



ETUC analysis on Union of Skills Action Plan on Basic Skills STEM Education Strategic Plan

Discussed by ETUC's "Training, VET and Skills Committee" on 10 April 2025

Background

The European Commission's published its new umbrella initiative, the Union of Skills on 5 March 2025 which presents over 30 initiatives and actions on education and training.

The [Communication on the Union of Skills](#) was published alongside with two initiatives announced under the Union of Skills, namely: [Communication on Action Plan on Basic Skills](#) and [Communication on A STEM Education Strategic Plan: skills for competitiveness and innovation](#).

Following earlier discussions of ETUC's "Training, VET and Skills Committee" on the [skills first approach](#) and [AI in workers' training](#), and a social partners' hearing on 3 February 2025, ETUC analysed the Union of Skills and issued a [press release](#).

The meeting of the ETUC's "Training, VET and Skills Committee" on 10 April 2025 was dedicated entirely to discuss with the European Commission about these initiatives and their impact on workers and their trade unions. The result of the discussion is this elaborated assessment paper.

ETUC analysis on the Union of Skills

The European Trade Union Confederation (ETUC) acknowledges the European Commission's Union of Skills initiative as an important step toward addressing the challenges of skill gaps and mismatches in the labour market. While the initiative is a timely response to the green and digital transitions, it needs to go further to ensure that **workers' rights, interests, and needs** are at the forefront of the policy. The ETUC stresses the importance of transforming the Union of Skills into a robust framework that guarantees **high-quality, accessible, and inclusive training for all** workers, integrated with fair working conditions and strong worker representation.

The Union of Skills must prioritize **not just competitiveness** but also the **creation of quality jobs with fair wages and decent working conditions**. Training and upskilling initiatives should not merely serve economic growth and productivity but must also contribute to improved **job quality and social protection for workers**. The ETUC calls for a comprehensive approach where access to workers' trainings and skills development is linked to the **creation of sustainable jobs that offer secure employment, fair pay, and social benefits**.



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There is a real risk of overemphasis on enhancing competitiveness without safeguarding workers' rights. Workers should not be asked to shoulder the **cost of upskilling** while receiving little benefit in return, either in terms of higher wages, job security, or improved working conditions.

ETUC regrets that the Union of Skills does not answer to the needs of the low-skilled and low qualified as it focuses mostly on talent search. The targets on STEM studies are a good first step, but the initiative should also answer to how to make education and training truly inclusive and not only on STEM subjects.

Legally Binding Right to Training

One of the key issues identified by the ETUC is the lack of a legally binding right to training for all workers. While the Union of Skills rightly acknowledges the need for continuous learning and adaptation, it fails to make **training a universal and enforceable right** despite that the European Pillar of Social Rights was signed in 2017 and several benchmarks were set up by its follow-up actions plans. The ETUC demands that the European Commission introduce **legislation** guaranteeing workers the right to training, including training on new technologies such as artificial intelligence (AI), during paid working hours. This training should be free of charge and accessible to all workers, irrespective of their employment status.

The Directive 2019/1152 on transparent and predictable working conditions in the European Union, which needs to be implemented, mentions *“training entitlement provided by the employer”*, and Article 13 on Mandatory training says: *“Member States shall ensure that where an employer is required by Union or national law or by collective agreements to provide training to a worker to carry out the work for which he or she is employed, such training shall be provided to the worker free of cost, shall count as working time and, where possible, shall take place during working hours.”*

Collective agreements should be in place in every workplace, but where it is not the case, **Union or national law** needs to support access to training of the workers. ETUC regrets that the Union of Skills, while it focuses on the need of upskilling and reskilling of the workers, do not make any move forward towards this direction. Without a legal right to training, workers are left vulnerable to market forces, where access to upskilling and reskilling opportunities may depend on the goodwill of employers, leaving many behind, especially those in precarious or low-wage employment. A binding right to training would ensure that all workers can access the tools they need to succeed in a rapidly evolving job market, regardless of their circumstances.

Employer Responsibility and Social Conditionalities

The ETUC is concerned that the Union of Skills places insufficient emphasis on the **responsibility of employers** in providing training. Given that 128 million adults in Europe need upskilling and reskilling (CEDEFOP), the role of employers is crucial.

The suggestion for a Skills Guarantee pilot, just like other initiatives, eg the continued implementation of Individual Learning Accounts (ILA), micro-credentials and upskilling and reskilling through bootcamps and short courses in STEM sectors, put the responsibility of the upskilling and reskilling of the *“workers in sectors undergoing restructuring or at risk of unemployment”* to the workers' themselves instead of the companies. Especially in the case of the Skills Guarantee, without targeted funding, the active involvement of trade unions and a



correct Just Transition approach, such initiatives risk being overlooked. At the same time the Union of Skills does not respond to ETUC's continuous demand to ensure access to free and quality career and training **guidance** to the workers, nor it reflects to our call to **improve systems of validation** of informal and non-formal learning.

The Union of Skills mentions only once a “*call for **companies to invest in upskilling and reskilling their workers of all generations to adapt to ever-changing challenges and opportunities***”, while immediately giving them an excuse not to invest to their workers' training by adding that companies, especially SMEs “*need the right incentives and support to make these investments feasible*”. The initiative proposes piloting a Skills Guarantee to support training initiatives, it foresees promoting the “*reskilling of the workforce through public procurement*”, and it plans to evaluate the “*quality and relevance of investment in education and training*”. ETUC stresses that **trade unions need to be involved** to these actions which should not be a substitute for employers' duty to invest in their workforce's development.

Any financial support or subsidies offered to employers must be tied to clear **social conditionalities**. These should include commitments to provide training during paid working hours, ensure fair wages, and respect collective bargaining agreements. Employers should be held accountable for ensuring that training is not only provided but also aligned with workers' needs, offering pathways to decent jobs and career progression. In this regard, advancing the goals of the Clean Industrial Deal should involve incorporating social conditionalities into public funding, particularly by linking public support to investments in social dialogue, upskilling, reskilling programs, and quality apprenticeships. We expect the Commission, as outlined in the Clean Industrial Deal, to reform State Aid rules to leverage public funds in a way that incentivizes and supports such initiatives, ensuring that when public money is involved, it is tied to training and apprenticeship opportunities.

Governance and Worker Representation

Despite the Union of Skills highlights that it will promote that “*Social dialogue at all levels – European, national and local – is key to shaping skills development through collective bargaining, running training and development funds, guidance services and matching jobs with skills*”, many of its actions are silent about how the trade unions will be involved in the governance on these initiatives.

The ETUC is also concerned about the governance structure of the Union of Skills. The proposed **European Skills High-Level Board** and **European STEM Executive Panel** risk concentrating decision-making powers in the hands of businesses, with minimal worker representation. This poses a threat to workers' interests, as companies will prioritize profit-driven outcomes over social and labour considerations, and they prefer education and training systems to answer to urgent and short-term needs of the labour market, instead of investing to the skills development of their own workforce.

The ETUC demands a more inclusive and democratic governance model. The decision-making process around skills development must involve all social partners, including trade unions at national and sectoral levels. This ensures that the skills policies align with workers' needs and are fair and equitable. A tripartite approach that includes equal representation for trade unions, employers, and government authorities at both national and sectoral levels is essential. ETUC recalls the Council decision which formally established the tripartite Advisory Committee for VET (ACVT) in 1963 which since that time has adopted several opinions to support the European



Commission's policies on VET and skills. We ask to strengthen the role of the ACVT in the governance framework of the Union of Skills initiative, instead of giving the leadership on skills policies to CEOs, and if necessary broaden ACVT's participation to sectoral social partners.

Qualifications, skills and competences

The ETUC advocates for a broader definition of skills development that encompasses not only technical skills for the labour market but also transversal skills and key competences leading to **formal qualifications** that improve workers' career prospects and working conditions. Trainings should be designed together with workers to help them with acquiring **recognized certifications** that are valuable across industries and sectors.

Furthermore, in the context of digital transformation and the rise of new technologies, education and training should also improve **citizenship competences**. Workers must be equipped with the knowledge to defend democratic values, understand and uphold labour rights, and combat misinformation in an increasingly digitalized world. This holistic approach will empower workers to engage more actively in their communities and safeguard their rights both in the workplace and beyond.

ETUC regrets that the Union of Skills continues advocating the “**skills first approach**” while it sees qualifications mostly as obstacles of mobility of learners and workers instead as a **basis of quality jobs and good working conditions**. The text does not acknowledge that the employed and unemployed need further support to **obtain full qualifications or to improve their qualifications levels**. The initiative proposes many actions which ignores that education and training are national competences and that skills and qualification requirements are decided and updated regularly with the involvement of the **social partners**. The solution the Union of Skills proposes is further steps towards foreseen harmonisation of national study programmes to joint European programmes starting from initial school education (European School Alliances), VET (European VET diploma/label; Centres of Vocational Excellence) until higher education (European degrees; European Degree for Engineers) and to influence national curriculum design (eg by STEM skills in ESCO classification, STEM Competence Framework).

Other suggested actions, namely the “Skills Portability Initiative” and a European framework for the automatic recognition of study qualifications should be developed in relation to workers' needs and not only labour market needs, and with the involvement of the trade unions. While we welcome the efforts to streamline the acceptance and validation of skills and qualifications across Member States, we believe that in the Skills Portability Initiative, especially in the context of the Just Transition, should also focus on recognition of skills and training certificates between companies across and within sectors.

For ETUC it is questionable how workers can benefit from an EU legislative proposal on recognition of qualifications of **non-regulated professions**. It would be important to analyse why EU countries have not suggested establishing Common Training Frameworks as a solution to ensure **automatic recognition of more regulated professions**. ETUC asks the European Commission to involve trade unions in the possible revision of the Directive of Recognition of Professional Qualifications and in the governance on implementing this directive.



STEM, Artificial Intelligence and Basic Skills

The Action Plan on Basic Skills underlines that 47.7 million low-qualified adults (age 25-64) and 18 million underachieving pupils need urgent help to improve their basic skills, which the European Commission identifies as literacy, mathematics, science, digital and citizenship. The Action Plan on Basic Skills rightly mentions the lack of access to digital skills and other basic skills for the adults. The importance of parental involvement in basic skills development of the youngsters is also key, but the EU and its Member States still lack strong policies and investment to adult learning and to outreach strategies.

It is regrettable that the Action Plan does not consider social dialogue and partnership with trade unions among the solutions. In order to improve access to adult learning and ensure outreach to the low-skilled and low-qualified, unfragmented governance system and trade unions' strong participation in the governance are essential. It would be also important to support trade unions as training providers of basic skills.

Further efforts are needed to make VET more attractive also by enhancing basic skills and key competences in initial VET. The upcoming Herning Declaration is an important next step to make initial VET attractive for the students and parents with continuous development of basic skills and key competences that are essential for life and labour market, including language learning, learning to learn, citizenship, teamwork, and creativity. ETUC welcomes the idea to create a toolkit for basic skills for apprenticeships as a guidance for VET schools and employers. We ask to include trade unions in developing this initiative in order to ensure that it meets the needs of the apprentices and that it further supports the implementation of the [Council Recommendation of 15 March 2018 on a European Framework for Quality and Effective Apprenticeships](#).

ETUC regrets that the role of employers in training their workers in basic skills and STEM skills and their role in outreach and guidance to support low-skilled and low-qualified workers to improve their STEM and basic skills are not taken into consideration. At the same time, the STEM (science, technology, engineering and mathematics) Education Strategy Plan reflects to the employers' needs rather than the workers' needs. We are concerned that this initiative rather focuses on talent search instead of supporting the low-skilled to upskill and reskill in STEM. The action on "Capacity Building for STEM" for education institutions in EU enlargement and EU priority countries seems rather an organized brain-drain of talents to the EU labour market under the Talen Pool initiative. Attracting and retaining workers in STEM-related professions also depends on the availability of high-quality apprenticeship programs that offer fair remuneration and guarantees supporting long-term job retention.

ETUC regrets that the Union of Skills hardly speaks about AI's impact on training needs. While the integration of AI into the workplace offers opportunities, it also raises significant concerns. The [ETUC emphasizes](#) the need for AI literacy programs as part of the broader skills development strategy. Workers must be equipped to understand AI systems, their implications for work processes, and how they can be involved in the design and implementation of these technologies. AI literacy must be included in training programs conducted during paid working hours. Moreover, the introduction of AI should not lead to job losses or exploitation. Workers and their representatives must be involved in decisions related to the deployment of AI to ensure that it benefits workers, rather than replacing them or undermining their rights. ETUC advocates for clear guidelines and regulations on the ethical deployment of AI, with strong oversight to prevent discrimination, surveillance, or other harmful impacts.



Independent research-based policy

ETUC has been repeatedly asking to improve research-based EU policy making by identifying better definitions (eg adult learning) and better benchmarks (eg participation in adult learning or in basic skills) which can ensure that EU policies provide real solutions to upskill the low-skilled and low-qualified people and to support access to workers to trainings within and outside of the workplace. ETUC regrets that the Union of Skills suggests a different solution on research-based policy, namely centralization of all skills related research under the European Commission / Eurofound.

According to its Founding Regulation, *“Cedefop's objective shall be to support the promotion, development and implementation of Union policies in the field of vocational education and training as well as skills and qualifications policies by working together with the Commission, the Member States and the social partners.”* ETUC is concerned that the proposed European Skills Intelligence Observatory will change the governance of European-level research on skills given that this Observatory is not planned to be governed with the involvement of social partners, while its work will have an impact on the mandate of CEDEFOP which is lead by a tripartite Management Board, where trade unions are also involved.

Considering that CEDEFOP focused on data on skills shortages, skills forecasts and real-time skills needs (via vacancy notes – OVATE) and that the Europass portal has already merged all relevant information at EU and national levels on training and working in EU to one portal, including information on qualification frameworks and recognition of qualifications, ETUC wonders why to invest additional budget to another skills related data portal.

ETUC Demands

The ETUC views the Union of Skills initiative as a promising starting point for addressing the skills needs of the European workforce. However, for it to truly serve workers' interests, the ETUC calls for the following key measures:

- A legally binding right to training for all workers, including access during paid working hours.
- A real Skills Guarantee instrument that provides effective support to workers, particularly in critical sectors undergoing restructuring as a result of the green transition.
- Employer accountability for providing free, continuous training, linked to collective agreements and fair working conditions.
- A focus on quality jobs that guarantee fair wages, job security, and decent working conditions for workers.
- Access to training programs and formal qualifications and equip workers with skills to engage in democratic processes and combat misinformation.
- A tripartite governance model of the Union of Skills with equal representation for trade unions, employers, and governments, ensuring balanced decision-making on skills policies within ACVT.
- Involvement of the trade unions in shaping the Skills Portability Initiative, and a possible revision of the Directive of Recognition of Professional Qualifications;
- A stronger focus on reinforcement of apprenticeship programs that ensure high quality, fair remuneration, and job guarantees upon completion.
- We ask to strengthen the role of the ACVT in the governance framework of the Union of Skills initiative, instead of giving the leadership on skills policies to CEOs, and if



necessary broaden ACVT's participation to sectoral social partners. We ask ETUC's and sectoral trade unions' involvement to the High-Level Skills Board.