



Ref.: 2025-01-D-46-en-8

Orig.: EN



Multi-Annual Plan of the European School system 2025-2029 – Update considering the recommendations of the IAS audit on the governance in pedagogy

Approved by the Board of Governors of the European Schools in its meeting
on 15, 16 and 17 April 2026 in Riga (Latvia)

<p>Joint Board of Inspectors Meeting on 11th and 12th February 2025</p> <p><u>Proposal</u> The Joint Board of Inspectors is invited to express its opinion on the proposed Multi-Annual Plan 2025-29.</p> <p><u>Opinion:</u> Subject to the remarks and requests for changes made during the meeting, and which will be sent in written by the Inspectors, the JBI issued a favourable opinion on the Multiannual plan 2025-29. Its opinion will be forwarded to the JTC and to the BC for their respective opinion, and then to the BoG for decision-making.</p>	Ref.: 2025-01-D-46-en-1
<p>Joint Teaching Committee Meeting on 13th and 14th February 2025</p> <p><u>Proposal:</u> The Joint Teaching Committee is invited to express its opinion on the proposed Multi-Annual Plan 2025-29.</p> <p><u>Opinion:</u> The Joint Teaching Committee takes note of all remarks and comments and issues a favourable opinion on the multi-annual plan 2025-29. Considering some additional remarks, the document will be adapted accordingly. The multi-annual plan will be submitted to the Budgetary Committee for opinion and to the Board of Governors for approval.</p>	Ref.: 2025-01-D-46-en-1
<p>Budgetary Committee Meeting on 11th and 12th March 2025</p> <p><u>Proposal:</u> The Budgetary Committee is invited to express its opinion on the proposed Multi-Annual Plan 2025-29.</p> <p><u>Opinion:</u> The Budgetary Committee gave a favourable opinion on the Multi-Annual Plan 2025-2029 with the reservations of the European Commission, Germany, Ireland, Finland and France on the financial impact.</p>	Ref.: 2025-01-D-46-en-2
<p>Board of Governors Meeting on 9th, 10th and 11th April 2025</p> <p><u>Proposal:</u> The Board of Governors is invited to approve the Multi-Annual Plan 2025-29 defining the priorities for the next 5 years.</p>	Ref.: 2025-01-D-46-en-3

<p><u>Decision:</u> The Board of Governors approved the Multi-Annual Plan 2025-2029 defining the priorities for the next 5 years. The Board of Governors agreed that the Multi-Annual-Plan will be reviewed in light of the final 'Mission and Vision' documents, which are supposed to be adopted at the extraordinary meeting in June 2025.</p>	
<p>Mission and Vision of the European Schools</p> <p>Board of Governors <u>Extra-ordinary meeting on 30th June 2025</u></p> <p>Proposal: The members of the Board of Governors are invited to approve the Mission and Vision draft of the European Schools. Entry into force: Immediate.</p> <p>Outcome: The Board of Governors unanimously approved the Mission and Vision of the European Schools, following agreement on a limited number of final amendments. Entry into force: Immediate.</p>	Ref: 2025-02-D-1-en-6

After the JBI and JTC changes were mainly made to Focus Area 2 Visibility of the ES and Pedagogy Area 1 Implementation of the educational approach.

After the BC the link between the SWOT-Analysis and the priorities has been added and - for the sake of completeness and continuity - also the review of the cost sharing agreement and the second round of PISA-tests. The question regarding the financing of the measure has been clarified in the introduction.

After the approval of the Mission and Vision of the European Schools in June 2025 chapter I with the Mission and Focus Area 2 in Part I have been slightly amended as it was foreseen in the decision of the Board in its meeting in April 2025.

<p>Joint Board of Inspectors Meeting on 10th and 11th February 2026</p> <p>Joint Teaching Committee Meeting on 12th and 13th February 2026</p> <p><u>Proposal:</u> The Joint Board of Inspectors and the Joint Teaching Committee are invited to take note of the updated 2025 – 2029 Multi-Annual Plan which considers the recommendations of the IAS audit on the governance arrangements in pedagogy.</p> <p><u>Outcome:</u> The Joint Board of Inspectors and the Joint Teaching Committee took note of the updated Multi-Annual Plan 2025-2029 considering the updates related to the outcome of the IAS Audit on the Governance in Pedagogy.</p>	Ref.: 2025-01-D-46-en-5
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<p>Budgetary Committee Meeting on 10 and 11 March 2026</p> <p><u>Proposal:</u> The Budgetary Committee is informed about the changes in the Multi-Annual Plan 2025-2029 related to the IAS Audit on the Governance in Pedagogy.</p>	Ref.: 2025-01-D-46-en-6
<p>Board of Governors Meeting on 15, 16 and 17 April 2026</p> <p><u>Proposal:</u> The Board of Governors is invited to approve the changes in the Multi-Annual Plan 2025-2029 considering the action plan defined to implement the IAS recommendations from the Audit on the Governance in Pedagogy.</p> <p><u>Decision:</u> The Board of Governors approved the changes to the Multi-Annual Plan 2025-2029 considering the action plan defined to implement the IAS recommendations from the Audit on the Governance in the Pedagogical area.</p>	<p>Ref.: 2025-01-D-46-en-7</p> <p>Ref.: 2025-01-D-46-en-8</p>

At the beginning of 2026 the Multi-Annual Plan 2025-2029 has been updated taking into account the outcome of the IAS Audit on the Governance Arrangements in the Pedagogical Area and the related action plan approved by the IAS.

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I. Mission of the European Schools

The European Schools' system provides high-quality, multilingual, multicultural, and inclusive education for its pupils from nursery until the end of secondary cycle. Rooted in European and democratic values, the system fosters citizenship, intercultural understanding and cooperation, equipping pupils with the competencies necessary to thrive academically, socially and personally in a diverse and a rapidly changing globalised world.

II. Introduction

This Multi-Annual Plan (MAP) is a comprehensive roadmap to drive the pedagogical and administrative priorities of the European School System over the coming five years, set up to ensure the implementation of the updated Mission and Vision of the European Schools¹ approved by the Board of Governors in its extra-ordinary meeting in June 2025. It is the way forward to provide education for tomorrow and addressing future educational needs by supporting its pupils in becoming independent learners, facilitating inclusion and diversity, positioning itself as an active participant in the dialogue with national education systems and sharing its expertise and best practice with relevant stakeholders.

The **first part** of the plan defines six system-wide focus areas, putting the focus on the future and governance of the system, the ES system's visibility, pupil and staff wellbeing, sustainability, continuous professional development and reinforcing and modernizing the ES IT infrastructure. These are transversal areas which address the ES system as such or see contributions from the different units at the OSG and Schools.

Part two outlines main priorities in the **Pedagogical Area** (Pedagogical Development, European Baccalaureate, Educational Support and Inclusive Education) and the Accredited European Schools offering a European education meeting the requirements laid down for the European Schools. The defined priorities ensure the implementation and development of the educational approach, strengthening educational support and inclusive education and making it more adoptable to the actual needs of pupils, developing and simplifying the European Baccalaureate and fostering professional development and training of all types of educators.

The **third part, Priorities in the Administration**, addresses the critical administrative elements necessary to support above-mentioned pedagogical priorities. It emphasizes human resources priorities,

¹ 2025-02-D-1-en-5

sound financial management, effective ICT infrastructure, and legislative compliance, establishing performance indicators to track and evaluate progress in each area.

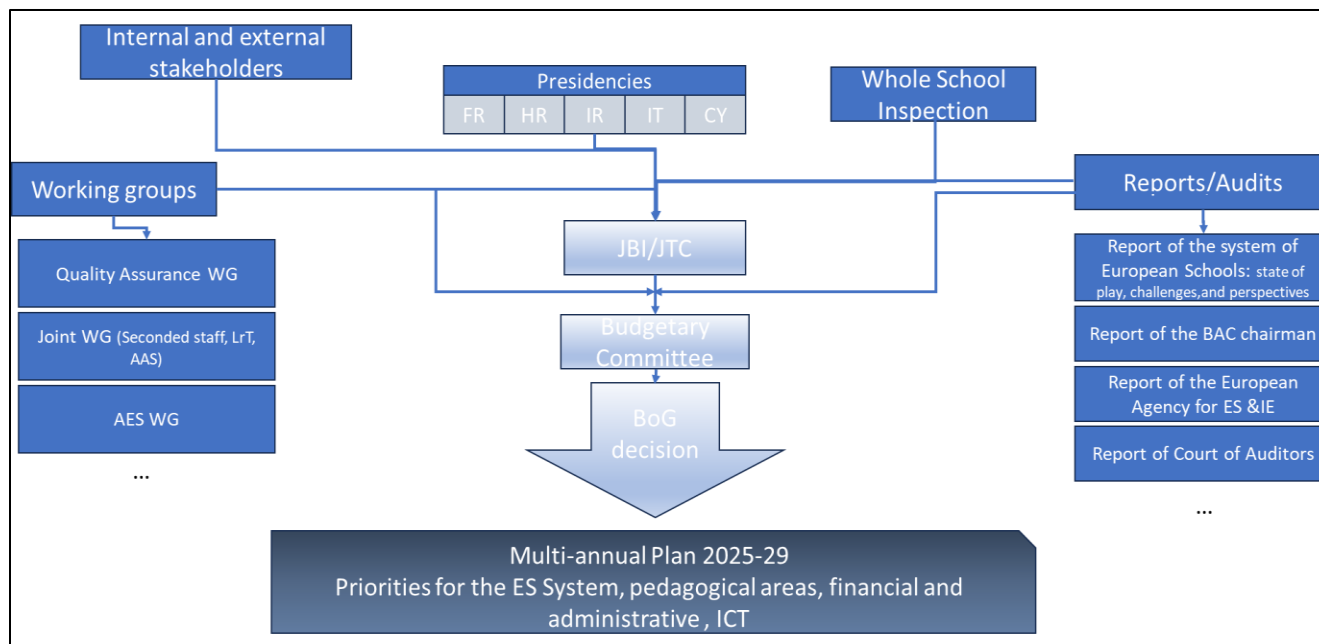
It is the Secretary-General's overall responsibility to implement this ambitious MAP but to do so, he will need to rely on the contribution of all stakeholders at all levels. The goals described here can only be achieved if all gears successfully work together. Regular follow-up and status will be ensured by the different departments within the OSG.

Each section of this plan has been carefully developed in consultation with a wide range of stakeholders to ensure a comprehensive approach that reflects the unique needs and aspirations of our school community. As we embark on this multi-year journey, we remain committed to adapting to new challenges, leveraging opportunities for improvement, and fostering a school culture rooted in excellence, equity, and resilience.

We are committed to implement the MAP with the financial resources that are made available to us, but the implementation of certain objectives may require additional means. Obviously, these are then subject to the annual budget discussion and approval procedure.

We look forward to working together with all stakeholders to turn these priorities into actions, and we are confident that this multi-annual plan will guide us in creating a brighter, more inclusive, and successful future for our students and our schools.

Which priorities were selected for the MAP?



Many sources have been taken into account in the establishment of the MAP: Most importantly and as the ES System is a governance system build on annually rotating presidencies, the priorities consider and follow-up on proposals defined, developed and approved under recent presidencies. They incorporate as well results from discussions in the different organs governing the ES (Pedagogical meetings, Budgetary Committee and Board of Governors) and ideas from different working groups, societal trends such as the digitalisation and take account of reports from various stakeholders such as the European Parliament, the Court of Auditors, the Internal Audit Service of the EU COM (IAS) and the European Agency for Educational Support and Inclusive Education.

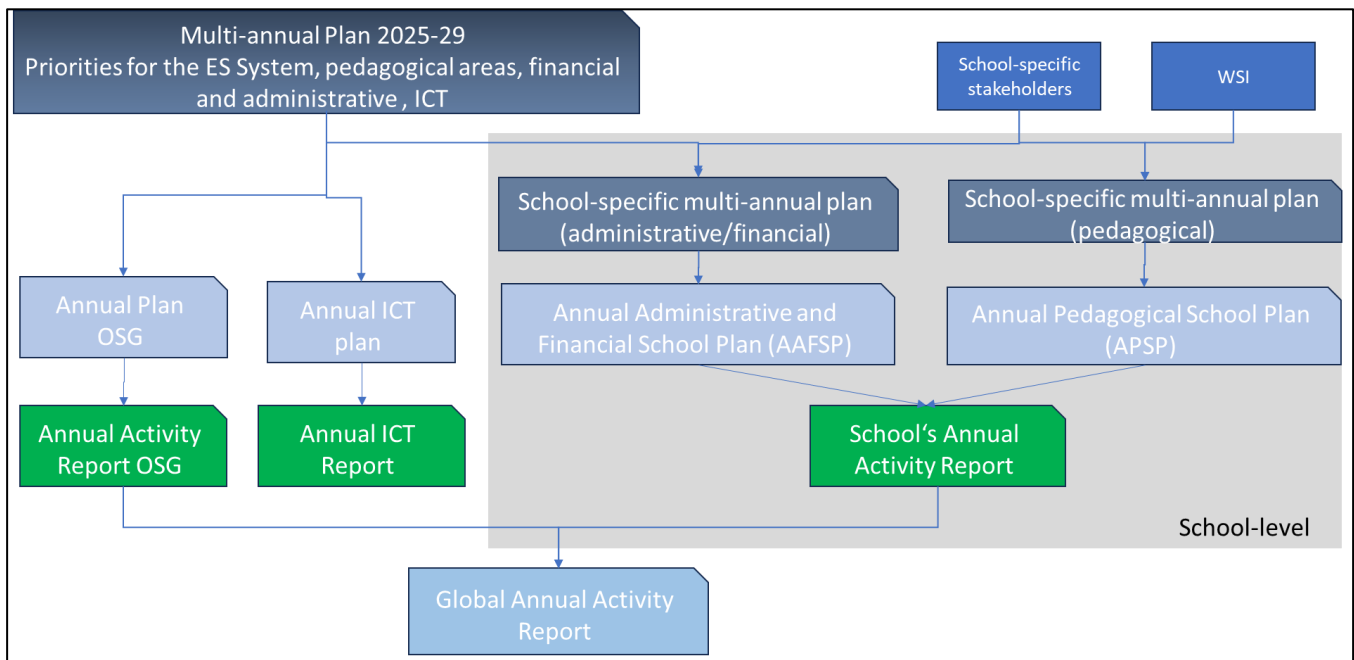
Particularly in the part Administration, the priorities don't list recurrent and ongoing tasks, but only what is done additionally to improve the ES system.

How are priorities monitored and achievements reported?

The MAP 2025-29 serves as the basis for the Annual Plans of the OSG and the Annual ICT Plans. From schools'-perspective, it acts as a starting point for the development of a School-specific multi-annual plan – divided into two parts: Pedagogy and Administration/Finance. The Multi-Annual School Plan (MASP) addresses system priorities to which the Schools contribute or which they need to implement but even more importantly school-specific goals. The MASP is further developed and detailed in two Annual School Plans: Annual Administrative and Financial School Plan (AAFSP) and Annual Pedagogical School Plan (APSP).

In the Annual Activity Reports (AAR) each entity follows up on the achievement of its annual priorities and objectives defined in the plan(s). The global AAR summarises the Schools' and OSG AARs while the ICT Unit prepares a separate comprehensive report. At the end of the 5-year period a summary assessment will be done to conclude on the implementation of the defined priorities in the MAP.

After 3 years an assessment shall be done, to reflect, if the MAP needs adjustments. If necessary, in case of major developments, the MAP shall be adjusted.





III. SWOT-Analysis

The following table – slightly revised outcome of a specific discussion of the Heads of Delegation already in April 2023 – gives an overview of the Strengths – Weaknesses – Opportunities and Threats facing the European School system.²

The SWOT-Analysis as well as the regular risk assessments done by Senior Management and shared with stakeholders are the basis for the following MAP, aligning strengths and opportunities, mitigating weaknesses and guiding the decision-making on projects, developments and investments.

Strengths	<p>In Governance</p> <ul style="list-style-type: none"> • Representation of all MS and combination of their educational systems • QA by the Inspectors of all EU MS • Stakeholder involvement • Underpinning principles of democracy, fairness and due process in decision making across the ES • Legislative power + coherent jurisdiction • Decision making – requirement of unanimity in some key areas ensures the protection of MS’ interests and steers the system towards consensus on major issues <p>In Pedagogy</p> <ul style="list-style-type: none"> • Combining teaching and learning best practices from across EU educational systems
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² 2023-04-D-30-en-1: Towards a ‘Vision for the European Schools’

	<ul style="list-style-type: none"> • Capacity and commitment to implement within the system key EU policies and frameworks in the area of education (e.g., 8 key competences, GreenComp, DigComp) • Recognition of the BAC • Strong focus on European dimension (European citizenship, European values) • Intensive and effective multilingual education within multicultural school communities • Promotion of pupils' cultural identity in a rich intercultural environment valorising difference • Competency-based curriculum, high quality of education outcomes documented by international evaluations (i.e. PISA for schools) • High focus on every pupil progress and on innovative pedagogies (i.e. CLIL approach) 	
<p>Weaknesses</p>	<ul style="list-style-type: none"> • Decision making – requirement of unanimity in some key areas can be an obstacle (not considered a weakness in all cases as it is) • Maintenance of the system is costly due to its complexity • Lack of visibility and the need for enhanced internal and external communication • Teacher recruitment and retention • Specialised administrative staff recruitment and retention • Governance of the inspectorate • Need to link internal school self-evaluation and external inspection to create a robust QA model • Lack of accountability of MS • Need for ongoing development and improvement in the BAC cycle and examination including development of internal and external QA processes • Limited jurisdiction of the Complaints Board, which does not cater for all the range of possible complaints that could be lodged by stakeholders in relation to ES decisions 	<ul style="list-style-type: none"> ⇒ Focus area (FA) 1 (Governance) ⇒ FA 1 (Governance) + Administration (simplification) ⇒ FA 2 ⇒ Part III HR (increase attractiveness) ⇒ Part III Finance (Sound financial management culture) ⇒ FA 1 (Governance in pedagogy) ⇒ Part II (Area 1, curriculum framework) ⇒ Part II European BAC ⇒ FA 1 (Governance HR)

<p>Opportunities</p>	<ul style="list-style-type: none"> • Laboratory for educational reform • Contribution to the creation/development of a European Education Area • ES BAC as a reference • Enrichment of national systems • Involvement in European teachers' training (module) – access to the expertise of Higher Education Institutions (HEIs) • Involvement of EU COM – DG EAC • Opening of the system – AES • Opening of the system – schools in third countries/neighbouring countries • Increase the Member States' participation that have not been fully engaged or active • Become a European benchmark for quality, multicultural, inclusive and comprehensive education 	
<p>Threats</p>	<ul style="list-style-type: none"> • Lack of legitimation – why do we need the ES? • Teacher shortage in EU MS • Lack of sufficient resources matching the increasing number of students in the system • Reputational risks in case of lack of QA in a growing system • Isolation due to lack of communication with other external systems • Overpopulation in the schools in Brussels 	<ul style="list-style-type: none"> ⇒ New mission and vision ⇒ Part III HR (attractiveness) ⇒ Part III HR (attractiveness) + FA 1 (cost sharing) ⇒ Part II (Pedagogy AES) ⇒ FA 2 (Foster exchanges) ⇒ Plan for the 5th School, guaranty from Belgium for site in Evere (Brussels)

IV. Overview of the priorities

1. Part 1 – ES system-wide priorities

Focus area 1: Future and governance of the ES system

In April 2024, the BoG defined and approved an Action Plan³ to follow-up systematically on recommendations from the EP *Resolution on the system of European Schools: State of play, Challenges and Perspectives*, prepared by the Committee on Culture and Education of the European Parliament⁴ ('EP Resolution'). Some of the actions have already been implemented, while others are planned for mid- and long-term implementation, thus forming a part of this multi-annual plan. This focus area ensures the implementing actions related to the future and governance of the ES system defined in the action plan.

The complex ES' governance structure has been examined on other occasions, e.g. during the IAS audit on IT governance and a second one on the governance arrangements in pedagogy. The results as well as the action plans have been shared with stakeholders and are considered in this updated version.

³ 2024-01-D-30-en-4: Action Plan: Reflection on the Future of the European Schools' System
Follow-up to the Report of the European Parliament

⁴ TA-9-2023-0306: System of the European Schools – State of play, Challenges and Perspectives

Focus area 1: Future and governance of the ES system		
	1.1	Implement the EP Action plan: reflection on the Future of the European Schools System (Cluster Administration and Governance)
		Performance of an in-depth review of the governance and management structures across the ESS and at each individual school to examine the roles, responsibilities, and structures in place at all levels, including potential conflicts of interest
		Identification of regulatory issues that are a hindrance to the ES
		Reflection about increasing the flexibility of decision-making (BoG) and a revision of the mandate of the auditors (ECA and IAS) as well as the system and mechanism of cost-sharing and financial contribution by Member States
	1.2	Revise and improve of the governance of the ES
	1.2.1	Improvement of the governance in Pedagogy
		Analysis of the decision making process in the Boards considering in particular the intentions of the 2009 Reform document and the involvement of the AES Directors
		Development of surveys to staff and pupils to systematically gather insights on various aspects of the ES system
		Adoption of a tool to accompany the inspectors' activities and to automatise work-flows for further efficiency
		Clarification and reinforcement of the OSG's pedagogical expertise to support inspectors' quality assurance actions in a growing network of Schools
		Simplification of Board meetings
		Improvement of the recruitment of experts by defining required qualifications and limiting the tenure
		Development of a welcome package for experts
	1.2.2	Revise and improve the inspectors' appointment, time commitment and accountability
		Revision of the procedure for the appointment of inspectors ensuring required qualifications and profiles
		Analysis and revision of the required commitment of inspectors and reinforcement of their accountability to the ES system
	1.2.3	Revise the governance in HR
		Revision of the Implementing Regulations for the Appointment and Evaluation of Directors and Deputy Directors
		Establishment of an evaluation procedure for members of the managerial staff of the OSG
		Revision of the management structure in the schools and provision of proposals regarding the creation of additional middle management posts
		Revision of the competences of the Complaints Board vis-a-vis national courts
		Analysis of the possibility to appoint an independent ombudsperson
		Improvement of the recruitment of seconded teachers ensuring the involvement of school management in the process
	1.2.4	Cost sharing
		Evaluate effectiveness of 2022 cost sharing agreement
		If necessary, improve or revise the 2022 cost sharing agreement
	1.2.5	Reinforce IT governance
		Closure of the IAS IT Audit recommendations
		Further improve and reinforce the IT Governance practices (IT Asset Management, Enterprise Architecture, Business Ownership, IT project benefits tracking)

Focus area 2: Visibility of the ES

While the ES system is recognized by all EU Member States as a unique inter-institutional organization offering a standardized curriculum with high academic standards and a Baccalaureate diploma accepted across Europe and beyond, we aim to further enhance our visibility and influence in the field of education within the EU. This includes exploring new forms of cooperation and partnerships with leading institutions in the education sector, strengthening regular exchanges with national education systems, as well as expanding – although only if in the interest of Member States - further the concept of the Accredited European Schools. Furthermore, the participation in educational debates with various Member States and key stakeholders in education policymaking will be strengthened. Additionally, we plan to explore the possibility of other concepts of cooperation with national schools abroad and also in countries outside of Europe to broaden our global reach.

Another area of enhancing the presence and visibility of the ES in the European Education Area can be Continuous Professional Development by developing and sharing an online training platform as well as participation in the Erasmus+ programs and the network of the Teachers' Academy through which cooperation with universities and other educational institutions could be achieved.

Focus area 2: Visibility of the ES	
	2.1 Foster exchanges and the participation in exchange programs
	2.1.1 Building Connections and Professional Growth through European projects
	Promotion of Erasmus+ actions focused on competence development of staff with relevant partners
	Exploration of new opportunities for promoting EU level cooperation and European values with relevant partners and member states
	2.1.2 Enhance collaboration with DG EAC and other relevant European organisations
	Continued participation in WGs
	Involve representatives of DG EAC and other organisations in ES Working Groups (i.e.. Sustainability, Digital Education, Child Protection)
	Explore synergies in areas of common interest related to key competences, Continuous Professional Development and in-service training, school exchanges.
	2.2 Enlarge the family of the European Schools
	2.2.1 Encourage and support the opening of new AES across Member States
	Promotion of Accredited European Schools
	Exploration of other concepts of cooperation
	Cooperation with national schools within the EU
	2.2.2 Explore the possibility to cooperate beyond EU borders
	Cooperation with national schools abroad
	Cooperation with schools and international educational organisations in neighbouring and strategic partner countries

Focus area 3: Enhancement of pupil and staff wellbeing

Pupil and staff wellbeing is critical for our Schools because it directly impacts the learning environment, academic outcomes, and overall school culture. This topic is not new, and each School has specific projects in this area. However, from a system-wide focus, this initiative is foreseen to increase the effectiveness in addressing pupil's well-being, some proposed activities stemming from the current Cypriot presidency's priorities.

Focus area 3: Enhancement of pupil and staff well-being	
	Pedagogy
	3.1 Improve the current system of pupil well-being
	Pilot 'Ambassador program' and document benefits for ES pupils
	Exploration of enhancing pupil wellbeing and personal development in the curriculum of the ES (including pastoral care)
	Review of staff ratios linked to pupil's health and well-being
	Design follow-up activities with current and future Presidencies in this area
	3.2. More effective school advisory councils and care team cooperation (Harmonization of the concepts of the school advisory councils and care team)
	Prepare a clear description of roles and functions, including harmonization of concepts
	Offer guidance on cooperation between stakeholders at school and system-level
	3.3 Promote staff well-being by increasing recognition and fostering belonging
	Analysis of the proposals and the findings of the WGs 'Teachers' career' and 'Management structures'

Focus area 4: Sustainability

As we navigate the challenges of a rapidly changing world, sustainability has become a critical priority for educational institutions. Recognizing the integral role schools play in fostering environmentally conscious and responsible citizens, this plan outlines an approach to embedding sustainability across key operational and educational domains. As outlined in the Mission of the ES sustainability is one of the core foundations of pupils' cognitive competencies. From a pedagogical point of view, it is foreseen to work on a Whole School approach to sustainability, but also other areas such as Human Resources with the promotion of a green mobility plan as well as Finance/Accounting and ICT by transitioning to green procurement practices and analyzing the necessity of Environmental, Social and Governance reporting have defined priorities in this focus area.

Focus area 4: Sustainability	
	4.1 Develop a Whole School Approach to sustainability
	4.1.1 Pilot a framework for a Whole School approach to sustainability (Cypriot priority)
	4.1.2 Strengthen OSG expertise in this area by creating a post of central coordinator for sustainability and digital education at the OSG to support green and digital transition, axes of the European Education Area
	4.1.3 Reflect and develop a sustainable vision for school trips
	4.2 Human Resources
	4.2.1 Develop and implement a green mobility package for all categories of staff
	Development of an ambitious and regularly updated ESS mobility plan (transportation)
	4.3 Finance/Accounting
	4.3.1 Analyse the necessity of a Reporting on Environmental, Social, and Governance fields/information (non-financial, ESG Reporting)
	Analyse standards and regulations and conclude on their applicability for the ES
	If concluded, implement either obligatory information or improve the reporting on a voluntary basis as good practice
	4.3.2 Move to green procurement
	4.4 ICT
	4.4.1 Develop and implement a Sustainable ICT Management in line with the "Sustainable Digitalisation" initiative of the EC
	Sustainable procurement of ICT equipment
	Sustainable discontinuation of ICT equipment
	Develop a Sustainable ICT policy

Focus area 5: Enhancement of continuous professional development

Continuous professional development (CPD) is essential to enhance the skills and performance of staff within the ES. In this MAP, CPD shall refer to all categories of staff in the ES system, not only focusing on educators. Focus area 5 highlights key actions aimed at improving training policies, infrastructure, and delivery methods to foster personal and professional development. By revising the CPD framework, developing robust infrastructure in form of a new CPD platform, enhancing and enlarging training offerings, and promoting connections through European projects and other less formal formats, this strategy shall ensure that staff are equipped with the tools and knowledge they need to thrive.

Focus area 5: Enhancement of continuous professional development within the ES (OSG, Schools, AES)		
	5.1. Enhance the training policy, infrastructure and digital training offer	
	5.1.1 Revise the CPD framework	
		Draft and adopt a revised CPD framework for ES system, supporting the professional carer development
		Identify accreditation paths and competency-based certifications, linked to European frameworks
		Create incentives for all members of staff to follow a minimum number of compulsory training days/year
		Promote the implementation of the new framework with relevant stakeholders
		Reflect on the inclusion of compulsory trainings for teachers
	5.1.2 Develop training infrastructure (CPD platform)	
		Deploy an online CPD platform, a common entry hub for training activities within ES
		Customise the platform according to ES needs
	5.1.3 Improve the existing training offer within the ES system	
		Customise selected training offers (tender)
		Enlarge and improve the training catalogue via EU Learn and agreements with other institutions and Member states
		Promote training opportunities across the ES system
	5.2 Improve delivery of training activities and career development for ES staff	
		Deliver new self-paced courses in transversal subjects
		Inspectors promote training activities using the new infrastructure
		Organise regular training events for DDFA (yearly)
	5.3 Build connections and professional growth through European projects	
	5.3.1 Build connections and professional growth through European projects	
		Promote projects focused on competence development of teachers with relevant partners (e.g. schools outside ES system)
	5.3.2 Organise Teachers' Forum and follow-up	

Focus area 6: Reinforcement and modernization of IT tools and platforms

In an era defined by digital transformation, the modernization and reinforcement of IT tools and platforms is essential for ensuring operational efficiency, enhanced educational experiences, and streamlined administrative processes. Already on its way but requiring all our attention and involving an important number of resources from the OSG and the Schools is the replacement of the ES's core IT system, the School Management System (SMS). Investments are also envisaged in other areas, such as Human Resources where the ES still do not have an integrated system but work in a very old-fashioned way, in the modernization of the ES' external website and the introduction of multi-factor authentication to improve secure access to ES' IT systems.

Focus area 6: Reinforcement and modernisation of IT tools and platforms	
	6.1 Replace the existing School Management System
	6.1.1 Data integration solution
	6.1.2 Business Intelligence modernisation (Release 1-3)
	6.1.3 School Information System (SIS)
	6.1.4 Enhanced invoicing Project (EIP)
	6.1.5 European Baccaulaureate management solution
	6.1.6 Timetabling solution
	Standardise timetabling software usage across the European School system,
	Implement a unified training programme for timetablers
	Assess the integration of WebUntis with the upcoming SIS
	6.1.7 Learning Management System (LMS)
	Launch a procurement procedure for an off-the-shelf LMS solution, chose provider until end of 2025
	Start piloting the implementation
	Prepare training materials for stakeholders at School and OSG-level
	6.2. Implement an IT tool to better support the inspectors' activities
	6.3. Modernise the IAM (Identity and Access Management) and rostering solution
	6.4. Introduce a solution for MFA (Multi Factor Authentication)
	6.5. Modernise ES external website
	6.6. Implement and roll-out an HR platform for all categories of staff
	Implementation of the HR platform at the OSG and in 3 pilot schools (EEB III, ES Bergen, ES Munich)
	Evaluate system and efficiency gains at the end of 2025
	Roll out to remaining Schools as of 2026

2. Part 2 – Pedagogy

In an evolving educational landscape, pedagogy must adapt to meet the diverse and dynamic needs of pupils and educators alike. Based on the updated ES' Mission which outlines the holistic and inclusive educational philosophy, this MAP defines the key priorities to foster innovation, inclusivity, and excellence in teaching and learning. By implementing curriculum developments, advancing further on educational support and inclusive education, promoting professional development, developing improved assessment practices, and ensuring quality assurance in Accredited European Schools, this comprehensive plan aims to create a robust foundation to create a dynamic learning environment where pupils can thrive academically, socially and personally.

Area 1: Implementation of the educational approach

To ensure educational excellence, Area 1 emphasizes the implementation of various curriculum innovations and the advancement of data-driven teaching practices. Key priorities are grounded in fostering a meaningful pupil-centered pedagogy through specific interventions concerning the enhancement of the curricular and assessment frameworks, revision of syllabi in primary and secondary cycles, conducting needs analysis among teachers, support of the implementation of new curricular changes. Additionally, this approach leverages improved data collection and analysis to improve teaching practices, support School improvements, and guide policy decisions. Together, these initiatives aim to create a dynamic, inclusive, and forward-thinking educational environment.

Area 1: Implementation of the educational approach	
1.1	Implement a new cycle of ES curriculum reform
1.1.1	Fundament a comprehensive competence-based curriculum in European schools
	Document curriculum and assessment frameworks across educational systems of Member States
	Review of existing regulations and guidelines in the ES concerning curriculum
	Develop the ES curriculum and assessment reference framework, enhancing further the 8 key competences
	Reflect on curricular changes needed to support pupil's wellbeing, including through cross-curricular approaches
1.1.2	Implement curricular innovations (new and revised syllabi)
	Revision of the primary and secondary level syllabi (part of the 10 years revision cycle)
	Steer the discussions on further needed changes in quality assurance area and curricular development
	Conduct regular needs' analysis among teachers and input to the CPD cell (with a focus on revised syllabi and follow up activities coordinated by inspectors)
	New ICT four-period course in S6 and S7 (<i>Computer Sciences</i>): develop a new syllabus, alongside dedicated training
	Implementation of the new <i>Science, Technology, and Society Syllabus</i> – S6-S7: development of specific training programs and learning resources
	Implementation of the new <i>Sustainability and Active Citizenship - Complementary course</i> – s6-s7 -S7: development of specific training programs and learning resou
1.2	Progress on data-informed teaching and learning
1.2.1	Improve existing data collection processes (BAC-report, Statistical Report, PISA, etc.)
	Monitor regularly quality of data reported by the schools
	Informing and guiding Schools on quality improvements
	Develop new tools for data collection, reporting and visualisation
1.2.2	Strengthen data analysis and usage in improving practices and policies
	Use more complex data analysis in current reports
	Share educational data with relevant OSG Units and other stakeholders
	Develop new thematic reports in relevant areas (i.e. impact of CPD training activities)
	Issue more policy focused recommendations based on data and raise the Pedagogical Unit capacity in knowledge brokerage
1.2.3	Performance of the second round of PISA test including the AES
	Performance of the tests in type I and Accredited European Schools
	Evaluation of results and definition of action plans

Area 2: Educational support and inclusive education

To ensure that the diverse learning needs of all pupils, including those with special educational needs and Intensive Support A pupils, are met, the ES will implement more flexible solutions that adapt both the curriculum and the organisation of classes, with the aim to foster a more inclusive and personalised educational experience for all pupils. Additionally, reflections about the recognizing of alternative certifications are to be examined to ensure that all learners leave the ES with a certificate enabling them to continue their development after school education. Furthermore, a transition from traditional models, which rely too often on medical diagnoses, to a needs-based assessment approach, identifying and addressing the individual abilities, strengths and support needed will be started. This ensures personalized strategies and interventions are tailored to the unique learning profile, empowering pupils to reach their full potential. Through these initiatives, we reaffirm our commitment to inclusion, equity, and excellence in education.

Area 2: Educational support and Inclusive Education (ES & IE)		
	2.1	Promote flexible approaches to address diverse pupil needs
	2.1.1	Implement flexibility in the curriculum for pupils with additional needs
		Implement curriculum modifications, including possibility to follow alternative subjects or reinforcement in core areas or following non-graded subjects
		Offer flexibility in assessments by allowing flexibility in time and alternative formats
		Allow flexibility in school year completion, enabling pupils with severe medical conditions to complete academic levels over an extended period
	2.1.2	Improve the organisation of classes including ISA pupils
		Introduce flexible pupil ratios in classes with ISA pupils
		Allow schools greater autonomy in splitting classes or adding additional support staff
		Ensure a multidisciplinary approach in determining the needs of ISA pupils
	2.1.3	Strengthen the recognition of alternative certificate in the Member States
		Establish the structure of the alternative certificate
		Establish pilot projects in the recognition in the member states
	2.1.4	Ensure continued evaluation of the provision of inclusive education in the ES
		Follow-up of the recommendations in the context of the evaluation to be carried out in 2026/2027 by the European Agency for special needs and inclusive education
		Revise the structure of the statistical report
		Implement the periodic evaluation to be carried out by the inspectors and the OSG
	2.2	Transit from a medical model of identification of pupils' abilities and needs to a needs-based assessment approach
	2.2.1	Develop and implement a comprehensive, strengths-oriented needs-based assessment framework that focuses on a pupil's functional abilities, environmental interaction, and support needs, rather than relying solely on medical diagnosis
		Mandate the Educational Support Policy WG to design the needs-based assessment framework
		Pilot the framework in three or more schools
		Develop guidelines for schools on conducting functional assessments
		Provide training for staff on using the new needs-based assessment tools
	2.2.2	Implement personalised support strategies and interventions based on the results of needs-based assessments, ensure that all pupils receive the appropriate accommodations and support for their unique learning profiles.
		Develop Individual Learning Plans (ILPs) for pupils based on the outcomes of the needs-based assessments
		Foster collaboration between teachers, support staff, and families to ensure that the identified needs are addressed
		Regularly monitor and evaluate the effectiveness of the personalised support strategies

Area 3: European Baccalaureate

The priorities in the European Baccalaureate area focus on strengthening quality assurance and simplifying the examination process while maintaining high quality, integrity and fairness. By implementing the proposed changes, these priorities aim to create a more (cost-) efficient examination system.

Key initiatives include strengthening the role of the Chief Examiner to uphold rigorous quality assurance, reducing potentially the number of exams and further externalizing the exam correction process, as well as establishing a robust code of ethics for examiners. Additionally, the continued implementation of online assessments, including digital tools for written and oral exams, reflects a commitment to leveraging technology to improve the examination process.

Area 3: European Baccalaureate		
	3.1	Simplify the European Baccalaureate
	3.1.1	Implement and develop the role of Chief examiner
		After approval and appointment ensure enhanced quality assurance by adding an additional layer of supervision
	3.1.2	Simplify the BAC exams
		Discuss and decide about proposals to simplify the ES BAC with respect to the number of exams and a potential externalisation of written corrections
	3.1.3	Develop a code of ethics for the European Baccalaureate examiners
	3.1.4	Simplify the arrangements for the preparation of BAC exams
	3.2	Proceed with the implementation of online assessments
		Develop a tool for online oral examination
		Digitalisation of the written examinations

Area 4: Accredited European Schools

The steady increase in the number of Accredited European Schools (AES) coupled with their distinctive and unique governance model, has led to the need for an enhanced the quality assurance process, which was approved by the BoG in December 2024. To bring these changes to life in the coming years, elements, such as an earlier initial audit for the Bac cycle, a follow-up cycle, more involvement of the national inspectors as well as more-in-depth lesson observations are foreseen in the revised audit framework. The implementation of the framework will ensure keeping the high quality of education provided by the AES.

Area 4: Accredited European Schools		
	4.1	Assure the quality of teaching and learning in the AES
	4.1.1	Implement and assess the revised audit framework

3. Part 3 – Administration

The Administration is the backbone of an organization, ensuring ideally the smooth management of the day-to-day operations and long-term strategic objectives.

The following part of the plan defines the key priorities and performance indicators of the areas Human Resources (HR), Finance, Accounting and Internal Control, ICT and Legislative Compliance. Each section highlights specific goals, initiatives and measurable outcomes designed to enhance the efficiency, attractiveness and sustainability of the ES system.

HR: Focuses on increasing the ES system's attractiveness for the three different staff categories, observing and reviewing the cost-sharing mechanism (if necessary), and implementing a tracking system of performance metrics related to staff retention, training, and recruitment.

Finance, Accounting and Internal Control: Emphasizes sound financial management, the simplification initiatives initiated under the French presidency, progression to an upgraded internal control framework (COSO), and progress monitoring through key performance indicators focusing on opinions of external stakeholders.

ICT: Details priorities for strengthening IT infrastructure, security, governance, and digital transformation, alongside plans for staff training and improved communication. Performance indicators assess service quality, project efficiency, and innovation.

Legislative Compliance: Addresses the need for improving the implementation of critical regulatory frameworks, such as GDPR and the AI Act, to ensure accountability and compliance.

A. Human Resources

In the area of HR, topics that have been previously discussed will be reintroduced to the agendas of the decision-making bodies. These topics are central to our core values, aimed at creating an attractive and successful ES system. The goal is to finally reach solutions that are acceptable and supported by all stakeholders considering the strict budget policy of many Member States and the EU Commission but still ensuring the ES system remains attractive to highly qualified staff members in all categories.

With the implementation of a HR software (see focus area 6) planned for 2025 and 2026, it is anticipated that HR services will be tracked and managed a lot more efficiently than in the past.

HR	A Human Resources	
	A.1.	Increase the attractiveness of the ES system for staff
	A.1.1	For Seconded Teaching Staff
		Review of the discrepancy of salaries between the nursery/primary and the secondary cycle
		Review the salaries of Educational Advisors
	A.1.2	For Locally Recruited Staff
		Prepare a proposal to recognize relevant job experience
		Review the salary discrepancy between Nursery/Primary and Secondary cycles
		Improve further the job security for LrT, enlarge the concept of protected functions
	A.1.3	For AAS
		Revision of AAS salaries in line with Art.25 of the Regulations for Administrative and Ancillary Staff
		Clarification of the legal status and job security of supervisors (Belgium)
	A.2.	Revise the cost sharing agreement
		Analyse the effectiveness of the current cost sharing agreement
	A.3	Key Performance Indicators
	A.3.1.	% of seconded staff in the ES system
A.3.2.	% of LrT leaving due to a lack of attractiveness	
A.3.3.	% of successful AAS candidates refusing the job offer	
A.3.4.	% of AAS leaving the ES system due to a lack of attractiveness	
A.3.5.	% of AAS participating in a training	

B. Finance - Accounting - Internal Control

The areas of Finance - Accounting - Internal Control have received significant attention over the past decade due to important fraud cases occurring over 10 years ago and important findings and remarks from auditors. Following structural reforms and significant improvements in all areas, the ES now aim to put the focus on continuing to ensure sound financial management, transparency and accountability. This section outlines key priorities and actions focused on simplifying processes, strengthening internal control mechanisms, and fostering further a culture of sound financial management across the organization. The success of the actions shall be measured by key performance indicators looking very simply at the % of budget implementation but also at the outcome of external assessments by the European Court of Auditors and Internal Audit Service.

Sound financial management and internal control	B. Finance - Accounting - Internal control	
	B.1	Specific priorities
	B.1.1	Implement the Simplification Action Plan
		Centralisation of procurement procedures of general interest in the ES system
		Implementation of an enhanced invoicing module in SAP (see also point 6.1.4)
		Centralisation of the calculation and posting of the seconded staff salaries
		Redeployment of resources from local to central level, reduction of overall staff force
	B.1.2	Implement an updated Internal Control Framework (COSO Internal Control Framework)
		Define and approve a new framework for Internal Control following COSO
		Develop a sample implementation of the adopted framework
		Roll out to all Schools and OSG (gradually)
		Training of staff members in the Schools/OSG
	B.1.3	Reinforce the sound financial management culture in the ES system
		Improve the exchange about best practices used in the Schools
		Foster exchanges between the OSG and Schools more often and once a year in situ in various areas (LAOCs, Procurement network,...)
		Induction of new key staff in the financial area (Directors, DDFAs, HA/LAOC)
		Offer more trainings on different areas with possibility to practice/exchange
		Create and update policies and procedures where necessary and improve their accessibility
	B.2	Key Performance Indicators
	B.2.1	Budgetary surplus limited to max 1% of the total ES budget (how to take qualitative information into account?)
B.2.2	Discharge to the Management of the ES	
B.2.3	ECA recommendations assessed as not implemented or only in some respects	
B.2.4	Number of overdue recommendations of the IAS	

C. ICT

In previous years, the ICT Unit had its own Multi-Annual plan. To ensure alignment across various plans, the previous Multi-annual ICT plan – which has not yet been fully implemented – will be continued and has been carried forward to this MAP.

The ICT Unit continues to face significant challenges due to accumulated technical debt, including outdated infrastructure solutions, a high number of legacy systems and urgent IT-security reinforcement needs. Additionally, there is a strong demand from stakeholders to keep pace with advancements in Educational Technologies, as well as emerging technologies like AI. Therefore, the focus will be on continuing key projects already underway, while also exploring new areas for progression. The key performance indicators will be put in place progressively heading towards modern IT management.

ICT	C. ICT (partially continued from previous Multi-annual IT plan)	
	C. 1 Specific Priorities	
	C.1.1	Reinforce and modernise IT tools and platforms (=> see focus area 6)
	C.1.2 Reinforce the IT Security	
		Extend and improve the regular IT security audits
		Implement CERT-solution (Computer-emergency-response-team)
		Reinforce information security - introduce DLP, document classification
		Implement Zero-trust security model
		Reassure compliance with legal regulations and directives
		Introduce Multi-factor authentication
		C.1.3 Improve and reinforce the IT Governance (=> see focus area 1)
	C.1.4 Improve and reinforce IT Operations - IT support and Business Continuity	
		Introduce and improve existing monitoring solutions
		Improve IT Service Management based on ITIL best practices- IT Support, Change Management,
		Reinforce and strengthen IT infrastructure
		Improve incident and problem management processes
		Improve Disaster Recovery plans
		Standardize ICT services
	C.1.5 Advance on digitalisation and other developments	
		Strengthen Data Governance
		Enhance Business Intelligence (BI)
		Strengthen Enterprise Architecture (EA) and IT Ecosystem Transparency
		Increase System Interoperability and Integration
		Foster Agile Project Management
	C.1.6 ICT Training and Communication	
		Develop a IT training policy for IT staff
		Improve IT knowledge management
		Facilitate training of ICT staff
		Implement the IT communication strategy
	C. 4 Key Performance Indicators	
		C.4.1 SLA execution level
		C.4.2 Incident resolution time
	C.4.3 Customer satisfaction degree for ICT services	
	C.4.4 Advanced Data Utilisation - extent to which ES uses BI's capabilities for deeper insights and actionable intelligence	
	C.4.5 IT security scores	
	C.4.6 IT spend change and budget utilisation in %	
	C.4.7. IT project efficiency - % of projects on-time, on-budget, on-spec etc.	
	C.4.8. IT Business Ownership Adoption index	
	C.8.9. Functional Delegation Maturity index - SKU engagement and adoption	
	C.4.10. IT Innovation in % of the total ICT spend	

D. Legislative Compliance

The focus on legislative compliance includes strengthening accountability in relation to the General Data Protection Regulation (GDPR) and preparing for the implementation of the AI Act. This section outlines the specific priorities that will guide the ES system in aligning with these important regulations. These initiatives are designed to safeguard personal data and ensure the ethical use of AI technologies, reinforcing the ES system's commitment to legal and regulatory compliance.

Compliance	D. Legislative compliance	
	D.1 Specific priorities	
	D.1.1	Increase GDPR accountability
		Review the GDPR plan of 2018
		Work on the implementation of the 7 accountability principles used by Data Controllers worldwide
	D.1.2	Follow up on the outcome of the external consultancy to clarify controllership
		Preparation and adoption of templates, policies and privacy statements
	D.1.3	Implement the AI Act
		Define a clear vision for AI for the ES
		Prepare a clear policy to understand obligations and governance to ensure implementation
		Train responsible staff
		Review and supervise the implementation
	D.1.4	Clarify the applicability of primary and secondary EU legislation to the ES system
		Clarify, for each of the schools, which these areas would be concerned and how the schools could get the necessary advice/support to implement national/local legislation
		Define how the schools could get the necessary advice/support to implement national/local legislation

V. Complete overview of priorities

PART 1 - ES System	
Future ES System	Focus area 1: Future and governance of the ES system
	1.1 Implement the EP Action plan: reflection on the Future of the European Schools System (Cluster Administration and Governance)
	1.2 Revise and improve of the governance of the ES
	1.2.1 Improvement of the governance in Pedagogy
	1.2.2 Revise and improve the inspectors' appointment, time commitment and accountability
	1.2.3 Revise the governance in HR
	1.2.4 Cost sharing
	1.2.5 Reinforce IT governance
	Focus area 2: Visibility of the ES
	2.1 Foster exchanges and the participation in exchange programs
	2.1.1 Building Connections and Professional Growth through European projects
	2.1.2 Enhance collaboration with DG EAC and other relevant European organisations
	2.2 Enlarge the family of the European Schools
	2.2.1 Encourage and support the opening of new AES across Member States
	2.2.2 Explore the possibility to cooperate beyond EU borders
	Focus area 3: Enhancement of pupil and staff well-being
	Pedagogy
	3.1 Improve the current system of pupil well-being
	3.2. More effective school advisory councils and care team cooperation (Harmonization of the concepts of the school advisory councils and care team)
	3.3 Promote staff well-being by increasing recognition and fostering belonging
	Focus area 4: Sustainability
	4.1 Develop a Whole School Approach to sustainability
	4.2 Human Resources
	4.2.1 Develop and implement a green mobility package for all categories of staff
	Development of an ambitious and regularly updated ESS mobility plan (transportation)
	4.3 Finance/Accounting
	4.3.1 Analyse the necessity of a Reporting on Environmental, Social, and Governance fields/information (non-financial, ESG Reporting)
	4.3.2 Move to green procurement
	4.4 ICT
	4.4.1 Develop and implement a Sustainable ICT Management in line with the "Sustainable Digitalisation" initiative of the EC
	Focus area 5: Enhancement of continuous professional development within the ES (OSG, Schools, AES)
	5.1. Enhance the training policy, infrastructure and digital training offer
	5.1.1 Revise the CPD framework
	5.1.2 Develop training infrastructure (CPD platform)
	5.1.3 Improve the existing training offer within the ES system
	5.2 Improve delivery of training activities and career development for ES staff
	5.3 Build connections and professional growth through European projects
	5.3.1 Build connections and professional growth through European projects
	5.3.2 Organise Teachers' Forum and follow-up
	Focus area 6: Reinforcement and modernisation of IT tools and platforms
	6.1 Replace the existing School Management System
	6.1.1 Data integration solution
	6.1.2 Business Intelligence modernisation (Release 1-3)
	6.1.3 School Information System (SIS)
	6.1.4 Enhanced invoicing Project (EIP)
	6.1.5 European Baccalaureate management solution
	6.1.6 Timetabling solution
	6.1.7 Learning Management System (LMS)
	6.2. Implement an IT tool to better support the inspectors' activities
	6.3. Modernise the IAM (Identity and Access Management) and rostering solution
	6.4. Introduce a solution for MFA (Multi Factor Authentication)
	6.5. Modernise ES external website
	6.6. Implement and roll-out an HR platform for all categories of staff

PART 2 - Pedagogy	
PEDA	Area 1: Implementation of the educational approach
	1.1 Implement a new cycle of ES curriculum reform
	1.1.1 Fundament a comprehensive competence-based curriculum in European schools
	1.1.2 Implement curricular innovations (new and revised syllabi)
	1.2 Progress on data-informed teaching and learning
	1.2.1 Improve existing data collection processes (BAC-report, Statistical Report, PISA, etc.)
	1.2.2 Strengthen data analysis and usage in improving practices and policies
	Area 2: Educational support and Inclusive Education (ES & IE)
	2.1 Promote flexible approaches to address diverse pupil needs
	2.1.1 Implement flexibility in the curriculum for pupils with additional needs
	2.1.2 Improve the organisation of classes including ISA pupils
	2.1.3 Strengthen the recognition of alternative certificate in the Member States
	2.1.4 Ensure continued evaluation of the provision of inclusive education in the ES
	2.2 Transit from a medical model of identification of pupils' abilities and needs to a needs-based assessment approach
	2.2.1 Develop and implement a comprehensive, strengths-oriented needs-based assessment framework that focuses on a pupil's functional abilities, environmental interaction, and support needs, rather than relying solely on medical diagnosis
	2.2.2 Implement personalised support strategies and interventions based on the results of needs-based assessments, ensure that all pupils receive the appropriate accommodations and support for their unique learning profiles.
	Area 3: European Baccalaureate
	3.1 Simplify the European Baccalaureate
	3.1.1 Implement and develop the role of Chief examiner
	3.1.2 Simplify the BAC exams
	3.1.3 Develop a code of ethics for the European Baccalaureate examiners
	3.1.4 Simplify the arrangements for the preparation of BAC exams
	3.2 Proceed with the implementation of online assessments
	Area 4: Accredited European Schools
4.1 Assure the quality of teaching and learning in the AES	
4.1.1 Implement and assess the revised audit framework	

PART 3 - Administration	
HR	A Human Resources
	A.1. Increase the attractiveness of the ES system for staff
	A.1.1 For Seconded Teaching Staff
	A.1.2 For Locally Recruited Staff
	A.1.3 For AAS
	A.2. Revise the cost sharing agreement
	A.3 Key Performance Indicators
	A.3.1: % of seconded staff in the ES system
	A.3.2: % of Lrt leaving due to a lack of attractiveness
	A.3.3: % of successful AAS candidates refusing the job offer
	A.3.4: % of AAS leaving the ES system due to a lack of attractiveness
A.3.5: % of AAS participating in a training	
Sound financial management and internal control	B. Finance - Accounting - Internal control
	B.1 Specific priorities
	B.1.1 Implement the Simplification Action Plan
	B.1.2 Implement an updated Internal Control Framework (COSO Internal Control Framework)
	B.1.3 Reinforce the sound financial management culture in the ES system
	B.2 Key Performance Indicators
	B.2.1 Budgetary surplus limited to max 1% of the total ES budget (how to take qualitative information into account?)
	B.2.2 Discharge to the Management of the ES
B.2.3 ECA recommendations assessed as not implemented or only in some respects	
B.2.4 Number of overdue recommendations of the IAS	

ICT	C. ICT (partially continued from previous Multi-annual IT plan)	
	C. 1 Specific Priorities	
		C.1.1 Reinforce and modernise IT tools and platforms (=> see focus area 6)
		C.1.2 Reinforce the IT Security
		C.1.3 Improve and reinforce the IT Governance (=> see focus area 1)
		C.1.4 Improve and reinforce IT Operations - IT support and Business Continuity
		C.1.5 Advance on digitalisation and other developments
		C.1.6 ICT Training and Communication
	C. 4 Key Performance Indicators	
		C.4.1 SLA execution level
		C.4.2 Incident resolution time
		C.4.3 Customer satisfaction degree for ICT services
		C.4.4 Advanced Data Utilisation - extent to which ES uses BI's capabilities for deeper insights and actionable intelligence
		C.4.5 IT security scores
		C.4.6 IT spend change and budget utilisation in %
		C.4.7. IT project efficiency - % of projects on-time, on-budget, on-spec etc.
		C.4.8. IT Business Ownership Adoption index
	C.8.9. Functional Delegation Maturity index - SKU engagement and adoption	
	C.4.10. IT Innovation in % of the total ICT spend	
Compliance	D. Legislative compliance	
	D.1 Specific priorities	
		D.1.1 Increase GDPR accountability
		D.1.2 Follow up on the outcome of the external consultancy to clarify controllership
		D.1.3 Implement the AI Act
	D.1.4 Clarify the applicability of primary and secondary EU legislation to the ES system	