

EUROPEAN
COURT OF AUDITORS

ISSN 1831-0834

Special Report No 4

2010

IS THE DESIGN AND MANAGEMENT OF THE
MOBILITY SCHEME OF THE **LEONARDO DA VINCI**
PROGRAMME LIKELY TO LEAD TO EFFECTIVE
RESULTS?



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Special Report No 4 // 2010

IS THE DESIGN AND MANAGEMENT OF THE MOBILITY SCHEME OF THE LEONARDO DA VINCI PROGRAMME LIKELY TO LEAD TO EFFECTIVE RESULTS?

(pursuant to Article 287(4), second subparagraph, TFEU)

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Special Report No 4 // 2010

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Cataloguing data can be found at the end of this publication
Luxembourg: Publications Office of the European Union, 2010

ISBN 978-92-9207-796-9
doi:10.2865/76038

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Printed in Luxembourg

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REPLY OF THE COMMISSION

EXECUTIVE SUMMARY

I.

The Leonardo da Vinci programme is designed to implement the European Union's vocational education and training policy. Mobility projects, the largest part of the programme, enable organisations involved in vocational education and training to send participants to another European country, thus giving them the chance to improve their competences, knowledge and skills.

II.

The European Commission has overall responsibility for the programme and monitors and supervises its implementation in cooperation with national authorities — usually education ministries — in each participating country. Operational responsibility for managing mobility projects is fully devolved to the national agencies designated by the Member States.

III.

The Court considered whether the design and management of the Lifelong Learning Programme's (2007–13) Leonardo da Vinci mobility scheme is likely to lead to effective results.

EXECUTIVE SUMMARY

IV.

The Court's findings relate to an audit carried out at the Commission and in six participating countries selected for the audit. Since Leonardo is one of four education and training programmes included in the Commission's Lifelong Learning Programme, many audit findings have relevance that extend to the other Lifelong Learning Programme schemes. The Court found that:

- In designing the current Leonardo da Vinci programme (2007–13), the Commission took account of its own mandatory evaluations of the predecessor programme, but did not systematically take account of other important studies and reports.
- The Commission established an appropriate project life cycle management system for Leonardo, but the supporting IT system had some significant omissions.
- The operational elements of the programme, including publicity and promotion of the programme and the annual programming cycle, were generally well managed, but the Commission did not address the difficulties of applicants in finding partners and did not ensure the quality of national agencies' assessments of grant applications.
- A system of reporting is in place but it does not yet enable the Commission to measure the results and effects of the programme. There are shortcomings in the system for reporting on the results and effects of the Leonardo programme. The Commission had started but not yet completed the establishment of a comprehensive system for the measurement of the impact of Leonardo by the third year of the programme.
- Controls at national agency level complied with Commission guidance.
- There are weaknesses in the way national authorities carry out their secondary controls of national agencies.
- The overall conclusion is that the design and management of the mobility scheme of the Leonardo da Vinci programme could lead to effective results. The Commission had started but not yet completed the establishment of a comprehensive system for the measurement of the impact of Leonardo. As a result, the Commission cannot yet assess how the objectives are being met three years into the programme — around half of its lifespan.

V.

On the basis of these observations, the Court makes recommendations to the Commission to improve the supporting IT system, provide qualitative feedback regarding the annual programming of work, provide more support for finding host partners, further develop and monitor procedures for assessing project applications, finalise SMART objectives and performance indicators without further delay, improve the assessment of results, focusing more on the impact of the programme, and, in the future, ensure that for any successor programme a system for measuring impact is set up from the outset.

INTRODUCTION

1. The Lisbon European Council in March 2000 set the strategic objective for the European Union to become the world's most dynamic knowledge-based economy by 2010. It recognised the important role of education as an integral part of economic and social policies. The basis for European cooperation in vocational education and training was laid down in the subsequent 'Copenhagen process'¹ which established the objective of increasing voluntary cooperation, in order to promote mutual trust, transparency and recognition of competences and qualifications, thereby establishing a basis for increasing mobility and facilitating access to lifelong learning.

2. The European Commission has brought its various educational and training initiatives together under a single umbrella, the Lifelong Learning Programme², with the aim of fostering interchange, cooperation and mobility between education and training systems within the Union. The new Lifelong Learning Programme replaces previous education, vocational training and eLearning programmes, which ended in 2006.

3. An indicative financial allocation³ for the implementation for the seven-year period starting on 1 January 2007 was 6 970 million euro. Within this allocation, the sums to be allocated to the subprogrammes shall not be less than:
 - Comenius 13 %;
 - Erasmus 40 %;
 - Leonardo da Vinci 25 %;
 - Grundtvig 4 %.

4. Leonardo da Vinci is the name given to the subprogramme designed to implement the European Union's vocational education and training policy, supporting and supplementing actions taken by the Member States. The current phase of the Leonardo da Vinci programme 2007–13 is a continuation of former programmes, Leonardo I (1995–99) and Leonardo II (2000–06). The general, specific and operational objectives of the Lifelong Learning Programme and of Leonardo da Vinci are set out in paragraph 44 and in the **Annex**.

¹ The Copenhagen process was launched in November 2002 by the ministers for education and vocational training of the European Union and the countries belonging to the European Economic Area (EEA) and the European Free Trade Area (EFTA), the European social partners and the European Commission.

² Decision No 1720/2006/EC of the European Parliament and of the Council of 15 November 2006 establishing an action programme in the field of lifelong learning (OJ L 327, 24.11.2006, p. 45).

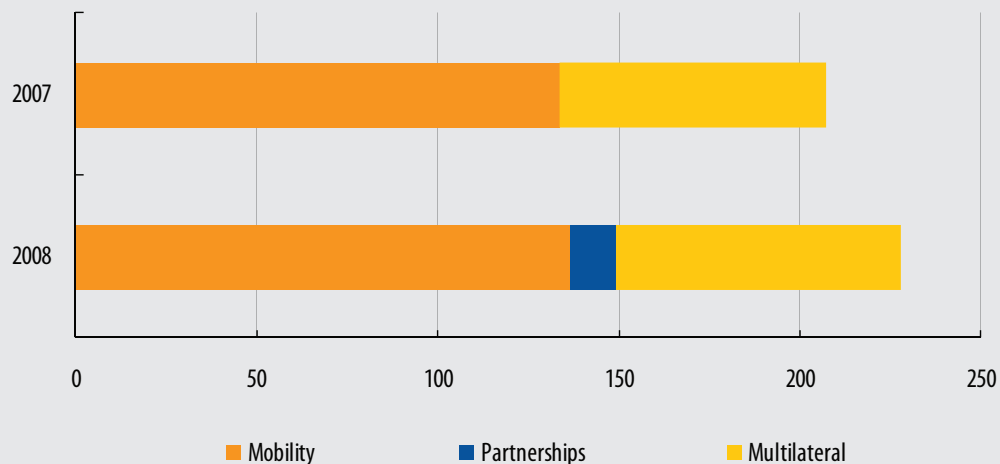
³ Article 14 and paragraph B.11 of the Annex to Decision No 1720/2006/EC.

⁴ In this report, the term 'Leonardo' refers to the current phase of the programme.

5. A range of activities may be supported by the Leonardo da Vinci programme, including:
- mobility — where participants spend some time in another European country;
 - partnerships focusing on themes of mutual interest;
 - multilateral projects, in particular those aimed at improving training systems.
6. Mobility projects continue to be one of the main forms of activity in Leonardo, as they were for its predecessors. As shown in **Graph 1**, the share of Leonardo grants awarded to mobility projects was 64 % in 2007 and 59 % in 2008.

GRAPH 1

LEONARDO DA VINCI, GRANTS AWARDED TO PROJECTS BY TYPE OF ACTIVITY 2007-08 (MILLION EURO)

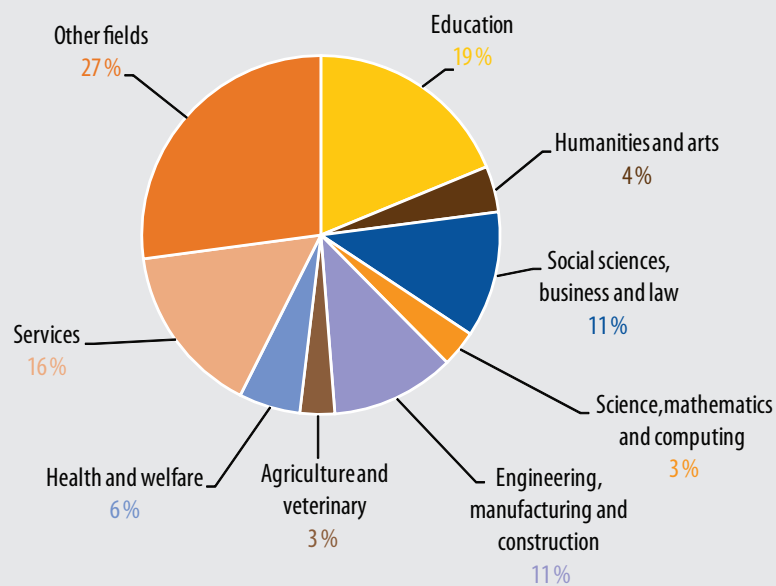


Source: European Commission.

7. Mobility projects supported by Leonardo are intended to give individuals, including trainees in initial vocational training and people already in the labour market, as well as vocational education and training professionals, the chance to improve their competences, knowledge and skills through a training placement in another European country. Grants contribute to project management, travel costs and living expenses. The distribution of participants in 2008 mobility projects by field of education and training is shown in **Graph 2**.

GRAPH 2

PARTICIPANTS IN 2008 MOBILITY PROJECTS BY FIELD OF EDUCATION AND TRAINING



Source: European Commission.

ROLE OF THE COMMISSION

8. The European Commission has overall responsibility for ensuring effective and efficient implementation of the Lifelong Learning Programme⁵. The Lifelong Learning Programme Committee, comprising representatives of Member States, assists the Commission with the implementation of the programme. The Commission's role is to:
- regularly monitor and evaluate the Lifelong Learning Programme against its objectives⁶ in cooperation with the Member States; and
 - establish appropriate supervisory controls, by overseeing and coordinating the operation of the whole system and reviewing the systems of national controls⁷.

⁵ Article 6 of Decision No 1720/2006/EC.

⁶ Article 15 of Decision No 1720/2006/EC.

⁷ Article 8 of Commission decision of 26 April 2007 relating to the respective responsibilities of the Member States, the Commission and the national agencies in implementation of the Lifelong Learning Programme (2007–13).

ROLE OF THE NATIONAL AUTHORITY

9. There are 31 participating countries in the programme: the 27 EU Member States plus Iceland, Liechtenstein, Norway and Turkey. The national authority, usually the education ministry in each participating country, monitors and supervises the work of its national agency in cooperation with the Commission. The national authority is responsible for establishing a system of secondary controls, whose objective is to give reasonable assurance that the systems and primary controls carried out by the national agencies are working effectively.

ROLE OF THE NATIONAL AGENCY

10. Operational responsibility for mobility projects within Leonardo is fully devolved to national agencies established within each participating country. These national agencies are responsible for the management of the life cycle of the mobility projects. They also contribute, as required, to the Commission's monitoring and evaluation of the programme. The functions expected of them are set out in the legal basis of the programme, including the Commission decision on the respective responsibilities of the European Commission, the Member States and the national agencies implementing the Lifelong Learning Programme (C(2007) 1807); the operational instructions are detailed in the 'Guide for national agencies', which is part of the yearly financial agreement signed between the Commission and the national agencies.

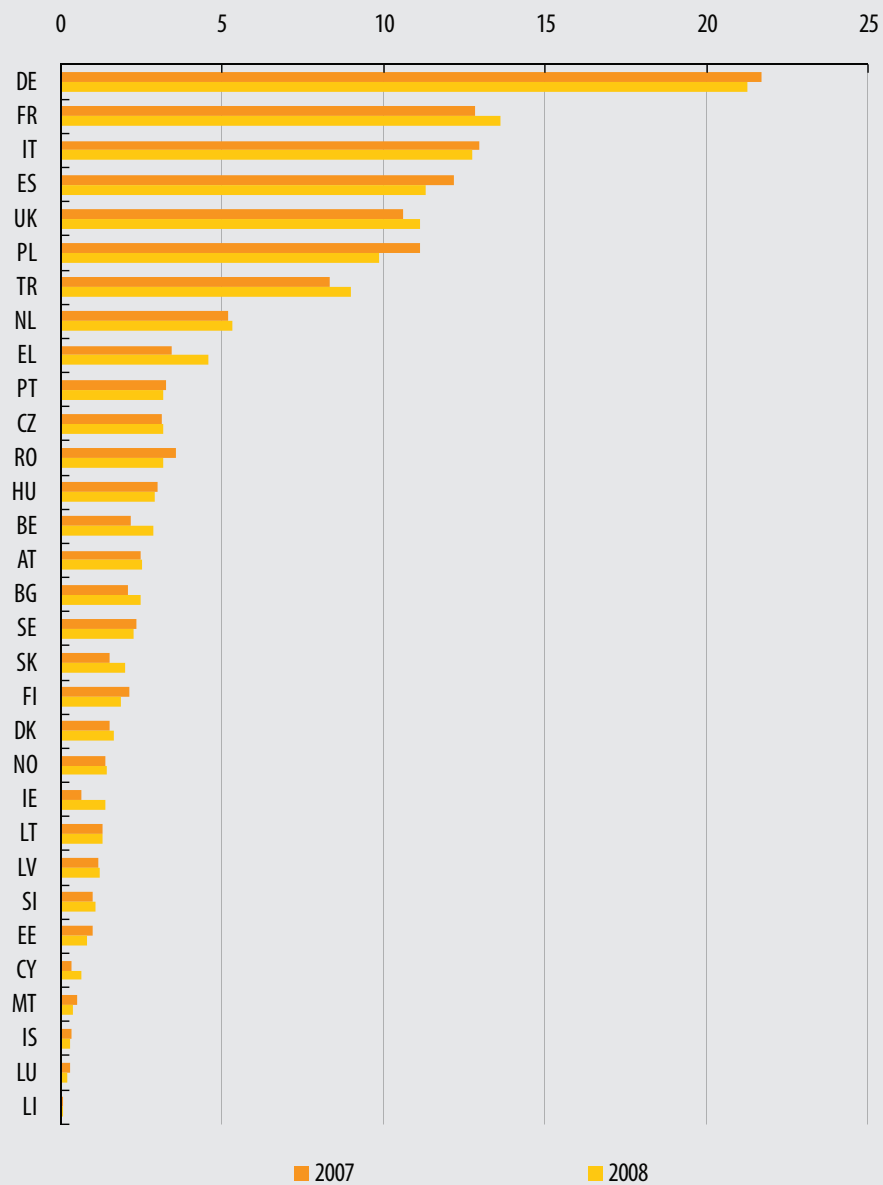
AUDIT SCOPE AND APPROACH

11. The audit focused on mobility activities funded by the Leonardo programme. The overall objective was to assess whether the design and management of the Lifelong Learning Programme's (2007–13) Leonardo da Vinci mobility scheme is likely to lead to effective results.
12. The objectives of the audit were to assess whether:
 - (a) the design of the programme took account of relevant evaluations and studies and had an appropriate project life cycle management system;
 - (b) the operational elements of the programme, including the preparation of annual work programmes, the process of publicity, promotion and provision of information and selection of projects to be funded, were well managed;
 - (c) there was a reporting system in place which enabled the Commission to measure the results and impact of the programme; and
 - (d) the system of control was adequate.
13. The audit covered the preparation of the Lifelong Learning Programme, which started in 2004, and the actual execution of the programme in 2007–08. Relevant developments in 2009 have also been taken into account. In addition to an audit at the Commission, six Member States⁸ were visited. 45 % of total Leonardo mobility funds were allocated to them in 2007 and 44 % in 2008 (see **Graph 3**).
14. Since Leonardo is part of an integrated Lifelong Learning Programme with various educational and training initiatives under a single umbrella, many findings, conclusions and recommendations apply to the programme as a whole.
15. The audit work included the collection and analysis of data, reviews of planning, evaluation and implementation documents, an examination of mobility project files and interviews with officials from the Commission, national authorities and national agencies and with representatives of beneficiary organisations in the selected Member States.

⁸ France, Germany, Malta, Poland, Romania and the United Kingdom.

GRAPH 3

VALUE OF LEONARDO MOBILITY GRANTS BY COUNTRY AWARDED 2007-08 (MILLION EURO)



Source: European Commission.

OBSERVATIONS

DESIGN

- 16.** The audit examined whether the Commission took account, when it established the Leonardo programme, of the wealth of information available to it about its predecessor programmes, i.e. all evaluations, studies and national reports including whether national authorities made use of the national reports. It considered whether the Commission established an appropriate project life cycle management system at Commission and participating country level for implementing Leonardo, including the supporting IT system. At Commission level, it assessed whether there was a clear assignment of tasks to different units. At participating country level, it examined the administrative implementation by the national authorities and agencies charged with the programme's management, whose roles and responsibilities are set out in guidelines issued by the Commission.

⁹ Basic requirements on the scope, purpose, timing and use of evaluations are set in the Financial Regulation (Articles 27(4), 28, 33, 56(3) and 166) and its Implementing Rules (Article 21).

THE COMMISSION TOOK ACCOUNT OF ITS OWN MANDATORY EVALUATIONS OF THE PREDECESSOR PROGRAMME, BUT DID NOT SYSTEMATICALLY TAKE ACCOUNT OF OTHER IMPORTANT STUDIES AND REPORTS

- 17.** All programmes funded from the general budget of the European Union are subject to mandatory evaluation at three stages⁹:
- *Ex ante* evaluation: a report accompanies the legislative proposal for a new or renewed EU programme or action.
 - Mid-term evaluation: carried out at the halfway stage of a programme, this provides direct feedback during the course of a programme and can thus help to improve the quality of ongoing interventions. Moreover, given the lengthy lead time involved in setting up new programmes, mid-term evaluations are also very important sources of information for the design of the next generation of a programme.
 - Final evaluation: at the end of a programme.

- 18.** In designing the new Leonardo programme, the Commission took account of the results of the mid-term and final evaluations of the predecessor programme. The results of the mid-term evaluation were taken into account in the preparation of the *ex ante* evaluation. For both the mid-term and final evaluations, the Commission prepared internal action plans, setting out how the recommendations of each one would be taken into account during the initial design phase and in subsequent adjustments of the design. However, the internal action plans for the establishment of IT and SMART objectives and performance indicators have not yet brought the expected results (see paragraphs 27–29 and 48–52).
- 19.** Each participating country is required to produce its own national mid-term and final reports on the implementation and effectiveness of the programme, and its impact on the vocational training systems and arrangements in the Member States, and to submit them to the Commission. These reports must be submitted to the Commission in the context of monitoring and evaluation of the programme, and analysed and followed up in that context.
- 20.** Analysis of the final national reports was entrusted to an external contractor hired by the Commission to undertake the final evaluation¹⁰. However, the contractor was not able to analyse all the national evaluation reports, as only 19 of the 31 participating countries sent them to the Commission by the required deadline. For its part, the Commission did not undertake any separate analysis of the national reports provided after the deadline, or otherwise follow them up.
- 21.** The use made of these national reports by some national authorities was also limited. In three of the Member States visited, the recommendations were reviewed and followed up but only one of them included the recommendations in their management arrangements for the new Leonardo programme. In the other three countries visited, there was no evidence of examination of the reports by national authorities.

¹⁰ Joint report on the final evaluation of Socrates II, Leonardo da Vinci II and eLearning, 2008.

22. The Commission has carried out two major studies on aspects of mobility activities within Leonardo¹¹. The Commission states that these studies support decision-makers in their work, but it is not clear how the Commission itself exploited the useful information they contained in order to develop and improve the effectiveness of the programme.

THE COMMISSION ESTABLISHED AN APPROPRIATE SYSTEM FOR PROJECT LIFE CYCLE MANAGEMENT. THE SUPPORTING IT SYSTEM, HOWEVER, HAD SOME SIGNIFICANT OMISSIONS

23. The audit encompassed the project life cycle management system set up by the Commission and it assessed whether this system is appropriate. The Court considers this to be the case if the management of the project life cycle is clearly divided between the parties involved, the tasks are clearly described and there are supervisory measures in place.

¹¹ 'Study on the obstacles to transnational mobility facing apprentices and other young people in initial vocational training and on ways of overcoming them; also referred to as the MoVE-iT study (2007); 'Impact analysis of Leonardo da Vinci mobility measures on young trainees and employees, and the influence of socio-economic factors' (2007).

BOX 1

EXAMPLES OF RECOMMENDATIONS FOR ACTION MADE IN THE 'IMPACT ANALYSIS OF LEONARDO DA VINCI MOBILITY MEASURES ON YOUNG TRAINEES AND EMPLOYEES, AND THE INFLUENCE OF SOCIO-ECONOMIC FACTORS' (2007)

- There are still some weaknesses in the implementation of the measures in the host countries, and also in their preparation. Better preparation of projects, including involving the participants, a more careful selection of host organisations and more and better mentoring/tutoring during the mobility measures by the sending and, in particular, the host organisation, are required.
- Impact analysis of the programme should be carried out to a greater extent and on an ongoing basis. Constant evaluation of the processes should look at preparation, implementation and follow-up, and especially the process of skill development (impact), while also observing participants' needs.

- 24.** Following the launch of the new Lifelong Learning Programme in 2007, the Commission's Directorate-General for Education and Culture reorganised itself to reflect the needs of a newly integrated programme.
- 25.** Previously, there were different national agencies dealing with different educational programmes. Following the launch of the new Lifelong Learning Programme in 2007, the Commission encouraged the participating states to designate a single national agency for all subprogrammes of the Lifelong Learning Programme, and this is now the case in most countries. Mobility projects under Leonardo are directly administered by national agencies which are responsible for all aspects of management:
- promoting the programme;
 - organising the grant award procedure, including assessment of applications;
 - issuing grant agreements and transferring grant payments to successful applicants;
 - monitoring and supporting programme beneficiaries;
 - organising the dissemination of results;
 - providing feedback on how the programme is functioning and having an impact in their country.
- 26.** National agencies are overseen by appointed national authorities which are responsible for proper management of the EU funds transferred to the national agency and for monitoring and supervising the work of the national agency in cooperation with the Commission.

- 27.** In general, therefore, the structure for the management of the project life cycle is appropriate. However, there were significant weaknesses in the IT system for project management and reporting. National agencies are required to use the IT systems made available by the Commission¹². The most recent IT system developed by the Commission is LLPLink, a tool for the Lifelong Learning Programme designed to manage project life cycles electronically, from application to final payment. In parallel with LLPLink, the Commission was also developing web-based e-forms to enable applications to be submitted online, and to enable national agencies to assess, select and report on projects online. National agencies were required to use LLPLink for all new projects from 2008 onwards.
- 28.** The new supporting IT system had some significant omissions. At the time of the audit, LLPLink could satisfy only the most urgent Lifelong Learning Programme needs but the project was late and incomplete. The national agencies that wished to manage the application assessment process and reporting by using online solutions had to continue to use the old system or their local systems in parallel with LLPLink throughout 2009. In cases where there were no interfaces between LLPLink and the systems used by the national agencies, data had to be input twice, which was time-consuming and placed an additional burden on staff.
- 29.** Delays in the implementation of LLPLink have an impact on the management of Leonardo and the rest of the Lifelong Learning Programme since the system cannot provide complete and consistent implementation data from participating countries from the beginning of the programme which are necessary for measuring progress towards objectives.

¹² 2008 Guide for national agencies implementing the Lifelong Learning Programme (paragraphs 28.1. and 9.1.1.).

MANAGEMENT

- 30.** The audit dealt with aspects of the day-to-day operations of the programme. It assessed whether the procedures for agreeing on an annual work programme could provide the Commission with a preliminary assurance that the programme would be implemented in accordance with the provisions in the relevant framework documents. The audit also assessed whether the Commission and the national agencies have promoted the programme, whether the agencies have publicised the programme in accordance with guidance from the Commission and whether the main difficulty experienced by agencies in running the programme is being addressed. Lastly, it examined whether the agencies' assessment of project applications was transparent, well-organised and followed instructions from the Commission, and whether the weaknesses identified were followed up.

ARRANGEMENTS FOR APPROVING THE NATIONAL AGENCIES' ANNUAL WORK PROGRAMMES ARE APPROPRIATE, ALTHOUGH THE COMMISSION DOES NOT SYSTEMATICALLY PROVIDE THE NATIONAL AGENCIES WITH QUALITATIVE FEEDBACK THEREON

- 31.** On the basis of standardised specifications and templates provided by the Commission, each national agency prepares an annual work programme, which the Commission subsequently approves. The Commission's primary aim in approving work programmes is to gain preliminary assurance that the national agency will implement the programme in accordance with the provisions set out in the relevant framework documents. National authorities also agree to the annual work programme, thereby committing themselves to providing the national agency with the necessary national matching resources. This system works without major problems and so annual work programmes are approved within the deadlines, thereby enabling a continuous implementation of the programme along the lines agreed. Although enabling consolidated work programmes to be submitted by each national agency, the Commission has not taken the opportunity to provide the national agencies and authorities systematically with feedback on the quality of the work programme; this would provide a concise view of the planned national implementation, something which would be useful both for the Commission and for the participating countries because problems could be identified and corrected in good time.

THE COMMISSION AND PARTICIPATING COUNTRIES PUBLICISE AND PROMOTE THE PROGRAMME SATISFACTORILY

- 32.** The Commission and national agencies have fulfilled their obligations relating to promotion activities by providing visibility and by supporting the dissemination and further exploitation of good practice through a series of measures. The national agencies have publicised the 'calls for proposals' in participating countries in accordance with the guidance from the Commission and have submitted relevant supporting information about the Leonardo programme.

THE COMMISSION HAS NOT ADDRESSED APPLICANTS' DIFFICULTIES IN FINDING HOST PARTNERS IN OTHER COUNTRIES

- 33.** Applicants had difficulties finding host partners in other countries. The causes for this included a lack of language skills and cultural differences. Under Leonardo, and in common with other Lifelong Learning Programme mobility schemes, national agencies are only responsible for securing placements in foreign countries for applicants from their own country; they have no role in helping applicants from other countries to find suitable hosts.
- 34.** The Commission provides information, advice and assistance to potential applicants looking for host partners. However, in 2007 the Commission closed down its European partner-search database that was designed to facilitate the search for partners, as it could not ensure that the data on potential partners in the database were of the quality expected by its users in the participating countries. This database has not yet been replaced by a suitable alternative.

- 35.** National partner-search databases already exist in some participating countries, but these are not a substitute for a Europe-wide database. Using the respective national databases as a partner-search tool leads to a situation where those seeking partners are obliged to register with multiple databases so that they can sign in and make a search.

WEAKNESSES IN THE ASSESSMENT OF APPLICATIONS

- 36.** The procedures for assessing applications and selecting projects in the participating countries are transparent, well-organised and in line with the Commission's instructions. However, the assessments of applications showed examples of the following weaknesses which increase the risk that selected projects do not meet the aims set:
- applications were accepted even though description of the content, aims and expected results of the training were insufficient as a basis for justifying the outcome of the assessments;
 - applications were accepted even though information on costs in the applications was not sufficient to justify the amounts requested;
 - lack of comments provided by assessors to justify the marks given in each section of the assessment form, particularly on qualitative matters.
- 37.** The Commission does not conduct quality assurance reviews of project assessments of applications as it considers that this is the role of the national authority. However, the Commission had not issued specific guidelines on how the national authorities should check the assessments of applications. Without clear guidelines, there is a risk that checks by national authorities could be less rigorous in some participating countries than in others.

REPORTING

- 38.** The Commission, in cooperation with the participating countries, has to ensure the collection, analysis and processing of the available data needed to measure the results and effects of the programme¹³. This activity comes in addition to the in-depth impact assessments undertaken as part of the mid-term and final evaluations of the Leonardo programme. The audit assessed whether there was a reporting system in place based on SMART objectives which enabled the Commission to measure the results and impact of the programme against planned performance¹⁴.

THERE ARE SHORTCOMINGS IN THE SYSTEM FOR REPORTING ON THE RESULTS AND EFFECTS OF THE LEONARDO PROGRAMME

- 39.** The national agencies prepare an annual activity report for the Commission¹⁵ providing information on the implementation of the programme. The content of the report is stipulated by the Commission and covers matters such as the number and type of projects supported and their results.
- 40.** The Court examined the 2007 activity reports of the six countries visited and found a number of shortcomings, described in paragraphs 41–44. These shortcomings reduce the value of the reports as an instrument for informing the Commission and other users about the results and impact of the Leonardo programme.
- 41.** As the annual work programme is structured differently from the annual activity report, it is not possible to make a meaningful comparison of results against planned performance. The Commission plans to adapt the annual activity report structure in line with the restructuring of the work programme with effect from the 2011 working programme.

¹³ Article 6(3)(d) of Decision No 1720/2006/EC.

¹⁴ Council Regulation (EC, Euratom) No 1605/2002 of 25 June 2002 on the Financial Regulation applicable to the general budget of the European Communities, Article 27 (OJ L 248, 16.9.2002, p. 1).

¹⁵ Part 1 of the yearly report of the national agency.

42. The information on results provided by national agencies is limited to factual data that do not allow an assessment of the impact of Leonardo in terms of its objectives, e.g. improvements in teaching, the acquisition of skills and economic impacts. For example, the annual activity report includes information on the numbers of projects, but the information on the results and outcomes of the supported activities for participants and institutions is limited.
43. Furthermore, there is a lack of consistency in the national agencies' approach to annual activity reporting, with the consequence that the final reports submitted to the Commission contain different analyses of results, presented in different ways.
44. The Commission's review of the annual activity reports submitted by national agencies has focused more on completeness and coherence than on ensuring that the necessary information was reported (see paragraph 38). However, the Commission reported that it has sent feedback to the participating countries after the assessment of the 2008 yearly reports, thereby establishing a link between the *ex ante* check of the work programme and the *ex post* assessment of the annual report as of 2009.

BOX 2

EXAMPLES OF WEAKNESSES IN THE WAY NATIONAL AGENCIES PRESENTED THE RESULTS OF THE IMPLEMENTATION OF THE 2007 WORK PROGRAMME

- lack of quantitative assessment of project results;
- insufficient analysis of the way objectives were addressed;
- general potential effects described without reference to actual evidence of impact;
- examples of impacts taken from a study of the previous Leonardo II programme.

- 45.** National agencies also undertake monitoring visits to projects, the aim being to support the beneficiaries, gather and disseminate examples of best practice and establish or maintain good relations between the beneficiaries and the national agency.
- 46.** The Commission has set a requirement¹⁶ for selecting which beneficiaries should be visited, including the size and type of the beneficiary, their geographical spread throughout the country and the level of EU grant awarded. However, unlike in the case of primary controls, the Commission has not specified a minimum number of monitoring visits which the national agency should undertake.
- 47.** In 2008 the Commission introduced 'quality and impact monitoring' visits. The objective was to obtain greater insight into the quality of programme activities in the participating countries. These visits include meetings with national authorities, agencies and grant beneficiaries. Although this is a positive step, the scope of these visits is not sufficiently developed. Commission reports issued in 2008 on the outcome of these visits included facts and developments relating to mobility activities, but did not contain any analysis of the actual effects of Leonardo mobility projects on education systems, participating institutions or individuals. Reports or other feedback had not been sent systematically to the participating countries for confirmation or comment in the first two years.

THE COMMISSION HAD STARTED BUT NOT YET COMPLETED THE ESTABLISHMENT OF A COMPREHENSIVE SYSTEM FOR THE MEASUREMENT OF THE IMPACT OF LEONARDO BY THE THIRD YEAR OF THE PROGRAMME

- 48.** Programme objectives should be 'SMART' (i.e. specific, measurable, achievable, realistic and timely)¹⁷. However, this is not the case for the objectives for the Leonardo programme which are rather general, making it difficult to measure how mobility projects can contribute to them (see **Box 3**).

¹⁶ 2008 guide for national agencies implementing the lifelong learning programme, point 3.1.1.3.

¹⁷ Council Regulation (EC, Euratom) No 1605/2002 of 25 June 2002 on the Financial Regulation applicable to the general budget of the European Communities, Article 27 (OJ L 248, 16.9.2002, p. 1).

BOX 3

LEONARDO DA VINCI SPECIFIC OBJECTIVES

- to support participants in training and further training activities in the acquisition and the use of knowledge, skills and qualifications to facilitate personal development, employability and participation in the European labour market;
- to support improvements in quality and innovation in vocational education and training systems, institutions and practices;
- to enhance the attractiveness of vocational education and training and mobility for employers and individuals and to facilitate the mobility of working trainees.

LEONARDO DA VINCI OPERATIONAL OBJECTIVES

- to improve the quality and to increase the volume of mobility throughout Europe of people involved in initial vocational education and training and in continuing training, so as to increase the number of placements in enterprises to at least 80 000 per year by the end of the Lifelong Learning Programme;
- to improve the quality and to increase the volume of cooperation between institutions or organisations providing learning opportunities, enterprises, social partners and other relevant bodies throughout Europe;
- to facilitate the development of innovative practices in the field of vocational education and training other than at tertiary level, and their transfer, including from one participating country to others;
- to improve the transparency and recognition of qualifications and competences, including those acquired through non-formal and informal learning;
- to encourage the learning of modern foreign languages;
- to support the development of innovative Information and communication technology-based content, services, pedagogies and practice for lifelong learning.

- 49.** The national agencies report on the results of the programme in their annual activity reports. At the time of the Court's audit the Commission had not provided detailed guidelines to the national agencies on how to evaluate the results of the programme or how to assess the impact of mobility projects.
- 50.** In December 2006, the Lifelong Learning Programme Committee¹⁸ decided to establish a working group with the aim of assessing the impact of the whole Lifelong Learning Programme including Leonardo da Vinci. The remit of the working group included the identification of a set of common impact indicators to evaluate the success of the Lifelong Learning Programme against its objectives. In November 2009, the working group made a proposal to the Lifelong Learning Programme Committee for impact indicators and for a data collection and reporting system which would address some of the current weaknesses. However, by January 2010 the proposal had not been approved.
- 51.** Once the Commission has decided on the indicators it wants to measure, other changes will be necessary, for example the questions in the existing annual activity reports will need to be revised to ensure that they can be used for gathering the necessary statistical information for efficient management of the programme. The reporting module of the LLPLink IT system will need to be adapted to meet new data collection needs.
- 52.** The setting up of an impact assessment working group was a positive step towards creating the necessary conditions for monitoring and measuring results and impacts. However, three years into the current Leonardo programme, the Commission has not been able to assess to what extent the programme is meeting its objectives, nor does it have a system in place that would enable it to do so in the future. Even assuming that the Lifelong Learning Programme Committee approves the impact indicators in 2010, the data needed to assess the impact of the programme would only be collected for the remaining stage of the programme, and it will be very difficult to obtain comparable data for the first three years of the programme (2007–09), i.e. the period to be covered by the mid-term evaluation of the Lifelong Learning Programme, the report on which is due to be submitted in March 2011.

¹⁸ The Lifelong Learning Programme Committee assists the Commission with implementation of the programme. It comprises representatives of Member States and gives opinions on or is consulted about measures to implement the programme.

CONTROLS

- 53.** The audit dealt with the adequacy of the controls carried out in respect of Leonardo at all levels, i.e. by national agencies, national authorities and the Commission, within the framework of the Lifelong Learning Programme¹⁹. The controls carried out were considered to be adequate if they took place in accordance with the Commission's guidelines and under its supervision.

IN MOST CASES, CONTROL OVER LEONARDO BY NATIONAL AGENCIES COMPLIED WITH COMMISSION GUIDANCE

- 54.** National agencies perform 'primary controls' at beneficiary level. They are undertaken to give assurance as to the reality and eligibility of the activities supported with EU funds and as to the legality and regularity of the underlying operations.
- 55.** The standards and minimum requirements for primary controls are defined in the Commission's guide for national agencies²⁰. The controls consist of a range of activities: analysis of final reports, a desk check of supporting material submitted by beneficiaries at final report stage, an on-the-spot check during the implementation of a supported activity, a post-completion audit and a systems audit of regular beneficiaries.
- 56.** Primary controls are by definition compliance controls which are not designed to focus on the results of the mobility measures. As regards the implementation of primary controls, although national agencies generally carry out their controls in accordance with the Commission's guide for national agencies, examples of weaknesses were observed:
- at one national agency, the assessment and approval of the final reports did not respect the deadline of 45 days from receipt of the report;
 - at another national agency, final payments to beneficiaries were made without the required feedback from all the mobility participants.

¹⁹ The Court has previously reported on the audit of controls over the Lifelong Learning Programme. See Annual Report of the Court of Auditors concerning the financial year 2008 (OJ C 269, 10.11.2009, p. 181–185).

²⁰ 2008 guide for national agencies implementing the Lifelong Learning Programme, point 3.8.1.

ALTHOUGH THE SECONDARY CONTROLS CARRIED OUT BY NATIONAL AUTHORITIES GENERALLY PROVIDE REASONABLE ASSURANCE THAT THE PRIMARY CONTROLS ARE EFFECTIVE, A NUMBER OF WEAKNESSES WERE IDENTIFIED

- 57.** The national authority is responsible for national controls over Leonardo. For this purpose, the Commission requires it to establish a system of secondary controls, the objective of which is to provide reasonable assurance that the system of primary controls operated by the national agencies is effective²¹. In most cases, the secondary controls carried out by the national authorities gave reasonable assurance that the system of primary controls is effective. However, the audit also showed weaknesses in the way secondary controls were carried out: inadequate documentation of supervisory procedures, insufficient supervision of the national agency and weaknesses in the follow-up of recommendations proposed by national or Commission control bodies.

THE COMMISSION ONLY RECENTLY PROVIDED COMPLEMENTARY GUIDANCE ON THE SPECIFIC PROCEDURES COVERED BY THE SECONDARY CONTROLS

- 58.** The Commission carries out 'system monitoring' visits to participating countries. These focus on monitoring compliance by national agencies' systems and procedures with Lifelong Learning Programme rules. National authorities have interpreted the meaning of 'secondary controls' in different ways. As the Court observed in its 2008 Annual Report,²² Commission guidance on the responsibilities of the national authorities lacked clarity on specific procedures. The Court's audit of Leonardo confirms this conclusion as weaknesses were found in the secondary controls. The Commission has subsequently taken corrective measures by issuing instructions to the authorities providing further guidance on procedures covered by the secondary controls.

²¹ Article 8 of Commission Decision of 26 April 2007.

²² Annual Report of the Court of Auditors concerning the financial year 2008, Chapter 9, paragraphs 9.21 and 9.33.

CONCLUSIONS AND RECOMMENDATIONS

- 59.** The Commission took account of its own mandatory evaluations in designing the Leonardo programme but did not establish action plans for other important studies and reports. The Commission established an appropriate project life cycle management system. However, the main IT system, LLPLink, was still incomplete by the end of 2009, thus hindering proper reporting and requiring the use of old systems at the same time. By mid-2010 a common reporting tool for impact measurement was still not complete for the Lifelong Learning Programme.
- 60.** The operational elements of the programme, including the preparation of the annual work programme, publicity, promotion and the provision of information, were generally well managed. Nevertheless, there were weaknesses in some areas such as helping applicants finding host partners in other countries and ensuring the quality of national agencies' assessments of grant applications.

RECOMMENDATION 1

- (a) After its analysis of the annual work programme, the Commission should provide the national authorities with qualitative feedback. This feedback should provide a concise view of national implementation and should highlight strengths and weaknesses, something which would be useful both for the Commission and the national authorities.
- (b) The Commission should explore options to ensure a user-friendly and effective partner-search tool, either at EU or at national level.
- (c) The Commission should consider whether national agencies should facilitate the placements of foreign participants by providing other national agencies with information about hosting and intermediary organisations in their own country.
- (d) The assessment of applications could be improved by further developing the assessment handbook for evaluators, specifying in detail, for each section defined in the assessment form, the purpose of the evaluation and the methods to achieve this.

- (e) In order to ensure consistent interpretation of Commission rules, the Commission should consider including checks of assessments of applications in its quality and impact monitoring visits to participating countries.
- (f) The Commission should finalise the LLPLink application for reporting on impact measurement without further delay in order to guarantee collection of complete, consistent implementation data from all participating countries.

61. Although control systems at Commission and Member State level were adequate in most cases, their reporting systems did not focus sufficiently on the programme's results, and even less on its effectiveness and impact. The Commission had started but not yet completed the establishment of a comprehensive system for the measurement of the impact of Leonardo by the third year of the programme. As a result, the Commission has not been in a position to measure the impact of the first three years of Leonardo — around half its lifespan.

RECOMMENDATION 2

- (a) The Commission should improve its 'quality and impact monitoring system' and coordinate it with the annual activity reporting currently carried out by the national agencies.
- (b) The Commission should align the structure of the work programme and the annual report so as to enable a comparison of results against planned performance.
- (c) The Commission should finalise its work on setting SMART objectives and performance indicators without further delay.
- (d) In the future, the Commission should ensure that for any successor programme a system for measuring impact is set up from the outset.

62. The overall conclusion is that the design and management of the mobility scheme of the Leonardo da Vinci programme could lead to effective results. The Commission had started but not yet completed the establishment of a comprehensive system for the measurement of the impact of Leonardo. As a result, the Commission cannot yet assess how the objectives are being met three years into the programme — around half of its lifespan.

This Report was adopted by Chamber IV, headed by Mr Morten LEVYSOHN, Member of the Court of Auditors, in Luxembourg at its meeting of 29 June 2010.

For the Court of Auditors



Vítor Manuel da SILVA CALDEIRA
President

OBJECTIVES (BASED ON THE LEGAL BASE OF THE LIFELONG LEARNING PROGRAMME)

DECISION No 1720/2006/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 15 November 2006 establishing an action programme in the field of lifelong learning

GENERAL OBJECTIVES OF THE LIFELONG LEARNING PROGRAMME

- to contribute through lifelong learning to the development of the Community as an advanced knowledge-based society, with sustainable economic development, more and better jobs and greater social cohesion, while ensuring good protection of the environment for future generations.
- in particular, it aims to foster interchange, cooperation and mobility between education and training systems within the Community so that they become a world quality reference.

SPECIFIC OBJECTIVES OF THE LIFELONG LEARNING PROGRAMME

- to contribute to the development of quality lifelong learning, and to promote high performance, innovation and a European dimension in systems and practices in the field;
- to support the realisation of a European area for lifelong learning;
- to help improve the quality, attractiveness and accessibility of the opportunities for lifelong learning available within Member States;
- to reinforce the contribution of lifelong learning to social cohesion, active citizenship, intercultural dialogue, gender equality and personal fulfilment;
- to help promote creativity, competitiveness, employability and the growth of an entrepreneurial spirit;

- to contribute to increased participation in lifelong learning by people of all ages, including those with special needs and disadvantaged groups, regardless of their socio-economic background;
- to promote language learning and linguistic diversity;
- to support the development of innovative ICT-based content, services, pedagogies and practice for lifelong learning;
- to reinforce the role of lifelong learning in creating a sense of European citizenship based on understanding and respect for human rights and democracy, and encouraging tolerance and respect for other peoples and cultures;
- to promote cooperation in quality assurance in all sectors of education and training in Europe;
- to encourage the best use of results, innovative products and processes and to exchange good practice in the fields covered by the Lifelong Learning Programme, in order to improve the quality of education and training.

LEONARDO DA VINCI SPECIFIC OBJECTIVES

- to support participants in training and further training activities in the acquisition and the use of knowledge, skills and qualifications to facilitate personal development, employability and participation in the European labour market;
- to support improvements in quality and innovation in vocational education and training systems, institutions and practices;
- to enhance the attractiveness of vocational education and training and mobility for employers and individuals and to facilitate the mobility of working trainees.

LEONARDO DA VINCI OPERATIONAL OBJECTIVES

- to improve the quality and to increase the volume of mobility throughout Europe of people involved in initial vocational education and training and in continuing training, so as to increase placements in enterprises to at least 80 000 per year by the end of the Lifelong Learning Programme;
- to improve the quality and to increase the volume of cooperation between institutions or organisations providing learning opportunities, enterprises, social partners and other relevant bodies throughout Europe;
- to facilitate the development of innovative practices in the field of vocational education and training other than at tertiary level, and their transfer, including from one participating country to others;
- to improve the transparency and recognition of qualifications and competences, including those acquired through non-formal and informal learning;
- to encourage the learning of modern foreign languages;
- to support the development of innovative ICT-based content, services, pedagogies and practice for lifelong learning.

REPLY OF THE COMMISSION

EXECUTIVE SUMMARY

I-III.

The Commission welcomes the overall conclusion of the Court of Auditor's report that the design and management of the mobility scheme of the Leonardo da Vinci programme could lead to effective results.

Indeed, the programme shows increasing demand which at present can be only partly covered (less than 50 % of applications can be awarded within the available budget). More than 80 000 people were financed in 2009 (67 % persons in initial training, 20 % people on the labour market, 13 % teachers/trainers). By far the majority of participants (nearly 90 %) expressed themselves as highly satisfied with the stay abroad in their final reports.

The positive impact on participants in the previous programme has been confirmed by the impact study published in 2007. The mobility experiences improved the skills and competences of young people and positively influenced their employability, as well as their personal development. A study on the impact of the Leonardo mobility of teachers and trainers in vocational education (Vetpro) is about to be finalised, and the initial results confirm the positive effects not only on the personal development of participants but also on the vocational education and training schools, training providers and systems.

REPLY OF THE COMMISSION

The Commission welcomes the Court's acknowledgement that an appropriate project life cycle management system has been established and that the operational aspects of the programme were generally well managed. The Commission underlines the fact that many of the management recommendations are valid for the whole Lifelong Learning Programme (LLP), because the Leonardo programme forms an integral part of the LLP.

IV.

The Commission stresses that the audit mainly covered the years 2007–08, which were the first two years of a new integrated programme. Furthermore, the programming and reporting cycle with national agencies covers two years from the national agency's preparation of the draft work programme to the finalisation of the yearly report assessment by the Commission. Therefore, improvements made afterwards, notably in 2010, have not all been taken into account by the Court.

In addition, it has to be noted that results of actions co-financed in 2007–08 are often not visible immediately after the actions, as mobility and training normally take several years to show their effects.

IV. First indent

For the design of the current Leonardo da Vinci programme, the Commission launched a consultation process with national agencies, national authorities and stakeholders to take into account earlier experiences. The Commission took into consideration not only the findings and suggestions from the mandatory evaluations, but also used other external studies as a source of ideas and to provide additional insight.

IV. Sixth indent

The Commission is aware that the quality of secondary controls by national authorities on national agencies varies, as was also pointed out by the Court in its Statement of Assurance for the financial year 2008. Following this earlier observation from the Court, the Commission has taken action and developed detailed guidelines for national authorities in order to provide both methodological support and practical tools for the secondary controls by the national authorities. These guidelines were issued to the Member States in December 2009 and were also the main subject of a seminar for national authorities held in March 2010 in order to remedy the weaknesses found.

IV. Seventh indent

The Commission accepts that the work on performance indicators has to be finalised.

It underlines, however, that the work with the programme committee on the establishment of indicators started already in 2007. Furthermore, based on the impact studies and evaluations of the previous Leonardo programme and the available quantitative data and the qualitative feedback from participants in the current programme, the Commission is confident that the Leonardo da Vinci mobility programme is producing effective results.

REPLY OF THE COMMISSION

V.

The Commission accepts the recommendations made by the Court and has already implemented them in full or partially, including: the qualitative feedback to national authorities on the yearly national agency reports, the integration of the yearly activity reports into the monitoring visits, the alignment of the annual activity report structure with the work programmes, the inclusion of results-oriented indicators in national agencies' work programmes and the finalisation of LLPLink.

The Commission wishes to underline that:

- it has already vastly improved the supporting IT system for the management of the programme in 2009 and is further improving its reporting facilities in 2010;
- it already provides qualitative feedback on the yearly work programmes of the national agencies, but for effectiveness reasons it has limited its feedback to those cases that require revision because they do not correspond to the expected quality standards;
- it shares the Court's view that support in finding partners is important and it is exploring other options, since the traditional partner-finding database did not deliver the quality service expected;
- it has already developed detailed guidelines for assessing project applications. The Commission considers that the supervision of the quality assessment of applications is part of the remit of the national authorities' secondary controls of national agencies; nevertheless, it is testing whether it can monitor these procedures more closely, taking due account of cost-efficiency;
- it included performance indicators in the set-up for the 2011 national agency work programmes, which were welcomed by the national agency directors at their meeting of 20 May 2010 and will therefore be applied as of the planning and reporting period 2011;
- the Commission accepts that the work on performance indicators needs to be finalised. It underlines, however, that the work with the programme committee on the establishment of indicators started already in 2007. The Commission's proposal was adopted by the committee at its meeting of 17 June 2010. On this basis, the relevant data will be matched with the now established indicators; the first results of this exercise are expected by mid-2011. Furthermore, based on the impact studies and evaluations of the previous Leonardo programme and the available quantitative data and the qualitative feedback from participants in the current programme, the Commission is confident that the Leonardo da Vinci mobility programme is producing effective results.

REPLY OF THE COMMISSION

AUDIT SCOPE AND APPROACH

13.

The Commission highlights the fact that 2007 and 2008 were the first two years of the Lifelong Learning Programme which, for the first time, integrated Leonardo da Vinci and the former Socrates programme into a single programme. As a consequence, new common procedures had to be put in place. Furthermore, the programming and reporting cycle with national agencies covers two years from the preparation of the work programmes by national agencies to the finalisation of the yearly report assessments. Therefore, improvements made afterwards, notably in 2010, have not all been taken into account by the Court.

OBSERVATIONS

16.

The Commission underlines the fact that results of actions supported in 2007–08 are often not visible immediately after the actions, as mobility and training normally take several years for their effects to be seen.

18.

The Commission welcomes the Court's finding that, in designing the new Leonardo programme, the results of the mid-term and final evaluations of the predecessor programme were taken into account by means of structured action plans.

Starting in 2007, the Commission has been extensively discussing with the programme management committee a set of programme impact indicators applicable to the LLP as a whole. The committee expressed 'no opinion' on two proposals tabled by the Commission and asked for further analysis on cost-effectiveness. The new proposal was adopted by the committee at its meeting of 17 June 2010. On this basis, the relevant data will be matched with the now established indicators; the first results of this exercise are expected by mid-2011.

19.–20.

The Commission maintains that it is not its role to follow up whether the recommendations set at national level have been followed up by the national authorities. However, the Commission could invite national authorities to undertake such follow-up at national level.

The Commission emphasises that the final national reports that were presented in due time by the national authorities had been submitted to the external contractor for analysis and the results have been validated by the Commission. Cross-cutting issues have been included in the final action plan established by the Commission.

REPLY OF THE COMMISSION

22.

The Commission considers that external studies which are not formal evaluations of the programme do not require the drawing-up of action plans.

The content of external studies such as the study on obstacles to transnational mobility 'MoVE-iT' and the impact analysis of Leonardo da Vinci mobility on young trainees and employees, which are quoted by the Court, is used as background information and as a source of ideas for further development or adaptation of the programme and its rules. They also provide a more detailed insight into certain aspects of the programme actions.

Box 1. First indent

The Commission agrees that there is still room for improvement in the implementation of the programme in the host countries and in the preparation of participants, as pointed out in the recommendation of the impact study mentioned. However, the study also concludes that the fundamental principles and mechanisms of the programme neither need nor ought to be changed. The study concludes that: 'the Leonardo da Vinci mobility programme can be described as particularly efficient, effective and cost-effective.'

27.

The Commission welcomes the Court's overall appreciation of the management of the project life cycle for the programme.

As the Court points out, the supporting IT system could be improved. The Commission notes that a totally new IT system, covering a multiplicity of subprogrammes and actions, had to be put in place for the new LLP, of which Leonardo da Vinci is only a part. In the meantime, the quality of implementation reporting has increased and is now robust. Furthermore, eight electronic application forms were offered for the 2010 call, two report forms are in production and three more are due to be put into production in 2010. The overwhelming majority of Leonardo da Vinci applications are thus being treated electronically in 2010, thereby increasing efficiency and reducing the scope for manual input errors.

28.

The Commission reiterates that, with regard to IT systems, important developments took place in 2009 and continued in 2010. Improvements made after the Court's audit, notably in 2010, have not all been taken into account by the Court.

29.

Since the start of the LLP, the Commission has continued to gather quantitative data and qualitative feedback from participants on Leonardo da Vinci mobility through Rap4Leo¹, resulting in an uninterrupted and reliable data series for the programme.

In addition, the Commission underlines that, since the end of 2008, LLPLink has been used for the production of uniform and standardised financial reports and management statistics. The combination of the statistical data from Rap4Leo and LLPLink ensures the quality and coherence of data for Leonardo da Vinci mobility.

¹ Rap4Leo is an IT tool that makes it possible, among other things, to collect quantitative data and the opinions of participants in Leonardo da Vinci mobility actions.

REPLY OF THE COMMISSION

Starting in 2007, the Commission has been extensively discussing with the programme management committee a set of programme impact indicators applicable to the LLP as a whole. The committee expressed 'no opinion' on two proposals tabled by the Commission and asked for further analysis on cost-effectiveness. The new proposal was adopted by the committee at its meeting of 17 June 2010. On this basis, the relevant data will be matched with the now established indicators; the first results of this exercise are expected by mid-2011.

31.

The Commission welcomes the Court's finding that arrangements for approving the national agencies' annual work programmes are appropriate.

For reasons of cost-effectiveness, the Commission has limited its feedback to national agencies on their draft annual work programme to those cases requiring revision, in order to ensure that the expected quality standards are achieved.

The Commission underlines, however, that it does provide the national authorities and national agencies with detailed qualitative feedback on programme management and implementation in its evaluation conclusions of the yearly national agency report, in which it also indicates expected remedial action, as needed. The Commission also checks that remedial actions are included in the following national agency work programme, to ensure a continuous improvement in programme implementation.

32.

The Commission welcomes the Court's opinion that the participating countries and the Commission publicise and promote the programme satisfactorily.

33.-35.

The Commission is aware of difficulties on the part of some applicants in finding host partners in other countries, and notes the suggestion to facilitate this process. The previous partner-search database which existed under the Leonardo da Vinci II programme was closed down because it could not ensure a sufficient quality of data entries into the system. Other solutions have to be explored as suitable alternatives. A promising example is the EuroApprenticeship network and platform, set up by competent bodies including chambers of crafts or commerce and vocational education and training providers, which started in 2010 following a call for proposals, and which may be better suited to address the issue of finding quality host enterprises. The Commission considers that such alternatives could be explored for the next programme generation.

36.

The Commission is pleased to note that the procedures for assessing applications and selecting projects in the participating countries are found to be transparent, well-organised and in line with the Commission's instructions.

It stresses that the rules of procedure in the guide for national agencies are designed to give sufficient assurance on the quality of the selected grants.

REPLY OF THE COMMISSION

37.

As established by the Commission's updated guidelines issued in 2009, a quality assurance check on the assessments of grant applications should be part of the secondary controls on the national agencies by the national authorities. The grant award procedure — of which the assessment of grant applications is an important element — is part of the 'key controls' on which the national authorities have to express their opinion in their yearly declaration of assurance.

41.

A revised setup for the national agency work programmes has been designed for 2011, including targets and performance indicators which will further facilitate meaningful comparison of results against planned performance. The new approach was welcomed by the national agency directors at their meeting of 20 May 2010 and will thus be implemented for planning and reporting as of 2011.

43.

In order to address the lack of consistency in the national agencies' approach to annual activity reporting, the Commission has provided a single online report form for use by all national agencies. In addition, based on the experience of previous years, the Commission provided detailed instructions for completion of the yearly reports in 2009.

Box 2

The Commission underlines that the weaknesses found by the Court in the way in which national agencies presented the results of the implementation of the 2007 work programmes refer to three out of the six national agencies examined and did not systematically occur in each of the three.

44.

From the 2008 annual activity reports onwards, the Commission has already sent extensive evaluation conclusions to the national authorities and national agencies. These evaluation conclusions provide detailed feedback on the quality of the programme implementation and management in the country concerned, and aim to guide national agencies so that they improve their performance. Thus, a direct link is established between the national agency work programme and the annual activity report.

46.

National agencies are indeed required, as the Court notes, to undertake monitoring activities to support programme beneficiaries, in addition to checks of beneficiaries which focus on ensuring correct use of EU funds. In a context of limited resources in national agencies, and considering the substantial control requirements, the Commission did not consider it appropriate to set minimum requirements for national agencies for monitoring visits of beneficiaries. This allows national agencies to organise the monitoring of beneficiaries in the most effective and appropriate way, taking national contexts and constraints into consideration, for example replacing monitoring visits to individual beneficiaries with monitoring meetings bringing together groups of beneficiaries.

REPLY OF THE COMMISSION

47.

The concept of 'quality and impact monitoring visits' was newly introduced in 2008 and has been gradually improved since then in order to gain firm assurance of the effects of the programme on the basis of examples of actual projects. Feedback has been sent to national agencies on a regular basis since August 2008. For the second round of Leonardo da Vinci quality and impact monitoring starting in 2010, visits will have a more regional focus.

48.

The objectives of the Leonardo programme are specified in the legal basis of the Lifelong Learning Programme, which has been agreed by the European Parliament and the Council. The Commission is working on developing suitable indicators for these objectives for the LLP as a whole. This is a particularly complex exercise, given the fact that 58 objectives have been stipulated in the legal basis. The Commission accepts that the overall system for reporting on the results, effects and impact based on performance indicators has yet to be finalised. However, at its meeting of 17 June 2010, the LLP Committee adopted the approach proposed by the Commission.

The Commission stresses, however, that evidence from the external studies on the effects of Leonardo mobility for young trainees and graduates² and the impact of Vetpro mobility on individuals and systems³ indicates that Leonardo mobility fulfils the programme objectives to a large extent.

² http://ec.europa.eu/education/pdf/doc218_en.pdf

³ Final report will be published soon.

It also points out that a large set of quantitative data are available in the Rap4Leo and LLPLink databases. Rap4Leo in addition contains qualitative feedback from participants that shows a very high degree of satisfaction with their Leonardo experiences.

49.

In order to improve the quality and coherence of annual reporting by national agencies, the Commission provided them with extensive guidelines thereon in 2009.

50.

With regard to the development of impact indicators for the Lifelong Learning Programme, the LLP Committee adopted the revised approach proposed by the Commission at its meeting of 17 June 2010.

51.–52.

Since the start of the LLP, the Commission continued to gather quantitative data and qualitative feedback from participants on Leonardo da Vinci mobility through Rap4Leo, resulting in an uninterrupted and reliable data series for the programme.

In addition, the Commission underlines that, since the end of 2008, LLPLink has been used for the production of uniform and standardised financial reports and management statistics. The combination of the statistical data from Rap4Leo and LLPLink ensure the quality and coherence of data for Leonardo da Vinci mobility.

REPLY OF THE COMMISSION

Starting in 2007, the Commission has been extensively discussing with the programme management committee a set of programme impact indicators applicable to the LLP as a whole. The committee expressed 'no opinion' on two proposals tabled by the Commission and asked for further analysis on cost-effectiveness. The new proposal was adopted by the committee at its meeting of 17 June 2010. On this basis, the relevant data will be matched with the now established indicators; the first results of this exercise are expected by mid-2011.

56.

The Commission is aware of the fact that many national agencies have weaknesses in their management of primary checks. This is pointed out formally to the national authorities and national agencies in the observations and recommendations issued after the analysis of the yearly national agency reports, as well as following monitoring and audit visits on the spot. As primary checks are an important element for a reasonable assurance on the use of EU funds, the Commission monitors weaknesses in this area very closely and sees to it that appropriate remedial action is taken at national level.

56. First indent

The Commission is aware that in one national agency visited by the Court in the context of this audit the 45-day deadline for assessment and approval of the final reports is not respected. The Commission itself has made an observation and recommendation on this issue following its systems monitoring visit to the country in 2008.

56. Second indent

The example found by the Court of final payments to beneficiaries having been made without the required feedback from all mobility participants is confined to one national agency only.

58.

The Commission has provided guidance to national authorities on the required secondary controls since 2008. Based on the experience of the first two years of the programme and the Commission's own supervisory audits, as well as in the follow-up of the Court's recommendation in the context of the DAS 2008, the Commission has complemented these guidelines in 2009 with specific procedures for secondary controls.

CONCLUSION AND RECOMMENDATIONS

59.

The Commission welcomes the Court's conclusion that it established an appropriate project lifecycle management system for the Lifelong Learning Programme.

The Commission took into consideration not only the findings and suggestions from the mandatory evaluations, but also those from external studies. However, the main purpose of external studies and reports is to provide the Commission with background information and analysis; nevertheless, their status is substantially different from the mandatory evaluations required by the legal basis. Thus, the Commission is not obliged to follow them up in the same formal way as mandatory evaluations.

REPLY OF THE COMMISSION

Although the Commission's IT system, LLPLink, was still incomplete at the time of the Court's audit, as its development started in 2008, the system is currently stable and functioning properly, and the quality of data has been vastly improved by the introduction of electronic forms. At the same time, the parallel use of a specific tool for Leonardo mobility has ensured that no data loss has occurred, and the Commission has continued to collect all necessary data on the action without any gaps since the predecessor programme.

60.

The Commission welcomes the Court's appreciation of operational elements such as the yearly work programme of the national agencies, information, publicity and promotion of the programme.

The Commission discontinued its previous partner-finding database due to quality assurance problems. While alternative solutions to partner-search mechanisms are currently being analysed, the Commission has emphasised that the lack of a partner-search database, for example, does not prevent successful programme implementation as demand far exceeds the budget available to support Leonardo mobility projects.

As established by the Commission's updated guidelines issued in 2009, a quality assurance check on the assessments of grant applications should be part of the secondary controls on the national agencies by the national authorities.

Recommendation 1(a)

The Commission accepts Recommendation 1(a), which is already being implemented. The Commission has provided national agencies with qualitative feedback since the 2008 annual reporting. Furthermore, as the Court recognised, it has also provided feedback on annual work programmes for those cases where revision was needed in order to reach the expected quality standards.

Recommendation 1(b)

The Commission partly accepts Recommendation 1(b). The Commission discontinued its previous partner-finding database due to quality assurance problems. While alternative solutions to partner-search mechanisms are currently being analysed, the Commission emphasises that the lack of a partner-search database, for instance, does not interfere with the successful implementation of the programme, as the demand by far exceeds the budget available to support Leonardo mobility projects.

Recommendation 1(c)

The Commission considers that national agencies should not have a formal role of facilitating placements for participants from other countries as this would entail a major shift in responsibilities and implications for the legal relationships between organisations from other countries. This will not prevent them from having an exchange of suitable intermediaries on an informal basis.

REPLY OF THE COMMISSION

Recommendation 1(d)

The Commission accepts Recommendation 1(d). The Commission is working on further developing the assessment handbook for evaluators in connection with the new online application and revised assessment form.

Recommendation 1(e)

The Commission notes with regard to Recommendation 1(e) that it is currently revising its approach to the quality and impact monitoring visits, by integrating a small sample check of quality assessments of applications by national agencies. Subsequently, the Commission will analyse the added value of such checks and their impact on resources from the point of view of the cost-effectiveness of controls.

Recommendation 1(f)

The Commission accepts Recommendation 1(f).

61.

The Commission welcomes the Court's assessment of the control systems in place at Commission and national levels. These control systems focus on providing assurance on the use of EU funds on a yearly basis.

The Commission is informed of the programme results on a regular basis via the yearly national agency reports on programme management and implementation as well as via its quality and impact monitoring visits.

The Commission stresses that it continued to gather quantitative data and qualitative feedback from participants on Leonardo da Vinci mobility through Rap4Leo, resulting in an uninterrupted and reliable data series on these aspects since the start of the programme. Pending a decision of the programme committee on the impact indicators, it is not yet clear to what extent the data will fulfil the need of these indicators.

The Commission underlines that impacts, however, can only be measured over time. The Member States are expected to report on the first part of the programme in their interim evaluation due in 2010. This input will be timely for enhancing the performance of Leonardo, both in the current programme and for the preparation of the new programme generation.

In addition, the Commission underlines that, since the end of 2008, LLPLink has been used for the production of uniform and standardised financial reports and management statistics. The combination of the statistical data from Rap4Leo and LLPLink ensure the quality and coherence of data for Leonardo da Vinci mobility.

Starting in 2007, the Commission has been extensively discussing with the programme management committee a set of programme impact indicators applicable to the LLP as a whole. The Committee expressed 'no opinion' on two proposals tabled by the Commission and asked for further analysis on cost-effectiveness. The new proposal was adopted by the committee at its meeting of 17 June 2010. On this basis, the relevant data will be matched with the now established indicators; the first results of this exercise are expected by mid-2011.

REPLY OF THE COMMISSION

The Commission, based on the above elements as well as on the impact studies, considers that it has sufficient assurance on the effectiveness of the programme.

Recommendation 2(a)

The Commission accepts Recommendation 2(a) and underlines that the evaluation conclusions of the annual activity reporting of the national agencies are duly integrated in the Commission's monitoring visits of national agencies.

Recommendation 2(b)

The Commission accepts Recommendation 2(b) and will align the annual activity report structure with that of the national agency work programmes after the revision of the work programme structure due in 2011.

Recommendation 2(c)

The Commission accepts Recommendation 2(c). The Commission's revised proposal was adopted by the LLP Committee at its meeting of 17 June 2010. On this basis, the relevant data will be matched with the now established indicators; the first results of this exercise are expected by mid-2011.

Recommendation 2(d)

The Commission accepts Recommendation 2(d) and will endeavour to establish a system for measuring the impact of the successor programme in a timely manner.

The Commission underlines that impact cannot be measured from the outset, but only after a certain period of programme implementation. This is normally done on the basis of studies and evaluations. The fact that the present legal basis of the LLP contains 58 objectives was a particular factor of complexity and did not facilitate the task of defining suitable indicators.

62.

The Commission welcomes the overall conclusion of the Court of Auditor's report that the design and management of the mobility scheme of the Leonardo da Vinci programme is instrumental to achieving effective results.

It has already started work and made progress on several points highlighted by the Court, such as qualitative feedback regarding the annual programming of work, the assessment of applications and the improvement of the IT tool.

The Commission accepts that the work on performance indicators needs to be finalised.

It underlines, however, that the work with the programme committee on the establishment of indicators started already in 2007. Furthermore, based on the impact studies and evaluations of the previous Leonardo programme and the available quantitative data and the qualitative feedback from participants in the current programme, the Commission is confident that the Leonardo da Vinci mobility programme is producing effective results.

European Court of Auditors

Special Report No 4/2010

Is the design and management of the mobility scheme of the Leonardo da Vinci programme likely to lead to effective results?

Luxembourg: Publications Office of the European Union

2010 — 44 pp. — 21 × 29,7 cm

ISBN 978-92-9207-796-9

doi:10.2865/76038

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THE MOBILITY PROJECTS OF THE LEONARDO DA VINCI PROGRAMME ENABLE ORGANISATIONS INVOLVED IN VOCATIONAL EDUCATION AND TRAINING TO SEND PARTICIPANTS TO ANOTHER EUROPEAN COUNTRY, THUS GIVING THEM THE CHANCE TO IMPROVE THEIR COMPETENCES, KNOWLEDGE AND SKILLS. THIS REPORT FOCUSES ON THE DESIGN OF THE PROGRAMME, ITS MANAGEMENT SYSTEM, PROGRAMMING, OPERATIONAL ELEMENTS, CONTROLS, REPORTING AND MEASUREMENT OF ACHIEVEMENT OF OBJECTIVES, RESULTS AND IMPACTS. THE REPORT CONTAINS RECOMMENDATIONS WHICH ARE AIMED AT HELPING THE COMMISSION TO IMPROVE THE MANAGEMENT OF THE PROGRAMME.



EUROPEAN COURT OF AUDITORS



Publications Office

ISBN 978-92-9207-796-9



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