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STANDING COMMITTEE  
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**WORKING GROUP ON EDUCATION, TRAINING AND YOUTH**

**Proposals for Community Action Programmes in the field of  
Education, Training And Youth 2000 – 2004**

**Comments by the EFTA EEA States**

**I INTRODUCTION**

1. The EFTA EEA States participate in all the Community programmes in the field of education, training and youth under the EEA Agreement. The present programmes will run out at the end of 1999, and the Commission has presented proposals for three new programmes: SOCRATES II, LEONARDO DA VINCI II and YOUTH (combining Youth for Europe and European Voluntary Service). In accordance with the EEA Agreement, the EFTA EEA States will continue co-operation with the European Union in this field.

2. This document presents the comments of the EFTA EEA States to the Commission's proposals. The comments have been elaborated by the EFTA Working Group on Education, Training and Youth. First, there are some general remarks on European co-operation in the field of education, training and youth, on the Community activities in general and the common elements of the three proposals. This part of the comments is followed by more detailed comments to certain elements of each of the proposals.

**II GENERAL REMARKS**

3. The knowledge society makes new demands on education systems, on working life and on each individual. On-going internationalisation is also a challenge to the education and training policies of all countries. Against this background, **the EFTA EEA States welcome the proposals for new education, training and youth programmes** as important elements in the construction of a European educational space oriented towards the development of competencies, the enrichment of citizenship and the development of employability through the acquisition of knowledge.

4. The EFTA EEA States recognise that education and training are an essential dimension of employability. However, the main aim of education systems should be to enhance people's understanding of the world they live in and to create the conditions for the development of a culture of learning and a diversity of learning environments. Education is a key factor in the development of society. It is therefore important that it is inclusive and contributes to a sense of belonging, also among persons with special educational needs. Education adapted to the needs of persons with different abilities and interests is the best defence against exclusion.

5. The EFTA EEA States are in agreement with the **principle of subsidiarity** and the European added value of the co-operation. Activities anchored in the programmes should support and complete actions undertaken by participating countries.

6. The proposals carry forward the main elements of the current programmes. This is positive, as these programmes have been successful in most respects. The continuity also makes it easier for the users to recognise the activities. At the same time, and based on the acquired experience from the current programmes, the proposals seek to increase **integration, decentralisation, simplification and transparency**, thus giving the users easier access to information and making the application process less cumbersome.

7. It is clearly positive to give the participating countries more responsibility for the monitoring and financial supervision of the projects. A more **decentralised approach** will give increased room for national considerations, and open up for a greater degree of flexible solutions adapted to the needs of each country. Obviously, the decentralisation will increase the workload on the national structures, which should be compensated for by a transfer of general administrative funds from central to national level. However, the total administrative costs should not be increased at the expense of the programme activities.

8. In view of the criticism that has been made of the complicated and lengthy **application procedures** and delays in the payments of grants, there is clearly a need for improvements and simplifications in these areas. In addition, simplification of renewal and reporting procedures would be most welcome. An effort should also be made to minimise the time between the submission of the interim reports and the payments.

9. The continued and even increased emphasis on **mobility** in the new proposals meets in general with the EFTA EEA States' approval. It underlines the success of the mobility actions under the current programmes. With regard to "**virtual mobility**", the EFTA EEA States also welcome the emphasis on the use of new information technology both in education generally and as a tool to facilitate the co-operation within the programmes.

10. The EFTA EEA States would like to emphasise the importance of **language learning** for the European co-operation in education, training and youth. The maintenance of a separate action in this area within the SOCRATES programme is appreciated, but language learning may also be given more attention in the other two programmes.

11. The emphasis on **lifelong learning** is considered to be very important and one of the avenues towards greater flexibility. The EFTA EEA States would like to stress the importance of lifelong learning as a horizontal element to be taken note of in all parts of the programmes.

12. In all three programmes, the idea of **joint calls** is introduced. Such joint actions are interesting and should be looked positively upon, being a contribution to the establishment of an integrated knowledge policy. However, as big projects often end up being co-ordinated by big countries, it is important that measures are taken to ensure a fair geographical participation in these actions.

13. The EFTA EEA States acknowledge the need for **complementarity and coherence with other Community actions**, especially the Fifth Framework Programme for research and development, but also activities in the areas of culture, audio-visual policy, the information society, SMEs, social policy and public health, to name but a few. However, the envisaged close link between vocational training and the European Social Fund may be a complicating factor for the participation of the EFTA EEA States. The EEA Agreement does not cover participation in the structural funds of the EU, and consequently, participants from the EFTA EEA States would not be eligible for funding from these funds. It is assumed that practical solutions will be found that ensure full and equal participation of the EFTA EEA States in the proposed programmes.

14. The programmes are proposed to cover a five-year period. In the view of the EFTA EEA States, it would have been better to have a **duration of seven years**, covering the period from 2000 to 2006. This would give project promoters and interested parties more time to get familiar with the different actions and would allow an even better consolidation of the programmes.

15. The proposed establishment of "**European Knowledge Centres**" is not altogether unproblematic. While it is desirable to step up co-operation at regional and local level, in order to bring the programme closer to the people, and also closer to the Leonardo and Youth programmes locally, the creation of new centres may constitute a complicating factor, particularly in small countries. The proposal also gives very little information about the financial and administrative aspects of these centres. It should be left to the national authorities of each country to decide on the best methods and structures for bringing co-ordinated information about the programmes "closer to the people".

16. The **extension of the co-operation** to countries in Central and Eastern Europe, as well as to other countries and regions, enriches the concept of the European dimension of the programme activities. The EFTA EEA States will take an active part in the possibilities that follow from the opening of the programmes, and would like to see the possibilities extended to cover all types of mobility between new participating countries and the EFTA EEA States.

17. However, it should be pointed out that the proposed decisions have an **unclear reference to the participation of the EFTA EEA States**. It would be preferable with a specific reference to the EEA Agreement, and the following “whereas-clause” may be suggested:

*“Whereas the conditions governing the participation from the EFTA EEA States are laid down in the EEA Agreement;”*

18. In the same way, a sentence may be inserted in the Article of the decision referring to participation of non-member states along the following lines:

*“This programme is open to the participation of the EFTA States parties to the EEA Agreement, according to the terms and conditions laid down in this Agreement.”*

### III COMMENTS ON THE PROPOSAL ON SOCRATES II

19. SOCRATES II ensures the continuation of successful activities within school and higher education, adult and distance education. The EFTA EEA States welcome the fact that the proposal is based both on Article 126 and Article 127, thus making co-operation easier between general education and vocational training. This also gives the **social partners** the possibility to participate in SOCRATES II, something that is very valuable.

20. The **simplification** of the structure and of application and selection procedures, as well as the reduction in the number of objectives is most welcome, as is the decentralisation of individual mobility to the integrated management structures.

21. With regard to the **budgetary resources**, the overall budget for the programme is small in relation to the number and types of activities, the target populations and the number of countries involved. The expected impact of SOCRATES II on national education systems and on the European educational area will therefore be limited.

22. A positive aspect is that possible **connections between the various levels of education** become more visible. An example is the link between teacher training networks in the Comenius action and the Thematic Networks of Erasmus. However, the practical implications and modes of implementation would require some clarification.

23. Within **Comenius**, the focus on **multimedia** and on the creation of **multilateral partnerships** meet with our support. Our experience shows that the active participation of parents is very often important for the successful outcome of school projects, and we therefore approve of the formal possibility for involvement of parents in this part of the programme, as well as the involvement of business and industry.

24. As regards the proposed **Action 1.1.2**, “Plan for inter-school co-operation in Europe”, this may prove a discouragement and an unnecessary obstacle. The higher education institutions have had difficulties with the European Policy Statement, and it has to be born in mind that schools on the whole are poorly equipped administratively and that each school will probably receive modest sums. Therefore, the plan seems not to be feasible.

25. The EFTA EEA States welcome the **opening for partnerships aimed at promoting languages** within **Action 1.1** of Comenius. However, the fact that these partnerships may only in exceptional circumstances be bilateral could become a hindrance for the implementation of the activity.

26. Concerning **Action 1.1.3**, it is unclear to what extent and at what time or stage of a partnership the pupils can participate in mobility activities. It is also unclear what is meant by “limited number of pupils” in 1.1.3.a. Compared to the current Lingua E, where a whole class can participate in exchanges, this proposal seems to be less interesting for the schools. The selection of pupils could also become a problem.

27. It is noted that Comenius **Action 1.1.3 c** concerns the educational needs of the children of migrant workers, travellers, gypsies and itinerant workers. However, the category under the present Socrates programme for **promotion of inter-cultural dimension in schooling** was quite interesting, and should also be continued as a separate centralised action.

28. In the action concerning **school staff (Action 1.2)**, the regrouping of all individual mobility in one point constitutes a needed simplification compared to the present phase of the programme. The strong focus on multimedia may, however, exclude teachers in schools with limited access to new technologies.

29. In Erasmus, the proposal maintains the **structure** of the present programme in the sense that a centralised Action 1 has a bearing on the content of a decentralised Action 2, Erasmus. However, it is not clear whether participation in **thematic networks** will be included in applications for institutional contracts. In our view, if the co-ordination of projects from all the different actions of the programme within the framework of the institutional contract will lead to a distribution of funds for all projects, like the one in force for the institutional contract today, there could be a decline in interest for some of the activities concerned.

30. Some EFTA EEA States would also like to see the “**free mover clause**” implemented into Action 2. Although the Commission encourages the issuing of institutional contracts with higher education institutions, mobility of “Erasmus free movers” should not be discriminated against. Otherwise, students from smaller higher education institutions with a smaller European network would be excluded from the programme.

31. The proposed decentralisation of Erasmus, as well as the greater responsibility for each country to ensure improved complementarity with other national initiatives, can only become a reality if the **rules and regulations concerning the allocation of EU funding become more flexible**. They should allow for differences in financial and

other structures in the various participating countries. In addition, there are even more possibilities for decentralisation, for instance by making the integrated management structures responsible for the parts of the institutional contract applications concerning the organisation of student and teacher mobility, as these constitute the basis and framework for the distribution of individual mobility grants.

32. Regarding **Action 2.1.2, the compulsory character** of the use of multimedia in all activities of inter-university co-operation under the institutional contract seems somewhat exaggerated. Multimedia should be used “wherever relevant” rather than “wherever possible”.

33. The proposed **Action 3, Grundtvig**, is much more interesting than the adult education activities in the present SOCRATES programme. The EFTA EEA States are looking forward to greater possibilities for participation in European co-operation for the “folk high schools” (the true Grundtvig schools), study associations and other non-governmental organisations involved in adult and alternative education and training. The view that people with very little formal education may need and wish to have accreditation for competencies acquired also outside the formal school system is shared by the EFTA EEA States.

34. However, the strong focus of **Action 3** on groups that for various reasons have insufficient basic training, is too limited compared to the multitude of life-long learning methods and activities that are being developed throughout Europe. The **action should be broadened** somewhat in order not to lose out on a number of the most innovative developments in education. There should be no age limits, and persons with all kinds of background should be allowed to participate in this action.

35. As regards **Action 4, Lingua**, the EFTA EEA States assume that Icelandic and Norwegian will continue to be eligible languages, as they are in the present Socrates programme. The EFTA EEA States support the special attention given to the teaching of the least widely used and taught languages of the Community. Furthermore, it is suggested that “the development of multimedia programmes for language learning” be included in the list of projects and activities for which Community financial support may be given.

36. The EFTA EEA States find it useful to **maintain a separate action for multimedia through Action 5, Atlas**. However, there should be measures for improved co-ordination with comparable activities under LEONARDO DA VINCI in this part of the programme.

37. The present SOCRATES programme has a separate chapter on the exchange of information on the diverse systems and policies of education in the participating countries within ARION, EURYDICE and NARIC. The EFTA EEA countries have participated in these activities with great interest and are pleased to see that the activities are continued through Action 6 of the proposed programme.

#### IV COMMENTS ON THE PROPOSAL ON LEONARDO DA VINCI II

38. The **simplification and more focused approach** of the proposal, compared to the present programme, are most welcome. The EFTA EEA States acknowledge the reduction of objectives to three, but would caution against too strong a focus on employment. The programme should have as its main objective to develop and strengthen vocational education and training in Europe.

39. The EFTA EEA States would especially like to underline the importance of encouraging the **social partners**, both organisations and firms, to participate in the programme. It is valuable that small and medium-sized enterprises can apply for a grant to make it possible for them to accept young persons for training purposes.

40. It is also a positive feature that there are only proposed **six measures**. The simplification should also encompass the implementation and monitoring of projects, not just the planning and application phase. This would in particular facilitate the participation of small and medium-sized enterprises.

41. The objective of devolving **more responsibility to the participating countries** for management of activities and measures is in general a positive one. Participating countries could also be given more responsibility for monitoring and control of projects. However, the decentralisation requires that the responsible national institutions be granted **adequate financial resources**. The amount proposed for this in the proposal does not seem to be sufficient to ensure this.

42. The proposal places increased emphasis on measures dealing with **mobility**. The EFTA EEA States are not comfortable with the fact **that increased funds towards mobility seem to be allocated at the expense of networks and dissemination**. The balance between mobility measures and pilot projects at a national level also gives reason for concern. Experience shows that a minimum number of pilot projects must be established in a country for this part of the programme to be efficient and maintain credibility among the actors.

43. The EFTA EEA States **are not in favour of the proposal for fewer and larger pilot projects**. This will make it more difficult for small firms and institutions to manage and participate in the pilot projects. It also seems evident that smaller nations will be granted fewer projects, which might discourage potential operators from embarking on the complicated application process. In addition there may be negative influences on the quality of the projects and on the composition of the partnerships.

44. There is clearly a need to stimulate **innovation and development** in vocational education and training in Europe. The proposal to fully fund a relatively large number of centrally selected demonstration actions will not be an adequate response to the needs and ideas for development among all the different players in vocational training. It is therefore proposed that part of the **financial resources proposed for the demonstration actions are reallocated to increase the number of pilot projects**. Such a shift will stimulate ideas and development of vocational training among a considerably larger target group.

45. It seems that **common European deadlines** for application for transnational projects are not envisaged. Consequently, the timing of the project development process will differ between the participating countries. This can be a serious hindrance to establishing transnational partnerships of adequate quality. Such deadlines should therefore be introduced.

46. With regard to **virtual mobility actions**, there is a need to focus on pedagogical processes, methods and organisation. Such products and processes are not mentioned along with the technical products in the Financial Statement, and it is suggested that the methodological aspects be more clearly spelled out.

47. **Second chance training activities** are put forward as one of the demonstration actions. The EFTA EEA States are pleased that the term “second chance schools” has been altered to “second chance training arrangements”, as this may broaden the programme’s approach to alternative training arrangements and organisers. The term could even be changed to “second chance or alternative training arrangements”, to reinforce this tendency.

48. **Networking at a European level** is considered important, and in order to develop expertise and innovatory approaches through networks, funding is required. However, the objectives, functioning and roles of the community networks are not clearly enough described to be launched as an independent measure.

## V COMMENTS ON THE PROPOSAL ON YOUTH

49. The EFTA EEA States welcome the **continuation and integration of the two current programmes Youth for Europe and European Voluntary Service** into the new programme **YOUTH**. The Youth for Europe programme has given considerable contributions to the mobility of youth groups in Europe, and the programme has proved to be a success and to a large extent, it has met the needs and expectations of young people, being a valuable contribution to informal and non-formal education. The **European Voluntary Service** for young people opens new possibilities for young people on an individual basis to gain practical experience by participation as volunteers in the local community in other countries. Even if the pilot period has been short, and there are still problems and obstacles to be solved, the continuation of the programme is of great value. In general, there are still improvements to be made in the implementation of the various actions in the youth field, in order to give youth from all the 18 countries participating in the EEA the same possibilities.

50. In the proposed new programme, the EFTA EEA States would like to see the **main emphasis and priority given to youth exchange**. The main part of the financial resources should be allocated to the action Youth for Europe.

51. The intention to make the new programme **more accessible** to young people is welcomed, as is the intention of **simplifying the procedures**. Experience shows that considerable improvements may be made in this respect, and that one avoids a situation where complicated application forms and administrative procedures become an obstacle to the possibilities for young people to benefit from the programme.

52. As the new programme foresees a more **active counselling and follow-up of the participants, it is important to strengthen the national structures**. It is expected that the Commission will take a larger responsibility for the financing of the national agencies.

53. With regard to **Action 1, European Voluntary Service**, there is a need to gain more experience from the pilot period and the two-year programme in developing implementation measures. The programme proposal should also put emphasis on the solution of legal problems linked to the implementation of the action, like work permits, the taxation of pocket money and social security rights.

54. The activity on **voluntary service in third countries** should also open up for the possibility for young people from these countries to do voluntary service in the EU Member States and the EFTA EEA countries.

55. Counselling and follow-up of the volunteers, both during their service and afterwards, must be secured through qualified training of staff members and contact persons at national level.

56. Concerning **Action 2, Youth for Europe**, the **age limit** proposed for participation in the actions may prove to be a problem. Youth groups are not homogenous as far as the age of the participants is concerned, and some young people belonging to a youth group might be excluded from participation because they don't have the required age. It is therefore suggested that the age limit be practised with flexibility in order to allow for the participation of young people under the age of 15 in an exchange group.

57. The idea of including **sports** as a possible part of the co-operation under the youth programme is interesting. However, it is necessary to look more closely into the premise for this before the proposal is put into action. It should be underlined that sports activities should be seen as a measure aimed at fostering tolerance and integration.

58. The EFTA EEA States agree that more focus should be placed on **multilateral exchanges**, and that bilateral exchanges only should be exceptions used for special groups after the first two-year period. The EFTA EEA States would like to underline the necessity to have the same possibilities as the Member States in exchange projects with third countries.

59. In the view of the EFTA EEA States, **Action 3, Opportunity for Youth**, should be decentralised, although the need for a European dimension in the projects should be underlined. It is necessary to have knowledge of the national or regional situation in the participating countries in order to be able to make correct justifications and follow-up to these types of activities. There should also be a balance between projects initiated by young people who have finalised their voluntary service, and young people and youth groups with a local background.

60. The EFTA EEA States are positive to the possibilities for initiating **joint actions** covering the objectives of two or three of the education, training and youth programmes. However, this should be approached with some caution, as it is very important that the youth activities keep their informal character and that the division between these informal youth activities and the more formal education and training activities be kept.

61. As regards **Action 5, Accompanying measures**, the EFTA EEA States will underline the importance of continuing support to projects for training of youth leaders and youth workers, co-operation between structures and networks involved in youth work, the development of youth policy, regional co-operation and exchange of good experiences. The importance of support to projects aiming at information for young people should also be underlined.

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