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EN

RESKILLING AND UPSKILLING: EVALUATION OF INDIVIDUAL LEARNING ACCOUNTS

CONSULTATION CONTRIBUTION

The European Confederation of Independent Trade Unions (CESI) is a confederation of more than 40 national and European trade union organisations from across Europe, with a total of more than 6 million individual members. Founded in 1990, CESI is a recognised European sectoral social partner and advocates improved employment conditions for workers in Europe and a strong social dimension in the EU.

Preliminary remarks

CESI welcomes the European Commission's evaluation of the Council Recommendation of 16 June 2022 on individual learning accounts.¹ The Recommendation pursues a necessary objective: Enabling all working-age adults to access labour-market-relevant training, irrespective of employment or professional status, while increasing motivation to engage in upskilling and reskilling. This objective is integral to Principle 1 of the European Pillar of Social Rights and to the Union target of at least 60% of adults participating in training every year by 2030.

The evidence received from CESI member organisations – especially from Germany, Spain and Luxembourg – indicates that implementation remains uneven. Existing national instruments often support lifelong learning, guidance, validation or paid training leave, but they do not necessarily provide universal, portable and accumulable individual learning entitlements. The evaluation should therefore distinguish clearly between measures that contribute to the Recommendation's enabling framework and the actual establishment of an individual learning account.

CESI supports individual learning accounts where they provide an additional, enforceable and adequately funded route into quality training. They must supplement – and must not replace – employers' obligations to provide job-related training, collective training rights, paid training leave or publicly funded education and training. The cost and time burden of adapting to technological, organisational and environmental change must not be transferred from employers and public authorities to individual workers.

¹ https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=oj:JOC_2022_243_R_0003

Assessment of implementation

A. Effectiveness

The Recommendation has encouraged policy development, but the available evidence does not demonstrate that its two objectives have yet been achieved consistently across the EU.

This points to a material implementation gap between the Recommendation's architecture and national delivery. The European Commission should assess not only whether instruments exist, but whether adults can understand, access and use a concrete entitlement without employer dependency, excessive administrative burden or loss of income.

In Spain, Royal Decree 438/2024² introduced individual learning accounts into the common portfolio of services of the National Employment System and envisaged the identification and accumulation of personal training rights throughout a person's working life. However, a universal operational system with a defined annual entitlement, clear accumulation and expiry rules, portability between labour-market statuses and a single point of access does not yet appear to be available.

Germany has not established a comprehensive individual learning account or a universal statutory right to continuing training. Support remains organised through targeted programmes, employer-funded training, Federal Employment Agency instruments, guidance services, digital platforms and educational leave legislation at Land level. The national portal 'mein NOW'³ improves access to information on courses, funding and guidance, but does not itself provide an individual account or a nationally uniform training entitlement.

Luxembourg has likewise not established a comprehensive individual learning account. It relies on complementary measures, including individual training leave, recognised training provision, career guidance, validation of prior learning and dedicated public-service and digital-skills platforms.⁴ These measures support participation and reflect parts of the enabling framework, but they do not create portable individual entitlements. Luxembourg's individual training leave demonstrates the importance of combining access to learning with protected time and continued income.

² <https://www.boe.es/buscar/pdf/2024/BOE-A-2024-8710-consolidado.pdf>

³ <https://www.arbeitsagentur.de/karriere-und-weiterbildung/nationales-onlineportal-berufliche-weiterbildung-mein-now>

⁴ <https://guichet.public.lu/en/citoyens/famille-education/formation-adultes/conge/conge-individuel-formation.html>

C. Efficiency

Fragmented funding schemes, portals, registers and governance structures can increase administrative costs and make access difficult for workers and employers. Efficiency should therefore be assessed from the learner's perspective as well as from the perspective of public administration. A system is not efficient if nominal support remains unused because eligibility is unclear, guidance is unavailable, training cannot be reconciled with working or caring responsibilities, or several unconnected portals must be navigated.

The European Commission should examine the cost per successful and quality-assured training outcome, administrative processing times, the additionality of public expenditure and the distribution of uptake. Digitalisation can reduce administrative burdens, but digital portals must remain accessible to persons with disabilities and people with limited digital skills. In-person guidance and non-digital access routes must remain available.

D. Coherence

Individual learning accounts should form part of coherent national lifelong-learning systems and be connected to career guidance, skills forecasting, validation of non-formal and informal learning, quality assurance, micro-credentials, vocational education and training and active labour-market policies. They should also be consistent with collective agreements, sectoral training funds and public-service training frameworks.

CESI has previously called for worker-centred skills policies with guaranteed access to lifelong learning, adapted vocational education and training, publicly funded training on the job and strong trade union involvement. It has also emphasised that micro-credentials must be transparent, quality-assured and capable of contributing to recognised qualifications.⁵ The evaluation should test whether national account systems support these objectives rather than creating parallel, fragmented markets for short courses of uncertain labour-market value.

E. Relevance

The Recommendation remains highly relevant in view of the digital and green transitions, demographic change, persistent labour and skills shortages and restructuring. Relevance nevertheless depends on the capacity to reach those facing the greatest barriers. Priority access and additional entitlements should be provided, where appropriate, to workers with low qualifications, temporary and part-time workers, unemployed and inactive persons, the self-employed, older workers, persons with disabilities, workers in small and micro-enterprises, public-service workers and persons in rural or remote areas.

Moreover, training must be usable in practice. Where learning relates to current work, employer-driven change or mandatory professional requirements, it should take place during paid working time and be financed by the employer. More generally, adequate paid training leave and income support are indispensable to prevent unequal uptake. The design of accounts must take account of caring responsibilities and gender inequalities; otherwise, formally equal entitlements may reproduce existing participation gaps.

⁵ <https://www.cesi.org/posts/cesi-union-of-skills-initiative-must-look-to-improve-professional-training-recognition-of-qualifications-and-fair-transitions>



F. EU added value

EU coordination has added value by setting a common direction, promoting mutual learning and linking individual entitlements to an enabling framework. The Recommendation also provides a basis for comparable monitoring across Member States. Its added value is, however, constrained where national implementation remains voluntary, fragmented or limited to relabelling existing instruments.

The European Commission should use the 2027 report to identify implementation gaps by Member States, disseminate effective practices and specify the minimum information needed to compare coverage, entitlement value, portability, uptake and outcomes of individual learning account schemes.

G. Governance, social dialogue and the role of public services

All relevant national trade unions must be involved structurally in the design, implementation, monitoring and evaluation of individual learning accounts, including decisions on eligible training, quality standards, priority groups, funding, paid leave and the interaction with collective agreements. So far, consultation after key design choices have been made is insufficient. The German evidence, in particular, illustrates the need to ensure that public-service workers and their representatives are systematically included in overarching continuing-education strategies.

Well-resourced public employment services and education and training institutions are essential. Individual learning accounts should not be used to commercialise training provision or weaken stable public investment in education and vocational training. Training providers and educators themselves require adequate staffing, professional development and decent working conditions.

Recommendations

CESI calls on the European Commission and Member States to:

- establish transparent national implementation plans with timelines, responsible authorities, sustainable funding and measurable targets for coverage, uptake and completion;
- ensure that every working-age adult can access a meaningful, portable and accumulable learning entitlement, with additional support for groups facing structural barriers;
- guarantee that individual entitlements supplement employers' training duties, collective rights, paid training leave and publicly funded education and training;
- provide paid training time and, where necessary, income and care support so that entitlements can be used without financial disadvantage;
- create accessible single portals linking entitlements, quality-assured eligible training, funding, guidance and validation services, while retaining in-person and non-digital access;
- apply robust and transparent quality criteria to eligible provision and ensure that micro-credentials can contribute to recognised qualifications rather than fragmenting learning pathways;
- embed trade union participation in governance and monitoring at national, regional and sectoral levels and respect collective bargaining and social-partner autonomy; and
- gather and publish monitoring data on allocation, uptake, completion and labour-market outcomes, including by employment status, age, gender, disability, qualification level, sector and territory.