Input for the "Reskilling and upskilling - evaluation of individual learning accounts" call for evidence

EUROCHAMBRES

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“Reskilling and upskilling - evaluation of individual learning accounts” call for evidence

Increasing participation in adult learning remains a major challenge. With participation at around 40%, the EU remains far from its target of at least 60% of adults participating in training every year by 2030. Individual Learning Accounts (ILAs) can contribute to this objective by facilitating access to up-and reskilling opportunities, but they are one instrument among several and should complement existing national, regional, sectoral and employer-led training arrangements.

Implementation of the 2022 Recommendation remains uneven across the EU, with ILAs operational in some Member States and still being developed or piloted in others. This needs to be reflected in the evaluation. Where implementation is recent or at pilot stage, it may be too early to assess effects on adult learning participation, employability, occupational mobility or skills shortages. The evaluation should therefore distinguish between progress in establishing ILA frameworks and their demonstrated outcomes and assess whether they provide added value within the wider national adult-learning and training system.

1. Evaluate outcomes, not the existence of an ILA system alone

The evaluation should focus on the actual outcomes of ILAs, rather than primarily on their formal establishment or take-up. Participation figures, accounts created or courses completed do not alone show whether the instrument is effective.

Of particular relevance for chambers and companies is whether ILA-supported training responds to labour-market and skills needs, leads to identifiable and recognised learning outcomes, and supports employability and labour-market transitions. Given the pace of technological change, including the growing impact of AI on job content and skills requirements, ILA frameworks should also be regularly updated to ensure that supported training keeps pace with evolving labour-market needs, rather than reflecting a static list of eligible skills or qualifications. This reflects Eurochambres’ longstanding position that increasing participation in adult learning must go hand in hand with ensuring the relevance of training. Chambers can contribute through their labour-market and skills intelligence, and their direct knowledge of companies and territorial skills needs.

2. Respect different national systems and avoid duplication

Eurochambres has consistently stressed that ILAs should respect the diversity of national training systems and avoid a one-size-fits-all approach. Existing training, financing, guidance and validation mechanisms should be complemented, not duplicated. The evaluation should assess how ILAs interact with existing systems and what additional value they provide, while allowing sufficient flexibility for different national contexts.

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3. Assess the full enabling framework, not only financial entitlements

Financial support is an important barrier to participation in adult learning, but it is not the only one. The Recommendation itself recognises this by placing ILAs within a broader enabling framework including career guidance, skills assessment, validation opportunities. The evaluation should therefore assess whether these elements work effectively together.

Individuals need accessible information and guidance to understand their existing skills, identify appropriate training and make informed choices. This is particularly important for people who participate less frequently in adult learning or who may find training systems difficult to navigate. Raising awareness of ILAs from an early stage, including through schools, career guidance services and employer communications, would help ensure that lifelong learning embeds itself into one’s careers.

Chambers can contribute to this enabling framework through guidance, skills assessment and validation, labour-market intelligence and their links with companies and training providers. The evaluation should consider how existing structures and intermediaries can support effective implementation.

4. Ensure that implementation works for SMEs

The evaluation should pay particular attention to the practical impact of ILAs on SMEs. For smaller companies, barriers to training are not only financial: limited HR capacity and difficulties identifying suitable training can affect participation. ILA implementation should therefore avoid additional administrative or financial burdens for SMEs.

Training undertaken during working hours also requires particular attention. Employers should retain a degree of autonomy over the training undertaken by employees, particularly when it occurs during working hours. The evaluation should consider how ILA arrangements work in practice for SMEs. For SMEs in particular, the evaluation could also take into account the operational impact of releasing employees for training during working hours

5. Ensure clear and workable financing and administration

Feedback from the Eurochambres network highlights the importance of clear financing and administrative arrangements. ILA implementation should build on existing training and financing mechanisms and avoid creating additional complexity or costs, particularly for SMEs.

The evaluation should therefore consider how ILAs are financed and administered in practice, how responsibilities are divided between the actors involved, and how they interact with existing training schemes. This is particularly important where ILAs are still being piloted and their longer-term financing and integration into national systems remain to be tested.

Conclusion

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Eurochambres supports the objective of enabling more adults to access relevant up-and reskilling opportunities. However, given the different stages of ILA implementation across Member States, the evaluation should distinguish between progress in establishing ILA frameworks and evidence of their actual impact.

From the perspective of chambers and businesses, the key questions are: Are ILAs reaching people who would otherwise participate less in training? Is the training relevant to labour-market needs and are the skills acquired recognised and transferable? Do ILAs add value to existing training systems rather than duplicate them? Are they workable for SMEs without creating additional burdens? And are the financing and administrative arrangements sustainable?

Eurochambres – the association of European chambers of commerce and industry – represents over 20 million businesses via its network of national chambers across Europe. Chambers' member businesses – of which around 93% are SMEs - collectively employ over 120 million people.

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