



14 July 2021

Joint contribution to the Commission consultations on individual learning accounts and on micro-credentials

AGE welcomes the planned initiatives to introduce an EU framework for individual learning accounts and for the provision of micro-credentials for life-long learning outcomes to be used in other places. AGE welcomes these as contributions towards achieving principle 1 of the European Pillar of Social Rights and its recently released Action Plan, including a target to bring participation in life-long learning to 60% of all adults taking part in learning in the past year. It also contributes to the EU's achievement of SDG4 on quality education, specifically SDG 4.4 on relevant skills levels, SDG4.5 on equal access to education and training, SDG 4.6 on literacy and numeracy and SDG 4.7 on knowledge and skills for sustainable development.

AGE takes the opportunity to highlight a number of key principles on education and life-long learning relevant to older learners and to allow for active and healthy ageing for all. Therefore, the present paper constitutes a submission to both consultations mentioned.

AGE main approach to education and life-long learning

AGE has taken part in several consultations in the recent years that focussed on life-long learning and training, the main elements of which will be highlighted below. AGE has notably taken part in the [Commission consultation on the revision of the Digital Education Action Plan](#), provided [substantial inputs](#) to the United Nations Open-Ended Working Group on the promotion of human rights of older persons on the right to education in 2019, and further refined our demands in form of a [normative contribution](#) on this right in the context of ageing in 2020.

We want to highlight how older persons are often forgotten in policies fostering life-long learning and education:

- Outside of the labour market, very few structured initiatives and learning offers exist for persons who are already retired.
- Learning offers available to working-age people often are no longer available past retirement age, reducing the chances of persons past pension age to stay involved in the labour market
- In later working life, participation in training and life-long learning is particularly low and has not increased much in a decade. Participation in the past 4 weeks has been 4.8% in 2020 for the 55-64 year-olds
- No statistics are collected for participation in life-long learning beyond age 65 by Eurostat
- Learning opportunities are seldomly accessible for persons with disabilities, and especially in rural areas, transportation to participate in learning is a challenge to many older persons





- Information about learning offers and opportunities are often not geared towards reaching older persons, a phenomenon intensified during the COVID19 pandemic as more information and registration procedures moved online.
- Connected to this, the digital gap is a challenge for many older learners, as broadband access is limited in many rural areas, technical equipment that enables participation in digital learning is expensive and has a very short life-cycle and many older persons had no opportunity to acquire up-to-date digital skills needed to participate.

AGE approach to individual learning accounts

AGE welcomes the initiative to introduce individual learning accounts and believes these are a good way to build a life-long learning culture. Societal and technological developments are taking place at an increasing pace, putting not only older workers in positions of outdated skills, therefore fostering learning on the individual level can be beneficial to make careers more sustainable. A life-long learning culture has also important outcomes in improving one's mental and physical health beyond the labour market, as mounting evidence shows health in older age is correlated with educational achievement.¹

However, **in itself the individual learning accounts will not be sufficient to trigger this change**. The connection with the initiative on micro-credentials is essential, but even more so is the scope of the planned initiatives. They should be connected to a **right to take educational leave**, be flexible enough for both employers and employees to choose the best timing and training funded by the accounts, be automatically credited by employers or public authorities and transferrable between jobs, unemployment periods, borders. The quality of provided trainings is essential, as well as proper public guidance about available training opportunities to also encourage take-up of the learning rights on the account. Several barriers to life-long learning persist and could be lifted by an ambitious legislative proposal.

Employers' fear to lose a worker once he or she has acquired better skills, reducing their motivation to invest in training and particularly so for older workers. On top of that, they do not always understand the merit of investing into employees they see as leaving soon into retirement and/or unable to learn at their age, although older workers tend to stay longer with the same employer than younger ones. Age discrimination exists in the access to training and learning, although this is supposed to be tackled by EU Directive 2000/78/EC.

For employees, **trainings that directly support their skills within the remit of their employer's activity should be entirely borne by the company** and maybe

¹ See for example Kralj, C. *et al.* (2018): "Healthy ageing. A systematic review of risk factors" In: King's Global Health Institute Reports. Research Report 2018(1), King's College London. This article presents outcomes of the ATHLOS project funded under Horizon 2020.





be eligible to favourable tax treatment of employers. Learning accounts should allow to save credits every year **for training purposes that the employee can freely chose**, e.g. also in case she or he wants to entirely reorient himself/herself into another sector of activity. Any type of activity should generate credits in the individual learning account. For example, volunteer management positions in larger non-profit organisations could also give rights to learning credits, as is the case in France.

The success of the individual learning account is **linked to the ability for employees to take paid educational leave**, otherwise some categories of learners who will not be able to make time for education and training (e.g. family responsibilities) will not be reached.

A **European** initiative is justified mainly if it provides for **cross-border recognition of training entitlements and of trainings**, otherwise it will lose a lot of its sense. This may help learners in transborder regions, but also learners from smaller member States who might not find adequate training in their member State but want to redeem their learning credits in another one. If the regulation is too minimal, individual learning accounts would not provide for quality assurance, validation of all forms of learning or mutual recognition, therefore this should be explicitly included.

The **use of EU funds**, particularly the Just Transition Fund, the European Social Fund, the Cohesion Fund or the Globalisation Adjustment Fund, is relevant to the development of life-long learning opportunities within the framework that will be proposed; however, in the longer run, **such offers should be self-sustaining financially** through employers' and public contributions towards the individual learning accounts.

Voucher systems are good complements to individual learning accounts for specific objectives and learning needs (e.g. sponsor a jobseekers' learning in an area that forms a particular barrier for him/her to access employment). However, the individual learning accounts system should remain free for the individual to spend on the workers' own objectives, as long as a training is recognised by meeting harmonised criteria.

Individual learning accounts will of course increase incentives and motivation to engage in life-long learning; however, the account is not self-sufficient: it needs to be adequately funded, adequate learning offers should exist and without a too high individual cost, and time must be available to engage in learning.

In a life-span perspective, it is important **that credits remain valid even after reaching retirement age**: persons who did not have the opportunity to redeem their credits should be enabled and encouraged to do so even as they have left the labour market.



Initiative on micro-credentials for life-long learning

An **EU initiative will allow for wider acceptance of micro-credentials** by employers, education providers and national authorities, but also provide an additional incentive and awareness-raising for the availability of learning opportunities to all.

Quality standards and taking non-formal and informal learning seriously is important, as outlined in our contributions on life-long learning beforehand.

Asides the digital and green transitions, highlighted in the introductory text, **the demographic transition also means that life-long learning becomes more important**, as careers become potentially longer. Short learning courses are more compatible with the needs of individuals who already have built a first career and want or need to reorient themselves.

The planned initiative on micro-credentials usefully complements the one on individual learning accounts, as **mutual recognition of entitlements, learning opportunities and outcomes stands and falls with the acceptance of the credentials by employers and learning institutions**, ideally also in other member states.

Micro-credentials **should ideally be given automatically upon the completion of a learning opportunity**, without any extra cost for the learner (just like Europass supplements for university degrees, for example).

Quality criteria should be oriented by the process of the learning experience (who is involved in setting learning outcomes and evaluation criteria, as well as the form of providing learning).

Online platforms and digitalisation are an important innovation in the field of life-long learning and can enable **learning by many individuals who previously had no access**, such as for reasons of time, geographic mobility and even funding. However, online platforms should not be overemphasised, as **a key driver in learning is also the collective experience and the building of new networks**. Funding, quality criteria and other measures introduced should target all forms of learning, online and offline.

Credentials should be output-oriented, i.e. **which new competencies has the learner acquired**, rather than process-oriented (outlining how many hours or how much work was involved). This approach is also more useful if the micro-credentials framework is **to be used for the validation and certification of skill acquired** outside of formal learning.

While a quality framework is important to build trust into the quality of certifications and the underlying skills, this **framework should be flexible enough to allow for the rapid inclusion of new skills** that are just emerging because of technological or



societal developments. Creating new learning offers on new contents should not be a too bureaucratic process and available for instance to non-profit actors on local level.

Conclusion

The planned initiatives are important contributions in realising the first Principle of the European Pillar of Social Rights, responding to the challenges posed by demographic change and the transition to a life-long learning society. They will most probably not reduce all barriers or solve all problems in access to learning, but they can be a major stepping stone towards a more inclusive learning culture. The symbolism of having EU-wide recognised entitlements and credentials for learning is important; it should be avoided that recognition of these are too high of an administrative burden. The Bologna process, introduced European Credits for higher education and harmonised diploma levels, but stopped short of automatic recognition of diplomas by member States, subjecting jobseekers still to lengthy and complicated recognition procedures. Such a situation is not understood by learners who feel they have acquired European credits and special attention should be put to avoid such a situation with the present initiatives.

AGE again underlines the importance of not limiting these initiatives to labour market age: employment, the will and the necessity to learn can go way beyond statutory retirement age and to reap the full benefits of such a system, it needs to avoid age discrimination by refraining to set direct and indirect age limits to the measures, in accordance with EU Directive 2000/78/EC.

<https://ec.europa.eu/eusurvey/runner/0031eb07-878e-46da-ae89-93731542bfaf>

