

DOCUMENT RESUME

ED 479 660

CE 085 272

TITLE Feedback from European Social Partners as Part of the Consultation on the Commission's Memorandum on Lifelong Learning. Supporting Document to the Communication from the Commission Making a European Area of Lifelong Learning a Reality.

INSTITUTION Commission of the European Communities, Brussels (Belgium). Directorate-General for Employment and Social Affairs.; Commission of the European Communities, Brussels (Belgium). Directorate-General for Education and Culture.

PUB DATE 2001-11-00

NOTE 38p.; For the memorandum "Making a European Area of Lifelong Learning a Reality" see CE 084 841. For other supporting documents, see CE 085 273-274. Includes responses from the European Centre of Enterprises with Public Participation and of Enterprises of General Economic Interest, European Trade Union Confederation, European Association of Craft, Small and Medium-Sized Enterprises and Union of Industrial and Employers' Confederations of Europe.

AVAILABLE FROM For full text: http://europa.eu.int/comm/education/policies/l11/life/communication/social_partners_en.pdf. For full text in French and German: http://europa.eu.int/comm/education/policies/l11/life/index_en.html.

PUB TYPE Opinion Papers (120)

EDRS PRICE EDRS Price MF01/PC02 Plus Postage.

DESCRIPTORS Access to Education; Adult Basic Education; Basic Skills; Developed Nations; *Employer Attitudes; Employer Employee Relationship; *Experiential Learning; Foreign Countries; *Human Capital; Informal Education; *Labor Force Development; *Lifelong Learning; Nonformal Education; *Policy Formation; Prior Learning; Public Policy; Role of Education; Skill Development; Teacher Role; Vocational Education

IDENTIFIERS *European Communities Commission

ABSTRACT

This document provides European social partners' responses to the Commission's memorandum on lifelong learning. Part 1, Opinion of the European Center of Enterprises, makes comments and proposals related to the memorandum's six key messages, which are new basic skills for all; more investment in human resources; innovation in teaching and learning; valuing learning; rethinking guidance and counseling; and bringing learning closer to home. Part 2, a resolution adopted by the European Trade Union Confederation, addresses lifelong learning for all and a challenge for Europe; structural conditions required; access; increased investment in human resources; time for training; recognition of results of formal, nonformal, and informal learning; work and training organization; new partnership concept; role of education and vocational training systems--skills for each person; innovation in teaching and training methods--role of teachers and trainers; bringing learning closer to home; and social partners' specific role. Part 3, position paper of the European Association of Craft, Small, and Medium-Sized Enterprises, discusses challenges enterprises face, including dependency on

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employee skills, shortage of skilled labor, and lifelong learning as a shared responsibility; stresses that education and training are member states' responsibility, the entire workforce must have the opportunity for continuous training, regional organizations have a role, use of new methods must be promoted, and the individual is responsible for his/her skill development; and comments on the key messages. Part 4, Union of Industrial and Employers' Confederations of Europe's position paper, provides detailed comments on the key messages through responses to related questions. (YLB)



EUROPEAN COMMISSION

Directorate-General for Education and Culture
Directorate-General for Employment and Social Affairs

Supporting Document to the Communication from the Commission
Making a European Area of Lifelong Learning a Reality

FEEDBACK FROM EUROPEAN SOCIAL PARTNERS AS PART OF THE CONSULTATION ON THE COMMISSION'S MEMORANDUM ON LIFELONG LEARNING

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PART ONE



EUROPEAN CENTRE OF ENTERPRISES WITH PUBLIC PARTICIPATION AND OF
ENTERPRISES OF GENERAL ECONOMIC INTEREST

Opinion on the Commission Memorandum on Lifelong Learning

CEEP. 2001/AVIS 17

Orig. Fr – July 2001

**OPINION
ON THE COMMISSION
MEMORANDUM
on Lifelong Learning**

CEEP considers that the working paper "A Memorandum on Lifelong Learning" is an important document. It opens the debate on a European scale in the area of education and training in order to formulate objectives common to all the Member States, while retaining the principle of subsidiarity in this domain, which relates to the social and cultural policies of each country.

CEEP approves the approach outlined in the conclusions by the Portuguese Presidency of the European Council that "lifelong learning is an essential policy for the development of citizenship, social cohesion and employment".

In this spirit, CEEP welcomes the recognition, apparently for the first time, of different methods of learning, including those that take place in undertakings (formal, non-formal and informal learning) which all form part of the skills development of each citizen and which therefore deserve to be taken into account. In this connection, CEEP recalls that training courses fully or partly conducted in undertakings may result in qualifications recognised at branch level or by chambers of commerce and industry.

The main challenge in this area, in CEEP's view, particularly at a time when Europe's active population is ageing and the aim is to develop a knowledge-based economy and society, is to involve all players in developing lifelong learning: the authorities, undertakings, social partners, training bodies and citizens. This is the context in which CEEP would like to make a contribution.

Before making comments and proposals on the six key messages in the Memorandum, CEEP wishes to underline two points which it considers essential.

- a) It emerges from the document that lifelong learning means seeing all learning as a seamless continuum from cradle to grave, with the essential foundation being "high quality basic education for all".

CEEP is concerned that the basic skills mentioned include languages and ICT, and that the social division linked (long before "digital knowledge") to illiteracy is not mentioned more explicitly. It is regrettable that not much attention is focused on this problem. There is probably a major challenge here for our European societies in terms of teaching and research into basic education. If this problem affecting young people as well as working adults, as shown by various studies, is not dealt with, there is a risk that the development of learning techniques using ICT, and hence often requiring perfect mastery of reading, will result in an increase in the number of people excluded from society. CEEP considers this to be one of the main problems hampering the development of lifelong learning.

- b) Another obstacle could be the lack of motivation on the part of employees and citizens to engage in lifelong training. All training for adults challenges the individuals involved. Training can only be perceived as the development of skills and knowledge if they are valued and recognised at company level and by society.

Lastly, it must be remembered that the situation varies significantly in the European Union countries and in the candidate countries.

A global approach to the six messages should therefore be modelled more precisely to suit each country depending on its population, economy and lifelong learning system.

Key message 1: New basic skills for all

Objective Guarantee universal and continuing access to learning for gaining and renewing the skills needed for sustained participation in the knowledge society.

CEEP supports the principle of the recognition for everyone of an individual right to acquire and upgrade skills, as well as lifelong knowledge.

But this is only possible if a minimum level of skills and knowledge has been acquired during basic education.

These minimum skills and knowledge must include reading, writing and arithmetic, and socialisation skills. Second language learning must be introduced from the beginning of primary education for children.

Learning to deal with ICT also involves integrated use of these technologies by teachers in basic education.

A debate should be conducted on the support given to parents in their role in the education of their children, which is by necessity different from their own experience at school.

But in a rapidly evolving technological society, the upgrading of skills and knowledge also involves adults and the active population of increasingly older employees.

Adults must be motivated and encouraged to ensure this necessary acquisition of more skills. Yet it is clear that the less qualified employees are less motivated when it comes to training.

If no specific efforts are made in relation to this problem, there is a considerable risk of a growing gap between the skilled and the less skilled, with the danger of a new social division emerging.

But it is also essential to invest in research and the development of new forms of learning for adults, for instance: educational TV programmes and the establishment of local authority resources centres, as well as areas where young people and adults could work together.

With respect to ITC, CEEP is in favour of studying the introduction of a "European driving licence" for young people and adults.

Key message 2: More investment in human resources

Objective Visibly raise levels of investment in human resources in order to place priority on Europe's most important assets – its people

When young people leave the basic education system and start work, this should not be perceived as the end of studying. It must be made clear that people have a real right to lifelong learning.

This real right to take control of one's own training requires investment in terms of finance and time, which must be distributed among the actors involved: the authorities, employers, undertakings and employees. The part played by these actors could vary depending on the skills being developed: work-related skills or employability skills.

There are various and varied experiences, often innovative, in different countries, particularly in public service enterprises. CEEP is ready to take part in collecting and analysing good practices in this domain with other partners.

Key message 3: Innovation in teaching and learning

Objective Develop effective teaching and learning methods and contexts for the continuum of lifelong and lifewide learning

If there is to be a continuum in the supply of lifelong learning, there must be innovation in pedagogic research into methods of learning and investment in the

development of professional skills of teachers and trainers, particularly in the field of ICT.

CEEP proposes that alternate work/training courses should be developed after basic education to enable young people still undergoing training to start finding out about the business and industrial world, as well as about transnational training schemes.

Methods of learning adapted to suit adults must be devised, without giving them the impression of "going back to school": training courses based on professional experience and the development of e-learning adapted for adults.

The development of teaching positions in companies could facilitate the introduction of new methods of learning.

The teaching and training community should be brought closer to the business and industrial world, in particular by means of in-company training courses.

Lastly, in order to develop lifelong learning, it is essential to involve employers in research and definition of the necessary skills for specific qualifications.

Key message 4: Valuing learning

Objective Significantly improving the ways in which learning participation and outcomes are understood and appreciated, particularly non-formal and informal learning

In a knowledge-based society where there is a will to seek full employment and mobility of workers within the European Union, it is vital that knowledge, skills and qualifications are "portable" from one EU State to another.

CEEP thinks that this aim, which can only be worked out in the long term, requires that, as a matter of priority, research and experiences involving good practices should be pursued in the field of validation and certification of skills, particularly in domains in which mobility of workers within European countries is highly desirable.

But CEEP considers that, in addition to developing informal training courses, it is also necessary to develop systems to "accredit prior experiential learning" and to provide them with legitimacy and legality on an equal footing with current qualification systems in each country.

The social partners must be closely involved in research and the collating of good practices in these areas.

Key message 5: Rethinking guidance and counselling

Objective Ensure that everyone can easily access good quality information and advice about learning opportunities throughout Europe and throughout their lives.

If lifelong training is to be developed, workers and citizens must have the opportunity to regularly review the skills acquired and to direct their own personal and professional training path.

CEEP is in favour of introducing a right for citizens and workers, at their own initiative, to request a review of their skills in a neutral forum, independent of structures that may exist in their companies, and conducted by professionals who are independent of these companies.

The guidance and counselling services to be developed must, regardless of their status, be governed by a charter laying down ethical and quality rules as well as entitlements. It is the responsibility of the authorities, in cooperation with employers and the social partners, to draft such a charter.

Given the extent of guidance problems, self-training tools must be developed. However CEEP considers that the use of these tools must be simply a preparatory phase prior to an interview with a guidance professional.

Key message 6: Bringing learning closer to home

Objective Provide lifelong learning opportunities as close to learners as possible, in their own communities and supported through ICT-based facilities wherever appropriate.

The mobilisation of the resources of regional and local authorities to promote lifelong learning is, in CEEP's view, a vitally important element in ensuring regional dynamism and in particular employment.

In this context CEEP is in favour of opening training venues wherever pertinent for young people and adults: in schools and training centres, companies, community centres, etc.

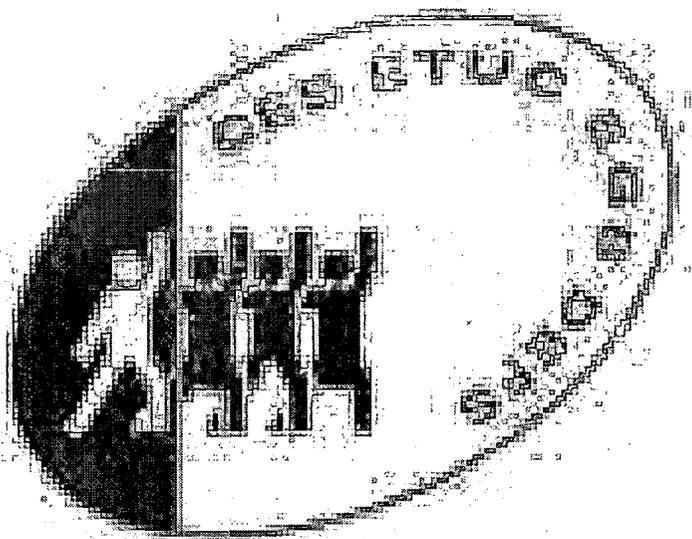
The opening of such training venues must promote contacts and exchanges of knowledge between young people and adults, with young people providing coaching in IT skills and older people providing coaching in life skills.

But access to these diverse and open venues must be based on content and programmes that are consistent with the qualifications to be attained, defined under the responsibility of the authorities.

To conclude the comments on this Memorandum, CEEP approves the will to define quantitative and qualitative indicators on lifelong learning, and it is willing to take part in research into these indicators. By the same token, CEEP is ready to participate in studies to identify the good practices necessary to ensure effective application of the conclusions on the six key messages.

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PART TWO



EUROPEAN TRADE UNION CONFEDERATION

Resolution adopted by the ETUC Executive Committee – 13/14 June 2001, Brussels – on
the Commission Memorandum on Lifelong Learning

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LIFELONG LEARNING

Trade union strategies

**Resolution adopted by the ETUC Executive Committee,
13-14 June 2001, Brussels**

150.Ex./06.01/07

Lifelong learning for all: a challenge for Europe

1. The European Union is facing major challenges as a result of the globalisation of markets and economies and the introduction of new technologies, especially information and communication technologies (ICT). These challenges have a direct impact on job creation, as well as on the organisation of work, services and production.
2. The promotion of innovation, the strengthening of social and territorial cohesion, access to knowledge and information, the promotion of social inclusion and integration into employment must be part of any successful solution to these challenges. Every citizen must make a meaningful contribution if the objectives of full employment and the creation of a knowledge-based society are to be achieved.
3. The ETUC considers that the knowledge-based society represents new opportunities for everyone, but must not create new categories of social excluded and must ensure that individuals can acquire the knowledge, skills and qualifications - the instruments - to enable them to react in the face of the rapid evolution of society and the labour market, by providing the right response at the right time to each citizen. Access to lifelong learning contributes to individual development and individual fulfilment, the promotion of equal opportunities, the development of active citizenship and promotes greater social cohesion and integration in the context of societies which are becoming increasingly multi-cultural; it also stimulates economic development. In a word, it is essential to strengthen the European social model. That is why the ETUC does not accept the essentially employment-related view that is often adopted as regards the role of lifelong learning.
4. Europe must construct a new culture of lifelong learning. In order to accomplish that, it must develop innovative and integrated approaches, as well as greater synergies between the different policies and the authorities responsible for their implementation, both nationally and at European level; this means defining the new objectives, new rights and new responsibilities of the actors concerned. It is obvious that the promotion of a high quality lifelong learning policy will not be enough on its own to solve the serious problems of unemployment, social exclusion, poverty and under-development in certain regions, as well

as the mismatch between qualifications and skills in relation to the labour market's needs.

5. The ETUC considers that this new approach involves not only far-reaching changes as regards education and vocational training systems, which must be reformed, improved and modernised in order to satisfy the needs of the individual, of society and of the economy, but also requires greater co-operation between the different actors and new forms of management, information, consultation and participation, in order to contribute fully to the European objective of full employment, a better distribution of income, the promotion of high qualifications and to achieve a better balance between professional life and family life.
6. **The European strategy in favour of employment**, in which education and vocational training are a transversal objective in the employment guidelines, **the conclusions of the Lisbon Summit** (emphasising its importance for a successful transition to a knowledge-driven economy and society), **the conclusions of the Feira Summit** (inviting the Member States, the Commission and the social partners to define consistent strategies and practical measures to ensure that lifelong learning is accessible to everyone), **the conclusions of the Nice European Summit** and in particular the adoption of the Social Agenda and **those of the Stockholm European Council** (calling for an action plan in favour of lifelong learning to be presented to the Barcelona European Council in March 2002) and the **European Commission's Memorandum on Lifelong Learning**, can be considered as providing the basis for a new start and for a real European strategy guaranteeing the establishment and implementation of mechanisms to ensure that lifelong learning becomes a reality, as the ETUC has demanded for several years.
7. In its Communication to the Stockholm European Council entitled "Realising the European Union's potential", the Commission recognises the lack of progress achieved in the framework of the European employment strategy with regard to the implementation of lifelong learning, in particular with regard to the fixing of national objectives. The urgency of the challenge highlights the need to involve in a concrete way all the actors that share, albeit to differing degrees, the responsibility for lifelong learning at the different levels: the European institutions, the national public authorities, the social partners, the bodies responsible for education and training, as well as the individuals. Their roles and responsibilities, as well as their rights and duties must be clearly defined.
8. The time has come to translate words into actions, and in co-operation with its affiliated organisations, but also in the framework of the European social dialogue, the ETUC has clearly demonstrated its strong commitment to action.

Structural conditions required

9. The implementation of lifelong learning and its contribution to meeting the challenges of an increasingly complex social and political world, require that the appropriate structural conditions are established, in particular with regard to issues such as access, investment and partnerships.

Access to lifelong learning

10. For the ETUC, the first of these conditions concerns the recognition, at national and European levels, of the individual right of access to lifelong learning. Independently of their status, workers must be able to capitalise and transfer this right, especially in the context of increased geographical and professional mobility.
11. This individual right of access to each individual irrespective of his or her status must be collectively guaranteed and must be conceived in terms of time and resources. It implies a new vision of the "time" factor, culminating in establishing a better balance between time devoted to private life, work and apprenticeship, going beyond the objective of merely increasing employability, and also means devising innovative forms of investment and new ways of using the resources available. In addition, it must involve a redefinition of curricula, be of high quality, concern all phases of education and training (nursery school, primary school, secondary school, higher education, training for adults) and deal with questions such as the relations between formal, non-formal and informal education, while recognising the need for all individuals to receive ongoing training, irrespective of their age, their specific individual needs and the time and place when they acquire skills, which are increasingly diversified.
12. At company level, access is still very much restricted to those who already have a fairly high level of qualifications and access remains practically impossible for older workers, those with atypical contracts (in particular women), seasonal workers, ethnic minorities, disabled people or those having a low level of basic qualifications.
13. Access to lifelong learning is also closely linked to each individual's motivations: career advancement, with obtaining new qualifications, skills or a better salary, geographical or professional mobility, enhanced employability, the quality of the training available which must take account of previous training experiences, irrespective of whether they have been successful, or simply self-fulfilment.
14. Employers must also be motivated and consider access to lifelong learning in terms of its strategic potential as a way of improving a company's performance and labour relations.

15. Trade union organisations must also play an essential role in motivating employees with regard to the benefits of lifelong learning. Through collective bargaining or trade union training programmes at all levels, trade union organisations must contribute to increasing the awareness of workers and trade union delegates of the challenges posed by the knowledge-based society.

Increased investment in human resources

16. Meeting the challenges of the information society, where training is no longer limited to a single event, but becomes an integral part of life, where training satisfies not only a need to adapt to a job, a specific task or for reasons of career development, but also corresponds to the strategic objectives of a company or society and helps to enhance the employability of individuals and their social integration, implies greater personal motivation and investment, in terms of both quantity and quality.

17. Today, it is widely acknowledged that the level of investment of governments and employers in lifelong learning is far from adequate, both as regards more "traditional sectors" and ICT (research and development, software, telecommunications, etc.).

18. The level of public expenditure in the field of education continues to be far below the requisite level, in particular with regard to the commitments entered into at the Lisbon European Summit. Member States did not set specific targets in terms of a substantial annual increase in the percentage of GDP to be invested in the development of human resources.

19. The use of structural funds and notably the European Social Fund, as well as other Community programmes in the area of education, training, employment as well as R&D, confirms the need for concerted action at all levels involving the participation of all actors.

20. For the ETUC, the traditional model used for determining the responsibilities of the different actors in terms of investment needs to be revised: employers responsible for training within their company, individuals paying for personal training courses, the public authorities responsible for training for unemployed people and social excluded. The interests of companies and those of individuals as regards training are becoming increasingly inter-linked. The ETUC believes that the provision of concrete solutions for individual or collective needs as regards training, including in SMEs, requires new models and a combination of different sources of financing for lifelong learning. The situation of SME, specific because of their size and their need for qualified workers, must be taken into account in this context.

21. In this regard, the Memorandum on Lifelong Learning sets out a series of ideas and incentives, either for companies (in particular by way of tax breaks), or for individuals (learning accounts, subsidised training leave, systems of "competence insurance", etc.). The ETUC wishes to emphasise that an investment in human resources must not be seen as a cost for companies, but as investment enabling companies to innovate in terms of products and organisation, increase productivity and competitiveness, maintain and develop the employability of their employees, as well as providing a way of absorbing unemployed people into employment, as emphasised in the report drawn up by the Gyllenhammar high-level group on the management of industrial change.
22. However, recent research data obtained by the European Commission do not seem to confirm that companies are increasingly aware of such benefits. According to the data, 45% of blue-collar workers and 73.5% of white-collar workers use a computer in the normal course of their work; nevertheless, only 22% have received ICT training and only 16.7% have followed a training programme paid for by their company. This demonstrates clearly that individuals are financing their own training, without the support of the public authorities or employers. If employers persist in this policy, it will be very difficult, as the ETUC wishes, to include in the framework of the collective bargaining process at different levels, the implementation of the conditions to allow every worker to acquire, by the year 2003, an information society culture, as recommended by the employment guidelines.
23. Alongside the responsibility for financing from public authorities which remains essential, two major patterns are emerging as regards the question of investment: the use of collective funds, resulting from bipartite or tripartite agreements and the use of individual "learning accounts".
24. While recognising the need to implement an approach based on shared responsibility as regards the financing of lifelong learning, where the individual also has part of the responsibility, notably in relation to his or her own motivation and learning capacity, the ETUC cannot accept that the main responsibility for this financing should lie with the individual, thereby ignoring the primordial role and principal responsibility of the public authorities and employers in this area. Thus, the individual "learning accounts" are one of the elements of financing training and are above all appropriate for financing learning programmes freely chosen by the individual.
25. Moreover, this investment must not be limited to the "money" dimension. Alongside the financial resources, other resources must be taken into consideration, such as learning time, the recognition of the results of training and the organisation of work and training.

Time for training

26. Learning and training requires time, whether it be free time or working time. Thus, the lifelong learning policy and working time policy must be related and the social partners must negotiate a new balance between working time and training time.
27. While recognising the diversity of situations and practices at national level including the size of companies, ETUC considers that new models for the organisation of time in companies must be developed and negotiated through "time credits" for each worker, whereby for example, overtime is recorded in special "accounts" which can be used for rest periods or training periods that can be capitalised, leading to a distribution of training time between employers and workers, or alternatively through an agreement, negotiated with the social partners, fixing a minimum number of hours per year to be devoted to vocational training.
28. Training leave is another important instrument. Even if experience shows that, in order to be effective, this right must be linked to a human resources development policy and measures to provide information to participants, the ETUC considers that the right to be absent from work to follow a training programme is one of the cornerstones of the European social model and the construction of a knowledge-driven society. The right of individuals to training leave is an important part of any active labour market policy, in particular in the framework of any job rotation system, and can contribute to reducing unemployment and modernising the economy.

The recognition of the results of learning: formal, non formal and informal learning

29. Promoting the recognition of the results of learning is a complex but very important task, to the extent that it is a way of guaranteeing the transferability of qualifications to other work contexts, other companies, or within the context of geographical mobility, thereby contributing to individual motivation and employability.
30. The ETUC considers that the solution to this challenge lies in the training policy itself, together with collective bargaining and the reorganisation of work.
31. Non-formal learning, notably that acquired in the workplace, will become as important as formal learning. A successful lifelong learning policy implies above all meeting its cultural challenge, increasing awareness of its needs among all the actors and above all in establishing greater co-operation between employers and trade unions in the field of learning at the workplace.

32. Ensuring the recognition of the skills and qualifications obtained in a non-formal context, as well as the “accreditation of prior learning” (acquired at work or in another context) falls within the scope of the responsibilities of the social partners, at the most appropriate levels; this means that they must be in a position to contribute to the definition, accreditation and recognition of such by the institutions responsible for education and training, as well as their inclusion in national systems.

The organisation of work and training

33. A new organisation of work implies the creation of conditions that are favourable to learning in the workplace.

34. The identification of needs in terms of training and qualifications within the company, together with the information, consultation and active participation of workers and their representatives, is a key element in a modern human resources development strategy, leading to the promotion of a high level of skills within the company, increased productivity and competitiveness, as well as the development of “learning organisations”. These results must translate into greater motivation among employees, an increase in the quality and safety of jobs, as well as a new definition of pay systems.

35. The ETUC believes that the social partners must negotiate several instruments to facilitate the identification of training needs as well as access for everyone to lifelong learning within companies: the establishment of training plans, the identification of the company’s needs as well as individual needs, through regular skill evaluation programmes, are clearly part of this strategy.

A new partnership concept

36. For the ETUC, a strong and dynamic partnership between all the actors concerned in the promotion of lifelong learning is a fundamental condition for the successful implementation of the policies.

37. While recognising the shared responsibility of individuals, the social partners and the bodies responsible for education and training, the public authorities at different levels are responsible for ensuring social equality, through consistent policies, appropriate financing, equal access, the quality of educational and vocational training systems, as well as their capacity to anticipate and adapt to changes and new requirements.

The role of education and vocational training systems – skills for every individual

38. The systems must provide the right answers at the right time in order to satisfy individual needs and those of the economy and of society.

39. The changeover from the concept of learning being limited in time to seeing all learning as a seamless continuum, with the dimension of such learning and the time devoted to it being an integral part of reconciling professional life and private life, means attaching increasing importance to the decisive role that information, guidance, support and advice must play, as a service permanently accessible to all and increasingly tailored to the needs of individuals.
40. The ETUC considers that it is necessary to analyse existing services with a view to making them more consistent and efficient with regard to the new needs, by consolidating the links between the different types of learning, between school and the world of work, and by establishing a closer relationship with the social partners, in order to reduce the mismatch between supply and demand in terms of qualifications.
41. It is also necessary to ensure greater mobility and more flexible options between the different educational channels, including at university level, and vocational training, through the promotion of modular systems.
42. The ETUC considers that the education and training systems must also develop new approaches in relation to their capacity to provide each individual with the "traditional" basic skills, as well as the new technical and social skills, essential to the construction of the knowledge-based society.
43. Local authorities remain primarily responsible for basic education, in terms of quality as well as access. Young people must succeed at school and in their initial training, which should provide them with comprehensive basic skills. They must also obtain adequate basic qualifications that are recognised by the labour market, including linguistic, technological and social skills. Adults with low levels of qualifications must have the right to acquire a basic education equivalent to that of young people completing their compulsory schooling.
44. A common framework must be established at European level in order to define the new basic skills, while recognising that technical skills must be part of a wider programme of general social and employment-related skills, that supplement specialist know-how.
45. While recognising the importance of the new ICT skills, the ETUC wishes to point out that the so-called "traditional" sectors of the economy also have new needs in terms of skills and qualifications, in particular in areas concerning social needs which are as yet not adequately satisfied, such as for example care to elderly people or to children or in relation to the development of active European citizenship, characterised by common values and by the construction of an increasingly multicultural and multilingual society.

46. The ETUC considers that the dynamism and the ongoing evolution of the knowledge-based economy require an equally dynamic analysis in terms of qualifications needs. In order to be able to respond to present and future needs, it is necessary to create tools for anticipating changes; this is a prerequisite for monitoring needs in terms of skills and qualification and establishing appropriate guidelines, instead of allowing them to be determined by purely technical factors.
47. Europe is faced with a skills gap and a mismatch between the professional qualifications available on the market and the needs of several sectors in the "new economy". Beyond the projections, which indicate that in 2003 the skills gap in these sectors is expected to involve around 1.7 million jobs, it is essential that, in the framework of the European employment strategy, measures are taken in order to reintegrate into the labour market all those people who are currently excluded from the market, through appropriate guidance and vocational training measures, thereby helping to reduce skills gaps as well as unemployment.
48. Accordingly, the ETUC agrees that there is a need to anticipate changes and identify new needs in terms of skills, by relying above all on the new European Observatory on changes, as well as on a wide range of bodies at European and national levels, in which the social partners must play an active role.

Innovation in teaching and training methods - the role of teachers and trainers

49. The development of new teaching and training methods, capable of meeting individual needs implies teaching material with contents suited to the needs and learning speeds of the different target groups and the growing use of ICT, as well as the expansion of different forms of training, as is the case for e-learning. The ETUC considers that the consolidation of infrastructures and access to ICT, with the need to ensure at the same time the quality of the methods and contents, is a major challenge.
50. Over and above this major concern as regards quality, the new methods must motivate, encourage the development of a critical mind and stimulate the commitment and active or interactive participation of not only the students, but also of teachers and trainers. They also have a significant impact on the organisation of work of teachers, trainers and other people employed in the education sector; this organisation of work must be the subject of negotiations between the social partners. In this case, there is an urgent need to develop appropriate ICT qualifications for teachers and trainers.

51. Several European countries are faced with the problem of a lack of skilled workers in several sectors, notably in the areas of education and training. This situation requires a co-ordinated response at the level of the Member States and the European Union. Over the next ten years, approximately two million teachers and trainers must be trained and recruited merely for the formal education sector. This situation represents an opportunity to promote the European dimension in this profession, while respecting the national responsibility. The European Union should set up a European Teacher Training Institute with, as its main task, the promotion of mobility and co-operation between national institutes in areas such as research, as well as the exchange of good practices and supplementary training courses.

Bringing learning closer to home

52. The ETUC considers that it is of the greatest importance to bring learning closer to home and that this concern should guide all policies and economic development and social cohesion actions. It is necessary, as part of the European employment strategy, to set up local learning centres offering a wide range of skills, and also to establish, at local and regional level, mutually beneficial partnerships, including in particular the implementation of territorial and local employment pacts. This will make it possible to optimise the use of existing infrastructures, identify needs in terms of new infrastructures, both socially, thereby making a genuine contribution to the promotion of equal opportunities, and as regards ICT, the cost of access to which must be reduced. Basing the future of lifelong learning on the local dimension also means taking into account the role of companies, as well as increasing the responsibilities of the social partners to take into consideration the needs of the labour market and the present and future development of sources of employment.

The specific role of the social partners

53. The main responsibility of the implementation of lifelong learning within companies lies with the social partners, with collective bargaining being the ideal procedure for identifying the conditions that are conducive to the promotion of access to lifelong learning and to the development of qualifications and skills for all employees, in particular those who have lower levels of qualifications, women, older workers and those who have atypical contracts.

54. The experience developed in the framework of the social dialogue at national and European levels shows that there is a large consensus in concerning any analysis of the outstanding problems and the challenges which need to be faced. Nevertheless, this consensus is more difficult when it comes to identifying ideas for joint actions, with a view to defining new rights and new responsibilities in implementing lifelong learning.

55. Since 1991, the ETUC has proposed to employers at European level the negotiation of a voluntary agreement on access to lifelong learning, but they have always rejected the idea.
56. The ETUC considers that the social partners at European level must assume their own responsibilities in this area, defining jointly principles and lines of action and committing themselves to putting forward recommendations to be implemented by their respective organisations at national level.
57. The ETUC takes very seriously the work carried out to date in the framework of the *ad hoc* Education-Training group of the Social Dialogue. This work should result in a framework agreement on the modalities for facilitating access of workers to lifelong learning.

EG/MHA-28/06/2001

PART THREE



EUROPEAN ASSOCIATION OF CRAFT, SMALL AND MEDIUM-SIZED ENTERPRISES

UEAPME position paper on the Commission Memorandum on Lifelong Learning

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UNION EUROPEENNE DE L'ARTISANAT ET DES PETITES ET MOYENNES ENTREPRISES
EUROPÄISCHE UNION DES HANDWERKS UND DER KLEIN- UND MITTELBETRIEBE
EUROPEAN ASSOCIATION OF CRAFT, SMALL AND MEDIUM-SIZED ENTERPRISES
UNIONE EUROPEA DELL' ARTIGIANATO E DELLE PICCOLE E MEDIE IMPRESE

UEAPME position paper

European Commission Memorandum on Lifelong Learning

Background

In a society with continuing economic and social changes, spurred on by the globalisation process and technological developments, life-long learning plays an increasingly important role. In fact, a society based on continuous learning is necessary to meet the new challenges.

Enterprises, and especially SMEs, are increasingly **dependent on the skills** and commitment of each individual employee. Therefore good working conditions and commercial success are directly and totally interdependent. These new developments have a powerful impact also on traditional manufacturing industries and service enterprises.

Competition is intensifying in an ever more international market. Enterprises must constantly improve the quality of their products and/or their services. Workers are obliged to acquire new knowledge and to learn new methods.

Without sufficient people having **adequate skills**, the ability of enterprises to remain competitive and grow is threatened. This is particularly true for craft, trades and SMEs, which make up 99.7 % of the businesses in Europe and which are traditionally more sensitive to economic and social changes than big industry.

Shortage of skilled labour is one of the major problems for SMEs and in particular for small enterprises. Without a properly functioning labour market this lack of access to skilled labour will put a long term constraint on the growth of SMEs. In the EU, there are almost 20 million SMEs, which employ around 117 million persons with an average of 6 workers per enterprise. They constitute a very important part of the economy both on a local and national level, as well as for the growth of the European Union economy. The number of SMEs is expected to increase by almost 8 % between the years 2000 and 2005. (The European Observatory for SMEs, Sixth Report)

SMEs have some **distinctive characteristics** which mark them out from big business. This has until now not been sufficiently recognised and there is not enough research in this field. In a small business the owner is very visible. She or he is present in the workplace and has a constant dialogue with the employees. The enterprise is very flexible, the decision process is short, and when there is a need for change it must be quickly carried out. Most of the staff have a variety of skills, by necessity. At least a third of the SMEs provide training activities and skills development in the workplace in a non-formal way. SMEs are also important providers of apprenticeship or on the job training for young people.

Training and lifelong learning has to be a **shared responsibility** between the government, social partners, enterprises and individuals. Due to the different systems in the Member States both in vocational training and further training and participation of organisations in the social dialogue, small enterprises are not always represented by the social partners. Therefore additional consultation is needed to ensure that the small enterprise aspect is included on all levels of training and further training.

Governments are responsible for providing sound structures and foundations for education, training and further training but in the end learning is a shared responsibility where the individual has to make the most of her or his opportunities.

Informal learning strategies are of particular importance for SMEs. Owing to their size, craft, trades and SMEs often encounter greater difficulties in organising outside training, for entrepreneurs, employees and trainees/apprentices. For this reason, they have been able to develop new strategies for the improvement of professional skills at work. Although the importance of formal skills cannot be disregarded, for skills learned by doing, there is an evident lack of visibility. Social partners can play a role in solving the problem of the certification and recognition of competencies acquired at work, including the consideration of the ability of SME owners/managers to accredit or certify the skills of their own employees, bearing in mind the need to maintain consistently high standards of qualification. The documentation and dissemination of good practices in this field, as well as the transfer of experiences, should be promoted.

The role of UEAPME is, with its member organisations, to promote common actions, to co-ordinate projects and seminars and to disseminate the results. The increased transparency and knowledge through the exchange of strategies, structures, and methods of how to make informal and non-formal learning visible and finding methods of closing the skills gap is of utmost importance especially for small enterprises.

UEAPME has been co-ordinator and project leader for a number of successful projects supported by the Commission, both within the Leonardo da Vinci programme and the European Social Fund, in the area of vocational training. The European Practical Guide to on-off the job training systems, PRASME, gives an overview of vocational training systems in 7 Member States and Estonia. This guide increases comparison between systems for young people and others involved in vocational training.

The project, Quality in Apprenticeship, is a scientific study of apprenticeship systems in the 15 EU Member States measured against the 11 quality criteria developed by the UEAPME members. This is a unique study which shows, not only the present situation in each country but also how they perceive the future for apprenticeship training.

A number of other projects have also covered different aspects of training from an SME perspective since this area is of vital importance to our members, the small enterprises.

General comments

The concept of lifelong learning covering formal education and training (initial education and vocational training, higher and academic education) informal and non-formal learning (taking place in the workplace, in society, during the whole life span) for the first time also recognizes the training activities taking place in small enterprises. This is an important recognition since it creates a basis for further knowledge of these activities.

Within the lifelong learning concept there is also a need to consider the roles of the different national education and training systems. In most Member States basic schooling which leads to university studies seems to be promoted more than vocational training. There is certainly a need for both skilled workers and those with a university degree, but the student must be given the opportunity to make an informed choice, therefore both systems must be promoted equally. Vocational training and apprenticeships give an all round education with both theoretical and practical training. This distorted situation needs to be explored further, both because of the increasing shortage of skilled workers and because of the high unemployment rate.

UEAPME wants to stress that **education and training are still the responsibility of the Member States** and the principle of subsidiarity, again referred to in the Lisbon Summit Conclusions, should continue to be the basis of activity in this field. Having stated this, UEAPME realises the need for a number of initiatives on the European level and the need for co-operation and transparency.

UEAPME believes that continuous training - if related to growth and development - has to be an **opportunity for the entire SME work force**, equally open to entrepreneurs as to highly qualified and less qualified employees. Both workers and businesses should bear the responsibility for this kind of continuing training. When the training is work related and initiated by the employer the responsibility of financing is with the enterprise. If learning is of a more general nature there is a need for further reflection on the financing aspects. The role of public authorities should also be included in this.

Continuous training is very important for entrepreneurs since they need to acquire new skills in order to be able to face the new challenges of globalisation and the information society. The owner of a small enterprise also needs new knowledge in other tasks concerning the enterprise, accounting, new legislation, personnel management, maintenance, etc. Entrepreneurs in smaller enterprises have more difficulties than in larger ones in finding time and money for the development of these skills, which are so important for the competitiveness of their enterprises.

Regional organisations, training centres, as well as sectorial organisations have an important role to play in determining the needs for skills improvement and addressing those needs. The need for skills 'just in time' is especially important in small enterprises. Therefore the need for diversity, flexibility and accessibility is of great importance.

The **use of new methods**, such as using ICT for distance and interactive learning must be promoted. Individuals should be encouraged and given incentives to improve knowledge and skills not only in the workplace. Any barrier which hinders this will to learn should as far as possible be removed.

It is important that also the small enterprises' opinion should be taken into account when new methods, structures and systems are agreed on. There is a need for **increased understanding of small enterprises and crafts**, the environment in which they develop and grow, and how they function as a work organisation.

In the Memorandum on Lifelong Learning the Commission emphasises the importance of the right of every person to continuous learning and training throughout their lives. UEAPME can agree with the fact that personal development is very important. Nevertheless, we would like to stress the **responsibility of the individual** to develop their own competencies and their skills.

In this paper UEAPME will concentrate its comments on **the need for new and developed skills**, to meet the future needs of small and medium sized enterprises. In doing this, we also recognise the need for the SME sector to be more involved in the development of initial education and training. UEAPME is moreover convinced that education and training should remain a national competence and that the European level should concentrate on making systems visible, find instruments to further the mobility of the work force, and improving SME participation by finding basic quality criteria and methods to ascertain improvement of recognition of certificates and diplomas.

Since there exist no statistics and no reliable way to evaluate the non-formal training continuously going on in small enterprises, its visibility has remained poor. There is therefore a **need for further knowledge in this field** and also to find ways to evaluate informal training. Training provided by institutes is very often unsuited to small enterprises. The times and places for the courses are too inflexible; they require the staff to be away from work for too long periods of time, the content is too theoretical and too formal. All together this means that if alternatives do not exist, even the training courses or programs available will not be used by the small enterprises.

Comments on the Key messages of the Memorandum:

1. New basic skills for all

Initial education and training is the responsibility of the Member States. UEAPME believes that a solid foundation for basic skills as an essential prerequisite for continuous learning has to take place in schools, even down to Primary level, and during initial vocational training either in companies or in schools or training centres.

The importance of new skills is recognised by UEAPME, and they include among others, ICT skills, languages, entrepreneurship and social skills. The need for new and improved basic skills must be addressed by governments and it is of importance that governments take into account the improvements suggested by the Employers organisations. New forms and methods of training have to be adopted, and access has to be improved. The individual's need to train and retrain throughout life also implies that there is an onus on the individual to take advantage of the opportunities. For the enterprise, the need for new and improved skills must be met through a variety of innovative methods.

2. More investment in human resources

UEAPME agrees that the level of investment in human resources is too low. Governments and the social partners have a responsibility in creating the overall environment for improvement in this field. However, the element of individual responsibility to improve knowledge and skills remains.

There could be a number of incentives for both employers and employees to improve knowledge and skills. However, one solution will not fit all. This has to be solved on company, or individual

level. There could also be fiscal incentives but this is within the competence of the individual Member State.

UEAPME recognises that special attention, according to the needs of the local or regional labour market, must be paid to older workers, to the less qualified and to women entering the labour force. It is essential to develop strategies that also include improving older employees' skills. In crafts, trade and small enterprises, older employees can ensure the transfer of knowledge and know-how related to lengthy work experience. For the less qualified, immigrant workers, or adults without any diplomas/certifications, incentives should be given especially by public authorities. For part-time workers, often women, special strategies have to be developed. There must be a shared responsibility to find incentives which will attract participation from these groups and others which might be less motivated to participate in learning activities. In many cases learning on the job could prove sufficient, certainly in SMEs. UEAPME believes that strategies for "learning organisations" can answer to some of these needs.

3. Innovation in teaching and learning

UEAPME agrees with the Commission that there is a need for introducing new basic skills and for new methods in education and training. However the "old" basic skills cannot be disregarded. Moreover, there is a need for new and improved training of teachers and trainers. The Member States have a responsibility to provide up-to-date knowledge and skills for teachers in the national education systems and to assist in improving pedagogical methods and curricula. A high quality basic education constitutes the basis for further training and lifelong learning.

SMEs have a long tradition of participation in vocational training, on-the job training and apprenticeship. These forms of training are used to different degrees in the Member States. Dual systems where training institutes and enterprises co-operate in training improves both practical and theoretical skills, and gives the individual better opportunities on the labour market.

To facilitate developing national training systems the UEAPME member associations have created 11 quality criteria for apprenticeship. These criteria have been tested in all the Member States and are considered to be of great value in determining quality training. This method could be used also in other areas of training as a means of creating transparency between systems and to give national authorities incentives for improvement, where needed.

4. Valuing learning

The continuously ongoing informal training and improvement of skills in small enterprises has not, until now, been recognised. The general view has therefore been that, because employees in SMEs participate in training outside the workplace to a lesser degree than other workers, there is less training. Since this is not the case, methods to value informal learning must be introduced. Studies in both the UK and Sweden show that there is a considerable amount of on the job training in the small enterprises whereas in enterprises with more than 100 employees most training activities take place externally, or through defined in-house training programmes that are more easily co-ordinated with formal external training provision.

Existing systems of valuing competence do not take into account the ongoing development of skills in small enterprises. Diplomas and certificates are mainly verification of knowledge in a specific area and do not recognise transversal skills, which become increasingly important for the whole

workforce. UEAPME therefore stresses that the development of systems for valuing informal skills is of the utmost importance, especially by owners/managers themselves.

5. Rethinking guidance and counselling

UEAPME agrees with the Commission in that there is a need for improved guidance and counselling. Information and advice of good quality is essential for the individual, and for the entrepreneur to make a satisfactory choice. This is important not only in choosing a profession but also in changes in careers and profession throughout life. In this field the public sector has a responsibility but also sectorial organisations and regional centres could play an important role. An exchange of good practise and methods between Member States could be of value.

6. Bringing learning closer to home

In bringing learning closer to home the use of ICT must play an important role. Methods and systems for distance learning for individuals are now readily available. The possibility for each individual to use PCs not only in the workplace but also in schools, training centres, public institutions and internet cafes increase. Having stated this there will be for a long time to come, a need for improved access to more conventional courses and further training opportunities. This is also the responsibility of the Member States. The Employers organisations and the unions have a responsibility to point out the needs and which developments are needed for the future.

Summary

It must be recognised that small enterprise needs are different than big ones both in structure, management and organisation.

For lifelong learning to be successful, activities must also include the entrepreneur.

SMEs must be consulted and represented in planning and implementing initial vocational training programmes, further training and retraining

The skills needed in small enterprises are usually developed within the enterprise. Existing systems are too inflexible and too expensive to be used. More flexible systems and increased use of interactive, distance learning methods need to be developed.

Informal learning and on the job training are not visible and therefore not sufficiently valued. Development of systems for valuing informal skills is of the utmost importance.

Flexibility and rapid changes are needed in the training offer. Training offers need to be regional, sectorial, easily accessible, and tailored to the small enterprise needs.

Guidance and counselling must be improved. Good practice and benchmarking should be used to promote improvement.

Brussels in July 2001

PART FOUR

UNICE

THE VOICE OF BUSINESS IN EUROPE

UNION OF INDUSTRIAL AND EMPLOYERS' CONFEDERATIONS OF EUROPE

UNICE position paper on the Commission Memorandum on Lifelong Learning

COMMISSION MEMORANDUM ON LIFELONG LEARNING

UNICE POSITION PAPER

Executive summary

With its emphasis on the knowledge economy, the Lisbon European Council has triggered a new focus on lifelong learning in Europe.

UNICE fully agrees that lifelong learning is essential to promote economic competitiveness, employability and active citizenship. It broadly welcomes the Memorandum on lifelong learning which aims to define a strategy for lifelong learning. However, it stresses that the main responsibility for developing lifelong learning is national. Only if training offers correspond to companies' needs will employability and competitiveness be enhanced. As there is no one-size-fits-all solution in this respect, the proposed strategy should include exchanges of experiences.

In terms of content, employers believe that the envisaged strategy should seek to raise the demand for - and reduce barriers to - lifelong learning, improve national education and training systems and tackle high levels of illiteracy, and promote effective investment. How to meet emerging skills needs is a major challenge and increasing competences in new basic skills is important, but it should not be at the expense of traditional basic skills.

Employers are committed to identifying ways to develop ongoing access to learning and skills development. They support the objective of promoting investment in human resources through formal and non-formal training schemes. However instituting an individual legal right to lifelong learning is not an inappropriate tool to widen access to learning. Instead one should focus on the more practical questions of motivation, access and barriers to people – particularly the low qualified – upgrading their skills. To be effective, the strategy for lifelong learning should give priority to tackling issues such as the lack of interest among individuals, time constraints, course fees and the lack of awareness of learning opportunities, etc. It should aim at promoting conditions that will motivate not only companies but also individuals, who also have a responsibility for their own employability, through incentive measures to encourage both financial investment and commitment to learning.

Diplomas, certificates and qualifications are important. The key challenge for the future is how to make competences acquired formally and informally visible and recognisable as this is a pre-requisite for labour and cross-border mobility.

A shift from a supply-side approach to a demand-side approach to guidance and counselling is needed. Everyone should have easy access to good quality information and advice throughout their working lives. Private initiatives, market-based services and social partners actions have to be taken into consideration as ways to accompany individuals throughout their professional life.

Employers welcome the emphasis on partnership. Social partners' agreements can be useful. However, other forms of cooperation or partnerships between players deserve equal attention.

COMMISSION MEMORANDUM ON LIFELONG LEARNING

UNICE POSITION PAPER

Introduction

1. With its emphasis on the knowledge economy, the Lisbon European Council has triggered a new focus on lifelong learning in Europe. At the end of October 2000, the Commission put forward a Memorandum on Lifelong Learning, which aims to identify a strategy for lifelong learning.
2. UNICE warmly welcomes this debate, as updating of knowledge, skills and competencies is crucial to the competitiveness of European companies.
3. The Commission proposes six key messages, which suggest that a coherent life long learning strategy for Europe should:
 - guarantee universal and continuing access to learning,
 - raise levels of investment in human resources,
 - develop effective teaching and learning methods,
 - improve the way in which non-formal learning is understood and appreciated,
 - ensure good quality guidance and counselling,
 - provide life long learning opportunities closer to home through ICT.
4. The memorandum aims at a framework of partnership that will allow to base lifelong learning on a shared responsibility among all players (Member States, EU institutions, social partners, local authorities, enterprises, individuals, NGOs, the world of education and training, etc.).

General comments

5. UNICE fully agrees that lifelong learning is essential to promote economic competitiveness, employability and active citizenship. Employers can broadly welcome the objectives of the Memorandum. However, they believe that the envisaged strategy should take full account of the fact that the main responsibility for developing lifelong learning is national and should be based on the following principles:
 - Develop a learning culture that reduces barriers to lifelong learning and promotes new basic skills: UNICE agrees that every individual should be able to access opportunities to learn and to acquire basic qualifications and key skills, in initial education and training and in continuing vocational training. Therefore, UNICE believes that a major challenge is now to find how to raise the demand for, broaden the access and reduce barriers to, lifelong learning and new basic skills.

- Develop national systems to take up the challenges from lifelong learning: The proposed strategy should put particular emphasis on improving national education and training systems and tackling high levels of illiteracy and innumeracy throughout Europe.
 - Give a comprehensive view of resources used for lifelong learning systems in education and training, and in learning at the work place: Whilst sustained investment in education and training is key, the real priority is to make sure that investment is effective and efficient. The proposed strategy should therefore aim at promoting effective and efficient investment in human resources.
 - Underline the necessity for the individual to take up responsibility for lifelong learning: In addition to asking employers to meet skills needs, it is critical to put great emphasis on the responsibilities of individuals for their own employability and lifelong learning.
6. Finally, some of the terminology used in the memorandum is confusing and some proposed concepts should be clarified. For example, the reference to “lifewide” learning is confusing. The delineation between ‘non-formal’ and ‘informal’ learning is also difficult to understand. UNICE believes that it would be better to stick to the terminology of “lifelong learning” and to the distinction between “formal” and “non-formal” learning.

Detailed comments

Key message 1: new basic skills for all

What can be done to cope with ceaseless demands to adapt existing curricula to new needs?

7. In a world characterised by continuous change, school and college curricula must constantly adapt to new needs. One way of coping with this pressure is to ensure that foundation education and training effectively equip people with basic skills that will allow them to learn throughout their working lives. These basic skills include:
- values and attitudes that are needed to participate actively in economic and social activities which are an integral part of working,
 - numeracy and literacy,
 - key skills (social skills, ICT skills, problem-solving skills),
 - intercultural skills including language skills.

Periodically checking that the content of curricula is adequate to equip people with basic skills will always be necessary. However, if the basic skills content is broadly appropriate, it will be easier to focus efforts on those aspects of curricula designed to equip people with up-to-date job specific skills, which usually require more frequent updating.

8. Finally, European employers would like to emphasise that, while they strongly support the Commission’s plea to increase competences in “new” basic skills, this should not be at the expense of traditional basic skills, where there are still serious problems. The levels of illiteracy and innumeracy in many Member States remain too high. Governments must tackle this issue without delay. Failing that, ambitious initiatives to upgrade “new” basic skills, or any type of lifelong learning, have a slim prospect of success.

Can an individual right to life long learning be envisaged?

9. UNICE feels that access to lifelong learning should be promoted. It is committed to identifying ways to develop ongoing access to learning and developing skills. However the European employers are opposed to instituting an individual legal right to lifelong learning as it is an inappropriate tool to widen access to learning, for three main reasons:
- Firstly, it is highly probable that the people who would make use of an individual legal right to lifelong learning would not be those most in need of better access to education and training opportunities. This is backed up by evidence from those Member States, which do operate rights to time off to study, and where the higher skilled employees predominantly take up rights to training.
 - Secondly, the type of training undertaken under such schemes often has little direct relevance to the workplace.
 - Thirdly, it is difficult to see how it would be possible to give effect to such an individual legal right, as it is unclear who would have responsibility for it. For example, if individuals believed their 'right' to lifelong learning had been violated, who would they take a case against?
10. Given that an individual legal right to lifelong learning would not reach the appropriate target groups (i.e. low-skilled) and would be extremely difficult to put into legal effect, UNICE recommends a focus on the more practical questions of motivation, access and barriers to people – particularly the low-qualified – upgrading their skills.
11. Employee skills development is a shared responsibility of the employer and the individual. This means that the aim of a strategy for lifelong learning is to create the conditions that will motivate companies and individuals to live up to their responsibility. Research stresses that the lack of interest of individuals themselves is a key barrier to skills development. Other obstacles to learning include the constraints of time, course fees and lack of awareness of learning opportunities. Any strategy for lifelong learning should give priority to tackling these obstacles.

How can access to adult vocational training be improved, in particular for older workers, part-timers, temporary workers and the unemployed?

12. The Memorandum stresses the importance of improving access to adult vocational training, in particular for older workers, part-timers, temporary workers and the unemployed. UNICE believes that the best way to achieve this would be through identification of the practical obstacles encountered by these categories of workers in each country, followed by monitoring and sharing experiences on solutions found in each individual Member State.
13. Concerning part-time work and temporary work, the memorandum establishes a link between the flexibility of working time stemming from these forms of work and the possibility to expand time for learning. UNICE agrees that this link exists in specific cases. However, employers would also like to stress that part-time work and temporary work are a way to avoid unnecessary career breaks and, hence, are a tool for informal learning. Facilitating these flexible forms of work must therefore be taken into consideration in the context of a strategy for lifelong learning.

What could be effective ways of monitoring and meeting emerging skills needs?

14. Only if training offers corresponds to companies' needs will employability and competitiveness be enhanced. The Memorandum therefore rightly raises the question of monitoring and meeting emerging skills needs. However, there is no one-size-fits-all solution. A strategy for lifelong learning should include exchange of experiences.
15. The newly created observatory of change on the one hand, and the high level task force on mobility and skills on the other hand, could be useful tools to help identifying some trends in terms of emerging skills needs. However, UNICE would like to stress that
 - the company level is crucial to identify competences and skills needs;
 - the further you move away from the enterprise, the more difficult it is to predict skills needs;
 - inaccurate forecasts can have the devastating effect of producing, instead of preventing, unemployment.

Extreme caution should therefore be recommended when drawing conclusions from identified emerging needs.

Key message 2: more investment in human resources

16. UNICE fully supports the objective of promoting investment in human resources. However, the figures available only trace investment in formal training schemes and therefore do not reflect the investment in human resources in non-formal learning spent by companies and individuals. Ways must be found to make that investment transparent in order to reflect a total investment in human resources. Moreover the issue of how to improve the outcomes of investment is more important than a simple quantitative approach.
17. UNICE agrees that:
 - it is necessary to rethink what counts as investment in order to promote investment in human resources,
 - no single solution is feasible, or desirable in this respect,
 - benchmarking good national practices could help spread innovative solutions across Europe.
18. The memorandum refers to a variety of interesting incentive measures aimed at encouraging both financial investment and commitment to learning. UNICE fully supports this approach.
19. No fiscal restraints should be put on companies' or individuals' investment in human resources. Fiscal incentives to investment in this field are the competence of governments. Decisions on accounting rules and fiscal regimes are not part of the negotiating competences of social partners. Social partners' agreements would therefore not be an appropriate form of action in these fields.
20. Instituting a European award for innovative initiatives to that effect could add value. As the Commission rightly says, encouraging and enabling individuals to co-fund and take control of their own learning is crucial for success. It may be better not to restrict the

envisaged award to company initiatives only, so as not to exclude relevant initiatives by other players.

21. UNICE welcomes the emphasis on partnership in the document. Social partners agreements can have an important impact on learning. However, negotiating on training is only a part of a lifelong learning strategy and other forms of cooperation or partnerships between players deserve equal attention.

Key message 3: innovation in teaching and learning

22. ICT-based learning offers great potential and deserves special attention when a lifelong learning strategy is being developed. For companies, they can reduce the cost of learning and optimise investment in human resources. For individuals, learning at a distance allows to optimise the use of the time devoted to training and can reduce obstacles to people engaging in training activities.
23. However, as the memorandum rightly points out, learning is ultimately a social process and the fact that a work has to do with teaching and learning is often not recognised explicitly. Consideration within the strategy of lifelong learning should therefore be given to develop a better understanding of the implications of distance learning as a social process.

Key message 4: valuing learning

24. UNICE fully agrees that an important task of education and training systems is to make learning visible and recognisable. Diplomas, certificates and qualifications are important and having transparent and easily recognisable qualifications is a pre-requisite for labour mobility. However, contrary to what is stated in the memorandum, UNICE is not convinced that the rising importance of this issue is due to "a much higher demand for recognised learning than before". Rather, the perceived rise in demand seems due to the fact that a rising proportion of competences are acquired informally and that existing systems are not designed to make them visible. The key challenge for the future is how to make competences acquired informally visible and recognisable. Employers regret that, despite explicit references to informal or non-formal learning, the memorandum seems to limit the debate to "competencies acquired in youth or community associations" and does not really propose articulated ideas for debate on this crucial issue.
25. Ensuring transparency and mutual recognition of formal national qualifications at EU level to promote cross-border mobility is also an important challenge in the context of a strategy for lifelong learning. Employers support initiatives such as the European credit transfer scheme (ECTS), Europass, European computer driving licence and development of a European diploma for basic IT skills. However, they have still some doubts about the usefulness of the European CV proposed in Lisbon. Moreover, if a European CV is to be developed, it is important to reinforce the convergence of this CV and the electronic CV of EURES jobseekers database to avoid any duplication and inconsistencies.

Key message 5: guidance and counselling

26. UNICE welcomes the fact that the Memorandum clearly states that a new approach to guidance and counselling is needed in order to ensure that everyone has easy access to good quality information and advice throughout their working lives.

27. UNICE agrees that a new approach on guidance and counselling should express a shift from a supply-side approach to a demand-side approach.
28. The public sector has an important responsibility in this respect. However, developing guidance and counselling throughout the working life implies that private initiatives, market-based services and social partners actions have to be taken into consideration as ways to accompany individuals throughout their professional life.

Key message 6: bringing learning closer to home

29. UNICE believes that this debate is linked to the debate around key message 3 and therefore both issues should be dealt with together when a strategy for lifelong learning is being developed.
30. Moreover, some of the ideas suggested in this section are still too theoretical and insufficiently thought through in operational terms to give meaningful answers.
31. Finally, while turning schools and training centres into multi-purpose local learning centres, UNICE suggests that innovation in teaching and learning and bringing learning closer to home should respect the priority role of schools and centres for their respective core audiences.

Conclusion

32. To summarise, UNICE would support a strategy for lifelong learning which takes into account the fact that the main responsibility for developing lifelong learning is national and based on principles developed in paragraph 5.
33. Employers believe that the issues raised under the six key messages proposed by the Commission are broadly the right ones. However, they would suggest a regrouping of key messages 3 and 6.
34. UNICE is aware that the set of messages proposed aim at defining a balanced strategy for life long learning. UNICE therefore recommends that a balance is maintained when conclusions are drawn from the debate and that the emphasis is placed on motivation and practical ways to reduce real obstacles to lifelong learning.
35. UNICE would like to draw attention to the ongoing discussions on the promotion of lifelong learning with ETUC in the context of the social dialogue at EU level. The result of this work will complement the conclusions of the Lisbon summit as well as the ideas presented in the Memorandum.

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