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Initiative on individual learning accounts

Fields marked with * are mandatory.

1 Introduction

2 About you

*2.1 Language of my contribution

English

*2.2 I am giving my contribution as

Business association

*2.3 First name

Vincenzo

*2.4 Surname

Renda

*2.5 Email (this won't be published)

vincenzo.renda@digitaleurope.org

*2.9 Organisation name

255 character(s) maximum

DIGITALEUROPE

*2.10 Organisation size

Small (10 to 49 employees)

2.11 Transparency register number

255 character(s) maximum

Check if your organisation is on the transparency register (http://ec.europa.eu/transparencyregister/public /homePage.do?redir=false&locale=en). It's a voluntary database for organisations seeking to influence EU decision-making.

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2.12 Country of origin

Please add your country of origin, or that of your organisation.

Belgium

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

2.14 Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the personal data protection provisions (https://ec.europa.eu/info/law/better-regulation /specific-privacy-statement)

3 Additional information about you

3.2 What is your organisation's primary role in training?

- Company providing training for its employees
- Education and training provider
- Accreditation or certification body/ provider of quality assurance
- O Public or private employment services providing information, advice, guidance or training

- National or regional organisation with responsibilities for adult learning and training (including the funding of training)
- Other role in training

3.3 Please specify

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European trade association with training providers and users within its membership
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4 Problem Definition

In this section, we would like to gather your views about the **main barriers** that prevent individuals from accessing training.

4.1 To what extent do you agree or disagree that following factors **related to costs** prevent individuals from accessing training?

	Fully agree	Somewha t agree	Somewhat disagree	Fully disagre e	l don't know
Direct cost of training (course fees, tuition)	۲	0	0	0	0
Indirect cost of training (loss of income due to time taken up by training)	۲	0	0	0	0
Insufficient awareness of available financial support for training	0	۲	0	0	0

4.2 To what extent do you agree or disagree that following factors **related to incentives and motivation** prevent individuals from accessing training?

	Fully agree	Somewh at agree	Somewhat disagree	Fully disagre e	l don't know
Insufficient awareness of the benefits of training	0	۲	0	0	0
Uncertainty about which skills are needed to improve employment and income prospects	۲	0	0	0	0
Fragmented/ insufficiently transparent information on available training opportunities	0	۲	0	0	0

Uncertainty about the quality of training opportunities	۲	0	0	0	0
Uncertainty about whether training outcomes will be recognised by employers	0	۲	0	0	0
Insufficient tailoring of available training to individual needs	0	۲	0	0	0

4.3 To what extent do you agree or disagree that following factors **related to time** prevent individuals from accessing training?

	Fully agree	Somewhat agree	Somewhat disagree	Fully disagree	l don't know
Lack of time (including work, family and other commitments)	۲	0	0	0	0
Inflexibility of training time (when training can be undertaken)	0	۲	0	0	0

4.4 To what extent do you agree or disagree that the following factors are **obstacles to a higher training provision on the labour market**?

	Fully agree	Somew hat agree	Somewh at disagree	Fully disagr ee	l don't know
Employer's fear to lose a worker once he or she has acquired better skills	0	۲	0	0	0
A lack of instruments for an effective sharing of training costs (between companies, individuals, public authorities)	0	۲	0	0	0
A lack of capacity by small, medium and micro- enterprises to organise training for their employees	۲	0	0	0	0
A lack of support for workers with no links, or lose links, to an employer (i.e. atypical workers such as platform workers)	0	۲	0	0	0

4.5 In your opinion, are there **other important barriers** to training participation or provision not previously mentioned? You can also use this space to elaborate on a previous answer:

500 character(s) maximum

The disconnection between training and employment opportunities for individuals can be tackled by both short-term courses and comprehensive reskilling/upskilling learning pathways that consider stronger company targets on employee training. There are significant cost differences in relation to the type of training and sector targeted. Training for medium and advanced digital skills is more cost-intensive than that for digital literacy skills. Accordingly, it demands tailored funding rules.

5 Need for EU action and policy objectives

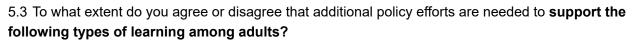
5.1 To what extent do you agree or disagree that a European initiative on individual learning accounts could **add value on the following topics?**

	Fully agree	Somewh at agree	Somewha t disagree	Fully disagre e	l don't know
Increased transparency about national training markets for companies operating on the single market	۲	0	0	0	0
Portability and recognition of training outcomes across Member States	• •		0	0	0
Portability of training entitlements across Member States	۲	0	0	0	0
More efficient use of EU funds for skills development	0	۲	0	0	0
Development of registries of quality-assured training opportunities at national level	0	۲	0	0	0
Implementation of quality assurance also for non-formal training opportunities	۲	0	0	0	0
Validation of non-formal and informal learning outcomes	۲	0	0	0	0
Provision of career guidance	0	0	0	0	۲
Provision of educational leave and its take-up by individuals	0	۲	0	0	0
Other topic	۲	0	0	0	0

5.2 Please explain

500 character(s) maximum

No single actor can solve the reskilling/upskilling challenge alone. Strong governments' involvement is needed to shape a framework for validation of outcomes and portability of entitlements. The focus must also be on stressing the positive causal correlation between training undertaken and employee efficiency resulting from it. Employee motivation is a must-have for the success of the Individual Learning Accounts. Employee co-financing of training is thus very much welcomed and recommended.



	Fully agre e	Some what agree	Somew hat disagre e	Fully disagr ee	l don't know
Short job-related training (e.g. for training within the current job)	۲	0	0	0	0
More fundamental job-related training (e.g. for a professional transition)	۲	0	0	0	0
Training in general transversal skills (basic skills, soft and inter-personal skills etc.)	۲	0	0	0	0
Training in digital skills	۲	0	0	0	0
Training in skills relevant for the green transition (i.e. skills required in sectors that are growing as economies become more environmentally sustainable)	۲	0	0	0	0
Non job-related learning	0	۲	0	0	0
Other types	۲	0	0	0	0

5.4 Please explain

500 character(s) maximum

Any policy effort should have value for money and be employment-related. Policy measures should foster flexibility in training, but also lead to the development of comprehensive reskilling/upskilling learning pathways for the digital transition of the workforce. Learners ask for more personalised training (i.e. shorter courses and stackable degrees) to have recognised their knowledge and skills gained via activities beyond traditional degree courses (i.e. certificates and badges).

6 Policy Options

In this section we would like to have your views on **possible building blocks** of policies to ensure that all people have the opportunity to keep building skills throughout their working life, including on individual learning accounts and other forms of providing individual training entitlements.

The European Commission's working definition of "**individual learning account**" is as follows: a personal account where individual training entitlements can be accumulated over time, possibly funded by different sponsors. Training entitlements from the account can be spent on training independent of the employment status and when requested by the individual.

The working definition of "**individual training entitlement**" is as follows: a personal budget to spend on training. Also guidance and validation offers may be eligible for funding from this budget.

We will ask for your views on the **effectiveness of the different building blocks** for addressing the three **main groups of barriers to training introduced in section 4:** costs/financial constraints, incentives and motivation and a lack of time.

6.1 To what extent do you agree or disagree that the following approaches are effective for **tackling the financial constraints** influencing participation in training?

	Fully agre e	Some what agree	Somew hat disagre e	Fully disagr ee	l don't know
Establish individual learning accounts	۲	0	0	0	0
Establish individual training entitlements in other forms (training vouchers, individual budgets etc.)	۲	0	0	0	0
Tax incentives for individuals	0	۲	0	0	0
Tax incentives for companies	0	۲	0	0	0
Subsidies to education and training providers	0	۲	0	0	0
Increase overall public funding available to support training (i.e., sum of funding provided to individuals, companies and education & training providers)	۲	0	0	0	0
Facilitate the sharing of training costs between companies, public authorities and individuals	۲	0	0	0	0
Other approach	۲	0	0	0	0

6.2 Please explain

500 character(s) maximum

Tax incentives or subsidies often require extra resources for their administration from the individual or the firm. This ultimately leads to scarcely using those opportunities. Should taxes/subsidies/cost exemptions be used to supporting training, it is critical their system is clear and simple. If well-designed, Individual Learning Accounts can minimise the administrative burden for both the individual and the firm, limiting training management efforts to government and training provider only.

6.3 To what extent do you agree or disagree that the following approaches are effective **for increasing incentives and motivation** influencing participation in training?

	Fully agre e	Somew hat agree	Somewh at disagree	Fully disagr ee	l don't know
Establish individual learning accounts	۲	0	0	0	0
Establish individual training entitlements in other forms (training vouchers, individual budgets etc.)	۲	0	0	0	0
Public registry of quality-assured training opportunities	۲	0	0	0	0
"One stop shop" digital platform and smartphone app that link a registry of quality training opportunities to financial support	۲	0	0	0	0
Publication of training course evaluations of past participants in the registry of quality-assured training opportunities	۲	0	0	0	0
Tax incentives for individuals	0	۲	0	0	0
Tax incentives for companies	0	۲	0	0	0
Subsidies to education and training providers	0	۲	0	0	0
Awareness raising campaigns	0	۲	0	0	0
In-person advice and guidance on training opportunities	۲	0	0	0	0
Opportunities for the validation of informal and non-formal learning outcomes	۲	0	0	0	0
Increase modularisation of the training offer (opportunities to acquire a certification on completion of short courses)	۲	0	0	0	0
Other approach	۲	0	0	0	0

6.4 Please explain

500 character(s) maximum

Through the Individual Learning Accounts, learners are responsible for their own training. Incentives for training provision will lead to competition and differentiation of training offers, increasing modularisation. Also, motivation is key for the success of the Individual Learning Accounts. The latter will not be used unless individuals understand the value of further training for them, and are part of the training system.

6.5 To what extent do you agree or disagree that the following approaches are effective **for helping to address time constraints** to participation in training?

	Fully agree	Somew hat agree	Somewh at disagree	Fully disagr ee	l don't know
Establish individual learning accounts	۲	0	0	0	0
Establish individual training entitlements in other forms (training vouchers, individual budgets etc.)	۲	0	0	0	0
Increase modularisation of the training offer (opportunities to acquire a certification on completion of short courses)	۲	0	0	0	0
Paid educational leave (granted by employer for employees)	۲	0	0 0		0
Allowance to cover the costs of living during training (open also to non-employees)	۲	0	0	0	0
Other approach	۲	0	0	0	0

6.6 Please explain

500 character(s) maximum

There must be focus on two factors in order to address time constraints in training participation: 1) training systems available for adults. 2) employers' agreement on employee training. This is critical to carve out the necessary time for employee training during working hours.

6.7 To what extent do you agree or disagree with the following options for **targeting individual training entitlements?**

	Full y agre e	Some what agree	Some what disagr ee	Fully disa gree	l don' t kno w
Universal support : Give training entitlements to all working-age individuals, no matter their current position on the labour market	0	۲	0	0	0
Universal, but differentiated support : Give training entitlements to all working-age individuals, and a higher amount to individuals with particular training needs	۲	0	0	0	0

Targeted support : Give training entitlements only to individuals with particular training needs (such as those in industries undergoing significant structural change, the unemployed, atypical workers or the low-qualified)	0	۲	0	0	0
Other approach	۲	0	0	0	0

6.8 Please explain

500 character(s) maximum

Universal but differentiated support is critical to prioritise skills in shortage and their related sectors, and thus prepare the workforce for labour market changes.

6.9 Giving individuals training entitlements goes hand-in-hand with the establishment of a **registry of training opportunities that are eligible** for funding from these training entitlements. To what extent do you agree or disagree with the following statements about the selection of eligible training opportunities/the **governance of this registry?**

	Fully agree	Somewh at agree	Somewha t disagree	Fully disagre e	l don't know
Strong role of employer organisations	0	۲	0	0	0
Strong role of trade unions	0	0	۲	0	0
Strong role of public authorities	۲	0	0	0	0
Strong role of skills intelligence/ research (information on skills in shortage on the labour market)	0	۲	0	0	0
Other	۲	0	0	0	0

6.10 Please explain

500 character(s) maximum

For transparency reasons, governments appear to be better positioned than other actors to govern the registry of training opportunities. Strong quality assurance mechanisms are imperative for a successful system of Individual Learning Accounts. However, a strong public role in the register should not hamper the registry's ability to adapt to changes in market needs, notably on emerging technologies. There should also be a mechanism to implement modifications to it as needed.

6.11 To what extent do you agree or disagree with the following possible **rules on how individuals can spend their individual training entitlements?**

	Fully agre e	Some what agree	Somew hat disagre e	Fully disagr ee	l don't know
Free selection from the registry of eligible training offers. For employees, training may take place during working hours with the agreement of the employer	۲	0	0	0	0
Free selection from the registry of eligible training offers. For employees, training is required to take place outside of working hours	۲	0	0	0	0
Restricted freedom in selection of training on the basis of compulsory prior guidance (e.g. by Public Employment Services)	0	0	۲	0	0
Other	0	0	0	0	۲

6.12 Please explain

500 character(s) maximum

6.13 To what extent do you agree or disagree that the following **sources should be used to increase available funding** for training?

	Fully agree	Somewha t agree	Somewhat disagree	Fully disagree	l don't know
Individual contribution	۲	0	0	0	0
Employer's levy (e.g. on payroll)	0	0	0	۲	0
Member States public funding	۲	0	0	0	0
EU funds (including the European Social Fund, Recovery Funds etc.)	۲	0	0	0	0
Other	۲	0	0	0	0

6.14 Please explain

500 character(s) maximum

Tax-financed schemes, however redistributive they may be, are sensitive to budgetary constraints and are likely to result in less predictable funding over time.

Mechanisms based on employers' levies can earmark relevant funding. But depending on the levy redistribution arrangement, they can lead to scenarios where large companies cumulate entitlements for training provisions without being able to spend them nor transfer them to other firms.

6.15 To what extent do you agree or disagree that the following **policy instruments would be suitable/effective** to ensure a sufficient access to and uptake of training opportunities across the EU?

	Fully agre e	Somew hat agree	Somewh at disagree	Fully disagr ee	l don't know
No additional instrument, the existing EU-level framework is sufficient	0	0	۲	0	0
Strengthen EU level monitoring and exchange of best practices (e.g. European Semester, Open Method of Coordination)	۲	0	0	0	0
Introduce EU legislation to be adhered by Member States on a voluntary basis (e.g. Council Recommendation)	۲	0	0	0	0
Other instrument	۲	0	0	0	0

6.16 Please explain

500 character(s) maximum

The options we support above are important for awareness-raising, including among Public Employment Agencies. Other measures we suggest are: 1) EURES to embed URLs into national platforms' info on training accounts. 2) CEDEFOP to monitor developments through reports / forecasts.

7 Expected impacts

In this section, we welcome your opinions on the **potential impacts of an individual learning accounts initiative**. The specific content of the initiative will depend on the impact assessment and stakeholder consultations, and possible recommendations would concern the building blocks covered in the previous sections of this questionnaire.

7.1 To what extent do you agree or disagree that the following impacts related to **fundamental and social rights** could result from an EU initiative on individual learning accounts?

	Fully agre e	Some what agree	Somew hat disagre e	Fully disagr ee	l don't know	
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Making it easier for individuals to manage transitions in the labour market (between different jobs or sectors, or from unemployment to employment)	۲	0	0	0	0
Improving employment prospects for unemployed by tailor made assistance	۲	0	0	0	0
Improving access to secure and adaptable employment regardless of the type and duration of the employment relationship	۲	0	0	0	0
Tackling discriminations on all grounds regarding access to training, employment prospects and career progression	۲	0	0	0	0
Improving health and wellbeing	0	0	0	0	۲
Promoting active citizenship and political participation	0	۲	0	0	0

7.2 To what extent do you agree or disagree that the following impacts related to the **labour market and the economy** could result from an EU initiative on individual learning accounts?

	Fully agree	Somewh at agree	Somewha t disagree	Fully disagre e	l don't know
Supporting an efficient reallocation of labour in light of structural changes or economic downturns	۲	0	0	0	0
Reducing skills gaps and mismatches	۲	0	0	0	0
Improving productivity and competitiveness of companies	۲	0	0	0	0
Supporting geographical labour mobility	۲	0	0	0	0

7.3 To what extent do you agree or disagree that the following impacts related to the **society and the environment** could result from an EU initiative on individual learning accounts?

	Fully agree	Somewha t agree	Somewhat disagree	Fully disagree	l don't know
Supporting digital and green transitions by providing relevant skills	۲	0	0	0	0
Improving cohesion in society	۲	0	0	0	0
Leading to upward convergence between Member States	۲	0	0	0	0

7.4 Are there any other expected impacts – positive or negative - you would like to indicate? 500 character(s) maximum

8 Concluding Questions

8.1 If you have any additional comments and/or suggestions, feel free to use the open answer box below *1,500 character(s) maximum*

A reasonable level of quality assurance is critical for the Individual Learning Accounts. It is key to avoid promoting misleading or unverified training content, which would not help individuals in their career progress. At the same time, quality assurance cannot lead to excessive bureaucracy, as that could result in people not wanting to participate in training (e.g. too many individuals struggling with reimbursement procedures) and/or may discourage training providers to be part of the system. This is why we support a reasonable degree of quality assurance in the system.

8.2 If you wish to upload position papers please do so here

Contact

Contact Form (/eusurvey/runner/contactform/dd5a4a59-e283-4f01-562f-1d0780375599)