While the regulation for the future Erasmus+ programme should be adopted shortly, EUCIS-LLL launched an internal consultation and wishes here to share a synthesis of key elements that request further attention from decision-makers when drafting the users’ guide.

Structure

- EUCIS-LLL members are mainly concerned about the structure of the guide after the adoption of the legal basis. They insisted on the need to make it user-friendly and simple and some suggested an approach by target groups rather than by sectors.

Objectives and Priorities

- EUCIS-LLL members welcomed the reintroduction by the Parliament of policy frameworks such as the Copenhagen process or the European Agenda for Adult Learning in the legal basis. Even though those may not be kept there, they should be included in the users’ guide objectives in order to have better synergies between the programme and policy priorities.

- Besides, the Parliament had introduced specific objectives for education and training, mentioning personal development, social cohesion and inclusion of vulnerable groups at risk of educational disadvantage or equal access to quality education. Those are essential values to insert in the guide. Some suggested to add sectorial objectives for each field of education and training as proposed by the European Parliament (i.e. acquire learning to learn skills for pupils under Comenius, etc) in the guide.

- As for priorities, EUCIS-LLL members would recommend to make them sufficiently comprehensive and not geographically targeted in order to ensure a lifelong learning and quality-based approach (i.e. mobility across educational fields in third countries). As priorities are defined annually, members proposed a focus next year on youth unemployment, quality teaching and learning and flexible learning pathways and non-formal and informal learning (i.e. validation), social inclusion (i.e. early-school leaving or disability), intercultural learning, active citizenship and democratic participation (2014: European Parliament elections and 100th anniversary of WWI). Members also insisted on the importance of dissemination of successful projects outcomes, as it’s very difficult to mainstream the results from project into systematic funding.

- Besides, EUCIS-LLL members call for the suppression of additional national priorities for multilateral projects. It has become extremely difficult for some projects involving numerous partners to match all priorities requested by their respective National Agencies. We do understand the necessity of such priorities but their intrinsic lack of consistency have hindered the building up of quality consortia and limited the diversity of projects’ outcomes.

- EUCIS-LLL members expressed the wish to be associated to the selection of annual priorities, for instance in the framework of the European Education, Training and Youth Forum or via a stakeholders’ consultation by the Programme Committee.
Key Action 1: Learning mobility of individuals

- Providing that this Key Action encompasses mobility schemes for various learners in formal and non-formal learning settings, EUCIS-LLL members are concerned about the organisational approach adopted. The first interrogation concerns the eligibility criteria: if individuals cannot apply for grants anymore, then it is important that individuals from another country than the one their institution/organisations is registered can participate.

- Besides, this organisational approach entails the providing of an overview of the organisation’s European vision and plans. As good as this is for the consistency of European action within a single organisation, EUCIS-LLL members warn against such European development plans. Beyond the administrative burden, those plans will operate a shift of responsibility from, for example in the case of Comenius, teachers to school heads. In practice, teachers are generally the most motivated by European opportunities, the most aware of educational contents and the most disposed to spend loads of volunteer time in projects. This approach of learning mobility may therefore lead to a devaluation of teachers’ work and a decrease of European projects.

- As for staff mobility, EUCIS-LLL members insisted on the need for the broadest range possible of easily accessible opportunities, especially in sectors including a high diversity of target groups such as adult education (freelance teachers and trainers, volunteers...).

- In order to develop innovative mobility schemes within the next programme, EUCIS-LLL would suggest building on the proposals made by the European Parliament during the negotiations. For instance, specific funding could be allocated to “voluntary dissemination of information by individual learners” (see Erasmus in Schools, ESN’s 2013 good practice). The Parliament had also evoked the idea to combine studies and traineeships for exchange students. More synergies could also be developed with DG Enterprise and Industry’s “Erasmus for Young Entrepreneurs”. EUCIS-LLL members also highlighted the importance of keeping the broadest range possible of adult mobility schemes including senior volunteering, that have a high individual impact that should not be neglected in times of crisis where social inclusion and labour market reinsertion are so important.

- In a general manner, EUCIS-LLL members call to ever improve the quality of mobility experiences and focus the guide on a detailed description of the preparation (i.e linguistic) and follow-up phases (especially on the recognition of learning outcomes).

- EUCIS-LLL members also insisted on making systematic special provisions for disadvantaged learners so that their equal access to learning mobility is guaranteed in the best conditions.

- EUCIS-LLL members warned about the eligibility of labour market actors (i.e. enterprises) to some mobility projects and other new programme actions. This should be strictly regulated in order to avoid the use of the programme by private actors to cover costs such as work placements. For education and training, only educational stakeholders should be able to apply as coordinators.
Key Action 2: Cooperation for innovation and the exchange of good practices

- It seems that the Strategic Partnerships under this action also encompass mobility schemes and EUCIS-LLL members have been confused about the distinction. Which mobility opportunities will be exactly available in Key Action 2, for which target group (should be as inclusive as possible and detailed on eligibility criteria; third countries should also be able to participate), by which coordinating organisation and on what content? Members welcomed the flexibility announced by the Commission but this needs to be urgently clarified, and the role of civil society organisations needs to be enhanced there.

- EUCIS-LLL members are also highly concerned about the management of Strategic Partnerships by National Agencies. They are very doubtful that it is a good solution for several reasons: big partnerships may have strong links with European policy priorities but get discriminated against because they do not fit national priorities; besides, this will clearly overburden the Belgian National Agencies with a high number of European organisations applying and leave uncertainties on the way the cooperation will work, even with additional financial and human resources (i.e. discrimination of applications in English, evaluation modalities…). The Council and Parliament have reintroduced in the legal basis (Article 22) the possibility to manage the Strategic Partnerships at Union level and EUCIS-LLL members strongly call the Commission to split their management with the EACEA (i.e. annual calls for large scale transnational partnerships).

- EUCIS-LLL members would also like to ensure that long-term projects with a large scope of activities and a broad range of partners are still possible under the Strategic Partnerships. At the same time, smaller partnerships should also be given a maximum number of opportunities as they have a strong individual and organisational impact.

- Besides, members wish to see that those partnerships truly allow cross-sectorial projects. It seems that in the approved legal basis the mention of youth organisations for instance will be removed entirely from the Education and Training chapter (also in cross-sectorial KA2). At the same time in the youth chapter, the partnerships in KA2 seem to point much less to cross-sectoriality, while this was an initial encouragement of the new programme. The guide should certainly allow cooperation between education and training sectors (i.e. VET/HE) but also with youth and sport (i.e. between schools and youth NGOs).

- Concerning Knowledge and Sector Skill Alliances, EUCIS-LLL members insisted on the need for high quality assurance with a better information and preparation for enterprises. Quality labels and awards should be continued. These would reflect the successful implementation of the quality assurance support tools developed within past EU projects.

- EUCIS-LLL members also showed interest for the capacity-building activities and imagined already some potential actions (i.e. European VET institutions providing guidance to their third country peers on EQF, ECVET, EQUAVET…). Yet they are quite concerned that those activities would only take place with third countries. Grundtvig and Comenius in-service training for instance should be maintained in the programme with the possibility of addressing multi-target groups as some issues require action from different partners.

- As for IT platforms, EUCIS-LLL members suggested innovative scopes of action such as the offer of targeted services to project implementers such as online learning, partnership building or dissemination of successful outcomes. They also expressed the wish to see them extended to various sectors (such as EPALE that also aims to reach CVET staff and trainers).
Key Action 3: Support for policy reform

For the detailed actions proposed by EUCIS-LLL under KA3, see the document “EUCIS-LLL – Programme Guide – KA3”.

- EUCIS-LLL members are satisfied that the mention of a support to European education and training NGOs have been reintroduced in the legal basis but wonder why this was placed along with recognition tools. They call the Commission to avoid the amalgam in the users’ guide and make a separate action for European NGOs (see EUCIS-LLL proposal).

- A separate action line should be provided for European NGOs and for umbrella trans-sectorial platforms. Members also lack a proper definition of a European education and training NGO in the legal basis.

- The members also urge the Commission to release quickly the calls for this support. The more their publication is delayed, the longer the period without any EU funds in 2014 will be and most of them do not have enough own resources to survive on their own. Many have already sent resignation letters to their staff. Members are also worried about the scope, duration and amount of their future grant.