the Low Pay Commission and labour law regulations.
- The LPC could also develop a 'threshold of decency'¹¹ quality kite mark for employers seeking state funded wage subsidies and monitor for unintended use of ALMP's or In Work Benefits' to subsidise low pay poor quality employment and for instances of coercion into low paid employment or ALMP's.

Inequality of access and outcomes

There is international concern in the EU Commission (2012), (IPPR 2010), the European Youth Group (2013) and in the US (Perlman 2012) about the degree to which unpaid internships create and perpetuate inequality of access in routes into key professions including arts, media and culture, fashion law and politics (Panel on Fair Access to the Professions 2009). The UK Chartered Institute of Personal Development (2010) track the increasing use of paid and unpaid internships in the UK (20% in 2010 up from 13% in 2005) with up to 50% unpaid. Inequality of access is reflected in Irish discussions concerning class or socio economic as well as geographic access.

Inequality of outcomes by age show mid-year 25-44 years have better outcomes than younger or older cohorts, we also see employment progression outcomes deteriorate the longer individuals have been unemployed prior to their internships. 38% of scheme participants who were previously out of work for over two years are in employment post-internship completion. This falls to only 28.2% among those previously unemployed for three years or more. Scheme participants qualified only to Leaving Certificate or to Junior Certificate or equivalent, experience noticeably lower employment progression outcomes. (Indecon 2013)

- INOU argue there is a need to facilitate long term unemployed from rural areas to benefit from access to urban based internships in specific careers or sectors.
- There is little data to determine patterns of occupational segregation but we do know this is a regrettable feature of both apprenticeships and traineeships. A systematic gender segregation of data is needed to monitor occupational segregation and gendered patterns in employment outcomes.
- Inequalities of outcomes are a graphic illustration of the difficulties created by long-term unemployment and justify recommendations to target the long-term unemployment. However many long term unemployed are not recorded on the live register and are denied access to enabling supports. Qualified adults, people with disabilities and other working aged people without employment would also benefit from access to a revised internship programme. Childcare also remains an obstacle to facilitate access to JobBridge for lone parents.



Compulsion and push factors

Kelly et al (2011) charts the growing international focus on conditionality and compulsion in activation policy and practice. Prompted by the OECD (2007) there is now a soft convergence towards what Brodtkin (2013) describes as a more regulatory form of welfare or workfare. While JobBridge is presented as a voluntary programme there are nuances in how participants perceive their engagement with the programme. EC (2012) suggests increased participation is linked to high unemployment and absence of other viable options. Budget 2014 introduced budget cuts to JSA for young people so that the payment for those aged 25 is now €144.

For those aged under 24 payment is €100. O'Farrell (2013b) argue the stated aim of the social welfare cut 'is to ensure young people are better off in education or training than claiming', suggesting an intended relationship between lower welfare and participation in such programmes. This introduces an element of economic compulsion where many young people have little choice but to do what they can to supplement inadequate income. In addition 2014 regulations have made participation in JobBridge a mandatory requirement of the Youth Guarantee. NYCI (2015) found that participants who felt compelled to participate were subsequently more likely to have negative experience. Employers are most likely to have a positive experience when people choose to participate and that some employers would not participate in a mandatory programme.

- The more general increased application of job seeker sanctions (rising from less than 400 in 2011 to more than 4000 in 2014) creates a greater atmosphere of compliance where people anticipate they may be sanctioned and so 'jump before they are pushed'. INOU point to a discourse that mixes fraud and sanctions creating an atmosphere of mistrust and fear. The ILO stresses the primacy of freely chosen employment and IMPACT strongly recommend that all participation in active labour market measures is voluntary.
- National and international experience suggests participants can also feel compelled to stay in poor quality or difficult employment relationships. INOU argue for enhanced support mechanisms to reduce non-completion of internships and to assist those who are dissatisfied with their placements.

JobPath

Outsourcing and privatisation of job search support and training is now a common feature of activation policy. Evaluation results on the effectiveness of such out-sourcing mechanisms are mixed and implementation mechanisms differ across the different privatisation models (Kelly et al, 2011). However there are potentially negative impacts on the quality of the service from the perspective of the claimant (Brodin 2013).



Any recommendation to refocus a social protection funded national internship programme towards the long term unemployed has to take into account that public employment services for this target will, from later in 2015, be delivered through an outsourced provider under *JobPath*¹⁴. *JobPath* will deliver the public employment services regime for Ireland's long term unemployed and its staff will be 'paid by results' with full payment reached when a long term unemployed person is placed in sustainable employment. This decision mirrors practice in many OECD countries and a number of questions can be asked how this development will impact on work experience programmes.

'Pay by result' regimes may increase use of, or threat of, sanctions whereby unemployed people are pressured into accepting low paid jobs. JobBridge, as presently constituted, is not an employment outcome and it is unlikely that JobPath advisors will promote a significant use of JobBridge. A second deterrent or control on the use of JobBridge is that (unlike education and training options where JobPath case workers can pause or 'stop the clock' in a person's progression time table), a referral to JobBridge and time spent on JobBridge is included in the case workers time frame for employment progression outcomes. This means JobBridge is more likely to be used only when it is highly likely to contribute to employment progression. JobsPlus however is considered an employment option and is likely to be promoted over JobBridge. In the longer term JobPath advisors may use JobBridge to open the door to JobsPlus.

¹⁴ British recruitment firm Seetec is contracted to deliver services in the north of the country and Dublin and an Turas Nua, a consortium of Irish based recruitment company FRS and the UK company Working Links will run the programme in the south of the country. Each contractor will service 25,000 long term unemployed people per annum through a supply chain of sub contracted local private and not for profit local and specialist organisations.

- JobPath and its operation will clearly have an impact on the experience of Ireland's long term unemployed and needs to be monitored closely to ensure that a pay by results regime does not have adverse impacts or unintended consequences.
- Of direct concern here is that people are not coerced or forced into inappropriate options and that overtime internships are not seen as a 'result' or sustainable employment outcome.

Monitoring

JobBridge monitoring mechanisms are under resourced, poor, inconsistent and are more focused on compliance of the sponsor with basic eligibility rules than with monitoring the quality of the work experience or mentoring. Assumptions that quality could be assured through self-policing and voluntary withdrawal of participants from poor quality programmes have not been borne out in practice.

Monitoring Visits conducted on JobBridge Internships by Year up to 14th July 2014



Year	No. of Visits
2011	0
2012	1,052
2013	3,406
(14 July) 2014	2,312
Total	6,770

International experience (EU 2012) shows fear, money, stress and the need for references can compel participants to sit out bad placements. While reported instances of bad practice are responded to by monitoring visits, there are few instances of withdrawal of eligibility. Instead a traffic light system of graded withdrawal allows employers time to respond in a temporary fashion to complaints and withdrawal is partial to specific jobs rather than the company. Indecon (2013 p79) suggest more checks on the actual experience of interns along with more use of case studies and comment of interns. DSP consider that there are diminishing returns from placing more administrative compliance and monitoring rules in the programme. This approach is inconsistent with debates in the EU and elsewhere which suggest a greater focus on regulation and compliance (EC 2012, Perlin 2012) and compliance sanctions or indeed rewards for good practice.

- The EC (2012) recommend public naming and shaming of bad practice employers or withdrawal of other forms of tax breaks or subsidies.
- There is also a case to be made for rewarding good practice, a quality kite mark could be developed for those offering a certain threshold of excellence, such as the that offered by the Irish Association of Supported Employment who offer a 'quality kite mark' for companies who offer work shadowing. Internocracy (2010) operate a youth led internship quality mark 'I.SIP mark'. A broader approach could be to restrict JobBridge to employers who pass a 'threshold of decency' (a number of criteria related to living wage, union recognition, in-company training and progression policy and diversity equality practice).
- Monitoring can also establish employee and employer needs in relation to mentoring, developing human resource policy and support. Local employer forums could provide such support as well as pre-screen risk in specific employments. Employer Liaison Officers already support small employers with paperwork associated with JobBridge and this allows proactive prevention of problems and ongoing monitoring. The local labour market knowledge and involvement in CE and TUS regional monitoring processes in Local Partnerships, Local Employment Services, and the Irish Local Development Network could be used to greater effect.
- Resource limits and absence of union representation in vulnerable sectors limits potential 'hands on' monitoring by trade unions. A good sectoral model for sectors where trade unions are organised is that used for pensions compliance monitoring in construction industry. Trade unions in specific sectors could have a sectoral or regional monitoring role. This could be coordinated by Irish Congress of Trade Unions (ICTU), there are already examples of such sectoral initiatives (IMPACT and INTO (education), IMPACT (Health) and SIPTU).

A rights based approach requires opportunity and mechanisms for participant advocacy and empowerment and complaints and redress processes that can be publically monitored. In the context of blurring of boundaries between public and private and transfers of activation functions from state actors to private 'for profit' companies (for example JobPath) there needs to be a monitoring of practical implications and impacts that are often felt most by the vulnerable and powerless.

- JobBridge type programmes need a clear system of advocacy, complaints and redress, whether that is through the social welfare appeals system or through Work Place Relations mechanisms or a combination of both.



Evaluation and value for money

The DSP does not routinely collate or publish progression data on post scheme outcomes for JobBridge, Community Employment, Tús etc. Rather progression outcomes are in general evaluated as a survey/study basis. Kelly et al (2013, 2011) and OECD (2007) identify a weak culture of programme evaluation in Ireland generally and in labour market programmes specifically. OECD (2013) also note Action Plan for Jobs (APJ) implementation could be further supported by a robust performance assessment and monitoring framework that tracks the impact of APJ actions against quantifiable outcomes and results targets. Later this year the DSP will commission a large scale econometric evaluation of JobBridge and this is

welcome. That said the one size fits all variant of JobBridge means it is essential to segregate sub targets and evaluate outcomes across different sectors. Clear objectives aligned with the national priority of reversing or preventing structural long term unemployment enables a more coherent evaluation.

- Evaluation processes require some political neutrality and distance as well as a macro view and capacity for over sight. As in Australia, there is a need for an external evaluation unit who can support parent departments in processes of independent evaluation. In the British context this model was successfully developed in the British Home Office (although this practice has somewhat discontinued under the present government). NESO could provide this type of macro support.
- Evaluation needs to be factored into policy design and implementation so that control groups are identified early to evaluate against. Comparative evaluation across labour market programmes can also identify optimal investment. Specifically it would be useful to compare JobsPlus and JobBridge.
- Administrative data systems need to be designed to collect adequate pre entry, duration and post leaving data. Such data needs to be long term and broad enough to capture a range of social economic and community level outcomes and sufficiently segregated to track equality and diversity outcomes.
- Mixed method approaches that allow systematic qualitative assessment of processes and quality of service should be developed.

Indecon (2013 p108) link monitoring, evaluation and value for money. There is sufficient evidence of deadweight and displacement in JobBridge to question whether there is efficient and effective use of public resources, a concern of Comptroller and Auditor General Value for Money audits. The 2013 Indecon report suggests 29% of employers would have recruited in the absence of JobBridge, a significant level of misuse of public resources and/or fraud and a less than optimal use of public resources. Public accountability also requires a public account of management of fraud including a public naming of those employers found guilty of fraud.

- Value for money and effective investment of public monies requires regular risk audits and a risk register to ensure public monies are not invested in bad options, in this case sub optimal employers or sectors.

Many argue investment in labour market programmes is at least partially motivated by the political need to show reduced or managed live register figures, this can dampen public confidence in what may be bone-fide measures.

- We welcome the publication of the numbers participating in labour market programmes in the CSO monthly live register report, and the transparency and accountability this offers.



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Governance

Finally there are a number of ways in which the trade union movement can be more responsive to and show leadership in relation to labour market activation in general and JobBridge in particular.

A rights based approach requires opportunity and mechanisms for stakeholder involvement and participation in governance. An Economic Recovery and Jobs Cabinet Committee reviews progress on a monthly basis and coordinates relevant sector-based policies including Pathways to Work. The Pathways to Work Programme is overseen by the Labour Market Council chaired by Martin Murphy CEO of Hewlett Packard. There is no specific governance mechanism for a national internship programme.

There is an ongoing need to review effective governance. In the first instance, there is a need to revise and renew the role of the immediate JobBridge steering group. Models of sectoral governance can include a wide range of stakeholders, unions and NGOs and enable more effective engagement with the Labour Market Council. There needs to be better servicing of all these governance structures with more effective data. The union movement need to demand raised standards for internships, protect against exploitation and displacement and to ensure union relevance in emerging labour markets and amongst younger workers. Ireland needs to commit to quality standards, a clear and coherent code of conduct and regulatory frameworks for internships and apprenticeships as well as systems of certification to recognise acquired knowledge and skills. Good employers would welcome the opportunity to use such kite marks or charters to distinguish them from the bad press associated with JobBridge.

- DES/Solas (Apprenticeships and Traineeships), DSP (social protection funded internships for the long term unemployed) and DES/HEA/DJEI (graduate internships) all have a role in developing and overseeing internship policy. A national internship advisory board should enable a governance process that includes other stakeholders (youth, students unions, trade unions, unemployed and women's representatives). This should have a regional dimension
- Ireland could show leadership by formally adopting and implementing the European Quality Charter on Internships and Apprenticeships;
- The Q4 2015 (CSO 2015) quarterly national household survey shows seasonally unadjusted unemployment varying from 8.6% in Dublin to 13.1% in the midlands. Ireland has a highly centralised governance structure and OECD (2013) comment that the local and regional dimension of job creation needs to be factored in to governance processes.

Finally there are a number of ways in which the trade union movement can be more responsive to and show leadership in relation to labour market activation in general and JobBridge in particular. In general there a sense those unions are only likely to intervene if JobBridge directly displaces or interferes with union members interests.

- Trade Unions, through ICTU, need to develop capacity to conduct a 'watching brief' at a macro level, to support monitoring systems, to brief members how to monitor (including developing monitoring or report forms), to engage in sectoral level on the spot monitoring and to participate in regional and national policy processes.



Youth apprenticeships and traineeships

A crucial priority target for activation, many of the young (18-25) unemployed have little work experience, poor education outcomes and are sometimes discouraged or lacking in self-esteem. They are already targeted under the Youth Guarantee. In Dec 2014 DSP issued a call seeking expressions of interest from private, public, voluntary and community sectors wishing to participate in a 'Youth Development Internship' initiative, to deliver compulsory developmental internships to 1,500 disadvantaged young people between the ages of 18-24. This is now known as 'First Steps'. While we agree a targeted approach for young unemployed is needed we see no rationale for making it compulsory. While acknowledging DSP see the use of compulsion as a 'last resort' to push take up of valid opportunities rather than a control measure we note ILO stresses the need to respect choice in disguised employment relationships. Compulsion can be counterproductive for the more vulnerable youth population¹⁵. Often education or training approaches are more appropriate for those who are significantly educationally disadvantaged but young men may be more attracted to work experience and there may be a value in this point of connection.



The OECD (2010) evaluation of vocational education and training in Ireland 'Learning for Jobs' notes the apprenticeship system (prior to the crisis) is well structured with a systematic blend of on and off the job elements; but limited to a narrow set of gendered occupations. A recent Forfas review of labour market programmes (2011) also describes traineeships as having the highest employment outcomes of all programmes reviewed and complements linkage to the education system, a statutory approach and the involvement of the social partners in the design.

- Both apprenticeships and traineeships were structurally damaged over the crisis¹⁶ and reconstructing both has to be a priority for tackling youth unemployment. That this is now a focus of consultation with SOLAS is most welcome, development should be informed by the ETUC 2014 resolution in improving quality of apprenticeship and work based learning.
- Attention should be paid to gendered occupational segregation with targets for young women across traditionally gendered apprenticeships and traineeships.

¹⁵ ILO (2012) promotes implementing policies that promote full, productive and freely chosen employment, informed by the Employment Policy Convention, 1964 (No. 122 and 2005)

¹⁶ Over the crisis many young apprentices had to complete their apprenticeships through four initiatives established to remedy the situation of redundant apprentices. The duration of FÁS Traineeships were shortened to facilitate greater throughput, creating shorter courses with less accreditation value.

Post graduate internship and work experience programme



Irish graduates (primarily aged 21-30 but sometimes older) often have little in the way of work experience but have strong education and labour market motivation. It is not yet evident that a formal graduate internship is needed in Ireland and there is evidence of significant graduate deadweight in JobBridge. Indecon (p87) shows 35% of employers had participated in internships prior to JobBridge and that 50% would continue to do so without JobBridge. This suggests significant deadweight for DSP in administering and paying for the scheme. In addition there is evidence of displacement with employers less willing to offer students work placements, even unpaid (REAP, 2011:29).

Rather than an issue for DSP and activation policy, this core policy area and regulation and overview of graduate internships should be lead through the HEA in collaboration with SOLAS. An IBEC sponsored 'grad-link' pre-existed JobBridge and a 2014 initiative for a focused post-graduate programme needs to be further developed by the HEA. This can be developed alongside building a work experience programme into Springboard.

The Expert Group on Future Skills Needs argued employers are 'generally satisfied with the technical competencies demonstrated by graduates' (REAP, 2011:35) and that recognised deficits in communication skills, commercial awareness, problem solving ability and the ability to apply theory to practice, can also be addressed through third level education. Nonetheless the Forum of Enterprise Employers to the National Strategy for Higher Education did recommend 'substantial work placements' to 'help address a perceived deficit in the practical application of theoretical knowledge' (REAP, 2011:35). There is already a substantial tradition of graduate professional in-work training in sectors as diverse as medicine, education, creative and media sectors, nursing, law, business, international EU Stagaire, UN and development work, community and youth work, etc. (REAP 2011¹⁷). In Irish third level education 411 undergraduate courses include a work-placement, across 23 HEIs, with 10,577 students annually undertaking a placement in non-clinical programmes (Buckley & EL Amoud, 2010, cited in REAP, 2011). DCU and UL have comprehensive graduate work placement and up to the recession in many instances these were paid.

17 The REAP project is a Strategic Innovation Fund (SIF) collaborative project aimed at developing a model for partnership between higher education institutions (HEIs) and employers and businesses.


Where graduate students take paid placements the remuneration varies from stipends below the NMW to the equivalent of a regular salary. In sectors such as social care, work placements are generally unpaid, however in other disciplines, such as computing and engineering, the placement is typically paid (REAP, 2011). Overall REAP found 36% work placements were paid. Paid or unpaid they are considered an 'important part of the learning experience in many programmes' but the quality of these experiences varies and 'a range of approaches are adopted for awarding credits and assessing learning outcomes' (REAP, 2011)¹⁸.

- Specific proposals for the recent graduate internship programme¹⁹ should be developed in close collaboration with third level education and should be led by and regulated by the Higher Education Authority and point to the many recommendations in REAP (2011) as well as the EC (2012) to legislate graduate interns across the EU.

Open internship programmes

It is clear that even if JobBridge is closed tomorrow that the use of unpaid internships has replaced traditional entry routes into many sectors and that a culture of unpaid internships is now a cultural norm for many young Irish people. This reflects international norms. However there are interesting international developments which suggest this culture is being legally and politically contested. Irish experience to date contrasts with the US and the UK experience where non-payment of interns was successfully legally contested in 2011. Six criteria were laid down in the 2011 US Supreme Court²⁰ ruling to determine who is an intern, all six must be met to establish ineligibility to NMW. To establish internship status the work needs to satisfy the following checks:

- includes actual operation of the facilities of the employer, but is similar to training which would be given in an educational environment;
- is for the benefit of the intern;
- does not displace regular employees, but works under close supervision of existing staff;
- employer derives no immediate advantage from training and on occasion its operations may actually be impeded;
- intern is not necessarily entitled to a job at the conclusion of the internship;
- Both understand that the intern is not entitled to wages for the time spent in the internship.



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These are useful guidelines to direct Irish policy as to when minimum wage law should be enforced. We suggest much internship will not pass the test of these six simple rules, those that fail should have to pay at least the minimum wage and that trade unions should proactively contest such internships.

¹⁸ 2014 ICTU research in Cork city captured valuable feedback from student's leaders about the variability of quality of graduate work placements and internships; this suggests the need for a regulatory framework with redress for students. Interviews in TCD students unions suggests ongoing problems for students with inconsistencies across disciplines but also with a consistent patterns of complaints across disciplines as varied as medicine to engineering or social work. Complaints range from bullying or harassment, off-laying of expenses and accommodation costs, and lack of redress and mechanisms to contest grading for credit.

¹⁹ In Irish third level education 411 undergraduate courses include a work-placement, across 23 HEIs, with 10,577 students annually undertaking a placement in non-clinical programmes (Buckley & EL Amoud, 2010, cited in REAP, 2011).

²⁰ Forbes six US guidelines <http://www.forbes.com/sites/susanadams/2013/06/14/is-the-unpaid-internship-dead/>



This of course requires monitoring and enforcement of laws (Perlin 2012, p221). The role of the Irish Low Pay Commission (LPC) is worth considering in this regard. The British Low Pay Commission has played a monitoring and preventative role in relation to use of British internships in high risk sectors. The 2013 report targeted the fashion industry reclaiming £137,000 wages on behalf of fashion interns who should have been paid minimum wage. The 2014 report targeted the entertainment and media industries working with relevant trade unions. It proactively targets intern online job advertisements and ensures statutory officials provide adequate and clear information brochures and posters to alert employers about NMW obligations and encourages enforcement (naming and shaming, back dating pay awards).

- The Irish LPC could report on use patterns of the training component of the NMW as well as informal use of internships with payment of NMW.
- It could track and prioritise internship related queries to the Work Place Relations help line and monitor instances of cases taken to employment tribunals²¹ as well as actively reporting successes.
- LPC can also track issues related to regulating ALMP internships, traineeships and graduate programme internships.
- Likewise professional associations can also play a monitoring role in regulating the use of social protection (and other) internships. Internationally we see examples of ethical internship programmes in the American Association of Architects, Public Relations Society of America, British Parliament, and the US National Public Radio (Perlin 2012 p221, 229-231). It is also possible to draw on corporate codes of conduct developed by Unions and NGOs and where local NGOs have an ongoing monitoring role.

Finally leadership of the trade union movement is vital; to date trade unions have tended to become involved in disputes about internships when there are specific job displacement issues or structural sectoral issues. All unions, through ICTU, need to rise to the challenge of the wider regulation of internships and to stamp out the culture of unpaid work as the entry route to paid employment in Ireland.

²¹ For example the case of Nicola Vetta v LDMP as cited in the IPPR 2013 p 13

- Barry M (2010) *A bridge to the future. European policy for vocational education and training 2002-10*. National Policy Report – Ireland. FÁS Planning and Research. Cedefop ReferNet Network
- Bouis R and Duval R (2011) *Raising Potential Growth After the Crisis: A Quantitative assessment of the Potential Gains from Various Structural Reforms in the OECD Area and Beyond*, Working Papers No.835, Economics Department, OECD
- Brodkin EZ (2013) Street-Level Organizations and the Welfare State Brodkin EZ and Marston G. (eds) *Work and the Welfare State Street-Level Organizations and Workfare Politics*, NY: Georgetown University Press
- Central Statistics Office (2014), *Survey on Income and Living Conditions 2012 Results*, Dublin: Stationery Office.
- Central Statistics Office (2015), *QNHS Q\$ 2014 Results*, Dublin: Stationery Office.
- Chartered Institute of Personal Development (2010) Internships to pay or not to pay London CIPD
- CSO (2015) Live Register Feb 2015, Dublin CSO
<http://www.cso.ie/en/releasesandpublications/er/lr/liveregisterfebruary2015/#.VRJdreGoM80>
- Department of Social Protection (2014) Ireland *Youth Guarantee*, Dublin: DSP
- Department of Social Protection (2014) *Pathways to Work*, 2015, Dublin: DSP
- Department of Social Protection. (2012). *Pathways to Work: Government Policy Statement on Labour Market Activation*. <http://www.welfare.ie/en/downloads/pathwaystowork.pdf>
- DSP (2014) *Pathways to Work 2015*, Dublin Department of Social Protection.
- European Commission (2012a): Study on a comprehensive overview on traineeship arrangements in Member States ('the Traineeships study').
- European Commission (2012c) Employment Package Proposal for a quality framework on traineeships by the end of 2012 COM (2012) 173, 18.4.2012.
- European Commission (2012b) *Towards a Quality Framework on Traineeships* COM 2912 728 SWD 408, Brussels EC 5-12-2012
- European Parliament (2010) Resolution: European quality charter setting out minimum standards for traineeships to ensure their educational value and avoid exploitation EP 2009/2221(INI), 14.6.2010.
- ETUC (2014) Resolution in improving quality of apprenticeship and work based learning (Brussels ETUC March 11-12 2014).
- Grubb D, Singh S and Tergeist P (2009) *Activation Policies in Ireland, OECD Social, Employment and Migration Working Papers No. 75*, Paris: OECD
- Forbes (2013) Susan Adams Is the unpaid Internship Dead? 6/14/2013
- JobBridge (2011) *General Guidelines for JobBridge*. The National Internship Scheme 22 September 2011
- Internocracy and IPPR (2010) Why Interns need a Fair Wage London Institute for Public Policy Research
- Indecon. (2013). *Indecon's Evaluation of JobBridge: Final Evaluation Report*. Retrieved December 13, 2013. <http://www.jobbridge.ie/toolkit/IndeconReport.pdf>
- INOUE 2014, A Gateway to Work <http://www.inoue.ie/press/2014/02/21/a-gateway-to-work/> accessed November 5th 2014
- Kelly, E., McGuinness, S. and O'Connell, P.J. (2011). "What Can Active Labour Market Policies Do?" ESRI Economic Renewal Series 001, Dublin: Economic and Social Research Institute
- Kelly, E. S McGuinness, P J. O'Connell (2013) Do Active Labour Market Policies Activate? In Edited by P.Lunn and F Ruane Using Evidence to Inform Policy (Dublin ESRI) Ch. 7
- Kildare Street, i.e. (2013). *Dáil Debate: Department of Social Protection National Internship Scheme* Numbers Retrieved December 13, 2013.
<http://www.kildarestreet.com/wrans/?id=2013-10-15a.394>



- Korpelainen S, Nikolova N (2011) Study on a possible framework to facilitate transnational mobility for placements at enterprises. DG Education and Culture Order 117 – GHK. 21 April 2011
- Law society of Ireland (2013) Fact sheet on JobBridge Law society Dublin
- Meager, N. (2009). *The Role of Training and Skills Development in Active Labour Market Policies*. International Journal of Training and Development Vol. 13, Issue 1. 1-18,
- McGuinness S, O’Connell P J, Kelly E, and Walsh JR (2011) *Activation in Ireland: An evaluation of the National Employment Action Plan* (Research Series No. 20). Dublin: ESRI
- McGuinness, S., O’Connell, P.J. and Kelly, E. (2011). “One Dummy Won’t Get it: The Impact of Training Programme Type and Duration on the Employment Chances of the Unemployed in Ireland” *ESRI Working Paper 410*
- McGuinness, S., O’Connell, P. J. and Kelly, E. (2013). “Carrots, No Stick, No Driver: The Employment Impact of Job Search Assistance in a Regime with Minimal Monitoring and Sanctions.” *UCD Geary Working Paper 2013/08*.
- Murray N (2015) ‘16 teachers suspended for cooperating with JobBridge’ *Irish Examiner* Wed 25th Feb 2015 P 1
- National Youth Council of Ireland (2015) *JobBridge stepping stone or dead end* Dublin, NYC
- NESC (2013) *Activation Report No 8* Dublin: NESC
- NESC. (2011). *Supports and Services for Unemployed Jobseekers: Challenges and Opportunities in a Time of Recession*. no. 123. (http://files.nesc.ie/nesc_reports/en/NESC_123_2011_chpt7_chpt8.pdf).
- NESF (1994) *Report No 4 Ending Long Term Unemployment*, Dublin NESCF
- NESF (1994) *Report No 4 Ending Long Term Unemployment*, Dublin, NESDO
- Neuman, H.(1999). *Internships*. Career World, 27(6), 16.
- O’ Farrell R (2013a) the *Polarisation of Working Hours in Ireland* NERI WP 9, Dublin: NERI
- O’Farrell, R. (2013b). *Do the Young Unemployed Need the Incentive of Reduced Social Welfare?* Dublin NERI
- OCED (2014) *Ireland Implementing a Youth Guarantee*, Paris: OCED
- OCED (2013) *Evaluation of Action Plan for Jobs* Paris: OCED
- OECD (2010) *Learning for Jobs OECD review of VET Ireland case study* Paris OECD
- Office of the Comptroller and Auditor General (2013) *Report on the Accounts of Public Services*, Dublin: Stationary Office.
- Panel on Fair Access to the Professions (2009) *Unleashing aspirations: Panel on Fair Access to the Professions Final Report* (London: Panel on Fair Access to the Professions)
- Perlman (2012) *Intern Nation: How to Earn Nothing and Learn Little in the Brave New Economy*. London Verso
- REAP (2011) *Work Placements in Third-Level Programmes*. Edited by Irene Sheridan and Dr Margaret Linehan. Roadmap for Employment- Academic Partnerships. Published by CIT Press, Bishopstown, Cork, Ireland
- Robberecht M A, (2010) *Young people facing a dead end? More and better jobs in Europe!* Study conducted For the European Trade Union Confederation’s conference September 2010
- Sexton J.J (2010) *Youth Employment Measures, 2010 Ireland*. European Employment Observatory EEO Review. October 2010
- Sinn Fein (2015) *Displacing JobBridge* Sinn Fein’s proposals for an alternative internship scheme, Dublin Sinn Fein
- Trinity News (2013) <http://trinitynews.ie/jobbridge-interns-trinity/>
- UK Commission for Employment and Skills (2013) *Not just making Tea reinventing work experience* London UKCES.





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