



Department
for Education

Consultation Response Form

Consultation closing date: 30 June 2014
Your comments must reach us by that date

REVIEW OF THE BALANCE OF COMPETENCES

CALL FOR EVIDENCE ON THE GOVERNMENT'S REVIEW OF THE BALANCE OF COMPETENCES BETWEEN THE UNITED KINGDOM AND THE EUROPEAN UNION

EDUCATION, VOCATIONAL TRAINING AND YOUTH

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Reason for confidentiality:	

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Please tick if you are responding on behalf of your organisation.	X
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If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Ministerial and Public Communications Division by e-mail: consultation.unit@education.gsi.gov.uk or by telephone: 0370 000 2288 or via the Department's '[Contact Us](#)' page.

EDUCATION AND TRAINING QUESTIONS

Context

The British Council is the United Kingdom's international organisation for cultural relations and educational opportunities, and is also the host organisation for the UK National Agency for Erasmus+. The British Council therefore works closely with the EU institutions and programmes in the area of education and training. We take an active interest in the EU's level of competence in this area and are delighted to have the opportunity to input to this timely review.

Key principles

The British Council strongly supports the European Union's motto 'United in Diversity' which foregrounds the importance of national and local cultural diversity. Indeed, we believe that the combination of shared values, free trade and movement of people, and importantly the distinctiveness of individual national cultures are the real strength of the European Union. Each of the EU member states has its own approach to education and training, and often, as in the case of the UK, the approach is further differentiated as it is devolved to the distinct regions or nations that comprise the member state. While we agree that the European Union should have a supporting competence in this area, it would be unnecessary and counterproductive for this to be extended.

In addition, the British Council firmly believes in the principle of subsidiarity and that in terms of education and training policy, this requires that primary responsibility should remain at national, devolved and local level rather than European level. However, the British Council does believe that there is a valuable role that the EU can play in supporting co-operation and exchange in education and training and that it performs this effectively via its current programmes. We would therefore not wish to see any specific extension or repatriation of powers from the EU at the present time.

General Issues

1 Does EU action, as opposed to national government action, in the areas of education and vocational training generally benefit or disadvantage the UK? Can you point us to any published evidence or analysis in support of your view?

EU action, as opposed to national government action, in the areas of education and training simplifies multilateral cooperation between actors in the member states, and provides financial and organisational support for wider collaboration, which is greatly to the advantage of the UK. For any national government to attempt to achieve the same effect would require substantial investment of resources in coordination and direct funding of collaborative activities, and it is very unlikely that the current benefits could be achieved without the overarching co-ordination mechanisms provided through the EU.

The continuing pressure on public funding for education and training collaboration is likely to lead to increased interest in EU funding sources in the coming years. There is increasing linking between strands of EU activity, for instance, Horizon 2020 and social impact and skills for employability. UK research active academic staff in particular are looking towards the other member states of the EU as a source of talented near bilingual students and research funding. The linkages created between European Universities by staff and student exchanges are key to this process.

Three specific examples of effective EU actions with significant benefit for the UK are:

- the Lifelong Learning Programme 2007-2013 (LLP) which provided over £600m for the higher education, vocational education, schools education and adult education sectors in the UK;
- the Youth in Action Programme 2007-2013 (YiA) which is covered in the Youth section (paras 16ff) but also relates to learning, in an informal and non-formal context, for the youth sector in the UK;
- the Erasmus+ programme 2014-2020, the EU's integrated programme for international learning in education and training, youth and sport which will provide over £840m for the higher education, vocational education, schools education, adult education and youth sectors in the UK.

The following comments are based on the British Council's experience in implementing EU programmes in education and training, including the 3 programmes named above, for over 20 years. This includes responsibility for managing the eTwinning platform and programme for school partnership linking and teacher professional development. Since January 2014 this also includes responsibility – in partnership with Ecorys UK Ltd. – for the implementation of the current large-scale programme Erasmus+.

Our experience gives repeated evidence of the positive impact of EU programmes on learning by individuals, and improvement in the opportunities offered to learners by organisations. There is wide-ranging evidence from across UK formal and non-formal education that individuals benefit from learning collaboratively with counterparts in other countries – that schools, colleges, universities and youth groups are able to develop their staff capacity, and that curricula and other enabling frameworks are enriched by access to new sources of good practice and innovation. EU programmes in education and training have a very significant role in addressing one of the most pressing policy challenges: how to enable people to gain the skills and experience

they need to prosper in a global economy, and to contribute responsibly to society.

The scale of resources available to the UK through such programmes should also be noted. In 2013, the final year of the Lifelong Learning and Youth in Action programmes (precursors to the Erasmus+ programme), over 20,000 separate projects were successfully submitted by UK organisations, securing EU grant funding totalling €105 million.

EU activity provides a valuable mechanism for cooperation and exchange between participating countries. The following initiatives have improved the consistency and overall quality of education and training in Europe:

- **European Qualifications Framework** (see for example: http://ec.europa.eu/eqf/compare/uk-eni_en.htm#comparison)
The development of a qualifications framework allows national systems to be effectively referenced and cross-referenced to other national systems, which is an essential support for the mobility of students and employees. The EU's work in this area is undertaken in cooperation with NARIC offices and National Agencies.
- **European Credit Transfer and Accumulation System (ECTS)**. ECTS helps make higher education comparable across Europe, facilitating the recognition of studies and allowing for the transfer of learning experiences between different institutions. ECTS is fundamental in the support of effective academic recognition as a part of student mobility. It arose from the need for such recognition as a consequence of the scale of Erasmus, and the need the programme had for formal structures to support its growth.
See: http://ec.europa.eu/education/tools/ects_en.htm
- **European Credits in Vocational Education and Training (ECVET)**. ECVET supports the validation and recognition of work-related skills and knowledge acquired in different countries and systems. This increases the compatibility of European VET systems and supports learner and employee mobility between different countries and learning environments.
See: http://ec.europa.eu/education/policy/vocational-policy/ecvet_en.htm
- **European Quality Assurance Reference Framework for VET (EQAVET; previously EQARF)**. EQAVET is a voluntary system that helps EU countries promote and monitor the continuous improvement of their vocational education and training systems on the basis of commonly agreed references. It also makes it easier for skills and competencies acquired by learners in different countries and learning environments to be accepted and recognised abroad.
See: http://ec.europa.eu/education/policy/vocational-policy/eqavet_en.htm

2 Are there any specific EU activities in the areas of education and training that you consider particularly beneficial or particularly disadvantageous to the UK?

Comments:

In **higher education**, the benefits arising from the ability of UK institutions to participate in Erasmus are felt by students, staff, the institutions themselves and the wider UK economy. Benefits for students include increased levels of academic attainment (HEFCE's 2009 study demonstrated a significantly higher proportion of students who undertook an Erasmus mobility gained a first or upper second class degree, and had a higher salary in their first post), greater linguistic and inter-cultural awareness and fluency, the development of personal attributes – self-confidence, independence, adaptability – which enhance their employability, and enrichment of their wider experience of life. Benefits for staff include greater awareness of other approaches to pedagogy, opportunities to consider their discipline from another cultural perspective, and the development of a further dimension to their academic network. Benefits for institutions include the development of an important element in their internationalisation strategy, enhancement of the employability indicator in any relevant league tables or indices, reinforcement of their marketing strategy through an enriched student offer, the opportunity to develop further their 'internationalisation at home' strategy, an added diversity to classroom discussion and debate, and a further connection to the wider academic network.

In **higher education**, the UK also benefits in many of the ways referred to above from other EU education and training initiatives (now brought under the aegis of Erasmus+) such as Erasmus Mundus joint master degrees, Tempus, and the Erasmus centralised actions. These are especially beneficial at institutional level, in terms of providing funding, raising profile, and enhancing the potential for academic cooperation by UK institutions. Further detail is available in the interim report on Erasmus Mundus undertaken for the EACEA.

In **higher education**, the EU's mobility and cooperation programmes – in particular Erasmus - have brought benefits in their coordination and scale to a very large number of students and staff of institutions in the UK (more than 230,000 students since 1987). They have enabled a generation of students who might otherwise not have considered spending a period of time studying or working abroad to do so.

We regard other European countries as a key destination in relation to the UK Outward Mobility strategy and one with potentially fewer cultural and linguistic barriers in comparison with other destinations for UK students.

In **higher education**, the scale and familiarity of the EU student mobility programmes, in particular, is worthy of note. UK students have traditionally been

slow to take up opportunities for mobility, and Erasmus has maintained a critical momentum of interest and opportunity for UK universities. It continues to represent, we believe, about two thirds of outgoing UK student credit mobility. The new education and training programme, Erasmus+, will offer still more opportunities for participation, and introduces a new international dimension of opportunity for students and staff. We believe this to be especially relevant at a time when higher education is becoming a global enterprise, with institutions increasingly cooperating trans-nationally and indeed across continents.

The long term impact of mobility programmes is not to be overlooked. The alumni of UK institutions whether short term Undergraduates or postgraduates who have experienced three country mobility under the Mundus joint masters programmes create a large early career network that can have considerable influence on business and academic links in future.

Apart from the benefits to UK HE institutions of participation in Erasmus Mundus and Tempus, the 'centralised actions' of Erasmus (now represented by the strategic partnerships and knowledge alliances of Erasmus+) have been effective means of encouraging the development of academic networks, and of supporting cooperation with European partners in developing new approaches to pedagogy. They have also promoted the importance to the growth and development of higher education of cooperation with business.

Practical training and work placements are key elements in enhancing graduates' employability. Data from both European comparative studies and national reports show that students who participated in practical training before graduation are more likely to find jobs than their counterparts without relevant work experience.¹ EU student mobility programmes such as the Life-long Learning and Erasmus+ programmes contribute significantly to mobility for UK students.

Research for the British Council among employers found that organisations valued intercultural skills for the benefit they bring to keeping teams running efficiently, building trust with clients and developing relationships with new clients. These benefits also carry significant monetary value to employers and employees with these skills of significant benefit to employers.²

A study of international employers by CIHE (now NCUB) found the attribute considered of most importance in new graduate recruits was the ability to work in multi-cultural teams, and this finding has been reinforced by other studies. This is one of several attributes which students often develop in the course of a period of Erasmus study or work.

¹ European Commission/EACEA/Eurydice (2014), Modernisation of Higher Education in Europe: Access, Retention and Employability 2014. Eurydice Report. Luxembourg: Publications Office of the European Union, p69.

² British Council, Culture at Work (2013), p12.

Research among Erasmus mobility students has found that almost all consider that study abroad has enhanced their employability. They also rate their foreign language skills and ability to work in an intercultural or international workplace environment – increasingly vital skills for the UK economy - much higher than their counterparts with no study abroad. Finally, they felt that studying abroad helps widen individual career opportunities by enlarging networks, improving knowledge of foreign languages and boosting self-confidence.³

In 2011-12 the Erasmus strand of LLP supported 13,662 students, who received an average monthly grant of €385 to help with the costs,⁴ to study or work abroad. In 2012-13 there were 14,572 outgoing UK Erasmus students, who received an average monthly grant of €375 to help with the additional costs of their period of study or work.

In the **schools sector**, the Comenius strand of the Lifelong Learning programme provided opportunities for UK schools to collaborate with schools in other European countries. A range of evidence shows that benefits gained from participation support UK education priorities. The continuation of such opportunities under Erasmus+ will enable the benefits to continue.

In the context of improving the quality of teaching, a priority in all four UK countries, the impact of EU collaboration on teachers was very positive. A British Council-commissioned impact study of Comenius school partnerships in 2012 analysed almost 483 Comenius school partnership UK beneficiary reports and found that 75% of schools rated the partnership highly for its impact on staff development, which included increased:

- leadership and management skills
- pedagogical expertise
- staff motivation
- knowledge and understanding of other countries and cultures.

The following quotes from beneficiaries illustrate this:

"The partnership project was one of the most motivating forms of professional development that school staff have been involved in for a number of years. They learned so much from the opportunities to observe good practice and pedagogy in other countries."

"The experience was highly motivational for all staff concerned and had a real impact on pedagogy and practice."

"Fantastic professional development."

One school in particular considered the impact on staff to be very high:

"The organisational demands of the project were very high. Our staff met these demands and learned a great deal in the process. In addition, the opportunity to

³ Erasmus Student Network (2012), ESN survey 2011 – Exchange, Employment and Added Value <http://bit.ly/1kXutdM>

⁴ The EU Budget in my Country – United Kingdom. <http://t.co/uGKYE6AuZK>

observe and cooperate with teachers from other countries has had a very high impact on our own professional development in learning and teaching".

468 Comenius beneficiaries responded to the British Council's Annual Impact Survey in spring 2012, about the impact of their involvement with the British Council/Comenius on them professionally and personally, and on their institutions. Notable responses from the Comenius respondents were:

- 79% said their involvement in Comenius had had a 'significant' or 'very significant' impact on their own professional development (including leadership skills and teaching methods)
- 90% said it had had a 'significant' or 'very significant' impact on their understanding of other cultures, countries and people
- 80% said it had had a 'significant' or 'very significant' impact on their confidence in their own area of work
- 70% said it had had a 'significant' or 'very significant' impact on their students' understanding on other cultures, countries and people
- 80% said it had had a 'significant' or 'very significant' impact on their own professional life

Narrowing the attainment gap in schools is another UK-wide education priority: a 2013 report about the impact of the EU's eTwinning programme concluded: a range of evidence indicates that eTwinning projects are inclusive and can be instrumental in narrowing the gap, for example, by:

- increasing enthusiasm for learning that is linked to the ability to share 'real' work with a 'real' audience for a 'real' purpose
- providing a non-threatening learning environment;
- valuing a range of skills;
- developing social skills;
- raising self-confidence and self-esteem;
- building strong relationships between staff and pupils;
- improving literacy and social skills.

Enabling schools to participate in international opportunities also potentially widens young people's access to future mobility opportunities: through experiencing positive international experiences supported at school level, young people are more likely to take part in mobility opportunities at tertiary level.

A recent report by the Confederation of British Industry highlights the fact that 61% of employers 'perceive shortfalls in international cultural awareness among school and college leavers'. The report clearly indicates that business leaders see global education for young people as vital if the UK is to compete in the global economy. 83.4% of final reports analysed in the Comenius impact study referenced above rated the impact of the Comenius school partnerships on learners highly. The main areas include increased global awareness, motivation and self-confidence. Collaborative projects also provide the opportunity for UK participants to better understand and appreciate their own identity and values: one of the first activities in

many partnerships is for partners to define and communicate aspects of their own culture.

The main finding from the British Council's Culture at Work publication: <http://www.britishcouncil.org/organisation/publications/culture-work-intercultural-skills-workplace> is that employers in different parts of the world, including the UK are increasingly valuing skills in inter-cultural communication above formal qualifications.

3 Do you think the EU, as opposed to national government, should do more or less in relation to education and training? If so, where and why?

Comments:

As noted above, the EU's mobility and partnership programmes in education and training, including informal and non-formal youth sector activity (now brought together in the Erasmus+ programme, 2014-20) provide opportunities for individuals and organisations to pursue nationally agreed policy outcomes by means of international collaboration, exchange and partnership. Such programmes include common processes and tools for collaboration, and importantly they also provide supportive funding over a significant period of 7 years, funding which might not otherwise be available at national level – particularly during a period of sustained pressure on public finances across Europe.

Erasmus+ and associated activities can therefore be seen as a highly valuable form of EU involvement in education and training – where the primary purpose is the transfer of good practice and innovation, among individual learners and education professionals, rather than the creation and co-ordination of policy.

The EU can usefully add value to national activities in education and training where there is a clear benefit from coordinated action at a higher level than Member State level. There are more likely to be efficiency gains from co-ordinated cooperation facilitated by the EU institutions than by bi-lateral arrangements between individual states.

In Higher Education the European Commission funded 'Study in Europe' fairs and the related student choices portal have been examples of a co-ordinated approach to inward recruitment to Europe and a more general move to represent European HE 'on the world stage'.

EU activities aimed at supporting the recognition of qualifications, learning and training abroad are more efficient than each Member State making multiple bi-

lateral arrangements with each other. In addition, co-ordinated action at EU level with third partner countries is more efficient than at Member State level.⁵

The focus of EU action in education and training should be on continuing to support Member States in effectively and efficiently implementing the Erasmus+ programme.

4 What other areas of EU competence or activity have an impact on education and training in your sector and how?

Comments:

EU activities in employment and culture are also relevant to education and training.

5 What challenges or opportunities are there for the UK in further EU action on education?

Comments:

EU action in education and training provides the UK with an opportunity to become a market leader in education and training provision. A single European education area with recognition of higher education and vocational education and training across Europe facilitates the UK's recruitment of high-calibre students from across the continent.

Organisational and professional partnerships and learning from peers in other Member States can help strengthen teaching and research, enriching studies through providing an international dimension to teaching and learning.

One challenge for the UK is to take full advantage of the opportunities available through EU activities through making the European (or international) dimension more central to UK education and training. This includes at national level with policy-makers taking an active lead as well as at institutional level. There are real

⁵ Erasmus Student Network (2014), Automatic Recognition of Full Degrees. <http://bit.ly/1nB6Irl>

opportunities for the UK in EU education and training activities, and the UK should aim to derive maximum benefit from them, notwithstanding any possible future change in the nature of the relationship between the UK and the EU.

The UK HE sector currently has a very strong position in the recruitment of international students, and the income derived from this now represents a significant proportion of the income stream of many UK institutions. There are potential competitive challenges to this in the growth of interest in this market among institutions of mainland Europe, the increased amount of teaching in the medium of English in Europe, and some UK institutions may be wary of coordinated European support for this.

The high quality and value to international graduates of the UK 1 year masters programmes needs to be promoted actively and consistently in the context of European harmonisation of qualifications, and especially the Bologna process.

Erasmus+ offers significant new opportunities for UK higher education to benefit from the European dimension in education and training. Apart from the new international perspective in HE mobility, there are now opportunities for sectoral and cross-sectoral cooperation in projects designed to promote innovation, and also for larger scale multilateral cooperation with business.

For schools, the focus in Erasmus+ on the institution rather than on individual teachers aims to encourage increased systemic impact. For example, Key Action 1 specifically requires schools to specify their objectives for institutional development and how the proposed activities will contribute towards these.

6 What international bodies or arrangements other than the EU are important to education and training in the UK? How does your experience of dealing with them compare with the EU's activity in this sphere?

Comments:

The UK's higher education institutions have a well-established and extensive network of associations of different kinds with a very large number of institutions in other countries.

The Bologna Process continues to have an important influence on the development of structures and systems in higher education in the UK. While 2010 saw the formal inception of the European Higher Education Area, many of the main Bologna action lines continue, and have a bearing on qualifications frameworks, credit systems, quality assurance, mobility, lifelong learning, and other aspects of higher education and its management in the UK.

The Bologna Process is an intergovernmental process, and is independent of the

European Union. The EU, nevertheless, has taken a close interest in it, and its development, since the process supports many of the EU's own aims and ideas in this area. In many respects, for example, Bologna has complemented student mobility, and the academic infrastructure necessary for mobility to thrive. The EU's contribution to supporting teams of academic experts at national level ('Bologna Experts') has proved of benefit to the UK, in raising awareness of the process and improving understanding of it.

The Programmes

7 For the specific programmes which are funded and managed via the EU (such as Erasmus or Leonardo), what are the benefits or disadvantages of having EU rather than national responsibility and funding for these activities?

Comments:

There is a strong efficiency case for coordination at a European level. A single central EU management (supported by input and oversight by Member States) is likely to be more efficient than 28 separate national initiatives at country level.

While responsibility for the Erasmus+ Programme ultimately rests with the EU, Member States do play a significant and important role in designing and managing the programme. At EU level, Member States were all actively involved in the decision to establish the Erasmus+ programme and in the setting of the EU budget through their membership of the Council of the European Union. Member States cooperate with the Commission throughout the 7 years of the programme to ensure alignment with national policy, to monitor and report on the performance and results of the Programme⁶ and to ensure complementarity with other EU programmes and actions.⁷

The nature of the activities – transnational cooperation, individual mobility and exchange of good practice – makes it appropriate that they are coordinated at EU level. This provides a stable source of ring-fenced funding for these activities that allow longer term planning over 7 years by participating institutions.

The coordination of activities in this area by a central coordinating body (the European Commission and its Executive Agency) goes some way to limiting the risk that unco-ordinated national perspectives could lead to imbalance in outcomes.

The existence of a strong European network of National Agencies for Erasmus+ and National Support Structures for eTwinning and EPAL in each country provides the UK with the opportunity to influence how programmes are developed

⁶ OJEU (2013), Regulation (EU) No. 1288/2013 of the European Parliament and of the Council of 11 December 2013 establishing 'Erasmus'. Article 21:1.

⁷ OJEU (2013), Regulation (EU) No. 1288/2013, Article 25.

and implemented Europe-wide, and also to learn from others how to improve processes and services for the UK education and training sectors.

8 Can you point to evidence which shows that language learning has improved through participation in the programmes?

Comments:

We have not analysed the data in this area systematically, but the impression gained from a review of reports returned to the National Agency by Erasmus students after their period of study/work is that their view is that their language skills have improved. Comenius beneficiary reports indicate that participation in Comenius activities can result in improved language skills for both school staff and pupils. For example, analysis of almost 500 Comenius beneficiary reports from 2011 showed that 63% of teachers and 70% of pupils had increased language skills as a result of participation in a Comenius school partnership.

Further evidence is available from Comenius In-Service Training (IST), which provided funded opportunities for professional development of any school staff (from headteachers to janitors), whether job shadowing a colleague or participating in a course of interest in another European country. The majority of mobilities (over 70%) were undertaken by language teachers, and, as an example, 84% of those who took part in 2011 reported that their experience had had a high or very significant impact on their knowledge of the subject they taught.

The Commission's new approach to a systematic assessment under Erasmus+ will confirm objectively how far language learning is improved through participation in the Erasmus+ programme, as mobility participants in Erasmus+ (in many cases) will be required to complete a pre- and post-mobility online language test.

The results of the initial test will be used to provide appropriate support to students on their mobility placement, thereby improving the provision of targeted language learning. The post-mobility test will allow the assessment of progress made in the foreign language.

Aggregated data collected in this way will allow assessment of progress against one of the indicators defined in the legal decision establishing the programme.

The **European Language Label** encourages multilingualism: see http://ec.europa.eu/languages/policy/strategic-framework/language-label_en.htm and sets European priorities for the Label campaigns, to which national priorities can be added. The UK participated from 1999 to 2013, and in our view it is unfortunate that the UK is in 2014 the only country not participating in the European Language Label.

We would strongly encourage the UK government to agree to the UK joining the European Language label again in 2015, as there is strong demand in the UK for this.

9 How would you describe the costs and benefits to your organisation of participating in the programmes?

Comments:

In financial terms, there are two strands of funding with two separate sets of costs and risks attached. These strands are the management fee received from BIS which includes the EC operating grant, and the operational funds received from the EC for distribution to beneficiaries following competitive assessment exercises.

The actual management costs of administering the Erasmus+ programmes should be fully recovered through the costing and pricing mechanism agreed in our contract with BIS as National Authority for Erasmus+. We carry the risk of the management fee being insufficient to cover all costs over 7 years should circumstances change including exchange rates.

The operational funding should be fully met by the EC, up to €840m over the 7 years of the programme. However, in cases where beneficiaries are due to repay any funding received but which has not been spent or has been spent ineligibly, we carry the risk that in some cases it may not be possible to recover this money either from the beneficiary or from the EC.

Benefits of administering the Erasmus+ programmes include:

- the opportunity for the British Council to develop further cultural relations work in education, in areas of strategic importance to the UK;
- the connection between aspects of the programme activity and areas of wider interest to the British Council (for example better understanding of the development of intercultural competences, the relationship between mobility and employment and the collaboration of institutions in developing new curricula);
- the British Council's ability to demonstrate, through our ISO accreditation for grant management, our externally benchmarked performance in managing the Erasmus+ programme activity to internationally agreed standards
- the opportunity to work as the National Agency in a consortium with our partner organisation Ecorys UK, for mutual learning and benefit;
- the opportunity to benefit from connections made through the EU-wide National Agency network to pursue other projects.

Policy Coordination

10 Have you noticed any change in EU activity or emphasis since the 2009 Treaty of Lisbon and the introduction of Europe 2020, and, if so, where has this manifested itself and in what ways? Have these changes been helpful or unhelpful?

Comments:

The country-specific recommendations under Europe 2020 are a useful independent way of benchmarking the UK with our European peers. This process highlights areas where improvements may be required, but also which countries to look towards for good practice examples.

The European Commission is becoming increasingly aware of the global competition for talent, the rise of Asian education systems and influence due to demographic and other changes, and the interdependencies of cultures and countries in relation to security. Against this backdrop there is some evidence that the Commission is seeking greater informal integration and co-operation between national agencies involved in Education. The 'European Higher Education in the World' strategy/promotional material (<http://eur-lex.europa.eu/legal-content/EN/NOT/?uri=CELEX:52013DC0499>) and recently formed network of national agencies point to this.

11 Is it appropriate that Europe 2020 focusses on early school leaving and the completion of tertiary education?

Comments:

These are appropriate topics for EU activity, as there is a common interest at national level in the majority of EU Member States, including the UK, in improving educational attainment and employability through encouraging all students to complete their compulsory schooling, and through encouraging a higher proportion of the population to continue their education beyond school and complete tertiary level education.

The setting of national targets in these areas is voluntary – it is for individual Member States to decide whether the targets are appropriate for them and whether to set their own targets. The UK has declined to do so in the case of early school leaving and completion of tertiary education - this is in line with the established principle of subsidiarity. However, comparative studies e.g. by Eurydice are helpful in this context, for benchmarking and for facilitating the transfer of information, expertise and best practice between Member States and systems, including in the UK, to support the development of policy solutions to the underlying issues.

12 Has the adoption of EU education policy frameworks or Council Recommendations had any impact on your sector?

Comments:

No comments.

13 How does policy cooperation on education in the EU compare with other organisations, for example the OECD?

Comments:

No comment.

14 Can you point to examples of reform in national policy which have resulted from EU co-operation in education and training?

Comments:

The Bologna Process has resulted in the creation of the European Higher Education Area (EHEA). This aims to ensure more comparable, compatible and coherent systems of higher education in Europe. It involved 47 states and several trans-national bodies including the EU.

The Richards Review of Apprenticeships draws on learning from our European neighbours (including Germany, Denmark and Switzerland) where apprenticeships are held in high regard.

15 How would you assess the costs and benefits to policy makers of participation in education policy cooperation at EU level?

Comments:

We are unable to assess the costs. There are benefits to policymakers from the exchange of best practice, learning and policy coordination at international level, including with other European countries.

This is recognised by the UK which participates in the OECD's Programme for International Student Assessment (PISA) and efforts to implement learning from the Swedish Free Schools movement.

YOUTH QUESTIONS

General Issues

16 What evidence is there that EU action in the area of Youth benefits or disadvantages the UK?

Comments:

In our experience EU action in the area of Youth brings considerable advantages to the UK, with no associated disadvantages.

The UK has been a full participant in three successive EU youth programmes: Youth for Europe 1999-2006, Youth in Action 2007-2013 and Erasmus+ (Youth Chapter) 2014-2020.

Participation data from Youth in Action (YiA) shows steadily increasing interest among young people, and those who work with young people, in the opportunities available under the programme for non-formal learning with an international dimension. Personal testimonies highlight the impact of new and transferable skills on an individual's employability. Participants also refer to an increased sense of citizenship from the experience of making a practical difference on the issues that affect young people's well-being.

In common with the EU's education and training programmes (see above, paras. 1-15), Youth in Action enables individuals and organisations to pursue nationally agreed learning outcomes by means of international partnerships. This includes access to common processes for collaboration and supportive funding, which would not otherwise be available – particularly during a period of sustained pressure on public finances.

Youth in Action's final year saw continued rapid growth in UK participation. A total of 926 project applications were received – up 56% on the previous year. There were marked increases in demand from all countries and regions of the UK, especially Northern Ireland (up 76%), Scotland (up 116%) and Wales (up 54%). This led to the largest ever commitment of Youth in Action grants in the UK, at over €14 million (up from €6 million in 2007).

There is also evidence of impact from the EU programmes on levels of capacity in UK youth and community organisations.

Of the 531 UK projects approved under Youth in Action in 2013, 310 were rated at the highest level (i.e. scoring above 70%) in external assessment. This is equivalent to an increase of 21% from the previous year. The demand of managing complex international projects, to the standards required in EU programmes, is contributing to professionalisation in the UK's youth and community sector – with associated benefits to young people themselves.

It should be emphasised that support under the EU programmes is granted on the basis of competitive selection – and is therefore a further source of quality improvement in youth and community organisations.

Increases in levels of participation – and in the scale, ambition and creativity of

individual projects – also contribute to improved recognition for the importance of non-formal learning, particularly non-formal learning with an international dimension.

This is reflected in the interest and involvement from central and local government, national voluntary bodies (such as YMCA) and commercial organisations (such as, English Premier League). Recent youth policy statements in each of the UK's four countries clearly advocate the benefits to young people from international collaboration.

17 Do you think the EU should do more, or less, in relation to Youth, and why?

Comments:

The British Council believes that the EU should continue with its current level of Youth-related activity without major change. Any diminution of its role in this area would be detrimental to the UK's national interest. This is because current programmes are effective and provide excellent support to the UK youth sector, with scope for growth to 2020.

EU action in relation to Youth is now closely aligned with the over-arching plan for increased prosperity, EU2020. Specific actions to support young people in their learning and employment have been grouped together under Youth on the Move (<http://ec.europa.eu/social/main.jsp?catId=950&langId=en>). In most cases, these are part of the new Erasmus+ programme. Erasmus+ is the main source of practical EU support for young people in Europe, and for those who work with young people.

EU action in relation to Youth in the coming years should therefore focus on the effective and efficient implementation of the Erasmus+ Youth Chapter.

18 Do you think the EU focuses on the right aims and priorities in the Youth field?

Comments:

Objectives and priorities for the Youth Chapter of Erasmus+, as set out in the Programme Guide, clearly link to the three goals of Youth on the Move (see above, para. 17):-

- Making education and training more relevant to young people's needs;
- Encouraging more of them to take advantage of EU grants to study or train in another country;
- Encouraging EU countries to take measures simplifying the transition from education to work.

Erasmus+ gives welcome emphasis to the importance of widening the range of organisations contributing to young people's learning. In the UK context, there are already well established patterns of inter-agency working and examples of innovative partnerships with private businesses - for example, encouraging young people's learning through sport. Involvement in Erasmus+ will encourage this trend and will provide opportunities to share UK good practice and innovation more widely.

19 Have you noticed any change in EU activity or emphasis since the 2009 Treaty of Lisbon and the introduction of Europe 2020, and, if so, where has this manifested itself and in what ways? Have these changes been helpful or unhelpful?

Comments:

Adoption of the EU 2020 Strategy has included formulation of country-specific recommendations. These are helpful in articulating the contribution made by non-formal learning – learning undertaken voluntarily outside the formal setting of school, college, university or work-place.

Non-formal learning (particularly non-formal learning with an international dimension – with real and measurable impact on young people's employability and citizenship) is clearly important in responding to the observations that,

- a significant proportion of young people [in the UK] do not have the skills and qualifications they need to compete successfully in the labour market
- insufficient knowledge of foreign languages may constrain the ability of companies to conduct business in foreign markets. According to a recent survey, the overwhelming majority of business owners do not possess the necessary language skills to conduct business in the buyer's language, with 52% of respondents claiming that language barriers are either highly or somewhat influential when deciding if, when and where to export.

20 Has the adoption of the Structured Dialogue had any impact on your sector?

Comments:

Structured Dialogue gives valuable opportunities to UK young people to contribute directly to decision-making at the European level. It also supports the development of valuable knowledge concerning democratic participation and transferable skills in communication and consultation.

A network of UK Young Ambassadors (<http://www.ukya.org.uk/>) has been created (with support under the Eurodesk strand of Youth in Action and Erasmus+) to co-ordinate UK input to Structured Dialogue.

Since 2010, the 8-10 Young Ambassadors have led consultation with over 5,000 UK young people, identifying the issues of most concern, representing young people's interests, communicating results and generating follow-up – locally, nationally and internationally.

UK Young Ambassadors have also worked effectively with counterparts to bring about improvements to the Structured Dialogue process – such as, simplification in the scope of consultation and in the practical procedures.

It is significant that Structured Dialogue has become the focus for projects supported under the policy reform strand (Key Action 3) of Erasmus+. The UK is well placed to take full advantage of these opportunities.

21 What other areas of EU competence or activity have an impact on your sector and how?

Comments:

The range of youth sector concerns and related EU initiatives are reflected in the EU2020 strategy, as noted above. EU actions regarding employment, environmental sustainability, health and social welfare will continue to have a direct impact on young people in the UK – and on youth/community organisations.

Through Structured Dialogue (see above, para. 20), young people have opportunities to identify links and inter-dependencies, which may otherwise be unrecognised in policy-making.

22 What international bodies or arrangements are important to your sector beyond the EU?

Comments:

The following multi-lateral bodies have a recognised role in standard-setting in relation to youth policy:-

- Council of Europe
- UNESCO

Under Erasmus+, there is likely to be continuing collaboration with UNESCO, in particular, to support capacity-building in youth work and non-formal learning.

Other relevant organisations include the Open Society Foundation, as well regional bodies such as the Asia-Europe Foundation.

23 Has the EU had an impact on young people's opportunities to have a voice in policy and decision making, or on organisations' work to involve young people in shaping services?

Comments:

As well as the impact of Structured Dialogue (see above, para. 20), the EU programmes have given opportunities for UK young people to work with counterparts in other countries on projects that address issues of direct concern in their own communities.

Local democracy projects from the UK attracted over €1.8 million in EU grants (under the Youth in Action programme) between 2011 and 2013.

Case-study: IVOLO

IVOLO (International Voluntary Organisation for Learning Opportunities) exists to give young people the skills they need to fulfil their potential – in whichever direction life takes them. Through different activities, young people throughout Europe are supported to link with their peers – to exchange ideas, learn new skills and enhance their own development.

The idea for the Active Citizenship project came from participants themselves, as IVOLO's Christopher Rumble explained: "Research by our school and youth councils showed that many young graduates face a gap between theoretical knowledge and its practical application in employment."

Youth in Action supported enabled Austrian, Polish and UK participants, including those from a school student council in Tamworth, to attend a six-day seminar in Warsaw, to develop a joint plan of action, and to present this to local politicians. "They all shared similar issues," said Christopher. "It's difficult for young people in each of the countries represented to find a job with a good career path. Work is available, but with few prospects for progression."

The students worked in small group to formulate their recommendations and priorities, wherever possible creating opportunities for employers and young people to collaborate on follow-up actions. These working-groups were also the basis for improvement in self-confidence and communication skills – especially in the context of advocacy, debate and negotiation with decision-makers.

Participants came away from the project with practical knowledge – not only of each other's cultures and lifestyles, but also of employment opportunities, and of how to be proactive in accessing the different schemes and projects available to help them.

"I've really enjoyed being involved in running our own activities. The project has helped to raise my own aspirations," said Callum aged 16.

Number of participants: 30; Project duration: 6 months; Size of grant €48,527

24 Has the EU had an impact on young people's social inclusion in the UK?

Comments:

Social inclusion has been one of the driving forces in the EU's education, training and youth programmes. In practice, however, the complexity of administration has sometimes created barriers to involvement by the young people who might derive greatest benefit.

The Youth in Action saw significant improvements in access to learning mobility, with two out of three UK projects selected for grant funding in 2013 having an explicit focus on the most disadvantaged and vulnerable young people.

This pattern is expected to continue under Erasmus+, given the provision to cover 100% of the additional costs associated with mobility by young people with disabilities.

Under Erasmus+, the UK will continue to host the SALTO Resource Centre for Cultural Diversity. This works across the network of Erasmus+ National Agencies to improve levels of participation in the programme, developing training and other tools to address obstacles arising from all forms of diversity.

Case-study: The Road to Inclusion

The Road to Inclusion training gave young volunteers from eight European countries skills to lead short-term international volunteer projects. Taking place over a week, the project focused on enhancing the leaders' abilities to welcome and support young people with fewer opportunities on to short term volunteer projects across Europe.

"Through short-term European Voluntary Service projects, we're sending more and more young people who are not necessarily from an independent background to volunteer across Europe," said Helen Wales, Director of UNA Exchange, an

international volunteering charity based in Cardiff. “We’ve run the event for leaders from the UK before, but running a European event allowed us to take the training to the next level and share approaches with our international partners.”

Designed, led and supported by UNA Exchange’s volunteers, the training covered team-building, conflict management and mediation. The exercises were hands-on, encouraging participants to reflect critically on how they approached issues of inclusion. “The participants took part in an activity and got immersed in it - then they brought that experience to some theory work, rather than the other way around.”

There were also some unexpected learning outcomes. As one of the participants was a wheelchair user, her experience gave the group a chance to consider other forms of inclusion.

The response to the training was very positive. A volunteer from Compagnons Bâisseurs in Belgium has even incorporated some of the exercises into a training programme there.

“That multiplier effect was one of the things we wanted to get from the event, sharing the activities and learning with all the partners,” said Helen. “Feedback showed that we had taken the participants a big step further in terms of widening their idea of who international volunteers might be and what their own roles as project leaders would be in supporting them.”

Number of participants: 18; Project duration: 1 week; Size of grant €11,154

Youth Programmes

25 What are the benefits or disadvantages of having EU rather than national funding for activities under the Youth Programme?

Comments:

As noted above (para. 16), access to the EU Programmes enables individuals and organisations to pursue nationally agreed learning outcomes by means of international partnerships.

This includes access to common processes for collaboration and supportive funding, which would not otherwise be available.

This EU funding is particularly valuable during a period of sustained pressure on public finances. In the UK, expenditure on youth services in Local Government has been subject to ongoing reductions – e.g. in England spending was reduced by 10.4% from 2011/12 to 2012/13.⁸ In this context, the Erasmus+ programme provides a valuable source of funding support for activities for young people and young people's services.

26 What do you think about the criteria and conditions set by the EU for applying for and receiving funding?

Comments:

Certain criteria and conditions are necessary to ensure the appropriate distribution and spending of public funds and to ensure that EU funds are allocated according to the established procedures and regulations. These procedures and regulations allow scrutiny and oversight of the funding decisions taken. Member States have the capacity to influence these procedures and regulations through the Council of the European Union and through their MEPs in the European Parliament.

There is a continuing need in the EU programmes to press for proportionality in the procedures used for youth and community organisations. It is important to recognise that this sector tends to have lower levels of resourcing than other areas of (formal) learning – and that financial and organisational capacity is more precarious.

The EU recognises that application processes can be a barrier to participation in EU funding Programmes. Under Erasmus+ the applications process has been simplified to ease the burden. The introduction of digital platforms under Erasmus+, together with increased use of fixed-rate payments, is likely to simplify the burden of project administration on beneficiaries.

At the same time, the competitive nature of the EU (grant-giving) programmes, together with the encouragement for exchange of good practice and innovation, can be important sources of quality improvement.

⁸ Youth Service in England: the State of the Nation (2013): <http://bit.ly/1nBm4fX>

27 What do you think about the aims and activities of Erasmus+ in comparison to the Youth in Action programme?

Comments:

As noted above (para 18), the scope and content of the Erasmus+ programme is comprehensively detailed in the Programme Guide. This reflects the pressing need to make a difference on the over-arching concerns of EU2020. As such, Erasmus+ appears to be both more relevant and more practicable than its predecessor.

The emphasis is clearly on addressing issues of employability and skills, which is a welcome focus. At the same time, there appears to have been a reduction in the importance given to inclusion, even though this is one of the core principles of EU2020.

SALTO Cultural Diversity (see above, para. 24) is now working with European partners (including the European Commission) to develop a set of strategic principles and practical tools that will embed Inclusion and Diversity in the new programme.

28 Any other comments?

Comments:

As a partner in the Erasmus+ UK National Agency, the British Council would welcome the opportunity to share learning from the Programme with the DfE, BIS and other government departments and the devolved administrations. We can provide information about projects and their activities, invitations to events and can help organise study visits to or from projects involved in specific areas of policy interest.

Additional reading, references and information:

British Council

- Culture at Work – the value of intercultural skills in the workplace (2013): <http://bit.ly/1nAy5lQ>
- Culture Means Business – How international cultural relationships contribute to increased trade and competitiveness for the UK (2013): <http://bit.ly/UyOKMU>

European Commission & Institutions

- Evaluation of the European Quality Assurance Reference Framework for

Vocational Education and Training (EQAVET) (2013): <http://bit.ly/1p0CrIF>

- External Evaluation of the European Centre for the Development of Vocational Training (Cedfop) (2013): <http://bit.ly/1okVLxT>
- FP7 Marie Curie Actions Interim Evaluation (2013): <http://bit.ly/1qaJbRC>
- Second Evaluation of the Europass – Final Report (2013): <http://bit.ly/1nAI0HT>
- Study of the impact of eTwinning on participating pupils, teachers and schools (2013): <http://bit.ly/1jomFNy>
- Study of the Impact of Comenius Centralised Actions (2013): <http://bit.ly/1kSJjSP>
- FP7 Marie Curie Life-long Training and Career Development Evaluation - Individual Fellow-ships and Co-funding Mechanism (2012): <http://bit.ly/1qaJs6V>
- Interim Evaluation of Erasmus Mundus II (2012): <http://bit.ly/1lgwAEy>
- Interim Evaluation of External Cooperation Agreements in Higher Education, Training and Youth with the US and Canada (2011): <http://bit.ly/1kv2Ljx>
- Interim Evaluation of the Lifelong Learning Programme (2011): <http://bit.ly/1kSM9XW>

Other

- Erasmus Student Network survey (2005-2012): <http://www.esn.org/esnsurvey>
- Database of EU education and training projects: <http://ec.europa.eu/programmes/erasmus-plus/projects/>
- EU Leonardo da Vinci project database: <http://www.adam-europe.eu/adam/homepageView.htm>
- EST project database: <http://www.europeansharedtreasure.eu/index.php>

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply.	X
E-mail address for acknowledgement: Rebecca.hughes@britishcouncil.org	

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, please confirm below if you would be willing to be contacted again from time to time either for research or to send through consultation documents?

<input checked="checked" type="checkbox"/> Yes	<input type="checkbox"/> No
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All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](#)

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and use real discussion with affected parties and experts as well as the expertise of civil service learning to make well informed decisions
- departments should explain what responses they have received and how these have been used in formulating policy
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

If you have any comments on how DfE consultations are conducted, please contact Aileen Shaw, DfE Consultation Coordinator, tel: 0370 000 2288 / email: aileen.shaw@education.gsi.gov.uk

Thank you for taking time to respond to this consultation.

Completed responses should be sent to the address shown below by 30 June 2014

Send by post to:

International Education Division, Department for Education, Sanctuary Buildings, Great Smith Street, London, SW1P 3BT.

Send by e-mail to: BalanceofCompetence.consultation@education.gsi.gov.uk.