

on the Commission proposal on the EU Youth Strategy 2019-2027

The current framework for youth policy cooperation in Europe—the EU Youth Strategy—expires at the end of 2018. This framework sets out how EU Member States cooperate in the youth field. The European Commission presented its proposal for a new EU Youth Strategy on 22 May 2018.¹ This proposal forms the basis for negotiations among EU Member States in the coming months. It is intended that the EU Council of Youth Ministers will adopt the new EU Youth Strategy at the end of November 2018.

With this statement, the German Federal Youth Council (DBJR) evaluates the proposal of the European Commission from the perspective of youth association work and would like to contribute specific suggestions for improvement to the discourse on the new EU youth strategy.

The aim of an EU youth strategy must be to strengthen youth policy at EU level cross-sectorally and structurally. As a strategic framework for youth policy cooperation in Europe, the EU Youth Strategy together with the funding programmes must improve the living conditions of young people in Europe. Young people should not only be regarded as a risk group and human capital; their strengths and interests must be recognised and supported. Young people are experts in their own lives and want to help shape Europe today and in the future.²

A Renewed Framework for European Cooperation in the Youth Field

The DBJR welcomes the Commission proposal for the new EU Youth Strategy. We approve of the strategy's approach of focusing on a few youth-specific areas of action and of setting up youth policy across departments. The three proposed action areas, "Engage – Connect – Empower", reflect essential elements of youth policy and youth work and thus form a good basis for the EU Youth Strategy. We also support a focus on reaching out to all young people, cooperation at all levels and taking digitalisation into account. In addition, the necessary freedom for and quality of youth work seem to have an important significance.

The European Commission proposes that Member States define specific and flexible areas of action. The DBJR welcomes this two-stage approach. While the defined areas of action address important core issues of youth work, the list of flexible fields of action must be transformed into clearly structured priorities. In this context, we are particularly positive about the idea of National Action Plans, which allow Member States to define their objectives and measures for implementing the EU Youth Strategy. This should help to improve the effectiveness of the strategy and make it more binding on the Member States.

The EU Youth Strategy is to be adapted to the duration of the Multiannual Financial Framework (2021-2027) and will therefore apply from 2019 to 2027. The DBJR welcomes this adjustment because it allows better coordination between the policy strategy and EU funding programmes. However, since the new EU Youth Strategy is to start as early as 2019, the transition must be regulated for the years 2019 and 2020. This is the only way to ensure the resulting synergies serve the implementation of the EU Youth Strategy from the outset.

¹ Press release in German: http://europa.eu/rapid/press-release_IP-18-3704_de.htm as well as the EU Youth Strategy and more information in English: https://ec.europa.eu/youth/news/eu-youth-strategy-adopted_de

² For our "Guidelines on the EU Youth Strategy and Erasmus" see our website: <https://www.dbjr.de/artikel/eckpunkte-zur-eu-jugendstrategie-und-erasmus/> (German)

Despite all the positive approaches, it cannot be overlooked that many points in the proposal are still very vague. In many instances, it remains unclear how one or the other point is to be implemented in practice, which makes a comprehensive evaluation difficult. Some of these points will be discussed below, and our demands will be substantiated. It is up to the EU Member States how effectively and forcefully the EU Youth Strategy is negotiated, interpreted and implemented.

Unfortunately, the activities and the role of youth organisations are not adequately appreciated in the present proposal. In recent years, they have been actively involved in the implementation of the current EU Youth Strategy and are important intermediaries, especially when it comes to cooperation with the regional and local levels.

It is also disappointing that the European Youth Goals, which were developed at the EU Youth Conference in Sofia in April 2018, are nowhere recognisably included in the proposal, although this EU-wide youth participation process was launched in the summer of 2017 with the explicit aim of involving young people in the development of the new EU Youth Strategy. The fact that the European Commission does not take up the results visibly contradicts what the Commission itself writes in the proposal on the importance of participation and is a bitter disappointment for the tens of thousands of young people who have participated in the process. We call on the EU Member States to take up the European Youth Goals in their negotiations and to ensure that the contributions of young people are visibly reflected in the new EU youth strategy.

Cross-sectoral Youth Policy and Its Implementation

For better coordination, the European Commission proposes the introduction of an EU Youth Coordinator. As a way to acknowledge (European) youth policy as a cross-sectoral issue, this is a correct sign and represents actual progress for a cross-sectoral youth policy. However, it seems unwise to integrate the task of institutional coordination and a contact point for young people in one position. The DBJR therefore places the following requirements on an EU Youth Coordinator:

- The body must not remain at the symbolic and representative level, nor must it release all other stakeholders from responsibility.
- The coordination of youth policy cooperation in Europe cannot be left to one person alone. The EU Youth Coordinator needs to be supported by a secretariat or staff.
- The post must not be part of the Directorate-General for Education, Youth, Sport and Culture, but must be as high-level as possible and have the appropriate powers to coordinate youth policy in Europe.
- The EU Youth Coordinator must not simultaneously serve as a “contact point for young people”. Because young people, just like all other people, have many concerns that cannot be covered by one person alone.

The example of the Interdepartmental State Secretaries' Committee for Sustainable Development in Germany shows how the position of the EU Youth Coordinator could be developed or supplemented. In Germany, the main responsibility for sustainability policy rests with the Federal Chancellery³. In addition, a specific person is responsible for sustainability policy in each federal ministry. A committee of state secretaries from the federal ministries regularly sits to ensure cross-sectoral coordination. Various civil society stakeholders are involved through a dialogue group within the framework of the conference of state secretaries.

With the Committee of State Secretaries, interdepartmental policy is located at the highest possible level. Furthermore, the thematic allocation in the Chancellery enables better cross-sectoral coordination and strengthens

³ For more information see: www.bundesregierung.de/Webs/Breg/DE/Themen/Nachhaltigkeitsstrategie/4-der-Staatssekretarsausschuss/aufgaben/_node.html (German, for English see: <https://www.bundesregierung.de/Content/EN/StatischeSeiten/Schwerpunkte/Nachhaltigkeit/nachhaltigkeit-2013-10-15-monitoring.html?nn=393722>)

its importance. At European level, the post could be placed in the cabinet of the President of the Commission. Together with the individuals in charge of the according policy content in the Directorates-General, they could assist the Directors-General in their regular meetings on youth policy.

Youth Policy Priorities in Europe

The Work of youth organisations

The areas of action set out in the Commission proposal address key issues of the work of youth organisations, such as participation, youth work and solidarity. Even though there is little evidence of the instrumentalisation of youth work compared with other documents, the tendency to exploit it for the labour market is still problematic. Moreover, solidarity is not only lived in the European Solidarity Corps, but it is daily practice in youth organisations and youth groups. We therefore find the strong focus on the European Solidarity Corps in this proposal problematic.

The DBJR welcomes the inclusive approach: the new EU Youth Strategy must reach out to all young people, including young refugees and young people from migrant backgrounds, young people with and without disabilities, young people from different socio-economic and educational backgrounds, and young people living in rural areas or towns. This corresponds with young people's concept of humanity and their basic values of self-organization in youth organisations. They focus on the uniqueness of the individual, regardless of the above criteria. In youth organisations, no young person is disadvantaged, e.g. because of social and individual circumstances.

Unfortunately, it is precisely this role of youth organisations as inclusive and local mediators that is not sufficiently recognised in the Commission proposal. Young people get involved and self-organized in youth organisations voluntarily and can thus tangibly influence the development of society. Youth organisations are workshops of democracy and are based on diversity, plurality and self-organisation. Structures that have been built locally and democratically organised youth organisations to the example of child and youth welfare in Germany must therefore be supported structurally and financially.

The Eighth Book of the Social Code (SGB VIII) deals with the legal regulations concerning child and youth welfare in Germany. Paragraph 12 contains the unconditional obligation to promote the work of youth organisations:

(1) The independent activities of youth organisations and youth groups shall be promoted in accordance with § 74 while preserving their statutory autonomy.

(2) In youth organisations and youth groups, youth work is organised by young people themselves, and developed jointly and co-responsibly. Their work is long-term and usually geared to their own members, but it may also address young people who are not members. Youth organisations and their associations express and represent the concerns and interests of young people.

The topic of youth work is well anchored in the current proposal as an independent area with a focus on quality, innovation and recognition of volunteering. However, we take a critical view of focussing on the recognition of educational achievement or acquired competences, as this recognition reduces volunteering to educational outcomes. The work of youth organisations is more than education: It needs freedom and thus cannot be validated. A good example of quality assurance without validation of educational outcomes is the Jugendleiter_in-Card in Germany:

The Jugendleiter_in-Card - Juleica⁴ is a nationwide uniform, officially confirmed identity card for regular qualified volunteering in youth work. The Juleica stands above all for quality and qualification in youth work, social recognition for voluntary commitment and legitimacy vis-à-vis participants. Under the joint responsibility of public and private bodies—i.e. governmental and non-governmental bodies together—Juleica combines the necessary commitment with the equally necessary flexibility and federal diversity. National binding minimum standards are combined with referring regulations in the 16 federal states and an association-specific implementation of the standards in training.

We consider the thematic link between youth work and the Council of Europe to be important and correct, as we regard co-management, its joint decision-making structures between government and civil society, as exemplary. The opportunities of co-management in developing and evaluating youth policy cooperation at EU level and in allocating subsidies should be tested promptly at European level.

Other Priorities for European Cooperation in the Youth Field

The DBJR welcomes the flexibility of the strategy so that the Member States can identify flexible fields of action and adapt their youth policy to current developments in addition to the areas of action defined.

In the current proposal, the flexible topics are formulated as an open list. We find many of these topics important from the point of view of youth organisations; in addition, we propose the following topics for a deeper approach:

- Enabling and securing access to formal and non-formal education as a basic prerequisite for guaranteeing equal opportunities in society and promoting the commitment of young people as active citizens.
- Actively tackling discrimination at all levels and promoting diversity: Diversity enriches and shapes social relations and must therefore be considered as an opportunity.
- Making the fight against youth unemployment and precarious employment a European task: It must be a common objective of the Member States to create skilled jobs for all young people and to safeguard social rights for young people in Europe.
- Designing digitalisation and internet policy to suit young people: digitalisation is changing our society and particularly affects young people who are naturally moving in digital environments.
- Intensifying political education and democracy education, especially against the background of current developments in democracy policy and populism in Europe.

The Instruments of European Cooperation in the Youth Field

Participation Processes and the Role of Youth Organisations

If the European project is to be strengthened and a democratic society based on solidarity is to be promoted, young people must be involved at all stages of policy-making, access to which must be made easier. Not only to “enable them to turn their dreams into reality,”⁵ but also to actively shape society. This does not only strengthen their sense of belonging, but ultimately leads to a better policy that meets the needs of all stakeholders involved in the process.

⁴ For more information see: <http://www.juleica.de/> (German)

⁵ COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE EUROPEAN COUNCIL, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS Engaging, Connecting and Empowering young people: a new EU Youth Strategy COM(2018) 269 final, https://ec.europa.eu/youth/sites/youth/files/youth_com_269_1_en_act_part1_v9.pdf, page 5

In the past, the Structured Dialogue has often led to frustration among young people and youth organisations, because the process was often organised as a pure consultation of opinions without any impact on current youth policy. The DBJR therefore welcomes the intention of the European Commission to further develop the youth participation process within the framework of the EU Youth Strategy through the new EU Youth Dialogue. We approve of combining this new start with a change in the rather unattractive term “Structured Dialogue”.

The EU Youth Dialogue aims to enable young people from different backgrounds to comment on political decisions at EU level. In addition, participation is to be better anchored locally, monitoring mechanisms are to be improved and more focus is to be placed on transparency, visibility and use of the results. We welcome these general objectives.

However, in our opinion what sounds largely good in the “Participation” section of the Communication is not really reflected in the detailed work plan described in the Staff Working Paper⁶. We therefore call on the governments of the Member States to improve the following points:

- *Developing dialogue between young people and policy-makers.* In the process planned so far, broader discussions are only planned in the first phase and during the EU Youth Conferences. Above all, broad participation in the new EU Youth Dialogue must not be reduced to quantitative surveys.
- *Creating clear objects and specific occasions for participation.* Youth participation should go beyond the strategic agenda of the Council work plans for youth. The EU Youth Strategy should stipulate that young people should also be involved in the development and implementation of EU programmes, initiatives or other schemes that affect them (e.g. EU funding programmes or European initiatives such as the European Solidarity Corps or #DiscoverEU).
- *Ensuring openness to young people’s issues.* In the EU Youth Dialogue, too, the main topics will once again be defined centrally and will feed on the strategic agenda of the Council’s work plans for youth. Young people should be able to contribute their own issues to the dialogue process at EU level and thus actively shape the youth agenda.
- *Ensuring that young people are truly involved at all stages of the participation process.* There must be no doubt that the representatives sent by the National Working Groups to the EU Youth Conferences must be youth representatives.
- *Strengthening links at local and regional level.* Even if the focus of the first dialogue phase is on local discussions, their consistent integration in the two following phases is missing. In addition, the new Erasmus programme should be more closely linked to the EU Youth Dialogue. Since the Structured Dialogue projects of the current Key Action 3 offer a good opportunity to ground the European and national processes and address a variety of target groups through different formats and methods, this could be a way to promote the desired local and regional integration of the EU Youth Dialogue. The new Erasmus programme does not yet provide for specific support for EU youth dialogue projects. Instead of very vaguely formulated youth participation activities, priorities should be set on EU Youth Dialogue projects and purely national funding should be possible. The German National Agency’s funding strategy for Key Action 3⁷, the previous version of which was developed jointly with the DBJR, is an example of good practice to illustrate how content can be linked.

⁶ COMMISSION STAFF WORKING DOCUMENT, Results of the open method of coordination in the youth field 2010 (2018 SWD(2018) 168 final), https://ec.europa.eu/youth/sites/youth/files/youth_swd_168_1_en_autre_document_travail_service_part1_v6.pdf, page 65f.

⁷ https://www.jugend-in-aktion.de/downloads/doctrine/JugendFuerEuropaJugendInAktionBundle:Dokument-file-133/F%C3%B6rderstrategie_LA3_SD_2017.pdf (German)

- *Strengthening the effectiveness of participation.* Although, according to the Commission proposal, the third dialogue phase is dedicated to follow-up, feedback and follow-up at EU level seem to be left to the EU Youth Coordinator. In our opinion, this is not enough. We expect a stronger commitment from all relevant European stakeholders.

Regrettably, the EU Commission does not recognise the role and the work of youth organisations and National Youth Councils have achieved within the Structured Dialogue in recent years. It assumes that mainly youth organisations active in EU affairs have participated. This does not apply to Germany at least.

A wider scope of the process and reaching more young people is desirable. But the motivation of adolescents and young people to participate stands and falls with the effectiveness of the participation process: If they feel their contributions are being taken serious and that they are comprehensibly integrated into political processes, the motivation of the participants also increases.

The DBJR welcomes that the new EU Youth Dialogue should focus more on disadvantaged young people, even though we would like to see a focus on reaching out to ALL young people. We are critical of the idea of relying heavily on online participation (e.g. online campaigns) and of expanding the European Youth Portal in particular. The European Youth Portal is unsuitable as a single online entry point, especially if the participation processes are to be made more inclusive. For one thing, it is not designed for easy accessibility. On the other hand, online participation alone rarely addresses so-called “disadvantaged” target groups. Experience shows that disadvantaged young people in particular become aware of opportunities for participation via peer groups or individual reference persons (e.g. group leaders, social workers). Independent institutions of youth work such as youth organisations are therefore particularly well suited as intermediary between the stakeholders and levels. It is thus essential to strengthen their role in the new EU Youth Dialogue. The same applies to the National Youth Councils as intermediaries between the national and European levels.

National Action Plans

For the national implementation of the EU Youth Strategy, the European Commission proposes that Member States adopt National Action Plans with self-chosen targets and indicators every three years. If, for example, this results in a greater commitment of the Member States and greater effectiveness through national control mechanisms, we believe that this approach should be supported. However, we expect civil society to be structurally involved in the preparation of the National Action Plans. In addition, the National Action Plans must be closely coordinated with the National Youth Strategy and be strongly anchored at local and regional level.

Learning from One Another

Another important instrument for implementing the EU Youth Strategy is mutual learning between Member States. In the current Youth Strategy, this instrument was particularly important in the context of multilateral cooperation projects. The DBJR welcomes that this instrument should also be part of the new strategy.

However, in order to offer added value for youth policy in one’s own country, it is important that cooperation is targeted and thematically focused. Member States need flexibility to work on the issues relevant to them. This creates a higher motivation for active cooperation. In order to make cooperation as practical as possible, the participation of civil society, in particular youth organisations, must be guaranteed. Formats and methods of cooperation should be designed to suit the needs of young people and target groups, so that young people in particular can participate in the activities according to their possibilities. Moreover, key content and results must be published, so that as many stakeholders as possible—even beyond the circle of Member States—benefit from

the process of mutual learning. The transfer capacity and feedback to the practice on site must be taken into account.

Monitoring

To accompany the implementation of the EU Youth Strategy, a European platform involving civil society is to be created. We welcome the fact that civil society should also be continuously involved at European level in the implementation of the EU Youth Strategy. However, much depends on the actual design of the platform. We expect civil society to be structurally, effectively and substantially involved in all areas of the implementation of the EU Youth Strategy. One meeting per year is insufficient for this purpose.

For a better overview, youth policy expenditure in Europe is also to be monitored centrally. From the point of view of youth organisations, this is an important first step in understanding the implementation of youth policy as a cross-sectional task.

Member States' Responsibility for a Good Youth Policy

The Commission has presented its proposal for the EU Youth Strategy. It is now up to the Member States to negotiate a good youth strategy, implement it effectively and improve the lives of young people.

Adopted by the Executive Committee on 28 June 2018.