



**Plate forme européenne de la société civile pour l'éducation tout au long de la vie
European Civil Society Platform on Lifelong Learning - EUCIS-LLL**

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EUCIS-LLL POSITION ON THE FUTURE PROGRAMMES FOR EDUCATION, TRAINING AND YOUTH

The European Civil Society Platform on Lifelong Learning (EUCIS-LLL) gathers 20 European networks in education and training. Together, they represent thousands of teachers, animators, school heads, HR professionals or trainers, in training centres, schools, associations or universities. All these networks and most of their members are strongly committed to building European projects in the field of education, training and youth. They are using EU programmes such as the Lifelong Learning Programme or Youth in Action but also the European Social Fund to this end. As beneficiaries of the programmes, they would like to express their views on the future of the programmes, which is crucial as it is based on concrete experiences of working with the programmes. Most of them participated in the online public consultation as well as in the Stakeholders' Forum on the future programmes that took place on 28-29 October 2010. They nevertheless feel the need to send some key messages to the EU institutions in the final stages of decision-making.

On 19 October 2010, the Commission adopted a Communication¹ that represents a basis for discussion in the run-up to the proposals for the financial framework post 2013. The Commission is looking forward to ways to spend more intelligently on the basis of 5 principles: a focus on policy priorities; on added value; on results; on solidarity in delivering mutual benefits; a reform of the financing of the budget. It shall come with a legislative proposal by 1 July 2011. We would like to contribute to that reflection on the basis of our experience of the programmes, mainly Lifelong Learning and Youth in Action. Of course, some of our recommendations apply to other programmes too.

Although three separate impact assessments (Erasmus Mundus, Youth in Action, Lifelong Learning Programme) have been launched to support the proposal for a next generation of programmes, a coordinated approach is taken by the Commission to ensure that they contribute together to Europe 2020 and Youth on the Move in the most relevant, effective and efficient way. The Commission defined the following operational objectives:

- ⇒ Create systems through which it will be possible to reach a critical mass of target groups;
- ⇒ Ensure the recognition of reached qualifications and/or of the learning experience abroad and make the EU education systems more attractive;
- ⇒ Identify and ensure possibilities of the further (co)funding from other EU resources as well as from the private, national, regional levels;
- ⇒ Simplify the management and administrative processes of the programme;
- ⇒ Mainstream / simplify the structure of the programme.

EUCIS-LLL would like to contribute to each of these issues.

¹ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee, the Committee of the Regions and the national parliaments, The EU Budget Review, Brussels, 19.10.2010 COM(2010) 700 final.

1/ Create systems through which it will be possible to reach a critical mass of target groups

Many studies have shown the positive impact of mobility programmes on individual's personal and professional developments. Today, programmes remain generally limited to the most privileged, although they should aim at giving everyone the chance to experience "Europe". This means sufficient financial support as well as targeted information and support.

EU programmes for lifelong learning and youth have to be up to the challenges set in Europe 2020

- ⇒ define a EU budget according to the general interest. In 2008, a Eurobarometer (n°70/Autumn 2008) showed that 30% of Europeans wished that the European budget be spent on education and training. In times of crisis, it is even more important to invest in our future;
- ⇒ more investment and an extension of the current programmes notably the Lifelong Learning programme to reach the Europe 2020 targets. Today, it represents around 0,8% of the total EU budget. This greatly limits its impact. It should represent at least 2%.

Improving access to EU funding is a key

- ⇒ national agencies should propose sufficient training sessions to "unblock" potential applicants notably in speaking other languages with their partners. Beneficiaries would also benefit a lot from training in media, legal issues and financial administration, as their expertise is often not in these fields. An increased budget line should be made available and the EC should make sure that access is equal in all participating countries;
- ⇒ provide guidance services at national or regional levels. Today grants for technical assistance are linked to specific programmes. A specific budget line could support "cross-programme information points" to help applicants in their first steps and to direct them to the competent national or EU agency;
- ⇒ use existing networks in order to reach a larger audience (popular education movements, networks of teachers, associations, etc.) and allow national agencies to give presentations during events/training sessions to ensure a multiplying effect and organise contact seminars with them;
- ⇒ raise awareness on the programmes to a wider audience focused on those currently excluded or difficult to reach: using ambassadors, community leaders, new IT tools (social networks) where learners are;
- ⇒ develop a unique platform of information on the different programmes in all languages in accordance with the multilingualism strategy at EU level. It shall be coherent, consistent and user-friendly.

2/ Ensure the recognition of reached qualifications and/or of the learning experience abroad and make the EU education systems more attractive

EU programmes aim to put political priorities into practice. According to us, making lifelong learning a reality is a key priority. It shall be made possible by implementing common European tools (qualification frameworks, validation tools, credits systems, mobility and recognition schemes, quality standards) in a coherent way at national and regional levels and by reforming education and training systems to ensure permeability and equity. In order to reach the political targets of Europe 2020 it is crucial to adopt a holistic vision and to recognise the different ways of accessing knowledge, skills and competences.

*"Learning Mobility has a strong impact on transforming society, while sustaining peace and promoting tolerance, making people more mobile in general and supporting their personal and professional development which also yields academic and economic benefits at various levels."*²

² Key messages, Stakeholders' Forum, 28-29 October 2010

Basic principles and key priorities

The future programmes should:

- ⇒ be fully inclusive, including different ways of learning in a learner-centred environment (recognition of informal, non-formal as well as formal learning across all sectors of society) and promoting a competency-based process within different learning settings;
- ⇒ aim to promote opportunities for people to acquire transversal competences for life such as creativity and entrepreneurship and active citizenship (in a global setting);
- ⇒ not just focus on professional or skills development but also on personal development (not just addressing economic needs but building a new society of active citizens in all walks of life);
- ⇒ the systems of validation of non-formal and informal learning have to develop more quickly;
- ⇒ to address social inclusion it is important to look at pedagogy (learning processes and environments);
- ⇒ ensure dignity for those undergoing mobility and an equal approach allowing mobility also for those coming from a poor family background and from less advantaged countries/regions;
- ⇒ the importance of language teaching and intercultural education should be further raised.

Contribution to EU 2020 and ET 2020 strategies

- ⇒ focus on policy implementation of best practices in the Member States;
- ⇒ involvement of stakeholders at national and regional levels;
- ⇒ a European Institute on Lifelong Learning could improve cooperation between various stakeholders;
- ⇒ more efficient dissemination and use of good projects' results at EU and national level;
- ⇒ identify common trends and standards at EU level but allow enough flexibility to adapt to society's needs and to enable the emergence of innovative ideas, concepts and processes;
- ⇒ improve linkages between projects across the programmes to ensure a better impact and dissemination;
- ⇒ bureaucracy and application processes should be simplified and common to all programmes ("universal basis of rules") to allow synergies.

3/ Identify and ensure possibilities of the further (co)funding from other EU resources as well as from the private, national, regional levels

It would be easier for organisations to offer their learners an opportunity to go abroad if public authorities were strongly concerned by this issue and could participate in its funding. National Agencies and the European Commission should encourage local and national authorities to invest more into European projects.

- ⇒ their staff should be trained on EU programmes and policies;
- ⇒ they could introduce specific training modules on European affairs for educational or youth actors they are competent for (teacher initial and continuing training, social workers, etc.);
- ⇒ they could cooperate with national agencies to offer guidance and support to applicants at local and regional levels;
- ⇒ national authorities and private companies should value learning mobility for their staff and encourage it (i.e. teachers or parents' leave to participate in European conference or seminars);

- ⇒ national authorities and private companies should help small organisations to find the necessary co-funding for their European projects;
- ⇒ it is important to recognise the specific situation of European organisations that are Europe-based as they have more difficulties finding support at national level. Specific rules should apply to them.

4/ Simplify the management and administrative processes of the programme

Non-profit making organisations need to raise funds in order to function. If the Commission represents an important contributor, the implementation of the current financial regulation often prevents them from participating in EU programmes. Potential candidates are frequently discouraged by the application procedures as well as by the administrative burdens that come with managing EU projects. It is generally agreed that preparing a transnational project takes around 6 months - with no guarantee that it will be selected at the end. Of course, it is very important to have a strict and transparent selection process but not all the organisations can afford this. Applications should be simplified.

Simplify application procedures

- ⇒ write more coherent and understandable application forms: “who, what, why, when, for whom and how”;
- ⇒ apply a 2-step procedure especially for very competitive grants: sending a first proposal and, if accepted, submit the whole application;
- ⇒ information in the application form should not be duplicated (i.e. role of partners in general and for each work package & hours in the budget and the application);
- ⇒ information about the organization that has to be sent repetitively can be stored centrally (like or together with PADOR but simpler);
- ⇒ more flexible and longer deadlines to ensure greater participation;
- ⇒ national agencies should apply the same rules (priorities, deadlines, procedures).

Simplify the activity and financial management of projects

- ⇒ the need for amendment 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;
- ⇒ receiving the first instalment 3 or 4 months after the start of the project has a very negative impact on the projects and on quality delivery;
- ⇒ more flexibility in the instalments procedure is necessary if we want smaller organisations to take part. In specific cases the EU could give most of the grant (80%) at the beginning of the project as it is the case for Grundtvig “Learning Partnerships”;
- ⇒ indirect costs represent more than 7% of the total budget which limits the possibilities for some organisations to participate. The ratio for indirect costs should be at least between 10% and 20%;
- ⇒ applicants should be able to ask for indirect costs when they apply to call for proposals even if they receive an operational grant. Indeed, every new project generates such expenditures;
- ⇒ more flexibility on the percentage ratio of co-funding between non-profit making organisations and profit-making organisations, between small and average-sized organisations and those already receiving important funding at national or regional levels. This is particularly true for European organisations and networks that do not get support at national or regional levels;

- ⇒ recognise volunteer work as contributions in kind. The current regulation mentions that the Authorising Officer can allow the recognition of volunteers' work but in practice it is seldom the case. The Commission could propose indicative daily allowances or ask the applicants to justify an equivalence based on employees that perform similar tasks in their organisation;
- ⇒ the pre-financing guarantees required by EACEA is very problematic for some organisations. For example, Belgian banking agencies reject the model required by the 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;
- ⇒ lump sum systems tend to be easier, they enable smaller organisations to take part in EU projects. Some programmes, like Grundtvig "Learning Partnerships" or "Workshops", are given as good examples. Evaluation is mainly qualitative - and not on how each Euro is spent;
- ⇒ 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.
- ⇒ other financial rules are mentioned as being very rigid and ineffective. For example, the eligibility period should be based on the activities and not on the day of purchase. If partners plan a meeting at the beginning of the project (within the eligibility period) they should be able to buy their plane tickets before the project officially starts;
- ⇒ the non-profit rule is unsustainable. Organisations that use the EU operating grants to cover their core costs, while they are running other projects that generate some surplus, have to give all this built-up surplus back to the EU even if the activities of the project are not related to the activities carried out for the operational grant. This rule does not support the development of a sustainable civil society and should be re-examined. A built-in tolerance of 20% would help;
- ⇒ Other difficulties have been mentioned such as exchange rates and the existence of different accountability systems which can complicate the financial reporting.

Management and evaluation

In order to improve the management of EU programmes, the European Commission set up executive agencies such as the Executive Agency for Education, Audiovisual and Culture. The Agency is responsible for most management aspects of the programmes, including evaluating applications but also for informing and supporting applicants and beneficiaries. We welcome the efforts made to improve transparency and management we would nevertheless like to point out some areas where improvements could be sought:

- ⇒ the link between policy and its implementation through the Executive Agency should be evaluated;
- ⇒ the selection process should be reviewed. It is now distant and dialogue is lacking;
- ⇒ more transparency is requested on the way applications are evaluated and quality feedback should be given;
- ⇒ decision-making should be faster and more transparent. For instance, once the decision is officially taken to support a project, the first instalment should arrive as rapidly as possible;
- ⇒ the Commission and Agency should focus its interim or final projects' evaluation on evidence (results);
- ⇒ networks that benefit from operational grants outline that the EACEA should consider them as civil society networks and not as regular projects.
- ⇒ a solution to improve the system could be to implement co-management in the governance of programmes but further reflection is needed on its modalities.

5/ Mainstream / simplify the structure of the programmes

Most actors in education, training and youth are happy with the current programmes. They nevertheless outline some improvements that could ensure a better match between policy objectives and programmes. Evolution but no revolution! We need to rationalise the application process and have a sound management at EU and Member State levels as outlined in the previous section. Simplification of the current structure and a better allocation of resources can also contribute to better reaching the objectives.

General structure

- ⇒ programmes start to be known, changing their names again would have negative effects;
- ⇒ the different programmes should not be merged but more flexibility and opportunities should allow linkages between the different sub-actions and programmes in terms of mixed target groups, actions or targets;
- ⇒ transectoral actions could be planned to give more coherence between the policy level that supports lifelong learning strategies and the programme level which mainly supports sectoral projects;
- ⇒ European not-for-profit organisations play a crucial role in informing and involving education and training actors in EU cooperation and should thus be adequately supported by the Commission. The budget allocated to European organisations should be increased;
- ⇒ allow the participation of non-EU partners in our projects!

Structure of the Lifelong Learning Programme

- ⇒ partnerships should be expanded in the future Lifelong Learning Programme for their added value and considered as a basis for mobility actions;
- ⇒ cooperation projects are important for their contribution to policy development (EU2020) and should be maintained in the future LLP;
- ⇒ European networks (operating grants) should be stronger in the future programme. The support should be done in a sustainable way in order to acknowledge these networks who play a key role as multipliers and strongly contribute to reach the objective set;
- ⇒ mobility for all should be encouraged by providing a status to beneficiaries and by supporting them before/during/after the mobility period (sending and hosting organisations) and by allowing hosting organizations (and individuals when applicable) as well as sending organisations to apply for grants;
- ⇒ a new budget line should enable the sustainability of good projects (EU level) with specific rules (i.e. no co-funding) and with strong quality assessment;
- ⇒ visible and qualitative information about good projects (database, platform) and easy and targeted research should be made possible.

