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Date: 15/07/2021 12:34:24

Slovak

Initiative on individual learning accounts

Fields marked with * are mandatory.	
1	
Introduction	
2 About you	
*2.1 Language of my contribution	
Bulgarian	
© Croatian	
Czech	
Danish	
Dutch	
English	
Estonian	
Finnish	
French	
German	
Greek	
Hungarian	
Irish	
Italian	
Latvian	
Lithuanian	
Maltese	
Polish	
Portuguese	
Romanian	

Slovenian	
Spanish	
Swedish	
2.2 I am giving my contribution as	
Academic/research institution	
Business association	
Company/business organisation	
Consumer organisation	
EU citizen	
Environmental organisation	
Non-EU citizen	
Non-governmental organisation (NGO)	
Public authority	
Trade union	
Other	
2.3 First name	_
Philippe	
2.4 Surname	
SEIDEL Leroy	
2.5 Email (this won't be published)	_
philippe.seidel@age-platform.eu	
2.0 Organisation name	
2.9 Organisation name 255 character(s) maximum	
AGE Platform Europe	
10 Organization size	
2.10 Organisation size	
Micro (1 to 9 employees)	
Small (10 to 49 employees)	
Medium (50 to 249 employees)	

Large (250 or more)

2.11 Transparency register number

255 character(s) maximum

Check if your organisation is on the <u>transparency register</u>. It's a voluntary database for organisations seeking to influence EU decision-making.

16549972091-86			

*2.12 Country	of	origin
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Plea	se add your country of orig	jin,	or that of your organisation	on.			
0	Afghanistan	0	Djibouti		Libya		Saint Martin
0	Åland Islands	0	Dominica	0	Liechtenstein	0	Saint Pierre and Miquelon
0	Albania	0	Dominican Republic	0	Lithuania	0	Saint Vincent and the
6							Grenadines
0	Algeria	0	Ecuador	0	Luxembourg	0	Samoa
0	American Samoa	0	Egypt	(C)	Macau	(C)	San Marino
0	Andorra	0	El Salvador	0	Madagascar	0	São Tomé and Príncipe
0	Angola	0	Equatorial Guinea		Malawi	0	Saudi Arabia
0	Anguilla		Eritrea		Malaysia		Senegal
0	Antarctica		Estonia		Maldives	0	Serbia
6	Antigua and Barbuda		Eswatini	0	Mali	0	Seychelles
0	Argentina		Ethiopia		Malta		Sierra Leone
0	Armenia	0	Falkland Islands	0	Marshall Islands	0	Singapore
0	Aruba	0	Faroe Islands		Martinique		Sint Maarten
0	Australia		Fiji		Mauritania		Slovakia
0	Austria		Finland		Mauritius		Slovenia
0	Azerbaijan	0	France	0	Mayotte	0	Solomon Islands
0	Bahamas	0	French Guiana		Mexico	0	Somalia

Bahrain	French Polynesia	Micronesia	South Africa
Bangladesh	French Southern and Antarctic Lands	Moldova	South Georgia and the South Sandwich Islands
Barbados	Gabon	Monaco	South Korea
Belarus	Georgia	Mongolia	South Sudan
Belgium	Germany	Montenegro	Spain
Belize	Ghana	Montserrat	Sri Lanka
Benin	Gibraltar	Morocco	Sudan
Bermuda	Greece	Mozambique	Suriname
Bhutan	Greenland	Myanmar	Svalbard and
		/Burma	Jan Mayen
Bolivia	Grenada	Namibia	Sweden
Bonaire SaintEustatius andSaba	Guadeloupe	Nauru	Switzerland
Bosnia and Herzegovina	Guam	Nepal	Syria
Botswana	Guatemala	Netherlands	Taiwan
Bouvet Island	Guernsey	New Caledonia	Tajikistan
Brazil	Guinea	New Zealand	Tanzania
British Indian Ocean Territory	Guinea-Bissau	Nicaragua	Thailand
British Virgin Islands	Guyana	Niger	The Gambia
Brunei	Haiti	Nigeria	Timor-Leste
Bulgaria	Heard Island and McDonald Islands	Niue Niue	Togo
Burkina Faso	Honduras	Norfolk Island	Tokelau
Burundi	Hong Kong	NorthernMariana Islands	Tonga

Cambodia	Hungary	North Korea	Trinidad and Tobago
Cameroon	Iceland	North Macedonia	Tunisia
Canada	India	Norway	Turkey
Cape Verde	Indonesia	Oman	Turkmenistan
Cayman Islands	Iran	Pakistan	Turks and
•			Caicos Islands
Central AfricanRepublic	Iraq	Palau	Tuvalu
Chad	Ireland	Palestine	Uganda
Chile	Isle of Man	Panama	Ukraine
China	Israel	Papua New	United Arab
		Guinea	Emirates
Christmas	Italy	Paraguay	United
Island			Kingdom
Clipperton	Jamaica	Peru	United States
Cocos (Keeling)	Japan	Philippines	United States
Islands			Minor Outlying
			Islands
Colombia	Jersey	Pitcairn Islands	Uruguay
Comoros	Jordan	Poland	US Virgin
			Islands
Congo	Kazakhstan	Portugal	Uzbekistan
Cook Islands	Kenya	Puerto Rico	Vanuatu
Costa Rica	Kiribati	Qatar	Vatican City
Côte d'Ivoire	Kosovo	Réunion	Venezuela
Croatia	Kuwait	Romania	Vietnam
Cuba	Kyrgyzstan	Russia	Wallis and
			Futuna
Curação		(60)	
3	Laos	Rwanda	Western
•			Sahara
Cyprus	LaosLatvia	RwandaSaintBarthélemy	

Czechia Czechia	Lebanon	Saint Helena	Zambia
		Ascension and	
		Tristan da	
		Cunha	
Democratic	Lesotho	Saint Kitts and	Zimbabwe
Republic of the		Nevis	
Congo			
Denmark	Liberia	Saint Lucia	

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. Fo r the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

*2.14 Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the personal data protection provisions

3 Additional information about you

3.2 What is your organisation's primary role in training?

- Company providing training for its employees Education and training provider Accreditation or certification body/ provider of quality assurance Public or private employment services providing information, advice, guidance or training
 - National or regional organisation with responsibilities for adult learning and training (including the funding of training)
 - Other role in training

3.3 Please specify

AGE members on national level have responsibilities for adult learning, including training and counselling for older jobseekers, third-age universities and other educational offers for older persons.

4 Problem Definition

In this section, we would like to gather your views about the main barriers that prevent individuals from accessing training.

4.1 To what extent do you agree or disagree that following factors related to costs prevent individuals from accessing training?

	Fully agree	Somewhat agree	Somewhat disagree	Fully disagree	l don't know
* Direct cost of training (course fees, tuition)	0	•	0	0	0
* Indirect cost of training (loss of income due to time taken up by training)	•	0	0	0	0
* Insufficient awareness of available financial support for training	•	0	0	0	0

4.2 To what extent do you agree or disagree that following factors related to incentives and motivation prevent individuals from accessing training?

	Fully agree	Somewhat agree	Somewhat disagree	Fully disagree	l don't know
* Insufficient awareness of the benefits of training	0	•	0	0	0
* Uncertainty about which skills are needed to improve employment and income prospects	0	•	0	0	0

* Fragmented/ insufficiently transparent information on available training opportunities	•	0	0	©	0
* Uncertainty about the quality of training opportunities	0	•	0	0	0
* Uncertainty about whether training outcomes will be recognised by employers	•	0	0	0	0
* Insufficient tailoring of available training to individual needs	•	0	0	0	0

4.3 To what extent do you agree or disagree that following factors **related to time** prevent individuals from accessing training?

	Fully agree	Somewhat agree	Somewhat disagree	Fully disagree	l don't know
* Lack of time (including work, family and other commitments)	•	0	0	0	0
* Inflexibility of training time (when training can be undertaken)	0	•	0	0	0

4.4 To what extent do you agree or disagree that the following factors are **obstacle** s to a higher training provision on the labour market?

	Fully agree	Somewhat agree	Somewhat disagree	Fully disagree	l don't know
* Employer's fear to lose a worker once he or she has acquired better skills	0	•	0	0	0
* A lack of instruments for an effective sharing of training costs (between companies, individuals, public authorities)	•	0	0	0	0
* A lack of capacity by small, medium and micro-enterprises to organise training for their employees	•	0	0	0	0
* A lack of support for workers with no links, or lose links, to an employer (i.e. atypical workers such as platform workers)	•	0	0	0	0

4.5 In your opinion, are there **other important barriers** to training participation or provision not previously mentioned? You can also use this space to elaborate on a previous answer:

Question 4.3: employers' inflexibility for making time and funding available for life-long learning and training
are an obstacle.

5 Need for EU action and policy objectives

5.1 To what extent do you agree or disagree that a European initiative on individual learning accounts could **add value on the following topics?**

	Fully agree	Somewhat agree	Somewhat disagree	Fully disagree	l don't know
* Increased transparency about national training markets for companies operating on the single market	0	•	0	0	0
* Portability and recognition of training outcomes across Member States	0	•	0	0	0
* Portability of training entitlements across Member States	•	0	0	0	0
* More efficient use of EU funds for skills development	•	0	0	0	0
* Development of registries of quality- assured training opportunities at national level	•	0	0	0	©
* Implementation of quality assurance also for non-formal training opportunities	•	0	0	0	0
* Validation of non-formal and informal learning outcomes	0	•	0	0	0
* Provision of career guidance	•	0	0	0	0
* Provision of educational leave and its take- up by individuals	•	0	0	0	0
* Other topic	0	0	0	0	•

5.2 Please explain

500 character(s) maximum

It would give life to EPSR principle 1 and build a life-long learning culture. Furthermore, it would give access to many more learning opportunities to learners especially in small member States. It will also be an opportunity to give access to learning to persons who might not be able to consider it otherwise because of constraints of funding, time or distance from education.

5.3 To what extent do you agree or disagree that additional policy efforts are needed to support the following types of learning among adults?

	Fully agree	Somewhat agree	Somewhat disagree	Fully disagree	l don't know
* Short job-related training (e.g. for training within the current job)	0	•	0	0	0
* More fundamental job-related training (e.g. for a professional transition)	•	0	0	0	0
* Training in general transversal skills (basic skills, soft and inter-personal skills etc.)	0	•	0	0	0
* Training in digital skills	•	0	0	0	0
* Training in skills relevant for the green transition (i.e. skills required in sectors that are growing as economies become more environmentally sustainable)	•	0	0	0	0
* Non job-related learning	•	0	0	0	0
* Other types	0	0	0	0	•

5.4 Please explain

500 character(s) maximum

AGE has repeatedly pointed out that learning and skills policies often wrongly focus on people active in the labour market only. Non-job-related learning can bring huge benefits for job-related tasks (multitasking, self-confidence etc.) and should be fostered, just as learning of job-related skills should be allowed to people no longer active in the labour market – because they could be empowered to actually re-enter.

6 Policy Options

In this section we would like to have your views on **possible building blocks** of policies to ensure that all people have the opportunity to keep building skills throughout their working life, including on individual learning accounts and other forms of providing individual training entitlements.

The European Commission's working definition of "**individual learning account**" is as follows: a personal account where individual training entitlements can be accumulated over time, possibly funded by different sponsors. Training entitlements from the account can be spent on training independent of the employment status and when requested by the individual.

The working definition of "**individual training entitlement**" is as follows: a personal budget to spend on training. Also guidance and validation offers may be eligible for funding from this budget.

We will ask for your views on the **effectiveness of the different building blocks** for addressing the three **main groups of barriers to training introduced in section 4:** costs/financial constraints, incentives and motivation and a lack of time.

6.1 To what extent do you agree or disagree that the following approaches are effective for **tackling the financial constraints** influencing participation in training?

	Fully agree	Somewhat agree	Somewhat disagree	Fully disagree	l don't know
* Establish individual learning accounts	•	0	0	0	0
* Establish individual training entitlements in other forms (training vouchers, individual budgets etc.)	0	•	0	0	0
* Tax incentives for individuals	0	•	0	0	0
* Tax incentives for companies	•	0	0	0	0
* Subsidies to education and training providers	•	0	0	0	0
* Increase overall public funding available to support training (i.e., sum of funding provided to individuals, companies and education & training providers)	0	•	0	0	0
* Facilitate the sharing of training costs between companies, public authorities and individuals	•	0	0	0	0
* Other approach	•	0	0	0	0

6.2 Please explain

500 character(s) maximum

Combine individual learning accounts, which are credited by employers and other sponsors such as public employment services, with a right to educational leave for realising these credits (leave being able to be taken from employment or job-search on a full-time or part-time basis).

The value of individual learning accounts lies with the fact that it enables learners to engage in learning; having them bear the cost for it individually would miss the point of the initiative.

6.3 To what extent do you agree or disagree that the following approaches are effective **for increasing incentives and motivation** influencing participation in training?

	Fully agree	Somewhat agree	Somewhat disagree	Fully disagree	l don't know
* Establish individual learning accounts	0	•	0	0	0
* Establish individual training entitlements in other forms (training vouchers, individual budgets etc.)	0	•	0	0	0
 Public registry of quality-assured training opportunities 	•	0	0	0	0
* "One stop shop" digital platform and smartphone app that link a registry of quality training opportunities to financial support	•	0	0	0	0
* Publication of training course evaluations of past participants in the registry of quality-assured training opportunities	•	0	0	0	0
* Tax incentives for individuals	0	•	0	0	0
* Tax incentives for companies	•	0	0	0	0
* Subsidies to education and training providers	•	0	0	0	0
* Awareness raising campaigns	•	0	0	0	0
* In-person advice and guidance on training opportunities	•	0	0	0	0
* Opportunities for the validation of informal and non-formal learning outcomes	•	0	0	0	0
* Increase modularisation of the training offer (opportunities to acquire a certification on completion of short courses)	0	•	0	0	0
* Other approach	•	0	0	0	0

6.4 Please explain

500 character(s) maximum

Introduce an actual entitlement to realise the right to learning via educational leave	

6.5 To what extent do you agree or disagree that the following approaches are effective **for helping to address time constraints** to participation in training?

	Fully agree	Somewhat agree	Somewhat disagree	Fully disagree	l don't know
* Establish individual learning accounts	0	•	0	0	0
* Establish individual training entitlements in other forms (training vouchers, individual budgets etc.)	0	•	0	0	0
* Increase modularisation of the training offer (opportunities to acquire a certification on completion of short courses)	•	0	•	0	•
* Paid educational leave (granted by employer for employees)	•	0	0	©	0
* Allowance to cover the costs of living during training (open also to non-employees)	•	0	0	0	0
* Other approach	0	0	0	0	•

6.6 Please explain

500	character(s) maximum			

6.7 To what extent do you agree or disagree with the following options for **targeting individual training entitlements?**

	Fully agree	Somewhat agree	Somewhat disagree	Fully disagree	l don't know
* Universal support: Give training entitlements to all working-age individuals, no matter their current position on the labour market	0	•	•	0	0
*					

Universal, but differentiated support: Give training entitlements to all workingage individuals, and a higher amount to individuals with particular training needs	•	©	©	•	0
* Targeted support: Give training entitlements only to individuals with particular training needs (such as those in industries undergoing significant structural change, the unemployed, atypical workers or the low-qualified)	•	•	•	•	•
* Other approach	0	0	0	0	•

6.8 Please explain

500 character(s) maximum

A universal approach that gives entitlements (eventually subject to a certain vetting period in work) to individuals of all ages, including beyond working age, would be the most preferrable option. Targeted entitlements can complement this approach where needs are higher because of expected technological or other transitions in certain sectors.

6.9 Giving individuals training entitlements goes hand-in-hand with the establishment of a **registry of training opportunities that are eligible** for funding from these training entitlements. To what extent do you agree or disagree with the following statements about the selection of eligible training opportunities/the **govern ance of this registry?**

	Fully agree	Somewhat agree	Somewhat disagree	Fully disagree	l don't know
* Strong role of employer organisations	•	0	0	0	0
* Strong role of trade unions	•	0	0	0	0
* Strong role of public authorities	•	0	0	0	0
* Strong role of skills intelligence/ research (information on skills in shortage on the labour market)	•	0	0	0	0
* Other	•	0	0	0	0

6.10 Please explain

500 character(s) maximum

Strong role of individual learners (also those not active on the labour market) in the governance

6.11 To what extent do you agree or disagree with the following possible **rules on** how individuals can spend their individual training entitlements?

	Fully agree	Somewhat agree	Somewhat disagree	Fully disagree	l don't know
* Free selection from the registry of eligible training offers. For employees, training may take place during working hours with the agreement of the employer	•	0	0	0	0
* Free selection from the registry of eligible training offers. For employees, training is required to take place outside of working hours	0	0	•	0	0
* Restricted freedom in selection of training on the basis of compulsory prior guidance (e.g. by Public Employment Services)	0	•	0	0	0
* Other	0	0	0	0	•

6.12 Please explain

500 character(s) maximum

Training must be independent from the individual employer because it can also be involved in changing career paths

Compulsory guidance can help to better target effective training units.

If training is only to take place outside of working hours, certain learners will be excluded from benefitting from the learning, for example workers with family responsibilities

6.13 To what extent do you agree or disagree that the following **sources should** be used to increase available funding for training?

	Fully agree	Somewhat agree	Somewhat disagree	Fully disagree	l don't know
* Individual contribution	0	•	0	0	0
* Employer's levy (e.g. on payroll)	•	0	0	0	0
* Member States public funding	•	0	0	0	0
* EU funds (including the European Social Fund, Recovery Funds etc.)	0	•	0	0	0
* Other	0	0	0	0	•

	Fully agree	Somewhat agree	Somewhat disagree	Fully disagree	l don't know
* No additional instrument, the existing EU- level framework is sufficient	0	0	0	•	0
* Strengthen EU level monitoring and exchange of best practices (e.g. European Semester, Open Method of Coordination)	0	•	0	0	0
 Introduce EU legislation to be adhered by Member States on a voluntary basis (e.g. Council Recommendation) 	•	0	0	0	0
* Other instrument	•	0	0	0	0
6 Please explain 00 character(s) maximum					

initiative. The specific content of the initiative will depend on the impact assessment and stakeholder consultations, and possible recommendations would concern the building blocks covered in the previous

ndamental and social rights could result from an EU initiative on individual

7.1 To what extent do you agree or disagree that the following impacts related to fu

6.14 Please explain

500 character(s) maximum

sections of this questionnaire.

learning accounts?

16

	Fully agree	Somewhat agree	Somewhat disagree	Fully disagree	l don't know
* Making it easier for individuals to manage transitions in the labour market (between different jobs or sectors, or from unemployment to employment)	•	0	•	0	•
* Improving employment prospects for unemployed by tailor made assistance	•	0	0	0	0
* Improving access to secure and adaptable employment regardless of the type and duration of the employment relationship	•	0	0	0	0
* Tackling discriminations on all grounds regarding access to training, employment prospects and career progression	0	•	0	0	0
* Improving health and wellbeing	0	0	0	0	0
* Promoting active citizenship and political participation	0	•	0	0	0

7.2 To what extent do you agree or disagree that the following impacts related to the **labour market and the economy** could result from an EU initiative on individual learning accounts?

	Fully agree	Somewhat agree	Somewhat disagree	Fully disagree	l don't know
* Supporting an efficient reallocation of labour in light of structural changes or economic downturns	•	0	0	0	0
* Reducing skills gaps and mismatches	•	0	0	0	0
* Improving productivity and competitiveness of companies	•	0	0	0	0
* Supporting geographical labour mobility	0	•	0	0	0

7.3 To what extent do you agree or disagree that the following impacts related to the **society and the environment** could result from an EU initiative on individual learning accounts?

	Fully agree	Somewhat agree	Somewhat disagree	Fully disagree	l don't know
*					

Supporting digital and green transitions by providing relevant skills	•	0	0	0	0
* Improving cohesion in society	•	0	0	0	0
* Leading to upward convergence between Member States	•	0	0	0	0

7.4 Are there any other expected impacts – positive or negative - you would like to indicate?

500 character(s) maximum

Enable longer working lives and reduce age discrimination in the labour market

Promote active ageing also beyond working life, with the associated benefits on creating societal value and increasing health, having both a positive knock-on effect also on public finances.

8 Concluding Questions

8.1 If you have any additional comments and/or suggestions, feel free to use the open answer box below

1500 character(s) maximum

The micro-credentials initiative relevance is highly interrelated with the planned initiative on individual learning accounts – to give access to learning – as well as with the creation of an EU framework for paid educational leave and access to guidance which is independent from the employer and available to all. The task is challenging as even where life-long learning accounts exist on national level, they are not necessarily interlinked and the way they are credited is not uniform; AGE members have witnessed that they lost entitlements when transitioning from one type of account to another one, others have noticed that credits which they had a right to (in France, you can earn credits because you have a management function in a larger association, even when volunteering - credits which were lacking when our member checked his account).

Credits on life-long learning accounts should not expire with reaching statutory retirement age, in accordance with EU Directive 2000/78/EC, but remain valid for those who have not had the possibility to redeem their entitlements before leaving the labour market.

8.2 If you wish to upload position papers please do so here

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

f596a6bf-93db-4f76-a05b-d013d759f0e6/AGE_Position_on_life-long_learning_consultations_2021.pdf

Contact

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