



SKILLS TO GROW

The case for enhanced individual
learning accounts in Scotland

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Report

Skills to grow: the case for enhanced individual learning accounts in Scotland

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1 Executive summary

At the start of the new year, we look back at 2020 with a mixture of disbelief and relief. We have seen disruption to businesses, communities and personal lives that will have an impact for many years to come. But we have also seen amazing individual resilience, unprecedented government support and significant business innovation in the space of just a few months.

When we started planning this report over a year ago, we could not have foreseen what was to come. Our primary objective was to flesh out what contribution a form of individual learning account could make to meet the challenges posed by our changing economy and evolving skills needs. What this report now offers is a timely assessment of how enhanced ILAs can be used in our COVID-19 recovery too.

Even prior to COVID-19, there was an urgent case for strengthening Scotland's skills system. Before the pandemic struck, the 2020s looked to be defined by economic transitions demanded by automation and technological change, Brexit, responding to our climate crisis, shifting demographics and population ageing, and existing economic inequalities. Now, the COVID-19 crisis and the likelihood of ongoing restrictions stretching well into 2021 mean that Scotland will face these pre-existing transitions in a very different context than before.

In responding to the immediate challenges of COVID-19 and laying the groundwork for a just and sustainable economic recovery, plans will need to anticipate and respond to economic and social changes in the months and years ahead, prepare people and businesses for them, work with businesses to adapt to this context, and to bridge people from sectors that are contracting to the sectors of the future. Without question, increasing demand for skills among employers and employees, increasing utilisation of skills by employers, and shaping the supply of skills to be accessible in this new context will be crucial to Scotland's near- and long-term economic prospects.

Through the ongoing disruption associated with COVID-19 and into a post-pandemic world, ILAs offer particular strengths to learners, employers and skills providers across Scotland. As we look ahead and envisage a skills system fit for the challenges Scotland will face through the 2020s, ILAs offer flexibility and individualisation that enables them to be valuable and adaptable tools to support learners throughout their working lives, and through challenges from multiple fronts: be it as a tool to support early-career progression, as an opportunity to learn to work with new technologies, or as a means of accessing retraining that can support a smooth transition from high- to low-carbon industries.

While ILAs potentially have an important role to play in a twenty-first-century skills system that is resilient to the decade of transition ahead, they are clearly not a silver bullet. In assessing the relative strengths and weaknesses of ILAs, we can see that in iterations delivered so far, they have been most effective as a tool for stimulating demand for lifelong learning among working-age adults over 25 – and in doing so extending or reigniting engagement with the skills system. To be maximally effective, however, they will need to be combined with supply-side reform, effective quality assurance mechanisms, and made fully compatible with other forms of support that can support learners to embark on and progress on a learning journey that continues throughout their working lives.

Lessons from iterations of individual learning accounts seen so far in Scotland and other parts of the UK tell us that the level of funding attached to ILAs and the design of learning offers are often not well constructed to maximise impact. While a focus on tuition costs

will undoubtedly lower a crucial barrier for some, there are other persistent financial barriers that we know prevent engagement with the skills system. Increasingly, too, online provision works differently from in-person learning – and may indeed attract a different cohort of learners, with different ambitions and expectations.

This report is written in a devolved context and its recommendations are primarily aimed at the Scottish Government. However, there are some lessons offered to other legislatures across the UK, where the basic principles as proposed here can be used to design similar schemes to fit circumstances.

As we look towards the next Scottish Parliament election, our hope is that these proposals can form a part of the debate around our economic recovery, but also the long-standing challenges of rapid technological change, low productivity and poor adult skills development opportunities.

Our recommendations at a glance:

- ILA reform should be part of a package of wider reform of Scotland's skills system.
- ILAs should be buildable, with greater value and 'use it or lose it' funding.
- The Scottish Government should consider how best to incentivise employer top-ups to ILAs.
- ILAs should be supported – where possible – by employer buy-in.
- ILAs would be best supported through career pathways and sector-level buy-in.
- ILAs should be supported by action to boost learner retention and course completion.
- Additional support for living costs should be provided.
- ILAs should focus on responding to learner need rather than economic need alone.
- ILAs should be MOOC/online learning friendly.

2 ILAs in context

Even prior to COVID-19, there was an urgent case for strengthening Scotland's skills system. Before the pandemic struck, the 2020s looked to be defined by economic transitions demanded by automation, Brexit, climate, demographics and ageing, and existing economic inequalities. Scotland's skills system, as with the UK skills system, already faced strong headwinds from low rates of adult participation by comparison with our Western and Northern European neighbours, and declining employer contributions to adult learning and training.¹ Now, the COVID-19 crisis and the likelihood of ongoing restrictions stretching well into 2021 mean that Scotland will face these pre-existing transitions in a very different context than before.

In responding to the immediate challenges of COVID-19 and laying the groundwork for a just and sustainable economic recovery, plans will need to anticipate and respond to economic and social changes in the months and years ahead, prepare people and businesses for them, work with businesses to adapt to this context, and to bridge people from sectors that are contracting to the sectors of the future. Without question, increasing demand for skills among employers and employees, increasing utilisation of skills by employers, and shaping the supply of skills to be accessible in this new context will be crucial to Scotland's near- and long-term economic prospects.

Across the globe, the case for investing in upskilling and retraining for adult learners is gaining momentum. The World Economic Forum estimates that, on average, employees will need 101 days of retraining and upskilling in the period up to 2022. Depending on

industry and geography, between one half and two-thirds of companies are turning to freelancers, contractors and temporary staff to address skills gaps within their organisations.²

Individual skills accounts or individual training accounts could be one of a number of crucial ways to shape demand and supply of the skills provision needed in Scotland over the coming time. Equally, given the likely context of furlough, short-time working and high levels of unemployment for some time to come, they could be crucial mechanisms to get public funding invested quickly to stimulate demand in activity that will have long-term benefits for individuals and the economy as a whole. This flexibility in how such accounts are used is one of the key advantages of the recommendations made in this report.

Lifelong learning in Scotland and the UK

Scotland's skills system already faced significant challenges. The adult learner participation in formal education and training across the UK declined sharply from 2007-16, while participation rates were maintained elsewhere in Europe.³ In 2018, the UK-wide adult learning participation rate stood at 14.6% among 25-64-year-olds as compared with 11.1% across the EU28, 29.2% in Sweden and 18.6% in France.⁴

Part-time learning and training participation rates have fallen substantially among adult learners in Scotland over the last decade; meanwhile, employer contributions towards workforce training in Scotland have steadily declined over the decade from 2008-18.⁵

At the same time, prior to the pandemic, we saw the stalling of real-terms pay and living standards, unparalleled in modern times. Following the 2007-08 financial crash, Scotland, like the UK as a whole, saw stagnation in real-terms pay and flatlining productivity. While employment levels reached record levels, there were increasing concerns that job quality and routes to deliver career progression had been closed off for many. There had been increasing calls for investment in the skills system, and in particular lifelong learning, to focus on boosting career progression, productivity and pay.

Furthermore, Scotland's population is ageing faster than many other parts of the UK. Over the next decade people across Scotland will be living longer, and our working lives will span further. Demographic change will see mounting pressure on Scotland's working-age population to generate tax revenues to fund public services, and further, new demands on the skills system to cater to the needs of workers and learnings throughout their lives. This will further increase the need to find ways to boost productivity to protect living standards – and tax revenues – as the working-age population declines in relative terms to the non-working-age population.

In addition, Scotland is still facing a number of other economic and social transitions, including automation and digital innovation, with significant disruption to job roles likely through technological change, Brexit and climate change. Each will demand changes to the world of work, which will in turn make new demands of the skills system in Scotland, particularly those parts of the system focused on those already in work, or at risk of losing it.

These trends call for Scotland to embrace a culture of lifelong learning, in which individuals' relationship to the skills system is not cut off when they leave full-time education and enter the world of work, but instead continues throughout their working lives. The case for developing and investing in tools that can foster a lifelong relationship with the skills system for Scotland's workforce is only growing.

In April 2020, CIPD Scotland called for individual training account (ITA) eligibility to be expanded to those on furlough. While this expansion has been rapidly delivered in Wales,

no such action has been taken so far in Scotland. However, there may be some prospect of movement, with the Enterprise and Skills Strategic Board recommending the expansion of ITAs in key sectors to support a broader labour market response to disruption caused by COVID-19.

This report will explore the case for expanding and strengthening individual learning accounts (ILAs) in Scotland in response to new and existing threats, and identify lessons from iterations of individual learning accounts across the UK and internationally.

Scotland's skills system and COVID-19: disruption so far

New labour market challenges

Nine months on from the start of the COVID-19 pandemic, we are in a period of rising unemployment and stifled job creation. Prior to the extension of the UK Government's furlough scheme, unemployment was expected to rise significantly by the end of the year. Now, we face sustained uncertainty across multiple fronts: a second wave of infections has seen government support extended and restrictions ramped up across the UK – a return to normality seems far away. Meanwhile, progress on a number of vaccines suggests we may soon have a timeline for the more permanent reopening of parts of the economy that have been hardest hit. Regardless of the timescale, we are likely returning to a '90% economy' in which output remains below pre-COVID levels for some time to come.⁶ This has significant implications for how we work, and for how people across Scotland get into or progress in work.

Heading towards October 2020, the UK's employment outlook looked grim. We can expect some of this potential damage to be averted as a second wave of infections and subsequent lockdowns have pushed the UK Government to provide firms with continued support to stay afloat through the difficult winter months ahead, and find their feet before support is wound down in the spring. While this is good news on the whole, we can still expect significant long-term consequences from continued disruption to work. These will be particularly pronounced for those struggling to get into work – particularly young people leaving full-time education, or starting out in their careers – and in terms of skills acquisition and progression for those in work.

While the outlook for Scotland's workforce is still subject to considerable uncertainty, the longer the pandemic stretches on, the more strain employers across the country will be under. While the continuation of the UK Government's furlough scheme through a second wave is welcome, the impacts of what may be a full year of significant economic disruption will be felt for years to come. As stated above, this comes on top of two structural trends within Scotland's workforce: Scotland's population ageing at a faster rate than many other parts of the UK, and Brexit and the end of free movement each present unique challenges to Scotland's future workforce, particularly in the sectors that do not meet the salary or skills thresholds of a post-Brexit immigration system.⁷ Furthermore, we are likely to see automation and technological change as well as the priority to reach net-zero emissions add further disruptions to the way we live and work. This combination of forces elevates the role of Scotland's skills system in supporting workers and employers to navigate the disruption ahead.

Economic indicators so far suggest the UK labour market is already in stormy waters. Advertised vacancies dropped to a record low across the UK in April–June 2020,⁸ and analysis of labour market flows shows that firms across the country are not replacing staff who move on.⁹ Unemployment is forecast by the Office for Budget Responsibility to peak at 8.3% across the UK in the third quarter of 2021 in its central scenario, with a downside

scenario seeing unemployment surpassing 12%.¹⁰ In a labour market with high structural unemployment, the skills system is going to be called on to support those out of work to upskill and retrain in order to support transitions into new sectors and good-quality new jobs. The upside scenario, however – which assumes a rapid vaccine rollout in early 2021 and a smooth exit from the European Union – sees unemployment peak at a substantially lower rate of 5.1%.

As COVID-19 disruption continues, businesses, sectors, and whole local economies are continuing to work at reduced capacity. The scale of ongoing labour market disruption is underlined by the scale of demand for furlough support – which we know likely only shows a partial picture of the disruption experienced by workers and employers. Scottish government research suggests two-thirds of businesses in Scotland were still furloughing their workforce to some extent at the end of the summer, and the extension of the UK government furlough scheme was forecast to shore up some 61,000 jobs that would otherwise be lost.¹¹ While continued support will be vital to seeing families and businesses through this difficult COVID-19 winter, continued disruption is a growing concern for Scotland's labour market over the medium to long term – not least in terms of the impact of underemployment. For employees working reduced hours, or not at all, with or without the support of the furlough scheme, or self-employed people with less work due to continued disruption and depressed demand, the impact of a sustained period of underemployment will be significant. The skills system has a key role to play in ensuring that the potential scarring effects of time away from work are mitigated.

We also know these risks are concentrated in particular sectors, such as accommodation and food services, where more than one in three staff (34.4%) were still on furlough come September, rising to 57.5% of staff in the arts, entertainment and recreation sector. As two of Scotland's lowest-paying sectors, this raises particular concerns about the financial security of low-paid workers experiencing a prolonged pay cut, where they are able to access the furlough scheme, and heightened risk of job loss in a very difficult economic climate.¹²

As businesses continue to face supply-side constraints and depressed demand, there will be new challenges in encouraging employer contributions towards in-work learning or training. Should the pandemic and restrictions continue for some time, an environment of sustained uncertainty could pose additional challenges to employer investment. Making the case for investment to support upskilling for those in work, and retraining for those transitioning between jobs and into new careers, will be vital in the months ahead – even as the ongoing economic emergency encourages short-termist thinking.

New challenges to skills demand?

We also anticipate new challenges will affect demand for training and learning opportunities. For learners – and particularly those in work – COVID-19 disruption is likely to affect training incentives as time pressures are increased, work patterns disrupted, and learning moved online. The reality of life in a pandemic significantly alters incentives for workers, in particular, to take on learning or training. Parents and carers are under increased pressure from the disruption or withdrawal of schooling and care provision, adding to existing time pressures that can limit engagement with the skills system.¹³ More broadly, the ongoing disruption to workplaces and working patterns may mean workers are less likely to be focused on their career development over this period.

Employers, too, will face different incentives to invest in in-work training in an environment of sustained uncertainty. With profound economic uncertainty ahead and continued financial pressure for firms across Scotland's economy, the challenge for the skills system

is to develop offers that are practical and effective for learners and employers, through the COVID-19 crisis and the decade of disruption ahead.

In addition, there will be new challenges for skills utilisation as COVID-19 disruption continues. Furlough and the proliferation of short-time working practices mean many workplaces will be adjusting to cover a wider range of roles with fewer employees, creating new challenges for skills development and specialisation on one hand, and new opportunities for some staff on the other. As workplaces continue to adapt quickly to changing circumstances, skills provision needs to be agile and personalised in order to meet the varied needs of workers and their employers. Flexible tools to support a wider range of learning will be key.

New risks across Scotland's workforce?

The COVID-19 crisis has exposed and exacerbated existing inequalities and created new risks for particular groups in Scotland's workforce. In the face of ongoing labour market challenges, there will be difficult choices to make in the months ahead – particularly in deciding how to target support. While labour market disruption is likely to be widespread, there are specific threats to the prospects of young people in Scotland that are already unfolding and stand to reach far into the future. Looking back at previous recessions, evidence tells us that young people (aged 16–24) are particularly exposed to 'scarring effects' from falling out of employment, education, or training, which can harm their employment and earnings prospects far into their futures. With less employment experience to fall back on, young people are also often more likely to be let go and less likely to be hired during a recession.¹⁴

There are also particular risks to lower-skilled workers: evidence from previous recessions tells us that those young people with fewer qualifications are at risk of the more severe and longer-lasting scarring effects than their more qualified peers.¹⁵ These scarring effects can take the form of pay and employment gaps that can follow young people throughout their working lives. The UK Government has rolled out a £2 billion Kickstart Scheme aimed at supporting employers to create six-month-long employment opportunities for 16–24-year-olds. In September 2020, the Scottish Government announced a further £60 million of investment in a 'young person's guarantee' to ensure every young person can access a work, learning or training opportunity. The funding will go towards local employability support for young people, college places and apprenticeship pathways, and work with employers to create employment opportunities for young people. While this is a welcome first step, the scale of the challenge that likely stretches far into the next decade will require more action and greater imagination.

The nature of the COVID-19 crisis means there are also clear sector-specific risks to workers across Scotland. The worst affected sectors – particularly the accommodation and food service industry and the arts, entertainment and recreation sector – are characterised by low pay and a lack of progression opportunities. There are also concerns that sector-specific threats will compound existing inequalities, as workers in these sectors are disproportionately likely to be younger, and more likely to be women.¹⁶ Here, we may see a potent mix of long-standing structural inequalities colliding with new circumstantial threats, leaving workers most exposed to the COVID-19 crisis at risk of long-lasting damage to their employment prospects and financial security. Personalised skills provision could play an important role in buffering these strong currents that threaten to pull more people into poverty and insecurity.

In addition, there are also likely to be specific place-based dynamics that will shape the fallout from COVID-19. A blunt top-down approach alone will not be enough to shore up jobs and minimise the damage done to individual workers and Scotland's local workforces.

The sectoral mix of local economies and existing deprivation levels will no doubt affect how people are able to weather the storm, and personalised routes to upskilling and retraining could be crucial in supporting businesses and workers to adapt effectively.

Early evidence points to clear risks that COVID-19 disruption is already exacerbating existing inequalities. The IPPR's work has found black and minority ethnic workers have so far been disproportionately exposed to job loss and to getting into debt,¹⁷ and evidence from the IFS has pointed to disproportionate exposure to redundancies among women, who are taking on a disproportionate share of extra care and domestic work.¹⁸ In order to play their full part in tackling wider inequalities in access to education and in the labour market, ILAs will need to be targeted and include in their design an explicit focus on lowering barriers to learning, be they financial or in terms of time and flexibility.

Future-proofing skills provision against a decade of disruption

Over the next decade, Scotland's skills system could be at the centre of how Scotland can anticipate and respond to the multiple challenges and transitions faced over the coming decade. Even before COVID-19, both were on the cusp of significant changes in the face of the combined impacts of automation and technological change and an ageing population, Brexit, and attempts to deliver a just transition to a net-zero economy. As Scotland rebuilds from COVID-19, these challenges remain. Any vision for Scotland's skills system must be future-proofed to rise to the challenge of delivering a skills system that can support people and businesses to rebuild following COVID-19 in a way that responds to the decade of disruption we already faced. Rising to this challenge could carry significant dividends, driving productivity and boosting economic growth, and bringing new opportunities for individuals and employers. But there are also big risks. As jobs are reshaped by new technology, people who do not have the right skills risk being unable to obtain secure, well-paying work or even being pushed out of the labour market altogether. The skills system must be at the heart of readying our societies to seize these new opportunities successfully and mitigate the risks.

The decade ahead will be characterised by disruption: from COVID-19 and its longer-term ramifications, and from transitions that have already begun. These include:

- **Automation and technological change:** as advancing technologies change how we work and the type of work people do, the skills system must be prepared to respond to change and disruption. Most commonly this will see workers need to acquire new skills to work with and alongside new technologies, but in some cases job roles may be displaced and the skills system will need to play a key role in providing retraining opportunities so that displaced workers can adapt and access the good, new jobs of the future.
- **Brexit:** implications for trade and migration as a result of Brexit will see new challenges for industries, workforces and employers across Scotland. This could see a significant workforce challenge for industries currently reliant on migrant labour, which could lead to skills shortages.
- **Climate and nature crisis:** the urgent need to decarbonise major industries across Scotland will put new demands on Scotland's skills systems, as whole sections of the workforce may need support to transition into new or altered job roles. This may include those entering green new jobs in areas like retrofitting houses for energy efficiency, and those exiting roles in the traditional oil and gas sector or transitioning to new areas such as wind energy.
- **Demographic change:** Scotland's ageing population also presents new pressures for the skills system. As Scotland grows older, people are more likely to be working longer, with multiple employers and in multiple careers. As a result, we can expect growing demand

for opportunities for adult learners to retrain or upskill throughout the course of their working lives. This will be all the more important as fiscal pressure on the working-age population increases.

- **Existing inequalities:** there is considerable work to be done to tackle existing inequalities in Scotland's skills system, and across Scotland's labour market. This includes structural inequalities along lines of gender, ethnicity and disability, and the interactions between them.

The future world of skills will be very different from the world we have known pre-COVID-19. There is an urgent need to future-proof Scotland's skills system against a decade of disruption ahead. The adaptability of individual learning accounts could be a valuable tool to support Scotland's workforce through the COVID-19 recovery and through these transitions that reach far into the future.

A future-proofed skills system for Scotland will require a broader set of reforms to prepare for these transitions. This should include a shift towards more modular and bite-sized learning that is based on skills as much as qualifications and more online provision, as well as greater flexibility and responsive curricula that can respond at pace as change occurs quickly in the economy and wider society. It will also require a greater focus on in-work learning and a sustained focus on generating a culture of lifelong learning that facilitates continued engagement with the skills system throughout adults' working lives. This will also demand a greater focus on career pathways and careers advice, as longer working lives and more varied work trajectories create a greater need for guidance beyond advice traditionally offered at the point of leaving full-time education.

3 ILAs: what works?

Individual learning or training accounts are a policy tool designed to increase engagement in learning or the skills system among adults. Some schemes have been targeted at lower-qualified adults, but others are designed as open to all. ILA schemes are characterised by state contributions towards individual learning, that is most often directed by the learner, and delivered by a mix of providers depending on the scheme's design. International reviews of ILAs have emphasised the importance of a range of design features in ensuring schemes deliver against various potential outcomes. Here, we explore the various iterations of ILA schemes across the UK and internationally to learn key lessons on what works.

ILAs in Scotland, England and Wales

Individual learning or training accounts have been a feature of the UK skills landscape for over two decades, though their form and purpose has varied considerably. In 1997, Individual Learning Accounts were announced in the manifesto of the UK Labour Party as a measure to encourage people *'to invest in and take responsibility for their learning throughout their working lives'* and later enacted in England in 2000 following Labour's general election victory.¹⁹ These were funded by government-subsidised discounts on eligible learning, through which a government contribution of £150 was paid for each individual eligible for the scheme for the first million learners. After that point, the scheme subsidised 20% of training fees up to £100, or 80% up to £200 where learning was on basic IT or maths. An initial cap was set at £500, and then lowered to £200.²⁰ Learners were not subject to eligibility checks, but learning providers were subject to some accreditation checks; the scheme was aimed at *'widening participation in learning'* and *'lowering financial barriers faced by learners'*, with a focus on less qualified participants.²¹

The offer was targeted towards young people aged 19–30 with low qualifications, self-employed people, women returners to work, non-professional school staff, and ethnic minorities. The scheme attracted far more interest than expected, with some 2.6 million learner accounts opened and an expenditure of £273 million, against a budget of £199 million. The scheme was largely taken up by learners interested in gaining IT skills in the early years of the internet, with 65% of take-up IT-related, and over half of learning booked was for entry-level skills or level 1 qualifications.²² Weaknesses in the system meant the scheme was subject to significant fraud and it was quickly closed in November 2001.²³

Since then, an alternative scheme has not been implemented in England, though the Liberal Democrat manifesto offer of a ‘skills wallet’ resurfaced a similar idea at the 2019 UK general election. Meanwhile, devolved governments in Wales and Scotland have implemented their own individual learning accounts.

In Wales, the Welsh Government’s Working Wales programme includes a personal learning account, launched in 2019, which is open to anyone working and living in Wales, aged 19 or over, who is earning under £26,000 a year (median income), is on a zero-hours contract, is agency staff, is on furlough, is working in a sector particularly affected, such as hospitality, or who is at risk of redundancy.²⁴ The scheme is notable for its rapid evolution to meet the new labour market challenges related to COVID-19. The scheme is focused on skills provision in ‘priority sectors’ facing skills shortages, such as engineering, construction and ICT, and training is available through accredited college providers. The scheme covers the full cost of qualifications for learners on accredited courses.

The Scottish Government operated an individual learning account (ILA) from 2004 until 2017, when the scheme was replaced with an individual training account (ITA). Scottish government analysis of uptake of the ILA scheme during its first three years finds that 72% of learners taking up the scheme were female, with 36–45-year-olds most likely to make use of the scheme.²⁵ Eighty-one per cent of ILA learners taking up the ‘ILA 100’ offer, which launched in 2005 and was not income-restricted, were in full-time work, with 40% in mid-level occupational roles.²⁶ The ITA scheme was designed to refocus the tool *‘to better meet the demands of the jobs market’*.²⁷ The new scheme is focused on people in work earning under £22,000 or in receipt of Universal Credit or equivalent means-tested benefits. The scheme offers £200 towards a training course for learners, and is targeted at meeting labour market skills demand. To do so, all ITA courses must be in one of the curriculum areas aligned to the Scottish Government’s Labour Market Strategy. This includes: agriculture, business, construction, early years and childcare, health and safety, STEM, social care and transport.²⁸ The Scotland scheme has been praised for its simplicity, and for its well-designed and easy-to-navigate website.²⁹ The value of the scheme, however, has stayed consistent since its first iteration in 2004, and 16 years later is not tied to rising costs.

ITAs in Scotland: who do they work for?

Since October 2017, ITAs in Scotland have been taken up by some 46,857 learners in Scotland. Skills Development Scotland data on take-up shows ITAs in their current form have disproportionately benefited younger learners, those out of work, learners in the city of Glasgow and Scotland’s construction sector. There is clearly more work to be done to foster a lifelong learning culture across Scotland through individual learning accounts, and to ensure opportunities to retrain or progress in work are shared across Scotland’s workforce and economy to maximum benefit.

Table 1: Only 45% of current ITA users in Scotland are in work

Employment status at point of application (as defined by applicant)	Count	Percentage (%)
Employed	18,743	40.00
Nil income	5,743	12.26
Not employed	368	0.79
On benefits	17,517	37.38
Other	2,191	4.68
Self-employed	2,295	4.90
Total	46,857	100.00

Source: Skills Development Scotland (2020) (data shows update from October 2017–20).³⁰

Table 1 shows the self-defined employment status of ITA applicants. Just 45% of applicants identify themselves as being employed or self-employed, suggesting a skew towards those out of work. This raises questions regarding the purpose of ITAs for upskilling those in work, retraining those out of work, or a combination of the two, as well as how ITAs interact with wider skills and employment support systems. These are revisited later in this report.

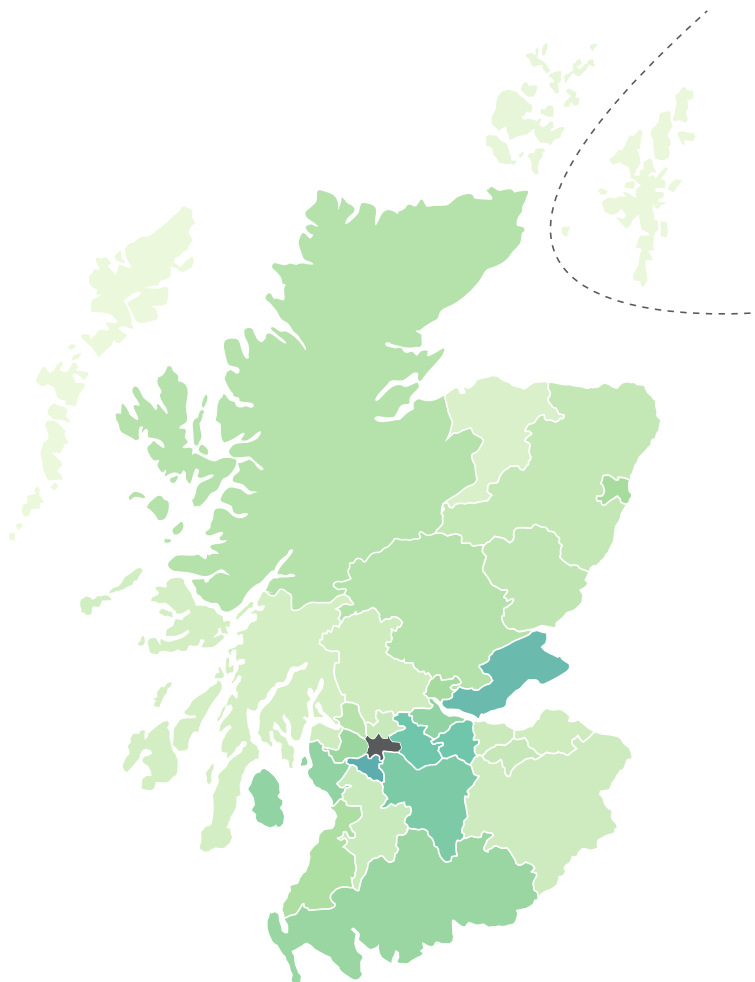
Table 2: ITA take-up is skewed towards younger learners

Age group	Count	Percentage (%)
16–25	12,158	25.95
26–35	13,799	29.45
36–45	9,453	20.17
46–55	7,418	15.83
56–65	3,657	7.80
66 and over	372	0.79
Total	46,857	100.00

Source: Skills Development Scotland (2020) (data shows update from October 2017–20).³¹

Table 2 shows that ITA take-up is currently skewed towards younger learners, with some 56% of learners aged 16–35. While this may point to a trend of ITAs supporting young workers to get into or progress in work, lower take-up rates among older workers – and particularly over-45s – suggests ITAs are not yet fulfilling their potential as a tool to support learners throughout their lengthening working lives.

Figure 1: ITA take-up is concentrated in Glasgow City and across central Scotland



Note: Darker colour indicates greater concentration of ITA take-up.

Source: IPPR Scotland analysis of Skills Development Scotland (2020) data from October 2017-20.
Created using Datawrapper.

As Figure 1 demonstrates, ITA take-up is currently concentrated within Scotland's centre. Take-up is considerably higher in Glasgow City, where 17.13% of ITA take-up is concentrated, as compared with any other local authority, followed by City of Edinburgh (7.66%) and Fife (6.69%). There is still clearly much work to be done to level the playing field on access to ITAs, particularly in more rural parts of Scotland.

If we look at what courses or qualifications ITA learners are pursuing, we see a significant skew towards construction, which boasts 29.37% of take-up. This is followed by fitness, health and beauty (11.57%) and transport (9.41%).

Table 3: ITA take-up by curriculum area

Curriculum	Count	Percentage (%)
Construction	13,760	29.37
Fitness, health and beauty	5,423	11.57
Transport	4,410	9.41
Health and safety	3,696	7.89
Hospitality	3,601	7.69
Security	3,544	7.56
Social care	2,971	6.34
IT	2,529	5.40
Business	2,292	4.89
Early years and childcare	2,013	4.30
Language	1,548	3.30
Adult literacy and numeracy	661	1.41
Agriculture	286	0.61
Not classified	123	0.26
Total	46,857	100.00

Source: Skills Development Scotland (2020) (data shows update from October 2017-20).³²

Growing sectors such as social care enjoy only a 6.34% share of take-up, while hospitality – a large, low-wage employment sector characterised by a lack of progression opportunities – benefits from just 7.69% of ITA take-up.

International examples

More recent international examples of individual learning accounts offer important lessons for other skills systems. Table 4 outlines the key features of individual learning account offers in France, Singapore, Canada and Scotland.

Table 4: Overview of individual learning account case studies

Country	Scheme	How does it work?	How is it funded?	Who is eligible?
France	Compte Personnel de Formation (CPF)	Learners accumulate training rights over time, in the form of training funding. Individuals with a lower secondary degree accumulate 500 euro per year, capped at 5,000 euro. Less qualified individuals are credited 800 euro per year, capped at 8,000 euro.	Government contribution funded by 1% training levy on payroll taxes. Self-employed contribute 0.2% of turnover to a training fund. Possible contributions from Pôle Emploi or regions for jobseekers, and from employers or training funds for employees.	Employees, self-employed, jobseekers

Singapore	Skills Future Credit (introduced 2016)	A one-off payment of 500 SGD (ca. £280) is made into a skills account for all Singaporeans aged 25 and over, with an extra 500 SGD top-up for all 40–60-year-olds.	National government funding of 500 SGD + periodic top-ups; can be claimed alongside other sources of funding.	All
Canada	Training Credit (introduced 2020)	Canadian workers can accumulate a credit balance of \$250 per year when filing their income taxes, up to a lifetime limit of \$5,000. Balance can be claimed against training fees at colleges, universities and other eligible training providers.	Federal government funding claimed through income tax credits.	Workers aged 25–64, earning between \$10,000 (including parental leave benefits) and \$150,000
Wales	Personal Learning Account	Working Wales covers the cost of accredited qualifications in sectors facing specific skills shortages.	Funding covers full fee costs for learners.	Workers earning under median salary (£26,000), on furlough, on a zero-hours contract or in agency work, at risk of being made redundant, and workers in sectors ‘negatively impacted by the economy’
Scotland	Individual Training Account (introduced 2017)	£200 training fees covered by Scottish Government; targeted at sectors prioritised in Scotland’s Labour Market Strategy.	Scottish government funding, cannot be claimed in conjunction with other funding.	Employees or self-employed workers earning less than £22,000 per year, jobseekers looking to get back into work

Sources: OECD (2019),³³ Government of Canada (2019).³⁴

ILA models: what works? Country case studies

France’s Compte Personnel de Formation (CPF) is identified as an effective model to support progression through work and learning for a range of users. Every member of France’s economically active population is entitled to an account through a universal right model, and rights to training are regardless of employment status, and are retained as workers change or lose their job. Training funded by the scheme must lead towards national diplomas, or certifications chosen by sectoral partners. Despite being widely open, take-up of the scheme has been disappointing – which is discussed in more detail below. The scheme is undergoing major reviews in 2020.

Singapore's SkillsFuture Credit offers a drastically different universalist model that is open to all and primarily aims to create a culture of lifelong learning across the population. The scheme is explicitly aimed at driving behaviour change, with take-up of both vocational and leisure courses encouraged.³⁵ The open nature of the Singapore scheme has led to relatively high levels of take-up, and the learner-led direction that positions ILAs as a flexible tool, rather than a direct instrument responding to skills demand, appears to have made a difference to mid-career learners. The scheme is most popular among over-40s looking to upgrade their IT skills,³⁶ with other popular courses including cooking classes and health and safety qualifications.³⁷ Singapore has also been recognised for its success in coupling education and training policies with economic development policy for some time.³⁸ In 2016, the Singapore Government convened a Committee of the Future Economy that was tasked with developing economic policy strategy for the next decade – with a focus on developing skills (including a focus on digital skills) and on lifelong learning.

Canada's newly established Training Credit is an interesting example of a buildable scheme, in which Canadians aged 25–64 accumulate training credit year-on-year. The design of the Canadian scheme is a strong example of a holistic approach to an individual learning account, with the take-up of training credit entitlements supported by a new Employment Insurance Training Support Benefit and new leave provisions. The training support benefit is designed to provide workers with up to four weeks of income support, provided through Canada's employment insurance system, to support workers on training leave to cover their expenses. The scheme is also supported by an Employment Insurance Small Business Premium Rebate to offset the pressure of the employer premium rate for small businesses associated with the new training support benefit. New leave provisions protect workers' right to take time away from work to pursue training, ensuring they have support to take time away from the workplace for training, and a job to return to on completion.³⁹

Table 5: Learning account models

Variations of learning accounts

- **Individual learning accounts:** virtual accounts in which training rights are accumulated over time, for example the French Compte Personnel scheme.
- **Individual savings accounts for training:** real accounts in which individuals accumulate resources that can be spent on training, for example the Liberal Democrats' 'skills wallets' proposal.
- **Training vouchers:** provide individuals with direct subsidies for training, often with co-financing from the individual learner, for example the 2003 UK government scheme aimed at upskilling domestic heating engineers to install and maintain renewable heating systems.

Source: modified from OECD (2019),⁴⁰ UK Government (2003).⁴¹

What benefits do individual learning or training accounts offer?

Individual learning accounts offer a route to increased investment in the adult skills system alongside increased impact associated with self-directed learning.⁴² ILAs can also be structured in such a way as to **share training costs** among a range of partners, including learners, employers, and government. This shared approach can be extended out into a social partnership model that can shape provision, as seen in Belgium (more on that below), and connect ILAs into broader labour market objectives by responding to skills shortages and delivering positive employment outcomes.

A major strength of individual learning accounts lies in the **flexibility** that is an in-built feature of a demand-driven model. Eligible learners can typically access a wide range of training opportunities across a range of accredited providers and can take a self-directed approach to learning.

A major advantage of individual learning or training accounts is their capacity to create and **support a culture of lifelong learning** through learner-led direction built into schemes' design. By opening up opportunities for users to take up learning or training of their choice, schemes support new forms of engagement with the skills systems, potentially across broad population groups. They do this by supporting increased engagement, improving learner motivation, and encouraging personal development through learning for those in work.

The learner-directed nature of individual learning accounts can also support wider efforts to ensure skills providers are responsive to learners' needs. Since their inception, ILAs have become something of a symbol of a **demand-led approach** to skills provision that is associated with more innovative and more responsive forms of skills provision.⁴³ In the current Scotland context, this might link directly to calls from the Scottish Funding Council for provision of bite-sized learning and accreditation.⁴⁴

ILA schemes can also provide a unique blend of **quality-assured, learner-directed provision** where schemes include effective accreditation criteria for skills providers: combining greater choice for learners with a focus on high-quality opportunities that can support learners to get into, stay on in, and progress in good-quality work.

4 Challenges and trade-offs in ILA design

Individual learning or training accounts already take many different forms. The divergent designs of schemes across different countries and contexts underlines some of the key challenges and potential trade-offs policy-makers should be cognisant of in considering a scheme's design. This section outlines some of those trade-offs, and highlights where particular schemes have taken different approaches or delivered distinct outcomes.

Take-up is, in itself, a key challenge in designing ILAs. Despite the widely praised design of the French CPF scheme, **take-up** has proven a stubborn challenge. In 2019, only 7% of workers surveyed had benefited from training using the scheme, while around 30% had opened a CPF account.⁴⁵ The scheme is currently being overhauled, with reforms likely to take aim at boosting take-up. In Singapore, the universal scheme was taken up by some 192,000 learners in the last fiscal year – equivalent to around 8% of the eligible population.⁴⁶

Where the UK individual learning account scheme fell down was in **quality control** mechanisms to prevent rogue actors from accessing allocated funds. Without these, schemes are potentially open to fraud, as per the UK government scheme in the early 2000s, and crucially, learning and training opportunities may not be of sufficient quality to deliver improved labour market outcomes or open doors into new areas of work for learners. Here, schemes have sought to establish accreditation processes for training providers, which have often included a focus on the college sector.

The design of individual learning or training accounts in Scotland and Wales has sought to respond to the challenge of a **demand and supply skills mismatch** – whereby learner-

directed investment in skills supply is at odds with skills shortages experienced by employers. Flanders' Individuele beroepsopleiding in de onderneming, or IBO (Individual Training in Enterprise), scheme is explicitly designed to counter skills mismatch, with skills opportunities targeted at the unemployed and brokered between the Flemish public employment service, a specific business, and the jobseeker. Training can last between 4 and 24 weeks, and is designed to lead to a specific job vacancy.⁴⁷ This design highlights the value of a social partnership model designed to match the needs of employers and jobseekers, and in doing so to support transitions into work. In light of the labour market disruption anticipated over the next decade from pre-standing transitions and COVID-19, matching skills supply and demand will be key to unlocking a sustainable recovery for Scotland built on good jobs, not any job.

This social partnership model offers one solution to the sizeable challenge of **employer engagement**, and potential tensions resulting from a learning account model where learner-directed retraining or upskilling is not perceived to be in the employers' direct interests. This tension presents something of a trade-off for ILA designs to consider. At one end of the scale, a Singapore-style approach is open to all, but may not effectively respond to skills shortage or mismatch. At the other, the Flanders model offers to effectively match jobseekers to specific opportunities to undertake the particular learning needed to transition into a particular job, with a particular employer – but may not enable workers to pursue transformative learning opportunities, and may not shift behaviours or levels of engagement with the skills system overall. This quandary represents a challenge to funding models that rely heavily on employer contributions, which may limit the breadth of provision supported by the scheme, the diversity of learners, or take-up.

The design of individual learning accounts can include **targeting** of particular groups. The OECD's 2019 review emphasises that targeting can '*prevent deadweight loss and increase participation among the low-skilled*', pointing to evidence that take-up across schemes has seen higher-skilled workers over-represented.⁴⁸ This is a particularly pronounced challenge in the case of France, whose CPF scheme suffers from a significantly wider participation gap between blue- and white-collar workers than other training schemes.⁴⁹ In 2016, the CPF participation rate among employees in managerial/professional occupations was three times as high as that of blue-collar workers, and twice as high as low-qualified white-collar workers.⁵⁰ In Flanders' equivalent scheme, almost half of employees pre-2015 were already highly educated workers. The scheme has since been reformed to target employees with low- or mid-level qualifications.⁵¹ This restriction goes a step further in embracing targeting, compared with France's model of tiered entitlement to training rights. Targeting does, however, come at the cost of simplicity: additional eligibility criteria can act as a barrier to take-up.

Individual learning accounts also vary in the level of **generosity** of funding attached to schemes. The 2019 OECD comparative study of individual learning accounts finds that examples of schemes in practice through the 2000s and 2010s were often characterised by relatively low levels of funding. This is assessed to have held schemes back, as it often meant that in practice learners have only been able to access short-duration training programmes – as is the case under the design of the current ITA scheme in Scotland – which are less likely to have a transformative effect on their employment prospects over the short or longer term.⁵²

Finally, the design of the individual learning account is shaped by their compatibility and **interaction with other parts of the skills system**, including additional sources of funding. The current Scotland scheme is characterised by a limitation in that it forbids

access to other forms of government funding. This is perhaps short-sighted where it prohibits learners from embarking on longer-term training due to the associated costs. The Singapore model, by contrast, supports matching in other types of government support – meaning that, in practice, the scheme is much more generous. The France model enables learners to request ‘complementary’ funding from employers, regional training funds, or Pôle Emploi (employment centre) – a feature with particularly high take-up.

5 ILAs in broader context: conclusions

Through the ongoing disruption associated with COVID-19 and into a post-pandemic world, ILAs offer particular strengths to learners, employers and skills providers across Scotland. As we look ahead and envisage a skills system fit for the challenges Scotland will face through the 2020s, ILAs offer flexibility and individualisation that enables them to be valuable and adaptable tools to support learners throughout their working lives, and through challenges from multiple fronts: be it as a tool to support early-career progression, as an opportunity to learn to work with new technologies, or as a means of accessing retraining that can support a smooth transition from high- to low-carbon industries.

ILAs have potential to boost demand for skills provision across Scotland by creating accessible, personalised opportunities for people to learn and train in a way that suits them. They also have potential to boost skills utilisation, by opening up routes for learners of all ages and stages to upskill or reskill in areas experiencing skills shortages, and in line with broader labour market strategy that can support more people into good-quality jobs with decent pay and conditions. Indeed, a July 2020 report from a subgroup of the Scottish Government’s Enterprise and Skills Strategic Board recommends that ITAs are expanded immediately for key sectors.⁵³ ILAs have potential to connect employers to useful and flexible opportunities to support their staff to take up training or learning opportunities that work for staff and stand to benefit their business – supporting progression and productivity. An enhanced ILA offer could be complementary to the Scottish Government’s efforts to support people facing redundancy and unemployment to retrain, including through provision offered by the National Transition Training Fund.⁵⁴

Provision will need to be mindful of other persistent barriers that prevent people across Scotland from participating in the skills system. Barriers most often come in the form of time or money, particularly where people cannot attach the value of learning to their personal goals.⁵⁵ Here, the personalisation available through individual learning accounts is key to their success as a route into lifelong learning. Their design must, however, be cognisant of the practical reality of these barriers: from a lack of information about learning opportunities to the time-intensive demands of childcare and other caring responsibilities, ILAs will need to be supported by an effective infrastructure to support learning.

Parallel measures could boost ILAs’ potential impact by ensuring accessible routes in for low-income workers, measures to support employer buy-in and co-operation, and targeted routes for particular groups who stand to make the largest benefits from learning opportunities, or who face particular barriers to engaging with the skills system.

Maximising the potential of ILAs will also require supply-side reforms. There is a clear need for innovation to support the delivery of COVID-secure learning across skills providers as fully as possible to protect students and staff, and to minimise the disruption of COVID-19

on learning now and any damage caused by loss of learning or learning opportunities. Now is the time for change that meets the long-standing need for flexible learning provision, to meet the realities of learners' lives and the challenges of the times we're living in. This should include flexibility in how provision is designed, not just in delivery: skills providers should be considering how they can deliver micro-credentials and bite-sized learning, as recommended by the Scottish Funding Council's recent review of the college and university sector.⁵⁶ ILAs have potential to support further recommendations made in this report, including by supporting learners on a path through college and onto university.

It is clear, too, that ILAs could be better supported by a system of integrated support. This could take the form of jobs brokerage schemes that support progression for in-work learners, offer routes into new industries for those retraining, or first steps into a career for young people setting out in their working lives or looking for opportunities to utilise and develop their skills. Careers guidance, as seen in the design of the Wales scheme, would further support ILAs to reach their potential across a wide range of learners, settings and points in a person's learning and working life.

A clear challenge for the design of any ILA in Scotland to meet is that of employer buy-in. Incentives for employers will be critical to the success of an ILA scheme that goes some way to bridging the gap in mid-career learning, and genuinely supports progression across Scotland's workforce. There is a particular challenge facing SMEs, who may be under particular or additional pressures due to COVID-19 uncertainty, and for whom investment in skills is unlikely to be a self-evident priority in the months ahead. For SMEs across Scotland, effective incentivisation could unlock potential to boost productivity, strengthen progression, and drive innovation across their workplaces.

Any ILA scheme will need to provide realistic and accessible routes for self-employed workers, including those in low-paid self-employment, and for employees in precarious work. This means schemes will need to be multi-faceted and adaptable, and include tested access routes for target groups of workers.

Finally, with the realities of COVID-19's impacts on Scotland's labour market unfolding, and a decade of disruption that will change the future world of work ahead, the design of ILAs will need to consider a sectoral approach to matching skills demand and supply across Scotland. This could include sectoral skills partnerships, whereby key stakeholders representing workers, learners, employers and skills providers come together with the Scottish Government to develop sectoral strategies that support learners and workers to acquire particular skills that support in-work progression and strengthen Scotland's workforce as a whole.

6 Recommendations

While ILAs potentially have an important role to play in a twenty-first-century skills system that is resilient to the decade of transition ahead, they are clearly not a silver bullet. In assessing the relative strengths and weaknesses of ILAs, we can see that in iterations delivered so far, they have been most effective as a tool for stimulating demand for lifelong learning among working-age adults over 25 – and in doing so extending or reigniting engagement with the skills system. To be maximally effective, however, they will need to be combined with supply-side reform, effective quality assurance mechanisms, and made fully compatible with other forms of support that can support learners to embark on and progress on a learning journey that continues throughout their working lives.

Lessons from iterations of individual learning accounts seen so far in Scotland and other parts of the UK tell us that the level of funding attached to ILAs and the design of learning offers are often not well constructed to maximise impact. While a focus on tuition costs will undoubtedly lower a crucial barrier for some, there are other persistent financial barriers that we know prevent engagement with the skills system.⁵⁷ Increasingly, too, online provision works differently from in-person learning – and may indeed attract a different cohort of learners, with different ambitions and expectations. In this section, we outline a range of potential policy options for the Scottish Government to consider in relation to individual learning accounts.

1 ILA reform should be part of a package of wider reform of Scotland's skills system

The Scottish Government should reform ILAs as part of a wider package of reforms to skills in Scotland. This should include promoting greater use of online learning, flexible provision, bite-sized learning, and quality-assured provision. These supply-side reforms could remove a number of barriers to entering the skills system for smaller employers, self-employed, and workers, and particularly workers working part-time, or with other unpaid roles and caring responsibilities. As in Canada and Singapore, funding should be placed within broader reform, and new clear career pathways where learning and work experience combine to deliver career progression.

2 ILAs should be buildable, with greater value and 'use it or lose it' funding

Skills Development Scotland should develop an enhanced ILA offer, increasing the funding available for in-work learners from £200 to £500, and introduce a buildable funding model similar to France's ILA offer with funding accumulated up to an agreed cap (which could potentially vary across more- and less-qualified workers). This would provide added incentive to use or lose funding and allow the scale of ILA impact to increase by unlocking more value.

3 The Scottish Government should consider how best to incentivise employer top-ups to ILAs

The Scottish Government should consider how to use business support – including tax allowances and bonuses – to incentivise employer contribution towards ILAs. Given the current volume of business support spending in Scotland, and the number of pre-COVID-19 policy levers aimed at supporting businesses, some form of business support could be provided as a skills credit to top up reformed ILAs for workers experiencing short-time working or furlough. Over the medium term, the Government could look to do likewise with ongoing business bonuses and support (such as a small business bonus). This need not reduce the level of support on offer but would exist on top. Over time, as businesses recover, credits could move from 100% government funded to matched funding in order to top up an employee's ILA.

4 ILAs should be supported – where possible – by employer buy-in

Employer buy-in will be key to realising the potential for ILAs to unlock in-work progression. The Scottish Government should consider routes to encourage employer buy-in to employees taking up education or training through an ILA. One such route could be unlocking an enhanced ILA where a progression agreement is in place between an employer and an employee, where there is an agreed plan to utilise learning and a clear progression route outlined. The Scottish Government should consider greater incentives to encourage employer buy-in in low-wage, low-progression sectors.

Where learning can be linked to tangible job opportunities, or potential ones, ILAs can have a role in unlocking learning that can bridge workers from contracting sectors, or

unemployment, to new opportunities. Linking with PACE, employability support and (improved) DWP services could be crucial to their success.

5 ILAs would be best supported through career pathways and sector-level buy-in

ILAs would be best supported by integration on a career pathway: where learners and current or future employers have an agreed plan of learning to be utilised in work to support development and progression. The Scottish Government should consider how to ensure ILAs are supported by career pathways and, where appropriate, by sector-level buy-in. Other countries that have a social partnership approach across their economies see skills provision as an intervention best designed through a social partnership model. Level of provision, investment, structure of provision and quality assurance structures are decided in partnership between employers, workers and government, sector by sector. This could increase buy-in from employers and over time lead to greater demand and utilisation of skills, and greater employer investment in skills. Sectoral flexibility on the level of funding attached to an ILA, who can access them, and for what ends, could be worth exploring in a Scotland context. This could include a sectoral approach to establishing career pathways supported by ILAs, varying ILA generosity across sectors to meet need, or increased employer contributions for sectors with an identified skills shortage.

6 ILAs should be supported by action to boost learner retention and course completion

To maximise the value of ILAs in supporting progression in work, the Scottish Government should consider how best to boost learner retention and incentivise course completion. Learner demand could be supported by retention or outcome awards to encourage completion of courses – particularly in the context of MOOCs or online courses. This could be crucial to ensuring ILA learners realise their potential of learning opportunities in the context of COVID-secure learning. Providing a small reward or bonus on successful completion, alongside help towards tuition costs, especially where tuition costs are not the only barrier to undertaking skills acquisition, could improve engagement and completion rates, and in doing so support ILA-supported progression in work.

7 Additional support for living costs should be provided

Some ILA recipients will need help with living costs or income replacement (where they are working less) in order to take up an ILA. The Scottish Government should consider what support can be offered to improve take-up, particularly among low-income self-employed and insecure workers. Support could be delivered through UK-wide reform of the Universal Credit Work Requirements (allowing people to train while they claim), consideration of extending student support where needed, or indeed using devolved tax or social security powers to provide income replacement for these learners.

8 ILAs should focus on responding to learner need rather than economic need alone

The Scottish Government should consider which learners stand to benefit most from an ILA offer, and target support at these groups. An enhanced ILA offer could be focused on population groups (those facing particular barriers to getting into and getting on in work, such as lone parents, disabled workers), geographical areas (enhanced ILAs for rural areas given their unique challenges), or to sectors (those contracting sharply). This could be combined with a focus on priority sectors. ILAs cannot, however, take on the heavy lifting of retraining in the face of unemployment, and will be best used as

a proactive tool to support people to progress in work, or routes into specific roles or sectors. Here, the flexibility offered by an ILA and measures to support learners onto a career pathway will be key to success, and to developing a culture of lifelong learning across Scotland.

9 ILAs should be MOOC/online learning friendly

The Scottish Government should consider how best to ensure ILAs are more online/MOOC friendly, while learning lessons from previous UK government schemes to avoid large-scale fraud. Options include facilitating the payment of learning or training fees at accreditation points (where they exist) and restricting scheme support to quality-assured or kite-marked provision.

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