The recent release of the Commission’s Communication on “Rethinking Education: Investing in Education for better socio-economic outcomes” reflects the political necessity to give a new conceptual framework to emerging key challenges in education and training. In this Communication emphasis is being placed on delivering the right skills for employment, increasing the efficiency and inclusiveness of our education and training institutions and on working collaboratively with all relevant stakeholders. EUCIS-LLL welcomes the invitation sent to educational actors to rethink education in a partnership and lifelong learning approach. It answers EUCIS-LLL call for a renewed Memorandum on lifelong learning in 2012. But if EUCIS-LLL agrees that it is timely to reflect upon how education and training systems can contribute to economic recovery, it nevertheless regrets the very narrow approach taken in the document. In a very complex and ever-changing globalised environment, Europeans must not only acquire and update specific job-related skills but also develop the transversal competences that will enable them to manage change and become true lifelong learners. If education is part of the solution to the current crisis it can only have an impact with sufficient and targeted investments. EUCIS-LLL thus invites EU institutions to adopt a broader, more ambitious and forward-looking strategy that would cover formal, non-formal and informal learning in a life-wide and learner-centred approach. EUCIS-LLL also stresses the need for more coherence within the whole package and for a clear implementation roadmap that would reflect the priorities and a more holistic approach of the Staff Working Documents.

**EUCIS-LLL Key messages**

**Main concerns:**
- The lifelong learning approach is weak: the Communication is mainly focused on formal education and on Member States and educational institutions.
- A too narrow purpose of education – employment / employability – is problematic. No mention of other important challenges such as low political participation, social exclusion, ageing and migration.
- The Communication does not acknowledge the innovative role played by civil society organisations, which are only mentioned for their role in outreaching disadvantaged groups at grassroots level: we are more than that!
- There is no mention of inclusion and participation: ensuring a wider access to learning is a key issue in order to improve our economy, social cohesion and participation, especially considering the 2014 European Parliament’s elections.
- The SWD on Partnerships has good intentions but how is it going to be implemented and by whom? Who are the stakeholders and what are their respective roles?
- Key questions remain such as: who is taking the leadership and the responsibility to implement the Communication recommendations?

**Concrete suggestions:**
- Give more attention to the lifelong learning approach: recognising formal, non-formal and informal learning. For instance non-formal education is almost absent whereas it has a key role to play.
- Shift the focus from labour market needs, which are difficult to predict in the long run, to learners’ needs, with special attention to their personal and social development.
- Better mainstream the staff working documents priorities in the Communication and in its “key actions”.
• Need to implement sustainable structures of dialogue with stakeholders including civil society actors at national and European level (i.e. participatory Stakeholders’ Forums).
• Adopt a wider approach to key competences.
• Clarify what is the European added value of this initiative.

General Approach

EUCIS-LLL warns that lifelong learning is increasingly giving way to the need to adapt technical skills to labour market changes. The shift of education seen as a public good or human right to a private activity becomes stronger after each economic downturn. Lifelong learning is still a structuring element for competitive knowledge societies but also for personal fulfilment, social cohesion and active citizenship. Education is a governmental responsibility and a public service that should reflect the common interest.

EUCIS-LLL particularly welcomes the Staff Working Document on “Partnerships and flexible pathways for lifelong skills development” that in reality covers the urgent need to implement comprehensive lifelong learning strategies at all levels. EUCIS-LLL believes that this staff working document should be followed by concrete implementation and monitoring mechanisms and be better reflected in the Communication’s “key actions”. EUCIS-LLL thus invites EU institutions to adopt a broader and more ambitious and forward-looking strategy that would cover formal, non-formal and informal learning in a life-wide and learner-centred approach.

Rethinking skills and competences

1) Basic skills acquisition for all: the need for a genuine political will

EUCIS-LLL welcomes the priority given to the need to equip all citizens with basic skills and in particular literacy in line with the Education and Training 2020 Strategic Framework (ET2020). Yet almost one adult in five still does not know how to read and write properly in Europe. The lack of basic skills does not only hinder citizens’ chances of finding a job or being included but also of participating genuinely in the political life of their country and of the EU, which should be encouraged in this European Year of Citizens. Access to learning for those who do not have a sufficient level of basic skills should be a top priority to strengthen our European social model. As stated in the Europe 2020 strategy, “about 80 million people have low or basic skills, but lifelong learning benefits mostly the more educated”. EUCIS-LLL thus welcomes the measures proposed to raise the level of basic skills in the Communication but regrets that there is very little about inclusion in the paper. EU benchmarks cannot be reached if we do not offer targeted learning opportunities for those who are further away from learning. The social dimension of education and training should be strengthened in the Communication.

Innovative solutions are needed; they require the involvement of the whole educating community and proper financial means to be implemented. EUCIS-LLL regrets that civil society organisations are not acknowledged as key actors of social innovation. Indeed who else takes the initiative at the grassroots level? Who contributes to create bridges between the local and national level and the European one?

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3 EUCIS-LLL position on “Social innovation: New ways to provide new skills for new societies”, January 2012.
Tackling the lack of basic skills also requires broadening their spectrum to other key competences, such as digital competences and social and civic competences. EUCIS-LLL deplores that in the Communication the chapter on basic and transversal skills is by half devoted to very specific, technical skills that should not be prioritised before every EU citizen knows how to read, write and live with respect and participate in society.

2) Transversal skills: broadening the scope

The narrow focus on technical, job-related skills is problematic and does not reflect the need to re-think education as announced by the title of the Communication. In a very complex and ever-changing environment, Europeans must not only acquire and update specific job-related skills but also possess the transversal competences that will enable them to manage change and become lifelong learners. We agree that education and the labour market have to be brought closer together but the role and responsibilities of the different players should be clarified. Indeed EUCIS-LLL believes that adopting a holistic vision of lifelong learning also means fostering a learner-centred approach rather than a market-centred one. Education and training systems should equip learners with the competences and skills they will need in order to take an active role in society – in its social, civic and economic dimensions. Today we need a stronger focus on the acquisition of transversal competences in all levels of education and training. In the Council Conclusions of 14/02/2011, most Member States “recalled the importance of establishing lifelong learning strategies [and] the need to continue acquiring and developing new skills throughout life”, in other words to be a “lifelong learner”.

The focus on entrepreneurial skills is very reductive. Not all young people aim to become entrepreneurs and this brings the focus on a very small share of the labour market qualifications. Valuing skills for specific job use and not for their intrinsic value is a tremendous loss of efficiency and impact. Indeed, what are entrepreneurial skills if not transversal competences such as critical thinking and problem-solving, communication, creativity and innovation skills?

EUCIS-LLL welcomes the Staff Working Document on “Assessment of Key Competences in initial education and training” and agrees that assessment is a key issue to tackle in order to move forward. However EUCIS-LLL wishes to see a follow-up of the 2006 recommendation not only in schools but also in all sectors in line with a lifelong learning strategy approach.

Rethinking Open and Flexible Learning

1) A new vision of education: the recognition of learning outcomes challenge

EUCIS-LLL welcomes the emphasis put on learning outcomes in the Communication that values learning in formal, non-formal and informal settings. However it regrets that this is only underlined and not clearly stated. The role of non-formal and informal learning and its providers such as civil society organisations needs to be acknowledged for offering rich, various and empowering learning experiences. The Education and Training Monitor 2012 mentions that “as the level of formal skills increases, employers will need to screen applicants also on the basis of their non-formal skills and competences. Hence a perfect match in terms of level of a job seeker’s educational attainment and the formal skills demanded by an employer is likely to become a weaker guarantee of employability.” In this line EUCIS-LLL welcomes the Communication’s recommendation to improve the assessment, recognition and validation of skills in

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and outside education systems and calls Member States to set up validation systems by 2018 as stated by the Council Recommendation on Validation of December 2012.

Yet even though many efficient tools have been developed, there is still a long way to go to coordinate them and build comprehensive lifelong learning strategies. EUCIS-LLL thus fully supports the need to create a European Area of Skills and Qualifications and more synergies between EU tools and frameworks. It reminds the need to involve those who are using these tools and frameworks directly in this reflection – institutions and educational actors alike.

2) **Open and distance learning is more than a technological challenge**

If learning outcomes recognition contributes to increasing people’s life opportunities and create open, flexible environments, the potential of OERs and ICT should not be forgotten as the Communication rightly points out. Teachers, trainers and educators have a key role in developing innovative teaching methodologies and supporting this shift. ICT and OERs are also a powerful tool to develop many transversal competences, support the cultural shift to learner-centred systems and broaden the access to learning via distance learning or e-learning. Yet EUCIS-LLL warns against reducing the debate on open and flexible learning to a technological challenge. Personalised learning environments and tailored solutions shall be the ultimate goal to improve the learning experience quality and efficiency. EUCIS-LLL would also like to stress that there is still little material available today. The Communication does not mention major barriers such as language or copyrights that seriously limit the development of OERs. What should the EU do to address them? Who is responsible for developing OERs?

**Rethinking Funding and Partnerships**

1) **Giving to education the necessary financial means to build competitive knowledge societies**

EUCIS-LLL gives a warm welcome to the Commission’s call to make further investment in education and training and stop national budget cuts, in line with the 70% budget increase proposed for the future EU funding programme 2014-2020. It particularly appreciates the recommendation for further concentration and prioritisation of the next European Social Fund to sustain investment in education. Education and training cannot contribute to the EU recovery strategy without a substantial budget. Studies have shown that educated individuals are highly profitable for society. Indeed, achieving the EU2020 benchmark on tertiary education attainment would contribute towards increasing the GDP per capita in the EU by 4%. EUCIS-LLL therefore calls the Council to make political choices in line with their commitment to achieve the Europe 2020 strategy.

EUCIS-LLL also welcomes the Communication’s proposition to “initiate for the first time a debate at EU level with all relevant stakeholders on the benefits of investment in different education and training sectors” and looks forward to enrich this debate with grassroots expertise. Yet efficient investment goes hand in hand with sustainable structures of dialogue and EUCIS-LLL warns against cutting operating support to European civil society organisations in the new EU education, training, youth and sports funding programme.

2) **Implementing a genuine partnership approach**

Civil society organisations at national, regional and local levels contribute to the acquisition and development of basic and transversal skills for all, and are enablers of a paradigm shift towards a learning

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5 See EUCIS-LLL Press release on Validation, 12 December 2011, Brussels and EUCIS-LLL “LLL-Mag #1” on validation

6 See EUCIS-LLL position paper on the ESF 2014-2020

7 See EUCIS-LLL and Coalition advocacy on Erasmus for all
outcome approach, of social innovation and inclusive education. Like many other relevant educational stakeholders, they have **the right and duty to contribute to the debate** on Rethinking Education and should be actively involved and listened to. Yet the participation in EU democratic life underlined in Article 10 of the Lisbon Treaty is hindered by the lack of information and ownership on EU action: a 2011 EUCIS-LLL survey has highlighted that 67.4% of respondents (mostly national, regional or local civil society organisations) did not know very well or not at all the Education and Training 2020 Strategic Framework. Therefore EUCIS-LLL welcomes the Staff Working Document on “Partnerships and Flexible Pathways for lifelong skills development”. EUCIS-LLL calls EU institutions to **show real political will** and ask them to mainstream more elements of this document in the Communication itself. Indeed, while the Staff Working Document emphasises that “weak communication and cooperation between stakeholders representing different relevant policy fields is a major source of policy failure”, the Communication mostly recommends cooperation between education and business. This shows again a utilitarian vision of education and the stakeholders’ spectrum needs to be enlarged through genuine, broad consultation mechanisms and fora as the Staff Working Document rightly proposes. In this line EUCIS-LLL has conducted a research on the **feasibility setting up National Stakeholders’ Forums** which shows that debates need to take place at national and local levels on European cooperation in education and training.

The Document also states that “**effective partnerships and cooperation require strong and sustainable coordination structures and a shared vision among stakeholders**” and obviously reflect the need for a **structured dialogue in the field of education and training** for which EUCIS-LLL has been advocating for. In that sense the Document says that “while public authorities have a leading role in the design and implementation of lifelong learning policies this cannot be done effectively without involvement and cooperation with non-governmental stakeholders”.

Rethinking Education must be a collaborative endeavour and it is time to work together…

For more information, please contact EUCIS-LLL secretariat: **info@eucis-lll.eu**

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**Who is EUCIS-LLL?**  The European Civil Society Platform on Lifelong Learning (EUCIS-LLL) brings together 31 European organisations working in education and training. Together, they cover all sectors of education and training including networks for primary, secondary and higher education, vocational education and training, adult education and popular education. Together they represent millions of students, school heads, parents, human resources professionals, teachers and trainers, reaching out to hundreds of millions learners all over Europe and beyond.

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8 EUCIS-LLL “Survey and feasibility study on National Stakeholders’ Forums”, May 2012