The European Union has put forward some serious ambitions in the field of education and training, particularly with regard to upskilling and reskilling the European adult population for the Twin Transitions, aiming to achieve a target of 60% of adults in education or training by 2030 (European Pillar of Social Rights Action Plan). Two major tools are being proposed to achieve this endeavour: individual learning accounts, and micro-credentials. Following a two year process of consultations with experts, stakeholders and Member States, on 10 December the European Commission published its Proposals for Council Recommendations on Individual Learning Accounts and for a European Approach to Micro-credentials.

The Lifelong Learning Platform - European Civil Society for Education welcomes the European ambition to foster lifelong learning through these two new initiatives that can pave the way to broadening access to learning opportunities for all. The synergies between the two proposals are numerous and promising, however, these will depend on their implementation at national and institutional level.

As stated in our public consultation response to the Individual Learning Accounts (ILAs), we believe that individuals (learners) should have full ownership over their accounts, which we are pleased to see reflected in the final Commission proposal. **We support a universal but differentiated approach** to the ILAs, as everybody should benefit from an entitlement to learn, but targeted support is needed for those individuals who are underrepresented in learning and who usually have low skills. Equally valuable and aligned with our wishes is the portability and transferability of ILAs across Member States which has been considered in the proposal and has a strong potential to encourage further learning mobility for all, therefore, ensuring a European dimension.

**ADDRESSING THE MOTIVATION AND OUTREACH CHALLENGES**

Related to the issue of engaging and motivating marginalised adults in lifelong learning, we are glad to see that the involvement of a wide range of stakeholders has been considered in the Proposal - such as civil society organisations and/or community actors as we have often reiterated that these organisations can sometimes be best placed to reach them. **Outreach and motivation** are two key issues that if not addressed adequately by the Member States will not improve the uptake of education and training to the levels required in today’s societies.

The sole fact that a training offer is available does not necessarily guarantee the motivation to learn or access to the training for that matter. We know that the biggest obstacle to taking up learning is motivation to learn, as for many individuals the value of learning remains out of sight often due to social and/or economic constraints. A culture shift towards learning is required and resources must be put into: **lifelong learning guidance** (beyond career guidance) both online and offline that are closer to those in need, **community-based learning** (see for instance our joint paper with Cedefop), and in the different richness of learning environments so as to **diversify the type of offer and its providers to learners’ need**.

**VALUING AND VALIDATING ALL TYPES OF PRIOR LEARNING BEYOND LABOUR MARKET NEEDS**

We are pleased to see the Commission stressing the importance of **validation and recognition** mechanisms. We emphasise however that in both rhetoric and practice, the Commission’s proposal requires a **shift towards a lifelong learning paradigm** where supporting the individual’s potential is the key guiding principle. This means that individuals have the freedom to choose training of their choice, whether related to specific labour market needs or not; and that **equal recognition and value for all types of learning environments** (formal, non-formal, informal) is ensured as well as the possibility to move seamlessly between them. **(LLLPl, 21st Century Learning Environments)**. All learning is valuable for a prosperous and just society.

Economic driven policies, while predominantly
emphasising labour market needs in terms of skills, must consider and equally value skills that empower all citizens to fully engage in society. It is our position that an over-emphasis on the labour-market needs of individual learning accounts pre-empts a missed opportunity to consolidate and proliferate a culture of lifelong learning across Europe where broad adult participation becomes the norm.

**SKILLS FOR LIFE AND TRANSVERSAL SKILLS NEEDED FOR A JUST TWIN TRANSITION**

We undoubtedly need such a shift to improve participation in democracy, resilience, personal wellbeing, among other challenges our populations face. This applies in particular to the digital and green transitions - where a culture change is necessary and learning can be a vehicle to support a smooth and just transition for all. To this end, we encourage Member States to not limit ILAs to labour-market related learning solely, but extend it to encompass learning skills for life and transversal skills - which include emotional and social skills more and more needed in our contemporary societies - as well as learning for the joy of learning. We also strongly encourage Member States to extend ILAs beyond the work-force and/or employment status.

**ENSURING QUALITY LEARNING OFFER FOR ALL**

Quality and accessibility of the offer are crucial aspects that we strongly call on the European Commission and Member States to consider by paying extra attention on the transparency, quality of the learning offer and accreditation process. In most Member States the training offer is very fragmented, lacks quality controlling mechanisms while also being financially expensive ensuring that the offer remains based on purchasing power as opposed to need. Quality assurance mechanisms must be adequately put in place and / or adapted to support its implementation.

When considering the quality of the learning offer, we wish to point out the danger of tokenism that can arise when a market-driven access to learning is fostered. Learning must remain a meaningful experience which individuals pursue for the sake of learning and not to just tick a box. Remaining wary of this can ensure that the training offered entails actual learning outcomes, sustained motivation and quality education.

**TRUE PUBLIC INVESTMENT IS KEY TO ILAS IMPLEMENTATION**

Funding of Individual Learning Accounts will certainly be one of the main difficulties Member States will be faced with. However, we believe that there are good examples and promising outcomes of public expenditure for similar mechanisms that can serve as an inspiration. We must ensure enough public investment for ILAs for the initiative to be a truly inclusive one offering lifelong learning opportunities for all. Private actors have a key role to play in this driven by their social mission vs for-profit interest. To this end, European, national, regional and local investment must be aligned and work in complementarity with public and private stakeholders to ensure an equally accessible public offer.

**Micro-credentials: broadening learning opportunities for lifelong learning and employability**

We welcome a European approach to micro-credentials and as stated in our public consultation response we believe that this initiative can foster lifelong learning and see the synergies between individual learning accounts and micro-credentials as key to supporting the broadening of learning opportunities. However, similar synergies should be built with other EU and national existing and ongoing initiatives such as the European Higher Education Strategy, the European Education Area to name but a few.

**AN OPPORTUNITY FOR ALL EDUCATION AND TRAINING PROVIDERS**

Similarly to the ILAs, our concerns also apply to the Commission Proposal for Micro-credentials. This includes the strong emphasis placed on higher education and VET that carries with it the idea that universities as tertiary education providers should tap into new markets following a supply model; this conceals a vision of higher-education institutions as market-driven organisations, whereas education should be wholly disjointed to market drivers. While higher education institutions have a key role to play and must extend their learning offer and improve accessibility to a more diverse learners population to become more inclusive and support societal challenges, this must not be seen as the only alternative for new learners to undertake new learning opportunities. Additionally, this must support synergies and cooperation between different education and training providers.

**FLEXIBLE LEARNING PATHWAYS AND PERSONALISED LEARNING FOR ALL**

At the Lifelong Learning Platform we believe that MCs could boost access and participation to lifelong learning by bringing more flexibility to the learning pathways and greater opportunities for personalised learning owing to the modular approach and the portability of credits. However, we stress that certain conditions have
to be met and encourage more cross fertilisation among different learning providers and education levels. For example better cooperation with non-formal education providers and/or with adult education and professional education providers. Overall we wish to stress that this should not be seen as a way out of continuing public funding to higher education.

**LEARNER-CENTRED APPROACH: LEARNERS NEEDS FIRST**

Learners must be central to the initiative. To this end, it is of utmost importance that the development of micro-credentials adopts a **learner-centred approach**. MCs must clearly state the value of the certificates and should be seen as complementary to larger scale quality educational programmes of a longer duration— not replacing them. We should leverage how micro-credentials could also serve as a **tool for the recognition and valorisation** of the entirety of knowledge, skills and competencies acquired by learners outside the formal education system.

**PUBLIC PROVISION OF THE LEARNING OFFER TO ENSURE INCLUSIVENESS**

Lastly, we wish to see stringent conditions applied to private providers and **support to publicly-funded providers**. We must also acknowledge the fact that micro-credentials could potentially disrupt the governance system in which education systems operate (particularly public institutions), and thus the Commission should provide clear and strong guidance to Member States to develop a system which **prioritises the public offer** and has learners’ needs at the centre while calls for private contribution to top up and support its access to all.

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**ANNEX: SOME EXISTING REACTIONS AND STATEMENTS ON THE TOPIC**

- All Digital, Position on the proposed council recommendation on micro-credentials (2022)
- All Digital, Position on the proposed council recommendation on individual learning accounts (2022)
- Solidar Foundation, Individual Learning Accounts Briefing note (2021)
- EAEA, Contribution to the public consultation on Individual Learning Accounts (2021)
- EURASHE, Statement within the European Public Consultation on Micro-credentials (2021)
- Dlearn, Article on A New Age of Educational Credentials with a focus on Micro-credentials (2021)
- LLLP, Reaction to the EU Pillar of Social Rights Action Plan (2021)