

UEAPME reply to the consultation on the promotion and validation of non-formal and informal learning

I. Introduction

On 1 December 2010 the European Commission launched a consultation on the promotion and validation of non-formal and informal learning.

Against a background of rapid technological changes, demographic challenges and high unemployment with numerous requalification needs, UEAPME welcomes this consultation on non-formal and informal learning. The topic is notably addressed in the Europe 2020 strategy and “An agenda for new skills and jobs”, which highlights the importance of lifelong learning within the flexicurity context.

II. General comments

UEAPME considers the Commission’s consultation as very timely given the shift to learning outcomes in education and training and current implementation of European instruments for the recognition and validation of competences and skills notably acquired in the workplace, through the European Qualifications Framework (EQF) and European credit system for the recognition of work-related learning in VET (ECVET).

UEAPME agrees that unlike formal learning, non-formal and informal learning apply to knowledge, skills and competences acquired through work and life, which are not provided through formal education and training institutions. However, according to the EC definition non-formal learning¹ is usually not certified, but we wish to underline that there are some exceptions like in Austria where even if it has no legal significance, non-formal learning is indeed certified.

Therefore subsidiarity needs to be respected due to different understandings of what constitutes non-formal learning in Europe and due to the diversity in the recognition and validation of informal and non-formal learning within education and training systems, including legal frameworks, in Europe.

For UEAPME key objectives of informal and non-formal learning should be:

- to improve the employability of the workforce;
- to adapt to changing labour markets needs and enable Crafts and SMEs increase their competitiveness a
- to overcome the lack of qualified workers;
- to promote flexible learning pathways within and between education systems, in particular between VET and general education;
- to allow individuals to gain access to formal learning supported by guidance, including a “bilan de compétences”.

Last but not least, non-formal and informal learning needs to have tangible benefits for companies while avoiding unnecessary bureaucratic procedures and additional costs for SMEs and crafts.

¹ See EC background paper, November 2010

III. Additional comments

1- Importance and value of non-formal and informal learning

UEAPME would like to recall the key characteristics of SMEs and crafts concerning learning compared to larger companies. In particular informal learning in the form of on the job training plays a major role in small companies, which is largely underestimated and not sufficiently valued. Employees mostly perform multiple tasks with considerable autonomy using a broad range of skills and competences, both transversal and specialised.²

Furthermore, UEAPME considers that non-formal and informal learning is clearly relevant for all categories of persons, including migrants, young people as well as unemployed.

A stronger valorisation of non-formal and informal learning has obvious benefits for individuals in terms of employability. For employers benefits can and should include an optimal use of workers' competences, a more motivated workforce, the development of various innovations and new ideas in the workplace, as well as a better retention of employees, lower recruitment and training costs.

Despite the need of informal and non-formal learning on the labour market, UEAPME considers it should not undermine the value of formal qualifications, which need to be respected. Rather non-formal and informal learning should be considered as complementary to formal qualifications.

2- Perceived challenges

A central challenge is to make visible the range of qualifications and competences held by an individual and acquired in different learning contexts in terms of identification, documentation and recognition.

However, there should be no obligation for an employer to start a validation process. If the employer decides to do so, it must be as simple as possible and suited to the reality of SMEs. Since SMEs have limited financial and human resources it therefore cannot and must not become a formal bureaucratic procedure which creates new red tape. Moreover the full process must be as cost-effective as possible. SMEs should have access to advice and support from external experts and other bodies such as VET providers, Chambers of Crafts and Commerce.

At this stage UEAPME would like to recall once again the diversity of situations in Member States. For example, France has a highly regulated system with an individual right to the recognition and validation of non-formal and informal learning and with implications for collective bargaining and wages. Sweden has a long-standing experience in the validation of non-formal and informal learning in particular of migrants, despite the absence of definite regulatory structures. Unlike France, the focus is thus more on the entry into jobs rather than standards.

Furthermore, UEAPME insists on the role of chambers and business organisations and on the autonomy of social partners in developing mechanisms for the identification, documentation and recognition of non-formal/informal learning according to subsidiarity, but also in a dialogue at company level between employer and employee to adapt provisions to the workplace. Mutual trust and impartiality should be underlying principles to be respected by all actors.

² See study commissioned by DG Enterprise on "Identification of future skills needs in micro and craft-type enterprises up to 2020", final report expected in February 2011.

3- Focus of scope of EU action and possible policy priorities

Given the competence of Member States in the area of non-formal and informal learning, UEAPME considers EU actions useful in fostering an exchange of good practice, peer learning and projects. This should take into consideration the specificities of SMEs and crafts in the workplace and in particular avoiding to create new administrative burdens while respecting the diversity of national education and training systems.

In addition, awareness raising is beneficial for both individuals and employers in order to make the value of informal and non-formal learning more visible. To this end UEAPME welcomes the “European Year of Voluntary Activities Promoting Active Citizenship, including recognition of skills and competences developed through volunteering” in 2011.

Further, UEAPME considers the voluntary European guidelines for validating non-formal and informal learning addressed to practitioners as a valuable tool. The EU should encourage minimum quality standards enhancing synergies through implementing existing European tools and frameworks that support validation and quality assurance, e.g. notably the EQF, ECVET and EQAVET.

Finally, the EU should focus on promoting partnerships, trust and cooperation between stakeholders and institutions involved in both formal and non-formal learning activities. In addition, the EU should foster awareness for the need to integrate learning and career guidance systems better in to all areas of education and training in order to better match individual skills with labour market needs.

Conclusions:

- UEAPME welcomes the timely consultation given the shift to learning outcomes in education and training and current implementation of European instruments for the recognition and validation of competences and skills notably acquired in the workplace, e.g. EQF, ECVET.
- UEAPME points out the need to take into account differences in the understanding for the term “non-formal learning” in Europe
- UEAPME insists on respecting the diversity of education and training systems in Europe and notably the subsidiarity principle
- UEAPME recognises the value of informal and non-formal learning notably for the competitiveness of enterprises and for the employability of individuals
- UEAPME recalls the importance of “on the job training” in crafts and SMEs, while insisting on the role of chambers and business organisations in developing adequate mechanisms for recognition of non-formal/informal learning.
- UEAPME sees an EU role in awareness raising, exchange of good practice, partnerships between formal and non-formal learning activities and establishing minimum quality standards

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