

PREAMBLE

We, the major European Stakeholders in Education, Training and Youth, believe that the necessary transformation of national education and training systems and development of educational networks can only be achieved by European cooperation which is a prerequisite of realising a knowledge based society. EU programmes should aim to support organisations and individual learners in building the Europe-wide learning space step by step. This Area should aim at making lifelong learning a reality for all its citizens.

The current programmes are crucial for millions of learners and educators in Europe. They benefit from a wide recognition but their impact remains limited due to scarce resources. With the adoption of the “EU2020 strategy”, education and training is at the heart of the European project. Community programmes represent a real added value in reaching these objectives. The next generation should thus have the means to contribute to these objectives notably in terms of equal access to lifelong learning (accessing the formal system but also developing access to non-formal and informal learning). To reach “EU2020” targets it is crucial that the EU and its Member states consider investing in people as a top priority in the next financial perspectives.

We welcomed the broad consultation launched by the European Commission in preparation of the future of the Lifelong Learning Programme, Erasmus Mundus and Youth in Action in 2010. This vision paper is a logical next step in this process as through our networks several hundred million learners and educators engage with the EU to develop the next generation of EU programmes.

VISION ON THE FUTURE OF THE EDUCATION, TRAINING AND YOUTH PROGRAMMES

The programmes should be ambitious with clear aims and focus on those areas where they can make a difference. They should not try to do everything and to address all European challenges. We believe that their main aim is to support the construction of a European Education Area as a crucial step to reaching the objectives of “EU2020”. It needs to be done by adopting a holistic vision of education and training that puts at a same level of esteem various ways of accessing learning be it formal, non-formal or informal. They would provide opportunities for people to acquire transversal competences for life such as creativity, intercultural dialogue, active citizenship or entrepreneurship. They shall be inclusive and support a strong European civil society.

In order to have the most effective and European added-value programmes for inclusive society through smart, sustainable and inclusive growth, we recommend that the next generation of EU programmes be based on the following key principles:

1/ Promoting a Holistic Vision of Learning

The programmes should be based on a holistic vision of learning, providing means to develop competences throughout life. They should aim at bringing different providers from various sub-sectors¹ together to gain added-value not only from mobility but also from sharing practices and building policy options. Transforming the general attitude of European citizens to be open to development and learning is a high target that will require coordinated actions. Programmes should not only be about “new skills for new jobs” but also about new ways of participation in society. Indeed, acquiring and improving skills, knowledge and competences goes beyond the sole aim of improving employability and encompasses developing active citizenship and social cohesion.

2/ Ensuring an Equal Access for All

The programmes should be for all learners (from early childhood to seniors), regardless of their social or geographic background. This requires a specific financial support to enable socially excluded groups to participate and to ensure the dignity of those undergoing mobility (i.e. proper financial support and mentoring). Such access should also be made possible in third countries and especially in neighbouring states. Transnational experience should be seen as an effective way to connect possible future members and partners of the EU. The programmes should be open to their participation.

3/ A Learner-centred perspective

The programmes should support actions that are learner-centred: actions supporting individuals’ needs and involving them actively in the learning process. The goal is to prepare them to steer their own learning pathway and become lifelong learners. According to each specific target group or situation, different solutions may be implemented by different type of actors. To foster innovation, it is essential to enable enough flexibility and encourage partnerships. The programmes should thus support projects based on “real-life” to achieve common European goals. They should aim at an increased permeability between the various sub-sectors. The diversity of our education and training systems can thus become a great asset to foster innovation.

¹ Adult education, vocational education and training, non-formal education / popular education, higher education, etc.

4/ A participative approach

Learners and educators from the various fields of education and training should be involved to co-decide on issues and programmes targeting them. This means that project proposals should plan a methodology on how to involve learners in the process. This participative approach needs to be a pillar of all programmes for education, training and youth. Furthermore, at the programme level, this participative approach should be developed into a structured dialogue with education and training stakeholders (including civil society organisations), Member States and the EU Institutions.

STRUCTURE AND MANAGEMENT OF THE PROGRAMMES

We believe that the different programmes should not be merged but more flexibility and opportunities should allow linkages between the different sub-actions and programmes. The four key principles raised above thus find the following translation in terms of structure and management:

1/ Flexible programmes

Today the Lifelong Learning Programme is organised by sectors and it is not easy to link actions between these sub-programmes and with other programmes such as Youth in Action or Europe for Citizens. It is essential to support innovative projects that are transversal and include various actors. Allowing better flexibility can be achieved with new transversal actions and with common application forms, deadlines and priorities. This would be an asset in reaching the overall objective of making lifelong learning a reality for all in Europe and would put political goals into practice. EU programmes should set common political priorities but leave room for organisations to justify the most effective way to reach them (not limiting them to very specific types of actions or actors).

2/ Administrative simplification

If we want the programmes to target all EU citizens regardless of their social or geographic background, they should become user-friendly. Building an application today is very complicated and most of the time limited to “professionals of Europe” or to privileged individual learners. It is urgent that the EU takes into account the various proposals² made by civil society organisations to simplify the administrative and financial burdens linked to EU programmes.

3/ Access and information

Alongside the administrative and financial simplification, it is crucial to improve guidance and information. This can be done by using existing networks, by raising awareness on the programmes to a wider audience focused on those currently excluded (using ambassadors, community leaders or new IT tools) and by developing a unique platform of information on the different programmes in all languages. The role of national and European agencies should be also evaluated and strengthened. National agencies have a key role to play but it is crucial to have common EU priorities to have the most effective impact (national agencies should apply the same rules in terms of priorities, deadlines and procedures).

4/ Participative and sustainable programmes

EU programmes should aim at increasing the mobility of individual learners without forgetting that nearly always there is an organisation supporting them. It is thus important to support individual mobility but also partnerships and policy cooperation between institutions and organisations. For instance, a new budget line should enable the sustainability of good European projects/networks that have an important impact in Europe. European not-for-profit organisations also play a crucial role as multipliers in informing and involving education and training actors in EU cooperation and policy making and in disseminating EU cooperation outputs. The Commission should thus support them in an adequate way via more sustainable operating grants.

CONCLUSIONS

The current Lifelong Learning programme, Youth in Action and Erasmus Mundus programmes and their predecessors have supported learning mobility and the development of innovation in European education and training systems. The EU and its Member States should rightly be proud of this and continue in this pathway. We need a new generation of programmes that is more ambitious, that truly puts learning at the heart of EU2020 and the core of the European project. We therefore call for an investment of at least 2% of the EU budget in the three programmes.

² Stakeholders' Forum key messages, October 2010; « Better Return on Investment » group of NGOs on the financial regulation; Civil Society Contact Group position on the financial regulation; EUCIS-LLL, ESU, EJY position papers on the future programmes and all the other contributions sent during the public consultation. These statements will be summarized in a separate position paper.

ANNEXE – OUR RECOMMENDATIONS FOR THE NEXT FINANCIAL REGULATION

In order to reach the policy objectives set in “EU2020” it is important to make sure the programmes do reach their targeted publics. We believe that alongside the need to match political priorities and programmes it is important to remove obstacles to participation. Indeed, the implementation of the current financial regulation often prevents key actors from participating. Potential candidates are frequently discouraged by the application procedures as well as by the administrative burdens that come with managing EU projects. Of course, it is very important to have strict and transparent procedures but 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 the right actors can be involved. If not EU programmes will be only for experts and not for citizens. Our contribution aims towards the definition of financial rules that ensure an optimum return on investment. The Commission’s proposal introduces improvements but we believe that more can be achieved. On the basis of our day-to-day use of EU programmes, we would like to make some concrete proposals to policy-makers in the process of adopting the new financial regulation by 2012. This new set of rules will indeed impact our daily work with millions of learners and educators in Europe.

SIMPLIFYING APPLICATION PROCEDURES IN 4 STEPS

1/ Revising application forms

More coherent and understandable application forms based on: “who, what, why, when, for whom and how”. The idea is to avoid duplicating information (i.e. role of partners in general and for each work package and hours in the budget and the application). Information should be well organised and provide enough material for the experts to evaluate projects.

2/ Applying a 2-step procedure especially for very competitive grants

It is generally agreed that preparing a transnational project takes around 6 months with no guarantee that it will be selected at the end. It would be more effective to adopt a two-step procedure: sending a first proposal and, if accepted, submitting the whole application. This would encourage organisations to participate and would save time and energy for both the European Commission and applicants.

3/ Setting up a database of applicants

Information about applicants could be stored centrally (i.e. legal status) to avoid applicants sending the same documents again and authorising officers checking them again. It would also improve transparency. Systems such as PADOR already exist and could serve as a basis but this database should be as simple as possible to avoid additional bureaucracy.

4/ Applying common rules

The financial rules could state the principle for EU programmes (especially for those operating in the same field) to have more flexible deadlines to ensure greater participation. It should be clearly stated that national agencies should apply the same rules in terms of priorities, deadlines and procedures to ensure the European added value of these programmes.

SIMPLIFYING THE FINANCIAL MANAGEMENT OF PROJECTS IN 4 POINTS

1/ Suppressing bank guarantee

The pre-financing guarantee required by some agencies is very problematic for many 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. A solution could be for the EIB to provide such guarantees.

2/ Developing the use of lump sums

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.

3/ Cost effective eligibility periods

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 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.

4/ Double ceiling

Today grants are expressed both as a maximum amount and as a maximum percentage defined in the grant agreement as a proportion of eligible costs. The Commission proposal excludes the absolute amount but maintains the percentage whereas this is precisely the one causing problems. It would be more effective to define the grant only as a total amount. Indeed, it is almost impossible to foresee exactly the expenses to be incurred in 1 or 3 years. This creates an important risk for organisations while having no effect on quality delivery.

GUIDING PRINCIPLES FOR AUTHORISING OFFICERS

It is important to tackle the lack of consistency in the interpretation and application of the financial rules (FR) and implementing rules (IR) across services (DGS). Today, authorising offices usually avoid taking risks and take the most conservative approach at the expense of innovation. Moreover, this situation creates unfair discrepancy for applicants across services. The FR and IR should provide guidance including advice on modalities to be preferred in specific cases. Organisations that request such exceptions could be asked to justify why this is necessary instead of having to negotiate bilaterally with the authorising officer as it is the case today. This would improve equity and transparency.

1/ More flexibility about the “10%” rule

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.

2/ Possibility to adapt the level of indirect costs

It is recognised in many member states that indirect costs represent more than 7% of the total budget³. This limits the possibilities for some organisations to participate. The ratio for indirect costs should be at least between 15% and 20%.

3/ Simplifying amendment requests

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.

4/ Late payments and unequal instalments procedures

Many organisations reported late payments with money arriving 3-4 months after the project has started, with very negative impact on delivery. Rules also differ on the way the money is distributed (instalment procedures). In specific cases the EU gives most of the grant (80%) at the beginning of the project as it is the case already for Grundtvig “Learning Partnerships” in other case it is much less (30%). More flexibility is necessary if we want smaller organisations to take part.

SPECIFIC RULES FOR OPERATING GRANTS

1/ Recognising 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. Contributions in kind can either be voluntary or pro-bono. Volunteer work is the specificity of civil society organisations; not recognising it would impede their participation in the programmes as well as send a negative message especially in the framework of the European Year 2011.

2/ Indirect costs should be applicable

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.

3/ Suppress the non-profit rule

Organisations that use 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 these projects are not related to the activities carried out for the operational grant. This rule is unsustainable and does not support the development of civil society. It should be re-examined. The best solution would be to exclude organisations pursuing European general interest from the scope of the non-for-profit rule by ensuring that this surplus is not redistributed. A built-in tolerance of 20% would help.

4/ Flexible co-funding ratio

More flexibility should be allowed on the percentage ratio of co-funding for not-for-profit making organisations, for small and average-sized organisations that do not already receive 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. If the authorising officer is allowed to adapt the rules today, we observe strong differences in the way the rules are implemented. It is important to provide clear guidelines to authorising officers.

MANAGEMENT AND EVALUATION

1/ Improving the selection process

The selection process should be reviewed. It is now distant and dialogue is lacking. Furthermore, more transparency is requested on the way applications are evaluated and quality feedback should be given to applicants. Decision-making should

³ In the UK the national survey on indirect costs (Surer) undertaken by the Association of Chief Executives of Voluntary Organisations in 2005 proved that organisations incur 15-20% indirect cost to deliver a public contract. This was acknowledged by the government and a new system was adopted for public funding. “Better Return on Investment” policy briefing note, September 2010.

be faster and more transparent.

2/ Evaluation based on evidence

The European Commission and the Agencies should focus more projects' evaluation on evidence (results). It is reported that auditing requirements represent a huge burden on the time and resources of civil society organisations. The amount of paperwork that is to be kept by applicants during many years is huge. Changing evaluation rules and developing the use of lump sums or flat rates would be more cost effective and of greater value for tax payers.

3/ Co-management of EU programmes

A solution to improve the system could be to implement co-management in the governance of programmes while further reflection is needed on its modalities. This is currently the case of the European Youth Foundation of the Council of Europe. This model could serve as a good example for the EU.

Sincerely yours,



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