



Contribution to the public consultation on Individual Learning Accounts by the European Association for the Education of Adults (EAEA)

July 2021

EAEA welcomes the consultation launched by the European Commission and hopes that the voice of adult learning and education (ALE) – civil society, providers and learners – will be taken into account.

In order for Europe to recover after Covid19, it is necessary that all the instruments of adult learning and education support the development of life skills, lifelong learning skills and basic skills – not only skills for jobs. That should be the approach of Individual Learning Accounts, too.

As it is quite difficult to find an overall European assessment for ILAs, the responses of our members have been very diverse and depend on the current national or regional situations of policy frameworks, financing and infrastructure for ALE. We have asked our members to individually submit contributions to your call so that this diversity becomes more visible and understandable. We have also called on our members from outside of the EU to participate as innovative approaches can enrich the development of adult learning and education systems wherever in Europe.

As EAEA, we want to highlight the key pros and cons as well as the recommendations that have come out of discussions in the EAEA membership and with experts.

Advantages of ILAs

- **They constitute an entitlement** and right to adult education and therefore empower the (potential) learner and support a learner-centred approach.
- **ILAs are a financing instrument** that can be crucial in countries where there is little to no funding for adult education.
- **ILAs have the potential to increase participation in lifelong learning.**
- **If done right, ILAs can support accreditation and quality monitoring processes.**

Disadvantages of ILAs

- They could broaden the learning gap by strengthening the participation of already active and more highly-skilled learners rather than targeting everyone and lowering the threshold especially for people who are normally not participating in learning activities.
- ILAs can be prone to fraud if no sufficient or appropriate control mechanisms are in place.
- They could be used to replace already existing and well-functioning funding instruments, and undermine the current provision and structure of general ALE.
- ILAs could shift the viewed responsibility to initiate and uphold learning activities towards the individual.
- The use of ILA schemes might lead to highly bureaucratic systems, as they require a certain standard of quality assurance and auditing

Recommendations

In order to ensure that ILAs have a positive impact, the EAEA and its members recommend the following:

- **The definitions of ILAs, their tools and goals should be clear and European-wide from the very start:** do they, for example, include or consist of training vouchers? An agreement between member states in this regard is essential.
- **ILAs need to take all forms and objectives of adult education into account:** formal and non-formal, general and vocational, for personal, professional, social and civic purposes. ILAs are often perceived solely as labour market instruments – we strongly disagree with this definition.
- **People should be able to access all forms of learning and at any age.** Learning in different areas is essential, eg computer courses for older people, health and well-being, exercise and social connections are all important parts of adult learning (the pandemic has clearly demonstrated this). Non-formal and leisure courses are often the pathway for vocational and/or formal learning – **we, therefore, insist that general adult education for everyone is a key part of ILAs.**
- ILAs need accompanying measures in order to be successful: low-threshold **guidance and information about learning opportunities are key requirements as well as sufficient and sustainable funding of the infrastructure of ALE providers, especially in regions with weak provider networks.**
- **Special emphasis** including outreach and more personalised guidance **is necessary to reach people with low basic skills and from vulnerable groups.**
- **Monitoring is essential:** unintended consequences can be recognised and rectified, and key performance indicators can help to define success and/or challenges.
- The development, implementation and monitoring of ILAs should happen in a multi-stakeholder approach.
- **The introduction of ILAs needs to be embedded in ALE systems so that it complements existing instruments.**
- **The need for quality assurance is self-evidently, but EAEA calls for careful consideration of the used criteria.** Adult learning and education often consists of smaller providers or NGOs who all do excellent work, but would not be able to go through a certification procedure such as ISO. Quality assurance needs to take the available size and resources of providers into account and adapt the criteria accordingly.
- ILAs can and should also be used for validation and **recognition of prior learning** and should be closely linked to portfolios and similar.
- **ILAs should not move all funding and/or responsibility to learn to the individual level.** In order to continue or introduce a good adult education system, resources for infrastructure, providers, staff etc. are still essential.

A European Approach?



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EAEA is currently doubtful about a possible European scheme for ILAs. While it is useful to introduce portability of education and training, there is the danger that ILAs, especially if not done right, might have a negative impact on general adult education. There are a number of issues that would have to be taken into consideration, such as:

- Do ILAs reinforce the 'split' between general and vocational adult education? (This split is very often artificial, for example considering language learning: how do you make a difference between professional and leisure purposes?)
- Will formal education be further advanced at the cost of non-formal learning?
- Do ILAs encourage the participation of vulnerable groups or not?
- Are all groups of society adequately targeted? Take, for example, people with disabilities, older people, stay-at-home carers etc.

In many countries, the adult education system is fragile and lacking funding, support and infrastructure, and this is especially true for general adult education. Any instruments that are introduced will have to assure that existing Adult Education and Learning structures are not weakened more than now and that functioning systems in other countries will not be undermined by new instruments.

EAEA is keen to support the European Commission in the reflections and elaboration of proposals of ILAs and calls on them to strengthen general as well as vocational Adult Learning and Education.

More information

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The European Association for the Education of Adults (EAEA) is the voice of non-formal adult education in Europe. EAEA is a European NGO with 120 member organisations in 40 countries and represents more than 60 million learners Europe-wide.

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