

# Poland

## Małopolska

Regional Report on Lifelong  
Learning Policy 2023

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Małopolska (Poland) – Regional Report on Lifelong Learning Policy 2023

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## Introduction

The document prepared in the framework of the COMORELP project (Joint Monitoring of Regional Lifelong Learning Policies) summarises the evaluation of regional lifelong learning policies in the Małopolska region. The evaluation was based on a tool prepared by representatives of the project's partner institutions, representing Poland, Italy, the United Kingdom, France, Belgium, and Turkey. The tool includes an evaluation of different aspects of lifelong learning policy in the region – Its management, design and implementation, and evaluation. The carried out self-assessment, however, is not intended as an accountability check, but as a tool for building the region's self-knowledge, strengthening learning processes and sharing experiences.



**Picture 1.** Participants of the LLL workshops held in Kraków (Poland)

The participants in the self-assessment roundtable were representing all economic sectors, public, private, and non-governmental as the stakeholders of lifelong learning processes in Małopolska.

The answers given to the questions were jointly discussed and collectively agreed upon. The participants of the Regional Round Table, in concluding their deliberations, unanimously acknowledged that the very attempt to answer the questions posed was a learning experience. It made it possible to look at individual problems or issues of lifelong learning from a new perspective, often going beyond seeing them only from the level of the institution or organisation they represent.

The report consists of several parts: it first presents a general characteristic of the region, particularly focusing on its potential for the development of lifelong learning, then presents the results of the SWOT analysis, which characterises this potential, followed by the general structure of the organisation of lifelong learning in Poland. The last and most comprehensive part of the study contains the results of a self-assessment of the learning policy in Małopolska in relation to the fourteen aspects of the policy analysed. The report is supplemented by an annex, which presents the synthetic results of the evaluation.

## Małopolska Region

In terms of area (12th in the country, 15,200 km<sup>2</sup>), Małopolska is one of the smallest regions in Poland. At the same time, it is one of the largest in terms of population (4th in the country, 3.4 million people). It thus ranks second, after the Silesia Voivodeship, as the region with the highest population density (224 per km<sup>2</sup>). It is located in the south-eastern part of Poland, neighbouring the Silesian Voivodeship to the west, the Świętokrzyskie Voivodeship to the north and the Podkarpackie Voivodeship to the east. The southern neighbour of the region is the Slovak Republic. The region's capital city is Krakow, the second most populous city in Poland (771,000 inhabitants) – an important scientific, cultural, and economic centre.



**Figure 1.** Regions of Poland and the Małopolska region

In Małopolska, the awareness of emphasising issues related to the development of adult learning in regional policy has a long-standing tradition. After 2004, both in Europe and in Poland, the need to support adult learning in the context of the needs of the labour market and the socio-economic development of the country was recognised. Such were the objectives of the then Strategy and the "Education and Training 2010" Programme.

The proof of the priority given to lifelong learning by the region is the initiation of cooperation between institutions active in this area. As a result, in 2008 a group of institutions – 55 initiators, with the full support of regional authorities established the Małopolska Lifelong Learning Partnership, meeting the challenges of the times of the "knowledge economy". This unique nationwide initiative has enabled institutions active in the field of adult learning to get to know each other and to work together to promote an attitude among the region's residents that is open to learning. At the same time, it has created better conditions for the comprehensive development and provision of competent employees for the competitive and innovative economy of Małopolska.

Nowadays, the Partnership has more than 100 members, and its tasks and objectives are still valid. Ongoing technological changes, as well as events triggered by the pandemic, present Małopolska, and thus the Partnership, with completely new challenges. There are selected challenges in the Regional Development Strategy "Małopolska 2030":

### Education

- Improvement of the quality of education at all stages of education and better preparation of graduates for the needs of the labour market and the changes within it towards Industry 4.0, through: development of branch schools educating in the so-called professions of the future, better cooperation of schools with the employer community, strengthening of the system of improving teachers' qualifications and development of educational and professional counselling.
- Departure from treating education as a closed stage of preparation for life and work – popularisation of lifelong learning attitude, development of the offer of lifelong learning and increase of participation of adults in education.

### Labour Market

- Vocational activation of human capital reserves among the economically inactive and long-term unemployed.
- Supporting working people in the changes taking place in the labour market.
- The support for employers in the development, implementation, and development of modern forms of employee management (e.g., knowledge management, age management, health prevention, forms of reconciliation of professional and private life).

The Małopolska Voivodeship is perceived as a leader in creating solutions for adult learning on the national and international arena. This is confirmed by its being invited to cooperate in planning systemic solutions and policies in the field of adult learning.



## Małopolska LLL Structure

The institutions and public bodies involved in the process of organising and managing, including financing, lifelong learning policy are at national as well as regional and local level.

### National Level

The **Ministry of Education and Science** (MEiN) which:

- is responsible for the implementation of state policy in the field of education and science as well as higher education; and carry out tasks related to the preparation of strategic solutions, development and financing: kindergartens, primary, secondary, special and post-secondary schools, Polish schools abroad, universities, research institutes, scientific institutes;
- develops and implements educational and scientific programmes adapted to the challenges of the modern world and changing realities. The aim of MEiN's activities is to build a modern school, develop the competences of the future and ensure that all students have equal access to quality education;
- nurture the innovative development of Polish science and its active cooperation with the economy;
- support researchers in their pursuit of scientific excellence, in the development of their careers and in conducting cutting-edge research.

The **Ministry of Family and Social Policy** (MRiPS) whose mission is to lay the foundations for improving the quality of life in family, labour, and social security matters. In the area of the labour market, the main tasks include:

- shaping of labour market policies,
- developing programmes to combat unemployment and
- coordinating public employment services.

Tasks covering employment promotion, mitigating the effects of unemployment and professional activation are carried out by district and voivodeship labour offices, which are subordinate to starosts and voivodeship marshals, and their activities are coordinated by the Minister. The Ministry supervises the work related to the budget of the Labour Fund and the Guaranteed Employee Benefits Fund. In doing so, it cooperates with the relevant departments and institutions regarding the use of funds from both funds.



One of the sources of funding for the costs of vocational and continuing education is the Labour Fund, which is a state purpose fund at the disposal of the minister responsible for the labour sector. The resources of the Labour Fund are used on the basis of an annual financial plan of the Labour Fund. The plan is an annex to the Budget Act and contains projected revenues and expenditures that can be realised each year. Annual limits for the use of Labour Fund resources for tasks implemented by districts from resources allocated to a given voivodeship are established by the minister competent for labour sector. Regional boards distribute the allocated funds based on criteria established by the regional assemblies, and the relevant head of districts selects forms of activation of the unemployed and other eligible persons within the available limit of funds in the form of a decision based on the Act. This takes place after consulting the district labour market council. This is done based on the provisions of the Act of 20 April 2004 on employment promotion and labour market institutions (Journal of Laws of 2022, item 690, as amended).

The **Ministry of Funds and Regional Policy**, which is responsible, inter alia, for managing the implementation system of the European Funds, including, inter alia, regional development including programming and coordination of development policy and management of the system of the European Funds.

## Regional and Local Level

Universities and local government consisting of municipal, district and regional government (it is worth emphasising that in the region, in addition to the local government, there are also bodies that are an extension of the central government – In the form of the voivode, who is the government's representative in the region). The tasks of local government units are both own tasks defined by law and tasks commissioned by the public administration. In the area of education and lifelong learning in the broadest sense, according to the law, the tasks of the:

- **municipalities** include, among others: matters concerning public education (kindergartens and primary schools), culture (libraries, heritage sites), sport and tourism (playing fields and other recreational areas and sports facilities), or social welfare and family support;
- **districts** include tasks of supragmina nature, i.e., those which the municipalities are unable to perform on their own. These include, inter alia, matters concerning education (secondary, special and sports schools), support for the family and pro-family policy (e.g., nursing homes, care, and educational facilities), support for the disabled, counteracting unemployment and activating the local labour market (whereby the district labour offices are a part of a task delegated to the government administration)

→ **regions** are the public tasks of regional character which are not reserved by the law to the bodies of central government administration. As in the case of municipalities and districts, detailed tasks are defined by law. These include, among others, in the field of education the establishment of specialised secondary schools and higher education. The task of the regional government is also to take care of the development of the region as a whole.

Looking at both national and regional structures, one can see clear parallel structures within which formal education and labour market processes are managed. Such an organised process seems to stand in opposition to the nature of lifelong learning, in which formal, non-formal and informal education, school-age and adult, professional and personal development intermingle.

In addition, it is worth emphasising that the main sources of the indicated processes find funding at central level, leaving the regions with only EU funds, or dedicated to precisely defined tasks, the Labour Fund, including the National Training Fund.

## LLL SWOT Analysis

Strengths	Weaknesses	Opportunities	Threads
<p>The experiences in the introduction and implementation of innovative solutions (entity-based financing, Career Assessment, MSUES).</p> <p>The experience in cooperation with international partners, sharing of knowledge and experience.</p> <p>Cooperation between institutions and organisations involved in the field of Lifelong Learning</p> <p>Many educational and training institutions with diverse capacities and capabilities</p>	<p>Lack of lifelong learning policy: siloed system versus comprehensive LLL process.</p> <p>Low priority for adult learning in regional policies, including education policy (at various levels).</p> <p>Insufficient involvement of decision-makers in LLL policymaking.</p> <p>Funding for LLL based on EU funding but not enough on national funding.</p> <p>Project-based activities, consequently, lack of their continuity.</p> <p>Lack of evaluation and systematic</p>	<p>The innovativeness of Małopolska – the development of the region, technological changes requiring the improvement of personnel - creating demand for new qualifications and competencies.</p> <p>Recognition and capability of Małopolska as a region open to LLL (good brand).</p> <p>The next EU financial perspective, resources for the continuation of activities.</p> <p>Demographic factors: ageing population, migration-related changes, war refugees.</p>	<p>Fragmentation of decision-making centres, intersecting competences of different authorities.</p> <p>Centralisation of the management and funding of LLL policy.</p> <p>Instability of the geopolitical situation.</p> <p>The possibility of losing the mutual trust of cooperating partners and institutions due to the polarisation of public views and the risk of the politicisation.</p> <p>Economic downturn, shrinking budgets for development activities in the public, non-</p>

Strengths	Weaknesses	Opportunities	Threads
<p>Adaptability, flexibility of institutions working in the field of adult learning.</p> <p>Broad educational offer, ability to reach different groups of the population.</p> <p>High educational potential: Krakow as a strong academic centre, also with good secondary schools.</p> <p>Human capital (educators and learning workforce).</p> <p>Educational ambitions of all groups of residents.</p>	<p>implementation of best practices.</p> <p>Low flexibility of education providers (schools, universities), poor responsiveness to learners' needs.</p> <p>The dominance of formal education, too little importance of non-formal and informal education (among different actors).</p> <p>Poor cooperation of the education system with business, especially insufficient, but necessary in vocational schools.</p> <p>Inadequate school counselling.</p> <p>Insufficient interest in vocational education, low prestige of vocational education.</p> <p>Staff shortages in vocational education, staff deficits in formal education, ageing workforce.</p> <p>The mismatch between the education model and the challenges of a changing society, market, and technology (key competences, relational education versus transmissive education).</p> <p>Insufficient establishment of attitudes, motivation for lifelong learning and responsibility for own development.</p>	<p>Post-pandemic, dissemination, and improved access to adult learning in remote formats.</p> <p>Acceleration in the labour market related to the development of technology, artificial intelligence, and easier access to new solutions.</p> <p>Public participation, stakeholder involvement in activities related to development of LLL.</p>	<p>governmental and private sectors.</p> <p>Increasing burden of maintenance costs of educational and development facilities on local government units.</p> <p>Dominance of micro companies which find it more difficult to invest in staff competence development, lack of impulses for competence development.</p> <p>Poor age and competence management in companies, insufficient solution in diversity management approaches.</p> <p>Abandonment of development activities due to the impoverishment of society.</p>

**Table 1.** SWOT Analysis of the Małopolska Region

# Results of Regional Assessment

## Area 1. Designing Policy / Strategy Level

### Dimension I. The Placing of LLL in a Regional Development Strategy

Question	Answer
1. Is lifelong learning an important focus of the regional development plan or of the regional strategy?	Yes

**Table 2.** Question 1

To determine the place of lifelong learning in the region's strategy, the participants of the Regional Round Table (RRT) were asked **whether lifelong learning is an important element of the regional development plan or strategy in Małopolska?** The answer was positive. It is justified by the specific provisions of the region's strategic documents. The key document is [Małopolska Regional Development Strategy "Małopolska 2030"](#) (SRWM) that was adopted on 17.12.2020. In particular, two main directions of action are worthy of attention, which, under the main development direction Education (6), focus on:

- the dissemination of high quality educational and vocational guidance at every stage of life, (6.7.3)
- the promotion of lifelong learning and the development of lifelong education, including towards the validation of professional competences within the framework of the Integrated Qualification System (ZSK), (6.7.4).

Additionally, it has been planned to implement a strategic undertaking which is a continuation of the projects carried out by the Regional Labour Office in Kraków (WUP in Kraków) [Małopolska Career Instinct](#). It is also worth noting that lifelong and adult learning is one of the priorities that the Region is seeking to secure funding for in the Regional Operational Programme 2021-2027 that is being developed.

Experts noted that the complexity of the topic vs. a very clear, 0-1 answer could be problematic suggesting the introduction of a scale, at least of 5 steps. They also emphasised the rather high generality of provisions in strategic documents and the variable knowledge

of such documents among different stakeholder groups. This may cause the assessment of this aspect of LLL policy in the region to differ among stakeholders representing different market sectors, e.g., public vs. private.

### Conclusions

- Lifelong learning is an important element of the Region's policy.
- The provisions of the strategic documents of the Region, including the development strategy itself, confirm the relevance of LLL for the development of the voivodeship.
- An assessment of the actual relevance of LLL in the Region should be made by different groups of stakeholders in the LLL process, as their perspectives may differ.
- There is a need to disseminate the objectives and activities of the Region in the field of LLL among the stakeholders of lifelong learning in a manner adapted to the needs of different groups.

## Dimension II. Promoting and Implementing Democratic Governance within the Regional LLL System

Question	Answer
2. Are stakeholders, learners and educators involved in the governance system of LLL (or specific education sectors)	No

**Table 3.** Question 2

The experts agreed that stakeholders, learners, and teachers are not involved in the lifelong learning management system (or in specific education sectors).

The answer to the question was preceded by a discussion ending with a suggestion of the need to identify the most important stakeholder groups. The experts stressed that the answer may differ for different groups. At the same time, representatives of different sectors cited good practices implemented by their institutions or within their sector to confirm their answer. It is worth pointing out, for example, the good practice cited by the representative of a cultural institution [Very Young Culture](#). This programme for the development of cultural education, designed for teachers and cultural animators as well as children and young people, has in its core the subjective treatment of children and involving them in the process of deciding what the project in which they will participate will look like.

The [Małopolska Lifelong Learning Partnership](#) was also mentioned as an informal organisation that consults on solutions supporting the development of LLL. The activity of the WUP in Kraków as an institution coordinating activities in the field of adult learning was

noted. At the same time, there was a suggestion to intensify the activities of the Department of Education of the Marshal's Office in lifelong learning.

The presence of various mechanisms supporting lifelong learning at national level was highlighted, such as the National Qualifications Framework created by a national institution (IBE), noting that it is created top-down rather than bottom-up, which may be the reason for its limited functionality. At the same time, it was emphasised that the initiatives cited are largely, if not all, EU funded.

### Conclusions

- Not all stakeholder groups are included in the LLL management process.
- Participatory practices are implemented e.g., by cultural institutions as part of the Very Young Culture project.
- The level of awareness and need for stakeholder involvement in LLL policymaking varies.
- A good example of involving stakeholders in LLL activities is the activity of the WUP in Krakow and MPKU.

## Dimension III. Inter-Institutional Coordination and Integration of LLL Policies

Question	Answer
3. Does a lifelong learning policy exist at regional level?	No
4 a. Does a lifelong learning policy cover a formal education sector?	No
4 b. Does a lifelong learning policy cover an informal education sector?	No
4 c. Does a lifelong learning policy cover an all age-groups education sector?	No
5 a. Is there financial cooperation and coordination between central and regional levels?	No
5 b. Is there administrative cooperation and coordination between central and regional levels?	No
5 c. Is there any other cooperation and coordination between central and regional levels?	No

**Table 4.** Questions 3-5

It was agreed that there is no lifelong learning policy at regional level covering all education sectors. When responding to the question on the coordination and integration of lifelong learning policies, participants raised several important issues as barriers to these activities. Attention was drawn to the existing legal framework, which explicitly links formal education policy to the national level, limiting the region's actions to support activities only. In addition, it was emphasised that the detail of legislative documents at the national level (laws, regulations) and often related sources of funding (subsidy) effectively limit, even block, regional initiatives in this area. Political risks were also pointed out, which at the local government level can be a serious barrier to substantive inter-institutional cooperation.

One of the key documents at central level defining the tenets of formal education as well as lifelong learning is the [Integrated Skills Strategy](#), which defines the areas of impact:

- Basic, transversal, and vocational skills of children, young people, and adults
- Developing skills in formal education - management staff
- Developing skills in formal education - teaching staff
- Developing skills outside formal education
- Developing and using skills in the workplace
- Career guidance
- Employer collaboration with formal and non-formal education
- Lifelong learning planning and skills validation.

It has been noted that the current legal solutions result, among other things, in a kind of soiling of these naturally interpenetrating areas, such as education, culture and the labour market. Emerging bottom-up initiatives of informal intersectoral cooperation do not have a chance to continue, as they lack definition in systemic solutions. The situation regarding support to local governments in building key competences was also mentioned, in particular lifelong learning competence of children and young people in formal education, which was mentioned during the discussion. The discussion ended with the conclusion that there are such measures in the region, but they finance individual projects and not systemic solutions.

The [National Recovery Plan](#) (KPO) initiative was also cited as an example of an innovation to initiate and test inter-institutional cooperation in lifelong learning. The KPO project, funded by EU funds at central level, is designed to put in place regional coordination teams (WZK, Regional Coordination Teams) for activities in LLL. However, there is substantive cooperation with national authorities – regions develop solutions that, when transferred to the national level, are likely to be taken into account in the development of systemic solutions, e.g. the subjective system of financing training or the quality standard ([Małopolska Standards of Education and Training Services](#)).

## Conclusions



- The current legal framework does not allow enough room for regional lifelong learning policies; both policies and tools in this area are defined centrally, which limits the region's scope for action.
- Political factors can be a major barrier to substantive inter-institutional cooperation at regional level.
- Support for building lifelong learning competences has the dimension of individual projects rather than systemic measures.

## Dimension IV. Identifying Learner Needs and Monitoring Participation

Question	Answer
6. Does the region monitor the participation rates in LLL? Does the region monitor emerging learning needs?	Yes
7. How frequently does monitoring occur?	Yearly
8. Are there tools and incentives to identify and communicate learning needs?	Yes
9. Are organizations provided with tools and incentives to identify learning needs?	Yes

**Table 5.** Questions 6-9

During the discussion, it was noted that the Region monitors the needs of specific groups and individuals as needs arise. This was the case during the recent events related to the war in Ukraine and the large influx of people there into the Małopolska area. Analogous needs emerged during the pandemic. However, in the end it was felt that these were rather ad hoc measures, however effective, not systemic. A study of the needs of adults using development vouchers was assessed similarly. Reference was made to a project implemented by the WUP in Kraków as part of the Regional Operational Programme (ROP), financed from the ESF - Kierunek Kariera, in which financial support for raising competencies is preceded by a career audit. During meetings with project participants, career counsellors support them in summarising their professional experience to date, defining their competences, and ultimately determining the direction of their further development which is a result of individual predispositions and experience as well as the needs of the regional labour market. It was noted, however, that despite the impressive number of conducted balance sheets (over 40 thousand), this is still an activity addressed to a selected group of project participants and not a systemic solution.

A valuable source of information on participation in LLL and monitoring of educational needs is the project Bilans Kapitału Ludzkiego (Human Capital Balance) carried out since 2009 by the Polish Agency for Enterprise Development and the Jagiellonian University. The project collects and publishes data on, inter alia, educational activity of Polish women and men, the offer of the training market and competences needed in the labour market. The project is carried out at the national level, but data from the regional level is also made available. The long-term nature of the project and the regular updating of research results make it possible to monitor changes over time.

The expert discussion had a positive outcome on the question of whether the region has the tools to identify educational needs and support them, but support measures are overwhelmingly dependent on EU funds. Moreover, they are a kind of sub-system operating within a specific niche, sector, or sub-sector. However, there is no solution at the regional level to connect them and see each other.

It was emphasised that individual employers or universities have tools to identify training needs, but again, these activities are individual in nature and thus are neither universal nor based on systemic solutions.

It is worth mentioning that the only mechanism whereby employers can finance the "clarification of training needs that can be met" operates at national level and is financed from the centrally managed Labour Fund, and this is the [National Training Fund](#) (KFS).

## Conclusions

- Actions carried out in the area of identification and support for meeting financial needs are of a selective nature implemented on the basis of resources of individual organisations (e.g., employers and corporate know-how), or within the framework of EU projects, but there are no systemic solutions at the level of the region.
- The region has at its disposal tools to identify educational needs among citizens developed mainly through projects, e.g., balance of competencies.
- The region is a leader in the implementation of support for individuals based on career balances.
- The main source of funding for development services is the ESF.

## Dimension V. International Comparisons, Cooperation, and Learning

Question	Answer
10. Is the Region a member of an overarching association or network specifically focused on LLL or more specific education sectors?	Yes / No
11. Are exchange learning opportunities in place?	Yes

**Table 6.** Questions 10-11

As part of the discussion, it was highlighted that there is a clearly defined formal path, the passage of which requires the region to become a member of an international organisation. Such action requires approval at the level of the Regional Assembly.

At the same time, individual institutions of the region can participate in international networks, and formal approval for such activity is required at a lower level, i.e., at the level of the Executive Board of the Regional Assembly.

It was agreed that while the Region is not currently a member of an international association or network focused on LLL, its units already belong to such, e.g., Małopolski Instytut Kultury. It should also be added that Małopolska has been an active member of FREREF for many years, has cooperated with LLL P in the LLL HUB project, and therefore has extensive experience in international cooperation in lifelong learning. This cooperation has resulted in numerous projects implemented in international partnerships.

The possibility of making the question of participation in international bodies of individual institutions more specific was raised, which would make it possible to create a kind of map of the activity of Małopolska organisations on the international arena.

### Conclusions

- Małopolska is not currently a member of an international association or network focused on LLL but has many years of experience in international cooperation and carries out projects with partners from other countries.
- There is a lack of a synthetic map of the Region's international activities.

## Dimension VI. Managing and Sustaining Partnerships

Question	Answer
12. Has the regional authority promoted, supported, and achieved sustainable partnerships for lifelong learning?	Yes
13 a. Are there multi-stakeholder partnerships?	Yes
13 b. Are multi-stakeholder partnerships supported by regional authority?	Yes
13 c. Are multi-stakeholder partnerships promoted?	Yes
14. Are there multi-stakeholder partnerships?	Yes

**Table 7.** Questions 12-14

The Małopolska Lifelong Learning Partnership (MPKU) has been operating in our region since 2008 and its work has been coordinated from the beginning by the Regional Labour Office in Kraków. The Partnership brings together public and private institutions, including schools, practical training centres, lifelong learning centres, universities, training companies, employers' associations, foundations, associations, libraries, cultural centres, psychological and pedagogical counselling centres, and district labour offices. The establishment of the Partnership was a strategic decision.

The MPKU continues to enable the collaboration of a wide range of stakeholders in the field of adult learning. The starting point for its activities was the diagnosis of the situation and the identification of needs, which are reviewed and redefined every year. The structure of the MPKU enables all Partners to "see" each other and set the direction of important activities for the Region in the field of adult learning.

The main form of the Partnership's work is working meetings, e.g., thematic workshops, during which solutions are worked out, and topics from the Partnership's annual work plan are explored.

The products developed in the MPKU partnership, in addition to events such as the Małopolska Day of Learning, the Małopolska Festival of Professions, or the Educational Municipality of Małopolska, is the quality label Małopolska Standards of Educational and Training Services (MSUES), awarded by the Małopolska Voivodeship – Regional Labour Office in Kraków in the Centre for Quality Assurance in Education (CZJK).

The MSUES quality label supports the quality of training and counselling not only in the Małopolska Region, but in the whole of Poland. MSUES 2.0 is a certificate recognised by the Polish Agency for Enterprise Development, which can be applied for by companies offering high quality training services in our Region. Holding this quality mark allows training and consulting companies to register in the Development Services Database (BUR). The system was created thanks to cooperation between researchers and practitioners - both training companies and employers - as part of the implementation of one of the recommendations for the creation of a regional adult learning policy. The quality label created in Małopolska was also recognised by the European Commission, which recommended implementing an analogous solution throughout Poland. At the same time, the project under which THE system was developed was recognised by the European Commission in the RegioStars 2017 competition and the Ministry of Development in the European Enterprise Promotion Awards 2017 competition.

### Conclusions

- Małopolska has been supporting and promoting partnerships between LLL stakeholders for many years.
- Since 2008 MPKU exists and has been active as well as MPM since 2014.
- Małopolska is the initiator of the creation of mechanisms for cooperation and coordination in the field of LLL in the regions (implementation throughout Poland as part of the MEiN project).

## Area 2. Implementation

### Dimension VII. Information and Guidance

Question	Answer
15. Is the information easily accessible to all, i.e., if stakeholders' specific needs taken into account?	Yes

**Table 8.** Question 15

The stakeholder group unanimously agreed that information about learning opportunities is easily accessible to all. However, it was emphasised that widely available does not mean widely used.

There were also voices outlining the history of career counselling for adults, which was originally dedicated only to unemployed people registered at District Labour Offices. The lack of widespread knowledge of the existence of career counselling services, familiarity with

the system and, most importantly, the significant limits to its capacity when the solution and services become widespread were highlighted.

### Conclusions

Information about learning opportunities is available to all. Opportunities to develop adult guidance are limited by the availability of financial and human resources. Knowledge of available services, guidance and providers is limited.

## Dimension VIII. Developing Learning Motivation and Skills or Creating a Culture of Lifelong Learning

Question	Answer
16. Are there awareness and promotion campaigns in place to support lifelong learning?	Yes
17 a. Does the promotion of learning to learn cover a children's life stage?	Yes
17 b. Does the promotion of learning to learn cover a youths' life stage?	Yes
17 c. Does the promotion of learning to learn cover a adults' life stage?	Yes
17 d. Does the promotion of learning to learn cover a seniors' life stage?	Yes

**Table 9.** Questions 16-17

All participants in the debate agreed that awareness-raising campaigns in the field of LLL and the promotion of such activities are carried out in our Region. There were examples of regular events carried out by various institutions, such as:

- **Małopolska Day of Learning (MDU)**, celebrated on 8 June, established by a resolution of the Małopolska Region Board of 27 May 2010; it aims to promote personal development and good organisation of leisure time among the people of Małopolska. The MDU formula will traditionally include free events organised for Małopolska residents by the institutions of the Małopolska Lifelong Learning Partnership. Every year, MDU is organised under a different motto, and each year brings together more than 50 organisers from all over Małopolska,
- **The Festival of Professions in Małopolska** is a three-day event organised every year, addressed primarily to pupils who are finishing their education in primary schools (previously in lower secondary schools). The festival is a kind of educational fair (advice, consultations, and interesting shows),

→ **The Educational Commune of Małopolska (EGM)** is a competition initiated by the MPKU in 2009. It is intended to promote the idea of lifelong learning locally. The competition makes it possible to identify and promote the Małopolska municipalities most actively supporting the personal and professional development of their residents. An important element of the EGM is local cooperation - both at municipality and village level. Meetings are organised specifically for this audience, during which the idea of lifelong learning is promoted. Village leaders and members of the Rural Housewives' Circles are the best ambassadors of this idea, thanks to which more and more Malopolans are training and developing.

In responding to the question of whether lifelong learning is promoted at all stages of life, voices were already strongly divergent. It was noted that the formal education system in primary and secondary schools promotes exam preparation rather than teaching learning, memorisation still being more important than understanding.

Career counselling for school-aged young people also came up in the discussion. A legislative change introducing compulsory career counselling in the 7th and 8th grade of primary school in 2019 was pointed out. At the same time, it was noted that the quality and availability (the statutorily defined number of hours is 10h per school year), of the introduced solution is not satisfactory.

When addressing the quality of career counselling in schools, it should be noted that counsellors providing these services are employees of the education system, not the labour market, and often their knowledge of current trends and changes in the labour market is not up to date.

In 2020, within the framework of strengthening cooperation between the Regional Labour Office in Kraków and the Małopolska In-Service Teacher Training Centre, the institution responsible for the work of vocational counsellors in schools, the Małopolska Congress of School Vocational Counselling was organised. Its main objective was to bring school career counsellors and teachers of all levels of education, who take care of pre-orientation and orientation of Małopolska students, closer to the issues and main trends of the Małopolska labour market, with particular emphasis on interesting sectors.

## Conclusions

- Lifelong learning is promoted among all age groups.
- There is a lack of a comprehensive approach based on the identification of current needs and resources as well as an evaluation of the effectiveness of measures taken.
- Lack of linkage between career counselling in schools and counselling in labour market institutions.



- The school education system is geared towards memorisation rather than shaping attitudes and building experiences or supporting motivation.

## Dimension IX. Professionalization of Educators and LLL Staff

Question	Answer
18 a. Does the regional authority support continuing professional development of management staff at school?	No
18 b. Does the regional authority support the continuing professional development teachers?	Yes
18 c. Does the regional authority support the continuing professional development of educators in informal education?	No

**Table 10.** Question 18

Professional development The Education Law and several related acts regulate the operation of public accredited teacher training centres operating in every region of Poland; in Małopolska this is the [Małopolska Centre for the Development of Teachers \(MCDN\)](#). The mission of the MCDN is to support the development of the regional education system for the benefit of future generations of a society based on knowledge and universal values. The aim of the MCDN is to support the professional development of teachers, educational management staff and the organisational development of schools and educational institutions in the implementation of tasks resulting from:

- current legislation,
- the directions of the educational policy of the state,
- regional policy in the field of education.

MCDN performs its tasks by, among others, organising and running cooperation and self-education networks, running in-service training forms for teachers and headmasters of schools/schools, including workshops, seminars, courses (qualifying, qualifying and in-service), conferences, training for teams of teachers commissioned by the head of the school/schools, lectures and others, providing consultations, disseminating examples of good practice and informing teachers about the forms of education, further education and in-service training available in the voivodeship.

Referring to the system solutions presented, the participants agreed that both teachers and management staff receive support in their professional development.

Disagreements arose when agreeing the answer to the question in relation to educators in the field of non-formal education. In the end, a positive answer was agreed, but with the comment that these are activities of individual institutions or aimed at selected sectors. Examples were identified:

- **Małopolska Institute of Culture (MIK)**, a self-governing cultural organisation organised by the Małopolska Voivodeship, which, as part of its statutory activities, prepares a broad educational offer in the form of seminars, webinars, workshops for employees of the cultural sector;
- the Regional Centre for Social Policy (ROPS), which, as part of the implementation of EU funds, carries out projects aimed at creating and implementing an educational offer for designated groups.

Within MSUES, the cadres of educators and counsellors are an important area for standardisation. Independently of the discussion, there were voices questioning the creation of this offer in a permanent and systematic way, or pointing to the omission of certain groups, such as non-formal educators.

### Conclusions

- There are systemic solutions for improving the competences and qualifications of formal education staff, both teachers and managers.
- The use of MSUES fosters the quality of educators and supports their improvement. The system of support for the development of trainers and educators of non-formal education, particularly those operating outside public institutions, is underdeveloped.

## Dimension X. Promoting Demand

Question	Answer
19. Are learners financially supported to access available learning opportunities?	Yes
20 a. Are there initiatives in place to support learners with Special Needs?	Yes
20 b. Are there initiatives in place to support learners with migrant background?	Yes
20 c. Are there initiatives in place to support long-term unemployed?	Yes

Question	Answer
20 d. Are there initiatives in place to support unemployed youth?	Yes
20 e. Are there initiatives in place to support unemployed women?	Yes
20 f. Are there initiatives in place to support other categories?	Yes

**Table 11.** Questions 19-20

In Małopolska, a support system financed from national and European funds is operating efficiently. The National Training Fund (KFS), which is distributed regionally, is a labour market instrument which at its core is to allocate a part of the contribution paid by employers to the Labour Fund to support adult learning undertaken on the initiative or with the consent of the employer. In 2014-20, the regional KFS budget amounted to PLN 91.2 million and PLN 20 million and PLN 17.6 million in 2021 and 2022 respectively.

At the same time, several ESF-financed initiatives are being implemented, under which both residents and entrepreneurs from Małopolska can receive financial support for their development plans. These initiatives primarily concern adults, but do not overlook any of the groups with special needs.

As part of the Regional Operational Programme (ROP), initiatives aimed at:

- entrepreneurs of the SME sector, who were granted support enabling them to improve the competencies and qualifications of their staff in accordance with their reported needs in this respect. The implementation of the intervention was based on a subjective system of financing (training or development vouchers), in which the decisive role in the selection of development services is played by the entrepreneur. It is he who, after analysing the current development needs of his employees or his own, selects an adequate development service (training or counselling voucher) to be used by his employees or himself. The value of implemented assistance in the 2014-2020 financial perspective (until 2022 inclusive) is PLN 151 million.
- adults from Małopolska within the framework of projects such as Kierunek Kariera, Kierunek Kariera Zawodowa and Łap Skilla! with a total value of nearly PLN 200 million. The financial support provided under these projects was preceded each time by a meeting with a career counsellor and a career audit (in the Region, in the years 2015-2022, as a part of the projects implemented by the Regional Labour Office in Kraków, nearly 50 thousand career audits were carried out). The aim of the audit is to summarise the previous educational and professional experience, to identify competence gaps and

key areas for the development of the person benefiting from the audit. As a result, adults make more informed educational decisions and are more motivated to develop.

In addition, the WUP in Kraków tested and then implemented a subjective financing system (PSF) in the form of training vouchers, which facilitated access to support measures for both entrepreneurs and individuals, ensuring pre-financing of the public part and leaving only the obligation to pay an own contribution on the part of beneficiaries. Another advantage of the PSF is access to a wide range of training courses available in the Development Services Database, presenting the offer of training companies from all over Poland and meeting quality standards.

Based on the experience of our Region, the [Guidelines for the 2021-2027](#) perspective for all Regional Programmes make use of subjective systems of financing development services when it comes to support directed to adults who, on their own initiative, want to improve their skills/competences/qualifications.

### Conclusions

All groups of the population of Małopolska have access to financial support enabling them to develop their competences and qualifications. Małopolska is a precursor of directing support to adults under the subjective system of financing development services with the use of training vouchers and development vouchers. The solutions developed in the Region are currently being scaled up and implemented in all regions of the country.

## Dimension XI. Reducing the Digital Divide in Accessing LLL

Question	Answer
21. Is access to online learning opportunities part of the regional LLL policy?	Yes
22. Is there a quality system for digital learning provided, implemented by regional authorities?	Yes
23. Are learning outcomes of digital learning assessed and certified?	Yes, partially
24. Are there specific measures to help older or disadvantaged learners to access digital learning?	Yes

**Table 12.** Questions 21-24

In the first year of the pandemic, the Region's Board decided to implement the project "Małopolska Anti-Crisis Shield - Education Package. Digitisation of schools and educational

institutions" (financed from EU funds), aimed at schools in the Małopolska Region. Its aim was to enable the transition from the traditional, stationary model of education to the remote learning model by providing grants for the purchase of equipment to the authorities running public and non-public schools:

- the necessary mobile computer equipment, its insurance, Internet access, software and other necessary accessories (ICT equipment) for distance learning by schools and institutions;
- specialised digital equipment necessary to carry out digital transformation and STEAM teaching using the Competences 4.0 concept, enabling the creation of 22 model schools.

Regarding certification of the results of online training, the lack of responsibility of the Region in this area was raised. Most recognised training in this area has its own certification systems and an automated pathway, e.g., English language certificates awarded by the British Council. The question was considered too detailed, even technical.

### Conclusions

- Region creates tools to support the development of remote development services.
- Quality of remote services is ensured by national solutions (SUZ).

## Dimension XII. Supporting Lifelong Learning

Question	Answer
25. Is the job-related training of adults supported by regional/public financial support?	Yes
26. Are other forms of education and training (non-job-related) supported by regional/public financial support?	Yes

**Table 13.** Questions 25-26

A number of undertakings related to the professional development of adults are implemented in Małopolska and the vast majority of them are financed from European funds, mainly from the European Social Fund and regional funds from the budget of the Małopolska Region and the state budget (e.g., KFS funds and the Labour Fund). These undertakings are usually implemented in the form of projects.

One of the leaders in the implementation of systemic solutions in the area of professional development of adult residents of Małopolska is the WUP in Kraków. To this end, it uses European and regional budget funds from the Regional Operational Programme for the Małopolska Region (ROP WM), the Operational Programme Knowledge Education

Development (PO WER) and the Labour Fund. Individual counselling support and funding in the form of training and development vouchers is dedicated to all groups of the adult population of the Region, including young, working, 50+ and returning Poles from abroad, employers and Ukrainian citizens. Altogether, in the period 2016-2023, the WUP projects planned to support more than 67,000 residents for a total amount of more than PLN 205 million. The most important projects implemented by the WUP in Kraków are primarily:

- **the Career Guidance (KK), Vocational Career Guidance (KKz), Catch the Skill! (ŁS)** were planned and developed in the course of implementation with the working inhabitants of Małopolska in mind in order to provide them with support in updating or acquiring new qualifications. In the face of ongoing technological changes, such as automation and digitisation, continuous upgrading and updating of qualifications is a necessity. Modern employment services, which include the WUP in Kraków, should not only support the unemployed, but also prevent people from losing their jobs due to a lack of necessary qualifications. Project participants can take advantage of career counselling in order to raise awareness of their professional and educational choices, funding for training, other forms of learning and/or confirmation of qualifications using the region's tried and tested system of funding in the form of training vouchers. In addition, adult learning is promoted through awareness-raising activities about the need for lifelong learning. The total value of the projects is almost PLN 200 million, and over 65,000 people will be supported (respectively 46,500 people in KK, 17,898 people in KKz, 1,000 people in ŁS).
- **The New Strat in Małopolska (NS) and Return with POWER! (WzP)** are projects offering assistance to people returning from abroad in finding their way and professional activation after returning to Małopolska, and above all in using their experience gained abroad to develop, educate and obtain employment in Małopolska. Project participants are also economically inactive or unemployed persons over 30 years of age who are in a difficult situation on the labour market. Comprehensive individual support and professional counselling services, psychological counselling, legal counselling, translation, workshops, and the possibility of using training vouchers in the Kierunek Kariera and Kierunek Kariera Zawodowa projects are envisaged for them. The total value of the projects is over PLN 3.4 million, and support will be provided to 1,482 people (respectively, 950 people in NS, 532 people in WzP).
- **Learn from a Master** is an innovative project for small and medium-sized enterprises in the hairdressing, cosmetics, hotel, and catering sectors, which were particularly affected by the COVID -19 pandemic. The project promotes and tests learning in the workplace (on-the-job learning) in real working conditions, through action, under the guidance of an experienced professional - a master in his or her field, in a one-to-one relationship or in groups of up to two people. The project has created a database of development services and uses a specially modified system of subjective financing of training in the form of development vouchers. The value of the project is over PLN 4.8 million, and support will be provided to 300 employees from 200 companies, and 222 people are expected to improve their competences.

For information about the projects at the Polish Labour Office in Cracow, go to [pocigdokariery.pl](http://pocigdokariery.pl).

In Małopolska, in addition to public and regional funding for adult training, other forms of (non-work-related) education supported by these funds are also promoted. An interesting regional undertaking in the area of training and broadly defined education of residents is the [Małopolska's Virtual Museums](#) portal, created by the Regional Digitalisation Workshop of the Małopolska Institute of Culture in Krakow. Digital representations of museum exhibits from several dozen museums in Małopolska are available there in 3D and 2D form. It is worth noting that the portal contains 3D models of the highest quality currently available on the Polish Internet, as well as a unique collection of links and interpretations of important issues by specialists in various fields. Each exhibit can be viewed up close and you can learn more about it – thanks to museum metrics, contextual articles, interconnected objects, educational materials, and thematic exhibitions. More than 600 objects have been recorded using the audio description technique for the blind and visually impaired, and selected content of the portal is also available in audio version, read out by well-known actors associated with Małopolska. The portal is dedicated to educators, museum professionals, enthusiasts of all ages, tourists, and artists.

Currently, the portal presents 2,723 museum exhibits, including 1,184 3D ones from 49 museums and institutions in the Małopolska Region, and their number is constantly growing.

### Conclusions

- The development of the professional competences of the people in Małopolska is supported by the funds available to the Region.
- From 2016 to the end of 2023, a total of more than 50,000 Małopolans will benefit from the opportunity to meet with a vocational advisor and obtain funding for training in the projects of the Regional Labour Office in Kraków.
- The value of the own projects of the Regional Labour Office in Kraków in the area of training of adults, financed from public funds of the EU and the Region, will amount to more than PLN 205 million by the end of 2023.

## Dimension XIII. Valuing Learning

Question	Answer
27. Is there a validation system for all adult learning?	Yes / No

**Table 14.** Question 27



The system of validation of learning outcomes is being developed at national level by the Educational Research Institute (IBE) in Warsaw as the Integrated Qualifications System (ZSK).

The ZSK describes, organises, and collects various qualifications in a single, publicly accessible register - the Integrated Qualifications Register (ZRK). This is intended to make it easier for individuals to confirm skills acquired in different ways. Małopolska is actively participating in the development of these solutions.

In 2014, the Regional Labour Office in Kraków, in partnership with the Educational Research Institute in Warsaw, joined the project entitled Building the National Qualifications System - pilot implementation of the National Qualifications System and an information campaign on its functioning. Its aim was to develop, test and prepare for the implementation in Poland of the Integrated Qualifications Register and the process of validating the effects of learning, i.e., confirming competences. The Integrated Qualification System currently in operation was developed with the participation of the Małopolska Region, including the Regional Labour Office in Kraków, and was tested here.

Currently, the IBE is responsible for the functioning and development of the Integrated Qualification System.

The Regional Labour Office in Kraków, continues to cooperate with and support the IBE in this respect, by developing and including market qualifications in the register, mobilising regional institutions to create descriptions of new market qualifications, or encouraging the best training institutions, which have the MSUES quality mark, to aspire to become certifying institutions for individual market qualifications.

In addition, in 2017-2019, the Regional Labour Office in Kraków implemented the international project Validation of informal and non-formal learning outcomes (EFFECT VPL) within the ERASMUS+ programme. In cooperation with representatives from Denmark, Germany, Turkey, and Wszechnica of Jagiellonian University in Krakow, among others, the following was prepared: Handbook for Individuals, Handbook for Entrepreneurs – Indicating the need and benefits of the validation process (responsible for the task Wszechnica UJ and Regional Labour Office in Kraków) and a modular training programme for experts to conduct validation workshops was developed. The project partners participated in the international conference 'The 3-rd VPL Biennale' in Berlin in May 2019. The EFFECT VPL project and its results were recognised and presented at the VPL-Prize gala in the field of 'best VPL policy, product and practice'.

## **Conclusions**

- The system for validation of learning outcomes is set up at national level and disseminated in the regions by IBE regional coordinators.
- The system could be supplemented by validation based on the potential of employers in specific industries, but for the time being there is a lack of ideas on how to organise this and of incentives for employers.

## Area 3. Monitoring and Evaluation

### Dimension XIV. Capacity to Evaluate Results, Progress and Impact of Regional LLL Policies

Question	Answer
28. Is a formal evaluation for LLL policies in place at the regional level?	No
29. How frequently are evaluation activities conducted?	Not applicable
30. Are evaluation reports publicly available?	Not applicable
31. Are all Stakeholders categories aware/ involved in the evaluation?	Not applicable
32. Are evaluation results actually used to improve LLL policies?	Not applicable
33. Is collaboration regularly evaluated?	Not applicable

**Table 15.** Questions 28-33

The lack of a regional policy in the field of lifelong learning prevents its evaluation. However, numerous projects in the field of LLL in the Region are subject to evaluation. Given that LLL activities are largely financed from the ESF, it is worth considering the introduction of evaluation mechanisms in the Region to the tasks of the RPO Steering Committee (in the current financial perspective FEM 2021-27 / European Funds for Małopolska 2021-27).

#### Conclusions

- The Region currently lacks systematic evaluation mechanisms for lifelong learning activities.
- It is proposed that the planning and coordination of evaluation activities in the Region be included in the tasks of the ROP Steering Committee.

# Appendix

## Area 1. Designing Policy / Strategic Level

### Dimension I. The Placing of LLL in a Regional Development Strategy

Question	Answer
1. Is lifelong learning an important focus of the regional development plan or of the regional strategy?	Yes

### Dimension II. Promoting and Implementing Democratic Governance within the Regional LLL System

Question	Answer
2. Are stakeholders, learners and educators involved in the governance system of LLL (or specific education sectors)	Yes

### Dimension III. Inter-institutional Coordination and Integration of LLL Policies

Question	Answer
3. Does a lifelong learning policy exist at regional level?	No
4 a. Does a lifelong learning policy cover a formal education sector?	No
4 b. Does a lifelong learning policy cover an informal education sector?	No
4 c. Does a lifelong learning policy cover an all age-groups education sector?	No
5 a. Is there financial cooperation and coordination between central and regional levels?	No
5 b. Is there administrative cooperation and coordination between central and regional levels?	No

Question	Answer
5 c. Is there any other cooperation and coordination between central and regional levels?	No

#### Dimension IV. Identifying Learner Needs and Monitoring Participation

Question	Answer
6. Does the region monitor the participation rates in LLL? Does the region monitor emerging learning needs?	No
7. How frequently does monitoring occur?	Yearly
8. Are there tools and incentives to identify and communicate learning needs?	No
9. Are organizations provided with tools and incentives to identify learning needs?	No

#### Dimension V. International Comparisons, Cooperation and Learning

Question	Answer
10. Is the Region a member of an overarching association or network specifically focused on LLL or more specific education sectors?	Yes / No
11. Are exchange learning opportunities in place?	Yes

#### Dimension VI. Managing and Sustaining Partnerships

Question	Answer
12. Has the regional authority promoted, supported, and achieved sustainable partnerships for lifelong learning?	Yes
13 a. Are there multi-stakeholder partnerships?	Yes
13 b. Are multi-stakeholder partnerships supported by regional authority?	Yes
13 c. Are multi-stakeholder partnerships promoted?	Yes

Question	Answer
14. Are there multi-stakeholder partnerships?	Yes

## Area 2. Implementation

### Dimension VII. Information and Guidance

Question	Answer
15. Is the information easily accessible to all, i.e., if stakeholders' specific needs taken into account?	Yes

### Dimension VIII. Developing Learning Motivation and Skills or Creating a Culture of Lifelong Learning

Question	Answer
16. Are there awareness and promotion campaigns in place to support lifelong learning?	Yes
17 a. Does the promotion of learning to learn cover a children's life stage?	Yes
17 b. Does the promotion of learning to learn cover a youths' life stage?	Yes
17 c. Does the promotion of learning to learn cover a adults' life stage?	Yes
17 d. Does the promotion of learning to learn cover a seniors' life stage?	Yes

### Dimension IX. Professionalization of Educators and LLL Staff

Question	Answer
18 a. Does the regional authority support continuing professional development of management staff at school?	Yes
18 b. Does the regional authority support the continuing professional development teachers?	Yes
18 c. Does the regional authority support the continuing professional development of educators in informal education?	Yes

**Dimension X. Promoting Demand**

Question	Answer
19. Are learners financially supported to access available learning opportunities?	Yes
20 a. Are there initiatives in place to support learners with Special Needs?	Yes
20 b. Are there initiatives in place to support learners with migrant background?	Yes
20 c. Are there initiatives in place to support long-term unemployed?	Yes
20 d. Are there initiatives in place to support unemployed youth?	Yes
20 e. Are there initiatives in place to support unemployed women?	Yes
20 f. Are there initiatives in place to support other categories?	Yes

**Dimension XI. Reducing the Digital Divide in Accessing LLL**

Question	Answer
21. Is access to online learning opportunities part of the regional LLL policy?	Yes
22. Is there a quality system for digital learning provided, implemented by regional authorities?	Yes
23. Are learning outcomes of digital learning assessed and certified?	Yes, partially
24. Are there specific measures to help older or disadvantaged learners to access digital learning?	Yes

**Dimension XII. Supporting Lifelong Learning**

Question	Answer
25. Is the job-related training of adults supported by regional/public financial support?	Yes

Question	Answer
26. Are other forms of education and training (non-job-related) supported by regional/public financial support?	Yes

**Dimension XIII. Valuing Learning**

Question	Answer
27. Is there a validation system for all adult learning?	Yes / No

## Area 3. Monitoring and Evaluation

**Dimension XIV. Capacity to Evaluate Results, Progresses and Impact of Regional LLL Policies**

Question	Answer
28. Is a formal evaluation for LLL policies in place at the regional level?	No
29. How frequently are evaluation activities conducted?	Not applicable
30. Are evaluation reports publicly available?	Not applicable
31. Are all Stakeholders categories aware/ involved in the evaluation?	Not applicable
32. Are evaluation results actually used to improve LLL policies?	Not applicable
33. Is collaboration regularly evaluated?	Not applicable

