

## **Amendments by the Association of German Social Welfare Organisations (BAGFW e.V)**

### **on the proposal of the European Commission for a regulation establishing Erasmus, the programme for education, training, youth and sport, and repealing Regulation (EU) No 1288/2013**

#### **Reasoning**

As a provider of social services, non-statutory welfare maintains around 105,000 facilities and services in Germany in which about 1.67 million full-time employees work. Services are provided on a non-profit basis and are geared to people's needs. The associations that are members of the Association of German Social Welfare Organisations (BAGFW) have decades of experience with international projects in the fields of vocational education, adult education, school education (day-care centers), and youth. They use the Erasmus+ programme as well as the predecessor programmes Leonardo, Grundtvig, Comenius and Youth in Action.

The BAGFW expressly welcomes the proposal of the EU Commission to establish Erasmus, the programme for education, training, youth and sport, for the funding period 2021-2027. The BAGFW supports in particular the continuation of the Erasmus programme in its current structure with three key actions, the distinction between the various educational sectors and the doubling of the budget. In addition, the improved accessibility of mobility and learning opportunities offered by the programme to learners with fewer opportunities is an important conclusion of the interim evaluation that has been taken into account, which is welcomed and encouraged by the BAGFW. The European and national diversity and inclusion strategies already developed for the youth field must also be extended to the other programme areas and applied in their implementation in order to make the Erasmus programme more accessible in all areas of education.

The synergy of the Erasmus programme with the other "Cohesion and Values" programmes is also to be welcomed and can encourage project promoters to make more effective use of EU funds and create European added value. The desired complementarity with other policies and programmes should be pursued as well.

Local and regional branches of non-statutory welfare still face considerable difficulties in terms of the usability and feasibility of the programme. The BAGFW therefore supports the aim of adapting and streamlining existing measures. In particular for learning mobility (key action 1) and strategic partnerships (key action 2), administrative barriers need to be removed and more flexible formats are needed to be developed. Formats must be created especially for organisations and institutions that are still inexperienced in transnational cooperation, which can easily introduce them to this form of cooperation and exchange.

At the same time, it must be ensured that institutions equipped with medium to good resources and European networking partners continue to have the opportunity to contribute their innovation potential within the framework of projects, analogous to the Strategic Partnerships to support innovation under the Erasmus+ programme. They often work in areas that are high priorities for the EU, such as strengthening social inclusion, basic skills, key competences or language and digital education. The institutions of non-statutory welfare want to continue to use their knowledge and skills in the future in order to contribute to the further development of the diverse educational landscape and to meet the different needs of the various organisations in the field of education in Europe.

On the basis of the experience gained in the current and previous funding periods, the BAGFW recommends that the proposed regulation be amended as follows:

**Proposal for a Regulation establishing Erasmus, the education, training, youth and sport programme, and repealing Regulation (EU) No 1288/2013**

Proposal of the EU Commission	Amendments by the BAGFW
<p><b>Recital(22)</b>            The Programme should offer young people more opportunities to discover Europe through learning experiences abroad. Eighteen year olds, in particular those with fewer opportunities, should be given the chance to have a first-time, short-term individual or group experience travelling throughout Europe in the frame of an informal educational activity aimed at fostering their sense of belonging to the European Union and discovering its cultural diversity. The Programme should identify bodies in charge of reaching out and selecting the participants and support activities to foster the learning dimension of the experience.</p>	<p><b>Recital (22)</b>            The Programme should offer young people more opportunities to discover Europe through learning experiences abroad. <b>Young individuals between 18 and 30 years</b>, in particular those with fewer opportunities, should be given the chance to have a first-time, short-term individual or group experience travelling throughout Europe in the frame of an informal educational activity aimed at fostering their sense of belonging to the European Union and discovering its cultural diversity. The Programme should identify bodies in charge of reaching out and selecting the participants and support activities to foster the learning dimension of the experience.</p> <p><b>Preparatory and follow-up seminars should be an integral part of the travel experience to provide language training, strengthen intercultural competences and stimulate reflection.</b></p> <p><b>These seminars should be organised by the sending organisations. These organisations should also be involved in the selection of participants and be points of contact for travellers throughout the trip.</b></p>

**Reasoning:**

Article 2(5) of the proposed regulation defines 'young people' as persons aged between 13 and 30.

Since it is not clear why the target group should be limited to 18-year-olds, the proposed regulation should strictly adhere to its own guidelines.

Travel activities alone cannot be regarded as an educational component, but should be combined with further informal learning experiences within the Erasmus programme, such as a youth activity or youth exchange, in addition to the travel experience. In this way, European added value is given and funding through the Erasmus programme is legitimised.

**Article 2 (11)**

'adult education' means any form of non-vocational education for adults after initial education, whether of a formal, non-formal or informal nature;

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'adult education' means any form of non-vocational education for adults after initial education, whether of a formal, non-formal or informal nature; **A main objective of adult education is to support social inclusion, active citizenship and personal development, as well as to transfer knowledge, competences and skills.**

**Reasoning:**

This sentence should be inserted to distinguish adult education more strongly from the human capital development aspect.

**Article 3 (1)**

The general objective of the Programme is to support the educational, professional and personal development of people in education, training, youth and sport, in Europe and beyond, thereby contributing to sustainable growth, jobs and social cohesion and to strengthening European identity. As such, the Programme shall be a key instrument for building a European education area, supporting the implementation of the European strategic cooperation in the field of education and training, with its underlying sectoral agendas, advancing youth policy cooperation under the Union Youth Strategy 2019-2027 and developing the European dimension in sport.

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Ziel des Programms

**Reasoning:**

The terms "education" and "training" are often understood in many languages as "formal" education and training. The addition of the terms "adult education" and "youth work" removes all doubts and shows that these non-formal and informal educational pathways are part of the Erasmus programme.

**Article 5**

In the field of education and training, the Programme shall support the following actions under key action 2:

(a) partnerships for cooperation and exchanges of practices, including small-scale partnerships to foster a wider and more inclusive access to the Programme;

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**Reasoning:**

With regard to the participation of institutions in education projects in Key Action 2, the proposed structure of the programme with the "Cooperation Partnerships" and the "Forward Looking Projects" under the "Innovation Partnerships" does not take into account the full range and diversity of existing institutions.

The new structure is mainly aimed at smaller and inexperienced institutions or those without European network partners (in the framework of "Cooperation Partnerships") as well as "key actors with a very good modern level of knowledge at a recognised high level" who wish to work on projects on European key priorities with the potential for implementation at system level (in the framework of "Forward Looking Projects").

Between these poles, there is a large number of institutions with medium or good resources and existing networking partners in other European countries that do not fall into either group. Under the planned structure, they would have little opportunity to participate in European education projects beyond networking projects. They often work in areas that are high priorities for the EU, such as strengthening social inclusion, basic skills, key competences or language and digital education. In order to ensure that their innovation potential for the development of concepts, curricula and materials does not remain untapped, it is necessary to introduce an "interim programme", which functions analogously to the strategic partnerships to support innovations from the "Erasmus+" programme. (Important characteristics: decentralised management, possibility of charging personnel costs, application of flat rates and unit costs for project implementation).

In this way, these institutions could continue to use their knowledge and skills to contribute to the development of the diverse educational landscape and to meet the different needs of the different organisations in the field of education in Europe (bottom-up approach).

**Article 9**

Cooperation among organisations and institutions

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**Reasoning:**  
See reasoning article 5.

<p><b>Article 14 (2(a)) Budget</b></p> <p>2. The Programme shall be implemented according to the following indicative distribution:</p> <p>(a) EUR 24 940 000 000 for actions in the field of education and training, from which:</p> <p>(1) at least EUR 8 640 000 000 should be allocated to higher education actions referred to in point (a) of Article 4 and point (a) of Article 5;</p> <p>(2) at least EUR 5 230 000 000 to actions in vocational education and training referred to in point (b) of Article 4 and point (a) of Article 5;</p> <p>(3) at least EUR 3 790 000 000 to school education actions referred to in point (c) of Article 4 and point (a) of Article 5;</p> <p>EN 34 EN</p> <p>(4) at least EUR 1 190 000 000 to adult education actions referred to in point (d) of Article 4 and point (a) of Article 5;</p> <p>(5) EUR 450 000 000 for Jean Monnet actions referred to in Article 7</p>	<p><b>Article 14 (2(a)) Budget</b></p> <p>2. The Programme shall be implemented according to the following indicative distribution:</p> <p>(a) EUR 24 940 000 000 for actions in the field of education and training, from which:</p> <p>(1) at least EUR 8 640 000 000 should be allocated to higher education actions referred to in point (a) of Article 4 and point (a) of Article 5;</p> <p>(2) <b>at least 5 490 000 000</b> to actions in vocational education and training referred to in point (b) of Article 4 and point (a) of Article 5;</p> <p>(3) at least EUR 3 790 000 000 to school education actions referred to in point (c) of Article 4 and point (a) of Article 5;</p> <p>EN 34 EN</p> <p>(4) <b>at least 1 250 000 000 EUR</b> to adult education actions referred to in point (d) of Article 4 and point (a) of Article 5;</p> <p>(5) EUR 450 000 000 for Jean Monnet actions referred to in Article 7</p>
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**Reasoning:**  
In the current programme, it is mainly the programme areas outside higher education, i.e. vocational training and adult education, where the financial resources made available are far from sufficient to meet the needs. In order to ensure that these educational sectors are given equal consideration in the overall increase of the programme, the percentage distribution should be taken over from the current programme regulation. A corresponding adjustment has been made with the proposed amendment by adjusting the share of the budget for vocational training to 22% and for adult education to 5% of the indicative budget, in

accordance with Regulation No 1288/2013. The proposal presented on 30.05.2018 does not guarantee an equal increase.

**Article 14 (2(b)) Budget**

2. The Programme shall be implemented according to the following indicative distribution:

(b) EUR 3 100 000 000 for actions in the field of youth referred to in Articles 8 to 10;

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**Article 8 (c) DiscoverEU activities will be served by a maximum of 10 %, with priority given to 'people with fewer opportunities' as defined in recital (22).**

**Reasoning:**

With the aim of making a 'social Europe' visible in the future, also the Erasmus programme should contribute to this and be aimed in particular at disadvantaged groups. For this reason, the DiscoverEU activities module is primarily aimed at disadvantaged young people in order to make Europe tangible and visible for this group of people. Since it is not yet possible to foresee to what extent this new programme component can actually involve young people with fewer opportunities and to what extent the educational mandate of the programme can be fulfilled through DiscoverEU, a maximum of 10% of the funds proposed under Article 14(2)(b) will initially be made available. A first programming period may be used to test and develop this new measure and may be increased for the next programming period if DiscoverEU has proved to be inclusive and established itself as a component of the Education, Training, Youth and Sport programme. The funds proposed for DiscoverEU come from the youth section of the programme. Particularly in this programme area, a particularly high proportion of young people with fewer opportunities can be reached, as the interim evaluation has impressively shown. A significant increase in financial resources is particularly necessary at this point, as the number of applications submitted outweighs the funds available. To provide a new, less developed component with such extensive funds from this programme area cannot be justified considering the overarching framework of the Erasmus programme to become more inclusive.

**Article 18(5): Rules applicable to direct and indirect management**

5. To improve access to people with fewer opportunities and ensure the smooth implementation of the Programme, the Commission may adjust or may authorise the national agencies referred to in Article 23 to adjust, on the basis of objective criteria, the grants to support mobility actions of the Programme.

**Artikel 18 Absatz 5: Auf die direkte und die indirekte Mittelverwaltung anwendbare Vorschriften**

5. To improve access to people with fewer opportunities and ensure the smooth implementation of the Programme, the Commission ~~may~~ **shall** adjust or—~~may~~ authorise the national agencies referred to in Article 23 to adjust, on the basis of objective criteria, the grants to support mobility actions of the Programme.

**Reasoning:**

DiscoverEU activities under Article 8c of the proposed regulation will focus on young people

with fewer opportunities. In order to ensure this orientation on the part of the national agencies, the Commission should authorise them to adequately orient and fund the associated mobility measures. This is why the 'can' - 'should' - regulation must be turned into a 'shall' regulation in order to introduce disadvantaged groups to the programme on a sustainable basis.

Brüssel/ Berlin, 07.11.2018