

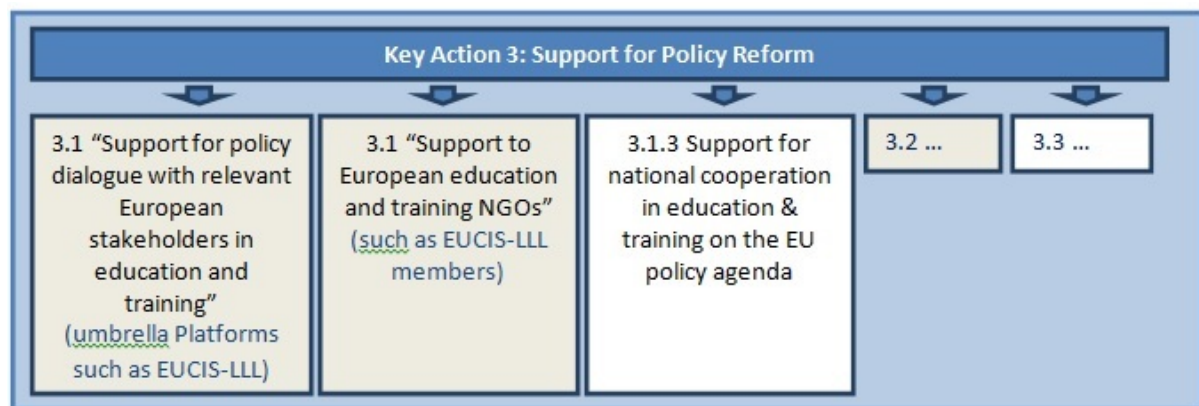


Erasmus +: Key Action 3 “Support for Policy Reform” Support to EU-wide networks and European E&T NGOs

As triologue negotiations are now coming to an end, EUCIS-LLL wishes to provide **an input on the architecture of the Erasmus+ programme** based on the legal basis adopted, and especially on its **Key Action 3: “Support for policy reform”**. EUCIS-LLL would like to initiate a reflection in collaboration with the European Commission on the role that civil society organisations and platforms at national, European and pan-European level could play in 2014-2020. Civil society organisations are directly interested by Key action 1 “Learning mobility” and Key action 2 “Cooperation for innovation” and EUCIS-LLL has already made some proposals on how to concretely improve the management and functioning of such actions. However EUCIS-LLL feels that Key Action 3 deserves a special attention as it will support “*EU-wide networks and European education and training NGOs*” as well as “*the policy dialogue with relevant stakeholders in the field of education and training*”. EUCIS-LLL would like to make some proposals that will support policy developments in education, training and youth in the most cost efficient and sustainable way.

EUCIS-LLL proposes **three sub-actions** that would support:

- Support for policy dialogue with relevant European stakeholders in education & training
- Support to European education and training NGOs
- Support for national cooperation in education & training on the EU policy agenda



How to support policy reform in lifelong learning strategies and policies?

In order to create the appropriate conditions for **efficient, legitimate and sustainable policy reforms** at EU and national level, it is indispensable that Erasmus+ Key Action 3 sustains the legacy of the Lifelong Learning Programme and keep on providing operational funding opportunities for European NGOs and platforms.

We would like to emphasise the need to sustain and better structure a policy dialogue with relevant stakeholders and civil society in particular (especially through the first action supporting representative Platforms) in the framework of a European cooperation in education and training. Indeed, **no structural change in the field can be genuinely designed, implemented and assessed without their collaboration**: first because they have the practical expertise and experience that policy-makers do not have; second because all actors must feel ownership for the reforms in order to implement them qualitatively. *“Effective partnerships and cooperation require strong and sustainable coordination structures and a shared vision among stakeholders”*¹. A civil society platform on lifelong learning could play this role of bridging the gaps across sectors and levels of education and training but also to involve and create awareness about the EU cooperation framework in education and training. The action will also **provide other channels to the European Commission** to collect data on current situations in Member States and formulate policy recommendations.

Action 3.1 answers the Deputy Director-General’s request to elaborate a **“roadmap for more structured and coherent consultation mechanisms”** in the future by proposing concrete tools to implement a sustainable dialogue in education, training and youth. This need has been recognised in many EU reports and communications² as crucial to reach European objectives.

¹ Commission staff working document [“Partnership and flexible pathways for lifelong skills development”](#) accompanying the Communication from the Commission Rethinking Education.

² Many references can be found on the need to establish a regular dialogue with civil society organisations and stakeholders:

- A *“partnership approach should extend to EU committees, to national parliaments and national, local and regional authorities, to social partners and to stakeholders and civil society so that everyone is involved in delivering on the vision”* for a smart, sustainable and inclusive growth – Communication from the Commission *“Europe 2020: A strategy for smart, sustainable and inclusive growth”*?, 3 March 2010, COM(2010) 2020 final.

- *“In the area of lifelong learning, partnership is needed because lifelong learning is a shared responsibility and no actor can achieve a coherent and comprehensive lifelong learning policy alone.”*, High Level Group on *“Critical factors for the implementation of lifelong learning strategies and policies”*, 2010

- A *“strategic framework for cooperation in education and training involving all stakeholders”* at the EU level – New Skills for New Jobs flagship initiative, Communication from the Commission *“Europe 2020: A strategy for smart, sustainable and inclusive growth”*?, 3 March 2010, COM(2010) 2020 final.

- *“Broader learning communities, involving representatives of civil society and other stakeholders should be promoted”* – Council conclusions of 12 May 2009 on a strategic framework for European cooperation in education and training.

- *“Support for policy reform action shall include the activities initiated at Union level related to (...) the policy dialogue with relevant European stakeholders in the area of education, training and youth”*, Regulation *“Erasmus for All”*, November 2011.

3.1 Support for policy dialogue with relevant European stakeholders in the field of education and training

a) A European civil society platform on lifelong learning

The purpose of this action is to further support the implementation of the **structured policy dialogue** with European stakeholders with a view to contribute to their effective involvement and cooperation, in particular in the field of lifelong learning, which includes all sectors and levels of education (early, education, schools, VET, adult education and higher education, as well as formal, non-formal and informal education). A platform representing those various actors should be supported in order to sustain the work that EUCIS-LLL has been achieving so far, structuring a unique communication channel between the main European organisations in education and training and between them and the EU institutions on **transversal issues**. Indeed the Europe 2020 Strategy recommends a **partnership approach** extending to relevant stakeholders. Their cooperation is also encouraged in the Education and Training 2020 Strategic Framework as highly valuable in terms of policy development, implementation and evaluation of European lifelong learning strategies and policies. The action will support the implementation and continuous improvement of structured channels for a better civil dialogue via a lifelong learning platform of stakeholders.

Specific objectives

The support to the lifelong learning platform will contribute to:

- Inform and increase awareness of lifelong learning and of the outcomes of European cooperation among citizens, civil society organisations as well as bodies at European, national and local levels;
- Multiply EU action and raise awareness in particular of the European Semester, the Europe 2020 Strategy, the Education and Training 2020 Strategic Framework and the Open Method of Coordination; promote the implementation of lifelong learning strategies at EU, national and local levels;
- Facilitate exchanges and debates between actors from the different sectors and levels of lifelong learning; support peer learning, capacity-building and exchange of innovative ideas; dissemination of best practices across sectors and levels of education and training;
- Keep facilitating the dialogue and the cooperation between European stakeholders, the EU institutions and the Member States in the implementation and evaluation of lifelong learning policies and of the achievements of the objectives and priorities set out in the "Strategic framework for European cooperation in education and training (ET 2020)".
- Foster regular consultation mechanisms so that EU citizens can feed their expertise and experience in EU decision-making and voice their concerns via its member organisations; support the DG Education and Culture in setting up consultation mechanisms such as the European Education, Training and Youth Forum.

Who can apply?

One organisation, an umbrella Platform embodying lifelong learning, can apply. It shall gather a minimum number of civil society European organisations from all levels and sectors

of education and training (**formal, non-formal and informal**) and have a broad geographic coverage.

The platform shall contribute to bridge learning pathways and increase flexibility of education and training systems and thus contribute to the realisation of a genuine **European area for lifelong learning**. It shall be a stable coordination structure which benefits from the trust of its peers.

Operational support to:

- Thematic working groups (peer learning activities, policy recommendations, exchange of good practices) to promote cooperation between sectors and levels of education and training;
- Conference, seminars, policy debates to address specific priority areas of the Education and Training work programme;
- Exchange of good practices across sectors and levels of education and training and their dissemination on current or emerging challenges in education and training;
- Training activities in order to support civil society organisations in dealing with European tools, frameworks, policies and programmes;
- Organise events to raise awareness on lifelong learning (i.e. Lifelong Learning Weeks);
- Stakeholders' consultation prior to the European Education, Training and Youth Forum
- Dissemination of information on the European agenda and lifelong learning;
- Other relevant actions.

Duration

To concretise a EU civil dialogue in the field of lifelong learning, the Platform should submit a three- or four- year proposal describing in details what activities will be undertaken (pluriannual action plan). The Platform will have to organise a minimum of activities each year, related to ET2020 priorities or the EU policy agenda in lifelong learning. The work plan should start on 1st January in order to match the accounting system of the organisation.

Budget

The annual budget should be up to 500 000 EUR/year.

b) Accompanying measures (not part of the users' guide)

In the spirit of the Europe 2020's partnership approach, a sustainable dialogue has to be reinforced in the field of education and training to improve the implementation of the ET2020 work programme, as the new legal basis seems to points out: *"Support for policy reform action shall include the activities initiated at Union level related to (...) the policy dialogue with relevant European stakeholders in the area of education, training and youth"*. The open, transparent and regular dialogue evoked by the article 11 of the Lisbon Treaty is the only way to achieve successfully the EU strategic objectives in lifelong learning; and this will not be possible without clear mechanisms of communication, consultation and cooperation. Accompanying measures could support the implementation of these mechanisms. These could be part of the annual work programme on grants of the DG EAC. Related costs for civil society organisations (logistics, staff) would be included in the action 3.1.

Specific objectives

- Provide a framework for the regular exchange of views and best practices, input into the policy-making process, follow-up and evaluation.
- Ensure that relevant institutions and actors are involved and, through a participatory and meaningfully structured dialogue, lead to common goals.
- Enrich decision-making and implementation processes in Europe by taking into account the views of the implementers.
- Promote the participation of educational actors and their associations at European, national and local level in the consultation process that concerns them.
- Develop synergies between actors and the European institutions to raise awareness on lifelong learning.
- Create ownership on the Strategic framework for European cooperation in education and training “ET2020”.

Type of actions

In order to ensure a transversal dialogue with stakeholders including civil society, social partners and policy makers, it is essential to set up coordination structures at EU level. The DG Education and Culture, with the support of EUCIS-LLL, could organise the following actions:

- Structured dialogue meetings: twice a year, meetings aimed to discuss policies with the different Units and Directorates of the Commission and with the EU Presidency aimed to ensure the coherence of the Lifelong Learning agenda. These meetings would allow the different units/directorates to present their priorities and actions to stakeholders who could give their opinion; share their good/bad practices; raise awareness on emerging priorities from the sectors. These meetings would aim to identify incoherencies or possible synergies between different EU policies and actions. EUCIS-LLL has the know-how and the capacity to gather the various stakeholders’ in education and training and could facilitate the organisation of such meetings together with DG EAC.
- Education, Training and Youth Forum: this Forum aims to discuss progress in modernising education and training systems drawing on the discussion of education issues in the European Semester. It gathers various stakeholders – social partners, civil society representatives and decision makers from different levels.
- KA3 coordination meetings: the three actions proposed by EUCIS-LLL under Key Action 3 could be seen as part of the same cycle. The programme should support the setting up of an informal group gathering the project coordinators of these actions in order to ensure a European coordination to avoid duplication and to mutually enrich each other. This group would meet on a yearly basis and share main policy outcomes from their initiatives.
- Participation of stakeholders in the Erasmus+ Programme Committee: civil society should be better associated to the development and implementation of Erasmus+. As its main users, they can bring valuable input from the grassroots level. The compromise reached on Erasmus+ says that the Programme Committee will meet in specific configurations according to the field discussed and that experts will be invited on an ad hoc basis. This could be easily organised, by, for example, formally inviting the representative organisations/platforms to the relevant programme committee configurations to express their views regarding the implementation and yearly priorities.
- Other relevant actions.

3.2 Support to European education and training NGOs

The 2012 Joint Report on ET2020 states that it should become the mechanism to mobilise stakeholders, increase their ownership and harness their expertise. In order to sustain the work achieved during the Lifelong Learning Programme by European organisations (Jean-Monnet key activity 3) but **make sure their impact and EU added value is scaled-up**, the objective of this action is to support membership-based organisations at EU level (non-public, non-profit) **in a certain area of interest in the field of education and training**, in line with the Education and Training 2020 Strategic Framework priorities. The action is very much complementary to Action 3.1 as those **European organisations** can inform their grassroots members on EU action and voice their expertise and needs on a precise field of lifelong learning. This action shall lead to a better EU democratic process via more informed and engaged citizens. It will also improve decision-making since it will provide a better picture of the concerned area, what are the common stakes and challenges to tackle and how to do it in a collaborative way at EU level.

Specific objectives

- Multiply EU action; raise awareness of what concerns the given field of interest in the main EU strategies and policies (mainly the European Semester, Europe 2020 Strategy and Education and Training 2020); promote European action in a certain field and its added value.
- Capacity-building of national organisations on the EU agenda.
- Support sectorial thematic policy dialogues, i.e. on the renewed European Agenda for Adult Learning or the modernisation of higher education systems.
- Support trans-sectorial thematic discussions (i.e. on early school leaving or intercultural dialogue).
- Encourage peer learning by providing a forum for dialogue, exchange and dissemination of good practices in the field of interest.
- Be an incubator for comparative analysis and innovation to bring a contribution to key EU outputs (i.e. the Education and Training Monitor) and improve key EU processes (i.e. the Open Method of Coordination).
- Contribute to support key directions for reforms at EU level such as the modernisation of education and training systems, the shift to a learning outcomes/learner-centred approach and to more flexible learning pathways including a subject-based approach.
- Use the expertise of its members to formulate recommendations for the elaboration, implementation and monitoring of EU legislative work within the given field of interest.

Who can apply?

Individual organisations or associations gathering members in a minimum number of EU countries are eligible to this action. It is not necessary to build new consortia for this action (setting up new networks should be a completely different action) as European organisations have already the capacity to gather relevant stakeholders and the expertise to achieve the objectives. Those **organisations can represent a specific sector or a thematic area**, as many are trans-sectorial. It is essential that a minimum number of organisations be subsidised in order to cover various voices and policy areas in lifelong learning.

Operational support to:

- Sectorial or thematic working groups;
- Peer learning activities;
- Conference, seminars, policy debates, campaigns;
- Exchange of good practices and their dissemination;
- Membership activities (communication, consultation);
- Training activities;
- Research and comparative analysis in the field of interest; evidence delivering supporting policy development;
- Capacity building, training activities;
- Other relevant actions.

Duration

To concretise a better European cooperation in a certain field of education and training, the European organisation should submit **a one-year or a three-year proposal** describing in details what the strategy and activities that will be undertaken (action plan). The European organisation will have to organise a set of activities each year related to ET2020 priorities or the EU policy agenda specifically linked to the field of interest.

Budget

The annual budget should be up to 250 000 EUR/year.

3.3 Support for national cooperation in education and training on the EU policy agenda

This action supports **national cooperation structures between stakeholders** (such as civil society organisations or educational institutions), exclusively aimed at raising awareness of and gaining ownership on EU lifelong learning strategies and policies. It is especially important that citizens within Member States become aware of the debates taking place at EU level and that will influence their daily life. Regular discussions on the EU agenda at national level are so far almost inexistent. This action is therefore very much complementary to the other two Actions because a genuine structured dialogue with stakeholders cannot be achieved without supporting actions at national level. The goal of the action is to **foster a shared meaning of lifelong learning, create a community of understanding** and European values and encourage mutual recognition of peers, better commitment and collaboration. Besides, the action is also aimed to give a **more holistic picture** on the national implementation of EU lifelong learning strategies and **enable better data and opinion collection** at EU level by breaking down barriers between sectors and actors in the same country. The difficulty to do so has been identified as a major critical factor to implement EU lifelong learning policies and strategies at national level.

Specific objectives

- Multiply EU action at local, regional and national level and promote its added-value; support awareness-raising activities on EU action for a wide audience and the way it is implemented at national level;
- Favour a space for dialogue between different types of stakeholders from various education and training sectors (i.e. national stakeholders' forums) on transversal challenges to enable peer learning;
- Gather representative experts and national authorities in key moments of reflection fed with data and good practices from other Member States to allow comparative territorial analysis;
- Empower grassroots stakeholders and encourage them to engage into EU civil dialogue;
- Contribute to improve national education, training and lifelong learning strategies in light of EU directions for key directions for reforms at EU level; with a particular emphasis on bridging formal, non-formal and informal learning;
- Monitor the national implementation of European Semester guidelines in the field, provide the European Commission with key data and stakeholders' perceptions on the field.

Who can apply?

A consortium of organisations can apply to this action. It shall include a broad partnership with civil society, policy-makers and social partners.

What type of actions?

- National Stakeholders Forums;
- Expert meetings in collaboration with national authorities;
- Awareness-raising activities;

- State of art of Country-Specific Recommendations implementation;
- Information and training activities on EU funding opportunities (Erasmus +, European Social Fund
- Compilations of good practices;
- Other relevant actions.

Duration

To concretise national cooperation for the implementation of more comprehensive and coherent EU lifelong learning strategies, the consortium must submit **project proposals on a 1-3 year basis** describing in details what activities will be undertaken. The consortium will have to organise a minimum activities each year, related to ET2020 priorities or the EU policy agenda in the field of lifelong learning.

How could financial rules be simplified for European platforms and NGOs?

This section is aimed to provide some recommendations on financial simplification for our proposed Action 3.1a (a European civil society platform on lifelong learning) and Action 3.2 (support to European education and training NGOs)

A timely payment for 2014: European platforms and NGOs should not suffer from delays in Erasmus+ negotiations

As the official Erasmus+ programme will not be adopted before autumn 2013, the publication of the 2014 calls for proposals has been postponed to the end of 2014 and EUCIS-LLL, some of its members networks and other European civil society organisations will highly suffer from those delays, as no EU fund will be provided in the first months of next year. Many of us will have to fire their staff members. For the sake of our organisations' staff and good functioning, it is imperative that the Commission and the Executive Agency accelerate the procedure for those calls in particular and make **timely payments in 2014**. In the future, calls should be launched at the latest in June with a deadline in September, a decision in November, the signature of agreements in December and advanced payment in January. Furthermore, the exemption from the **degressivity principle** that applied for European organisations in education and training under the LLP should be sustained under Erasmus+ so that those organisations' sustainability is not under threat. However we agree that they should seek other support than EU funds to sustain themselves; for this reason, the **no-profit rule** should be suppressed for those organisations so that they can generate some benefits (they can already build up reserves, which is a good way forward). The 2012 Financial Regulation acknowledges that the no-profit principle should be re-examined and more flexibility should be introduced.

The choice between budget-based financing and flat-rate grants

Experience from the LLP has shown that both funding schemes were satisfactory for beneficiaries. Indeed, **budget-based financing** seem to correspond much more to the reality of the beneficiaries' accounting and be clearer for them and the Executive Agency on which activities are eligible or not; this also allows beneficiaries to better adjust the activities they want to concretise according to their co-funding capacity, which is more financially securing for both grant agreement parties. This financing is also less constraining than flat rate grants as the amount allocated is less linked to staff pay scales. Besides, in a flat rate system, those national scales are moreover often calculated in an arbitrary way and lead to more risks of double funding if they do not correspond to the reality of the organisation. However, **flat-rate grants/lump-sums** are often privileged by beneficiaries because it considerably reduces the administrative burden and therefore workload of both parties, which also makes EU grants more accessible to smaller organisations. Indeed, beneficiaries appreciate that the Executive Agency trusts them on the way they spend the money (more qualitative evaluation) and would even foresee in the future programme the generalisation of this system, which benefits are already acknowledged by the 2012 Financial Regulation. Besides, this freedom has many advantages: for instance there is no need for the organisation to worry about the margin for reallocation of money between different budget headings or about the eligibility to indirect costs.

Make contributions in kind as part of co-funding the rule and not the exception

Volunteer work is the **specific added-value** of civil society organisations' activities. The 2012 Financial Regulation allows recognising in-kinds contribution, recorded as ineligible costs, as co-funding. It clearly sets the possibility to support 100% of the eligible costs without infringing the co-funding principle, bringing contributions in kind as part of the co-funding. This solution should be made possible for European organisations and platforms in Erasmus+. This functioning has already been tested for EUCIS-LLL and was approved by the European Commission and by an external auditor as valid.

How could management rules be simplified for European platforms and NGOs?

This section is aimed to provide some recommendations on management simplification for our proposed Action 3.1a (a European civil society platform on lifelong learning) and Action 3.2 (support to European education and training NGOs)

Yes to more consistency with EU priorities, no to more complicated application forms

In order to ensure the EU added value of the EU funded platforms and NGOs mentioned above, the Commission has expressed the will to assess in an even stricter way the **consistency of applications with EU priorities**. We agree with this decision but it should not entail more complicated application forms with duplicated information (redundancies objectives, rationale, impact...). **Applications procedures should be made as user-friendly as possible**, based on "who, what, why, when, for whom and how". Information should be well organised and clear in order to provide enough material for the experts to evaluate applications in a realistic way, given the time they have to assess them. On technical aspects, the **use of eforms** should be more systematic. DG EAC should **liaise with the Executive Agency** on this issue if European platforms and NGOs have to apply to the EACEA to obtain their EU support.

Simplified grant management

EUCIS-LLL and its member organisations have experienced difficulties in their grant management over the past years. We believe that it is possible to find a good balance between the need to ensure that public money is well spent and the need to ensure that beneficiaries can multiply EU action without suffering heavy administrative burden. **Amendment requests** should be prevented as much as possible by making contracts less specific and, when it is necessary to amend, procedures should be easy but well-argued and aim towards improved outcomes. In this line, more flexibility should be given in order to reallocate parts of the budget ("**10% rule**"). Indeed, it is nearly impossible to plan the exact costs one to four years in advance. The possibility to adapt the budget according to real costs should be easier. For instance a reallocation of 20% of the appropriations for the year would lead to more tolerance in the new programme Besides, **auditing requirements** also represent a huge burden on the time and resources of civil society organisations and for the European Commission. The amount of paperwork that is to be kept by applicants during many years is huge. Changing **evaluation rules** by focusing on evidence (results) and developing **the use of lump sums** or flat rates would be more cost effective and of greater value (see below). **Eligibility periods** also lack of cost-effectiveness. This rule is mentioned as being rigid and ineffective. The eligibility period should be based on the activities and not on

the day of purchase. If platforms and NGOs plan a meeting at the beginning of the eligibility period, they should be able to buy their plane tickets before this period.

Duration

Experience from the Lifelong Learning Programme has shown that granting **EU funds for three years** was much more sustainable for European platforms and organisations than a yearly-basis, and therefore more impactful. Presenting a 3-year proposal and making regular reporting to the Executive Agency is indeed a lot simpler than submitting a work plan and administrative formalities every year. It is also much more securing for the Agency and for the applicant as both know in which direction the applicant is going: a three-year grant is much more appropriate to fulfil long-term objectives that will have a genuine impact and durably reach the target groups. A tri-annual grant also allows a more financial security: for instance with longer staff contracts and less turn-over (more staff loyalty and competence, less precariousness), more opportunities to win the confidence of other partners such as sponsors, better ways to manage financial constraints (i.e. bank guarantee, co-funding), accounting and cash flows (as payments often come very late in the year). Yet, for European NGOs that feel more comfortable with a one-year grant (for instance young organisations), this option should still be available.

The **calls should be available every year** in order to give the opportunity to apply or re-apply to as many platforms/organisations as possible, even if the grants are limited.

Suppression of the pre-financing guarantees

The request for a pre-financing guarantee is very problematic for many organisations. For example, Belgian banking agencies reject the model required by the Executive Agency particularly because of the referral, in case of dispute, to the European legal authorities only, which excludes the legal authorities of the Belgian law. This is an important barrier that should be overcome. Furthermore, this creates inequalities across the countries as some applicants are asked to provide a bank guarantee by their national agencies while others don't. A solution could be for the European Investment Bank to provide such guarantees or simply to suppress them. The European Commission should propose alternative solutions to the bank guarantee, on a case-to-case basis, for example by lowering the pre-financing or giving several instalments as suggested in the Financial Regulation (art. 134).