Individual Learning Accounts: How will ALE providers be supported?

July 2022

On 31 May 2022, the Council Recommendation on individual learning accounts was adopted. What does it hold in store for adult learning and education (ALE)? EAEA believes that there needs to be stronger support for the supply side of ALE, adequate quality assurance and a learner-centred approach.

EAEA welcomes the reference to the first principle of the European Pillar of Social Rights that states that

“everyone has the right to quality and inclusive education, training and lifelong learning in order to maintain and acquire skills that enable them to participate fully in society and manage successfully transitions in the labour market.”¹

The Council Recommendation also points out that

“Many adults, especially among the low-qualified and those furthest from the labour market, are not motivated to take up training. They may not be aware of their own skills needs, and may not know whether support and training are available, or are of good quality and are recognised in the labour market. Furthermore, people may not be motivated to engage in training that has been chosen without consulting them and is not tailored to their needs.”²

We welcome that Individual Learning Accounts are a right that individuals can bring to bear and that they are a funding tool for participation in ALE where there are few other funding opportunities for learners. In particular, we are also pleased that Individual Learning Accounts are transferable, even if the professional and personal situation of individuals changes. Moreover, we appreciate that the Council Recommendations make the link to guidance and validation opportunities and urge Member States to provide these services either free of charge or in the framework of their individual learning entitlements. If implemented well, Individual Learning Accounts have the potential to increase participation rates in ALE.

We, therefore, find it all the more regrettable that the Council Recommendation is explicitly aimed at the adult population of working age only. This could lead to a widening of the learning gap between those who are in the labour force and tend to be more highly educated and those who are not (yet) or no longer in the labour force. UNESCO’s GRALE 5 report³ shows that while there has been progress in

---

participation in adult learning, especially for women, those who need adult learning the most – disadvantaged and vulnerable groups such as indigenous learners, rural populations, migrants, older citizens, people with disabilities or prisoners – do not have adequate access to learning opportunities. The limitation to adults of working age reduces the opportunities for these target groups to be socially included and participate in society through learning. This also contradicts the principle of the European Pillar of Social Rights that everyone has the right to lifelong learning, and, at the same time, limits Individual Learning Accounts to a labour market tool.

The biggest concern for us, however, is that Individual Learning Accounts are being offered without clear support for the supply side. Especially where ALE organisations want to ensure greater provision and include more learners in their programmes, strong investment in ALE providers, organisations and structures is absolutely necessary.

ALE provision in Europe is very fragmented and, in many countries, lacks funding to support ALE governance structures and infrastructure. Consultations of EAEA members and the wider ALE community have suggested that a large part of ALE financing in Europe comes from project and programme funding, making financing models precarious. Any new funding instruments on the demand side of learning – in this case Individual Learning Accounts – need to be complemented by additional funding instruments on the supply side of ALE to avoid imbalances in the system and to assure that ALE structures are strong enough to deal with additional demand from learners.

We appreciate that the Council Recommendation promotes greater “cooperation between public authorities, social partners, civil society organisations and other stakeholders” (p. 11) for increased outreach and awareness-raising activities; however, cooperation alone will not be able to achieve the goal of the ILA’s to increase participation in ALE. Outreach work, counselling, guidance in validation, but, of course, also the provision of quality learning opportunities, require better and more sustainable funding for ALE infrastructures, the operational level and the training and professional development of ALE educators and staff.

It is also not clear what exactly is understood by “eligible training” as the definition of this will depend on the respective Member States. This opens the door for these to be learning opportunities that are very narrowly defined and technical rather than providing the opportunity for individuals to get on and choose their learning pathways. This is contrary to the Council Recommendation’s principle that individuals should be free to choose learning opportunities. We, therefore, urge Member States that civil society providers in ALE are included in the process to define eligible learning opportunities to ensure that learners have access to the full range of entry points into learning and transitions in learning.

The learners must be at the centre, and their voice must be heard when defining training needs in national or regional legislation for Individual Learning Accounts. These must not remain empty words, but must be translated into action: this requires direct consultation and including the voice of learners at the levels where policy decisions are made (national, regional or local, depending on national circumstances). Only when learners have a voice and get agency for their own learning

---

4 For instance in the Erasmus+ KA2 project FinALE - Financing Adult Learning in Europe: further information on https://eaea.org/project/financing-adult-learning-in-europe-finale/?pid=4575
pathways can learning actually be effective and meet learners' needs.

Additionally, the definition of eligible training can potentially lead to a division between learning considered valuable (and therefore eligible) and leisure-oriented (and therefore not eligible) although this is neither useful nor motivational for learners themselves. Evidence from our members (and their members providing learning opportunities at the grass-roots level) as well as recent projects that EAEA worked in – for instance, the Erasmus+ KA2 project MASTER (Measures for Adults to Support Transition to further Education and Re-skilling opportunities) – shows that for many learners, non-formal and leisure courses can be the gateway to vocational education and training or other forms of (formal) further education, to employment and community engagement⁵. For this reason, it is precisely such programmes that need special support in order to reach disadvantaged groups. Scientific research – both in the fields of adult education and psychology, as well as in economics – has also sufficiently proven over the past 20 years that soft skills, transversal skills, life skills and/or cross-cutting skills play a central role in the personal and professional development of adults, and that these need to be promoted in a complementary way to technical or “academic” skills⁶. Adults addressed by Individual Learning Accounts schemes should be able to access all forms of learning, including non-formal ALE.

We would like to note that there is already a rich high quality offer in non-formal ALE which, with more support, could offer even more adults the opportunity to learn and be part of society. We, therefore, strongly recommend building on existing offers – particularly in non-formal ALE – and making them ‘eligible’ to be included in the national registries of recognised training, rather than promoting the establishment of new commercial providers. In an unsuccessful – and very detrimental to the ALE landscape – attempt in the UK to introduce individual learning accounts in 2000 to 2001, the expectation that “market forces” would ensure quality, and that inefficient ALE providers would be replaced by new private (and thus supposedly more efficient and better) providers, turned out to be a big misassumption. Instead, many cases of abuse by private education providers occurred – favoured by the lack of quality assurance measures.⁷

Quality assurance must be a priority. However, we call for careful consideration of the used criteria for quality: ALE is, in many countries in Europe, mainly provided by small organisations and non-profit entities that deliver excellent results, but would not be able to go through a certification process such as ISO or similar standardisation systems, as these can be very demanding in terms of operational and financial resources that smaller organisations do not have. Attempts to introduce quality certification systems in some countries (e.g. Qualiopi in France) have effectively excluded many small structures from public funding for training provision, as only large structures have the capacity to go through certification processes. Quality assurance must take the available size and resources of providers into account and adapt the criteria accordingly. Furthermore, certification does not necessarily equal

---

⁵ Inspiring examples of learners can be found, for instance, on the YouTube channel of EAEA’s member Learning and Work Institute UK who organises an annual Festival of Learning in the UK: https://www.youtube.com/c/LearnWorkUK/videos
⁶ Searching for "life skills", "soft skills" etc. in "adult education" on Google Scholar yields tens of thousands of results.
good quality of learning provision, and not all certification methods fit the non-formal ALE sector that is characterised by being dynamic and oriented towards the needs of learners rather than specific curricula and learning outcomes.

We welcome that the Council Recommendation advocates for an enabling framework to act as a one-stop-shop where individuals can directly access their education account and the national registry of learning opportunities as well as paid educational leave. However, support mechanisms need to be created to help particularly disadvantaged target groups to access their individual learning account. Digital platforms risk excluding people with little or no digital skills and/or access to internet-enabled devices from information on ILA’s and learning opportunities.

Individual Learning Accounts should not lead to a situation where the responsibility for financing ALE is increasingly shifted to learners. **Existing funding opportunities must not be jeopardised under any circumstances, and additional support must be created for those who are off the grid in Individual Learning Accounts.** This includes all those that are not in the labour force or of working age; they have the same right to lifelong learning than anyone else and, therefore, need to be given equal access.

**To ensure that Individual Learning Accounts will be implemented successfully, we urge Member States:**

- To strongly invest in the supply side of adult learning and education, including in ALE providers and organisations to support operational capacity, professional development of staff, and infrastructure, to enable ALE structures to keep up with the additional demand through Individual Learning Accounts

- To strengthen ALE systems at the national, regional and local levels by giving ALE providers AND learners a voice in decision-making processes: they know best about learning needs of adults

- To build on existing ALE structures and to strengthen them as well as to develop and implement suitable quality assurance systems to guarantee high quality learning provision

- To use wide definitions of ‘eligible trainings’ that include non-formal learning programmes, such as ‘leisure courses’ (including language and ICT classes), that might not appear useful in terms of their labour-market-usefulness at first sight, but can be a gateway to further learning

- To provide additional financial support mechanisms for those that are not eligible in the ILA scheme, including people who are not in the labour market and are not of working age, to ensure social inclusion and support the right to lifelong learning for everyone

- To ensure ILA’s are accessible to all learners, including through the use of simple language and the provision of non-digital options to access information about learning offers
We call on the European Commission and the European Parliament:

- To incentivise Member States to provide structural and financial support to ALE at the national, regional and local levels
- To incentive Member States to use wide definitions of eligible training so that the widest possible group of adults can be included in learning
- To closely monitor the implementation of the Individual Learning Accounts through regular reporting and country visits

More information

Contact: Raffaela Kihrer, EAEA Head of Policy, raffaela.kihrer(at)eaea.org

_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 43 countries and represents more than 60 million learners Europe-wide._