



Administrative aspects of ensuring the right to full general secondary education: The experience of EU countries

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■ **Abstract.** The article explored the powers and activities of public authorities in EU member states (based on the examples of Spain, Lithuania, and France) in ensuring citizens' right to complete general secondary education. One of the European Union's key priorities is the creation of a common educational space. EU countries have identified the provision of accessible and high-quality secondary education as a priority and have developed mechanisms to integrate this right into their legislative and administrative practices. These efforts involved a comprehensive approach that includes effective coordination between central and local authorities, investment in educational infrastructure, support for inclusion, and the implementation of innovative teaching methods. A distinctive feature of European education is the involvement of students and parents in the governance of educational institutions, which helps to create an educational environment that meets the needs of education service users. The study identified two approaches to the organisation of secondary education in the EU: linear and staged. It also highlighted differences in the operation of educational governance models that reflect each country's unique historical, socio-economic, and political contexts. The article outlined the management features of decentralised education systems in Spain and Lithuania, where local self-government bodies also act as stakeholders in guaranteeing the right to complete general secondary education. In contrast, the French case illustrated a centralised system of educational governance, where the state regulates all aspects of educational activity – from determining curriculum content to setting overarching principles and standards for educational quality. Based on the analysis, the article formulated recommendations for optimising Ukraine's domestic system for ensuring the right to complete general secondary education in line with the best management practices of Spain, Lithuania, and France

■ **Keywords:** public administration; international experience; access to education; quality of education, educational governance

■ Introduction

A high-quality secondary education is only possible with an effective system of public administration that ensures proper conditions for the functioning of the educational system, transparent financing, high quality standards, accessibility,

and equal opportunities for all citizens to obtain education. The experience of European countries in guaranteeing the right to complete general secondary education is of great importance for Ukraine in the context of its aspirations for

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European integration. The educational governance system in Ukraine remains inert, in some aspects still marked by remnants of the Soviet administrative model. In contrast, EU countries have long since identified the provision of accessible and high-quality secondary education as one of their priorities. They have developed mechanisms to integrate this right into their legislative and administrative practices through a comprehensive approach that includes effective cooperation between central and local authorities, investment in educational infrastructure, support for inclusion, and the implementation of innovative teaching methods. Therefore, amid the reform of the educational sector, rising demands for the quality of educational services, and the processes of European integration, it is crucial to examine the experience of EU member states in ensuring the right to complete general secondary education. This will allow for the development of recommendations to optimise Ukraine's education system in accordance with the best European practices.

Education is increasingly viewed not only as a tool for social development but also as a means of shaping the state's image and implementing its foreign policy. As noted by V. Pashkov (2020), European countries actively use the education sector as an element of "soft power", integrating humanitarian policy into the system of international influence. This affirms the relevance of revisiting Ukrainian educational policy in the strategic context of European integration.

The issue of ensuring citizens' right to complete general secondary education, in relation to the competences of public authorities, has attracted the attention of scholars, especially in light of Ukraine's European integration trajectory. European trends in the development of school education – both in terms of EU-wide policies and the shared or divergent characteristics of individual member states – have been examined in the monograph by O. Lokshyna *et al.* (2021). The researcher analysed not only European but also international experiences, including that of Germany and Poland, with regard to school education. She argued that the goal of education in modern conditions is not merely the transmission of knowledge, but the development of essential/key competences and qualifications. In her words, "a highly qualified specialist who meets the demands of an innovative economy and, at the same time, an active citizen capable of successfully living in a multicultural community – is the kind of product the globalised world expects from education".

The Polish case was taken as a foundation in the work of A. Rachynskyi (2022), who outlined the European standards for organising the educational process as prerequisites for integration into the EU's educational space. The scholar emphasises that the prevailing educational approach in the EU is grounded in several key principles: democracy (focus on individuality and creative thinking), relevance (education's high practical and social value), lifelong learning (absence of temporal gaps in knowledge acquisition), flexibility (adaptation to modern realities), technological

progress (use of digital technologies), and internationalisation (alignment with EU-wide standards and mutual recognition of school certificates, diplomas, etc.).

In her research, O. Shparyk (2022) examined strategic EU documents on the digital transformation of the educational environment and the feasibility of implementing these approaches in Ukraine's general secondary education system. The researcher highlighted current trends in the integration and harmonisation of school systems within the EU, including: harmonisation of school structures and curricula; ensuring the quality of school education; implementation of innovative teaching and assessment methods; digital transformation of school education; standardisation of teacher requirements and professional development; promotion of academic mobility for students and teachers; ensuring social inclusion and equal access to education; and strengthening the managerial and organisational autonomy of schools.

Noteworthy as well is the study by V.O. Radkevych *et al.* (2020), which presents a comparative analysis of European practices in vocational education as a component of secondary education, and the possibilities of their implementation in Ukraine as part of ongoing educational reforms. The authors examined organisational models of vocational education systems and contemporary types of vocational institutions in EU countries, their educational programs, and quality assurance approaches. The proposed innovations for improving Ukraine's vocational (vocational-technical) education system are particularly applicable in the post-war period.

Lithuanian authors M. Miguéns & M. Douterlungne (2021) analysed the operation of Lithuania's Education Council as a public advisory body to the parliament, substantiating its important role in shaping and implementing national education policy. The experience of Lithuania's administrative system, particularly in granting broad authority to local governments – including the organisation of open competitions for leadership positions in educational institutions – was elaborated by R. Nesterenko (2022). The researcher emphasised the need for communities to develop optimal networks of educational institutions, as this would improve service quality and optimise related budget expenditures – an especially relevant issue for Ukraine. Regarding the reorganisation of the educational network, the author noted that financial capacity, current demographic conditions, physical accessibility of institutions, and the possibility of transporting students and teachers must all be considered.

Education is a significant domain of individual, national, and global life, as it contributes both to the comprehensive development of individuals and to socioeconomic advancement. At the same time, as noted by I.S. Pyroha (2023), the diversity of approaches to organising educational systems at the international level results in considerable disparities in access to education across countries. This underscores the need to develop international legal cooperation in this area.

In her monograph, O.V. Postupna (2021) substantiated the appropriateness of introducing the concept of “public administration of regional educational systems” into the scientific discourse of public administration theory, drawing particularly on leading European practices in education governance. She noted that Ukraine already has some relevant experience and groundwork in this direction. However, the researcher contends that many issues remain unresolved and can only be addressed through a process of trial and error: “Each community must follow its own evolutionary path of development”.

The relevance of adopting the experience of European countries in diversifying the sources of funding for general secondary education institutions is emphasised in the work of A. Ramsky (2023). The author considered the implementation of fundraising projects especially noteworthy, which is highly relevant during wartime and in the context of post-war economic recovery in Ukraine. T.M. Slinko & E.V. Tkachenko (2023), having studied the state and specific legal features of the Europeanisation of Ukrainian education, concluded that Ukraine should adopt the constitutional approaches of European countries regarding education governance. After analysing the international experience of utilising education funding as a driver of economic growth in the post-war period, N. Nazukova (2023) concluded that ensuring access to quality education – as an integral component of human capital and a factor in labour productivity growth – should become one of the key priorities of national policy during Ukraine’s post-war recovery.

Thus, the analysis of the scholarly literature on the subject allows to conclude that the coverage of the managerial aspects of ensuring the right to complete general secondary education in EU countries has not yet acquired

a systematic nature. Among the existing problematic issues in the studied topic are the presence of two financing pathways – based on public and private ownership – different levels of decentralisation in governance, and a focus on specific components of securing the said right. Furthermore, the disclosure of the experiences of individual EU countries requires further generalisation and adaptation to the particular extraordinary circumstances of Ukraine.

The purpose of this article was to examine, by means of the activities of public authorities in Spain, Lithuania, and France, the peculiarities of ensuring citizens’ right to complete general secondary education in EU member states. In accordance with this purpose, the following objectives have been set: to analyse the experience of EU countries in securing the right to complete general secondary education; to elucidate the normative-legal framework; and to identify the organisational mechanisms for ensuring citizens’ right to complete general secondary education in the EU member states (Spain, Lithuania, and France). Additionally, the article aims to formulate recommendations for optimising the national system of ensuring citizens’ right to complete general secondary education.

Materials and Methods

The study employs a comprehensive analysis of legal and administrative documents regulating the provision of the right to complete general secondary education in selected EU countries – Spain, Lithuania, and France. The research’s source base comprises pan-European legal acts governing the educational policies of EU countries regarding the assurance of citizens’ right to complete general secondary education. Additionally, the national constitutions and education laws of the chosen states were analysed (Table 1).

Table 1. Pan-European legal acts regulating the educational policy of EU countries concerning the provision of citizens’ right to complete general secondary education

Country/Union	Name Document
EU	Charter of Fundamental Rights of the European Union (2012); European Social Charter (revised) (1996); Convention for the Protection of Human Rights and Fundamental Freedoms (with Protocols) (1950); Recommendation No. R(85)7 of the Committee of Ministers to Member States on the Teaching and Learning of Human Rights in Schools (1985); Council Framework Programme EU Education and training 2020 (2021); Council Resolution on a Strategic Framework for European Cooperation in Education and Training Towards the European Education Area and Beyond (2021-2030) (2021); European Convention on the Rights of the Child (1996).
Spain	Constitution of Spain (1978); Organic Law No. 3/2020 on Education (2020).
Lithuania	Constitution of the Republic of Lithuania (1992); Education Law of the Republic of Lithuania (1991) (with changes 2011, 2017, 2024).
France	Constitution of France (Constitution of 4 October 1958, 1958); Education Code (2013); Law of France No. 2019-791 “On a School of Trust” (2019).

Source: compiled by the authors

The application of content analysis to the aforementioned international documents made it possible to identify key common characteristics of the European educational

space that ensure citizens’ right to complete general secondary education. To reveal the differences and similarities in national policies (Spain, Lithuania, and France)

and education governance mechanisms in these countries, a comparative legal analysis was used. This approach allowed for uncovering the specifics of each country in guaranteeing citizens' right to complete general secondary education and the activities of public authorities in organising the educational process and ensuring quality education.

For assessing administrative approaches to implementing the right to education, the case study method was applied, focusing on Spain, Lithuania, and France as examples of decentralised, mixed, and centralised models of education governance, respectively. The comparison was conducted across parameters such as the level of decentralisation in managing the educational process, sources of funding, autonomy of educational institutions in adhering to language policies and the principle of inclusiveness. Particular attention was paid to issues of guaranteeing accessibility, inclusiveness, and quality of education.

In addition to legislative documents, political program documents of the European Commission were also analysed, notably the strategic frameworks "Education and Training 2020" and "Education and Training 2021-2030". This analysis allowed outlining goals, implementation tools, and indicators for evaluating the effectiveness of educational reforms in EU countries. To form scientifically grounded conclusions, scientific publications, monographs, and analytical reports of Ukrainian and European researchers on education governance in EU countries were included in the analysis. This also enabled integrating the findings into a broader academic context.

Using methods of analytical abstraction and generalisation, trends and practices were formulated that can be adapted to Ukrainian educational policy, considering the course of European integration, the challenges of war, and the needs of post-war recovery. Modelling, forecasting, and extrapolation methods made it possible to outline a series of recommendations for applying the experience and positive achievements of EU countries in ensuring citizens' right to complete general secondary education in Ukraine.

■ Results and Discussion

Legislative foundations for the implementation of the right to secondary education in EU countries

The realisation of the right to complete general secondary education in the countries of the European Union is based on a range of international and national legal acts. The overarching legal framework is provided by the Charter of Fundamental Rights of the European Union (2012),

which in Article 14 proclaims the right of everyone to education, including the right to free compulsory education. This provision is mandatory for implementation in the national legislation of each EU member state, thereby establishing common standards while allowing countries to maintain their own models of implementation.

The shared goals and priorities of European cooperation in education and training are outlined in the Council Resolution on the strategic framework for European cooperation in education and training towards the European Education Area and beyond (2021-2030) (Council Resolution..., 2021). The main directions of this strategy include ensuring high-quality education, fairness, inclusiveness, and accessibility for all; creating conditions for lifelong learning and promoting mobility; enhancing the professional skills and motivation of educators; developing European higher education; as well as supporting the ecological and digital transformation of education systems. Additionally, the document emphasises support for refugees in accessing complete secondary education within EU countries.

According to Article 17 of the aforementioned Charter, equal access to education must be guaranteed for all children within EU countries. Particular attention is given to vulnerable groups, including children from ethnic minorities, asylum seekers, refugees, children in hospitals, those in care, pregnant teenagers, and children deprived of liberty. Ensuring their educational rights prioritises their integration into mainstream schools and inclusion in standard educational programs, which promotes social inclusion and reduces inequality (Charter of Fundamental Rights..., 2012). Furthermore, the EU upholds equal rights to full secondary education for persons with disabilities, as emphasised in the Charter. The 2030 plan states that "member states shall take measures to enable integration and ensure that both mainstream and special schools provide appropriate education. Furthermore, member states should demonstrate significant progress in creating inclusive and adaptive education systems" (Council Resolution..., 2021). The European Committee of Social Rights monitors compliance with this right. For example, in 2017, the Committee found a violation of the right to inclusive education for children with intellectual disabilities in the Flemish Community of Belgium due to the lack of an effective remedy against denial of admission of children with intellectual disabilities to mainstream schools (Ensure inclusive..., 2024). A concise analysis of the main legislative norms of the EU in the field of education is presented in Table 2.

Table 2. Pan-European legislative norms regulating the guarantee of the right to complete general secondary education

Document title	Key standards of the European education area in ensuring citizens' right to complete general secondary education
Charter of Fundamental Rights of the European Union (2012), art. 14, 21	Compulsory and free education is recognised as a fundamental right. Access to complete general secondary education, as part of "compulsory education", which must be free of charge, is confirmed. The right to continue education after basic schooling (i.e., upper secondary, specialised, or academic secondary education) is ensured. Any discrimination is prohibited, including on the grounds of gender, racial or ethnic origin, religion or beliefs, disability, age, or sexual orientation.

Table 2. Continued

Document title	Key standards of the European education area in ensuring citizens' right to complete general secondary education
European Social Charter (revised) (1996), art. 10, 17	Access to general and vocational education is guaranteed. Article 17 obliges the member states to take measures to ensure the effective exercise of children's and adolescents' rights to development, including the right to education.
Convention for the Protection of Human Rights and Fundamental Freedoms (with Protocols) (1950), art 2.	No one can be denied the right to education. The state must ensure this right without discrimination. Parents have the right to raise and educate their children according to their beliefs.
Recommendation No. R(85)7 of the Committee of Ministers to Member States on the Teaching and Learning of Human Rights in Schools (1985)	Provision of free education; special attention to vulnerable groups of children. Emphasises the state's obligation to ensure compulsory basic education for all children regardless of their social background.
Framework Programme of the Council of the EU Education and training 2020 (2021)	Guides EU countries to reduce early school leaving rates to below 10%. Serves as a roadmap for the development of the European education system, taking into account the principles of equality, social integration, and sustainable development.
Council Resolution on a Strategic Framework for European Cooperation in Education and Training Towards the European Education Area and Beyond (2021-2030) (2021)	Special attention is given to reducing the share of students demonstrating low proficiency in core subjects. The target is to have no more than 15% of such students across the entire EU. The goal set in ET 2020 is maintained: to reduce the rate of early school leaving (before completing full secondary education) to no more than 9%. Emphasis is placed on preventive work with students, psychological support, and parental involvement.
European Convention on the Rights of the Child (1996)	The Convention recognises the child not only as an object of care but also as a rights-holder, capable of exercising their own educational rights and participating in decisions affecting their life.

Source: compiled by the authors

In the national legal systems of Spain, Lithuania, and France, the right to education is enshrined at the constitutional level. Article 27 of the Spanish Constitution (Constitution of Spain, 1978) establishes the state's obligation to guarantee citizens' right to education without discrimination on any grounds, including religious beliefs. Similarly, articles 40-41 of the Constitution of Lithuania (Constitution of the Republic of Lithuania, 1992) stipulate that the state ensures the right to free general education, and educational institutions are secular. Article 13 of the French Constitution (Constitution of 4 October, 1958) also guarantees the right of every individual to free education. According to researcher A. Lyubarets (2023), such normative provisions create the foundation for a unified approach to realising educational rights, although the specific mechanisms of implementation vary significantly. For example, France emphasises centralised state regulation, whereas Spain focuses on decentralisation and the delegation of powers to autonomous communities.

T.M. Slinko & E.V. Tkachenko (2023), analysing the legal regulation of the Europeanisation of Ukrainian education, concluded that Ukraine should adopt the experience of constitutional regulation of education from European

countries. It is worth noting that relevant documents of European countries emphasise the state's role not only in providing free education but also in ensuring non-interference in the religious upbringing of schoolchildren. That is, the constitutional principle of secular education is established, meaning the state's neutrality regarding religious matters and the guarantee of each student's right to education regardless of their religious beliefs or lack thereof. This approach is a crucial element in safeguarding human rights and freedoms in the educational sphere and aligns with the core values of the EU, particularly the principles of non-discrimination, tolerance, and respect for cultural and religious diversity. Religious education is provided based on parental choice. The Lithuanian government guarantees that religious education can take place within the framework of state secondary education. For instance, article 40 of the Lithuanian Constitution states: "State and municipal institutions of learning and upbringing are secular. At the request of parents, they conduct religious education" (Constitution of the Republic of Lithuania, 1992). The main provisions of the educational legislation of selected EU countries are presented in Table 3.

Table 3. Features of the normative-legal and organisational support for the right to complete general secondary education in Spain, Lithuania, and France

Country name	Legislative provision for the right to complete general secondary education	Content of laws and regulations ensuring the right to complete general secondary education
Spain	<ul style="list-style-type: none"> ■ Constitution of Spain (1978); ■ Organic Law 2/2006 on Education (2006) 	<ul style="list-style-type: none"> ■ Compulsory and free secondary education (ESO) up to the age of 16. ■ Recognition of the right to education and freedom to establish educational institutions. ■ Three main types of schools: public schools (escuelas públicas), "concerted" schools (escuelas concertadas), and private schools (escuelas privadas). Concerted schools receive state funding and comply with national standards while maintaining certain autonomy in selecting curricula and organising the educational process. ■ Inclusive education for students with special needs – primarily integrated into mainstream schools with provision of support. ■ Language policy: in most autonomous communities, various models of instruction are implemented – from partial bilingual education to full immersion in the regional language (Catalan, Basque, Galician), with mandatory teaching of Spanish (Castilian) as the official state language.

Table 3. Continued

Country name	Legislative provision for the right to complete general secondary education	Content of laws and regulations ensuring the right to complete general secondary education
Lithuania	<ul style="list-style-type: none"> ■ Constitution of the Republic of Lithuania (1992); ■ Education Law of the Republic of Lithuania (1991) (with changes 2011, 2017, 2024). 	<ul style="list-style-type: none"> ■ Compulsory free education up to the age of 16 (primary and basic education). ■ Full secondary education (grades 11-12) is also free, although not mandatory. ■ Universal inclusion approach: obligation to admit children with disabilities to the nearest school. ■ Language rights of national minorities (education in the native language with mandatory study of the state language). ■ Voucher-based student funding (“money follows the student”): the voucher covers educational expenses (teachers’ salaries, learning materials), while private schools independently finance the operational costs of their facilities.
France	<ul style="list-style-type: none"> ■ Constitution of 4 October 1958 (1958); ■ Education Code. (2013); ■ Law of France No. 2019-791 “On a School of Trust” (2019). 	<ul style="list-style-type: none"> ■ Compulsory education from ages 3 to 16 (including école maternelle). ■ Clear educational structure: primary school (école élémentaire), lower secondary school (collège), and upper secondary school (lycée). ■ Inclusion: priority given to educating children with special educational needs in mainstream classrooms (Law of 2005). ■ Private schools under contract – funded from the budget while adhering to the national curricula. ■ Strong emphasis on secular education (laïcité) and French as the sole official language of instruction, although optional regional language programs exist in some areas.

Source: compiled by the authors

The implementation of the right to complete general secondary education in the member states of the European Union is based on the integration of supranational legal norms and strategic guidelines with national legal systems. The legal framework for this right is formed within the broader European context, notably through the provisions of the Charter of Fundamental Rights of the EU, as well as strategic documents such as the Council Resolution on the Framework for Cooperation in Education and Training (2021-2030), which establish common objectives concerning quality, inclusivity, equal access, and mobility. At the same time, the mechanisms for implementation remain decentralised, reflecting national particularities: a centralised model in France and a decentralised one in Spain. The constitutional enshrinement of the right to education, the prohibition of discrimination, and the principle of secularism in educational institutions – with the guaranteed right to choose religious education – ensure that educational policies align with key EU values such as non-discrimination, tolerance, and respect for cultural and religious diversity. Thus, there is a discernible trend toward the formation of unified approaches to the realisation of the right to education within the European legal space, taking into account the national context.

Administrative models of education governance in European countries

European countries exhibit a diverse range of approaches to administrative governance in education, spanning from centralised to decentralised models. This diversity is shaped by each country’s unique historical, political, and social contexts. To harmonise policies across EU member states, particularly in education, the Open Method of Coordination is employed. Its key features include: (1) alignment of common objectives, where member states agree on general guidelines and principles; (2) use of indicators and comparative analysis, developing quantitative and qualitative metrics to assess progress toward goals;

(3) creation of national action plans, with each country formulating its own plan aimed at achieving the agreed objectives; and (4) expert evaluation and monitoring through mutual assessment of member states’ achievements to track and analyse results (Shparyk, 2024). Examining the transformational processes in school education within the European Union, researchers A. Dzhurylo *et al.* (2018) note that decentralisation of education governance is a typical feature across EU educational systems. They further argue that in most developed countries this process unfolds along three complementary pathways: involving the public in addressing education issues, strengthening the role of local education authorities in decision-making, and enhancing schools’ autonomy in managing their resources.

France exemplifies a highly centralised education governance model. The entire education policy is crafted at the central government level, particularly by the Ministry of National Education, which regulates curricula, assessment systems, teacher recruitment, and even certification procedures. As noted by M. Miguéns & M. Douterlungne (2021), this approach ensures uniformity of the educational process nationwide, minimising regional disparities but simultaneously limiting the autonomy of schools and local authorities. The centralised nature of French education has deep historical roots developed over centuries. The state not only establishes general principles but also exercises detailed control over curricula, standards, and teaching methods. Every aspect of educational activity – from curriculum content to teacher hiring procedures – is government-regulated. Teachers in France are public servants, whose selection, training, and professional development are overseen by the state. The government is the sole authority authorised to issue diplomas; certificates issued by private schools lack official recognition unless state-approved (Ministry of National Education..., n.d.).

In contrast, Spain employs a decentralised model distributing authority between the central government and autonomous communities. Seventeen autonomous

communities have the right to approve educational programs, allocate budgets for educational institutions, and appoint school leadership, while the central government is responsible for setting basic education standards. According to the Spanish Ministry of Education (Ministry of Education..., n.d.), this system allows education to be tailored to regional needs but requires high coordination across governance levels.

Lithuania occupies an intermediate position: education policy is formulated at the national level by the Seimas and the Ministry of Education, Science and Sport, but practical implementation is delegated to municipalities. They manage the organisation of the learning process, transportation, meals, teacher support, and infrastructure financing. R. Nesterenko (2022) noted that this model balances strategic national vision with local flexibility in addressing community-level issues.

All three models share a common trend—the involvement of parents and students in governance. In France, this occurs through participation in school councils and consultations in educational decision-making (In the Information..., 2024). In Spain, involvement takes place via school self-governance bodies, and in Lithuania, through local education councils influencing schools' strategic decisions. The publication "Citizenship education in Europe" (2012) highlighted that such participation fosters community responsibility for education and promotes an environment responsive to the needs of education stakeholders.

It is important to emphasise that despite trends toward financial independence and increased autonomy, the role of the state in education governance remains significant across Europe. Researchers A. Yurchenko *et al.* (2022) underlined that strong state control characterises European education systems. This approach ensured the unity of the educational space, compliance with minimum quality standards, and social equity in resource access. Most countries operate hybrid systems where core funding is centralised through state subsidies, while municipalities or regions handle infrastructure development, school maintenance, and adaptation of educational programs to local needs. Lithuania serves as an example, where education funding follows a "money follows the student" principle, and local authorities are responsible for providing material and technical resources. Education is a state priority and is funded at all levels. Secondary education financing is based on the cost of basic education, aligned with the implementation of curricula (also known as the "class basket"). This means approximately 80% of funding is allocated according to class size rather than per student (as before), with a small portion earmarked for textbooks and learning materials according to actual student numbers. Municipalities allocate the remaining – less than 20% – to organising and managing the educational process, providing educational support, and evaluating learning outcomes (Lithuania: Secondary..., 2024). Thus, government funding covers the majority of educational needs, ensuring equal rights to education across all regions of the country.

In France, the state centrally formulates education policy and finances teachers' salaries, while local self-government bodies are responsible for the operation of schools, particularly at the primary level. Funding is predominantly sourced from the national budget, which ensures equitable access to education throughout the country (In the Information Procedure..., 2024). Spain exemplifies a symmetrical distribution of powers: autonomous communities possess broad competencies in financing and management but operate within the framework of national objectives and standards. Regional budgets of the autonomous communities cover the majority of expenditures for general secondary education, taking into account the specific characteristics of each territory (Dzhurylo *et al.*, 2018).

Ukrainian researchers, analysing these models, emphasise the relevance of their implementation in the Ukrainian context. For instance, in the work of A. Yurchenko *et al.* (2022), the importance of an institutional approach to managing school financing was highlighted, based on a combination of state regulation and school autonomy, alongside the mandatory introduction of an expenditure efficiency assessment system. The authors also drew attention to the need for greater transparency in the distribution mechanisms of educational subsidies and improvements in inter-budgetary transfers. Similarly, O.A. Demyanyshina *et al.* (2023) stressed the importance of utilising international experience in financing general secondary education, particularly through targeted grants, public-private partnership mechanisms, and financial incentives for schools in rural and disadvantaged regions, which allow for more effective equalisation of access to quality education across territories.

For Ukraine, which is undergoing a decentralisation process, it is crucial to consider Spain's experience in devolving powers to local communities as well as Lithuania's example of effective cooperation between central authorities and municipalities. At the same time, centralised elements, as seen in France, may be appropriate for unifying educational standards at the national level. A combination of these models will enable Ukraine to achieve a balance between flexible governance and nationwide educational quality.

Practices of inclusivity, mobility, and vocational education

One of the key values of the European Union's educational policy is ensuring equal access to education for all population groups, particularly vulnerable ones. All EU member states adhere to the principles of inclusion, integration, and mobility as fundamental components of the modern European educational model. Inclusive education is increasingly regarded not only as an element of the contemporary humanistic educational paradigm but also as a clearly established international legal obligation of states, especially those within the European Union. All EU member states have ratified the UN Convention on the Rights of Persons with Disabilities (2006), which in article 24 mandates that states provide inclusive education at all levels and guarantee that "persons with disabilities are not excluded from

the general education system on the basis of disability". The formation of an inclusive educational environment in Europe is based on the principles of human rights, equal opportunities, and social cohesion, the implementation of which requires systematic intersectoral cooperation.

In France, the inclusive education system provides support for children with special educational needs through the mechanism of a personalised schooling plan (PPS – *Projet personnalisé de scolarisation*), the involvement of student assistants (AESH – *Accompagnants des élèves en situation de handicap*), and the establishment of inclusive units called ULIS (*Unité localisée pour l'inclusion scolaire*) within mainstream schools. These elements are defined in the Education Code and legislation (Law of France No. 2005-102, 2005; Education Code, 2013). The inclusive education model in France is founded not only on legislatively enshrined provisions but also on the operation of an extensive support system that includes mainstream educational institutions, specialised medico-psychological services, and local government authorities. Educational programmes in France were adapted to the needs of various social groups, including children with special educational needs (SEN), children from migrant families, and members of national minorities. The state funds special programmes and ensures the training of educators who work with these categories of students (France: Special Education..., 2024). Inclusion is a significant principle of secondary education in France, to which the second chapter of the Education Code is dedicated (Education Code, 2013). The education of each child with SEN follows an individualised plan approved by the parents (and, if possible, the student themselves). These children also have the opportunity to complete upper secondary education and receive vocational training. Furthermore, according to legislation, "the state education service ensures the presence in each institution of one or more coordinators or referents for the admission of children with nervous system disorders to facilitate better integration into the regular environment".

In accordance with the updated version of the Education Law of the Republic of Lithuania (1991), guarantees the right of children with SEN to study in mainstream schools by implementing practices of individualised learning and support through special educators and speech therapists. Particular importance is given to cooperation between municipalities and psychological services, reflecting the interdepartmental nature of inclusion. Within municipal responsibilities, transportation to schools, free meals, and support for students with SEN are organised, including the adaptation of curricula to individual student needs, access to assistive devices, technical equipment, additional educators, psychologists, and assistants (Overview: Lithuania, 2024). However, as noted by R. Nesterenko (2022), the country faces a shortage of specialists for the full implementation of inclusion. The Lithuanian government acknowledges certain shortcomings in fully ensuring the right to secondary education, especially concerning inclusive education. Open recognition of these issues fosters

targeted efforts to address them, aiming to guarantee all children equal access to secondary education. Simultaneously, the system envisages active involvement of parents and the community in managing inclusive programmes.

In Spain, following the adoption of the educational reform LOMLOE, a clear course has been set for integrating children with SEN into mainstream schools, with corresponding funding and an enhanced role for autonomous communities in the practical implementation of inclusion (Organic Law No. 3/2020, 2020). The Spanish model of inclusive education combines centralised regulatory requirements with regional autonomy, allowing flexible adaptation of educational practices to the social inclusion needs of local communities.

Thus, inclusive education in EU countries functions as a legal norm, a political commitment, and a practical strategy of state governance aimed at ensuring equal access to full general secondary education. Each country has chosen its own approach to implementing inclusion, taking into account national contexts, levels of decentralisation, and legal frameworks. Key factors for success include the availability of adequate financial mechanisms, professional support, and legally enshrined guarantees. The experience of these countries demonstrates the necessity of a comprehensive approach to inclusive policy, encompassing both legal and practical dimensions.

Equally important is the issue of providing quality education to children from remote and sparsely populated regions. In Spain, educational institutions are allowed to add or modify subjects within the standard curricula to adapt them to the needs of local communities (Overview: Spain, 2024). Special attention is paid to pupils in rural areas and on islands, for whom specific logistical and pedagogical solutions are provided. The particularities of rural and island schools are considered, ensuring they have the necessary resources and organisational systems to meet their special needs and guarantee equal opportunities. In rural and island areas where deemed appropriate, schooling may be conducted in a municipality near the student's place of residence to ensure educational quality (Spain: Secondary and post-secondary education, 2025).

Spain's decentralisation of educational governance shows that delegating certain powers to the local level allows for more effective responses to regional needs and community involvement in educational management. Particular focus is given to supporting schools in remote areas and communities with low student populations. Spain emphasises the necessity of equipping such institutions with adequate resources, qualified teachers, and modern infrastructure, thereby guaranteeing equal access to quality education. This approach accounts for the country's territorial fragmentation, uneven population distribution, and varying levels of infrastructure provision for educational services. Students in geographically vulnerable regions face limited access to secondary and specialised education, inclusive services, qualified teaching staff, and digital resources. In light of this, the Spanish Education Law

(Organic Law No. 3/2020, 2020) provides for compensatory measures aimed at guaranteeing equality of access to quality education for all population groups regardless of their place of residence. This strategy contributes to reducing educational inequality, supporting socially vulnerable groups – including national minorities and children with SEN – and ensuring territorial balance within the country's educational space. According to the Government of Spain (n.d.), students have the opportunity to choose schools not only based on their place of residence but also according to the school's educational profile, technological equipment, and level of inclusivity, thereby enhancing accessibility and competitiveness of educational institutions.

For Ukraine, this could serve as a foundation for addressing the issue of inequality in access to educational services between urban and rural areas. It is essential to intensify focus on small-scale rural schools by creating additional incentives and resources for them. This may include the introduction of mobile educational centres, equipping such schools with modern technologies for distance learning, as well as attracting qualified teachers through specialised support programmes. Ukraine needs to enhance attention to small rural schools by providing them with extra incentives and resources. This could encompass implementing mobile educational centres, outfitting these schools with state-of-the-art technologies for remote learning, and recruiting qualified educators via dedicated support initiatives.

A pressing issue for European education is the provision of secondary education for refugee children. A critical element in this context is their linguistic adaptation. In France, Spain, and Lithuania, this forms an integral part of integration policies aimed at ensuring the effective inclusion of newcomers within the education system. Each of these countries employs different mechanisms aligned with their national approaches to integration, levels of decentralisation, and resource capabilities. In France, specialised units – UPE2A (Unités pédagogiques pour élèves allophones arrivants) – operate for migrant children, offering intensive French language instruction alongside integration into mainstream classes. Textbooks and learning materials are adapted for allophone students, and support continues until they achieve sufficient language proficiency (Overview: France, 2025). In Spain, schools provide “aulas de enlace” (transition/adaptation classrooms) for foreign children who do not speak Spanish. In these classes, students acquire language skills and gradually integrate into the main curriculum. The language policies of bilingual regions (Catalonia, Basque Country, Galicia) require adaptation not only to Spanish but also to regional languages, presenting additional challenges (Overview: Spain, 2025). In Lithuania, preparatory groups or individual Lithuanian language lessons are organised for refugee children to facilitate linguistic adaptation. Upon completion of the adaptation period, they join mainstream classes. Educational institutions often provide psychological and social support to help students adapt not only linguistically but also emotionally and culturally (Overview: Lithuania, 2024).

Alongside strengthening inclusive approaches, the educational policies of EU countries increasingly focus on adapting general secondary education to labour market needs, which drives the enhancement of vocational components within its structure. Rather than the traditional model, where secondary education mainly fulfilled academic and preparatory functions for higher education admission, there is now a rethinking of secondary education as an autonomous level capable of fostering essential life skills, civic competencies, and foundational professional qualifications.

Thus, in France and Spain, models are implemented whereby general education programmes are supplemented by vocational modules, enabling students to simultaneously obtain a full general secondary education certificate and a basic vocational qualification. This fosters differentiation of educational trajectories and increases individualisation of the learning process, responding to contemporary labour market demands. In Lithuania, this integration is even more pronounced: vocational training elements are introduced within compulsory secondary education, promoting early identification of students' abilities, boosting motivation to learn, and reducing risks of early school leaving. Furthermore, the division of general education into three levels – ISCED-1 (primary), ISCED-2 (lower secondary), ISCED-3 (upper secondary) – allows learners to attain the level suited to their needs. Notably, unlike most EU countries where vocational education is the final, non-compulsory level of secondary schooling, in Lithuania it begins during the last two years of compulsory secondary education, thereby supporting comprehensive personal development (Lithuania: Secondary..., 2024). Accordingly, general secondary education serves not only academic but also preventative, orientational, and socialising functions. In summary, contemporary general secondary education in EU countries increasingly operates as a multifunctional space for cultivating key competencies, providing students with conditions for educational self-determination, adaptation to shifting socio-economic circumstances, and further professional growth.

Another vital component is the promotion of educational mobility – the ability of students to continue their studies in another EU country without losing academic status. This is realised through the harmonisation of curricula, unified assessment approaches, and support for multilingual environments in schools. As noted by S. Gaušas *et al.* (2022), the practice of implementing “European hours” fosters the development of European identity and intercultural integration. For the European Union, a priority task is creating a common educational space that ensures students can continue their education in any member state if necessary. To achieve this, the European Council defines core competencies that learners should master and establishes fundamental approaches to integrating member states' education systems. The European Commission actively supports these processes by funding various programmes aimed at introducing innovations in school education. Particular attention is given to establishing multilingual classrooms, addressing the issue of forced interruptions in

education, fostering healthy school environments, and organising international programmes for teacher training and experience exchange. Moreover, EU institutions, in cooperation with national governments, back initiatives aimed at further integrating member states' school systems and improving specific aspects of the educational process, such as the use of digital technologies, development of inclusive education, and adaptation of curricula to contemporary societal challenges (Lyubarets, 2023). This approach promotes the harmonisation of education systems across Europe and guarantees equal access to quality education for all students, regardless of their country of residence.

Comparison of the educational systems of France, Spain, and Lithuania within the European educational area

Analysis of the implementation of the European education area in the sphere of complete general secondary education demonstrates that the governance context significantly influences the accessibility, inclusivity, and quality of educational systems in EU countries. France maintains a centralised governance model, where the state sets educational standards and funds schools, while municipalities are responsible for infrastructure. Individualised support programs (PPS/PPRE) and the existence of inclusive ULIS classes have succeeded in integrating over 80% of students with special educational needs (SEN) into mainstream schools, underscoring the effectiveness of the centralised system in providing access to secondary education even for vulnerable groups (Overview: France, 2025). In Spain, secondary education operates under a decentralised

decentralised model: the national law LOMLONE (Organic Law No. 3/2020, 2020) establishes the framework, while autonomous communities implement policies adapted to local conditions. Although autonomy facilitates regional adaptation, it also generates inequality: infrastructure quality, staff training, and inclusivity vary significantly between communities (Overview: Spain, 2024). Lithuania has a hybrid governance model: policy principles are centrally formulated, while municipalities implement them through a “pupil basket” funding mechanism. This creates a balance between national equality and local adaptability. However, as reports indicate, there remains significant disparity between urban and rural schools, with infrastructure and support for SEN children still weak in certain districts (Overview: Lithuania, 2024). Thus, the implementation of the European Education Area in France, Spain, and Lithuania confirms that system effectiveness depends on balancing centralised regulation, local autonomy, adequate resource provision, and a focus on inclusivity.

To systematise national approaches to the legal framework ensuring the right to complete general secondary education, a structured comparison of the legislative provisions of Spain, Lithuania, and France was conducted. Table 4 presents the main regulatory acts governing this sphere in each country and outlines key features of their substantive content. This format allows for summarising existing models of legal regulation and provides a foundation for further analytical reflection on the potential adaptation of corresponding European practices within the context of Ukraine's national education policy.

Table 4. Comparative table of education systems in Spain, Lithuania and France

Parameter	Spain	Lithuania	France
Management model	Decentralised (autonomies possess educational authority)	Mixed: strategy is national, implementation is by municipalities	Centralised (management through the Ministry of Education)
Legal framework	The Constitution of Spain, the Education Act	The Constitution of Lithuania, legislation on education	The Constitution of France, the Education Code
Education funding	Mainly at the level of autonomous regions	Mainly centralised, with elements of local co-financing	Mainly centralised with subsidies to private schools
Inclusion and support for persons with special educational needs (SEN)	Special conditions for rural and island schools	A system has been developed that includes: the right to education at the place of residence, an individual learning programme, the formation of teams of special pedagogical and psychological support and a student assistant, but there is a shortage of specialists.	Individual educational pathways – PPS – are developed with the participation of an interdisciplinary team (MDPH commission – Maison Départementale des Personnes Handicapées). Support for persons with disabilities – AESH profession – support worker for students with disabilities. Funded by the state. Specialised ULIS classes within mainstream schools, where part of the teaching is adapted and part is integrated with the main class. Institutional support Regional academic education authorities (académies) are responsible for implementing inclusion policies at the local level.
Professional education	Within the framework of comprehensive secondary education (upper secondary school)	It begins within the framework of compulsory education.	General, technological and professional areas in the final stage of school
Public participation	Active participation of parents and students in school self-government	Participation of local councils, parents and community organisations in policy development	Participation through school councils, Cnesco (Centre for Educational Research)
Language adaptation	Not highlighted as a separate programme	Implemented through support for students from different regions	Special classes for migrants (UPE2A), intensive French language learning

Source: created by the authors based on an analysis of educational legislation

The conducted comparison of the legal and regulatory foundations for implementing the right to complete general secondary education in France, Lithuania, and Spain revealed the presence of different models of governance, financing, and inclusion organisation, which could be valuable for adaptation in the Ukrainian context. A common feature across all three countries is the legal establishment of compulsory basic education, as well as the existence of legal mechanisms supporting children with special educational needs (SEN). At the same time, Lithuania predominantly employs a decentralised financing model based on the principle of “money follows the student,” granting municipalities greater authority over the management of educational infrastructure. This practice of delegating powers related to infrastructure and financing to municipalities demonstrates the effectiveness of decentralisation while maintaining unified national standards. France exhibits a high level of centralisation in educational policy, combined with legally guaranteed inclusion at all levels. This experience could be useful for Ukraine in strengthening a systemic approach to ensuring equal access to education. Spain, meanwhile, implements a hybrid model that combines unified national standards with regional governments’ autonomy in implementing educational programs. This model allows for adapting educational policy to linguistic, cultural, and social particularities, which is especially relevant for Ukrainian regions with diverse demographic compositions.

Rationale for the relevance of considering this experience for Ukraine

Given that successful integration of the Ukrainian education system into the European and global educational space requires Ukraine to shape its educational policy in accordance with global trends (Kremen *et al.*, 2020), it is advisable to consider the experience of Spain, Lithuania, and France in ensuring the right to complete general secondary education. These countries implement a range of practices that can be effectively adapted within the Ukrainian educational context. Despite differing governance models – from the high centralisation in France to the decentralised management in Spain – they have demonstrated effective instruments for ensuring accessibility and inclusivity in education.

Foremost, Ukraine should pay particular attention to Spain’s experience of granting substantial powers to local self-government bodies in educational management (Spain: Secondary and post-secondary..., 2025). This approach allows for better accommodation of regional specificities, enhances decision-making flexibility, and brings services closer to the end-user. According to the Ministry of Education, Vocational Training and Sports (n.d.), effective decentralisation requires the preservation of unified national standards and regular interregional coordination – principles that could also be implemented in Ukraine within the framework of its ongoing decentralisation reform.

Turning to the topic of decentralising public education administration in Ukraine, O.M. Potapova (2024) identified a key issue as inadequate coordination among government

authorities, educational stakeholders, and civil society organisations aimed at aligning the needs of educational service consumers with the state’s human capital development goals. The researcher emphasised that this problem is exacerbated by the institutional weakness of local self-government, a challenge that has become even more pronounced amid wartime conditions. A.O. Yarosh (2018), after analysing European experiences in organising general secondary education in developed countries, concluded that Ukraine should transfer as many management functions as possible to the operational level – that is, to the general education institutions themselves – granting them maximum autonomy in decision-making concerning school management and financial resources. The researcher underscored the importance of school autonomy in financial management and a strategic approach to modernising the learning environment. Such measures would positively impact the quality of educational services and the efficiency of resource utilisation.

Complementing this, the findings of O.A. Demyanyshina *et al.* (2023) demonstrated the effectiveness of European budgetary financing models, particularly the subsidy-based approach, mechanisms of financial decentralisation, and targeted educational investments. The authors highlighted education’s role as a driver of sustainable development, noting that funding general secondary education in the EU is regarded as a strategic investment in human capital. Incorporating these practices could enhance the effectiveness of Ukraine’s state education policy, especially in the context of post-war recovery, expanding community autonomy, and the imperative to provide quality and accessible education for all.

The Lithuanian experience is especially valuable in the context of cooperation between central authorities and municipalities. Owing to a model whereby the Seimas and government define the overarching strategy and municipalities are responsible for its implementation, equal access to education is ensured across all regions. This approach is particularly relevant for Ukraine given the significant disparities between urban and rural schools, as well as the need to restore educational services in war-affected communities.

Since 2019, France has operated a national centre for evaluation, analysis, and support of state education policy – the French National Education Research Centre (Cnesco) (Who are we?, 2023). Its primary objective is to foster a deeper understanding of the functioning of both French and international school education systems and to disseminate educational research findings aimed at raising academic achievement levels among all students. This organisation acts as a liaison between the research community, educators, and policymakers, facilitating interaction between theoretical knowledge, practice, and strategic educational decisions. The existence of such an institution, funded by both government and private donors, enables the assessment of access to quality education nationwide, the analysis of new foreign approaches, and the introduction of best practices into the national system. The French

model merits attention for its unification of educational programmes, quality control mechanisms, and the establishment of systems for linguistic and inclusive adaptation for vulnerable groups. The creation of specialised classes, teacher training for working with children with special educational needs, and the development of national monitoring mechanisms (as exemplified by Cnesco) are practices potentially highly beneficial for Ukraine, particularly in light of the large numbers of internally displaced persons, children with disabilities, and socially vulnerable learners.

Moreover, the practice of combining general and vocational education, as implemented in France, Spain, and Lithuania, could be instrumental in revising Ukraine's educational trajectories. This approach enables the provision of both broad cultural preparation and early professional orientation. Taking this experience into account would allow Ukraine to build a balanced system that combines state standards with local flexibility, legal protection of educational rights with practical implementation mechanisms, inclusivity with competitiveness. As noted by A. Lyubarets (2023), the unification of the educational space at the level of basic standards does not preclude diversity in the forms of education organisation; on the contrary, it creates conditions for flexible realisation of the rights of students and parents within specific social contexts. Such a strategy will ensure genuine, rather than merely declarative, access to complete general secondary education for all citizens of Ukraine.

Adaptation of the implementation mechanisms of EU countries' educational policies in the context of ensuring the right to complete general secondary education in Ukraine

The conducted analysis indicates that EU countries have established public policies in the field of education, an essential component of which is the experience in management support and implementation of the right to complete secondary education. This experience encompasses both strategic approaches to shaping educational policy and practical mechanisms for its implementation at the central and local levels. European countries demonstrate a high capacity to reconcile nationwide goals with regional specificities, ensuring accessibility and quality of education even in the most remote areas. They employ flexible governance models that combine decentralisation, stakeholder participation, and ongoing monitoring of the effectiveness of decisions taken. To implement this experience within Ukraine's educational process, it is necessary to delineate its key components and particularities of implementation, taking into account Ukrainian realities, institutional capacity, as well as the priorities of national development and the European integration course. The recommendations below are aimed at adapting and integrating the best management practices of EU countries into the national system of complete general secondary education.

First, it is essential to adapt Ukraine's regulatory and legal framework to European educational standards and

organisationally implement the best practices derived from the outlined EU experience. This entails not only modifying the content of educational legislation but also introducing procedures that ensure the right to education in accordance with principles of accessibility, non-discrimination, student autonomy, and civil society engagement. In particular, current legislative acts should be reviewed to clarify the roles of central and local authorities in educational governance, as well as to establish mechanisms that allow flexible application of EU best practices within the school environment.

Second, advisory bodies should be established, comprising state officials as well as lawyers, academics, parents, representatives of the teaching community, and possibly students. Their activities would focus on analysing educational legislation, developing proposals and amendments, discussing issues related to ensuring quality secondary education, and formulating recommendations for their resolution while considering the needs present at the local level. The involvement of diverse stakeholders will enhance the legitimacy of managerial decisions and align educational policy with the real needs of communities.

Third, the role of parents, teaching staff, and students in the governance of general secondary education institutions (GSEIs) and the local education system should be strengthened, as is characteristic of most European countries – especially those with decentralised systems. European experience confirms the effectiveness of such approaches in decentralised governance models where school communities possess tangible tools to influence local educational policy. Parental participation in supervisory boards, pedagogical self-governance, and student organisations can serve as platforms for fostering social partnership within the educational environment.

Fourth, although steps have already been taken in Ukraine to integrate vocational education as part of the final stage of general secondary education (scheduled for full implementation by 2027), it would be advisable to conduct a detailed analysis of the experience of each respective country. Particular attention should be paid to the French model, which offers expanded opportunities for students to choose educational trajectories at the stage of obtaining complete general secondary education. This approach facilitates individualised learning, enhances student motivation, and ensures a closer link between education and the labour market.

Reforming inclusive education is also appropriate. Inclusive education has been introduced in Ukraine for several years, with ongoing work involving children with special educational needs (SEN). However, to better guarantee their right to complete secondary education, it would be advisable—drawing on Lithuanian experience—to differentiate categories of specialists working with distinct groups of inclusive children, since currently the position of teacher assistant in Ukraine lacks specific qualification criteria. Furthermore, based on the French experience, children with SEN within general secondary schools should be provided the opportunity to receive vocational education depending on the nature of their inclusion.

Ukraine's education governance practice should incorporate selected achievements of the examined countries, in particular: increased focus on remote regions to ensure quality education not only in urban but also rural areas (Spanish experience); clear delineation of the volumes of state funding and funding from local self-government bodies for the education system; specification of spheres of responsibility (Lithuanian experience); codification of the educational sector (French experience); and clear division of powers regarding educational governance among central executive authorities, state bodies at the local level, and local self-government (French experience).

■ Conclusions

This article analyses the legislative framework ensuring citizens' right to complete general secondary education and the powers of public authorities in EU member states regarding its implementation. The experiences of Spain, Lithuania, and France are examined as examples demonstrating both the diversity of educational systems and the simultaneous European harmonisation. A review of scholarly literature on the subject reveals that the managerial aspects of securing the right to complete general secondary education in EU countries currently lack systematic coverage. Key issues include the coexistence of two funding models – public and private – various degrees of decentralisation in educational governance, and the specific emphasis on certain components of ensuring this right.

The legal framework and organisational mechanisms for guaranteeing citizens' right to complete general secondary education have been considered. Analysis of legislative acts and educational management models across EU countries allowed identification of several common characteristics of the European educational space. Chief among these are constitutional recognition of compulsory and free education as a fundamental personal right. This right is ensured through the possibility of continuing education after basic schooling (i.e., upper secondary, specialised or academic education). The educational process prohibits any form of discrimination based on gender, race or ethnicity, religion or beliefs, disability, age, or sexual orientation. The right to complete general secondary education is also guaranteed through adherence to democratic principles in educational organisation, including granting autonomy to educational institutions, involving students and parents in governance,

ensuring free basic secondary education, and implementing principles of inclusiveness and state neutrality in religious matters. The managerial features of ensuring the right to complete general secondary education in Spain, Lithuania, and France are revealed through indicators such as the level of centralised educational governance, sources of funding, adherence to inclusiveness principles, vocational orientation of students, public participation in educational management, and overcoming language barriers. Decentralised educational governance systems granting local self-government bodies advantages in organising the educational process are illustrated by Spain and Lithuania. France exemplifies a centralised educational governance system where the state regulates all aspects of educational activity – setting general principles, defining curriculum content, teaching methodologies, and education quality standards. As teachers are civil servants, their educational activities and professional development are controlled by the government.

For Ukraine, especially in wartime conditions characterised by numerous displaced persons, socially vulnerable students, and extraordinary learning circumstances, the Lithuanian experience of cooperation between central authorities and municipalities is particularly relevant. The French model is also beneficial, where a national centre for evaluation, analysis, and support of state education policy (Cnesco) functions to unify curricula and coordinate with foreign school education systems. The Spanish experience in organising education in rural areas and islands is advisable to consider, particularly given the needs of small rural schools in Ukraine. This approach could involve creating additional incentives for resource support for these educational institutions. Future research on this topic, as raised in this article, may focus on developing pathways for implementing normative legal acts and European educational democracy standards into Ukrainian practice.

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Управлінські аспекти забезпечення права на повну загальну середню освіту: досвід країн ЄС

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■ **Анотація.** У статті досліджено повноваження та діяльність органів публічної влади країн-членів ЄС (на прикладі Іспанії, Литви та Франції) щодо забезпечення права громадян на повну загальну середню освіту. Для Європейського Союзу пріоритетним завданням є створення спільного освітнього простору. Країни ЄС визначили забезпечення доступної та якісної середньої освіти як один із пріоритетів, розробили механізми для інтеграції цього права у свої законодавчі та управлінські практики, застосовуючи комплексний підхід, який включає ефективну взаємодію між центральними та місцевими органами влади, інвестиції в освітню інфраструктуру, підтримку інклюзії та впровадження інноваційних освітніх методик. Особливістю європейської освіти є залучення учнів та батьків до управління освітніми закладами, що дозволяє створювати таке освітнє середовище, яке б задовольняло споживачів освітніх послуг. Виявлено, що у країнах ЄС функціонують два підходи до організації середньої освіти: лінійна та поетапна, а також існують відмінності в функціонуванні моделей управління системами освіти, що відображають унікальні історичні, соціально-економічні та політичні особливості кожної країни. Розкрито управлінські особливості децентралізованих систем управління освітою в Іспанії та Литві, де суб'єктами забезпечення права громадян на повну загальну середню освіту виступають також органи місцевого самоврядування. На прикладі Франції продемонстровано централізовану систему управління освітою, де держава регулює всі аспекти освітньої діяльності – від визначення змісту навчальних програм до встановлення загальних принципів і стандартів якості освіти. Сформульовано рекомендації для оптимізації вітчизняної системи забезпечення права громадян на повну загальну середню освіту відповідно до кращих управлінських практик Іспанії, Литви та Франції

■ **Ключові слова:** публічне управління; зарубіжний досвід; доступ до освіти; якість освіти; управління освітою