





# b-solutions

# FINAL REPORT BY THE EXPERT

Advice Case: Shared cross-border public services: French-German crèches

Advised Entity: Eurodistrict SaarMoselle EGTC, FR-DE

**Expert:** Euroinstitut

#### Table of content:

- 1. Description of Obstacle
  - 1.1 Co-financing of running costs
  - 1.2 Tax implications
  - 1.3 Staff qualification
  - 1.4 Safety rules
- 2. Indication of the Legal/Administrative Dispositions causing the Obstacle
  - 2.1 Co-financing of running costs
  - 2.2 Tax implications
  - 2.3 Staff qualification
  - 2.4 Safety rules
- 3. Description of a Possible Solution
  - 3.1 Co-financing of running costs
  - 3.2 Tax implications
  - 3.3 Staff qualification
  - 3.4 Safety rules
- 4. Pre-Assessment of whether the case should be solved with the European Cross-Border Mechanism
  - 4.1 Co-financing of running costs









- 4.2 Tax implications
- 4.3 Staff qualification
- 4.4 Safety rules
- 5. Other Relevant Aspects to this Case
- 6. References and Appendix/Appendices
- 7. List of abbreviations









# Description of the legal or administrative obstacle in the specific context

## Basic information about the project

The French-German crèche that is to be built in Saarbrücken is part of an Interreg project that will co-finance the development and construction of two cross-border crèches, one in Germany, the other in France. Within this consultation, we will **focus on the crèche to be built in Germany**, as the project for the cross-border crèche planned in France is not very advanced yet.

The lead partner of the project is the Eurodistrict Saarmoselle. The other partners are the city of Saarbrücken, the *Communauté d'Agglomération Sarreguemines Confluences CASC* (grouping of municipalities Sarreguemines, hereafter referred to as **CASC**), **ALYS** Moselle, a French association for family assistance. The methodological partners are the Ministry for Education of the Saarland, the *Regionalverband* (district) of Saarbrücken, the towns of L'Hôpital (France), Völklingen (Germany), the French *Caisse d'Allocations Familiales CAF* (family allowance fund, herafter referred to as **CAF**), the *Protection Maternelle et Infantile de Moselle*, PMI (centre for maternal and child care, hereafter referred to as **PMI**), the Grand Est Region and finally Proemploi, a Belgian association wishing to get more information about the project.

Beyond the Interreg project, there will be co-financing by the Saarland, the *Regionalverband* (district) of Saarbrücken and the CAF.

The **main objectives** of the project are to offer a common crèche to the families living on both sides of the border, to encourage everyday contacts between French and German families and, last but not least, to develop bilingualism from the earliest age.

The project will be financed in one third by French and in two third by German partners. There will be 33 places, and, proportionally to the financing conditions, 11 places are provided for French children and 22 for German children.

The French-German crèche case is very interesting because it clearly shows, that even very expert stakeholders in the field of cross border cooperation, in a region









where the cooperation is well developed, have to face difficulties they are not able to resolve by their own due to legal obstacles.

In the present case, the identified obstacles concern the fields of

- Cross-border co-financing that may be granted for the building and managing of a public service facility
- 2. Tax implications (property tax, VAT)
- 3. Staff qualification
- 4. Safety rules

The applicant explains that part of these aspects should be considered separately for the building and the future managing phase. Furthermore, the applicant states that although the above issues have been identified within the context of the construction of the French-German crèche, he is convinced that the same problems may occur when developing any cross-border service.









# 1.1. Co-financing of running costs

As a matter of fact, the concerned project partners participate in the running costs of crèches in order to reduce the fees parents will have to pay. There are clear rules concerning this aspect for crèches in their own country or *Land* (for the German case). However, the rules on which this institutional financial participation depends are not the same in both countries and they are, in our case, not applicable in the neighbour country.

More concretely, in France there is the principle of optimization of the crèche places through the practice of multiple use of the places, e.g. one child is attending early in the morning and leaves at 12, the other arrives only in the afternoon. In Germany, however, this procedure is not applied. The French CAF pays for crèches in France the PSU (*Prestation de service Unique* = operating aid to crèches) which is calculated based on the costs for the crèche places. A crèche located in Germany cannot count on the PSU because the above conditions are not met.

As far as Germany is concerned, the Saarland would not be able to contribute to financing crèche places in a facility located in France since the implementing regulations of the Saarland Act on the care and education of children stipulate that Saarland can only co-finance nurseries located on its territory. (This would be relevant for the second crèche which is part of the Interreg-Project).

# 1.2. Tax implications (property tax, VAT)

a) There are differences in VAT legislation that will have consequences on the project amount.

Situation in Germany: The German partner cannot recover VAT (19 %) on construction and installation costs, because the following service (crèche) is VAT-exempt.

Situation in France: A French municipality that implements a crèche does not have to pay VAT for construction and equipment costs.

As a result, VAT will be part of the total amount of construction and equipment costs and the French municipality will have to pay it proportionately. Consequently, the









French municipality pays 19% more than it would have to pay for a crèche built in France.

b) Property tax: There are also some questions with regard to property taxes. For the French municipality it seems to be difficult or impossible to pay property taxes for a building that is located in the neighbour country.

## 1.3. Staff qualification

A particularly sensitive aspect is staff qualification. It is not astonishing at all that there are differences in the professions and the job descriptions of crèche employees in France and in Germany. This is linked to system differences: in Germany, the *Kindergarten* for children from 3 to 6 is quite important, and very often *Kindergarten* and crèche are mentioned and also managed together. In France, on the other hand, crèches and *école maternelle* (for children from 3 to 6) do not work in the same context. The *école maternelle* (preschool) is entirely part of the public education system. Therefore, in France, we have specialized professionals for the age group 0-3 whereas in German crèches we have partly the same professions as in the *Kindergarten* that takes in charge children from 3 to 6.









Apart from that, comparability and recognition of professional qualifications is a question that appears in many other fields, too.

Which **professions** do we find in German and French crèches?

With regard to **France** we have essentially three professions: *éducateurs de jeunes enfants* which can be translated by early childhood educator, *auxiliaire de puériculture*, which means "childcare auxiliary", *CAP Accompagnant éducatif petite enfance* (early childhood educator assistant). The orientation of these childcare assistants is clearly a sanitary one. This sanitary orientation is reinforced by the fact that in France, the director of a crèche is has to be a nursery nurse or a doctor, in certain instances an educator. We can thus state that, besides education, **health and care** play an outstanding role in French crèches.

In **Germany** on the other hand, the essential professions are *Erzieher/in* and *Kinderpfleger/in*. The German term of *Erzieher* means indeed "educator". Still, in Germany, educators are qualified for the work in the *Kindergarten* and the *crèches*. This explains that their self-conception corresponds more to a preschool teacher than to a childhood educator. The second professional group we can find in German crèches are *Kinderpfleger*, childcare assistants, whose tasks are similar to those of the French *auxiliaire de puériculture*, i.e. educational but also caring tasks. The director of a crèche is an educator with an additional training. Based on these professional orientations, one can conclude that crèches in Germany put the focus on **educational aspects**.

Concerning the case of the French-German crèche in Saarbrücken, the Saarland authorities **do not recognise the diplomas** of French staff. German partners justify this approach by the different concepts (see above).

The questions concerning the staff imply financial questions, too. Actually, besides qualification, there are differences with regard to **staffing ratios**. If the minimum requirements of both countries are combined, the running costs of the crèche would be much higher than in the case of a national facility.

Yet, the supervisory authorities of both countries will have to give the authorization to open the crèche in order to receive the co-financing of running costs from the usual co-financers of both countries.









# 1.4. Safety rules

In the field of early childhood care, safety is an important aspect. Parents want to be sure that their children are taken care of in the best conditions, as far as health and safety is concerned. So, child care providers are obliged to prevent illnesses, injuries and any other risk.

Even if the objectives concerning children's safety are probably the same in both countries, the measures to achieve them are different, which is partly due to divergent sanitary and educational approaches.

Yet, in order to obtain the authorization to open a childcare centre, safety rules are an indispensable condition that must be fulfilled, and, in our case, for both countries. One possibility would be to combine the standards of both countries. But this would make the project much more expensive than a national project and it would be unlikely that the project could be realised more often than one time. Moreover, it is hard to imagine a crèche with double safety standards: would this be a pleasant and inspiring environment for children, educators and parents?









One important difference are vaccinations. In fact, rules are stricter in France than in Germany.

Evacuation in case of fire would be managed in a different way in France than in Germany. To illustrate this, the example of the evacuation of babies might be useful: In France, there must be enough children's beds on wheels in order to put several babies in one bed and to be able to evacuate several children simultaneously in a safe and timesaving way.

In Germany the fire departments have important competences before the opening of a facility with regard to fire protection.

Furthermore, there are questions about safety equipment, e.g. child safety gates on the top of stairs.

Besides questions of equipment and health, there are functional questions, too. Is it possible that children play by their own in an adapted room? Will the facility work with age mixed or age wise groups?

# 2. Indication of the legal dispositions causing the obstacle

### 2.1 Co-financing of running costs

#### France:

The principle of optimization of the crèche places is based on the circulaire 2014-009 du 6 mars 2014 (administrative regulation)

#### **Germany:**

The German partners refer to the Verordnung zur Ausführung des Saarländischen Kinderbetreuungs- und -Bildungsgesetzes (Ausführungs-VO SKBBG) vom 2. September 2008 (Saarland Act on the care and education of children). The exact article that lays down the stipulation stating the Saarland cannot contribute to financing crèche places in a facility located in France could not be identified. It can, however, be assumed that the Saarland regards that regulation as valid per se only for the Saarland.

### 2.2 Tax implications (property tax, VAT)



France:







Art. 1615, CGCT

« ...Les établissements publics de coopération intercommunale et les syndicats mixtes exclusivement composés de membres éligibles au Fonds de compensation pour la taxe sur la valeur ajoutée bénéficient, en lieu et place de leurs membres propriétaires, des attributions du Fonds de compensation pour la taxe sur la valeur ajoutée au titre des dépenses d'investissement exposées dans l'exercice de leurs compétences... »

"...Public institutions for intermunicipal cooperation and mixed unions composed exclusively of members eligible for the Value Added Tax Compensation Fund shall benefit, in place of their owner members, from the allocations of the Value Added Tax Compensation Fund in respect of investment expenditure incurred in the exercise of their competences.... »









Art 261 CGI, Abs. 8° bis

[Sont exonérés de la taxe sur la valeur ajoutée : ...] Les prestations de services et les livraisons de biens qui leur sont étroitement liées, effectuées dans le cadre de la garde d'enfants par les établissements visés aux deux premiers alinéas de l'article L. 2324-1 du code de la santé publique et assurant l'accueil des enfants de moins de trois ans

[Are exempt from value added tax:...] The supply of services and closely related goods, carried out in the context of childcare by the establishments referred to in the first two paragraphs of Article L. 2324-1 of the Public Health Code and providing care for children under three years of age.

#### **Germany:**

Umsatzsteuergesetz In der Fassung der Bekanntmachung vom 21.02.2005 (<u>BGBl. I S. 386</u>) zuletzt geändert durch Gesetz vom 11.12.2018 (<u>BGBl. I S. 2338</u>) m.W.v. 01.01.2019 (UstG) (law regarding VAT)

# 2.3 Staff qualification

#### **European Union:**

DIRECTIVE 2005/36/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCILof 7 September 2005on the recognition of professional qualifications

#### France:

Code santé publique (law on public health): article R2324-33 CSP et seq

#### **Germany:**

Gesetz zur Verbesserung der Feststellung und Anerkennung im Ausland erworbener Berufsqualifikationen vom 6. Dezember 2011

Law to improve the identification and recognition of professional qualifications acquired abroad, December 6, 2011









Website « Ministerium für Bildung und Kultur », Saarland, Bildungsserver : Konzept D-F Kitas, hier: Verfahren der Äquivalenzanerkennung bei Personen mit französischen nichtakademischen Abschlüssen als Kinderpfleger\*in bzw. Erzieher\*in Kindertageseinrichtungen

Procedure of equivalence recognition for persons with French non-academic qualifications as child carers or educators in day-care centres for children

§3, Abs. 5 Saarländisches Kinderbetreuungs- und - bildungsgesetz (SKBBG)Gesetz Nr. 1649. Saarländisches Ausführungsgesetz nach § 26 des Achten Buches Sozialgesetzbuch = Saarland Childcare and Education Act (SKBBG) Law No. 1649.

Saarland Implementation Law according to § 26 of the Eighth Book of the Social Code)









# 2.4 Safety rules

#### France:

- Operating permit :
  - Code de la santé publique (law on public health): article R2324-18:
- Vaccination
  - Code de la santé publique art. L3111-2 (law on public health): article L3112-1
  - Code de la santé publique art. L3112-1 (law on public health): article L3112-

## **Germany:**

- o Operating permit
  - Deutsche Unfallversicherung (German accident insurance): DGUV Regel 102-002
  - Sozialgesetzbuch (SGB) Achtes Buch (VIII) Kinder- und Jugendhilfe (Artikel 1 des Gesetzes v. 26. Juni 1990, BGBl. I S. 1163) § 45
    Code of social law VIII child and youth welfare
- Vaccination:
  - Gesetz zur Verhütung und Bekämpfung von Infektionskrankheiten beim Menschen (Infektionsschutzgesetz - IfSG) - § 34 Abs. 10a
  - Law for the Prevention and Control of Infectious Diseases in Humans 20.07.2000
- 3. Roadmap towards a possible solution of the obstacle with indication of the entities to be involved in the possible solution
  - 3.1 Co-financing of running costs









For the obstacle concerning the co-financing of running costs, the project partners have found a solution that seems quite practical. The crèche to be built in Saarbrücken is actually part of an INTERREG project that will finance two cross-border crèches, one in Germany and one in France. So, the partners decided to share the responsibility. The city of Saarbrücken, Germany will take over the management for the facility in Germany, the association ALYS (France) will manage the French crèche. But this solution is only possible in this specific constellation of two planned crèches, and the project partners would like to know which other solutions could be possible.

As for the PSU (*Prestation de service Unique* = operating aid to crèches) which should be paid by the French **CAF**, a special system could be applied. Yet, there would be the problem of sustainability. The financing could only be guaranteed for five years, whereas the cooperation of the project partners has been agreed for 20 years.









# 3.2 Tax implications (property tax, VAT)

Up to now a solution has not been found for this type of problem which is typical for cross-border facilities that provide a public service.

In France and in Germany, tax legislation is done on the national level. Thus, it seems to be difficult to find a flexible solution which can be adapted to the border region or which can be decided on a regional or local level.

However, for these specific problems, it is appropriate to consider the ECBM (see chapter IV.) and the recently concluded Franco-German Treaty of Aachen. In its Article 13 (2), the Aachen Treaty stipulates amongst others that regarding border regions "...provision may be made for adapted laws, regulations and administrative provisions, including derogations. In this case, it is up to both States to introduce the relevant legislation. ...". The Treaty of Aachen seems to be more appropriate for this case.

# 3.3 Staff qualification

As for now, the Saarland refers to a specific training for foreign nursery staff that has been existing since 2001. As a matter of fact, it is necessary for staff with a French diploma who wish to work in a Saarland crèche to have additional training in methodology and didactics (*Qualifizierungsmaßnahme Methodik-Didaktik*). This training contains 150 hours within one year. The staff can participate in this training course while working in a German facility. The training concludes with an examination. The objective of the course is to make French professionals aware of the working methods and the pedagogy applied in Germany and especially in the Saarland.

As explained in chapter I., the philosophies in French and German crèches are different. This can also be stated concerning the school systems and family culture, i.e. the place of families in the society and parents' roles. There is a real cultural gap between the two systems. What can cross-border cooperation perform in such a situation? Does it make sense to try to adapt French professionals to the German system? Of course, as it was mentioned during our discussion, it is interesting for French professionals to learn additional contents and to become more and more aware of the German educational









system and philosophy. But this should at least work in both directions. It is not enough to **know** these circumstances; especially when working with children and their families, it is essential to **feel perfectly integrated** in the binational team and, more than that, to **identify** oneself with the crèche and its goals.

French-German meetings on this topic have already taken place.

How can we achieve this objective? I would like to point out two complementary ways:

 The professionals employed are trained about the educational system in both neighbour countries. Thus, they should understand the objectives and processes in both countries, but also the role and the expectations of the parents. This would allow dynamic and comprehensive exchanges between the colleagues even if one system will be prioritised.









2. A new cross-border concept is created. This means that the educational concept for the crèche would not be German or French but "cross-border". A working group could identify the most important goals which could for example be a certain level of bilingualism, autonomy, self-reliance, early learning, support for families, etc. This specific concept will be the base for further planning. How can these common goals be implemented? Which are the professionals we need for it?

§3 (2) Saarland Childcare and Education Act (SKBBG) stipulates: "The responsible body of the day care centre is in charge of the design and implementation of the educational mission."

This means that the responsible body that manages the crèche has a certain scope of action and that a common design is possible.

There are possibilities on the national level and on the Saarland level for the recognition of professional qualifications acquired abroad (s. chapter II). But for a common facility with a common concept or philosophy, the objective should be to recognize foreign qualifications in a simple, smooth and adaptable way. As in Germany, with its federal political system, the *Land* is competent for these questions, it might be possible to adapt the corresponding legislation, i.e. the Saarland Childcare and Education Act (SKBBG) Law No. 1649.

Regardless of which goals and contents, which personnel structure are finally chosen, it is essential not to lose sight of the cross-border idea, also with regard to daily work. This means that both educational systems have to come into their own. This would contribute to a high identification of all staff members, which is absolutely crucial for the success of the facility.

# 3.4 Safety rules

As far as solutions for the difficulties linked to safety rules are concerned, it is necessary to consider the different items:

Vaccination

Situation in France:









For children born after 2018, 11 vaccinations are **compulsory**. When the child is admitted to a crèche for a period of more than 1 year, the **proof of vaccination** must be presented each year.

#### Situation in Germany:

In Germany, 12 vaccinations are **recommended** for babies and toddlers.

Parents of children who will attend a crèche must deliver a **proof of a medical** vaccination advice for the protection of their child. This vaccination advice must take place just before the child enters the crèche (according to § 34 Abs. 10a IfSG).

In fact, the differences are fundamental. What would that mean in practise? If both countries pursue their logic, we would have the following situation for the crèche located in Germany: French children that are vaccinated will stay with German children, of whom about 90 % are vaccinated. At first glance, this seems to be relatively unproblematic. However, experts should check whether the non-vaccinated children pose a danger to the group.









#### - Safety equipment.

With regard to the safety equipment of crèches, there are numerous regulations concerning floors, glazing, walls, stairs, doors, windows, toys, etc., which certainly do not coincide in every respect in both countries. The aim cannot be to multiply these regulations, but to use the existing legal scope to find the best possible compromise. As already advised in the section on staff qualification, these points should also be dealt with in a mixed working group in order to be able to develop a sustainable and broad basis.

This is important not only because too many regulations are impractical, complex and expensive, but above all because educators, parents and children should fully identify with their environment.

## Fire protection

As far as fire protection and evacuation concepts are concerned, I would advise to adhere to the local conditions. Cooperation with the local fire department seems to be indispensable and is necessary in order to obtain the opening permit.

# 4. Pre-assessment of whether the case could be solved with the European Cross-Border Mechanism

In a lately realized "Cross-border review", the European Commission gathered evidence that border regions generally perform less well economically than other regions within a Member State. Navigating between different administrative and legal systems is often still complex and costly. As a consequence, the Commission adopted its Communication "Boosting growth and cohesion in EU border regions. Within the 10 points' action plan that the Communication proposes one point specifically addresses legal and administrative border obstacles, and one specific action referred to in point nine of the Border Regions Communication refers to an initiative started under the Luxembourg Presidency in 2015: A mechanism to resolve legal obstacles in border regions. The subject matter is a mechanism to apply, for a common cross-border region, in a given Member State, the legal provisions from the neighbouring Member State if applying its









own laws would present a legal obstacle to implementing a joint project. The Mechanism consist in concluding a European Cross-border **Commitment**, which is <u>self-executive</u>, or a European Cross-border **Statement**, which requires a further <u>legislative procedure</u> in the Member State.<sup>1</sup>

The European Cross-Border Mechanism (ECBM) has not yet entered into force. However, in the context of this study, it is essential to examine its potential applications to the identified legal obstacles.

<sup>&</sup>lt;sup>1</sup> Cf. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018PC0373&from=EN 12.10.2019









# 4.1 Co-financing of running costs

<u>Problem 1</u>: The PSU (French operating aid for crèches) can only be paid if, in the crèche located in Germany, the principle of optimization of the crèche places is respected.

This problem may be solved by the ECBM: Germany i.e. the Saarland could be requested to "pull over the border" the legal provisions of France (Articles 10 and 11) which would mean applying the principle of optimization, which would enable French authorities to pay the PSU for the children cared for in the crèche located in Germany.

<u>Problem 2:</u> As far as the obstacle faced by the German partners is concerned (cofinancing only for facilities located in the Saarland), I would advise to examine first whether a wider interpretation of the SKBBG (Saarland Act on the care and education of children) would allow further opportunities for cooperation.

# 4.2 Tax implications (property tax, VAT)

The differences in tax legislation that lead to additional costs for the French partners are a characteristic legal obstacle, which cannot be solved with the existing possibilities. Consequently, it would be a typical case to be solved by the ECBM. The "initiator" that would probably be the Eurodistrict Saarmoselle would prepare an initiative document covering the elements listed in article 9: amongst others a description of the joint project and of its context, a list of the specific legal provisions that come into question and a justification for the area of application (minimum necessary). This initiative would be sent to the competent Cross-border coordination point that would analyse the initiative and decide whether to launch a procedure leading to the conclusion of a Commitment or Statement, whether the legal obstacle is "real" and whether for one or more legal obstacles a resolution has been found which could be applied. The initiator may be asked to revise or add to its document.

# 4.3 Staff qualification

Staff and staff qualification are, like safety rules, essential matters that are strictly regulated in each country. This is positive because it ensures quality of education and safety for the children. The importance of these fields explains that the rules are generally firmly rooted, that modifications cannot be done easily.









On the other hand, one must be aware that the field of education is very strongly influenced by the cultures of each country. What is good, necessary and indispensable for children is quite different in each country. These are actually values that are deeply anchored and cause significant differences in legislation and rules. Besides this, persons on all levels of course identify themselves with these values, and it is quite difficult for everyone, managing authority, administration, educational staff, parents to question these values and the resulting rules.

So, the difficulty of staff qualification can't be solely solved by legislation. It is tremendously important that there is a solid common conceptual basis the persons involved can identify themselves with. The conceptual and the legal basis are the two pillars that can provide for a sustainable cooperation.









As explained in chapter III., there are procedures for the recognition of professional qualifications acquired abroad and the *Saarland* as a regional stakeholder might have the possibility to loosen the relevant legislation. Considering the cultural aspects associated with educational issues, a wide and general opening should have more sustainable results than the application of a single legal provision from the neighbouring Member State. Thus, for the question of staff qualification, I would not recommend the application of the ECBM.

# 4.4 Safety rules

Like staff qualification in the field of education, the safety of children is also a field, which can not only be considered at the technical and legal level. It is very important to make all involved persons aware of the challenge to accept regulations of the neighbouring country, even if they are different of what we are accustomed to. This is part of cross-border cooperation.

The sense of security and safety need are linked to cultural influences, traditions and experiences. It therefore makes little sense to impose rules in this area. If, however, the responsible authorities decide on a regulation that may be adopted from the neighbouring country, this should be done on a basis of trustful cooperation.

# 5. Other relevant aspects to this case

The applicant would like to deepen and to develop the results of this study together with an international lawyer. Upon request, we have provided the applicant with appropriate contact information.

As the applicant has laid down in the information sheet attached, they would have preferred the report done by a lawyer. It is indeed regrettable that the matching has not met the applicant's expectations. Yet, we hope that the report is nevertheless helpful. As a matter of fact, we documented and analysed the case corresponding to the given criteria and the findings will contribute to a better knowledge and comprehension of legal obstacles in cross-border cooperation. Moreover, the analysis of the case's









different aspects against the background of the ECBM allows to know much better and to present this new instrument and its applications. If our findings, concerning legal, technical, methodological and cultural aspects, can contribute to the project's success, we would be very happy.

We thank the Eurodistrict SaarMoselle for the good cooperation.









# 6. References

Oral and written information obtained by Ms. Prianon and Ms. Saillard, Eurodistrict SaarMoselle EGTC

Minutes about meetings of the project group for the establishment of the French-German crèche in Saarbrücken

Interreg application "Babylingua". Cross-border early childhood care structures

Summary: LEGISLATION ON THE AUTHORISATION TO OPEN AN EARLY CHILDHOOD CENTRE

Cooperation agreement between the City of Saarbrücken and CASC (Sarreguemines)

GUIDE DE LA T.V.A à l'usage des collectivités locales \_ L'application de la TVA aux collectivités locales

https://www.service-public.fr/particuliers/vosdroits/F607 Accueil en crèche = reception in a crèche, 15-10-2019

Verfahren der Äquivalenzanerkennung bei Personen mit französischen nichtakademischen Abschlüssen als Kinderpfleger\*in bzw. Erzieher\*in [sic] Kindertageseinrichtungen

= Method of equivalence recognition for persons with French non-academic qualifications as child carers or educators in child day-care centres

https://www.saarland.de/dokumente/thema bildung/Bilinguale Kitas Konzept August 20 18.pdf , 15-10-2019

Vertrag zwischen der Bundesrepublik Deutschland und der Französischen Republik über die deutsch-französische Zusammenarbeit und Integration, 22.01.2019

Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on a mechanism to resolve legal and administrative obstacles in a cross-border context

https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018PC0373&from=EN 12.10.2019

Legal dispositions mentioned in Chapter 2.









# 7. List of abbreviations

#### **CASC**

Communauté d'Agglomération Sarreguemines Confluences (grouping of municipalities Sarreguemines

**CAF** 

Caisse d'Allocations Familiales (family allowance fund)

**PMI** 

Protection Maternelle et Infantile (centre for maternal and child care)

**PSU** 

Prestation de service unique (operating aid to crèches)

VAT

Value added tax

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