



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

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### ***EUCIS-LLL gathers 19 European networks active in education and training:***

**AECEE:** European Students'  
Forum

**EAEA:** European Association for  
Education of Adults

**EAICY:** European Association of  
Institutions of Non-Formal  
Education for Children and  
Young People

**ECSWE:** European Council for  
Steiner Waldorf Education

**EFFE:** European Forum for  
Freedom in Education

**EfVET:** European Forum of  
Technical and Vocational  
Education and Training

**EPA:** European Parents  
Association

**ETDF:** European Training and  
Development Federation

**EUCEN:** European University  
Continuing Education Network

**EUROCLIO** European  
Association of History Educators

**EURO-WEA:** European Workers  
Education Association

**EVTA/AEFP:** European  
Vocational Training Association

**FECCA:** European Federation  
For Catholic Adult Education

**FEEC:** European Federation for  
Education and Culture

**FICEMEA:** International  
Federation of Training Centres  
for the Promotion of New  
Education

**IAEC/AIVE:** International  
Association of Educating Cities

**ISCA:** International Sport and  
Culture Association

**SOLIDAR:** European Platform  
on Social Affairs, International  
Solidarity and Lifelong Learning

### SUBJECT: FUTURE OF THE LLL PROGRAMME & REVIEW OF THE FINANCIAL REGULATION

The European Commission has launched a public consultation on the review of the Financial Regulation. In this context, the programmes will also be evaluated. The members of the platform are essentially working with the Lifelong Learning Programme (LLP) and have thus decided to share their experiences on this programme.

EUCIS-LLL collected ideas from the different sectors represented within it in order to give a more transversal perspective on how to ameliorate the next generation of programmes. Some of our members will directly contribute to these debates in the frame of the public consultation on the financial regulation as well as on the sub-programmes (COMENIUS, LEONARDO, GRUNDTVIG, ERASMUS) that concern more particularly their sector of activity.


**EUCIS-LLL members find the LLP extremely important and underline that they have had very positive impacts on their work, their organizations and their countries. Most are happy with the LLP current structure.**

They nevertheless outline that it is **very difficult for small or medium organizations (training centres, associations, etc.) to access EU programmes.** This is due to many reasons that we organized in the following way: → accessing information → getting started → building an application → managing a project → being evaluated.

We also tried to **point out elements that are specific to civil society organisations.** Indeed, non-profit making organisations need to raise funds in order to function. If the European Commission represents an important contributor, the implementation of the actual financial regulation often prevents them from taking part in EU programmes. This is regretful as they participate in the creation of a European civil society and represent a real added value for Europe. **The revision of the financial regulation should aim towards their greater participation.**

Some also outlined that the implementation of transectoral networks or projects is still limited. They thus invite the European Commission to propose more transectoral actions in the next budgetary period. This would give **more coherence between the policy level that supports lifelong learning strategies and the programme level which mainly supports sectoral projects.**

**Most of our proposals concern the simplification of administrative and financial procedures. They could apply to many other programmes! We also invite the Member States to increase the overall budget allocated to EU programmes and more particularly to the LLP in the next budgetary period.**


 Accessing information

First of all, organisations do not have the same **access to information**. Many small organisations still do not know about the programmes - even if very good websites exist. If an organisation starts thinking about developing EU projects, they have a lot of difficulties to find the right information and also to distinguish which programmes are relevant for them. There is an **important need for guidance in these first steps!**

Participation is very much hampered by the fact that the information does not reach many in the field. A greater outreach is necessary. Some of our members suggest that the EU **identifies specific target groups** to whom information and promotion be directly targeted. To reach these publics, the **National Agencies could also rely on the various associative networks**.

In some countries, **language is also an important barrier**. Some National Agencies propose **training sessions** in order to “unblock” potential applicants notably in English. This kind of actions is very positive but here again, it remains little known. We also regret that **many European Commission’s websites are only available in English**. We understand that it is almost impossible to have them in 23 languages but they should **at least be available in the 3 EU official languages**.

In order to clarify the opportunities, the EU could support initiatives that would provide a **global guidance and assistance at national or regional levels**. Today, the grants for technical assistance are always linked to a specific programme. **A budgetary line could thus be created in order to support “cross-programme information points”**. Of course, they would not replace National Agencies which very important role has been acknowledged in all the contributions. Their role would rather be to guide the applicants in their “first steps” and send them to the right interlocutors within the National Agencies.

Some members also outlined that the EU website was not easy to navigate on and was very complicated. **More coherence is notably needed between the different websites of the DGs as regards the call for proposals or tenders**.


 Getting started

When potential candidates do get the information, they are frequently **discouraged by the application procedures** as well as by the administrative burdens that come with managing EU projects.

**Many organisations do not have the time and competences to prepare an application**. They need to find partners, to agree on a common project, etc. - which is a normal process - but they also have to do the “state of the art” research before the project starts in order to prove the “innovation” criteria asked to applicants. It is thus 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**.

If many organisations cannot engage in European projects because of the difficulties mentioned above, others have become “experts” or even “specialised” in EU projects. Some of our members have thus the feeling that **the competition is based on the capacity to build nice applications (putting all the “key words”) rather than on the capacity to build interesting projects**.

Indeed, the application forms mirror the political criteria that are used (UE long-term and annual priorities, European Years, particular political context, etc). It is difficult for new applicants to understand and integrate this political background. Furthermore, the application forms contain many questions that are not always linked together. As a result, applicants have difficulties to give a coherent overview of the project “who, what, why, when, for whom and how” (i.e. Leonardo application form DG EAC/31/08) - that is not limited to the “250-words-description” in the first part of the application. Some of our members thus invite **the European Commission to be more careful that the application forms are coherent and understandable** for the applicants as well as for the experts.

Some of our members also propose to **simplify the application procedure by registering the organisations**. This procedure could be annual and result in giving a “code” to organisations - in a similar way that the European Commission’s experts have a code that refers to their financial and personal data. This would save a lot of time and energy for those preparing the projects, as well as for those checking them.

The **deadlines were also mentioned as an obstacle**. Most of our members organize conferences or seminars with the support of study visit schemes. They often take small actions relating to ensuring that applicants are stimulated to receive the grants. They nevertheless outline that it is difficult for them to work with very early deadlines. Teachers, for example, often need time to negotiate with their school heads in order to be able to participate in European seminars.

Finally, some members outline that the fact that **some National Agencies add national rules to EU rules** creates a lot of confusion for applicants. One member mentioned a study visit organised for a mixed group of school heads, policy makers, teachers and teacher trainers. According to European criteria their application was completely reasonable, but one National Agency decided that this programme was not for the teachers and did not accept their application. **The use of national rules should be limited or at least be made more explicit to applicants.**

Preparing an application

**The budget is an important - if not the greatest - obstacle when preparing an application form.** The rules can be very complicated in some programmes. For example, it is very difficult for a private vocational training centre to reach the objectives of a Leonardo Transfer of Innovation - whose expected results have to be quite ambitious for the project to be accepted in the first place - with the maximum budget allocated to the project.

**The actual budget rules do not allow all the expenses to be taken into account:** indirect costs maximum 7% when they represent more than that ; no possibility to buy any material for the project management activity; etc. These rules probably result from past excesses that have to be prevented, but they tend to limit the possibilities for such organisations to invest into these projects. **For instance, the ratio for indirect costs should be at least between 10% and 20%.**

Some members also outline that they should be able to **ask for indirect costs (general expenditure) when they apply to call for proposals even if they receive an operational grant**. Indeed, every new projects generates such expenditures.

Some of our members also ask for more **flexibility in the procedure of instalments**. Indeed, according to the projects, some organisations cannot afford to advance the money. The EU could, in specific cases, **give most of the grant (80%) at the beginning of the project** as it is the case for Grundtvig “Learning Partnerships”.

**The co-funding rule is also problematic especially for civil society organisations**. 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. Some members mention that **National Agencies and the European Commission could encourage local and national authorities to invest more into these European projects**.

**More flexibility could also be introduced on the percentage of co-funding** between non-profit making organisations and profit-making organisations, between small and medium organisations and those already receiving important funding at national or regional levels.

**The co-funding rule is also problematic for European civil society networks**. Indeed, they generally do not receive funding from governments (as they are European) and depend on EU funding to run some of their activities. These organisations play a crucial role in informing and involving education and training actors in EU cooperation and should thus be supported by the European Commission. Our members thus stressed the need to **increase the budget allocated to European organisations in education and training as well as to lower the co-funding ratio** in order to take into account their specificities.

Furthermore, our networks often function thanks to the work of volunteers. The current regulation (article 172) mentions that the Authorising Officer can allow the recognition of volunteers’ work but in practice this is seldom the case. **Today, their participation is rarely taken into account because they do not receive salaries**. A solution should be found in order to recognize their work. For instance, the European Commission could **propose indicative daily allowances or ask the applicants to justify an equivalence for their daily salaries** based on employees that perform similar tasks (based on the EQF levels for example).

**The pre-financing guarantees** required by EACEA for the European projects could stop consortiums that have already been selected. Indeed, for instance, Belgium banking or financial 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 Belgium law. This is an **important barrier that should be addressed**.

**Most of our colleagues point out that lump sum tend to be easier**. They enable smaller organisations to take part in EU projects. Some programmes, like Grundtvig “Learning partnerships”, are given as good examples. In that programme, applicants do not need to build complicated budgets. They receive a global grant and commit themselves to a certain number of mobilities and results. The evaluation is thus mainly qualitative - and not on how each Euro is spent.

Managing projects

Today, an important part of the budget is dedicated to the administrative and financial management of the project because the organization has to explain exactly each euro of expense. Yet the fact that the expenses can be precisely justified does not guarantee the quality of the results and the impact on the target group, so this time and money consuming administrative process does not seem very effective. It may be more relevant for the Commission to evaluate the evidence, i.e. the results.

More flexibility should also be given in order to reallocate parts of the budget (“10% rule”). Indeed, it is impossible to plan the exact costs nearly one year in advance. Hence, applicants may plan more money than necessary in one “box” while they did not plan enough in another. The possibility to adapt the budget according to real costs should be easier. Of course, this would have to be justified and accepted by the managing authorities.

Other financial rules are mentioned as being very rigid. For example, the eligibility period should be based on the activities and not on the day of purchase. For instance, 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 in order to spend less money.

According to some of our networks, the non-profit rule is not flexible enough. Organisations that use the EU Operating Grant 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 each time, 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: non-profit-rule should be re-examined. Does it help create sustainable non-profit organizations or does it just stimulate “creative” accountancy?

Other difficulties have been mentioned such as exchange rates and the existence of different accountability systems which can complicate the financial reporting.

Being evaluated

Concerning the evaluation of the applications, a lot of our members mentioned doubts about the capacity of experts to understand the specific field they were working in. Some even expressed difficulties with external experts and their understanding of innovation, the state of the art of adult education, vocational education, etc. For example, a few members mentioned projects that were supported at the political level - by the European Commission’s units - but were rejected by the Executive agency as not corresponding to EU political priorities!

The management of programmes at EU level needs to be evaluated notably in relation to the development of executive agencies such as the Executive Agency for Education, Audiovisual and Culture. Some of our organisations see a risk in the fact that there is an increasing institutional disconnection between the policy and the programme levels.

More transparency is also requested on the way calls for proposals are evaluated. Quality feedback should be given. Some members felt it was difficult to get their evaluations or a response when they did not agree with a particular point in their evaluation.

Furthermore, all the networks that benefit from operational grants outline that the EACEA should consider them for what they are, civil society networks and not projects! For instance, most of the time, their work programme is linked to the European political agenda which is always evolving and thus difficult to foresee. One of our members was going to organise a specific working group to prepare an International governmental meeting. But when this political meeting was postponed it was impossible to postpone the working group because the EACEA would not accept a modification of the initial work programme. Such rigidity has a very negative impact on our activities and does not contribute to the sustainability of civil society organisations.

#### MEMBER STATES SHOULD INVEST MORE IN MOBILITY PROGRAMMES!

Our members would like to see more investment and an extension of the current programmes, notably the Lifelong Learning programme. **Today, it represents around 0,8% of the total EU budget.** This limits greatly its impact. On the one hand, Member States have recognized at several occasions that each citizen should be given the chance to access mobility but on the other hand they agreed to limit the EU budget to around 1% GDP. **Political priorities should be put into practice!**

Many studies have shown the positive impact of mobility on individual's personal and professional developments. But today, there is an unequal access to mobility programmes which remain generally limited to the most privileged. **EU programmes should aim to give everyone the possibility to participate which implies sufficient financial support and information!**

When preparing the next budgetary period (2014-2021), we thus invite the European Commission to work with the European Parliament and the Council in order to promote an EU budget defined according to the general interest and not to national interests. In 2008, an Eurobarometer (n°70/Autumn 2008) showed that 30% of Europeans wished that the European budget be spent on education and training.

**Member States should support the construction of a European era of knowledge and of citizens. In times of crisis, it is even more important to invest in our future!**

Yours sincerely,

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