

# 30 STAKEHOLDERS' PROPOSALS TO IMPROVE THE DRAFT REGULATION "ERASMUS FOR ALL"

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"Erasmus for All" is the new programme proposed by the European Commission on 23 November 2011 for education, training, youth and sport. The draft regulation is now being discussed at the European Parliament and Council. The coalition praises the proposed budget of 19 billion EUR while acknowledging that it is a minimum allocation necessary to have a real impact in the current economic crisis and to match the ambitious targets of the Europe 2020 strategy. It also welcomes the commitment to simplify the programme. However it considers that some adjustments could be brought to the proposed Regulation in order to ensure a greater impact and European added value. This concerns the need to reinforce the lifelong learning dimension and the recognition of key and transversal competences and skills gained through non-formal education, to strengthen the complementary aims of learning – active citizenship, social inclusion and employability as equally important. Furthermore, it is crucial to better acknowledge the importance of civil dialogue and civil society and the support to them. The coalition invites EU institutions to take into account the arguments that underlie each of these statements. It also presents very concrete proposals in order to simplify the management and administration of the future programme.

## Key Messages

*As developed in this position paper*

### **PART 1: CONTRIBUTIONS ON THE GENERAL APPROACH & STRUCTURE**

1. Why we should reinforce the lifelong learning approach and how to do it
2. Why we should reinforce the social dimension and how to do it
3. Why we should reinforce active citizenship and how to do it
4. Why we should reinforce civil dialogue and how to do it
5. Management and simplification

### **PART 2 – ADMINISTRATIVE AND MANAGEMENT SIMPLIFICATIONS**

1. Simplifying application procedures in 4 steps
2. Simplifying the financial management of projects
3. Ensuring the sustainability of EU projects and networks
4. Guiding principles for authorising officers
5. Specific rules for operating grants

## PART 1: CONTRIBUTIONS ON THE GENERAL APPROACH & STRUCTURE

### 1. Why we should reinforce the lifelong learning approach and how to do it

The coalition welcomes the idea to have a programme that supports a lifelong approach to learning but we consider that the proposed Regulation is insufficiently reflecting this approach in terms of opening the programme to all type of learners from early childhood to seniors. It also observes a lack of coherence especially on indicators and definitions. Lifelong learning is a continuum that the programme should reflect with a genuine integrated approach. We can only achieve this if all the sectors are covered and their actors encouraged to work together.

- 1.1. **All sectors should be given equal importance.** EU programmes give a positive impulse and are complementary to the work that is done at national, regional and local levels in all the sectors – secondary and higher education, vocational education and training, non-formal education and adult education. All the target groups from the current programmes should have adequate opportunities to continue to receive EU support. For instance, the transnational mobility of primary and secondary students, of adult learners should be promoted together with that of higher education and vocational training students and of young people involved in non-formal activities (article 7.1(a)). Clear mechanisms that will guarantee this equal access, for example by planning to allocate a certain proportion of funding to the various target groups, should be mentioned in the Regulation itself. It will ensure that small organisations – which are primarily found in the school, youth work and adult education fields – have opportunities to participate alongside bigger institutions. Appropriate indicators should also be defined for each target groups (article 5). Finally, internationalisation should concern all the sectors (article 8) and not only higher education. Furthermore, the **structure needs to be clarified in order to ensure that the programme is tailor-made for each learner group.** This means that the three types of actions (article 6) be implemented in a way that is relevant to each target group.
- 1.2. **We call for a clearer recognition of non-formal education.** We regret that this sector is not mentioned in the scope of the programme (article 1) or in the Communication that accompanies the Regulation whereas it plays an important role, including in the outreach to disadvantaged groups. Today more and more learning takes place in non-formal or informal settings. Civil society organisations that provide quality non-formal education, notably youth organisations, should thus be supported at national and European level. It is also important to recognise and validate these learning outcomes. Furthermore; we ask for a clarification in the use of “non-formal learning” when in fact it should refer to the “non-formal education” sector (notably in article 2 Definitions).
- 1.3. **Cooperation for innovation and good practices should aim towards common goals.** We feel it is important to look at remaining barriers within educational systems to encourage more flexible lifelong learning pathways. The Regulation focuses too much on partnerships between the education and business worlds. Furthermore it creates a distinction between higher education and VET (article 8 b). We recommend that the goals of partnerships be focused on modernising education and training systems, on capacity building for organisations from all sectors and on learners’ personal development, active citizenship and social inclusion. Applicants should be encouraged to build projects with various types of actors: educational institutions, civil society organisations, social partners and local authorities. Indeed the format of these partnerships should depend on the challenges identified and on learners’ needs. As the High Level Group on Lifelong Learning<sup>1</sup> concluded: *“lifelong learning can only succeed if (these) parties work towards common goals and complement each other. Therefore, cooperation, consultation, consensus building and fruitful partnership are crucial.”* This is even more important if we really want to achieve an integrated approach. **In the same way, the aims of learning mobility should be clarified** (article 7). More emphasize should be given to personal development, social inclusion and active citizenship and a specific mention to intercultural learning and to language teaching

<sup>1</sup> High Level Expert Group, “Analysis of critical factors for the implementation of Lifelong Learning strategies and policies”, 2010

should be made.

- 1.4. **Most of our networks feel that the denomination “Erasmus for All” is not appropriate.** For many people it refers to higher education and students’ mobility whereas lifelong learning covers formal, non-formal and informal learning. We are concerned that, by using a brand name which is so strongly affiliated to a specific programme, it could lead to misconceptions and end up being misleading for the general public. Furthermore it goes against the EU priority to raise awareness on lifelong learning – and we know a funding programme is a great leverage to do so. “Lifelong Learning” or “Learning Europe” might be more appropriate brand names and would allow continuity with the current programme that has proved to be successful; many actors in Europe know the name already.

## 2. Why we should reinforce the social dimension and how to do it

The programmes should be for all learners (from early childhood to seniors), regardless of their social, economic 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. This is even more important in the current economic context. Indeed, getting more people skilled and educated requires specific efforts to reach out disadvantaged groups.

- 2.1. **The introduction should mention EU policy commitments as regards social inclusion.** We would like to remind the Council Conclusions of 11 May 2010 in which Member States *“Endeavour to make active use of each strand of the lifelong learning programme and, where appropriate, of the European Social Fund, of the European Regional Development Fund and of the Progress programme, in order to strengthen social inclusion through education and training, and maintain a strong focus on this dimension in the proposals for the next generation of programmes”*. This goal should appear clearly in the Regulation and be a strong element in making choices in the users’ guide and in defining impact assessment indicators.
- 2.2. **EU institutions should take into consideration individual, organisational and systemic impact** (article 3). Focusing too much on the systemic level can have an adverse effect and impede a broader participation. Indeed, if we want to reach out disadvantaged groups we need to support smaller, local organisations, that can be very effective in achieving capillary results and provide a more direct link between Europe and its citizens, thereby bringing about greater social cohesion. We thus strongly encourage the EU institutions to find a balance between big projects with systemic impact and smaller projects that have greater qualitative individual, organisational and societal impacts. In that respect it is important to recognise the role played by civil society organisations as agents of social change and innovation. **Support should be given not only to activities with clearly measurable short-term effects but also to those that promote general, long-term development.** The programme should support actions whose impact is either difficult to grasp or can only be quantified in the long term and whose value is shown by other evidence. This is particularly true for projects that aim at social inclusion and active citizenship or for projects that aim at improving learning methods in schools or quality of non-formal education programmes for young people for example.
- 2.3. **Targets should not only be quantitative.** Indeed giving very small grants for learning mobility may induce good results in terms of numbers but will not allow involving those who would not have gone through a learning mobility otherwise. Learning mobility should be accessible by all EU citizens regardless of their social background. National Agencies should be encouraged to introduce social criteria in the allocation of grants for individual learning mobility. Furthermore, we believe that loans should not replace grants. Although we understand that the aim of the proposed student loan guarantee scheme is to increase mobility, we see it as a very unwelcomed break with the European tradition of offering grants, which has proved successful because it covers the additional costs which often prevent students from going abroad to study. The regulations of the loan scheme are not defined yet and we urge the Commission to make sure that the best conditions are offered to the students and that the loans do not replace, especially in the future, the grant system as it

exists in the current programme. We should also look at other existing barriers. For instance, the possibility for students to combine at the same time a mobility period for studies and part-time work placements could favour students with disadvantaged backgrounds. It is also crucial to develop foreign language and intercultural education programmes as a preparation to mobility.

### 3. Why we should reinforce active citizenship and how to do it

The aim of the programme should be to support a holistic approach to learning, providing means to develop competences throughout life. Member states stressed in the EYC Council conclusions of 6 November 2009 that “*A solid foundation of key competences for both young people and adults, together with comprehensive lifelong learning opportunities – including enhanced possibilities for learning mobility – are crucial to promoting adaptability and innovation.*” This is a key to modernising our systems according to 21<sup>st</sup> century reality where learning takes place in formal, non-formal and informal settings.

- 3.1. **The Regulation is too much focused on improving people’s employability/skills.** The main aim of the programme should be to empower active and responsible citizens by providing them with opportunities to acquire and develop skills (including soft skills) throughout life and offer tools and motivation to fully participate in and contribute to society in all its dimensions – civic, social, cultural and economic. We would like to remind the Memorandum on Lifelong Learning that recognised that “*People themselves are the leading actors of knowledge societies. It is the human capacity to create and use knowledge effectively and intelligently, on a continually changing basis, that counts most. To develop this capacity to the full, people need to want and to be able to take their lives into their own hands – to become, in short, active citizens. Education and training throughout life is the best way for everyone to meet the challenge of change*”. We believe that the focus on active citizenship should be further underlined and reflected in the proposal.
- 3.2. **Acquiring and improving key and transversal competences encompass developing active citizenship and social cohesion as well as employability.** While the economic imperatives cannot be neglected, several limitations exist when it comes to a purely employment oriented vision of learning. We would like to remind the conclusions of the High Level Expert Group on “Critical factors for implementation of Lifelong Learning Strategies and Policies” that state that “*Learning has an important emancipating aspect, benefits of which go far beyond the economic performance<sup>2</sup>...*”
- 3.3. **Education to European citizenship should be a strong element in the Regulation.** We observe a decreasing sense of belonging to Europe and a very low level of confidence that people have in the EU. According to a recent Eurobarometer survey, just 43% of people questioned stated that they knew about what it meant to be a European citizen and 32% considered they were well or very well informed of their rights as citizens<sup>3</sup>. Education and training has a very special role to play in that respect.
- 3.4. Many **European networks and platforms** are very active in translating, disseminating and involving educational actors in EU policy-debates and projects and initiating a multipliers’ effect within the broader society. Their role is crucial and cannot be undermined notably by cutting the operational support to them.


### 4. Why we should reinforce civil dialogue and how to do it

Barely 30% of citizens think that they can personally influence the EU process and this figure is

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<sup>2</sup> *The subjective, social and economic importance and relevance of learning do not necessarily go hand in hand. Some learning is highly significant from the point of view of people’s personal and social situations and evolutions without being particularly relevant for the labour market and vice-versa, some labour market related learning will not change much from an individual or social point of view”*

<sup>3</sup> Flash Eurobarometer 294, October 2010



falling<sup>4</sup>. EU programmes should contribute to involve citizens' in policy-debates about the EU. "Every citizen shall have the right to participate in the democratic life of the Union" as stated in Article 10 of the Lisbon Treaty. In that context, we would like to outline the **specific role of European civil society organisations** that are currently supported by Jean Monnet and Youth in Action **and that of multi-sector platforms**. They aim to create a sense of European belonging among their members and ownership on EU policies and act as a voice to the concerns and needs of millions of citizens to the EU. They play a crucial role as intermediaries and multipliers in informing and involving education, training and youth actors in EU cooperation and policy-making and in implementing cooperation outputs. They can reach a critical mass and ensure a long-term impact. EUCIS-LLL has conducted a survey<sup>5</sup> that shows that 68,8% of educational actors at national level get information on the Education and Training Work Programme 2020 from their European networks.


- 4.1. **In order to perform their task these organisations need to receive a sustainable support from the EU.** Organised at EU level, most of them do not qualify for support from the national level. In the current Lifelong Learning Programme and Youth in Action these organisations can benefit from operating grants under a highly selective process and strict financial and reporting rules. There is no such mention in the current "Erasmus for All" Regulation. In order to facilitate the implementation of EU policies and programmes, the set up of a community of interests with mutual comprehension is essential. These actors have a real European added value in not only contributing bridging the gap between the EU and its citizens, but also the gaps between citizens from different Member States. Without them it is unlikely that individual organisations and actors will get involved in discussing, contributing and implementing EU orientations and projects in education and training. This specific recognition and support – via operating grants for European organisations in education, training and youth – should be mentioned in the "Erasmus for All" Regulation.
- 4.2. **Operating grants have the added value of supporting the functioning of these networks and platforms in a more sustainable way than with projects.** European networks do much more than "projects". European networks already run projects but thanks to the operating grants they can, amongst others, continue to disseminate their results. They can also follow and contribute to EU policies and challenges on a long-term perspective and connect them to the realities at the grass root level. They play a role in the dialogue that takes place between the EU and civil society (Article 9 (c)). These organisations thus allow supporting cooperation "*aiming at long term systemic impact*" (article 3). If they have to run several projects at the same time (instead of receiving an operational grant as announced by the European Commission), their functioning will be much less cost-effective and sustainable. This has a very negative impact on their staff (precarious contracts), on the quality and sustainability of outputs, and thus, on return on investment. We call for EU institutions to state in the Regulation the specific support to these European networks. The amendment could be "*operating grants to Union-level civil society organisations working in the field of education, training and youth whose activities relate and contribute to the objectives of the Programme.*" We are ready to work with the European Commission to define financial and administrative rules that will ensure an efficient use of funds, their impact assessment but also the user-friendliness and cost-efficiency of these operational grants.
- 4.3. **Article 9 should further make a reference to a structured dialogue in education and training and to European platforms and Forums that make it happen.** EUCIS-LLL, the European Civil Society Platform on Lifelong Learning, as been recognised by the European Commission as being "*in a unique position to support European networks in education and training to work collectively at European, national and local levels and to contribute to a structured policy dialogue within the open method of coordination in education and training*"<sup>6</sup>.

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<sup>4</sup> Standard Eurobarometer 75 / Spring 2011

<sup>5</sup> EUCIS-LLL survey on national consultation Forums and Platforms; it collected 293 respondents from Dec. 2011 to Jan. 2012. Results will be published in March 2012.

<sup>6</sup> In 2009, the European Commission acknowledged EUCIS-LLL as a "unique representation" platform of lifelong learning civil society organisations at a EU level. It has participated for many



It should be mentioned as a reference civil society partner. This dialogue should also support the activities and autonomy of, as well as the policy dialogue with, the European organisations which act as stakeholders in the area of education, training and youth and as intermediary between the European institutions and civil society.

- 4.4. **In the Regulation it is not clear whether European networks will have to apply to National Agencies or to the Executive Agency for funding.** In the Regulation it is only mentioned that the EACEA will manage some specific actions. This point is key because the Belgian National Agency would risk receiving an enormous quantity of applications from Brussels-based European networks<sup>7</sup> and might not have the adequate expertise and budget allocation to manage this specific kind of applications.

## 5. Management and simplification


We believe that alongside the need to match political priorities and programmes it is important to remove obstacles to participation. 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.

- 5.1. **An article should be added on stakeholders' consultation** stating that "*The Commission shall have a regular dialogue with the beneficiaries of the programme and relevant stakeholders and experts*" as in the Europe for Citizens programme Regulation (article 10). Learners and educators from the various fields of education and training should be involved to co-decide on issues and programmes targeting them. A solution could be to implement a co-management system in the governance of the programme. An advisory board could be set up to voice civil society recommendations in order to improve the management and implementation of the programmes on a regular basis. It could for instance monitor if the evaluation process is transparent, that all the sectors access the funds, the level of trans-sector partnerships, etc. Of course further reflection is needed on the modalities. In the meantime, the coalition expresses the strong will to help the European Commission in the preparation of user-friendly users' guide.
- 5.2. **Clarification on the role of national agencies.** 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 while taking in account the specific sectoral needs. It is important that, despite having a single national agency in each programme country, such agencies will be equipped with the appropriate expertise to evaluate a great variety of project types: a project presented by an higher education or research institution is very different from one presented from a youth organisation, for example.
- 5.3. **The selection process should be reviewed as it is now distant and dialogue is lacking.**

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years in a civil dialogue with the EU institutions. In the Commission's 2011 annual work programme on grants and contracts for the Lifelong Learning Programme, EUCIS-LLL is recognised to be "*in a unique position to support European networks in education and training to work collectively at European, national and local levels and to contribute to a structured policy dialogue within the open method of coordination in education and training*". EUCIS-LLL is also the representative of the education and training sector within the Liaison Group with organised civil society at the European Economic and Social Committee since 2004.

<sup>7</sup> In that respect, EUCIS-LLL advocates for a **European Status for European Associations** to allow their institutional recognition, as recommended by the conclusions of the European Economic and Social Committee's conference "A structured civil dialogue for a citizen-friendly European Union" (2010). It participates in a coalition of civil society organisations who led a successful campaign at the European Parliament to ask the European Commission to relaunch this dossier. [www.easea.eu](http://www.easea.eu)



More transparency is requested on the way applications are evaluated: quality feedback should be given to all applicants. Furthermore decision-making should be faster and more transparent (i.e. solving problems of late payment). **The final evaluation of projects should focus on evidence** (results). It is reported that auditing requirements represent a huge burden on the time and resources of civil society organisations and for the European Commission. 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.

- 5.4. **Alongside the administrative and financial simplification, it is crucial to improve guidance and information.** This can be done by using existing networks or by raising awareness on the programmes to a wider audience focused on those currently excluded (using ambassadors, community leaders or new IT tools).

## **PART 2 – ADMINISTRATIVE AND MANAGEMENT SIMPLIFICATIONS**

If we want the programme to target all EU citizens regardless of their social or geographic background, they should become user-friendly. Preparing 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 proposals<sup>8</sup> made by civil society organisations to simplify the administrative and financial burdens linked to EU programmes. Furthermore it is important to use “what works” in the current programmes for instance actions supported in the Youth in Action or Grundtvig programmes that proved to be easier to manage.

### 1. Simplifying application procedures in 4 steps

- 1.1. **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.
- 1.2. **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.
- 1.3. **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. This database could also serve as a portfolio of expertise and evidence about applicant organisations.
- 1.4. **Applying common rules.** National Agencies and the Executive agency should propose more flexible deadlines to ensure greater participation (i.e. the case of the Youth in Action where several deadlines are proposed every year). It should also 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 the programme.

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<sup>8</sup> 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.

## 2. Simplifying the financial management of projects in 4 points

- 2.1. **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. Furthermore, this creates inequalities across the countries as some applicants are asked to provide a bank guarantee by their national agencies while others don't. A solution could be for the EIB to provide such guarantees.
- 2.2. **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.
- 2.3. **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.
- 2.4. **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 (Financial Rules) 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.

## 3. Ensuring the sustainability of EU projects and networks

It is important to ensure the sustainability of good EU projects and networks outputs. Once a project is over, lack of continuity often hampers the sustainability of the results.


- 3.1. **Specific financial support to follow on with successful projects** (follow up on impact evaluation process). EU projects or networks that proved to be successful and that delivered transferable products should be able to apply for an additional support for their dissemination / implementation.
- 3.2. **Facilitating joint exchange ideas and processes on EU financial projects** on the same range of education/training areas. One meeting per year could be organised between project coordinators in order to allow cross-fertilisation of ideas and avoid "re-inventing" the wheel. A pool of European conferences annually decided and defined could also be achieved by European projects coordinators.
- 3.3. **Set-up an online platform to facilitate knowledge exchange** for stakeholders and to provide direct/indirect support on sponsoring specially focused on communication and media dissemination (i.e. "Lifelong Learning Hub" proposed by EUCIS-LLL).
- 3.4. **It is important to strengthen the preparation and follow-up phases of learning mobility** in order to sustain the beneficial effects in the long run.

## 4. 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, authorizing 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.

- 4.1. **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.

- 4.2. **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 budget<sup>9</sup>. This limits the possibilities for some organisations to participate. The ratio for indirect costs should be at least between 15% and 20%.
- 4.3. **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 and aim towards improved outcomes.
- 4.4. **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.

## 5. Specific rules for operating grants

- 5.1. **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 on Volunteering 2011 and the European Year of Citizens 2013.
- 5.2. **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.
- 5.3. **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.
- 5.4. **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 they are implemented. It is important to provide clear guidelines to authorising officers.

We remain available for further information,

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<sup>9</sup> 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*” SOLIDAR policy briefing note, September 2010.

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