

ROYAL DECREE 1065/2025, OF 26 NOVEMBER, IMPLEMENTING THE TRAINING CONTRACT REGIME.



I. Introduction.

The Council of Ministers has approved, at the proposal of the Ministry of Labour and Social Economy, Royal Decree 1065/2025, which develops the training contract regime provided for in Article 11 of the Workers' Statute, as follows:

- **Work-study training contract (11.2 ET)** to combine work with training aimed at obtaining a vocational training qualification, university degree or qualification from the SNE training specialities catalogue.
- **Employment contract for obtaining professional practice (art. 11.3 ET)** for people who have already obtained a vocational training qualification, university degree or equivalent that qualifies and trains them for work.

II. Most relevant new developments.

1. Maximum number.

A maximum number of training contracts in force at the same time per workplace (Art. 2) is set based on a specific scale depending on the size of the workforce:

- Workplaces with up to 10 employees → maximum of 3 training contracts.
- Workplaces with between 11 and 30 employees → maximum of 7 training contracts.
- Workplaces with between 31 and 50 employees → maximum of 10 training contracts.
- Workplaces with more than 50 employees → maximum 20% of the total workforce.

To determine the workforce, specific rules are established for workers already bound by a

training contract, with a part-time or fixed-term contract, or who are disabled.

Sectoral collective agreements may reduce these limits on training contracts and establish commitments to convert them into permanent contracts upon expiry. Work-study training contracts linked to public employment programmes are not subject to these limits.

2. Enhanced right to information.

The workers' legal representatives receive not only a basic copy of the contract, but also the individual training plan.

3. Collective bargaining.

Sectoral agreements are enabled to reduce limits on training contracts and establish commitments to convert them into permanent contracts, in addition to setting gender equality criteria.

4. Prior verification of training activity.

Prior to formalising the employment contract, the company must verify that, for the specific work activity to be performed, there is a training activity that corresponds to one of the training processes that may be covered by the work-study contract, which will constitute the training activity inherent to the contract.

5. Cooperation agreements with training centres and training plan.

Companies must sign cooperation agreements with training centres/entities and also draw up and sign an individual training plan for each person hired under a work-study contract. In addition, they will have an academic and company tutor.



6. Internal Training.

The training inherent to the contract may be provided within the company itself when it has appropriate facilities and is registered in the corresponding register, without the need for a cooperation agreement; however, the company must draw up the individual training plan and communicate the number, identity and corresponding individual training plan to the RLT.

7. Funding.

Companies may apply the subsidy for costs arising from mentoring activities, but in any case, the subsidy financing scheme provided for training programmed by companies shall not apply to the financing of mentoring activities under training contracts.

8. Trial period.

The contract for professional practice may establish a trial period that may not exceed one month, unless a shorter period is established by agreement.

9. Interruption of the calculation of duration.

Situations of temporary incapacity, birth, adoption, guardianship for the purposes of adoption, foster care, risk during pregnancy, risk during breastfeeding, gender-based violence and sexual violence, which have a suspensive effect on the contract, shall interrupt the calculation of the duration of the training contract.

10. Fraudulent use of the law.

The use of training contracts must respond to training needs and it is not permissible to pay wages lower than the minimum wage calculated according to working hours.

Companies wishing to sign training contracts may request information from the competent SEPE (Public Employment Service) about the contracts previously entered into by the candidates and the cumulative duration of those contracts.

Training contracts that constitute fraud or those in which the company fails to fulfil its training obligations shall be deemed to have been

concluded for an indefinite period of an ordinary nature.

III. Entry into force.

The Royal Decree shall enter into force 20 days after its publication, i.e. on 17 December 2025. From that date onwards, companies and training entities must adapt their practices to the new provisions, ensuring that training contracts are carried out under a clearer legal framework.

In summary, the Government, through unilateral regulations, is introducing new obligations in training contracts that companies must comply with in order to avoid penalties from the ITSS.

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