



# Contribution of COFACE Families Europe to the EU public consultation on the new Action Plan to implement the European Pillar of Social Rights

September 2025

## Key messages

1. Strengthen the family dimension of the Union of Skills, by investing in training, skills and inclusive workplaces
2. A strong Gender Equality Strategy post 2025
3. Ensure the effective implementation by Member States of the EU Work-life Balance Directive
4. Boost implementation of the European care strategy and investments in quality ECEC
5. Step up implementation of the European Child Guarantee by addressing poverty through family support and cross-sectoral coordination
6. EU household surveys must further uncover the realities of care relations inside and between households

## 1. Strengthen the family dimension of the Union of Skills, by investing in training, skills and inclusive workplaces

Principle 1. Education, training and life-long learning, Principle 17. Inclusion of people with disabilities

- **The family perspective is often neglected in EU education initiatives.** Everyone has the right to education, training and lifelong learning, as enshrined in the European Pillar of Social Rights. Yet, many people in Europe cannot enjoy this right because systemic barriers make it difficult to access education and training. These obstacles disproportionately affect parents and family carers and, in particular, those that may be at increased risk of social exclusion and poverty, including single mothers, parents caring for children with disabilities, and low-income families. While EU education and training policies recognise the importance of diversity and inclusion, the family perspective is often neglected. This translates into less effective programmes, excluding those who may benefit the most from training and lifelong learning. It would be important to introduce a 'Family Test' to ensure that all education and training programmes funded or promoted by the EU are accessible by design for families, parents, and caregivers. Including the family perspective in EU education and training policies has the potential to remove substantial barriers that still hinder the enjoyment of the right to education, training and lifelong learning for many.<sup>1</sup>

<sup>1</sup> [European Association for the Education of Adults » Making Education Accessible and Inclusive for Families, Parents and Family Carers: COFACE and EAEA call for a 'Family Test' in EU Education and Training Policies](#)

- **There are too many children with disabilities still excluded from participating in mainstream education** and EU initiatives are having little to no impact on the cultural, political and practical transformation of the education systems which are needed to accommodate the different requirements and identities of all students including of those with disabilities. This is the case from the earliest age with a need for more inclusive early childhood education and care. Measures should be taken to boost childcare and teacher workforces and education systems, for instance through the Technical Support Instrument of the European Commission and making clear Country Specific Recommendations on inclusive education in the framework of the European Semester. A much stronger focus on inclusive education and non-discrimination should be prioritised under the second phase of the European Disability Strategy 2021-2030, and its upcoming new flagship initiatives.
- **Invest in skills and training programmes tailored to the needs of vulnerable populations.** Instead of focusing on training for highly skilled individuals only, training and education initiatives should be available to all disadvantaged groups on the labour market, including people with health limitations, to mitigate the negative effects of existing disadvantages.<sup>2</sup> The Action Plan on Basic Skills includes a Basic Skills Support Scheme, to be piloted in 2026, which will focus on early identification of learning needs and provide individualised support throughout a child's educational journey. Schools will be encouraged to develop improvement plans, including tutoring, mentoring, and personalised learning pathways. These measures are designed to ensure no child leaves compulsory education without core competencies. A central feature of this scheme is the creation of professional development opportunities for teachers working with pupils with special educational needs and/or disabilities. The aim is to ensure a stronger connection between educators, students and parents: supporting the inclusion by promoting a stronger collaboration between stakeholders is a priority.<sup>3</sup>
- **Tackling and preventing school bullying as a driver of inclusive education.** Wherever possible, the local community should be involved in initiatives to promote inclusive societies. In the school environment this means ensuring that families have access to accurate information and support if needed, establishing and maintaining communication channels. As regards prejudice and discrimination, instances of bullying against children from diverse families remain. The lack of representation of diverse family forms in curricula and in education materials is misleading of the reality of families today. Building on the results of the 2023 European Year of Skills and the future EU Action plan on cyber-bullying, the EU should implement comprehensive anti-discrimination measures and sensitivity training for educators, including intersectional approaches in teacher training, to help build communities where all children are treated equally regardless of their family setting, ethnicity, disability, gender, and sexual orientation.
- **Bridge the digital divide through digital upskilling.** Invest in inclusive digital workplaces, including digital upskilling for older workers, people with limited education, people with health issues and disabilities. Digital deprivation and unequal access to digital technologies persist. Research has documented that even if digital technologies are transforming the lives of most children and young people, some are at a high risk of being left behind. 5.4 percent of children in Europe are digitally deprived.<sup>4</sup> Disparities in access to technology and digital skills persist across Member States and socioeconomic groups. Continued efforts are needed to bridge these gaps and ensure equitable access to education and digital resources for all, providing more accessible and inclusive upskilling opportunities for all skill levels and backgrounds.

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<sup>2</sup> Ona Valls, Arianna Vivoli, Robin Samuel and Elisabeth Ugreninov, [Mapping labour market attachment among vulnerable groups in European countries: health-related and intersectional barriers before and after COVID-19 pandemic](#), 2025, p. 23-25.

<sup>3</sup> [European Union Action Plan on Basic Skills: the family dimension](#) | COFACE Families Europe

<sup>4</sup> [Digitally deprived children in Europe](#) | DigiGen

## 2.A strong Gender Equality Strategy post 2025<sup>5</sup>

Principle 2. Gender equality, Principle 9. Work-life balance

- **Close the gender care gap.** Boost care services and creating synergies with the European Care strategy, recognising and supporting long-term caregivers (still mostly women), as well as the European Child Guarantee and monitoring European 2030 targets on early childhood education and care.
- **Close the gender employment gap** by addressing discrimination in hiring and building family-supportive workplaces: through Corporate Sustainability Reporting monitoring of the gender pay gap, the percentage of women in higher positions and parental leave taken up by fathers. Indicators on work-life balance and gender equality should be monitored closely by companies to implement strategies which enhance flexible working arrangements and reduce barriers for fathers to use parental leave.
- **Use a multi-generational lens.** Approach gender equality through a multi-generation lens and consider measures targeting different generations from children to older persons.
- **Build intersectionality** into the design of the new strategy: with family diversity in mind and acknowledging realities of women at the intersection of situations which may cause vulnerabilities such as the birth of a child, poverty, disability, racism, and discrimination.
- **Create more inclusive labour markets by combating discrimination in hiring.** PATHS2INCLUDE research found that gender and ethnic discrimination remain prevalent across Europe which limits equal access to employment opportunities.<sup>6</sup> Combat discrimination in hiring of groups in vulnerable situations by ensuring the full implementation of Directives 2000/78/EC on equal treatment in employment and occupation, 2000/43/EC of 29 June 2000 implementing the principle of equal treatment between persons irrespective of racial or ethnic origin, by encouraging organisations to adopt concrete, actionable diversity policy measures and expanding flexible work arrangements to facilitate work-life balance and prevent care-based discrimination.

## 3.Ensure the effective implementation by Member States of the EU Work-life Balance Directive

Principle 2. Gender Equality, Principle 9. Work-life balance, Principle 18. Long-term care

- **Ensure full implementation of the EU Work-life Balance Directive (WLB Directive).** It is a powerful tool to push for higher standards in family policies in terms of family leaves and flexible working arrangements for parents and carers. According to the recent report of the European Equality Law Network, up to 30 June 2023 only one Member State (the Netherlands) did a more or less satisfactory job in terms of transposition, while the rest of the 26 Member States had important gaps in one or several areas.<sup>7</sup> COFACE believes that Member States must go beyond the standards of the directive and need to facilitate take-up of family leaves by providing adequate pay, non-transferable leaves and

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<sup>5</sup>See COFACE's media statement for International Women's Rights Day 2025: <https://coface-eu.org/time-for-a-game-changing-eu-gender-equality-strategy-post-2025/> and COFACE's response to the EU public consultation on the future EU Gender Equality Strategy 2026-2030 [COFACE Families Europe contributes to the Gender Equality Strategy 2026-2030 public consultation | COFACE Families Europe](https://coface-eu.org/families-europe-contributes-to-the-gender-equality-strategy-2026-2030-public-consultation/)

<sup>6</sup> Buttler et al., *How context shapes care-based discrimination in hiring: evidence from a cross-national factorial survey experiment*, 2025.

<sup>7</sup> European network of legal experts in gender equality and non-discrimination: The transposition of the Work-Life Balance Directive in EU Member States (II): Considerable work still to be done, 7 March 2024: <https://www.equalitylaw.eu/downloads/6048-the-transposition-of-the-work-life-balance-directive-in-eu-member-states-ii-considerable-work-still-to-be-done>

flexible take-up for women and men to combat gender stereotypes regarding family roles.<sup>8</sup> Based on the Commission's planned 2027 report on the implementation of the WLB Directive by Member States, legislate further on work-life balance if necessary – for instance, through a flagship initiative to close the childcare gap in Europe.<sup>9</sup>

- **Close the childcare gap in Europe.** The childcare gap remains one of the most pressing challenges facing new parents across Europe today. This gap arises following the birth of a child, when well-paid parental leave has been exhausted, but access to state-supported full-time Early Childhood Education and Care is not yet available. During this critical window, families are left navigating the complexities of childcare without adequate support, often facing difficult decisions about work, finances, and caregiving responsibilities. All these options place a significant financial burden on families, exacerbating existing inequalities. Only 5 Member States (DK, EE, FI, SI, SE) have closed it.<sup>10</sup> This demands urgent action.<sup>11</sup>
- **Promote a healthy work-life balance in the digital age.** In this regard, legislate on right to disconnect and fair telework on a policy level.
- **Build health-promoting workplaces.** To address older workers' challenges, policies should have a stronger focus on creating health-promoting workplaces: health screenings, active living and ergonomic approaches can help keep aging workforces healthy and engaged. Council Directive 89/391/EEC harmonises occupational health services across EU member states for better health and safety standards, but its implementation varies at a national level. The new action plan should establish health-promoting workplaces enabling older workers to remain in employment longer and reduce their economic vulnerability, by supporting the implementation of Council Directive 89/391/EEC to mainstream occupational health services across Europe.

#### **4.Boost implementation of the European Care Strategy and investments in quality ECEC**

Principle 11. Childcare and support to children, Principle 12. Social protection and Principle 18. Long-term care

- **Address the needs of informal carers.** Although the needs of informal carers have been included in the 2022 *Council Recommendation on access to affordable high-quality long-term care*, and important new indicators related to their legal recognition, identification and support have been integrated in the recently adopted monitoring framework for the recommendation, there still appears to be a lack of strong EU supporting and coordinating policies when it comes to answering the needs of informal carers. It is important to develop new initiatives aimed to define more precisely the goals that were set in the Council Recommendation, as well as to foster a common understanding of effective and efficient good practices to achieve them, along with a greater technical and financial support from the EU. This would be an important commitment to meeting the needs of informal and family carers in the coming years.

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<sup>8</sup> See COFACE's 2022 report on the transposition of the EU Work-life Balance Directive: <https://coface-eu.org/eu-work-life-balance-directive-transposition-in-action-a-mixed-picture/>

<sup>9</sup> Policy Priorities for Family Resilience, 4 February 2025 <https://resilience.eu/publications/policy-priorities-for-family-resilience>

<sup>10</sup> [Factsheet on Childcare gap in the European Union | COFACE Families Europe](#)

<sup>11</sup> [Can the Action Plan for the implementation of the European Pillar of Social Rights deliver tangible results for Europe's families? | COFACE Families Europe](#)

- **New ambitious action plan for Long-term care.** As part of the European Care Alliance, COFACE calls on the European Commission to remain committed to all the different dimensions of the European Care Strategy for the current Commission mandate, as well to promote dialogue, transparency and the sharing of knowledge through the setting up of a European long-term care platform. Crucial dimensions to be addressed during the mandate include : strengthening and supporting health promotion and prevention to reduce the increase of care needs, supporting the development of high-quality support services and supporting measures for informal carers, tailored to their needs, supporting care service providers in delivering rights-based, high-quality, accessible, and affordable care, addressing workforce shortages, and improving working conditions. (See in the Annex below the Common Position of the European Care Alliance calling for an ambitious Care Strategy.)
- **Boosting investments in quality early childhood education and care is urgent.** This is not only needed to ensure that children have a great start in life via educare opportunities but also to ensure the 2030 European ECEC targets are achieved. Special attention must be paid to several aspects, including but not restricted to: employing qualified personnel and offering them satisfactory pay, good working conditions, regular in-service training, and career development opportunities; making sure that the ratio of babies and toddlers in playgroups relative to qualified practitioners is appropriate in every day-care and preschool centre, and includes a group size threshold; creating strong educational partnerships between parents/guardians and ECEC practitioners (including both care providers and management) that focus on the best interests of the child and acknowledge the expertise that parents have regarding their own children, regardless of their family background creating a continuum of care; ensuring that educational guidelines are in place, emphasising targeted pedagogical approaches based on observation and responsiveness to children's specific needs, as well as the importance to reflect and promote diversity, creating equitable opportunities for all.<sup>12</sup>

## **5.Step up implementation of the European Child Guarantee by addressing poverty through family support and cross-sectoral coordination**

Principle 11. Childcare and support to children, Principle 20. Access to essential services

- **Cross-sectoral coordination.** Adopt a Council recommendation to integrate education, health, housing, and transport services (for instance via family hubs or centres), mirroring the Child Guarantee's holistic approach. This would streamline access for vulnerable families while boosting EU competitiveness/sustainability.
- **Support structured peer exchanges between national authorities on setting up comprehensive family support services.** Family Support Services should be universally available and range from general to highly specialised support. There should be national-level frameworks for family support services premised on local level provision. Family support services should be guided by a holistic approach.<sup>13</sup> This should also be supported by strong ESF+ and ERDF investments to roll out family centres and further strengthen implementation of the European Child Guarantee.<sup>14</sup>
- **Integrate a family dimension in the framework of energy poverty policies.** Ensuring that the selection criteria for energy-related supports and benefits include resources for the whole family considering

<sup>12</sup> See COFACE's Position Paper: The Family Dimension of improving early childhood education and care services <https://coface-eu.org/position-paper-the-family-dimension-of-improving-early-childhood-education-and-care-services/>

<sup>13</sup> <https://reusilience.eu/publications/policy-priorities-for-family-resilience>

<sup>14</sup> Roadmap for boosting the rights and resilience of European families — rEUsilience

for instance, the number of people or children to support in the household. EU policies and Member States must recognise the unique challenges faced by these families in vulnerable situations and implement effective measures to alleviate their energy poverty. This includes developing tailored support programmes, by promoting energy efficiency and the use of renewable energy sources, investing in housing measures and public transport and targeted subsidies for low-income households.<sup>15</sup>

## **6.EU household surveys must further uncover the realities of care relations inside and between households.**

Principle 9. Work-life balance, and Principle 18. Access to long-term care.

- **Most households live with family members, but there are also family relations happening beyond the household.** Research of the rEUsilience Horizon Europe project shows that most EU surveys<sup>16</sup> are blind to these realities and do not see that support dimension of family lives. With such data gaps, social policy can potentially have the reverse effect and perpetuate inequalities and discrimination. In a context of the ageing population in Europe and the diversity of families, it is essential to capture care obligations outside the household such as caring for older family members, co-parenting and more.
- **Improve monitoring using the European families-in-households typology.** Although most EU social surveys have ready-made indicators (/variables) of household and/or family type, rEUsilience research indicates it is possible to improve on those classifications. The improvement predominantly relates to a more explicit distinction between “household” and “family”. This allows for a better understanding how different family types live across various household types. As a first step towards disentangling families and households, the rEUsilience consortium has constructed a collection of family- and household- types using a selection of European social surveys.<sup>17</sup>
- **Improve monitoring and understanding of unpaid care work, namely the extent and intensity of care for adult relatives or other close persons in European households.** Within the Indicators Subgroup of the Social Protection Committee, a monitoring framework in the field of long-term care has been developed, with a focus on collecting comparative data on the availability, adequacy, and quality of LTC services.<sup>18</sup> What is absent however, is comparative and high-quality data on adult care provision to family members both within and outside carers’ households and the impact of this type of care on the carers’ employment outcomes. rEUsilience research shows that there is a clear need for high-quality, comparative data that would systematically monitor the amount of care family members provide to their relatives and whether or how these care responsibilities affect their working lives. Hence a blueprint for an EU-SILC ad hoc module concerning ‘Adult Care & Work’ was developed which would allow for better monitoring and understanding of the extent and intensity of care for adult relatives or other close persons in European households.<sup>19</sup>

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<sup>15</sup>See COFACE’s 2023 policy brief on energy poverty: <https://coface-eu.org/energy-policy-brief-2023/>

<sup>16</sup> The following data sets were analysed by the rEUsilience project: European Social Survey (ESS, wave 2010), the Household Budget Survey (HBS, wave 2010), the European Union Statistics on Income and Living Conditions (EU-SILC, wave 2016), the European Quality of Life Survey (EQLS, wave 2016), and the Household Finance and Consumption Survey (HFCS, wave 2017)

<sup>17</sup> See the rEUsilience “Families-in-Households” typology: [The rEUsilience project | COFACE Families Europe](#)

<sup>18</sup>Social Protection Committee and European Commission (2025), Monitoring Framework on the Council Recommendation on access to affordable high-quality long-term care. Available [online](#)

<sup>19</sup> Bartova, A. and Van Lancker, W. (2025), Adult Care & Work: Blueprint of an EU-SILC ad hoc module. rEUsilience working paper series: 15. Available [online](#)



## ANNEX



August 2025

### **Common position on Principle 18 of the European Pillar of Social Rights: Time for an ambitious action plan for long-term care.**

*The European Care Alliance is a group of civil society organisations representing and supporting persons in need of care and their families, service providers in the long-term care sector, and social partners. Through this document, in the context of the public consultation on the new action plan to implement the European Pillar of Social Rights, we update and reaffirm our common position of 26 March 2025.*

In December 2022, the EU took a decisive step towards addressing the long-term care crisis, a critical issue that will determine the quality of life of a growing part of its population. It adopted the [Council recommendation on long-term care](#), based on the Commission's Communication for a European Care Strategy.

The recommendation urges Member States to enhance the affordability, social protection, accessibility and quality of long-term care services for all people who need it. Additionally, it emphasises the importance of supporting informal carers, improving working conditions of professional carers, including live-in care workers and domestic workers, as well as addressing the shortage of the long-term care workforce.

Since then, all Member States presented [national reports](#) on their proposals for the implementation of the recommendation in September 2024, demonstrating their continued support for the goals adopted by the Council.

**However, the mission letters of the new European Commission do not fully reflect this ambition.** Long-term care is mentioned only from the perspective of workforce shortages – a critical dimension within a more multifaceted issue. Ms Mînzatu has called for a European Care Deal during her confirmation hearing, and we want to support this wider ambition.

It remains crucial to increase the availability and affordability of rights-based, person-centred, quality care, particularly home care and community-based care, especially in the light of demographic developments and the transition away from institutional care. The need for care and support should be resolutely acknowledged as a social responsibility, rather than a private one, as it impacts society as whole, and both influences and is influenced by factors such as gender, employment, exposure to physical and mental health risks, poverty, social exclusion and the environment. Therefore, the provision of long-term care, throughout a person's life, should be established as a pillar of social protection in all Member States.

Informal carers - among which millions are women - should be identified, recognised and supported in all Member States, to mitigate the detrimental impact of care responsibilities on their social inclusion, economic situation, health and well-being. Their unpaid and underappreciated labour significantly affects workforce participation, contributing to gender gaps, limited access to social protection, reduced earnings contributing to old-age poverty.

**As civil society organisations and trade unions representing people with disabilities, those supported by care services and their families, informal carers, care workers and cooperatives, service providers for care and services for persons with disabilities part of the social economy,** having supported the European Care Strategy since its inception, we call on the European Commission to incorporate all ambitions of the Care Strategy into its planning for the current mandate:

- **Strengthen and support health promotion and prevention** to reduce the increase of care needs.
- Assist Member States in developing rights-based, person-centred long-term care services across all territories through the **European Semester, European funding and increased flexibility in public spending rules.**
- **Decisive investments supported through EU Funds to ensure that the offer of formal long-term care services matches the growing demand in the population.**
- **Support the development of high-quality support services and measures for informal carers, tailored to their needs.** Legislation should improve the rights to care leave and access to social protection. Qualitative tailor-made support and the provision of support services such as day-care and respite care should be provided. This should lead to improving informal carer's mental health and wellbeing, labour market participation, as well as reducing negative social and health impact of caring, including gender inequality.
- Support **care service providers in delivering rights-based high-quality, accessible, and affordable care,** while enabling them and household employers to hire and retain qualified workers.
- **Revise the Directives on Public Procurement** to ensure that price alone is not decisive, but prioritises value over cost to truly promote quality, social, and environmental considerations
- **Investigate and prevent the causes of abuse and neglect** in long-term care settings.
- In continuation of Executive Vice-President Mînzatu's mission to **address workforce shortages, improve working conditions** by promoting fair wages, skills recognition, and social dialogue in all sectors of the care economy, improving workers' mental health, and fully including vulnerable groups of workers, including domestic workers and migrant workers specifically.
- **Up-skilling and re-skilling of the long-term care workforce** for the provision of person-centred care services. Initiatives such as the [partnership of skills in long-term care](#) need to be strengthened



- **Address undeclared work and exploitation in care** by strengthening oversight and access to remedy, promoting formal employment, including through work permit pathways that promote decent work, and ensuring adequate social protection.
- **Tackle financial speculation in the long-term care sector** where profit-oriented companies benefiting from large investments and often public funding reduce quality to extract undue profit, squeezing out service providers, who genuinely try to provide person-centred, quality care. These include public providers, service providers from the social economy, and care cooperatives.
- Encourage Member States to **support high quality care by recognising the importance of different care and support services, valuing the interest of viable not-for-profit alongside for-profit providers.**
- **Advance gender equality in the care workforce**, notably by improving pay, working conditions and career opportunities.

We reiterate our [\*\*proposal for a European Long-Term Care Platform\*\*](#) as part of the revised Action Plan on the European Pillar of Social Rights to give this policy a tangible framework of monitoring and transparency, with the involvement of all relevant stakeholders, including civil society organisations. The Platform should have an annual meeting similar to the Long-Term Care Forum organised on 12 November 2024 by the Commission.

With this in mind, we stand ready to support the new European Commission in its efforts to meet the needs of over 30 million people in Europe requiring long-term care due to age, disability, or illness, as well as their employees, service providers and families.

### **List of Signatories**

AGE Platform Europe  
 Alzheimer Europe  
 Autism-Europe  
 Caritas Europa  
 CECOP – European confederation of industrial and service cooperatives  
 CESI – European Confederation of Independent Trade Unions  
 COFACE Families Europe  
 EAPN – European Anti-Poverty Network  
 EFFAT – European Federation of Trade Unions in the Food, Agriculture and Tourism Sectors  
 EFFE – European Federation for Family Employment & Home Care  
 EPSU – European Public Service Union  
 ENAR – European Network Against Racism  
 Eurocarers  
 Eurodiaconia  
 EuroHealthNet  
 European Association of Service Providers for Persons with Disabilities (EASPD)  
 European Disability Forum  
 EFSI - European Federation for Services to Individuals  
 Make Mothers Matter  
 Mental Health Europe  
 PICUM – Platform for International Cooperation on Undocumented Migrants  
 UNI Europa Global Union