

Ministerie van Onderwijs, Cultuur en
Wetenschap

>Retouradres Postbus 16375 2500 BJ Den Haag

De voorzitter van de Eerste Kamer der Staten-Generaal
Postbus 20017
2500 EA DEN HAAG

Internationaal Beleid

Rijnstraat 50
Den Haag
Postbus 16375
2500 BJ Den Haag
www.rijksoverheid.nl

Onze referentie

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Bijlagen

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De Europese Commissie heeft op 20 april 2021 een consultatie geopend over de inhoud van een gezamenlijke aanpak rondom zogenaamde microcredentials. De ontwikkeling hiervan is eerder aangekondigd in de Vaardighedenagenda¹, de mededeling over de Europese Onderwijsruimte² en het Commissiewerkprogramma 2021³.

Met deze brief informeer ik uw Kamer – in lijn met de gemaakte afspraken over informatievoorziening over Europese besluitvorming - over het bijgesloten position paper. Hierin wil Nederland in reactie op deze consultatie proactief een aantal Nederlandse aandachtspunten bij de Commissie onder de aandacht te brengen. De Nederlandse reactie is conform het staande kabinetsbeleid.

Microcredentials refereren aan mini-kwalificaties met betrekking tot kennis en vaardigheden in een bepaald vakgebied. In het kader van flexibeler onderwijs dat een antwoord biedt op een toenemende noodzaak van om- en bijscholing en leven lang ontwikkelen, neemt het gebruik hiervan toe. Vooral nog bestaat er echter geen breed gedeelde definitie en erkenning. Een Europese aanpak, inclusief een gedeelde definitie, moet bijdragen aan een manier om microcredentials efficiënter te kunnen valideren, erkennen en over te dragen. Daarmee zou dit initiatief bijdragen aan de vormgeving van de Europese Onderwijsruimte, door het grenzeloos stimuleren van leven lang ontwikkelen en het verbeteren van vaardigheden van lerenden.

In de reactie worden een Europese aanpak en de door de Europese Commissie gehanteerde definitie verwelkomd en een aantal aandachtspunten en mogelijke acties op EU-niveau voor een gezamenlijke aanpak benoemd. Deze aanpak zou onderwijsinnovaties in de lidstaten op dit gebied niet onnodig moeten belemmeren. Ook zijn voorkeuren aangegeven m.b.t. de inhoud van

¹ Tweede Kamer, 22 112, nr. 2906.

² Tweede Kamer, 22 112, nr. 2965.

³ Tweede Kamer, 22 112, nr. 2998.

microcredentials. In de reactie zijn tevens relevante Nederlandse beleidsontwikkelingen in het mbo en ho beschreven.

Onze referentie
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Naar verwachting zal de Commissie mede op basis van de op deze consultatie ontvangen reacties eind 2021 voorstellen presenteren op deze consultatie. Over dit beleidsinitiatief zal uw Kamer zoals gebruikelijk worden geïnformeerd via een fiche beoordeling nieuwe Commissievoorstellen (BNC-fiche).

De minister van Onderwijs, Cultuur en Wetenschap,

Ingrid van Engelshoven

Position paper by the Netherlands in the context of the public consultation of the European Commission on “Micro-credentials for lifelong learning and employability”¹

1. Introduction

The twin transitions towards a more digital and sustainable economy, strengthened by the recent challenges in the labour market in Europe as a consequence of the Covid-19 crisis, make the necessity of upskilling and reskilling, lifelong learning and informal learning and related public and private investments and policy reforms higher than before. Those changes ask for a more flexible learning program by education institutions catered to a broader and more diverse group of learners. We therefore support a broad, integrative approach at EU level concerning labour market policies and education sectors, policy attention for the ‘twin’ green and digital transitions and for vulnerable groups.

The Dutch government has expressed a clear message on this and communicated this also to our national parliament following last year’s updated EU’s Skills agenda, the Communication and following Resolution on the European Education Area, the Commission’s work programme 2021 and, most recently, the Action plan on the Social Pillar and Social Summit thereafter.

More specifically, the Netherlands welcomes the preparatory work done by experts in a consultation group² and the current broad consultation on micro-credentials³. Their results could be valuable input for concrete proposals which could give more certainty and transparency at EU level concerning the value of smaller units of education and recognition of learning outcomes achieved by learners. A thorough, evidence based preparation is crucial to guarantee that such proposals will have clear added value for Member States, educational institutions and employers. In this position paper from the Netherlands we will express our priorities and address a number of more detailed aspects and concerns, against the background of our national (policy) developments.

2. Relevant national policy developments

Government policies

The **Dutch Higher Education policy** was updated by the Dutch government in 2019 in the Strategic Agenda for Higher Education and Research. Society and the labour market are changing rapidly and it is crucial for higher education to keep up with that pace. Higher education institutions should work on closer alignment with the labour market and society. The aim is that more institutions will provide flexible study courses, respond rapidly and adequately to the needs of various groups of students, including working adults. The number and ratio of working adults in higher education should increase substantially. Digitalisation presents many opportunities to achieve this. In this context, universities of applied sciences and universities will have to create sufficient provisions to accommodate those combining education with a career. Lifelong learning also calls for different forms of learning. Flexible, modular courses lower the threshold for students and promote accessibility.

A new law is under preparation⁴ to create more possibilities for students to design and follow a personalised learning track within an education programme and make use of knowledge and skills acquired earlier. This includes the use of learning outcomes, facilitates the use of those learning outcomes in micro-credentials, and may stimulate the recognition of those micro-credentials. This would be based on a higher transparency of learning objectives and outcomes and thus value for (other) education programmes.

The Ministry of Social Affairs and Employment in cooperation with the Ministry of Education, Culture and Science also stimulate demand for lifelong learning, for example with grants from the newly introduced scheme to improve career prospects (STAP-budget), and an online overview of learning opportunities.

The **Dutch VET policy** as revised during the last government period (2017-2021) and in agreement with the VET-sector prioritizes flexibilization of educational programs for both

¹ [Micro-credentials – broadening learning opportunities for lifelong learning and employability \(europa.eu\)](https://european-council.europa.eu/media/e3000000/1/press/1618224/1618224_en.pdf)

² [european-approach-micro-credentials-higher-education-consultation-group-output-final-report.pdf \(europa.eu\)](https://european-council.europa.eu/media/e3000000/1/press/1618224/1618224_en.pdf)

³ [A European approach to micro-credentials \(europa.eu\)](https://european-council.europa.eu/media/e3000000/1/press/1618224/1618224_en.pdf)

⁴ The preparations are currently in the stage of an internet consultation, see: [Overheid.nl | Consultatie Wet leeruitkomsten hoger onderwijs \(internetconsultatie.nl\)](https://overheid.nl/consultatie/wet-leeruitkomsten-hoger-onderwijs)

jobseekers and employed adults, more possibilities for lifelong learning also in reaction to the twin transitions and better alignment with the regional labour market, amongst others through public-private partnerships. The Dutch qualification structure has been adapted to create more flexibility by developing a basic profile and free choice parts. In addition to VET diplomas, certificates have been introduced for jobseekers and working adults. Further initiatives will be taken by all institutions involved to support upskilling and reskilling and a better cooperation at regional level. In initial VET, only education towards a full diploma can be funded according to current legislation.

Developments in the Dutch higher education sector

Against the background of the Dutch policies and regulations on higher education, an Acceleration Plan towards flexibilisation and digitalisation has been put in place in 2018, in which 39 Dutch higher education institutions work together⁵. The plan is divided in a number (8) of “acceleration zones” including one on flexibilisation of education. In this zone, in 2019 and 2020 work has been done to analyse all issues related to the use of micro-credentials, in cooperation with 18 educational institutions and other Dutch stakeholders (OCW, SURF, NVAO, DUO, VH, VSNU, ISO, LSVb, VNO-NCW, SBB, MBO-Raad, SER, NRT0⁶). There is a large interest to work with micro-credentials within the Dutch HE institutions, but many practical, technical and more fundamental questions are hindering the further implementation. Given the time needed to solve all those issues, priority will be given to lifelong learning by professionals while for students in initial education, micro-credentials could potentially also result in interesting new opportunities.

By now, June 2021, on the basis of interviews with quality officials within HE institutions, 12 quality requirements and conditions have been formulated, which will be based on the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. It should enable HE-institutions to work jointly on an overall framework; to enrich the education programme with new micro-credentials with independent value; to work out procedures for offering, registering and delivering of micro-credentials; to organise and improve the internal quality assurance and to identify and solve problems and limitations in relation to the existing legal framework. The pilot is planned to run from 1 January 2022 until 31 December 2023.

Apart from this national pilot, the Netherlands is well connected to the Erasmus+ Microbol project (*Micro-credentials linked to the Bologna key commitments*)⁷ which supports ministries and stakeholders in exploring, within the Bologna Process, whether and how the existing Bologna tools can be used and/or need to be adapted to be applicable to micro-credentials. The Dutch internationalization support office Nuffic is leader of an Erasmus+ project STACQ which supports institutions in their evaluation of micro-credentials⁸. Some Dutch universities are directly involved in innovations in this area through their role in associations or alliances of European universities.

Developments in the VET sector

In the Dutch VET sector a digitalisation programme to encourage experiments with ‘edubadges’ exists⁹. Concerning flexibilisation of education, steps have been taken especially towards adult learners, in the form of a certificate or a declaration of practical experience which can receive funding either by regional authorities, the Dutch public employment service UWV or employers in the context of upskilling or reskilling.

3. Dutch position on a working definition of micro-credentials

The European Commission’s working definition of micro-credentials is as follows:

“ A micro-credential is a proof of the learning outcomes that a learner has acquired following a short learning experience. These learning outcomes have been assessed against transparent standards. The proof is contained in a certified document that lists the name of the holder, the achieved learning outcomes, the assessment method, the awarding body and, where applicable, the qualifications framework level and the credits gained. Micro-credentials are owned by the learner, can be shared, are portable and may be combined

⁵ [Versnellingsplan Onderwijsinnovatie met ICT](#)

⁶ See list of those Dutch organisations and their missions in Annex.

⁷ [MicroHE – Supporting Learning Excellence through Micro-Credentials in Higher Education \(microcredentials.eu\)](#)

⁸ [STACQ \(2020-2022\) | Nuffic](#)

⁹ [Stimuleringsregeling-Edubadges.pdf \(sambo-ict.nl\)](#)

into larger credentials or qualifications. They are underpinned by quality assurance following agreed standards.”

We welcome the initiative by the Commission to formulate a definition that is easy to understand and is applicable to any sector and provider. For the Netherlands, this definition is very workable, noting however that some issues still have to be solved at national and European level, e.g. the relation with accredited and non-accredited education; credit and non-credit recognition; the minimum size of a micro-credential, etc. Micro-credentials should be focused on learning outcomes (output) and should be aligned with education which should also be described in terms of learning outcomes and achieved skills. Ideally, such descriptions should be also well connected to skills based matching in the labour market. We are looking forward to the analysis of the replies on the consultation about potentially other important aspects of high quality micro-credentials.

4. What EU-level actions and measures would facilitate the take-up of micro-credentials?

For the Netherlands, subsidiarity and autonomy of both VET and higher education institutions are important principles to respect at EU level. Universities are academically independent and in control of their own quality assurance. The Dutch pilot project on micro-credentials will be built bottom-up without a steering role of the Dutch government. Developments are still in a very early stage and these should not be disturbed in a too early stage by too prescriptive rules at EU level.

Having said this, we see the following priorities to be addressed at EU level:

1. **Working definition** of micro-credentials (see before) as a basis for promoting national developments and communication purposes (see also point 2 and 3).
2. **Commitment from policy makers and leaders of education institutions** is needed to support any major educational innovations. The recent policy debate at ministerial level in the EYCS council (17 May 2021) addressing apart from the university alliances and the higher education transformation agenda also micro-credentials, was valuable. Further discussions should be considered in the future again, at political level as well as in high level platforms such as informal DG-group meetings; working groups for VET and HE under the governance arrangement for the European Education Area¹⁰ and the ACVT for the VET sector.
3. The EU could support **wider communication to the European society** (students, employers, trade unions, general public, other stakeholders) to identify, understand and help shape perceptions of the value, credibility, recognition and currency of micro-credentials. The ultimate objective would be that micro-credentials can be used in all Member States. The Commission itself could promote the use of micro-credentials in relevant European programmes such as Erasmus+ and ESF and related instruments such as *Europass* and the *European Student Card initiative*.
4. **Transparency of the level of micro-credentials.** Micro-credentials should also be seen in connection with the *European Qualification Framework (EQF)*. We do not believe that a micro-credential can replace a full qualification within the EQF. It can complement the curriculum or can be valued in its own right, but in both cases a correct classification in the EQF is crucial. This means EQF may need to be extended or improved to be futureproof in relation to a very likely increasing use of micro-credentials and there would be a role for the Commission to update the current arrangements in place. More importantly, within the Member States, a lot of work still needs to be done to link national qualifications, reached in formal and non-formal education, to the EQF levels. Also in the Netherlands, legislative proposals are under preparation in this area. Our national pilot will guarantee the level of learning outcomes

¹⁰ See Council Resolution on a strategic framework for European cooperation in education and training towards the European Education Area and beyond (2021-2030); https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=uriserv:OJ.C_.2021.066.01.0001.01.ENG

as realized, based on the accreditation of the study, and not the learning outcomes as aimed for (like is the case in EQF).

5. **European quality assurance guidelines** for micro-credentials are needed to define standards and to support institutional best practices for quality assurance. As suggested in the report of the consultation group, the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* could be a useful basis. In the VET sector, more discussion is needed in this area, which could take place in the context of the implementation of the recent Council Recommendation and Osnabrück Declaration.
6. **Credits and learning outcomes.** Micro-credentials need to adhere to an agreed credit value based on the *European Credit Transfer and Accumulation System (ECTS)* when intended to be credit-bearing. This requires that the educational component is firmly anchored in the entire validation and recognition process. Education institutions must determine what the learning module entails exactly (in terms of the learning content and its place in the overall curriculum) and how the learning outcomes should be weighed in terms of ECTS (and which accumulation of credentials is necessary for a qualification). Working with ECTS will contribute to transferability and recognition of micro-credentials. However, the formal workload component of ECTS may provide a challenge to the focus on achieved learning outcomes, especially in the context of lifelong learning. Alternative means of expressing the value of achieved skills are worth exploring.
7. **Level playing field in acknowledgment and recognition.** We would like to emphasize that a European approach for micro-credentials should not only cater to publicly funded education, but also to private education and training institutions, as a crucial sector of providers of lifelong learning. For the same reason, it should not only cater to formal education, but also to non-formal education.
8. **Digitalisation, authentication and recognition challenges** need to be addressed. While theoretically it would be possible to continue issuing micro-credentials on paper, for the Netherlands this would not be necessary per se given the many advantages from a digital format for issuing, speed of recognition and exchange and storage. We agree however with the recommendations of the Consultation Group that privacy and security are crucial, and all options to realise these important objectives should be explored at both national and EU level. A *conditio sine qua non* is that learners will have good digital skills to handle and store their qualifications in digital format. The EU could play a positive role by its forthcoming Council Recommendation on micro-credentials in convincing all Member States to put mechanisms in place for cross-border recognition. Promoting Member States to compile lists of official and reliable providers of micro-credentials could also be an option, which is probably necessary nationally for other purposes as well. Micro-credentials can play a useful and stimulating role in international mobility of learners. The link with the *Lisbon Recognition Convention*¹¹ and other global recognition instruments should be ensured, and also with existing and future global standards for a safe exchange of student data.
9. **Suitable open technical platforms and systems** are needed for a sustainable system of micro-credentials and to help manage new credit and recognition models. While this is primarily a national responsibility, the EU could support the setting up of such platforms and systems, the exchange of best practices and developing technical standards. Learners should be able to bring their micro-credentials together at a suitable place, for example as *Europass Digital Credential* and share their micro-credentials in this way with whoever they want. The Europass Digital Credentials Infrastructure (EDCI) will give education institutions and other providers the ability to securely produce and issue credentials. In the Netherlands, the experience and

¹¹ [Lisbon Recognition Convention \(coe.int\)](https://www.coe.int/en/lisbon)

infrastructure of Surf (Edubadges) will be used during the pilot in higher education mentioned above.

5. Dutch position on EU standard elements to characterise micro-credentials under a European approach

In answering this question of the consultation, The Netherlands wants to emphasize that the awarding bodies of micro-credentials should be only the national education and training organisations as acknowledged **by the Member States**. Micro-credentials should at least contain a small number of obligatory, essential standard elements:

	Essential	Recommended	Optional	Not relevant
*Identification of the holder of the micro-credential	☒	☐	☐	☐
*Title of the micro-credential	☒	☐	☐	☐
*Country/Region of the issuer	☒	☐	☐	☐
*Awarding body	☒	☐	☐	☐
*Date of issuing	☒	☐	☐	☐
*Notional workload needed to achieve the learning outcomes (expressed in ECTS, wherever possible, or duration/hours)	☐	☒	☐	☐
*Level (and cycle, if applicable) of the learning experience leading to the micro-credential (EQF, QF-EHEA)	☒	☐	☐	☐
*Learning outcomes	☒	☐	☐	☐
*Form of participation in the learning activity (online, onsite, blended)	☐	☐	☒	☐
*Type of assessment	☐	☐	☒	☐
*Quality assurance of the credential	☒	☐	☐	☐
*Quality assurance of the learning content (not applicable to validation)	☒	☐	☐	☐
*Grade achieved	☐	☒	☐	☐
*Integration and stackability options	☐	☒	☐	☐

	Essential	Recommended	Optional	Not relevant
*Supervision and identity verification during assessment				

6. Conclusion: opportunities and challenges of a European approach to micro-credentials

The Netherlands welcomes the timely initiative by the Commission to work towards a European approach to micro-credentials, with a common definition and elements for a standard format as important building blocks.

Such an initiative, taking the form of a proposal for a Council Recommendation, could contribute to our national policy developments towards the education and labour market, and to transparency and portability of micro-credentials within and between countries, education sectors and employers within the labour market.

The proposed European approach should at the same time not disturb national developments, which are still at an early stage in all EU Member States including the Netherlands, but encourage and support national innovative approaches and help disseminating best practices in this area.

For the Netherlands, micro-credentials are no alternative to full-degree programmes in initial education, but an increased use can give interesting new possibilities for all learners, initial and post-initial. In this respect, we would like to emphasize that a European approach for micro-credentials should not only cater to publicly funded education, but also to private education and training institutions, as a crucial sector of providers of lifelong learning. For the same reason, it should not only cater to formal education, but also to non-formal education. A level playing field in terms of acknowledgment and recognition should be guaranteed.

A two-year pilot to start in Dutch higher education in 2022 will help identify advantages and obstacles. We are willing to share our national experiences within the EU in due time. It is already clear however, that in order to be workable for institutions and to have sufficient value in the labour market, micro-credentials should have a sufficient minimum size. In the Netherlands, our working basis is currently a minimum of 3 and a maximum of 30 ECTS. Working with ECTS will contribute to transferability and recognition of micro-credentials. The formal workload component of ECTS may however provide a challenge to the focus on achieved learning outcomes, especially in the context of lifelong learning. Alternative means of expressing the value of achieved skills are worth exploring.

The use of micro-credentials could contribute to smooth transitions and permeability between VET and higher education and to better conditions for continued education tracks between both sectors, nationally and internationally. It is however clear that the development of the concept of micro-credentials and the related policy adaptations are more advanced in higher education institutions than in VET institutions, and micro-credentials may also have different potential in both sectors. In the envisaged Council Recommendation on a European approach this different starting position should sufficiently be taken into account.

Annex: list of relevant Dutch stakeholder organisations interviewed for the pilot micro-credentials in Dutch higher education

- **VSNU, Vereniging Samenwerkende Nederlandse Universiteiten** (Association of Dutch universities): www.vsnunl.nl
- **VH, Vereniging van Hogescholen** (Association of Dutch universities of applied science): www.vhnl.nl
- **SURF**, cooperative association of more than 100 Dutch educational and research institutions established to fully utilise the opportunities of digitalisation: www.surf.nl
- **NVAO, Nederlands-Vlaamse Accreditatie organisatie** (Accreditation Organisation of the Netherlands and Flanders), quality assurance agency that safeguards the quality of higher education in the Netherlands and Flanders: www.nvaonl.nl
- **DUO, Dienst Uitvoering Onderwijs** (Executive Agency Education), two of the many tasks of this agency concern the register of Dutch diplomas and recognition of foreign diplomas: www.duonl.nl
- **LSVb, Landelijke Studenten Vakbond** (Dutch Student Union): [LandelijkeStudentenvakbond \(LSVb\) \(dutchstudentunion.nl\)](http://LandelijkeStudentenvakbond(LSVb)(dutchstudentunion.nl))
- **SBB, Samenwerkingsorganisatie Beroepsonderwijs Bedrijfsleven** (Foundation for Cooperation on Vocational Education, Training and Labour Market). Within SBB, vocational education and training (VET) and the labour market cooperate at national, sectoral and regional level: www.s-bbnl.nl
- **MBO Raad** (Association of Dutch VET colleges): www.mboraadnl.nl
- **NRTO, Nederlandse Raad voor Training en Opleiding** (Dutch Council for Training and Education), Association of Dutch private training providers: www.nrtonl.nl
- **SER, Sociaal-Economische Raad** (Social and Economic Council of the Netherlands), advisory body in which employers, employees and independent experts work together to reach agreement on key social and economic issues such as lifelong learning: www.ser.nl
- **VNO-NCW**, Association of Dutch employers, branch organisations and companies: www.vno-ncwnl.nl