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# ETUCE

## European Trade Union Committee for Education EI European Region

### ETUCE Response to the European Commission's Public Consultation (phase 1) on

### "European initiative on individual learning accounts to empower all individuals to participate in training"

12 April, 2021

#### Background

The [European Commission's Work Programme for 2021](#) announced a forthcoming EU initiative on individual learning accounts (ILA) on which the European Commission will present a proposal for the Council in November/December 2021 based on the outcomes of public consultations.

The Commission will have a 2-phase public consultation on ILA. They published the 1st phase public consultation on ILA (4-week long consultation) on 23 March and it will be open until 20 April [here](#).

This first phase consultation is about to give feedback to the Commission on the text of the [Inception Impact Assessment](#). The 2nd phase of public consultation will run for 12 weeks and it will be published at the end of April.

#### ETUCE's response to the public consultation

ETUCE which represents 127 education trade unions within 51 countries in Europe carefully read the *Inception Impact Assessment* of the European Commission's Public Consultation. We believe that instead of focusing on one single financial mechanism (ILA), the European Commission's initiative should focus on how to guarantee right to access to adult learning, employee training and to paid education leave to all adults and employees, including the public sector workers, and it should motivate the EU member states to set up or improve their financial mechanism by their choice (eg ILAs, vouchers, employers' levy, etc) in order to support the teachers' access to high quality and inclusive continuous professional development within this policy.

The main challenges for teachers in relation to continuous professional development (CPD) are connected to access, finance, recognition and quality assurance. While the 1st principle of the European Pillar of Social Right should be implemented and it should apply to all employees, CPD and paid education leave of the teachers is not a right in every European country. However, around two-third of European countries consider CPD either as a professional duty (12 national education systems) or a mandatory activity<sup>1</sup>. CPD of the

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<sup>1</sup> [Eurydice: Teachers in Europe Careers, Development and Well-being, 2021](#)

teachers can take place within the workplace (schools) (e.g. on the use of IT tools, teachers cooperation, mentoring, training on health and safety) or outside the school (courses, conferences, workshops, etc). Paid educational leave can support teachers' training from personal interest (ensured by public budget) or it can support access to training by the request of the employer (financed by the employer, which can be the ministry, the municipality or the school, depending of the country).

The European Commission considers individual learning accounts same as ensuring right to continuous professional training. ETUCE is against this approach. An EU initiative on supporting access and financing of adult learning and employee training by different financial tools (eg ILAs) can only act as a supportive instrument for teachers training if it recommends to countries to ensure CPD as a right to teachers via effective social dialogue with the education trade unions. Also, ILO Convention 140 on paid educational leave must be implemented in every country so that all teachers can benefit from this equally.

Defining national requirements on qualifications and competences of the teachers provided by initial education and professional training is a national competence. Only after having established the status of CPD as a right in the national legislation or via collective agreements, it is possible to discuss the development of financial mechanisms to support paid leave, for example by using ILAs or any other tools the national education social partners can agree with (eg vouchers).

The EU-level initiative can solve some challenges in teachers' accessing CPD. Recommendations to EU Member States to develop effective solutions to improve access for teachers to quality and inclusive CPD within working hours and for free would be essential. However, the EU-level initiative on financing CPDs (e.g. ILAs) should respect national systems of qualification and competence requirements towards teachers and not create an EU-level harmonised system for financing teachers' CPD.

The initiative should recommend to countries to improve the quality standards of training and quality assurance of the providers of teachers' CPD. More EU-level research is necessary to clearly understand the regulation about CPD to teachers at each education sectors. Most data available, in OECD TALIS and Eurydice only cover teachers in secondary education.