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ETUCE Position on

“European initiative on individual learning accounts to empower all individuals to participate in training”

Adopted by ETUCE Bureau on 7 June 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 a Council Recommendation in November/December 2021 based on the outcomes of public consultations.

The European Commission initiated a 2-phase [public consultation](#) on ILA. The 1st phase of the public consultation was 4 weeks long between 23 March and 20 April 2021 and asked feedback on the text of the [Inception Impact Assessment](#). The [2nd phase of public consultation](#) is open for 12 weeks, between 23 April and 16 July 2021, and invites any stakeholders to reply to a questionnaire and send position papers.

ETUCE's position

ETUCE which represents 127 education trade unions within 51 countries in Europe carefully read the *Inception Impact Assessment* and the questionnaire of the European Commission's Public Consultation. We regret that the questionnaire only asks the opinion of those stakeholders and institutions that deliver trainings. **Education trade unions** deliver trainings themselves to teachers and are competent organisations regarding decisions on training needs and training provision for the teachers within **social dialogue**. We are also concerned that the public consultation does not explain how the initiative supports access of **public service employees to continuous professional trainings**.

We believe that instead of focusing on one single financial mechanism, the European Commission's initiative should concentrate on how to guarantee the right to access adult learning, employee training and to paid education leave to all adults and employees, including the public sector workers. The initiative should motivate the EU member states to set up or improve their **financial mechanism by their choice** in order to support all adults', including **teachers' access to high quality and inclusive continuous professional development** in line with **existing legislation and collective agreements**. It should be the responsibility of the Member States and the education sector social partners to decide if their financial mechanism for ensuring teachers' CPD is sufficient enough or they need improvement. In addition, it should be their national competence to choose among financial mechanisms, such as establishing systems of individual learning accounts (ILA), training vouchers, tax incentives for individuals and/or for companies, subsidies to education and

training providers, or by sharing of training costs between employers, public authorities and individuals.

Therefore, we consider more effective to strengthen the **EU level monitoring and exchange of best practices among EU member states** on financing and ensuring quality teachers' continuous professional development instead of an EU level legislation on individual learning accounts.

The first principle of the [European Pillar of Social Rights](#) should be implemented and it should apply to all employees, including the education sector employees, to guarantee the **right to access to quality initial education and continuous professional training** for teachers. Still, access to CPD and paid education leave is not a right for teachers in every European country, although this should be assured **equally for all teachers and education staff in every education sectors and all school types**. National education systems should establish the appropriate conditions (time used, quality of providers, financial support, etc.) to help teachers use their right.

The right to access quality initial teaching and CPD does **not mean an obligation** for teachers. At the same time, around two-thirds of the European countries consider CPD either as a professional duty (12 national education systems) or a mandatory activity¹. Teachers' CPD can take place at the workplace (schools/education institutions) (e.g. on the use of IT tools, teachers' cooperation, mentoring, training on health and safety) or outside the education institution (courses, conferences, workshops, etc.). **Paid educational leave** can support teachers' training from a **personal interest level** (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 education institution, depending of the country).

Continuous professional development (CPD) is essential for the teachers to support their **lifelong learning** and not only skills demanded by the employers and the labour market. These should be **formal courses** leading to **certification** and be recognised in order to support teachers' career development Teachers should be allowed to access CPD on their own interest and **career development**. The **motivational** aspect of the CDP for the teachers should not be neglected. High quality, inclusive and free CPD can be very attractive to **recruit** the best teachers and it can help to retain them in the profession. However, in order to ensure access to CPD, it is important to ensure **qualified substitute teachers** when teachers attend CPD.

The European Commission considers individual learning accounts (ILAs) equal to ensuring the **right to continuous professional training**. ETUCE is against this approach. An EU initiative on supporting access and financing of adult learning and employee training through different financial tools (e.g. ILAs) can only act as a supportive instrument for teachers' training if it recommends to countries to ensure continuous professional development as a right to teachers via **effective social dialogue** with the education trade

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

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 teachers** provided by initial education and professional training is a national competence. Only after having established the status of continuous professional development 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.

The main challenges for teachers in relation to continuous professional development (CPD) are connected to **access, financing, recognition and quality assurance**. OECD [TALIS 2018 \(Vol. I\)](#) reports that the main barriers perceived by teachers regarding CPD are the high costs which are mostly borne by the teachers, scheduling conflicts, family responsibility and lack of CPD offer or support by the employer. In many countries the financial contribution by the governments provided to teachers to take paid educational leave to update their competences or qualifications is not adequate to cover all the cost of the CPD or a new qualification. We request that the EU initiative should ask the EU Member States to ensure **incentives for teachers for quality CPD and to increase their qualification level** because such financial support in several countries have existed before the 2008 economic and financial crisis but due to austerity measures they were cut and they have not been reinstated since then. We remind that the **recovery from the present crisis** cannot be possible with austerity and that the **Recovery and Resilience Facility (RRF)** should ensure investment to **teachers' CPD and to improve the career pathways with additional qualifications of their choice**.

An EU-level initiative can solve some challenges in teachers' accessing CPD. CPD courses are provided many times outside **working hours** while **replacement** during working hours is not guaranteed. It is essential that teachers should not be left on their own in organising their CPD within their free time. 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** is essential. Teachers' **work-life balance** needs to be respected. 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.

Teachers are very well aware of the importance of professional development and what their individual needs are for further training, as the OECD TALIS report shows. They should have the right but not the obligation to attend CDP and they should have the **freedom to choose among the trainings** according to their needs. However, the training provision and offer is increasingly **privatised**, and teachers do not always have **information about quality assured courses** because many CPD systems are decentralized. While education trade unions provide information to the teachers on trusted CPD courses, EU member states should **improve the quality of CPD courses by defining strict quality standards and requirements towards providers** and by establishing a **good quality guidance and counselling system** for the teachers together with the education trade unions.

An EU initiative should recommend to countries to improve the quality standards of training and **quality assurance** of the providers of teachers' CPD. A **European and national list of trusted and quality assured training providers** would support the access of teachers to further training under an EU initiative. This would also help with the **recognition** of the CPD for teachers provided within or beyond borders supported by the **Erasmus mobility and Erasmus Teachers Academy** programme. It is important to ensure guidance and counselling to teachers on choosing the best trainings to their needs. While **education trade unions** take on this responsibility, they need more **financial and non-financial support to enhance career advice and guidance** on trainings to teachers.

We remind the lack of data available by OECD TALIS and Eurydice which only cover information about teachers' CPD in secondary education. More **EU-level research** is necessary to clearly understand the regulations about CPD for teachers in all education sectors.