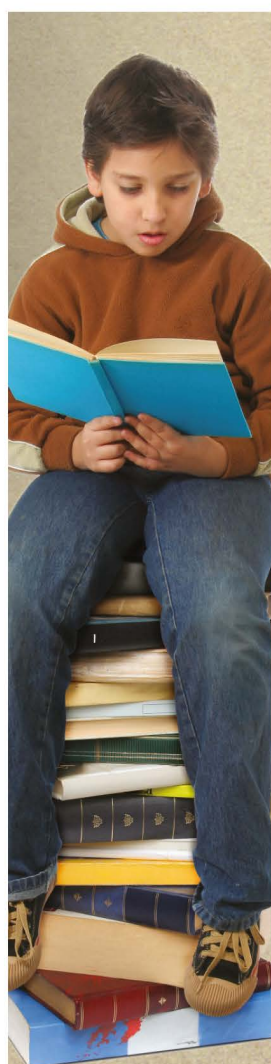


DIRECTORATE-GENERAL FOR INTERNAL POLICIES

POLICY DEPARTMENT
STRUCTURAL AND COHESION POLICIES **B**



Agriculture and Rural Development

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**Research for CULT Committee -
European Solidarity Corps and
volunteering**

STUDY



DIRECTORATE-GENERAL FOR INTERNAL POLICIES
Policy Department for Structural and Cohesion Policies

CULTURE AND EDUCATION

**Research for CULT Committee -
European Solidarity Corps and
volunteering**

STUDY

This document was requested by the European Parliament's Committee on Culture and Education.

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DIRECTORATE-GENERAL FOR INTERNAL POLICIES
Policy Department for Structural and Cohesion Policies

CULTURE AND EDUCATION

Research for CULT Committee - European Solidarity Corps and volunteering

STUDY

Abstract

This study provides an assessment of the legislative proposal for the establishment of the European Solidarity Corps. It focuses on the added value of the ESC; challenges linking EU programmes; and the complementarity to paid employment. It concludes that in principle the initiative is welcome; however, many issues in the proposal (and supporting documentation) are not sufficiently made clear. The most important concerns are: 1) level of engagement of stakeholders in the ESC framework; 2) feasibility to achieve 100,000 solidarity activities; 3) assuring participation of disadvantaged groups; 4) disparities between volunteers in different programmes; 5) the status of the quality label; 6) capacities of National Agencies; 7) lack of clarity on how to distribute ESC activities and funding across Member States; 8) lack of a monitoring system; 9) unclear definition of 'solidarity activity'; 10) lack of safeguards to prevent replacing paid employment; 11) the choice for not integrating ESC in Erasmus+ should be better explained.

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LIST OF ABBREVIATIONS

CSR	Corporate Social Responsibility
EACEA	Education, Audiovisual and Culture Executive Agency
EC	European Commission
EP	European Parliament
ESC	European Solidarity Corps
EURES	European Employment Services
EVS	European Voluntary Service
MS	Member States
NA	National Agency
NGO	non-governmental organisation

EXECUTIVE SUMMARY

Introduction

This in-depth analysis assesses the Commission's legislative proposal on the European Solidarity Corps (ESC). It reflects on the following key questions:

- **Added value of the ESC:** In what sense will the ESC add value for individual participants and at societal level? In particular, how does this compare to what is already done in the field of volunteering?
- **Challenges linking programmes:** What are the challenges to interlinking the ESC with Erasmus+ and other existing EU programmes which include(d) volunteering activities?
- **Complementarity to paid employment:** How can the ESC operate in a way that complements rather than replaces paid employment?

The European Solidarity Corps proposal

The ESC has as general objective "to enhance the engagement of young people and organisations in accessible and high quality solidarity activities as a means to contribute to strengthening cohesion and solidarity in Europe, supporting communities and responding to societal challenges" (EC, 2017c: p.25, Article 3). It enables young people between the ages of 18 to 30 to partake in the following types of solidarity actions both across-borders and in-country:

- **Volunteering placements:** full-time unpaid voluntary service for a period of up to twelve months;
- **Traineeship placements:** period of work practice from two to twelve months, which is remunerated by the organisation hosting the European Solidarity Corps participant;
- **Job placements:** period of work from two to twelve months, which is remunerated by the participating organisation employing the European Solidarity Corps participant;
- **Volunteering teams' placements:** placements allowing teams of European Solidarity Corps participants from different participating countries to volunteer together for a common objective;
- **Solidarity projects:** a local initiative for a period from two to twelve months, which is set up and carried out by groups of at least five European Solidarity Corps participants;
- **Networking activities:** allowing participants and organisations to build up their network.

Within the solidarity placements, the ESC has two strands, namely the volunteering strand and the job-related strand. In both cases, the ESC is not providing wages. For volunteering activities, it does, however, provide pocket money to support living costs. If the ESC concerns a solidarity job/internship placement, the participating organisation will have to provide wages/compensation.

Besides these solidarity actions, the ESC offers quality and support measures, including support for participants, quality labels for organisations, a Resource Centre, and a Portal and other online services.

The European Solidarity Corps will use the existing management and implementation arrangements already in place under the Erasmus+ programme (EC, 2017c, p.12). By 2020, the ESC envisions to meet its goal in placing 100,000 participants. To achieve this objective, the Commission proposes to implement the ESC with a budget of EUR 341,500,000 in current prices for the period from 1 January 2018 until 31 December 2020.

The underlying assumption of the ESC is that **through concentrating voluntary possibilities, and collectively branding the voluntary activities under one name, the supply and demand can be better matched. This coordination, in turn, results in a higher number of young people involved in solidarity activities and higher quality of services, leading to better outcomes.**

Conclusions

Positive elements of the ESC as identified in the assessment are:

- The ESC mitigates some of the identified barriers for individuals to engage in solidarity actions, especially concerning providing information, visibility and support for disadvantaged young people. Moreover, by encompassing internships and jobs, and in-country solidarity actions the ESC also broadens the scope of the EVS;
- The introduction of the quality label can contribute to establishing a quality culture (if not already existing);
- The ESC, compared to other forms of volunteering, can provide equal opportunities for all young people in the EU, regardless of the national opportunities.

The assessment of the ESC proposal yielded concerns related to the three earlier mentioned key questions, that require further action in the negotiations concerning the legislative proposal of the ESC. These concerns can be divided into five categories:

A Partnership

1. Are participating parties sufficiently engaged in the ESC framework to (i) ensure their commitment to quality, and (ii) represent and protect their interests?

B. Objectives and Aims

2. Will the ESC be able to deliver 100,000 solidarity activities in three years?
3. Does differentiating opportunities lead to higher participation of disadvantaged groups?
4. Does the ESC create disparity between different volunteers doing the same job under different programmes?

C. Implementation and Funding

5. Will the creation of a European quality label introduce additional responsibility and accountability for the European Commission?
6. Given that the implementation of the ESC relies on the Erasmus+ infrastructure, do the NAs have sufficient resources to conduct all tasks?
7. Concerning the distribution of funding at MS level, what funding is allocated per MS?

D. Monitoring and Misconduct

8. Given that the monitoring framework is not yet developed, how will the ESC's contribution to its general objective (strengthening cohesion and solidarity in Europe) be assessed?
9. Does the definition of 'solidarity activity' sufficiently clarify the requirements of the solidarity aspect in ESC supported activity?
10. Does the quality label include regulations to prevent replacing paid employment?

E. Policy option revisited

11. The choice for a separate initiative, above integrating the ESC in Erasmus+, could be better explained.

Recommendations

In relation to the above-mentioned concerns, the following recommendations are provided to the Members of the CULT Committee on the legislative proposal:

- **Recommendation 1:** Provide more specific direction in the proposal how partners are involved in the design, monitoring and implementation of ESC.
- **Recommendation 2:** The ESC proposal should elaborate how – as a matching mechanism – it operates in complementarity to national initiatives, and how national initiatives could benefit from the ESC, particularly in relation to the introduction of in-country solidarity actions. This also relates to rethinking how non-ESC volunteers will benefit from the matching mechanism and the additional services associated with the ESC (training, assessment, etc.).
- **Recommendation 3:** The proposal should elaborate on the objective, scope and governance of the quality label. Given the wide definition applied to “solidarity actions” and “participating organisations”, the demarcation of the application and the procedures for assuring quality needs to be rethought. Similarly, the workload associated with quality assuring ‘any public or private entity’ that applies to the ESC needs to be taken into consideration.
- **Recommendation 4:** The proposal should include a clear mechanism on how budgets are distributed to MS and what tasks the National Agencies need to conduct in terms of quality assurance, implementation, outreach and support.
- **Recommendation 5:** To assess whether the ESC proposal contributes to its stated objectives, the proposal should better explain how the ESC contributes to the foreseen results. This includes as well that the indicator-set needs to be in place to monitor progress towards results and the extent to which the ESC contributes to the stated objectives of other programmes funding it. This means that the development of a monitoring system cannot wait till six months after the Regulation enters into force. The monitoring system also needs to monitor closely the implementation. This is especially for assessing whether the new activities also benefit young people from more disadvantaged backgrounds.
- **Recommendation 6:** The legislative proposal should further clarify what is understood by solidarity actions, unmet societal needs and participating organisations. The current definitions leave room for a wide range of organisations to engage in solidarity actions while conducting commercial activities. In addition, the proposal should make explicit how it prevents misuse and replacement of paid employment.

1. OBJECTIVES AND METHODOLOGICAL APPROACH

1.1. Objectives of the in-depth analysis

The aim of the assignment is to deliver and present an in-depth analysis for Members of the CULT Committee of the legislative proposal on the European Solidarity Corps (ESC). The ESC is introduced as a new European Union initiative to create opportunities for young people to volunteer or work in projects, either in their own country or abroad, that benefit communities and people around Europe. This study can be characterised as a light-touch assessment¹ of the legislative proposal for the ESC. It will assess the Commission's legislative proposal and reflects on the following key questions:

- **Added value of the ESC:** In what sense will the ESC add value for individual participants and at societal level, compared to what is already done in the field of volunteering?
- **Challenges linking programmes:** What are the challenges to interlinking the ESC with Erasmus+ and other existing EU programmes which include(d) volunteering activities?
- **Complementarity to paid employment:** How can the ESC operate in a way that complements rather than replaces paid employment?

1.2. Methodology and structure of the report

To answer these questions, this study is based on both desk research and interviews. Based on the nature of the legislative proposal this study has a transnational scope; i.e., no case studies or country studies were conducted. Instead examples from country experiences and reflections are considered. More detailed information about the applied methodology can be found in Annex 2.

The report is structured as follows: Chapter 2 introduces the ESC and explores the line of reasoning that underlies the ESC; Chapter 3 analyses the added value of the ESC; Chapter 4 positions the ESC in relation to other EU programmes. Chapter 5 deals with the question concerning the complementarity to paid employment. Finally, Chapter 6 provides information on the conclusions and recommendations.

¹ Assessing the relevancy given the needs and its objectives, coherency with other EU policy interventions, conditions for an effective and efficient implementation, and its (EU) added value) (EC, 2015b).

2. INTRODUCTION TO THE EUROPEAN SOLIDARITY CORPS

KEY FINDINGS

- The ESC provides an overarching framework to better balance the supply and demand of volunteering possibilities. By doing so, the ESC aims to stimulate involvement in solidarity activities of young people (aged 18-30). In turn, young people can contribute to the challenges Europe is facing while simultaneously increasing their employability.
- The underlying assumption of the ESC is that through concentrating voluntary possibilities, and collectively brand the voluntary activities under one name, the supply and demand can be better matched. This leads to a higher number of young people involved in solidarity activities and higher quality of services, ultimately also creating to better outcomes.
- A concern relates to whether participating organisations are sufficiently engaged in the current framework.

2.1. The ESC, its actions, infrastructure, objectives and resources

The ESC has as general objective “to enhance the engagement of young people and organisations in accessible and high quality solidarity activities as a means to contribute to strengthening cohesion and solidarity in Europe, supporting communities and responding to societal challenges” (see Article 3 in EC, 2017c, p.25). It enables young people between the ages of 18 to 30 to partake in the following types of solidarity actions both across-borders and in-country:

- Volunteering placements: full-time unpaid voluntary service for a period of up to twelve months;
- Traineeship placements: period of work practice from two to twelve months, which is remunerated by the organisation hosting the European Solidarity Corps participant;
- Job placement: period of work from two to twelve months, which is remunerated by the participating organisation employing the European Solidarity Corps participant;
- Volunteering teams’ placements: placements allowing teams of European Solidarity Corps participants from different participating countries to volunteer together for a common objective;
- Solidarity projects: a local initiative for a period from two to twelve months, which is set up and carried out by groups of at least five European Solidarity Corps participants;
- Networking activities: allowing participants and organisations to build up their network.

Within the solidarity placements, the ESC has two strands, namely the volunteering strand and the job-related strand. In both cases, the ESC is not providing wages. For volunteering activities, it does, however, provide pocket money to support living costs. If the ESC concerns a solidarity job/internship placement, the participating organisation will have to provide wages/compensation.

Besides these solidarity actions, the ESC offers quality and support measures, including support for participants, quality labels for organisations, a Resource Centre, and a Portal and other online services.²

The ESC proposal opens participation to organisations in the civic, public and private sector (p.23). Attaining the European Solidarity Corps quality label is a pre-condition for participation. Organisations may then, in calls for proposals, submit proposals to offer placements to

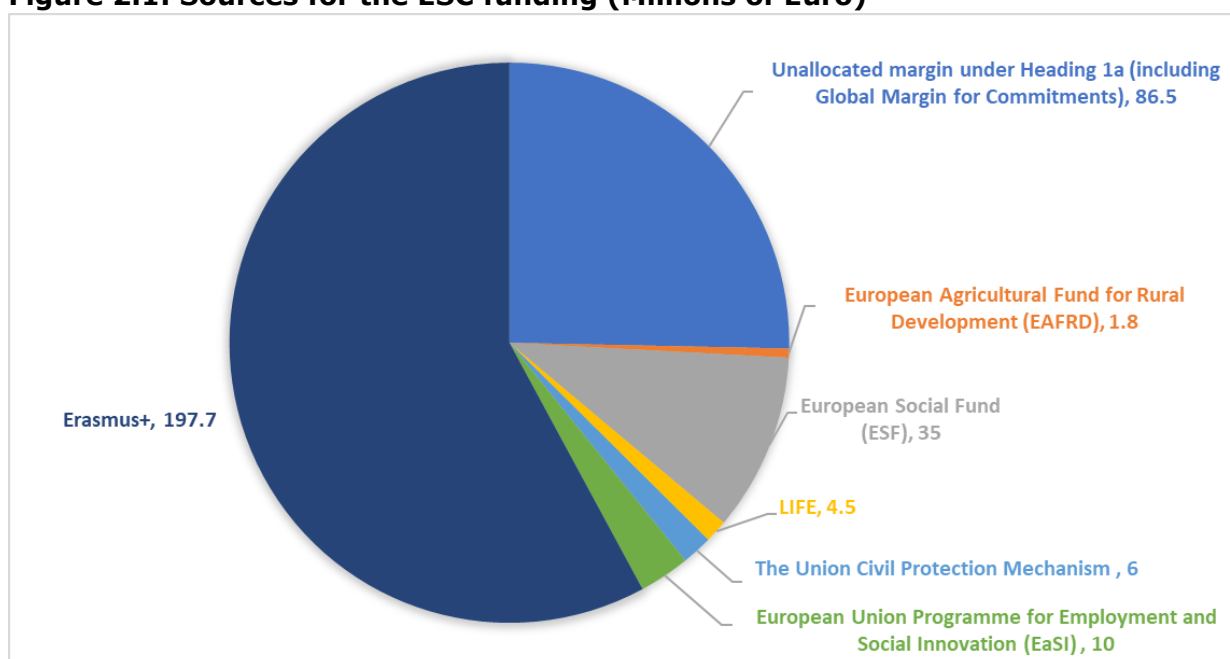
² These actions are further elaborated in articles 7 and 8 of the Proposal (European Commission, 2017c, p.26).

participants or implement other activities within the ESC framework. A large variety of organisations can participate in a set of wide-ranging activities.

The European Solidarity Corps will use the existing management and implementation arrangements already in place under the Erasmus+ programme (EC, 2017c, p.12). The European Commission (EC) will, at Union level, manage the new ESC programme. At EU level, a portal for young people and organisations is maintained, which matches supply and demand of solidarity activities between young people and organisations. However, National Agencies will manage and implement the programme, according to the same principles as the Erasmus+ programme (see article 20, p.31). This division of work means that the ESC will follow a similar executive scheme as the European Voluntary Service (EVS). The National Agencies are then responsible for reaching out to organisations and potential participants, selecting organisations and participants, and quality assurance. Moreover, the National Agencies carry responsibility for designating an independent audit body.

By 2020, the ESC envisions to meet its goal in placing 100,000 participants. To achieve this objective, the Commission seeks to implement the programme with a budget of EUR 341,500,000 in current prices, for the period from 1 January 2018 until 31 December 2020. As outlined in the Proposal, this budget would be formed by a contribution of six programmes (see figure 2.1 below).

Figure 2.1: Sources for the ESC funding (Millions of Euro)



Source: Proposal ESC, EC, 2017c.

2.2. A new initiative based on existing structures

Currently, there are several other Union coordinated and funded programmes that offer volunteering opportunities, such as the Erasmus+ programme, the European Social Fund and the Youth Employment Initiative. Solidarity, as a key principle in the European Union, has been promoted through these EU programmes.

By introducing a new initiative, the ESC seeks to build upon and extend beyond the initiatives that have been in place so far. As such, the ESC uses a similar structure to the EVS, but differs on some key distinctions as described in the below table. A significant difference is the broadening of the programme in terms of beneficiaries, actions and placement opportunities.

Thus, although the ESC is very similar to the EVS (which therefore forms a principal point of reference to evaluate and implement the ESC), it will also need to be evaluated in a broader context of volunteering and employment that exceeds beyond mobility and long-term volunteering.

Table 2.1: Comparative table of EVS and ECS legislative proposal: (cross-border) full-time volunteering

	EVS	ESC
Objective	To support young people's participation in various forms of voluntary activities, both within and outside the European Union. Under this Action, young people take part individually or in groups in non-profit, unpaid activities.	To enhance the engagement of young people and organisations in accessible and high-quality solidarity activities as a means to contribute to strengthening cohesion and solidarity in Europe, supporting communities and responding to societal challenges (Article 3 (general objective))
Context	Embedded in the Erasmus+ programme	Self-standing programme
Target group	Young person aged between 18 and 30 years old, supporting also the participation of disadvantaged young people	Young people aged 18 to 30 years old Focus on the participation of disadvantaged young people.
Types of actions	Cross-border full-time volunteer placement for a period ranging from 2 to 12 months.	Volunteering placements: full-time, for a period of up to twelve months; Traineeship placements: two to twelve months; Job placement: two to twelve months; Volunteering teams' placements: between 2 weeks and 2 months; Solidarity projects: local initiative, two to twelve month; Networking activities.
Financial support	It provides the reimbursement of travel expenses and complete coverage of the costs of food and accommodation.	The internship and job are remunerated by the host organisation. The ESC covers travel costs and additional expenses (for disadvantaged young people) in all types of placements. For volunteering placements additionally subsistence costs, including a pocket money are covered.
Quantitative objective/reach	Reached 100,000 in the period 1996-2016 (CHE Consult, 2017).	Offering 100,000 young people opportunities under the European Solidarity Corps by 2020.
Geographic scope	Global: in Europe, Africa, Asia or South America	All MS; the ESC is open for the participation of other countries on the basis of bilateral agreements. Volunteering takes place in an EU MS, either in another country or the volunteer's own country.

By including employment and non-mobile volunteering in its framework, the ESC extends beyond the EVS's matching abilities. While on national level there are also fora by which non-mobile volunteering is easily made available to young people, these models often include part-time volunteering. This latter type of volunteering is excluded from the ESC's scope.

To achieve widespread solidarity, the new programme aspires to widen its inclusivity for both participants and benefitting communities. Firstly, the scope of solidarity activities will be diversified, including also local initiatives and group projects, by which projects become more accessible. In this manner, there will be more projects for placements, as well as fewer boundaries for disadvantaged people, as these projects can also be carried out locally or self-initiated with friends. Secondly, the ESC offers increased (financial) support to disadvantaged participants, such as through offering supplementary pre-departure training and covering additional expenses (EC, Concept Note, 2017b).

2.3. The absence of a unified framework to balance demand and supply

In the proposal, the European Commission states that the "current 'landscape of solidarity opportunities' is fragmented across the EU. The disintegrated approach of both employment and volunteering activities has led to an unawareness of activity opportunities, community demands and supply, and overall shortcomings in terms of documentation and validation of progress" (EC, 2017c, p.3). According to the European Commission, this urges the need to take action to better match supply and demand.

According to the logic applied in the proposal, the absence of a unified framework with clearly outlined measures impedes bringing together the different actors in this demand and supply market for solidarity activities (mainly focusing on full-time, long-term and mobility volunteering), consequently creating a welfare loss for society at large.

Given this problem definition, the ESC's aim is then to provide a framework that motivates young people and organisations to engage in solidarity activities of high quality, promoting qualified skills and enlarging solidarity through Europe, while responding to societal needs. The initiative of the ESC consequently assumes that it is more cost- and result-effective to create a single overarching framework to better balance the supply and demand of volunteering possibilities than to expand the existing programmes, despite its similarities to the existing EVS/Erasmus+ structure.

This logic assumes that **through concentrating voluntary possibilities, and collectively brand the voluntary activities under one name, the supply and demand can be better matched, consequently leading to a higher number of young people involved in solidarity activities and higher quality of services. In this way, the ESC seeks to achieve better outcomes.**

Following the objectives in the proposal, the aim of the ESC is two-fold. Firstly, it seeks to better balance the demand and supply of volunteering activities (main organisational objective for the initiative). Secondly, the ESC aspires to increased involvement in the volunteering activities in general. As indicated in the proposal, these objectives subsequently also concern supporting participating organisations and increasing employability. The second objective remains the same whether the voluntary services are coordinated in different programmes or in a concentrated programme (the ESC). Hence, the focus in this analysis is on ESC's capabilities to better balance demand and supply, and accordingly, to contribute to an increase in the involvement in solidarity activities in Europe. It will not question (extensively) the value of volunteering per se.

2.4. Concerns related to the proposed structure

Are participating organisations sufficiently engaged in the current framework to:
i. uphold a commitment to quality and trust;

ii. ensure that the interests of both participating organisations and individuals are represented?***i. Uphold a commitment to quality and trust?***

A key aspect of the ESC programme is the renewed matching system. Contrary to the EVS programme, where participating organisations are mainly responsible for the matching of volunteers, the ESC's volunteer coordination is administered and overseen by the EC and NAs. In the former system, where the responsibility was placed with the organisations, participating parties indicated to have worked on a strong basis of mutual trust and commitment.³ Organisations trusted that their partnering associations were committed to uphold the quality of their work through the appropriate training of volunteers. This training and quality assurance is now the responsibility of the EC and NAs. Commitment to quality through continued trust is thus removed, and only incentivised through the obtaining of a quality label for organisations. The quality of the volunteer work itself is embedded in the trainings offered by ESC.

ii. Ensure that the interests of both participating organisations and individuals are represented?

Although different stakeholders have been actively engaged through consultation rounds before drafting the legislative proposal, it is unclear what their consulting and governing role will be during the execution of the ESC programme. This raises the question whether the interests of both organisations and volunteers are represented while setting up the ESC's framework.

Neither participating organisations nor the Youth Forum are currently included in the ESC framework, either as members of an advisory board or a representative to the Steering Committee. Similarly, social partners are not mentioned in the proposal, despite the ESC objective to integrate a work strand into the programme.

Likewise, there is no reference to how individual participants' and participating parties' interests and concerns will be represented and handled throughout the programme implementation. Experiences from other EU programmes, especially the EVS, have provided a framework by which these organisations can play a consulting and governing role. These frameworks also include provisions for evaluations and feedback from executive organisations. However, beyond evaluations and requested feedback, it remains unclear how participating organisations and participants can voice their comments and concerns. The governance role of participating organisations is then not clearly defined.

³ In the former structure, participating organizations would oversee the training of volunteers. The organizations would arrange for the matching of locally trained volunteers to participate in a cross-border project led by another participating organization. Because the matching took place between organizations, there was a secured level of trust and commitment to quality among the participating organizations.

3. ADDED VALUE OF THE EUROPEAN SOLIDARITY CORPS

KEY FINDINGS

- According to the Eurobarometer only a small percentage (ca. 6%) of young Europeans (ages 15-30) engage in formal, full-time, cross-border volunteering. Over a period of 15 years, this means that more than one million young people were engaged in international volunteering. In any given year, around 1.5 million young Europeans engage in a broader defined form of formal volunteering.
- Regardless of its form, volunteering supports the personal development of the volunteer, building a wide range of skills. Consequently, volunteering can have (indirect) effects on labour market entry perspectives.
- The ESC mitigates some of the identified barriers for individuals to engage in solidarity actions, especially concerning providing information, visibility and support for disadvantaged young people. Specific features of the ESC that reduce barriers for disadvantaged groups include: the possibility to participate in teams; to do in-country projects; and the extension of support services (provision of training, insurance and additional financial resources). Finally, by encompassing internships and jobs and in-country solidarity actions, the ESC also broadens the scope of the EVS.
- At an organisational level, the ESC imposes a quality label on organisations that are willing to participate. The introduction of this label can contribute to establishing a quality culture (if not already existing). In this manner, the ESC supports removing some of the challenges for attracting and working with volunteers and trainees at an organisational level. For instance, it could support organisations in providing clarity concerning rights and obligations, accountability and support structures.
- The ESC, compared to other forms of volunteering, can provide equal opportunities for all young people in the EU, regardless of the national opportunities. It also positions solidarity actions and volunteering at the heart of the European project and boosts the importance of solidarity across European borders.
- Concerns relate to whether the ESC will be able to deliver 100,000 solidarity activities in three years; and whether the ESC, through differentiating opportunities, will indeed lead to higher participation of disadvantaged groups compared to the EVS. In addition, there is a concern whether the ESC creates disparity between different volunteers involved in similar volunteering activities, but supported by programmes other than the ESC, e.g. national schemes or schemes offered by non-profit organisations.

3.1. Volunteering in Europe

Creating a unified European volunteer system is a challenging task. Member States have **different connotations of volunteering** (EC, 2017a, p.16; Broek, et al, 2017, p.20). In Spain, the Volunteering Law excludes so-called 'episodic' or isolated volunteer acts. Similarly, the Spanish law only recognizes unpaid work for an organisation that is legally considered as a non-profit. This means that unpaid labour for organisations with public goals is not acknowledged as volunteering. On the other side of the spectrum stands the UK definition of volunteering. Here it is not organisational form, but purpose and motivation that underlie the

legal description. The British connotation then emphasizes the function of volunteering as a tool for democracy and citizenship, while also being bound by the notion that it may not be used to generate income or financial benefit (Bekkers and de Wit, 2014, p.16-17).

Member States also have **different traditions in organising and facilitating volunteering activities**, whereby in some countries there is a preference for state intervention whereas in others, civic society is in the lead. For example, the Italian *Servizio Civile Nazionale* replaced the mandatory national military service and now functions as paid non-mandatory possibility to stimulate young people from the ages 18 to 28 years old to commit for one year towards solidarity activities (Integrazione Migranti, 2015). Moreover, several countries have **national volunteering or national service duty** by which young men can choose between doing military service and volunteering several months. In Greece, for example, conscription for young men in between the ages of 16 to 45 has a minimum of 9 months. In other MS volunteering is not state-organised and many different organisations (working in association) are engaged with offering volunteering opportunities, such as the National Council of Voluntary Organisations (NVCO: UK) and Bundesarbeitsgemeinschaft der Freiwilligenagenturen (BAGFA: DE). In addition, there are religion-based volunteering associations such as Caritas active in volunteering.

The Flash Eurobarometer 'European Youth' 2015 (TNS, 2015) concluded that **around one young (aged 15-30) European in four** has engaged in an organised voluntary activity (formal volunteering)⁴. Attempting an estimate on the population aged 15-30 in EU28 (EU, 2015), it can be concluded that around 22 million young European have been engaged in volunteering; when broken down per year it is estimated that approximately a total of **1.5 million young people** are engaged in volunteering in a given year (Broek, et al. 2017).⁵ An analysis of the national surveys and reports on volunteering identified by key stakeholders in the Member States indicates that there are around 92 to 94 million adults involved in volunteering in the EU (GHK, 2010).

Compared to formal volunteering (organised voluntary activity) only a small number of young Europeans engages in **cross-border volunteering**. The Eurobarometer indicates that only 6% of young people (within the age group 15 to 30-year-olds) say that they have volunteered abroad at some point (TNS, 2015, p.4). Although it is not a lot compared to the 1.5 young people that volunteer every year, this still means that more than a million young people were engaged in international volunteering in approximately 15 years.⁶ This cross-border volunteering takes place through the EVS but there is a plethora of other opportunities provided by non-profit organisations to volunteer abroad. Furthermore, there are websites offering overviews of all possibilities.⁷

3.2. Added value of solidarity actions

Volunteering can have many positive effects. A key development area in volunteering is the **personal development** of the volunteer (IVR, 2014). For instance, volunteering has been linked to gaining confidence, autonomy, and self-esteem and learning new transversal skills, such as organisational skills, communication, group work skills (Arches and Fleming, 2006; Drever, 2010; Low, et al., 2007; Taylor, et al., 2003; Youth Agency, 2008; IVR, 214), self-organisation, self-management, personal management, learning to learn, and digital learning. Other skillsets include social competences (i.e. participation and civic competences, leadership

⁴ This includes two main areas of focus: charity, humanitarian and development aid; and education, training and sport.

⁵ The 22 million young people cover the age group 15-30 year olds. The data collection therefore covers involvement in volunteering over the last 15 years. When broken down for one year, the involvement is 1.5 million young people.

⁶ 6 % of the 22 million young people = 1.3 million.

⁷ See for instance: <https://www.gvi.co.uk/volunteer-abroad/>; <https://www.volunteerhq.org/>

competences); and intercultural competences (i.e. awareness of diverse cultures and backgrounds, openness and tolerance, and language skills) (Siehr and Raschdorf, 2015). Some studies suggest a link between higher participation in volunteering and higher well-being (decline of depression and social isolation) (Plagnol and Hupper, 2010; StreetGames, 2014; Itstat, 2014).

Labour market entry is not usually the primary objective when engaging in a volunteering position. People participate in volunteering to support their sport club, a local initiative, a good cause, etc. For people at distance from the labour market, volunteering can be used to help them gain confidence, a (renewed) work rhythm and an increased network – this could eventually lead to employment. Some evidence indicates increased odds of employment and interesting unintended side-effects because of volunteer work (Spera, et al., 2013). For instance, employers report being positive towards young people's volunteering experiences in job applications (European Youth Forum, 2012). Although volunteering is not seen as a learning trajectory and often the learning objectives are not specified beforehand, evidence shows that volunteering helps unemployed people to gain competencies, contacts and thus it can be a stepping-stone towards paid employment (Hirst, 2001; The National v, 2008 in IVR, 2014). Volunteers, including long-term volunteering, acquire new skills and practice the skills they have, especially when they volunteer in a sector in which they have no prior experience. In addition, new transversal skills (e.g. leadership, team-work ability) are likely to be of use in the labour market. Volunteering provides an opportunity to test out potential careers prior to choosing their education and training path (GHK, 2010). Another possible benefit of volunteering is that organised voluntary activities favour the development of a network of relations and an increase in social relationships. National sources, such as a study based on the British Household Panel Survey show a mixed picture: volunteering may have a positive effect on the labour market position of some individuals in some circumstances; for others it may have a negative, or no effect (Paine, McKay and Moro, 2013, p.22). "For young people and students in particular, and if done too frequently, [...] volunteering can have a negative effect on the move into employment and on earnings" (p.15).

The EVS impact study (2017) demonstrates that participants in long-term and mobility volunteering feel that their languages skills, both in the local language as well as in English, and knowledge about and interest in other countries and cultures has increased. The study continues that also participants' perspectives and ways of thinking about other countries, as well as their understanding of the struggles of other societal groups have changed. Consequently, EVS participants have become more mobile. These skills and mind-set add to their employability. Moreover, long-term volunteering programmes can be beneficial to help identify opportunities for their professional future and help to enter the job market. Mobility programmes prepare participants for an international career path. Long-term programmes, such as the EVS, also cultivate entrepreneurial skills (CHE Consult, 2017, p.96-97).

In addition to the added value for individuals, volunteering has evidenced impact on societies. To mention only a few impact areas, volunteering contributes to strengthening social connections; building strong, safe, cohesive communities; enhancing civic engagement; and delivering public goods and services (Huizinga, 2011; Putnam, 2000; Putnam and Feldstein, 2003).

3.3. Challenges related to solidarity actions

Individuals can face challenges in getting engaged in (full-time and long-term) volunteering. These challenges include⁸:

- Dispositional barriers⁹: not being asked; not feeling connected to the mainstream community; not a culture of volunteering; feeling too young; lacking the necessary skills; prejudices play in discouraging individuals from volunteering (CEV, 2006).
- Situational barriers: lack of time; not knowing any opportunities; not knowing of any groups needing help; lack of funding.
- Institutional barriers: no volunteering opportunities available; no organisational capacity to support volunteers. The 2010 study for the European Commission on volunteering refers to challenges concerning engaging volunteers; the increasingly professional nature of personnel employed in the not-for-profit sector;¹⁰ the lack of clear legal framework or clear rules; providing insurance to volunteers; the lack of information and data; the lack of national bodies/agencies to coordinate volunteering; lack of funding for those voluntary organisations which work with jobseekers and unemployed people to help improve their skills and employability (CEV, 2007); the lack of national systems promoting recognition in volunteering; and the lack of government policy or strategy on volunteering.

Specific **challenges for cross-border volunteering** concern quality in volunteer management, availability of information, access of disadvantaged young people, visa issues, linguistic support, insurance and protection, and simplification of application procedures (ICF, 2016, p.95).

Specific mentioning should be devoted to research findings related to **volunteering and social exclusion** (see box).

"Factors related to broader exclusionary processes and social, human, cultural and economic capital have been identified in the research literature and survey data as key to participation in volunteering. The literature suggests that while volunteering is a mechanism for individuals to boost their personal, social, financial and cultural resources to overcome exclusion, volunteering also consumes one's resources. This means that those with less personal and social resources are less able to volunteer and gain the associated benefits" (Southby and South, 2016, p7).

The EVS impact study also indicates that, although participants felt that they had developed their skills, most participants already had a substantial skillset and high favourable personality traits (CHE Consult, 2017, p. 96.). While the EVS aimed to target young people of disadvantaged backgrounds ever since its establishment, the 2017 impact study shows that only "a minority of the EVS volunteers consider themselves being disadvantaged" (p.57). The Eurobarometer 408 concludes that more than two in five (44%) volunteers have incurred expenses as part of the voluntary activities they have done, and one in six respondents (16%) say that they have received contributions for expenses (2015, p.4). This suggests that volunteering is less accessible to young people from a disadvantaged socio-economic background. To ensure social inclusion requires support that exceeds solely financial support and accessibility.

⁸ Compiled based on various sources: UK Civil Society Almanac 2014 (2014); Human Sculptures (2013); Southby and, South (2016); and TNS Flash Eurobarometer 408 (2014).

⁹ The distinction between dispositional, situational and institutional barriers emerged in the adult learning literature (Knowles, 1970).

¹⁰ As indicated in the report: "volunteers find themselves working side-by-side with newly employed paid professionals, recruited on the basis of specific competences. This means new challenges in terms of management of human resources" (GHK, 2010, p.229).

Solidarity oriented organisations can face various barriers for engaging in volunteering or in working with volunteers. These concern for instance that there is a lack of clarity on the rights and obligations for volunteers; lack of accountability to volunteers; lack of support structures for volunteers; lack of funding to support volunteers; lack of capital and funding to train and supervise volunteers; lack of funding or capital to support volunteer administration; lack of clear set of tasks that volunteers could do; and missed opportunities to capitalize the skillset of volunteers (Deloitte Development LLC., 2006; Hager and Brudney, 2004, p.3). In addition, (non-profit) organisations struggle with volunteer management and recruitment costs. Recruiting enough, but not too many, qualified and available volunteers is a costly and time-consuming process. Finally, there is always a threat that organisations use volunteers to replace paid employment (see Chapter 5).

Offering transnational solidarity activities adds (besides funding issues) another set of problems for organisations, such as the challenge to improve cooperation and coordination, not only to regarding relationships between public authorities and the organisations, but also the coordination between organisations (TransSOL, 2016).

3.4. ESC response to challenges

The type of solidarity actions targeted by the ESC (long-term, full-time and cross-border volunteering), based on the experience with the EVS adds value to communities by bringing in an EU perspective; encourages young people (participants to EVS and beneficiaries of solidarities actions to go abroad (Che Consult, 2017). In the design of the ESC, lessons have been learned from the recently published EVS impact study (ibid.) and it tries to mitigate some of the barriers **for individuals** identified, especially concerning providing information, visibility and support for disadvantaged young people. The ESC provides preparation, training and certification of the individual participant. Moreover, the ESC's alumni network will provide a platform to keep maintaining networks build that could be useful later in life. Finally, the ESC broadens the scope of the EVS to internships and jobs on the one hand, and on the other hand provides possibilities for in-country solidarity actions. Specific features that reduce barriers for disadvantaged groups concern the possibility to participate in teams; to do in-country projects; and the support services (provision of training, insurance and additional financial resources).

At an **organisational level**, the ESC introduces a centralised matching mechanism by which it is believed the supply and demand in solidarity actions can be better matched. It also imposes a quality label on organisations that are willing to get involved. Without a quality label, organisations will not be registered and will not be ineligible for participation. The introduction of the quality label can then be an instigator for organisations to adhere to the EU requirements. In this way, the label can have a positive effect at organisational level and contribute to establishing a quality culture (as far as this was not in place already). Through this label, the ESC also reduces some of the organisational challenges, which are identified in the previous section. Furthermore, the ESC and the quality label could support organisations in providing clarity concerning rights and obligations, accountability and support structures. Moreover, the ESC portal also alleviates some of the organisational burdens in reaching volunteers.

The ESC, compared to other forms of volunteering, can provide **equal opportunities for all young people in the EU**, regardless of the national opportunities. It also positions solidarity actions and volunteering at the heart of the European project and boosts the importance of solidarity in Europe. On the one hand, the ESC added value runs counter to the strict definition

of European Added Value¹¹ by offering something that can be provided by individual Member States as well. On the other hand, a strong aspect of the ESC is that there is a European dimension in all solidarity actions, regardless of whether they are cross-border or not: through solidarity actions, the ESC contributes to a more coherent European community.

3.5. Concerns related to the added value of the ESC

Besides the contribution of the ESC to the volunteering landscape (for individuals and organisations), this assessment identified some concerns which need to be taken on board in the further discussions concerning the added value of the ESC.

Will ESC be able to deliver 100,000 solidarity activities in three years?

Compared to the overall volunteering of young people taking place, the contribution of the ESC, with its objective of 100,000 participants in three years, is modest. When looking more closely to long-term, full-time and cross-border volunteering (i.e. EVS), the ESC is highly ambitious. The EVS reached 100,000 participants in more than 20 years. It is evident from the demand for the EVS services that project demand outgrew the supply in project funding. It can safely be assumed that there will be an increase in projects that will be financed with more financial supplies available. However, the current ESC proposal does not sufficiently explain how the ESC will be able to reach 100,000 solidarity activities in three years and how it will be able to find sufficient quality participants and participating organisations to satisfy this goal. Around one-third of the EVS project applications is granted funding, which is similar to those for VET mobility and more compared to the adult learning mobility projects (EC, 2017e, p.30). This does not mean that all project applications are of sufficient quality. Furthermore, it is not clear what the effect is of the introduction of the quality label on organisations' interest to offer volunteer places. Perhaps their interest decreases (compared to what we used to know from EVS). In addition, the placement depends on a matching of the supply of people willing to undertake solidarity activities and the demand for those people. This relies on whether the participants find the placements of interest and whether the organisations find the participants they need. Therefore, one would need more than 100,000 people being interested and more than 100,000 placements to make the matching.

Does differentiating opportunities lead to higher participation of disadvantaged groups?

The ex-ante evaluation (2017a) does not provide proof that diversifying solidarity activities will lead to an increase in placements or youth engagement. The ex-ante evaluation has not accounted for other possible limiting reasons for disadvantaged youth not to participate in solidarity activities beyond geographical and financial boundaries, such as lost opportunity costs. Similarly, it has not been accounted for how many of disadvantaged youths currently participate in non-cross border and non-EU initiatives. Neither is the proposal clear on how different types of 'disadvantage' are classified and what obstacles and needs are connected to each specific disadvantage.

The pool of participants affects the success of the ESC in breaking the Matthew-effect of accumulated advantage, related to skill development in volunteer work. Without a diverse pool of participants, including a vast group of young people from disadvantages backgrounds, the Matthew-effect, in which those who have opportunities gain more opportunities, will be sustained.

¹¹ European added value "is additional to the value created by actions of individual Member States. It may result from different factors, e.g. coordination gains, legal certainty, greater effectiveness or complementarities. It reflects broader European relevance and significance of the action with a view to presenting models and mechanisms which can be applied not only regionally or nationally but also EU widely"-
http://ec.europa.eu/chafea/documents/health/hp-factsheets/added-value/factsheets-hp-av_en.pdf

The current framework of the ESC might fall short in overcoming the barriers that prevent those who would most benefit from the opportunity to participate in volunteering (dispositional barriers). With the current regulations, as described in the proposal, there is a risk that the initiative will not reach disadvantaged youths. While Article 12 specifically requests that the Commission and the participating countries ensure to promote social inclusion, there are no specific guidelines on how to ensure social inclusion. There is no specific outreach plan beyond existing communication channels. However, a “broad range of solidarity projects, as well as efficient information and awareness of these opportunities, is crucial to increase the motivation particularly among disadvantaged youth” (EC, 2017a, p.12). Hence, for specific target groups, a more pro-active approach must be adopted. The Erasmus+ programme has established the SALTO-YOUTH network. Despite not being explicitly mentioned, it is likely that the ESC will incorporate a similar resource for participants’ support and evaluation. It remains, nevertheless, questionable how the ESC will be more effective than preceding programmes in including participants from disadvantaged backgrounds and uphold an inclusive outreach. Similarly, it is unclear how the new matching system will enable different ‘disadvantaged’ applicants to participate. Will disadvantaged applicants receive additional support and training by default, or will they receive additional support after being matched? Given that the matching will ultimately still be done by participating organisations who offer placements, or will be based on group projects, it is questionable whether the new matching tool will increase placements for applicants from disadvantaged groups, even if the ESC will receive more applications from this applicant group.

Likewise, the proposal does not touch upon the form of support organisations will be offered in including participants from disadvantaged backgrounds. Outreach and funding are vital components to opening the ESC up for a wider pool of participants. Nevertheless, it is of equal importance to aid organisations aided in absorbing these participants into their organisations beyond monetary support.

As the ESC deliberately aims to be accessible for all, it should clearly reach out to disadvantaged groups and monitor whether the programme is successful in involving them in solidarity activities.

Does the ESC create disparity between different volunteers in the same or similar programmes?

The ESC aims to create a cohesive framework by which the qualifications, funding and support over different EU coordinated programmes are equalized. In doing so, the ESC aims to also offer more training and post-return support to individual participants than similar EU-led programmes previously provided. Participants will be able to record and evidence these trainings by means of an ESC certificate. Volunteers who are not ESC-funded, but who work within the same organisation or on similar projects or positions, may demonstrate equal, similar or excelling skills and expertise. Yet, they will not be granted a certificate by which they can officially record their skills or their certificate may be less valued. Equally, non-ESC volunteers will not (necessarily) have access to the same resources, while they are tasked with the same or similar responsibilities. This creates unfair competition between volunteers who carry out comparable tasks or demonstrate equivalent abilities. On the one hand, by offering additional services, the ESC sustains and adds to the disparity between EU coordinated programmes and non-EU programmes. On the other hand, by merging the different programmes into a singular, decentralised programme, the ESC also creates more visibility on how it can function complementary to national and local initiatives.

It also could lead to a hierarchy in participation in voluntary programmes whereby young people prefer to engage with cross-border volunteering as offered through the ESC at the expense of nationally led schemes. This jeopardizes the contribution that in-country

volunteering makes to a solidary Europe, which is often greater than that of cross-border volunteering. In-country volunteering can bring young people together in their neighbourhood, city, region, country to respond jointly to unmet societal needs. It can change the fabric of the society more profoundly, as it might change the mind-set of those involved (the volunteers) who are also members of that society. In international volunteering, the volunteers support a community in another country after which they return home, having no direct impact on his/her own community.

4. THE ESC AND HOW IT IS POSITIONED IN RELATION TO OTHER EU PROGRAMMES

KEY FINDINGS

- The ESC integrates the objectives related to mobility actions in solidarity of the preceding programmes and opens possibilities that did not exist before. It is unclear how synergies between the ESC solidarity actions and the broader programme objectives of the preceding programmes are ensured.
- The ex-ante evaluation opted for policy option 2 (self-standing programme) as the preferred implementation modality. This is in line with the preference of many stakeholders who consider it sensible to better integrate the different solidarity-related actions and programmes in one programme. However, the conclusion of the ex-ante evaluation to rule out policy option 1 needs further motivation and argumentation. Especially the option to integrate the ESC under Erasmus+ (which is not considered properly) needs to be further investigated.
- There are concerns related to whether it is sufficiently clear what additional responsibilities and accountability are involved in establishing a European quality label; whether the NAs have sufficient resources to implement the programme; how funding is distributed at MS level; and finally, how the programme will be monitored in relation to the programme's objectives.

4.1. Maintaining objectives of preceding programmes of the ESC

By concentrating efforts, the ESC envisages to be better able to stimulate solidarity activities of young people; offer more (and different) opportunities; better match supply and demand; and provide better support services (insurance, quality, training etc.). The ESC concentrates the solidarity activities of different programmes under one umbrella. These existing programmes have broader objectives and often only refer to the options and contributions of solidarity activities in reaching the objectives in a limited way.

The ESC will still contribute to the stated objectives of the supporting programmes. For instance, it is expected that the solidarity activities (mobility, projects) will cover the areas supported by the LIFE programme, or the Union Civil Protection Mechanism. The ESC does not specifically target the objectives of these programmes and assumes that the whole body of solidarity activities will cover the topics of the preceding programmes anyway (disaster reduction, environment, health, social inclusion etc.). If specific topics are not covered, the ESC can launch yearly calls for proposals focusing on these shortage topics through its steering mechanisms, which are similar to those of the Erasmus+ programme. However, no systematic monitoring on this aspect is foreseen.

Related to all previous programmes, the ESC is most similar to Erasmus+ programme. The Erasmus+ programme through the European Voluntary Service most explicitly refers to the role of volunteering. It does so in a trans-national manner, as Erasmus+ is in principle a mobility programme covering the areas of education, training, youth and sport. Aspects that were not implemented in the Erasmus+ programme (although they were discussed in the negotiations on the Erasmus+ regulation) are now integrated in the ESC proposal. These concern, for instance, offering the possibility of in-country volunteering (i.e. not a necessity to go abroad for solidarity actions) and (group-)project volunteer work.

In relation to the preceding programmes, it remains questionable to what extent what ESC activities will cover the stated objectives of the programmes that financially contribute to the

ESC. Moreover, it is unclear how synergies between the ESC coordinated volunteering activities and the other programme-activities are maintained.

4.2. Reviewing the policy options: reconsider a third option?

The modality that was chosen for the ESC needs to be critically assessed. The ex-ante evaluation presents, after elaborating on the problem analysis and objectives of the ESC, two policy options for the delivery mechanism. These two options are analysed based on accessibility, quality, inclusiveness, synergy and efficiency and simplicity of management provisions and low administrative costs (EC, 2017a, p. 22-23):

- Policy Option 1: Continuation of implementation through various spending programmes (baseline scenario); and,
- Policy Option 2: Self-standing programme with strengthened focus on solidarity.

One option that is discarded very early in the process is to integrate the ESC under the Erasmus+ programme. It was assessed that integrating it within Erasmus+ would make the Erasmus+ regulation too complex and would not support the visibility of the ESC. These two motivations can be critically assessed:

- The argument concerning the **complicated nature** does not appear to be very strong. The Erasmus+ programme is responsible for 58 per cent of the total ESC budget. Additionally, the ESC uses the same implementation structure as the EVS, relying on NAs. The fact that the ESC is not solely about mobility should not be problematic to integrate it in the Erasmus+ programme as of the total of 100,000 participants only 15,200 will participate in the in-country solidarity projects (EC 2017c, p.55). This in-country part of the ESC can hardly be considered the core-element of the programme.
- The **visibility argument** can also be countered. In the negotiations for the Erasmus+ programme, the visibility and branding argument was one of the arguments to merge the preceding programmes under one umbrella.¹² The other programmes (and sub-programmes) would benefit from the strong brand name of Erasmus. The same could apply to the ESC; it could benefit from the branding of Erasmus (especially when it concerns cross-border solidarity activities).

The ex-ante evaluation preference for policy option 2 as implementation modality resonates stakeholder's desires to better integrate different solidarity-related actions and programmes in one programme (EC, 2017a). Nevertheless, it is unclear why this integration could not have taken place under Erasmus+. The conclusion of the ex-ante evaluation then needs further motivation and argumentation, especially in relation to the option to integrate the ESC under Erasmus+, which has not been considered in full.

4.3. Concerns related to the practical implementation

The current proposal still leaves several issues open. Some of these issues are of high importance in having a good understanding of the ESC programme. These issues are discussed here below:

¹² Already at an earlier stage, different programmes were integrated as sub-programmes under the Lifelong Learning Programme (i.e. Grundtvig, Comenius, Leonardo da Vinci, Erasmus).

Will the creation of a European quality label create additional responsibility and accountability?

The ESC will offer a quality Label to participating organisations. There is, however, no clear framework as to when an organisation qualifies for this label, or who carries the responsibility for the label.

The concept note clarifies that there will be a periodic re-assessment and assessment in case of complaints by participants or third parties. Consequently, organisations may or may not lose their status of “qualified” organisation (EC, 2017b, p.12). However, without a clear definition of when organisations do and do not qualify, it is impossible to check whether organisations meet and maintain the conditions for the label.

Moreover, lacking a framework can easily result in misuse or wrongful use of the label. Especially with a wide variety of organisations that can apply as a participating organisation, overview can easily be lost. Organisations may then extend to use the label as a marker of their Corporate Social Responsibility.

There is also a larger question of accountability in case of misuse of the label or (power-) abuse within the participating organisation. Although organisations carry responsibility, the EU may be held accountable for misuse and abuse of either the label or volunteers. In 2009 The US Peace Corps, a scheme similar to the ESC, experienced a serious lack of internal controls and breaches of security protocols. Because of this lack of controls, the Corps was unable to prevent the murder of Kate Puzey, a Peace Corps Volunteer who served in Benin, just after she reported concerns that a seasonal Peace Corps contractor was sexually abusing students (Peace Corps Office of Inspector General). Evidentially, questions of accountability will continue to exist in any programme where an organizing, governing body assume responsibility for participants other than the organizers themselves. However, even if jurisprudentially the EU may not be held accountable, in the eye of the public guilt by association may be a deterrent for future participants. In any case, the juridical liability of supplying this label remains unclear.

Implementation reliant on Erasmus+ infrastructure: Do NAs have sufficient resources?

Within the budget EUR 15.311 million is foreseen as management fee for the NAs for three years (estimated average per NA per year is 182,273 Euro). With this budget, the NAs have to organise national outreach, calls for proposals, assessment of proposals, providing tailored services to organisations and young people, provide the quality labels and report to the Commission. There are separate budgets calculated for i) solidary placements, projects and networking activities; ii) quality support measures –including training services, online support and quality labels; and iii) horizontal activities and costs. Although the NA management fee is categorized under the horizontal subdivision, in the absence of a clear description of what each of these categories entails, these services are likely to also partly cut into the Management fee budget. For example, it is not specified in the Annex which amount is specified for the Management of the quality Label and under which subdivision this is categorized. It is unclear which aspects of service costs fall under which budgets and what services the Management Fee itself in- and excludes.

Moreover, the workload of the implementing bodies (EACEA and NAs) might be challenging on several aspects of the ESC:

- The document accompanying the proposal (Concept note – main actions implementing the European Solidarity Corps) indicates that the **European Solidarity Corps quality Label** is attributed by a National Agency (NA) or by the Education, Audiovisual and Culture Executive Agency (EACEA). The label awarding agencies will follow a procedure

that foresees, where appropriate,¹³ 1) the assessment of information provided by the organisation through a form, and 2) an on-site visit to the organisation offering placements - to the intermediary organisation applying for a quality Label on behalf of other organisations - to further assess whether appropriate qualitative standards are in place. The modalities for attributing a quality Label may differ according to the profile of organisations wishing to be involved in the European Solidarity Corps. Simplified procedures may be applied for organisations already participating in other EU programmes and funds and for public authorities (EC, 2017b, p.12). There is no further information available on the quality label and the procedure for obtaining it. For the procedure to be perceived as reliable, the workload for both the EACEA and NAs might be extensive.

- The ESC consists of many short-term volunteering and placements and small-scale projects. Within this wide framework, all applications need to be assessed and judged accordingly. In addition, the ESC contains tailored provision such as insurance and training. Arranging this for 100,000 envisaged participants could lead to a heavy workload. The NAs already have experience with the EVS and other Youth work initiatives, but the scale of the ESC exceeds this.

In the Erasmus+ programme some of the activities can be provided by organisations operating in the often-well-structured education and training market (such as higher education institutes). Although this infrastructure might be less developed in the solidarity sector, this framework could be adapted or extended to this sector. Additionally, as 'solidarity activity' and 'participating organisation' are very loosely defined (Article 2 in EC, 2017c, p.23), the quality label does, in principle, not exclude any type of company or organisation.

Distribution of funding at MS level: what funding is allocated per MS?

The ESC proposal does not provide an indication of how the budget and activities within the ESC are distributed across the MS. This is unlike the Erasmus+ regulation (EC, 2013), where there is information on how funds are distributed. Article 18 (point 7) of the Erasmus+ regulation indicates that the funds for the learning mobility of individuals shall be allocated based on population size and cost of living in the Member State, distance between capitals of Member States and performance.¹⁴

Although the distribution of budget across MS seems to be based on a similar methodology as Erasmus+, the absence of concrete information on this for the ESC makes it challenging to see on what basis solidarity activities are distributed across the MS and to what extent the distribution considers different country-specific needs.

One key element of the ESC is the matching function between supply and demand of solidarity activities. This matching procedure is not yet further developed and hence does not specify on which criteria decisions are based or how the programme allocates imbalanced application numbers from countries.

How will the ESC assess its achievements without a clearly defined monitoring framework?

According to the explanatory memorandum, the monitoring and evaluation arrangements of the European Solidarity Corps will consist of permanent monitoring to assess progress and an evaluation to assess the existing evidence on the effectiveness of the results achieved. The proposal indicates that the extensive analysis will be based on both the quantitative outputs

¹³ 'Where appropriate' is however not defined further making it unclear when for instance on-site visits are required and when not.

¹⁴ The performance parameter shall account for 25 per cent of the total funds (Article 18, point 7). The criteria used to measure performance shall be based on the most recent data available and shall focus in particular on: (a) the level of annual realised outputs; and (b) the level of annual payments realised (Article 18, point 8).

and qualitative outcomes of the programme. The quantitative outputs will be systematically collected through the IT systems put in place for the management of the actions of the European Solidarity Corps. The qualitative outcomes will be monitored through periodical surveys targeting both individuals and participating organisations (EC, 2017c, p.12-13).

Currently however, the proposal does not outline any indicator for qualitative measurements or quantitative measurements, except for the number of placements it wants to offer. Instead, an elaborate set of monitoring indicators (including result and impact indicators) is to be developed within six months after entry into force of the Regulation (Article 15.2, p. 29). Yet, indicators need to be in place when the Regulation enters into force in order to make data collection effective and ensure “permanent monitoring” (p.12; p.44). Moreover, quality audits must be carried out with clear indicators that are measured uniformly across all projects.

Given the EC’s preference for a flexible legislative statute that can be shaped through execution, the creation of an assessment mechanism is especially important. Currently, definitions are purposefully broadly described and left open to interpretation in order to better adjust to market demand in the executive phase. It is vital that monitoring follows if and how the broad scope of the ESC impacts the existing solidarity activity market.

The set-up of indicators is a lengthy process by which there needs to be agreement of which indicators to include. The ESC builds on the monitoring and quality assurance of the Erasmus+ (p.44). Given the similarity of its aim as well as evaluation and audit system, the indicators outlined in Regulation (EU) NO 1288/2013 can serve as an inspiration for setting up relevant indicators for monitoring the ESC.

Given the objective of the ESC, thoughts could be given to the following directions for indicators (table). Although there is no apparent need to earmark funding related to the preceding programmes, the monitoring system needs to be equipped to assess whether the ESC activities sufficiently cover the specific topics and themes of these programmes. Additionally, quality and satisfaction of participants, both individuals as organisations, meeting societal needs, inclusion of disadvantaged groups, and matching efficiency should be taken into consideration for evaluation: Assessment tools should thus also measure the ESC’s qualitative impact. Moreover, with its key objective to improve European Solidarity, the ESC is also tasked with defining an indicator to measure the impact of the programme on European Solidarity – especially in comparison to other programmes and initiatives.

Table 4.1: The ESC objectives and indicators

Objectives	Indicators related to output	Thinking points related to result and impact
Article 3 (general objective) to enhance the engagement of young people and organisations in accessible and high-quality solidarity activities as a means to contribute to strengthening cohesion and solidarity in Europe, supporting communities and responding to societal challenges.	<ul style="list-style-type: none"> • Total number of individuals engaged in high quality solidarity activities • Total number of organisations engaged in high quality solidarity activities • 	<p>Attitude of participants concerning solidarity and cohesion (surveys amongst participants)</p> <p>More broadly linking the ESC to developments in society towards cohesion and solidarity. Regional differences related to whether ESC projects were conducted. Survey the development of (a feeling of) solidarity in Europe and increased participation in volunteering and democratic life.</p>
Article 4 (specific objectives) to provide young people, with the support of participating organisations, with easily accessible opportunities for engagement in solidarity activities while improving their skills and competences for personal, educational, social, civic and professional development, as well as their employability and facilitating transition into the labour market, including by supporting the mobility of young volunteers, trainees and workers	<ul style="list-style-type: none"> • Total number of participants gained skills and competences for personal, educational, social, civic and professional development. • Total number of participants improved chances on the labour market. • Total number of participants that come from disadvantaged background. • Total number of participants that increased their network. 	<p>Comparing how participants and non-participants (also from disadvantaged backgrounds) developed their skills and labour market transitions.</p>
Article 4 (specific objectives) to ensure that the solidarity activities that are offered to the European Solidarity Corps participants contribute to addressing concrete, unmet societal needs and strengthening communities, are of high quality and properly validated.	<ul style="list-style-type: none"> • Coverage of specific topics in the solidarity activities (placements and projects). • Total number of organisations that improved physical, human, economic, social and cultural capital. 	<p>Map unmet societal needs and how the ESC addresses those. Map strengths and weaknesses of communities and how the ESC contributes to strengthen them. Measuring whether the quality label leads to improvement of the quality of the organisation.</p>

5. COMPLEMENTARITY TO PAID EMPLOYMENT

KEY FINDINGS

- There are threats associated with volunteering regarding the replacement of paid employment. Misuse of volunteering is more likely in unregulated and uncontrolled environments.
- Currently, the ESC's checks and balances are insufficiently developed to establish the regulated and controlled environment to prevent replacing paid employment. Concerns are that the solidarity aspect in the definition of 'solidarity activity' remains undefined; and that the quality label lacks regulations to prevent replacing paid employment.

5.1. General discussion on solidarity activities and paid employment

There is limited data available to assess whether volunteering is replacing or displacing regular paid employees. Nevertheless, this issue has been associated with initiatives that stimulate volunteering (Steele, 2011, p.5; Blackadder and Jackson, 2011; the Guardian, 2011; Duguid, Mündel and Schugurensky 2013). There are academic studies that do not find evidence for a replacement of paid personnel by volunteers (Brudney and Gazley 2002), but Simmons and Emanuele (2010) on the other hand find that a higher minimum wage in a state is associated with a higher supply of volunteer labour. From this they infer that volunteers replace workers who work on minimum wages. They support the view that "organisations that use volunteer labour view them as substitutes to lower paid labour, and would increase the use of volunteer labour as the minimum wage increases" (p.73). In addition, Handy, Mook and Quarter (2008) found evidence in Canada that volunteers were replacing paid staff and that paid staff were replacing volunteers, sometimes in the same organisation. Bittschi, Pennerstorfer and Schneider (2015) studied non-profit organisations in Austria and found evidence that under the threat of competition and austerity measures, organisations working with volunteers are more likely to lay off paid employees; volunteers in organisations facing increased competition may be used in order to replace paid workers. The European Parliament study on "Skills development and employment: Apprenticeships, internships and volunteering" concluded that internships and volunteering are less regulated compared to apprenticeships and offer less secure working and learning conditions for participants. Internships are also seen as a source of cheap labour for employers and as (self)sustained by a lack of job-openings that 'force' young people into a series of unpaid internships or volunteering schemes (Broek, et al., 2017, p.78). There are hence indications that volunteering poses a risk to the replacement of quality jobs by unpaid work (European Youth Forum, 2016; Dima, 2015).

5.2. Assessment of complementarity of the ESC in relation to paid employment

Would misuse and replacing paid employment also take place in the EVS and ESC? Misuse of volunteering is more likely in unregulated and uncontrolled environments. That is to say, when the agreement is solely made between the young person and the organisation without oversight of a third party (this can be an education institution; Public Employment Service; another organisation) (Broek, et al., 2017, p.78). As the EVS and ESC depend on a regulated scheme and involves third parties (in the case of ESC, the National Agencies) it is unlikely that replacement will take place on a large scale if there are regulations in place to prevent this. Article 2 of the ESC proposal provides a definition of "solidarity activity". This means "an activity aimed at addressing unmet societal needs to the benefit of a community while also fostering the individual's personal, educational, social, civic and professional development,

which may take the form of placements, projects or networking activities, developed in relation to different areas [...].” In the definition of a solidarity activity there is no mentioning of whether the activity should be unpaid or not. One could ask what the solidarity aspect is when being paid to “address unmet societal needs to the benefit of a community”. Additionally, the ESC could be used by a wide range of organisations. This includes organisations that would have the means to organise solidarity activities themselves, for instance private companies organising Employee Volunteering Services.¹⁵

Following the logic of the ESC, the quality label should prevent any potential misuse and replacement of paid employment. This label ensures compliance with the principles and requirements of the European Solidarity Corps Charter (see annex). However, in the Charter and, subsequently, the quality label, there is currently no regulations included on avoiding replacement of paid employment.

5.3. Concerns related to complementarity to paid employment

The current proposal does not address the aforementioned questions concerning the relation between the ESC programme and paid employment. The absence of a comprehensive discussion of the relation between paid and unpaid employment results in the following concerns:

The solidarity aspect in the definition of ‘solidarity activity’ remains undefined

The ESC is not limited to volunteering activities and applies a wide definition of ‘solidarity activity’. “Solidarity acts” are defined as “an activity aimed at addressing unmet societal needs to the benefit of a community while also fostering the individual’s personal, educational, social, civic and professional development [...]” in a vast range of areas. These activities have no set form and can be divided into volunteering, traineeships and job placements in a solidarity-related area. Each of these types has different minimum requirements. For example, volunteering must be a full-time position, regardless of whether this action is carried out cross-border or in-country. “Jobs,” however, are defined through “a period of work from two to twelve months” that are in “accordance with the national regulatory framework of that participating country,” and thus do not need to be on a full-time basis (EC, 2017c, p.23-24). The EC fluid definitions in its proposal have been adopted to better meet market demand: Project proposals can now be evaluated after submission, rather than pre-emptively being dismissed. In this way the ESC can include a wider range of proposals. However, this use of broad definitions in the proposal also makes it difficult to assess to what extent the need that is measured to justify the ESC is relevant (EC, 2017a). This can lead to confusion how to demarcate the ESC; which organisations can apply for a quality label; and what activities “addressing unmet societal needs to the benefit of a community” would be suitable for volunteers, interns and employees to conduct within the framework of the ESC.

Quality label lacks regulations to prevent replacing paid employment

The content of the quality label is not yet provided. As the ESC is a programme that covers both a volunteering and a job strand, and because ‘solidarity activity’ can be interpreted in a broad way, further thoughts need to be given to what is indicated in the quality label on preventing replacing paid employment. In addition, the NAs need to be able to assess whether the participating organisations comply with the regulations, also several years after acquiring the quality label.

¹⁵ “An Employee Volunteer Program (EVP) is defined as a planned, managed effort that seeks to motivate and enable employees to effectively serve community needs through the leadership of the employer” (Points of Light, 2014, p.2).

6. CONCLUSIONS AND RECOMMENDATIONS

6.1. Introduction

The underlying assumption of the ESC is that through concentrating possibilities for volunteering, and collectively branding the voluntary activities under one name, the supply and demand can be better matched. This leads to a higher number of young people involved in solidarity activities and higher quality of services, ultimately also creating to better outcomes.

Positive elements of the ESC as identified in the assessment are:

- The ESC mitigates some of the identified barriers for individuals to engage in solidarity actions, especially concerning providing information, visibility and support for disadvantaged young people. Specific features of the ESC that reduce barriers for disadvantaged groups include: the possibility to participate in teams; to do in-country projects; and the extension of support services (provision of training, insurance and additional financial resources). Finally, by encompassing internships and jobs, and in-country solidarity actions the ESC also broadens the scope of the EVS.
- At an organisational level, the ESC imposes a quality label on organisations that are willing to participate. The introduction of this label can contribute to establishing a quality culture (if not already existing). In this manner, the ESC supports removing some of the challenges for attracting and working with volunteers and trainees at an organisational level. For instance, it could support organisations in providing clarity concerning rights and obligations, accountability and support structures.
- The ESC, compared to other forms of volunteering, can provide equal opportunities for all young people in the EU, regardless of the national opportunities. It also positions solidarity actions and volunteering at the heart of the European project and boosts the importance of solidarity across European borders.

Nevertheless, the assessment of the ESC proposal yielded concerns that require further action in the negotiations concerning the legislative proposal of the ESC. These concerns can be grouped into five categories: applying a partnership principle (see Section 6.2); objective and aims (Section 6.3); implementation and funding (Section 6.4); monitoring and misconduct (Section 6.5); policy options revisited (section 6.6).

Despite the reasoning of the EC to keep a fluid legislation to be more flexible in meeting market demand in the ESC execution, there is a need for better clarification of content to address some of the concerns identified. Other concerns are followed up by a concrete recommendation to the Members of the CULT Committee on the legislative proposal.

6.2. Partnership principle

The study identified the concern whether **stakeholders are sufficiently engaged in the ESC framework to ensure their commitment to quality, and to represent and protect their interests**. Contrary to the EVS programme, where participating organisations are mainly responsible for the matching of volunteers, and thereby quality and trust, the ESC's volunteer coordination is administered and overseen by the EC and NAs. Commitment to quality through continued trust is thus removed, and only incentivised through the obtaining of a quality label for organisations. Moreover, although different stakeholders have been actively engaged through consultation rounds before drafting the legislative proposal, it is unclear what their consulting and governing role will be during the execution of the ESC programme. This raises the question whether the interests of both organisations and volunteers are represented while setting up the ESC's framework. Participating and representative organisations are currently not included in the ESC framework, neither as advisory board nor as representatives to the Steering Committee. Similarly, social partners

are not mentioned in the proposal, despite the ESC objective to integrate a work strand into the programme. Likewise, there is no reference to how individual participants' and participating parties' interests and concerns will be represented and handled throughout the programme implementation.

Recommendation 1: provide more specific direction in the proposal how stakeholders are involved in the design, monitoring and implementation of ESC. To maximise the impact of the initiative and reaching its objectives, it is crucial that Commission, MS, and NA work closely with each other and in partnership with trade unions, employers, non-governmental organisations, youth organisations and other bodies responsible for promoting solidarity actions. By involving partners in the planning, implementation, monitoring and evaluation, the ESC will be better able to ensure that funds are spent where they are most needed, and in the best way possible. As a result, the Commission and Member States will have to ensure that all relevant views are considered when identifying priorities for funding and designing and implementing solidarity actions.

6.3. Objectives and aims

With regard to the category of objectives and aims, there are concerns whether the ESC can **deliver 100,000 solidarity activities in three years**. When looking more closely to long-term, full-time and cross-border volunteering (i.e. EVS), the ESC is highly ambitious. The EVS reached 100,000 participants in more than 20 years. It is evident from the demand for the EVS services that project demand outgrew the supply in project funding. It can safely be assumed that there will be an increase in projects that will be financed with more financial supplies available. Nevertheless, the current ESC proposal does not sufficiently explain how the ESC will be able to reach 100,000 solidarity activities in three years and how it will be able to find sufficient quality participants and participating organisations to satisfy this goal. The questions is also whether all organisations and places are satisfying the quality requirements, and whether the quality label would hamper the willingness of organisations to apply. Moreover, one would need more than 100,000 people being interested and more than 100,000 placements to make the matching, since it is not evident whether the participants find the placements of interest and whether the organisations find the participants they need.

Moreover, there is a concern whether the **differentiating opportunities lead to higher participation of disadvantaged groups**. The ex-ante evaluation has not accounted for other possible limiting reasons for disadvantaged youth not to participate in solidarity activities beyond geographical and financial boundaries, such as lost opportunity costs. Similarly, it has not been accounted for how many of disadvantaged youths currently participate in non-cross border and non-EU initiatives. Neither is the proposal clear on how different types of 'disadvantage' are classified and what obstacles and needs are connected to each specific disadvantage. The current framework of the ESC might fall short in overcoming the barriers that prevent those who would most benefit from the opportunity to participate in volunteering. While Article 12 specifically requests that the Commission and the participating countries ensure to promote social inclusion, there are no specific guidelines on how to ensure social inclusion. The Erasmus+ programme has established the SALTO-YOUTH network. Despite not being explicitly mentioned, it is likely that the ESC will incorporate a similar resource for participants' support and evaluation. It remains, nevertheless, questionable how the ESC will be more effective than preceding programmes in including participants from disadvantaged backgrounds and uphold an inclusive outreach. Similarly, it is unclear how the new matching system will enable different 'disadvantaged' applicants to participate. Will disadvantaged applicants receive additional support and training by default, or will they receive additional support after being matched? Given that the matching will ultimately still be done by participating organisations who offer placements, or will be based on group projects, it is

questionable whether the new matching tool will increase placements for applicants from disadvantaged groups, even if the ESC will receive more applications from this applicant group. Likewise, the proposal does not touch upon the form of support organisations will be offered in including participants from disadvantaged backgrounds. Outreach and funding are vital components to opening the ESC up for a wider pool of participants. As the ESC deliberately aims to be accessible for all, it should clearly reach out to disadvantaged groups.

A last concern in this cluster is whether the ESC creates **disparity between different volunteers doing the same job under different programmes**. Volunteers who are not ESC-funded, but who work within the same organisation or on similar projects or positions, may demonstrate equal, similar or excelling skills and expertise. Yet, they will not be granted a certificate by which they can officially record their skills or their certificate may be less valued. Equally, non-ESC volunteers will not (necessarily) have access to the same resources, while they are tasked with the same or similar responsibilities. This creates unfair competition between volunteers who carry out comparable tasks or demonstrate equivalent abilities. It could lead to a hierarchy in participation in voluntary programmes whereby young people prefer to engage with cross-border volunteering as offered through the ESC at the expense of nationally led schemes. This jeopardizes the contribution that in-country volunteering makes to a solidary Europe, which is often greater than that of cross-border volunteering.

Recommendation 2: The ESC proposal should clarify how – as a matching mechanism – it operates in complementarity to national initiatives and how national initiatives could benefit from the ESC, in particular in relation to the introduction of in-country solidarity actions. This also relates to rethinking how non-ESC volunteers can still benefit from the matching mechanism and the additional services associated with the ESC (training, assessment, etc.).

6.4. Implementation and funding

Several concerns were related to the quality label, funding and implementation of the ESC at national level. The first concern in this cluster relates to the creation of a European **quality label, and whether it introduces additional responsibility and accountability for the European Commission**. The ESC will offer a quality Label to participating organisations. There is, currently, no clear framework as to when an organisation qualifies for this label, or who carries the responsibility for the label. The concept note clarifies that there will be a periodic re-assessment and assessment in case of complaints by participants or third parties. Consequently, organisations may or may not lose their status of “qualified” organisation. However, without a clear definition of when organisations do and do not qualify, it is impossible to check whether organisations meet and maintain the conditions for the label. There is also a larger question of accountability in case of misuse of the label or (power-) abuse within the participating organisation. Although organisations carry responsibility, the EU may be held accountable for misuse and abuse of either the label or volunteers.

Another concern relates to the fact that the implementation of the ESC relies on the Erasmus+ infrastructure, and **whether the NAs have sufficient resources to conduct all tasks**. Although the NA management fee is categorized under the horizontal subdivision, in the absence of a clear description of what each of these categories entails, these services are likely to also partly cut into the Management fee budget. For example, it is not specified in the Annex which amount is specified for the Management of the quality label and under which subdivision this is categorised. It is unclear which aspects of service costs fall under which budgets and what services the Management Fee itself in- and excludes. The workload of the implementing bodies (EACEA and NAs) might be challenging on several aspects of the ESC, like the implementation of the European quality label (including the assessment of information

provided by organisations and an on-site visit) and the many short-term volunteering and placements and small-scale projects. Currently, no information is available on the quality label and the procedure for obtaining it.

A further concern relates to **the distribution of funding at MS level**, since the ESC proposal does not provide an indication of how the budget and activities within the ESC are distributed across the MS (unlike the Erasmus+ regulation). Although the distribution of budget across MS seems to be based on a similar methodology as Erasmus+, the absence of concrete information on this for the ESC makes it challenging to see on what basis solidarity activities are distributed across the MS and to what extent the distribution considers different country-specific needs. One key element of the ESC is the matching function between supply and demand of solidarity activities. This matching procedure is not yet further developed and hence does not specify on which criteria decisions are based or how the programme allocates imbalanced application numbers from countries.

Recommendation 3: The proposal should elaborate on the objective, scope and governance of the quality label. Given the wide definition applied to solidarity actions and participating organisations (Article 2.4¹⁶), the demarcation of the application and the procedures for assuring quality should be rethought; also in the light of the workload associated with quality assuring 'any public or private entity' which applies.

Recommendation 4: The proposal should include a clear mechanism on how budgets are distributed to MS and what tasks the National Agencies need to conduct in terms of quality assurance, implementation, outreach and support.

6.5. Monitoring and Misconduct

The last group of concerns are related to the monitoring framework, definition of 'solidarity activity' and how to prevent replacing paid employment.

The first concern relates to the fact that **the monitoring framework is not yet developed**, raising questions on how the ESC's contribution to its general objective (strengthening cohesion and solidarity in Europe) will be assessed. According to the explanatory memorandum, the monitoring and evaluation arrangements of the European Solidarity Corps will consist of permanent monitoring to assess progress and an evaluation to assess the existing evidence on the effectiveness of the results achieved. Currently, however, the proposal does not outline any indicator for qualitative measurements or quantitative measurements, except for the number of placements it wants to offer. Instead, an elaborate set of monitoring indicators (including result and impact indicators) is to be developed within six months after entry into force of the Regulation. Yet, indicators need to be in place when the Regulation enters into force to make data collection effective and ensure permanent monitoring. Moreover, quality audits must be carried out with clear indicators that are measured uniformly across all projects.

Another concern relates to whether the **definition of 'solidarity activity' sufficiently clarify the requirements of the solidarity aspect in ESC supported activity**. The EC's fluid definitions in its proposal have been adopted to better meet market demand. Project proposals can now be evaluated after submission, rather than pre-emptively being dismissed. In this way, the ESC can include a wider range of proposals. However, this use of broad definitions in the proposal also makes it difficult to assess to what extent the need that is

¹⁶ EC, 2017c, p.23: 'any public or private entity that has been attributed the European Solidarity Corps quality label, which offers a placement to a participant in the European Solidarity Corps or implements other activities in the framework of the European Solidarity Corps'

measured to justify the ESC is relevant. This can lead to confusion how to demarcate the ESC; which organisations can apply for a quality label; and what activities “addressing unmet societal needs to the benefit of a community” would be suitable for volunteers, interns and employees to conduct within the framework of the ESC.

The last concern relates to whether **the quality label includes regulations to prevent replacing paid employment**. The content of the quality label is not yet provided. As the ESC is a programme that covers both a volunteering and a job strand, and because ‘solidarity activity’ can be interpreted in a broad way, further thoughts need to be given to what is indicated in the quality label on preventing replacing paid employment. In addition, the NAs need to be able to assess whether the participating organisations comply with the regulations, also several years after acquiring the quality label.

Recommendation 5: To assess whether the ESC proposal contributes to its stated objectives, the proposal should better explain how the ESC contributes to the foreseen results. This includes as well that the indicator-set needs to be in place to monitor progress towards results and the extent to which the ESC contributes to the stated objectives of other programmes funding ESC. This means that the development of a monitoring system cannot wait till six months after the Regulation enters into force. The monitoring system also needs to monitor closely the implementation. This is especially for assessing whether the new activities also benefit young people from more disadvantaged backgrounds. The contribution of the ESC to the stated objectives of the supporting programmes should also be monitored.

Recommendation 6: The legislative proposal should make clearer what is understood by solidarity actions, unmet societal needs and participating organisations (Article 2.1¹⁷). This definition leaves room for a wide range of organisations to engage in solidarity actions while conducting commercial activities. In addition, the proposal should make explicit how it prevents misuse and replacing paid employment.

6.6. Policy options revisited

One option that is discarded very early in the ex-ante evaluation is to integrate the ESC under the Erasmus+ programme. It was assessed that integrating it within Erasmus+ would make the Erasmus+ regulation too complex and would not support the visibility of the ESC. These two motivations can be critically assessed and **the choice for a separate initiative, above integrating the ESC in Erasmus+, could be better explained**. The argument concerning the **complicated nature** does not appear to be very strong. The Erasmus+ programme is responsible for 58 per cent of the total ESC budget. Additionally, the ESC uses the same implementation structure as the EVS, relying on NAs. The fact that the ESC is not solely about mobility should not be problematic for integrating it in the Erasmus+ programme, as of the total of 100,000 participants only 15,200 will participate in the in-country solidarity projects. This in-country part of the ESC can hardly be considered the core-element of the programme. Secondly, the visibility argument can also be countered. In the negotiations for the Erasmus+ programme, the visibility and branding argument was one of the arguments to merge the preceding programmes under one umbrella. The other programmes (and sub-programmes) would benefit from the strong brand name of Erasmus. The same could apply to the ESC; it could benefit from the branding of Erasmus+ (especially when it concerns cross-border solidarity activities). A separate initiative as implementation modality resonates stakeholder’s desires to better integrate different solidarity-related actions and programmes in one programme. Nevertheless, it is unclear why this integration could not have taken place under

¹⁷ EC, 2017c, p.23: ‘an activity aimed at addressing unmet societal needs to the benefit of a community while also fostering the individual’s personal, educational, social, civic and professional development, which may take the form of placements, projects or networking activities, developed in relation to different areas’

Erasmus+. The conclusion of the ex-ante evaluation then needs further motivation and argumentation, especially in relation to the option to integrate the ESC under Erasmus+, which has not been considered in full.

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ANNEX 1: METHODOLOGICAL APPROACH

The study consists of three research steps:

- **Desk research** on relevant publications related to the ESC, other EU programmes, position papers of European (and when encountered) national associations of solidarity organisations, youth organisations and other stakeholders (e.g. employers' organisations);
- **Interviews** with European level associations, stakeholders and experts. The following interviewees are conducted:
 - Floor van Houdt: Head of Unit for Youth, Volunteer Solidarity and Traineeships Office, European Commission - Directorate General for Education, Youth, Sport and Culture
 - Manuel Gonçalves Gil: European Youth Forum AISBL / Policy Officer Education and Youth Work
 - Ignacio Doreste: ETUC Youth Officer, European Trade Union Confederation
 - Mattia Lolli: President of Alliance of European Voluntary Service Organisations
 - David Lopez: President of the Lifelong Learning Platform
 - Artur Payer: Programme Manager, the Directorate General for Education and Culture
 - Robert France: Head of Sector for Erasmus+: Youth in Action programme
- **Analysis and reporting:** The outcomes of the desk research and interviews are analysed.

ANNEX 2: QUALITY LABEL

European Solidarity Corps Charter¹⁸

Participating organisations shall:

- identify clearly which activities are relevant to the European Solidarity Corps initiative and make sure that they are carried out in compliance with this charter;
- (pre-) select and recruit European Solidarity Corps participants in compliance with the principles of equal treatment, equal opportunities and non-discrimination;
- seek to empower European Solidarity Corps participants by valuing their skills and experience while engaging them in their activities, fostering their personal, socio-educational and professional development;
- ensure that the environment and conditions in which the activities are performed are safe and decent;
- provide adequate training or support to help European Solidarity Corps participants fulfil their tasks;
- not request or require any financial contribution or fee from European Solidarity Corps participants;
- providing European Solidarity Corps participants, when applicable, with the agreed allowances in a timely manner;
- process personal data of the European Solidarity Corps participants in full compliance with European and national legislation on data protection;
- ensure that the support to the organisation's activities by the European Solidarity Corps participants is adequately made visible and recognised.

Before the deployment in the field:

- ensure that the European Solidarity Corps participants receive detailed information about the initiative and the task they are asked to carry out;
- ensure that participants have the necessary rights or permissions to be in the country where the placement takes place, for the entire duration of the activity.
- ensure that the European Solidarity Corps participants are covered by the appropriate insurance and that they are made aware of the arrangements that are in place to ensure their safety and well-being;
- in case of occupational activities, ensure that the specific conditions and benefits of the European Solidarity Corps initiative are respected under the employment contract.

During the deployment in the field:

- offer support, supervision and guidance (for volunteering activities) or access to support and assistance (for occupational activities) to the European Solidarity Corps participants by experienced staff;
- take into account the different linguistic and cultural background of the European Solidarity Corps participants and put in place measures that facilitate their integration into the local community of deployment;
- facilitate contacts with other European Solidarity Corps participants active in the same area.

After the deployment in the field:

- issue a certificate to each European Solidarity Corps participant.

Modalities for selection and recruitment of Corps participants:

- once the organisation is able to make a concrete offer for a placement, it should access the European Solidarity Corps portal to search the database and select the most suitable candidate(s) for the activity in question;
- the organisation may decide to interview the candidate to know more about her/his profile and motivation.

¹⁸ https://europa.eu/youth/solidarity/charter_en

NOTES

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