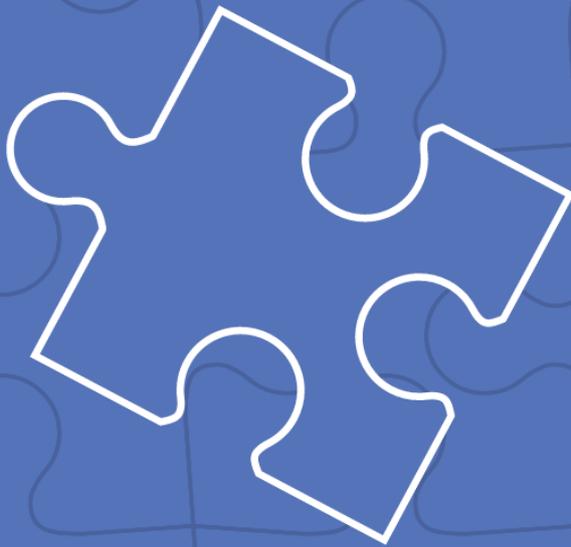


AONTAS

**Submission to the
European Commission's
public consultation on a
European approach to
micro-credentials for
lifelong learning and
employability**



Date: July 2021



**The Voice of
Adult Learning**

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About AONTAS

AONTAS is a long established (1969), non-governmental membership organisation that promotes the value of adult learning and advocates for the rights of all adults to quality learning across the tertiary education system. We have an unwavering commitment to educationally disadvantaged adults, we offer solutions-focused advocacy that is evidence-based drawing on research and our extensive meaningful learner engagement activities. Our Strategic Plan: A Vision for Educational Equality (2019-2022) is informed by principles of: social justice, feminism, partnership, valuing diversity, advancing equality and supporting social inclusion. We continually strive to offer work of the highest quality as an inclusive, informed, dynamic organisation which will act as a cooperative, trusted, critical friend to the Department of Further and Higher Education, Research, Innovation and Science. We continually engage with learners and educators from further education and training, community education and higher education on a weekly basis, affording us key insights into practice. We have expertise in educational equality and we advocate strongly for community education, as the most inclusive, yet underfunded part of the education system. Our work covers: Research: Authentically hearing learner voice, particularly those marginalised, through a mixed methods research project, The National FET Learner Forum. Some recent examples of publications in this area are the 2019 Annual Synthesis Report and the COVID-19 FET Learner Report. Democratising relevant academic work in our well-established peer reviewed journal, The Adult Learner. Promoting lifelong learning and access: first week of March the annual AONTAS Adult Learners' Festival (circa 300 events/open days across Ireland), STAR awards recognising excellence in inclusive education projects -and an annual Policy Day event. Encouraging people to engage in learning: Freephone information referral helpline and website www.onestepup.ie. Building capacity and supporting professional development in community education through the AONTAS Community Education Network (Est. 2007). We have strong European links: designated by the then Department of Education and Skills as the National Coordinator for the European Agenda for Adult Learning. We lead or partner in 8 European funded projects across all levels of Erasmus+, are on the Board of the European Association for Education of Adults (EAEA) and are linked globally. Co-established the Network of Adult Learning Across Border (NALAB), bringing together national adult learning advocacy structures across Ireland, 3 England, Scotland, Wales and Northern Ireland in response to Brexit. Ultimately, all our work, and communication activities aim to advocate for the rights of all adults to engage in learning so as to fulfil their aspirations. Who we represent: Organisations and individuals committed to educational equality for adults: 500 members [all 16 ETBs, over 120 community education organisations, adult learning/access departments of Higher Education Institutions, social justice NGOs, educators and learners across the Island of Ireland].

Introduction

AONTAS welcomes the opportunity to submit its policy positions as part of participating in the [European Commission's public consultation on a European approach to micro-credentials for lifelong learning and employability](#), primarily because Ireland, it's nearest neighbours and all of Europe must urgently draw on every possible policy tool at our disposal for stemming the negative fallout of the pandemic on our societies' most educationally vulnerable, marginalised, disadvantaged and excluded learners. If decisionmakers fail to open up learning opportunities to everyone, and fall short of adequately strengthening the role of all tertiary education institutions in improving lifelong learning participation rates, then this once in a Century opportunity to 'build back better' and respond to the most rapid changes and greatest challenges of our generation will have been squandered. Adult learning is crucial to our shared recovery and collective resilience, innovation and adaptation, as well as to social inclusion, equality and the health and vibrancy of our economies and democracies. By making micro-credentials a progressive route towards greater educational and socioeconomic equity, decisionmakers will be able to ensure there is a significant positive macro-effect on the lives of learners, their families and communities across all of Europe. Where educational equity increases and adult learners' lives are improved, everyone in society benefits across a wide range of policy outcomes. AONTAS therefore urges the European Commission to ensure that micro-credentials

- a) Contribute to equity of access to educational opportunities
- b) Facilitate the 'furthest back first' – by focusing on the early stages of returning to learning and the first levels of the [National Framework of Qualifications](#) (NFQ)
- c) Extend to non-formal education
- d) Support people who could not complete their courses due to COVID, especially marginalised learners
- e) Always link to major awards and higher levels of the NFQ to support progression pathways and contribute to greater socioeconomic diversity and inclusion in tertiary education institutions, especially in the higher education sector.

a) Contribute to equity of access to educational opportunities

In the European Commission's '[A European approach to micro-credentials Output of the Micro-credentials higher education consultation group: final report](#)' (2021) there are a number of significant findings and points made which should be of great concern to those who understand what is to be gained, and lost, if Europe does not include the most educationally disadvantaged and socioeconomically marginalised members of our societies in new policies aiming to improve educational outcomes and lifelong learning participation rates. The Commission's final report (2021, 1) states that

'Increasingly rapid advances in technology and the labour market require graduates and professionals in the workforce to be familiar with state-of-the-art knowledge, and to possess the skills and competences needed to make full use of technological and non-technological know-how. Content-laden degrees are not always effective for adult learners in today's fast paced environment and employees also need 'just-in-time' skills development that is immediately applicable. This trend is likely to accelerate with the economic crisis triggered by the COVID-19 pandemic. A European

approach to micro-credentials will increase personalised learning opportunities for all. It will help widen learning opportunities and strengthen the role of higher education and vocational education and training (VET) institutions in promoting lifelong learning by providing more flexible and modular learning opportunities. While it requires a change in mindsets, culture and structures, it also opens up new opportunities for the higher education sector. Micro-credentials are useful not only for professionals, but can also complement the curriculum for students at bachelor, master and doctoral levels. A growing number of adults, with or without a higher education degree, will need to reskill and upskill through more flexible alternatives than a full degree in order to overcome the gap between the learning outcomes of their initial formal qualifications and emerging skills needs in the labour market. The need for more flexible and inclusive learning paths will increase as the student population is becoming more diverse and the learning needs more dynamic’.

In Ireland, as in other European countries, it is marginalised learners that are the dominant cohort engaging in non-formal learning, and formal learning provision, via Community Education (CE), Further Education and Training (FET) and Vocational Education and Training (VET). The findings from AONTAS’ COVID-19 report illustrate the extent of this engagement with vulnerable and disadvantaged learner cohorts such as the unemployed; socio-economically disadvantaged learners; people with a disability; lone parents; migrants; Travellers and Roma communities; people experiencing homelessness; substance misusers; people living in Direct Provision; and ex-prisoners - all groups who have traditionally been excluded from benefitting equally from participating in the formal education system. CE and FET have historically been especially well placed to provide progression pathways into higher education settings so that learners from social groups who have been left out and left ‘furthest back’ might have an opportunity to access degree courses and contribute to the diversification of university and college campuses. As with all policy tools and practical mechanisms at the European Commission’s disposal, micro-credentials must also focus on learner cohorts from communities that have experienced the most educational disadvantage and socioeconomic marginalisation. Micro-credentialing must be recruited as another means of fully addressing the drop in lifelong learning participation rates witnessed over the past year and a half. For example, we know that

- The lifelong learning participation rate in Ireland for people with lower secondary education/Junior Cert halved in 2020 compared to 2019 (SLMRU, SOLAS, 2021).
- There was a dramatic drop in accreditation awards at NFQ levels 1-4 during 2020 (down 49% from 2019).
- Minor awards were also down by more than a quarter (27% from 2019).
- There were 14% fewer active providers of Quality and Qualifications Ireland (QQI) awards in 2020 compared to 2019 (QQI, 2021), meaning there appears to be fewer organisations offering accredited provision in Ireland.
- National statistics also reveal a drop in Further Education and Training (FET) participation levels by minority social groups during 2020-approximately 25% for Travellers and a drop of 15% for people with disabilities, those aged 50+, refugees and asylum seekers.

Hard-earned gains to increase access to all forms of education are being lost, fast. Micro-credentials must be involved in resolving the problem. There may be similarities across European countries and differences rooted in various contextual nuances, but there is a pan-European need to give more attention to adult learners from educationally disadvantaged cohorts. Their voices must be heard and acted on across all jurisdictions if Europe is to collectively rebuild, recover and ultimately prosper through more inclusive educational mechanisms. Models of micro-credentialing must be designed primarily to empower vulnerable and marginalised learners in a way that equally benefits all learners. AONTAS therefore echoes the European Association for the Education of Adults' (EAEA) statement in their submission that

'[M]icro-credentials are a potential tool that could boost access and participation to lifelong learning by bringing more flexibility to the learning pathways and personalised learning thanks to the modular approach and portability of credits. This is likely to attract a larger and more diverse number of learners, such as adults, and in the employment context it can open up lifelong learning opportunities for continuous professional development. For this initiative, as well as others related to education and training, the first principle of the European Pillar of Social Rights should be respected, protected and fulfilled for learners and educators alike to access quality education and training' (EAEA 2021, 1).

b) Facilitate the 'furthest back first' – by focusing on the early stages of returning to learning and the first levels of the National Framework of Qualifications (NFQ)

AONTAS welcomes the inclusion of non-formal learning in the Commission's final report as a deliverable in its Roadmap of Actions, stating the importance of

'[F]ostering the availability of recognition of prior learning and validation of informal and non-formal learning options, which are scalable to higher numbers of applicants' (EC 2021, 28).

However, two aspects are clear from the report: one, micro-credentials for non-formal learning are mainly discussed in relation to employment and within the context of higher education settings; and two, unfortunately the importance of non-formal learning provided via organisations in the community education sector has been sorely overlooked. AONTAS appreciates the depth and breadth of the issues surrounding developing a comprehensive framework and we applaud the consultation group for recognising that 'this is an evolving process that needs to be sensitive to differences in national circumstances'; we also acknowledge that '[S]ome national qualifications frameworks do not permit inclusion of nonformal qualifications' which must change as soon as possible. However, regarding '[M]icro-credentials issued by non-formal education providers', the report openly states that..[T]he consultation group did not have sufficient time to discuss this type in depth. Further discussion is needed, across education sectors, to identify standards for these micro-credentials' (EC 2021, 14). While understandable given the scale of the topic, this is neither ambitious nor comprehensive enough to ensure that the full potential of micro-credentialing is achieved, implemented fairly and with equitable outcomes for adult learners. Not taking into account the crucial

early experiences of learners at the all-important first stages and foundational levels of returning to education in non-formal settings goes against the core aims and spirit of national policies designed to include educationally disadvantaged learners. It would also go against the objectives of the European Agenda for Adult Learning and its surrounding policy frameworks, such as the Pillar of Social Rights, as well as diverging with other overarching strategic objectives like the United Nations' Sustainable Development Goal 4. If Europe is to maximise the value of successfully introducing a micro-credentials infrastructure then adults participating in non-formal learning who often make-up the most vulnerable and marginalised cohorts in our societies must be included and benefit equally.

c) Extend to non-formal education

On the website for the [European Commission's call for submissions](#), micro-credentials are described as being

'a highly flexible, inclusive form of learning allowing the targeted acquisition of skills and competences. Micro-credentials are offered by higher and vocational education and training (VET) institutions, as well as by private organisations. They can be particularly useful for people want to:

- build on their knowledge without completing a full higher education programme
- upskill or reskill to meet labour market needs or to develop professionally after starting work'

While AONTAS appreciates the role which micro-credentials play here, there is some concern that by not explicitly naming and recognising the important role played by non-formal education and the significance of the provision found in the community educations setting for improving people's lives, skills development and employability, that the European Commission is missing an opportunity to embed truly inclusive models of micro-credentialing in future policy and practice. Given that a key aim of this public consultation is

'to collect ideas for the development of a common definition for micro-credentials, European Union (EU) standards for their quality and transparency and the next steps to be taken at the institutional, national and EU levels'

AONTAS therefore encourages the Commission to explicitly state the parity of esteem and equal weight between non-formal learning and the other mutually important constituents of tertiary education provision which often form the foundations for learning to learn competences; and the bedrock for access, progression and lifelong participation in higher education, as well as FET and VET institutions. Community education has predominantly focused on short courses and excels in achieving non-formal non-accredited learning outcomes. Micro-credentialing offers another excellent opportunity for flexible community education and AONTAS refers to the findings of its study that found that the majority of community education learners would like to see

their learning accredited, even as they often enter education for reasons other than labour market access (AONTAS, 2011).

Furthermore, by neglecting to appreciate, recognise and include non-formal learning provision in a Council Recommendation on micro-credentials for lifelong learning and employability, Europe would be failing to fully harness all of the educational opportunities and tools at our collective disposal to deliver on commitments made and to achieve positive outcomes across the following policy frameworks:

- Council Resolution on a strategic framework for European cooperation in education and training towards the European Education Area and beyond (2021-2030)
- Commission Communication on achieving the European Education Area by 2025 (2020)
- Digital Education Action Plan (2021-2027)
- European Skills Agenda

AONTAS echoes the EAEA's position that introducing and developing an inclusive micro-credentials infrastructure would enable greater recognition of prior learning and extend validation and recognition to encompass areas of lifelong learning that have been traditionally neglected by policymakers. AONTAS also agrees that

'care should be taken when approaching quality assurance (QA) standards as often these are far too rigid for non-formal education providers. Especially in non-formal adult education, there are a number of small providers and NGOs, who would not be able to go through complicated quality management systems. We would like to see QA standards moving towards learner-centred processes' (EAEA 2021).

d) Support people who could not complete their courses due to COVID, especially marginalised learners

The full and long-term negative impact of the pandemic on areas such as mental health and of individuals contracting COVID-19 are still largely unknown. Some thought must be given to future-proofing a new micro-credential system so that their value and design accommodates those learners who have had to pause or leave courses due to illness, loss of income, increased caring responsibilities and other associated barriers to access and progression that have arisen. As the EAEA has already highlighted, AONTAS believes that it is imperative that any new micro-credential system does not only fulfil employment and labour market needs but is also fit for purpose. A new system has to go beyond merely accommodating other equally important learning outcomes such as learners' personal development and wellbeing; it should facilitate and support learning outcomes in such categories, especially in relation to learners who have experienced barriers prior to the pandemic and have had those circumstances further exacerbated, putting them at an even greater disadvantage than before.

e) Always link to major awards and higher levels of the NFQ to support progression pathways and contribute to greater socioeconomic diversity and inclusion in tertiary education institutions, especially in the higher education sector.

AONTAS agrees with the EAEA's position that micro-credentials should be designed in such a way that they encourage learners and boost their confidence to continue engaging in lifelong learning and to take further steps towards educational attainment and progression in formal education provision. Like the EAEA, AONTAS strongly asserts that every effort must be made to avoid using micro-credentials as a substitute or stop-gap measure for papering over the cracks of the tertiary education system's failure to adequately include and support disadvantaged learners to access and succeed in formal learning, especially in higher education settings that still do not fully represent the social and economic diversity of our societies. AONTAS would welcome micro-credentialing as a means for facilitating the most marginalised adult learners to access and benefit equally from all forms of tertiary education. Although some have made great strides in this area, many Irish Higher Education Institutions (HEIs) have mixed track records in being truly reflective of the diversity of the Irish population (O'Shea 2020). Through incorporating micro-credentials HEIs would have another tool for reaching and supporting learners from traditionally under-represented groups in that sector. This cannot be achieved by HEIs alone. It is vitally important that any micro-credential infrastructure be co-developed in consultation with the sector and form of provision that has the best track record of supporting learners from such groups. Community education providers and local Education and Training Boards are among the stakeholders who have a mutually important and reciprocal role to play in ensuring that progression pathways are enhanced by introducing micro-credentials, especially when considering learners' needs and the stage learners are at on their learning journey.

In developing quality assurance around micro-credentials, particularly around non-formal learning and regarding the inclusion of disadvantaged learners engaging on the first levels of the NFQ, a variety of learning pathways that involve the validation of micro-credentials via 'online-anytime-anywhere learning' that carries the level of prestige and form of accreditation which supports learners to achieve sustainable employment. It is vital that a list of trusted providers, social partners and civil society organisations that work closest with adult learners and their communities are involved in the quality assurance framework developed for micro-credentials.

Conclusion

'For at least a decade, lifelong learning has been considered essential for individuals and societies to navigate a rapidly changing world of work shaken by globalisation, technological and environmental changes as well as demographic changes. In the aftermath of the Covid-19 pandemic, it is essential that lifelong learning becomes a reality to all individuals since the crisis has further accelerated the transformation in our economy and skills needs. Individuals' ability to adapt and thrive in a fast-evolving world rests on their having acquired strong foundation skills, the willingness to learn and a habit of learning (otherwise known as lifelong learning attitudes). These skills and attitudes are vital for them to absorb and expand the knowledge and

skills required to navigate new labour-market needs and life circumstances' (OECD 2021, 3)

We know that rates of participation in adult and lifelong learning have been severely negatively impacted by the pandemic. Educational inequality has been exacerbated. Micro-credentials must therefore help redress this gap and not further exacerbate it. For this public consultation to successfully feed into next steps covering all sectors of education and training, making as valuable a contribution as possible to the preparation of a Council Recommendation on micro-credentials for lifelong learning and employability by the end of 2021, AONTAS recommends that the areas covered in this submission are fully considered and ultimately included in final draft policy formation that includes every adult learner. As Ireland's national coordinator of the European Agenda for Adult Learning, AONTAS looks forward to working closely with our counterparts across Europe on making sure that micro-credentials result in positive macro-outcomes for the most educationally disadvantaged learners in our societies to everyone's mutual benefit, and to making Europe's tertiary education ecosystem truly equitable.

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The Voice of Adult Learning

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