

ETF POLICY BRIEFING

EVIDENCE, PRACTICE & ADVICE FOR POLICY MAKERS



MANAGING REFORM CONGESTION IN SKILLS SYSTEMS

**A framework for prioritising, sequencing
and implementing complex lifelong
learning reforms**

This report has been prepared by the European Training Foundation.

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Executive summary

Many skills systems are overloaded with partially connected reform initiatives. New strategies, institutional reforms, donor programmes, pilot projects and policy instruments are often introduced faster than administrations and stakeholders can absorb, coordinate and implement effectively.

This briefing defines reform congestion as a condition in which the number, pace and interdependence of reforms exceed the capacity of a system to prioritise, sequence, coordinate, finance, implement and learn from them. Congestion may begin at the strategic planning stage, when priorities multiply without a clear hierarchy, allocation of responsibilities, budgets or delivery arrangements. Reform congestion is therefore not simply a matter of having ‘too many reforms’. It is a governance and implementation problem caused by a mismatch between reform ambition and system capacity.

The briefing proposes a practical response: manage reforms as a portfolio rather than as a list of projects. This requires a clear reform architecture, transparent prioritisation, sequencing based on dependencies and readiness, coordinated financing, institutional accountability, stakeholder ownership and effective implementation monitoring. A simple traffic-light diagnostic helps identify where congestion is emerging.

Brief examples from Egypt, Morocco and Tunisia illustrate different forms of the challenge: the rapid expansion of interconnected reform measures; innovation that is not yet fully integrated into lifelong learning pathways; and strong strategies affected by discontinuity and difficulties in scaling successful pilot projects. The briefing also considers how a lifelong learning perspective can help organise responses to digitalisation and artificial intelligence, the green transition, micro-credentials, upskilling and reskilling around shared system functions, rather than creating a separate layer of reform for each emerging priority.

Audience and use. This policy briefing is intended primarily for senior policymakers and officials responsible for designing, coordinating, financing and implementing skills reforms. It is also relevant to social partners and international organisations supporting national reform agendas. The national authority responsible for the overall skills strategy or reform portfolio should convene the diagnostic exercise, using an existing cross-government coordination mechanism wherever possible. Line ministries, planning and finance authorities, implementation agencies, education and training providers, and social partners should participate. International partners should support, rather than lead, the process.

1. Why reform congestion matters now

Skills reforms have expanded in scope. Governments are simultaneously expected to modernise technical and vocational education and training (TVET), strengthen basic and digital skills, build lifelong learning (LLL) systems, and improve labour market intelligence. Their agendas also cover the green transition, flexible qualifications, work-based learning, changing patterns of migration and demography, and artificial intelligence. The Union of Skills also links competitiveness and resilience to high-quality education, training and lifelong learning (European Commission, 2025).

This wider agenda makes strategic planning and implementation more demanding. Technical quality at the level of individual

reforms does not guarantee a coherent portfolio. Several initiatives may rely on a limited pool of officials, providers, social partners and data systems. Funding and reporting may follow separate channels and cycles. New structures may overlap. The result is more activity spread across limited implementation capacity.

Skills systems are especially prone to congestion because responsibility is divided among many institutions. These include ministries covering education, labour, the economy, finance and individual sectors, as well as qualifications and quality assurance bodies, public employment services, providers, employers, social partners, civil society, regional authorities and international partners.

Lifelong learning extends governance beyond formal education to flexible pathways, continuing training, recognition of prior learning and individualised support. Effective reform design and implementation therefore require coordination across the system.

The central policy challenge is to preserve ambition by aligning the scale and pace of reform with the system's capacity to deliver.

Scope and basis. This conceptual policy briefing draws on ETF country assessments and field experience, with reference to selected international literature. It presents no new comparative dataset and does not provide comprehensive assessments of individual countries. The country examples illustrate different forms of reform congestion. The framework will need to be adapted to each country's institutional and political context.

2. A working concept of reform congestion

This briefing proposes the following working definition:

Reform congestion arises when the combined scale and pace of interdependent reforms exceed the capacity of institutions and stakeholders to set priorities and manage the reform process effectively, from strategic planning and design through financing, coordination, implementation and learning.

The concept supports continued reform and ambitions policy goals, with room for experimentation and international cooperation. Applying it means treating reforms as an interdependent portfolio and making clear choices about timing, available capacity, dependencies and trade-offs.

Reform congestion should be distinguished from related concepts:

- Policy fragmentation describes disconnected responsibilities or instruments. Fragmentation can contribute to congestion. Congestion also concerns the total load that reforms place on implementation.
- Reform fatigue refers to declining motivation among people repeatedly exposed to change. It may result from congestion.
- The implementation gap describes the distance between policy intent and delivery. Congestion can be one systemic cause of this gap.
- Donor duplication refers to overlapping external support. It can add to congestion by creating parallel structures, incentives,

reporting obligations or pilots outside national systems.

The concept therefore offers a single view of implementation that connects the portfolio's architecture, sequencing, financing and monitoring with institutional capacity and stakeholder participation.

Reform congestion is best understood within the wider policy cycle. At the planning stage, a proliferation of priorities and strategies may create strategic overload when objectives are insufficiently prioritised or poorly linked to delivery, including the allocation of responsibilities and budgets. During implementation, strategic overload may translate into bureaucratic overload and informal policy triage. Administrations then decide which obligations to pursue and which to postpone, while others may receive no attention. Reform fatigue and implementation gaps may follow.

Each concept describes a different part of the process. Reform congestion refers to the system-level mismatch between the demands of the combined reform portfolio and the capacity to deliver it coherently (Adam et al., 2019; Knill, Steinebach and Zink, 2024).

3. How reform congestion develops

3.1 Strategic overload and weak prioritisation

Reform congestion often begins at the planning stage. Strategies may contain numerous objectives, all presented as priorities to be pursued at the same time, with limited clarity on choices, sequencing, responsibilities, costings and delivery arrangements. When new strategies and plans are added before earlier commitments have been consolidated, those responsible for implementation inherit a portfolio that may already exceed their realistic capacity.

Effective policy design therefore starts with a limited number of clear objectives. It also requires an early assessment of feasibility and a coherent implementation strategy (Viennot and Pont, 2017).

3.2 Layering rather than consolidation

New reforms are frequently added to existing arrangements before earlier reforms have been completed or integrated into the system. Outdated arrangements may also remain in place. A new national qualifications framework (NQF) may coexist with old certification rules, while new quality assurance bodies may operate alongside legacy accreditation procedures. New sector skills councils may also overlap with older advisory structures.

A new TVET law may introduce new pathways, institutions, governance bodies and implementation requirements while earlier legal provisions may remain in force, alongside existing mandates and procedures. The law may therefore create a broad reform agenda that lacks the sequencing, resources, coordination mechanisms or implementation capacity required to put it into practice.

Each addition may be justified when considered on its own, but their cumulative effect is an architecture that becomes increasingly difficult to steer. Overlaps and ambiguities place further pressure on institutions that are already stretched.

3.3 Pilot proliferation and the “project trap”

Pilots are valuable when they test assumptions and inform decisions about scale-up.

Congestion develops when each pilot has separate arrangements for governance, data, financing and capacity-building. It also develops when pilots continue without adaptation of scale-up and without a decision to close them. The system then accumulates pilot projects with no change to its core operating model.

3.4 Misaligned reform cycles

Political priorities, national budgets, donor programming and institutional planning often work on different time horizons. A reform may be announced during one political cycle and receive funding during another. The institutional changes may extend beyond both. Short project cycles can encourage a focus on visible outputs and leave too little time to strengthen institutions and data systems or build sustainable implementation capacity.

3.5 Limited absorption and implementation capacity

The same senior officials and technical units are often expected to lead multiple strategies, participate in coordination bodies, review legislation, manage projects and report to several partners. Capacity constraints cover staff numbers, authority, analytical capability, implementation routines, provider readiness and the ability of social partners to participate meaningfully. This reflects the interaction of analytical, operational and political capacities at individual, organisational and system levels (Wu, Ramesh and Howlett, 2015).

3.6 Weak feedback loops

Monitoring frequently focuses on activities and expenditure. It may provide little evidence on whether reforms are being implemented as intended or where bottlenecks are emerging. It may also fail to show when one initiative is undermining another. When monitoring remains at project level, the wider pattern of congestion remains hidden. It is only seen in project delays and underperformance, or in signs of reform fatigue.

4. Why congestion matters: systemic consequences

Consequence	Typical manifestations
Implementation dilution	Attention, expertise and political sponsorship are spread across too many priorities. Reforms advance at a formal level, with little operational progress.
Institutional overload	Coordination bodies, ministries, agencies and providers face competing demands and reporting requirements.
Reform inconsistency	Strategies, legislation, financing and delivery instruments send different signals to the same actors.
Pilot dependency	Innovation remains externally financed and locally bounded, with limited integration into the national system.
Equity risks	New opportunities reach well-connected institutions and learners first. Disadvantage groups face a more fragmented landscape.
Loss of ownership and reform commitment	Actors disengage when consultations end without decisions or priorities change repeatedly. Commitment also weakens when promised actions are not implemented.
Reduced learning	The volume of activity leaves little time to assess results and consolidate successful approaches. Decisions to abandon weak approaches are delayed.

5. From reform lists to reform portfolios

Managing congestion requires a portfolio approach, with each reform considered in relation to the wider agenda. The aim is to make dependencies, capacity requirements and trade-offs visible, without creating another master plan. This approach is consistent with broader evidence that effective reform depends on commitment, coordination and cooperation, and that skills governance requires sustained collaboration across ministries, agencies and stakeholders (World Bank, 2017; OECD, 2020).

5.1 Build a reform architecture

Map current strategies, legal changes, institutional reforms, financing streams, donor programmes and pilots against the outcomes they seek. The map should show which initiatives provide foundations for others, which depend on other reforms, which duplicate existing functions and which lack clear links to implementation arrangements.

5.2 Prioritise explicitly

Prioritisation should consider political importance alongside urgency, expected systemic contribution, feasibility, equity, institutional readiness, recurrent costs and dependencies on other reforms. A credible

reform portfolio also requires the political willingness to stop, merge or redesign initiatives that are ineffective, duplicated or no longer relevant.

In practice, launching a new initiative is often easier than closing an existing one, particularly where institutions and jobs are involved or social expectations have formed. Ending an initiative may therefore require social dialogue and practical transition measures, including the redeployment of teachers and other staff. When such decisions are delayed, reform portfolios continue to accumulate and become harder to adapt.

5.3 Sequence around dependencies and readiness

Some reforms can produce results only once foundations are in place. Micro-credentials, for example, depend on credible quality assurance, recognition rules, data standards, provider capacity, guidance and sustainable financing. Expanding work-based learning may require employer coordination, standards, incentives and provider-level implementation capacity. The logic of the system should determine sequencing. The availability of project funding is a secondary consideration.

5.4 Protect implementation capacity

A realistic reform portfolio should identify the institution leading each priority and the capacity it requires. It should show the competing responsibilities that the institution already carries. Where the same unit is central to several reforms, the portfolio should reduce simultaneous demands or provide additional capacity.

5.5 Monitor implementation and policy interactions

Monitoring should combine skills intelligence and project outputs with a wider view of implementation. It should track progress against agreed reform actions, institutional decisions, resource commitments, delivery bottlenecks and interactions between reforms. The purpose is to support accountability and adaptation. Evidence should trigger decisions to accelerate, redesign, merge, pause or stop initiatives.

6. A traffic-light diagnostic for reform congestion

The following diagnostic supports rapid, structured reflection. It does not produce an index or ranking. A red signal identifies an implementation risk that requires an explicit management response. It is not a judgement

that the reform itself is wrong. The diagnostic identifies risk and prompts an explicit portfolio decision: continue, accelerate, consolidate, redesign, pause or discontinue.

Dimension	Green	Yellow	Red
Strategic focus and coherence	A limited set of outcomes is clearly prioritised and linked to responsibilities, budgets and implementation arrangements.	Priorities are numerous or weakly ranked; some responsibilities, budgets or sequencing remain unclear.	Strategies and plans contain competing or disconnected priorities that exceed realistic implementation capacity.
National ownership and alignment of external support	External support responds to nationally agreed priorities, is integrated into national reform structures and strengthens implementation capacity.	Initiatives are broadly aligned with national priorities. They may still be partly shaped by donors, separate arrangements or limited government ownership.	Initiatives are driven mainly by donors, use parallel structures for design or implementation, and have weak links to national priorities, institutions or budgets.
Prioritisation and sequencing	Dependencies are explicit; priorities match system readiness.	Several reforms move in parallel with unclear sequencing.	Major initiatives are launched before prerequisites are in place or earlier reforms have been consolidated.
Institutional capacity and accountability	Mandates, decision rights and lead responsibilities are clear and realistic.	Responsibilities are formally assigned. Capacity is stretched or coordination is weak.	Overlapping mandates, overloaded units or unclear accountability block implementation.
Financing alignment and sustainability	Domestic and external finance support agreed priorities and recurrent costs.	Funding is fragmented, short-term or only partly aligned.	Competing projects, parallel systems or unfunded recurrent obligations dominate.
Stakeholder ownership and participation	Relevant actors participate, understand the trade-offs and see commitments followed through.	Consultation takes place with uneven follow-up, representation or influence.	Repeated consultation without decisions, abrupt changes or exclusion undermine ownership and participation.

Dimension	Green	Yellow	Red
Data, monitoring and learning	Implementation and outcomes are monitored; evidence informs adaptation.	Monitoring is partial or focused mainly on activities.	There is no portfolio-level view; problems are detected late and evidence is not used for learning.
Scaling and sustainability	Pilots have explicit pathways to institutionalisation, adaptation or closure.	Scale-up is discussed but responsibilities and costs still unclear.	Pilots accumulate without decisions, sustainable financing or integration into national systems.

Donor involvement does not in itself create reform congestion. It can provide essential financing, expertise and momentum. The risk arises when externally supported initiatives are insufficiently anchored in national priorities, institutions and budgets, or are implemented through parallel structures. In such cases,

donor-specific agendas, visibility requirements and funding cycles may take precedence over national reform needs. The initiatives may also compete for limited administrative capacity and be less likely to continue once external support ends.

7. Three Southern Mediterranean illustrations

These short illustrations draw on field experience and published ETF analyses. Their scope is limited to selected forms of reform congestion and risks of misalignment; they do not provide comprehensive country assessments. The examples highlight different

issues within a related set of risks: coordinating an expanding portfolio of interconnected reforms in Egypt; integrating innovations into coherent lifelong learning pathways in Morocco; and ensuring continuity, consolidation and scale-up in Tunisia.

Egypt: expanding reform architecture and the challenge of integration

Egypt's Technical Education 2.0 agenda has combined competency-based curricula, applied technology schools, centers of competence, work-based learning, quality assurance reform, sector engagement, teacher development and measures to improve the public perception of technical education. This breadth reflects strong ambition and growing ownership. It also creates dependencies across institutional mandates, financing, donor programmes and monitoring.

ETF assessments have repeatedly stressed the need to translate the broad vision into a monitoring framework and implementation plans that clarify responsibilities, timelines, resources and indicators. The lesson is to sustain this ambition by managing the reforms as a connected portfolio. Monitoring can then identify where multiple models or initiatives should be harmonised, sequenced or scaled (ETF, 2025a; ETF, 2025b).

Morocco: innovation needs stronger integration into lifelong learning pathways

Morocco's Torino Process monitoring describes a system with significant innovation capacity and comparatively strong steering and resourcing. It also identifies weaker participation in continuing VET and other adult learning opportunities, limited permeability between pathways, and uneven quality and relevance.

This combination illustrates a common congestion risk: innovation and new initiatives may progress faster than the integration of initial VET, continuing training, guidance, recognition and progression into a coherent lifelong learning system. Prioritisation should therefore assess the number of innovations launched and the extent to which they remove bottlenecks in access, transitions and system coherence (ETF, 2023b).

Tunisia: strong strategies, donor-supported pilots and discontinuity

Tunisia has developed ambitious reform strategies and benefited from extensive international support. ETF analysis found that frequent political and institutional changes, discontinuity in policy and difficulty capitalising on successful pilots slowed implementation.

The country case shows that reform congestion can coexist with strong strategic documents. The challenge lies in sustaining leadership, consolidating pilots, aligning regional and national responsibilities, strengthening information systems and making deliberate decisions about what to scale. Continuity and credible follow-through are especially important when reforms require social partners, providers and regional actors to invest in roles and capacities that develop over time (ETF, 2021a; ETF, 2023c)

8. Applying the portfolio approach: lifelong learning as shared infrastructure for emerging transitions

This section illustrates how the reform-portfolio approach can be applied to a cluster of fast-moving agendas. Digitalisation and artificial intelligence, greening, flexible credentials and reskilling are distinct priorities. They frequently rely on the same infrastructure for qualifications, quality assurance, guidance, financing, provider capacity and skills intelligence.

Lifelong learning therefore needs to serve as an organising principle across the wider agenda. It connects initial education, continuing vocational education and training, adult learning, employment services, qualifications, guidance and financing around people's changing learning needs throughout life. This approach treats lifelong learning as shared infrastructure across sectors and avoids adding another reform layer to an already crowded agenda.

In congested systems, the policy test is whether existing institutions and instruments allow learners to move between learning and work and to re-enter education without unnecessary duplication or dead ends. The existence of a new lifelong learning strategy alone provides little evidence of this. This system-wide understanding is consistent with the lifelong learning perspective underpinning the Torino Process and with UNESCO's conception of lifelong learning as a principle connecting learning across institutions, settings and stages of life (ETF, 2022; UNESCO Institute for Lifelong Learning, 2022).

This perspective is increasingly important because technological, environmental, demographic and economic transitions are changing the content of skills and the rhythm at

which they must be renewed. Earlier ETF work on human capital development in the Southern and Eastern Mediterranean highlighted the need to connect education and training reforms with longer-term economic and social transformation and to maintain a system-wide lifelong learning perspective (ETF, 2021c). More recent ETF work on future skills and new forms of work shows that digitalisation, green industries and platform-based work create new opportunities and increase the need for continuous updating, recognition and portability of skills (ETF, 2024a; ETF, 2024b).

8.1 Digitalisation and artificial intelligence

Digitalisation and artificial intelligence affect occupations across sectors and cut across established policy domains. They change job tasks, business models, service delivery and the ways in which learning can be organised. A congestion risk emerges when countries respond through separate digital skills strategies, AI initiatives, online-learning platforms, occupational standards and short training programmes that are not connected to qualifications, quality assurance, guidance or employer demand.

A lifelong learning approach brings these initiatives into a common architecture. It distinguishes the digital capabilities needed by all citizens and workers from advanced occupational and sector-specific skills. It also connects initial preparation with continuing upskilling and combines digital and online learning with provider development, teacher capacity, quality assurance and inclusion.

The ETF's work on digital skills and digital and online learning argued that digital

transformation should modernise access to and provision of TVET from a lifelong learning perspective. Equipment purchases and stand-alone projects should form part of this wider reform (ETF, 2023a). The same principle applies to AI: rapid pilots can be useful, but sustainable impact requires their integration into wider learning pathways and governance arrangements.

8.2 Greening and emerging economic sectors

The green transition also generates demand for new skills, although these needs rarely fit neatly within a single new occupation or training programme. Greening changes production methods, regulations, technologies and work organisation across energy, construction, transport, agriculture, tourism, manufacturing and services.

Research on future skills in ETF partner countries points to significant employment potential in technology, digital marketing and green industries. It also stresses that individuals and systems must adapt continuously as skills requirements evolve (ETF, 2024a). Sector work in Morocco's agri-food economy similarly illustrates how green and digital transformation interact and require coordinated changes in skills, production and market strategies (ETF, 2021b).

A proliferation of isolated "green skills" projects would add to reform congestion. Priority sectors should be identified through economic and labour market evidence, and their skills implications should be connected to existing occupational standards, curricula, continuing training, recognition arrangements and employer partnerships.

Lifelong learning provides the horizontal logic for this work. It enables workers already in employment, jobseekers and new entrants to access different forms of learning through a common system. This reduces the need for separate systems for each transition.

8.3 Flexible learning, recognition and access

Emerging transitions increase demand for shorter and more flexible learning

opportunities, including modular provision, micro-credentials, work-based learning and targeted upskilling and reskilling (Council of the European Union, 2022). These instruments can widen access and respond quickly to changing needs. However, when they operate as parallel initiatives, they can also add new providers, platforms, standards and certificates to systems that already struggle with fragmentation.

Their contribution to lifelong learning therefore depends on how they connect to the wider system. Key questions include whether learning outcomes are quality assured; whether achievements can be accumulated or recognised towards larger qualifications; whether learners receive guidance; whether employers understand and value the credentials; and whether financing supports access for adults and disadvantaged groups.

The objective is permeability across diverse forms of provision. Flexible instruments should create bridges across education, training and employment and form part of the wider system.

8.4 Implications for managing reform congestion

A lifelong learning perspective can reduce congestion when it is used to organise emerging agendas around common system functions. Digitalisation, AI, greening and new forms of work require different thematic expertise and share foundational needs: reliable skills intelligence, flexible and quality-assured provision, recognition of learning, capable providers and teachers, guidance, sustainable financing and employer engagement. Managing these needs as shared infrastructure helps avoid creating a separate strategy, coordination body, data system and pilot portfolio for every emerging theme.

The practical question is how existing institutions and reforms can be adapted so that people can acquire, update, combine and use skills throughout life. The number of new initiatives launched under each transition is a poor measure of progress. This approach supports a coherent lifelong learning system capable of absorbing future change and reduces thematic project accumulation.

9. Policy implications

Who leads. The process should be sponsored by the national authority accountable for the overall skills strategy or reform portfolio and, wherever possible, organised through an existing cross-government mechanism. Ministries responsible for education, labour, the economy and finance should contribute to the diagnosis and subsequent decisions, alongside implementation agencies, providers and social partners.

How to apply the framework. A practical sequence involves five steps: (1) map current strategies, legislation, institutions, programmes, financing and pilots; (2) apply the traffic-light diagnostic jointly; (3) decide which initiatives to continue, accelerate, consolidate, redesign, pause or discontinue; (4) translate these decisions into a sequenced and costed implementation plan with clear responsibilities; and (5) review the portfolio regularly and adapt it on the basis of implementation evidence.

Diagnostic dimension	Practical policy response	Main responsibility
Strategic focus and coherence	Limit the number of outcomes and establish a clear hierarchy among them; consolidate or retire overlapping strategies; link priorities to delivery arrangements.	Political and strategy leadership
National ownership and alignment of external support	Agree a nationally owned portfolio and align partner programming, reporting and technical support behind it.	National coordinating authority and international partners
Prioritisation and sequencing	Map dependencies and readiness; decide explicitly what should start now, follow later, be merged or be paused.	Coordinating authority and line ministries
Institutional capacity and accountability	Assign a lead, decision rights and delivery responsibilities for each priority; compare the resulting workload with available capacity.	Lead ministries and agencies
Financing alignment and sustainability	Estimate capital requirements and recurrent obligations; align domestic and external funding with the agreed sequence.	Finance and planning authorities and funders
Stakeholder ownership and participation	Engage implementers and social partners at decision points; explain trade-offs and report how their input was used.	Lead authority and social partners
Data, monitoring and learning	Track milestones, bottlenecks and interactions across reforms; use reviews to accelerate, redesign, merge or stop initiatives.	Strategy or monitoring and evaluation function, together with delivery bodies
Scaling and sustainability	Define from the outset the evidence, responsibility, financing and capacity required to scale, adapt or close each pilot.	Programme owners and financing authorities

International partners and organisations such as the ETF can support this process through diagnostics, policy dialogue, comparative evidence and implementation learning.

National authorities should retain responsibility for reform choices and trade-offs, as well as overall ownership of the process.

Conclusion

The next generation of skills reform is unlikely to suffer from a shortage of ideas. Its main challenge will be to convert multiple ambitions into a coherent and implementable portfolio. Reform congestion provides a practical lens for understanding why technically valid initiatives can collectively overwhelm institutions, fragment financing and weaken implementation. Lifelong learning provides a complementary system perspective: it helps organise responses to emerging transitions around shared pathways, institutions and infrastructure, while limiting the creation of separate reform layers.

Reforms can continue, supported by disciplined reform management: diagnose the

architecture, prioritise transparently, sequence around dependencies, protect implementation capacity, align financing and partners, and monitor delivery so that the portfolio can adapt. These functions are especially important as countries move towards lifelong learning systems capable of responding coherently to digitalisation and AI, greening, demographic change and new forms of work.

A congestion-sensitive approach shifts the central question from “What additional reform should be launched?” to “Which combination of reforms can this system implement coherently now, and what foundations are needed for the next stage?”

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