



EUROPEAN
COUNCIL FOR
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EDUCATION

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Statement on the European Education Area by 2025

Since its founding in 1991, the [European Council for Steiner Waldorf Education](http://www.ecswe.eu) has actively contributed to the development of the European dimension of education. Our pedagogical approach and curriculum framework have been disseminated transnationally from the very beginning and **we therefore warmly welcome the European Commission's initiative to realise a European Education Area (EEA)**. From the perspective of an independent education provider that offers an alternative pedagogical approach for 190.000 pupils, in 802 schools, in 29 European countries, we see both **opportunities and risks** connected to the implementation of the EEA and would hereby like to highlight both our hopes and concerns.

General recommendations

More stakeholder involvement on the EU and on the national levels

The Commission has shown their intent with the European Education Area for involving stakeholders both in its creation and implementation. This is apparent from the involvement of representatives of independent schools, non-formal education providers, and other non-governmental bodies in the European Commission's Working Groups, experts groups, and from the involvement of those stakeholders in the European Education Summit, the EEA mid-term review event, and the co-organisation of the Education Stakeholders' Forum together with the Lifelong Learning Platform.

Still, these stakeholders are not sufficiently involved in the High Level Group on Education and Training. This is unfortunate and should be reconsidered, as civil society stakeholders should be seen as the driving force for ground level implementation of the EEA, which can only happen if they are involved in the decision-making processes and can influence the design of the EU recommendations and guidelines in the field of education.

While respecting the Member States' subsidiarity, we believe that the EU can still do a lot to prompt Member States to follow its example of education stakeholder involvement. Namely, even though many do not, some EU countries already include experts from independent school associations and/or Steiner Waldorf school associations into their committees or working groups on the ministry, regional, or local government level. They consult our schools and/or other non-governmental schools when revisiting the state curricula, inspection plans, assessment approach, digital



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media approach, early childhood education, etc., because non-governmental schools often have space for innovative, more holistic, more learner-centred approaches, which are in line with the [Council Recommendation to Pathways to School Success](#) and most other EEA initiatives. If the voices of those, and other civil society stakeholders, were present in the decision making processes of all Member States, the implementation of the EEA would be much more realistic.

The European Semester process could also benefit from defining sturdy criteria for measuring the scope and quality of national level stakeholder involvement during the implementation stage for the country-specific recommendations. Funding provided to Member States in return for successful implementation should therefore be made conditional on such broad involvement taking place and stakeholder inputs being sufficiently reflected in national level implementation.

Education systems as part of the wider social reality

Prompted by the immeasurable impact on the transformation of education that the COVID-19 pandemic had, we also must recognise that the ongoing violent conflicts in our neighbouring countries and regions heavily influence the school life of our pupils and their mental health and well-being.

“People centred policies are more vital than ever” (EC Communication) - We agree. To properly deal with the unfortunate challenges that Europeans are faced with, **we need policies centred on trauma relief and inclusion, putting relationships and well-being first**. In this regard, we would like to encourage EU-wide stakeholder involvement campaigns at all system levels to ensure the implementation of the Commissions’ recently adopted [guidelines on Wellbeing and mental health in school](#).

When discussing the **use of digital technologies** in education, we encourage a change of mindset, shifting the focus away from the need to adapt to digital transformation towards a **critical assessment of opportunities and risks** that digital technologies offer in a given learning context and at a given age. Digital technology should only be used when there is clear evidence that it sustainably improves the overall learning experience and learning outcomes for the pupils involved compared to its analogue counterpart.

The task of education should not be to simply follow the newest technological trends that appear in our society, but to carefully judge the usefulness, weighing risks and benefits, of any technology for the betterment of learning opportunities in each classroom and for every child. This selective and careful approach should also be recognised as a principle in policy design within the framework of the European Education Area, as it is done by UNESCO in its 2023 [Global education monitoring report on technology in education](#).



Rethinking the EU Benchmarks and tracking progress

While the overall experience with EU-level benchmarking appears to be positive, we encourage a more critical and systemic view on its impact.

- With regards to the envisioned **goal of 98% ECEC participation from age 3 onwards**, we are highly concerned that the mandatory and broad participation in ECEC will lead to national governments putting even more pressure on ECEC settings to introduce academic content from an early age. Unless impossible within the legal framework of a country, formal instruction in reading and writing in Steiner Waldorf settings typically begins in primary education (age 6-7). From our perspective, the focus in early years education should be on developing physical, social, and pre-intellectual skills, prioritising free outdoor play and offering manifold activities in the fields of arts and crafts to help children lay healthy foundations for academic learning in formal education. We therefore encourage **combining the communication on this benchmark with a plea for pedagogical freedom and autonomy and against setting any academic standards at ECEC level**.
- While fully supporting the **goal of bringing the share of low-achieving 15-year-olds in reading, mathematics, and science below 15%**, we believe that basic skills are best developed by means of a **holistic curriculum** that reflects the **developmental stages** of learners and **balances academic learning with a high degree of experiential learning**, arts, crafts, and movement. This fosters the healthy physical, neurological and social development of children that allows them to thrive in the academic field. We consider this to be of particular relevance to children from disadvantaged backgrounds. Steiner Waldorf schools can in this regard offer their experience of implementing a holistic approach to education.
- We suggest to **rethink the introduction of the goal of bringing the share of low-achieving eighth-graders in computer and information literacy below 15%, because**:
 - A certain level of the generic **basic skills** (literacy and numeracy) is a **prerequisite** for the meaningful use of digital technology in classrooms. In our opinion, a **sequential approach** (basic skills first, digital competence later) would increase the likelihood of reaching the benchmark for basic skills development. The added pressure of a benchmark for computer and information literacy already in the eighth grade is therefore counterproductive.
 - Without a holistic educational approach that **distinguishes digital skills from basic skills**, the measurement of digital skills in 8th grade will inevitably create pressure to set ambitious standards for a narrowly



defined digital competence development in primary education. Such a development would be detrimental to educational quality at large.

- To better understand these interdependencies and in line with a positioning of the European Parliament of 2020, we would like to emphasise the **need for multi-disciplinary and longitudinal research** “into the various impacts of digital technologies on the education and development of children, linking education sciences, pedagogy, psychology, sociology, neuroscience and computer science” (EP, [2020/2135\(INI\)](#), Art. 13).
- To better understand our views on digital education in schools, please also read our position paper on [Digital Education Action Plan 2021-2027](#).
- We wholeheartedly agree with the **goal to bring the amount of people aged 20-24 with at least an upper secondary qualification to > 90%**.
 - We are convinced that this is most sustainably achieved in education systems that value **diversity of pedagogical approaches**, that offer **high degrees of school autonomy and pedagogical freedom**, and that allow implementing a development-oriented curriculum and learner-centred approach at school level.
 - We are convinced that an over-emphasis on accountability, high-stakes tests, and rigorous academic standards in primary and early secondary education might be counter-productive in this regard and limit the chances of academic progress for learners from disadvantaged backgrounds. In the interest of better equity and inclusion, we advocate for more balance between trust and accountability.

Educational quality

Building on to the outcomes of the WG on Pathways to School Success and the expert group on well-being in school

The European Council for Steiner Waldorf Education is an active member of the Working Groups Schools sub-group on Pathways to School Success, and we also actively follow the work of the sub-group on Learning for Sustainability, the Working group on Digital Education: Learning, Teaching and Assessment, and the expert group on Well-being in school, through our membership in the Lifelong Learning Platform.

We warmly welcome the outputs of these groups, especially the [Council recommendation on Pathways to School Success](#) and the [guidelines on Wellbeing and Mental Health in School](#). We are also aware that the implementation of these recommendations highly depends on the political will in each Member State, or its administrative regions. Thus, we find it imperative that the **Commission pairs the**



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intention to implement these recommendations with an attractive budget as a clear incentive for all Member States to design their policies and implementation strategies, so that the recommendations find their way to the ground level, to the pupils in as many classrooms as possible across the EU.

We also recommend that the Commission recognises the **role that the independent schools are playing in ensuring pluralism in education** that enables students with diverse learning needs to find the school that best fits their needs. Financially supporting those already existing schools will instantly allow more pupils to find their own pathway to school success, while lowering the drop-out rates.

Call for more formative and personalised assessment practices

Concerning the assessment of basic skills and competences, we encourage the wider use of personalised assessment practices and more frequent engagement of students in peer-evaluation and self-reflection. Our views on this matter appear to be well aligned with the [Commission report on the Future of Assessment in Primary and Secondary Education](#) (see pp. 45-48 and 50-51). Our organisation is making an active contribution to the debate on the future of assessment as was demonstrated in 2021 by publishing a collection of 20 innovative assessment practices from across the EU, in our book [Assessment as Dialogue](#).

Acknowledge the importance of transversal skills

We support the sustainable development of transversal skills such as “critical thinking, entrepreneurship, creativity and civic engagement” by means of “transdisciplinary, learner-centred and challenge-based approaches” (EC Communication). We believe this is best achieved with a holistic curriculum that promotes rich learning experiences and creates an academically, socially, and physically challenging and stimulating learning environment.

Stop labelling digital competences as part of basic skills

We question the frequent labelling of digital competence as a basic skill, because a certain level of basic skills (at least literacy and numeracy) is fundamental for the meaningful use of digital technology in classrooms. This is also acknowledged in the [European Parliament report on shaping digital education policy of March 2021](#) (Art. E).

Based on this understanding and on the aims of the [Digital Competence Framework for Citizens 2.2](#), we have put together a project consortium around the task of developing an internationally adaptable holistic media education guide for formal education settings, including a curriculum and teacher and parent training. The Erasmus+ co-funded [HERMMES project](#) focuses on making digital media literacy a reality for all at the end of their schooling. We thus consider analogue media skills (such as talking, listening, drawing, reading, writing, etc.) as the prerequisite for later development of digital skills, and include the development of those skills into our media curriculum. Such approach minimises digital risks, while maximising benefits of the productive usage of digital tools, once the pupils are developmentally ready for such use. We



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highly recommend that the Commission and all Member States of the EEA seriously consider this approach as well, especially in connection with the decline in basic skills evident from PISA 2022.

We support the promotion of learner mobility

We welcome the strong emphasis of the EEA on learner mobility. Alternative pedagogical approaches such as Waldorf and Montessori education have developed their own curriculum framework and disseminated it widely across the globe. As a result, numerous schools across the continent can easily associate with one another, and learner and teacher mobility are therefore greatly appreciated and facilitated within the Waldorf system. We believe that the EU could learn from this positive experience and promote more flexibility and diversity.

From our perspective, this also requires breaking down the artificial barriers between national education systems and to allow for better transnational participation in formal and non-formal education programmes delivered in other EU member states or other signatory countries of the Lisbon Recognition Convention like e.g. New Zealand, Australia, Canada, or the U.S.. This should also include the facilitation of mutual automatic recognition of all upper secondary school diplomas earned in such a transnational manner, rather than blocking such attempts for political reasons and to the detriment of learner mobility.

Fostering language learning and multilingualism

In our schools, we strongly support learning two foreign languages from class 1. We are therefore fully supportive of a stronger emphasis on language learning and multilingualism.

Inclusion and gender equality

Equal access to different pedagogical approaches is crucial and requires public funding

We encourage the EU to better coordinate the funding of the independent school sector in Europe. By offering adequate (=equal) financial support to independent schools as they do to public schools, Member States would not only contribute to fully implementing [article 14.3 of the ECFR on the right to education](#) (right of parental school choice) but also effectively contribute to a more inclusive educational system that gives equal chances to learners from disadvantaged backgrounds. The discriminatory funding schemes and regulations in many education systems still prevent many families from freely exercising their right of parental school choice.

In this context, we refer to the paragraph 76 of [the European Parliament resolution of 12 June 2018 on modernisation of education](#), that “encourages, with regard to increasing inclusiveness and ensuring freedom of educational choice, the provision of adequate financial support for schools of all categories and levels, both state schools and not-for-profit private schools, provided the curriculum offered is based on the



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principles enshrined in the Charter of Fundamental Rights of the European Union and complies with the legal systems and rules and regulations regarding the quality of education and the use of such funds in force in the Member State concerned”.

A high degree of diversity of school choice also ensures better mobility of independent school students within the EU as it enables them to access the same educational approach in different countries. It is hard to understand and seems discriminatory why exercising the right of parental school choice costs a considerable amount of money in some, while nothing in other Member States. School choice should never depend on the wallet of the parents or their geographical location.

Green and digital transitions

Steiner Waldorf schools have always promoted **sustainability and ecological studies** (see more [here](#)). We therefore wholeheartedly support the EU’s strategic initiative to foster the green transition. With regards to the digital transition, we advise on promoting an age-appropriate and development-oriented approach that respects school autonomy in curriculum design and allows schools to define their own digital education policies.

Promoting a green education infrastructure

We welcome the focus of the EEA on environmental sustainability. Throughout their history, Steiner Waldorf schools have strived to offer a sustainable learning environment and a green learning infrastructure. Our school gardens help learners to develop a close relationship with the natural world and help them to better **understand the importance of living in synergy with the environment**. This is why we have also chosen sustainability as a focus topic in the work plan of our organisation for 2024.

Teachers and trainers

Independent teacher trainings contribute to tackling teacher shortages in Europe

We call on policy makers to allow independent school providers to **run their own academic teacher training** and tailor their training programmes to their specific curriculum. In many countries, this will attract a wider group of students than with the current one-size-fits-all approach.

Enhance the attractiveness of the teacher profession by systematically recognising diversity of pedagogical approaches

In order to provide more diversity in teacher training and increase the motivation of different target groups to become teaching professionals, **provide for better recognition of independent teacher training programmes** and the skill sets that



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teachers acquire there. Diversity in teacher training will greatly contribute to offering heterogeneous groups of learners access to high quality education tailored to their specific learning needs.

Provide equal funding to independent teacher training programmes

In the interest of inclusiveness and diversity, all training **candidates should be able to freely choose between different training opportunities**. Independent teacher trainings should therefore have equal access to public funding.

Higher education

Mutual automatic recognition should also apply to independent school diplomas

Throughout the EU, national governments should better reflect the needs of the independent school sector regarding the **development and mutual recognition of independent secondary education qualifications**. The Parliament should therefore encourage the Member States to fully recognise such qualifications and enable them to provide university entrance, whenever the achieved learning outcomes can be considered equivalent to those of the established secondary education qualifications. Therefore, the Lisbon Recognition Convention should be implemented in a less restrictive way.

Brussels, 3 July 2024