

## CONTINUING THE EUROPEAN EDUCATION AREA

### BACKGROUND

The [European Education Area](#) (EEA) is the EU's principal strategy on education and training. In 2020, it was launched through an European Commission [Communication](#), setting up targets for achievement until 2025. This was supplemented by two Council Resolutions on a [strategic framework](#) for European cooperation in education and training towards the European Education Area and beyond (2021–2030) and on the [governance structure](#) of the strategic framework for European cooperation in education and training towards the European Education Area and beyond (2021–2030). This expanded the outlook from 2025 to 2030. The European Commission came up with a Progress Report ([2022](#)) and a mid-term review process ([2023](#)) to collect data on how the EEA is being implemented. These feed the EEA's interim evaluation (2024-2025) and impact the future priorities and format of the EEA. In the context of the interim evaluation, the Commission launched an Open Public Consultation (OPC). This Statement provides the civil society perspective on the EEA, being an annex to LLLPlatform's response to the OPC.

### NEW AND OLD POLICIES AND OBJECTIVES FOR THE EUROPEAN EDUCATION AREA

LLLPlatform and its membership highly appreciate the European Education Area and its achievement. While this Input Paper will propose numerous areas to be strengthened, the general objectives and targets are recognised as meaningful and positively advancing the education and training agenda across the EU Member States. Various methods of stakeholder inclusion at EU level have also shaped the direction in which the EEA has been going, and the initiatives proposed have been overall appreciated, with much interest dedicated to the way in which they would be implemented.

Therefore, the following sections would propose potential new priorities and insist on ways to achieve some of the already existing priorities/dimensions, with future sections detailing what would be needed in terms of governance, funding, monitoring and approaches to achieve them.

### Equity and inclusion

LLLPlatform agrees fully with the European Commission in its identification of equity and inclusion challenges throughout its Progress Report and mid-term review of the EEA. Learners are lagging behind based on their socio-economic background or based on regional discrepancies. This is documented across the entirety of the EU, while also captured in terms of achievement in basic skills. The widening social cohesion and inequality gap across the EU, impacted by, and in turn impacting, inequities in learning, is one of the main challenges that the EEA is focused on and LLLPlatform supports this. **Linking the Pathways to School Success initiative with other policies and funding to tackle childhood inequities**, such as the European Child Guarantee are welcomed. **The recently formed indicator on equity should be mainstreamed across the European Semester and the Education and Training**

**Monitor**, ensuring that it is used consistently by Member States to understand the challenges ahead and identify opportunities to combat this.

### **Informal and non-formal learning**

The EEA, as of now, remained mostly focused on formal education. As learners find themselves in a world where lifelong learning is understood as any type of learning across their lives, at all levels and in all formats (informal, non-formal and formal), it is time for the EEA to adapt to promote a holistic approach to learning for all. **It needs to improve its synergies with the European Skills Agenda, as well as with the European Agenda for Adult Learning 2021-2030, and accelerate initiatives on validation, recognition, guidance and general synergies among learning environments.** This can leverage a better transfer of practices and knowledge from one sector of learning to another, but would also better empower learners to pursue a learning experience that fits their needs, expectations and wants.

As the EEA has strengthened the standing of formal education it is now time to reflect on how other formats of learning can be brought into the fold, funded, and supported to develop and complement formal education. **Therefore, the EEA should foresee in the coming years initiatives for joint cooperation across sectors and formats of learning, should promote innovation of pedagogies and approaches and learning leveraged from informal and non-formal environments and should set targets and indicators monitoring the progress in non-formal and informal learning, effectively promoting a whole-of-institution or whole-community approach.** All of this should come on top of ensuring that the Council Recommendation on the Validation of Non-formal and Informal Learning becomes a reality.

### **Well-being**

It should be a prerogative for the EEA to promote safe learning spaces, both physically and mentally. Without prioritising well-being in all learning settings, we will continue to see lower performance rates both for basic skills and for participation in learning, as reported, among others, in PISA 2022. Thus, LLLP welcomes the new [EU Guidelines](#) for wellbeing and mental health at school: Guidelines for education policymakers, school leaders, teachers and educators. **To see these guidelines take ground, the European Commission should form dedicated funding to help implement the Guidelines at Member State level, and should promote cooperation between formal, non-formal and informal education providers.** Such cooperation should be centred around identifying practices and pedagogical approaches, with attention to teaching and assessment diversity, that foster well-being in education and training, both for learners and educators. Additionally, diversity and pluralism of pedagogical approaches should be promoted, because only the diverse education offered can answer learning needs and styles for every learner. Moreover, this approach taken for compulsory education should be expanded across all levels and formats of learning, considering that well-being ought to be fostered across the entire lifelong learning process.

### **Citizenship education**

With Member States holding competences in education and training, one of the roles of the EU, under the principle of subsidiarity, has been to promote democratic values. In the context of the 2024 EU elections, there has been a rise in anti-democratic sentiments. Political extremism, polarisation and euroscepticism should be challenges looked at in the near-future to ensure that they do not tear the fabric of the European project. To this end, **LLLPlatform strongly believes that citizenship education should become a standalone transversal EEA priority.** Though it is transversally approached across the different priorities, it often falls through the cracks.

Looking at the most recent results of the [ICCS study](#) from 2022, the civic competences of learners have been on a downward trend in the past years. This comes at the time when the definition of citizenship education or of civic competences suffers constant transformation. The changing world has brought to us notions of digital and global citizenship. In an increasingly complex world, learners need to understand that their civic competences are no longer confined to national borders, but rather channelled in the borderless online realm and across a globalised, interconnected world in which the actions of one citizen impact many others. **Considering the importance given to citizenship education in the Erasmus+ programme as well, it must become a standalone transversal priority of the EEA.** This request is echoed by the [Conference on the Future of Europe](#).

## GOVERNANCE IN THE EUROPEAN EDUCATION AREA

### The Legal Ground for the High Level Group and democratic governance

Though the Council of the EU leads the governance structure of the EEA, its approach is fed by discussions, initiatives and inputs from a series of informal structures, such as the High Level Group (HLG) of the EEA, which reunites the Member State Ministries responsible for education and training with European Commission officials. This is complemented by Directors-General (DGs) meetings, which are sectorial reunions of Member States representatives and European Commission officials on VET, higher education and school education. The Council Presidency is entitled to invite stakeholders or other types of participants to the meetings of these informal groups, where relevant. Though this has been better entrenched across the DGs, it has been rarely implemented for the HLG. Out of five presidencies presiding over the HLG, the Belgian Presidency was the first to invite other stakeholders and civil society representatives. **If EU institutions and Member States are committed to achieve the EEA, its governance cannot occur behind closed doors, excluding learners, educators and providers directly impacted by reforms.** We can look for example at ERA and EHEA where indeed stakeholders organisations have played a key role in their success.

For a full and successful implementation of the **Council Resolution on the governance structure of the strategic framework for European cooperation in education and training towards the European Education Area and beyond**, civil society organisations and networks like LLLPlatform and its members should be regularly involved in the HLG. Though this is the responsibility of the Council Presidency to ensure this, **all EU institutions shall ensure the proper checks and balances for this.** Therefore, based

on TEU ([Treaty of the European Union](#)) Articles 10, 11 and on TFEU ([Treaty of the Functioning of the European Union](#)) Article 15, EU institutions should ensure civil society is involved in the work of the EU institutions, and that there is ample space for exchange of views. Based on TFEU Article 19, there **cannot be a discrimination with regard to which civil society is involved**. Lastly, based on the **legitimate expectations doctrine**, the HLG created a reasonable expectation for civil society to participate in it and an obligation on behalf of all EU institutions to facilitate this or hold accountable those preventing this inclusion.

Beyond the main EEA governance bodies, it needs to be recalled that each initiative foresees efforts for democratic governance. This is highly appreciated by LLLPlatform and encouraged to continue in the next cycle. However, the participation of representative bodies in these democratic governance processes must not be done in an arbitrary fashion and must ensure key stakeholders are present. For example, the European University Alliances ought to ensure democratic voices are heard and not cherry-picking bodies that represent only a small fraction of concerned beneficiaries.

### **Replicating the structure of EU Working Groups**

As a remnant of the ET2020 framework, the Working Groups continued to be one of the highly lauded EEA initiatives supporting Member States in their efforts to align with EU recommendations. The mix of governmental representatives, EU institutions and civil society representatives led to multiple high-quality inputs which strengthened recent EEA initiatives and synergies. The openness at EU level to involve civil society in the WGs has been highly appreciated. However, the EU-level stakeholders involved in the WGs have their own national equivalents, usually as members. These national equivalents are not involved at national level in policy making with the same consistency as the EU-level stakeholders. Though this aspect remains a prerogative of each Member State, respecting the principle of subsidiarity, very often Member States are overwhelmed in identifying the correct counterpart. **The European Commission should take advantage of the Working Groups to provide Member States with information on who are the national-level civil society networks that would bring an added value to policymaking and would ensure the democratic participation of stakeholders.** This can be done in partnership with the EU networks that already represent these national-level networks within the Working Groups.

## **FUNDING IN THE EUROPEAN EDUCATION AREA**

### **Increased funding in the sector**

The open public consultation on the interim evaluation of the EEA conflates in its questions the amount and efficiency of spending. Low spending does not necessarily imply efficiency, just as the same for high spending. There is a risk of returning to the language of austerity when conflating words like 'low' with 'efficiency'. The achievement of the EEA requires adequate funding, sufficient resources and quality spending at the EU and national levels. Considering that the reforms foreseen are structural and

comprehensive, and that the targets focus on increased participation in learning at all levels of education and training, we cannot fathom any future proposal that does not consider increased investment. During this interim evaluation there needs to be an acknowledgement of the role funding plays in reaching the EEA objectives. Even if EEA itself cannot demand increased funding, it could serve as a catalyst to encourage Member States to allocate the necessary funding.

Looking back on the proposals made by the European Commission as part of the EEA, there have been numerous opportunities where a request for additional funding could have been made. Reflecting on the [Proposal for a Council Recommendation Pathways to School Success](#) and the [Proposal for a Council Recommendation Europe on the Move](#) as examples we can see this trend. Pathways to School Success foresaw references to training, support personnel, a change of the paradigm of evaluating success in education and training. All of these efforts would require additional funding, at least in the early implementation stages. However, the Proposal claimed that ‘additional resources from the EU budget’ would not be needed. Similarly, Europe on the Move, with its increased mobility targets would require additional funding considering how current targets cannot be met due to serious underfunding of learning mobility<sup>1</sup>. Nevertheless, the Proposal included the same mention on funding as for Pathways to School Success. **Such mixed signals - more ambitious targets and no additional funding - make stakeholders worry that the EEA cannot be fully and successfully achieved.** Moreover, by not providing targets for any other format of learning besides VET and higher education, Europe on the Move makes it difficult to establish what type of funding would be required for school and adult education, effectively slowing down progress on learning mobility in those sectors in the absence of adequate mapping and planning for the sectors. In both cases, the Proposals became Council Recommendations with no further additions on funding. This also implies no consideration on how funding could have been used to increase partnerships with civil society organisations or other types of learning providers which already provide actions for boosting school success or learning mobility.

### **Funding associated with monitoring**

Though the need for additional funding is clear, civil society acknowledges that current resources could be better administered. Therefore, the [Learning Lab](#) on Investing in Quality Education and Training is essential in supporting Member States to identify how to invest effectively in the sector. This being said, such an approach to funding requires more intense monitoring mechanisms and certain conditionalities imposed on Member States to ensure that inequity gaps can be closed across the EU.

To avoid overburdening Member States with additional monitoring mechanisms, it would be beneficial for the **EEA to be mainstreamed across the European Semester, and connected to reviews of the implementation of other funding programmes beyond Erasmus+.** Member States already report in the framework of the [European Semester](#) and the [Recovery and Resilience Facility](#). In those contexts, education and training is a subsection, but it must be expanded to look in detail at the EEA initiatives.

---

<sup>1</sup> See Lifelong Learning Platform’s Reaction to Europe on the Move, [here](#).

Considering how high competence development is on the agenda of the EU and of Member States, this should be reflected in the EU Semester and should lead to a more active effort from the **EU institutions to ensure that social Country Specific Recommendations are implemented adequately by Member States**. Similarly, reviews of funding programmes such as ERDF, ESF+, TSI, DEAR, etc<sup>2</sup> should reflect more on **how they meet objectives of the EEA considering that they also fund education and training**. In this way, the EU funding programmes could be used more effectively to support national funding in the sector.

## Erasmus+ and next MFF

Though there is a need to understand that EEA is dependent on many other funding programmes besides Erasmus+, it cannot be denied that Erasmus+ is the most important EU funding dedicated to education and training. Beyond learning mobility, it funds specific initiatives of the EEA, cooperation across stakeholders and policy experimentation. It sets the direction of the EU agenda in education and training considering the priorities and objectives that it tries to meet through the funding disbursed.

Given this context, the Erasmus+ programme requires a boost in upcoming negotiations for the Multiannual Financial Framework. The EEA interim evaluation should highlight the insufficiency of the Erasmus+ budget in meeting the numerous newly created initiatives in the context of societal crises. The ambitions of European University Alliances or Centres for Vocational Excellences, of improving wellbeing in learning, of combating gender stereotypes in learning and of improving the educator profession, to name only a few, have carved parts of the Erasmus+ budget which is still dedicated primarily to learning mobility - another underfunded element<sup>3</sup>. For the EEA to continue its implementation path for 2030, the Erasmus+ programme should be matching the EEA ambitions and it can do so with an increase that would at least triple the current budget, based on the European Parliament request<sup>4</sup>.

A final consideration is linked to sustainability. Funding in the sector should promote exclusively green solutions (be it for transport, for data storage, for implementation of learning activities). Additional funding will be required to ensure that green travel is possible, that bureaucracy is reduced and that the stakeholders are trained accordingly to promote sustainability.

## IMPLEMENTATION OF THE EUROPEAN EDUCATION AREA POST-2025

### Implementation of current reforms

LLLPlatform appreciates the EEA's ambitions and launched reforms, during a period of tremendous development in education and training. Nevertheless, much of the past years focused on strategising and launching initiatives, risking to place Member States and stakeholders into a fatigue of reforms. The

<sup>2</sup> The above represent various funding programmes of the EU. You can read more on the European Regional Development Fund (ERDF) [here](#). More can be found on the European Social Fund+ (ESF+) [here](#). To find more information on the Technical Support Instrument (TSI), click [here](#). Lastly, for more information on the Development Education and Awareness Raising (DEAR) programme, click [here](#).

<sup>3</sup> See the Erasmus Student Network assessment of this, [here](#).

<sup>4</sup> European Parliament (2023). REPORT on the implementation of the Erasmus+ programme 2021-2027. Available [here](#).

focus as of 2025 should fall on the implementation of current reforms, avoiding duplication and creation of new routes for achieving the EEA but rather using existing Council Recommendation and Communications and securing the funding and commitment needed for their implementation.

As already mentioned in the previous section of this Input Paper, the goal is to maintain the consistency and coherence of the already existing reforms, and avoid duplicating the workload and frustrating meaningful implementation. That being said, a whole-of-government approach would be needed, considering that not all these aspects on which the EEA success depends fall under the purview of the EEA or under DG EAC responsibility. Nevertheless, support from the European Commission in jointly promoting such an approach to policy implementation would go a long way in ensuring that the other bodies of the Commission or other EU institutions would take note of the needed policy coherence.

Nevertheless, LLLPlatform would like to point to its 2020 [Reaction](#) to the Communication on Achieving an European Education Area by 2025. The point was to ensure that the EEA connects with previous initiatives as well, creating a continuum for reforms. References were made to the [2018 Council Recommendation on Automatic Recognition of Learning Periods Abroad](#) and the [2018 Council Recommendation on Key Competences for Lifelong Learning](#). Considering the automatic recognition, there are still significant problems across the EU, and progress, beyond higher education, has been minimal. Similarly, the approach for key competences have lost some momentum across the EU if we consider the European Year of Skills which has shifted attention solely to skills. Within this context, the [2012 Council Recommendation on the Validation of Non-formal and Informal Learning](#) must also be mentioned. Progress has been uneven across the EU, and many Member States have advanced minimally from 2012 on this point<sup>5</sup>. This frustrates even further steps of ensuring transferability between sectors and facilitating flexible learning pathways. The period post-2025 will have to assess how to ensure coherence with the previous initiatives as well.

### **Commitment to post-2025**

The Council Resolutions regarding the EEA strategic framework hint for a period until 2030. The current EEA evaluations contribute to establishing how the next cycle would look like based on what is achieved by 2025. However, any recommendations coming from the evaluation will be insufficient. There needs to be a renewed political commitment to advancing the EEA considering how this depends on the willingness of Member States. In the context of a new European Parliament and a new college of Commissioners - potentially including new Commissioner portfolios -, **a new Declaration or Action Plan for the period post-2025 will be required**. This can be developed in the context of the **European Education Summit, which ought to be retained in the next Commission mandate, and coupled with the Lifelong Learning Stakeholders' Forum** which brings forward the civil society perspectives as well.

### **Targets**

---

<sup>5</sup> European Commission (2023). Upskilling Pathways Evaluation Package, [here](#).

The EEA targets remain a guiding point, benchmarking the performance of the EU across the years. The targets remain ambitious and one could look at instances of participation in ECEC, academic achievement in HE or the rate of early school leaving and contend that progress has been made across the EU. That being said, none of those targets have been fully met. Even more problematic is the fact that there has been a **sliding back on the targets related to achievement in basic skills while data on participation of adults in learning is not available**. There is no doubt that much work will be needed to meet the remaining targets, however, it also depends on how this is being monitored. Considering basic skills, for now, it all depends on standardised testing through PISA. Besides the fact that this method of testing is not always capturing the competences that learners actually have<sup>6</sup>, it limits the understanding of basic skills to maths, literacy and sciences. **The next EEA cycle provides the opportunity to rethink how to monitor the broader basic skills that learners should have while also embedding the more formative assessment options which Member States have been actively implementing recently.**

The existent targets ought to be expanded. Civil society has been arguing for targets on the **quality of the learning experience, for wellbeing in education and training and for learning outcomes related to a broader set of transversal competences**, beyond basic skills and with more systematic occurrence<sup>7</sup>. Indicators similar to the one recently developed on equity, which should also be translated into a target, would be required to track progress on such targets.

## CIVIL SOCIETY IN THE NEXT CYCLE

LLLPlatform and its members are committed to support the European Commission and Member States in building a strong European Education Area. As the most comprehensive strategy for education and training in the EU, the project is ambitious, highly appreciated and essential to continue considering how high competence development is on the EU and national agenda. **It nevertheless has to be a truly holistic initiative that gives equal consideration to all learning environments, starting from early childhood education and care and going through compulsory education, higher education, VET and adult education, while giving equal consideration to any type of learning environment, be it formal, informal or non-formal.** This request of LLLPlatform goes back to its [2020 Reaction](#) and remains relevant considering how certain sectors were underprivileged (ECEC, adult education and to some extent VET), while non-formal and informal learning needs a further boost in the EEA. The Open Public Consultation is also phrased in a way that does not allow reflecting on the imbalance between the attention provided to modes of learning.

It remains crucial to engage the civil society at local, regional, national and European level in the process, to ensure that the views of learners and practitioners are considered in the implementation process. It is time to find ways to engage **new allies, across the different EU institutions and across the different national ministries, to ensure that the EEA, as a longer-term process, finds a better footing across the**

---

<sup>6</sup> LLLPlatform 2021 Position Paper on Rethinking Assessments, [here](#).

<sup>7</sup> There are special chapters in each edition where PISA focuses on specific transversal competences, e.g. financial literacy, or creative thinking.



**larger scale national and European policy making strategies.** LLLPlatform supports the previous mid-term review of the EEA and the current interim evaluation, appreciating the comprehensive involvement of stakeholders and looks forward to continuing in this fashion.