

**MORAIS BISMARQUE GASPAR Ana Gloria**

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**From:** GOREY Ana [REDACTED]  
**Sent:** 29 March 2014 11:36  
**To:** Euro-Ombudsman  
**Cc:** [REDACTED]  
**Subject:** RE: Own Initiative Inquiry: OI-9-2013-TN  
**Attachments:** An ECI that works - MEET.doc

**Follow Up Flag:** OI/9/2013/TN  
**Due By:** 04 April 2014 08:30  
**Flag Status:** Flagged

Good morning,

Please find our comments to your questions. Also, please find attached our paper for a publication which will come out soon.

Best regards  
Ana Gorey

1. ECI not well known at all other than by a few Europhiles working in the institutions or similar. The whole point of the ECI was to bring it to the ordinary citizen. To raise awareness about the ECI, needs to have a more coherent vision, be part of a global community like Avaaz, not just a collection of individual go it alone actions.
2. The procedure is so complicated that it is beyond the understanding of an ordinary citizen. The legal issues are very complex and unnecessarily so. The Commission helps with their own complicated rules and forms but they are in Brussels. They don't help with anything like putting you in touch with organisations they know dealing with the same topics, or connecting you to existing activities in the field. So unless you are already a network all over Europe.. it is a daunting process. Plus, the Commission were unable to give proper legal replies on data protection for example.
3. The online software has to be of such a high level of security that it cannot be hosted by an ordinary citizen. Nor can an ordinary citizen know enough about the technical aspects of hosting to do anything but trust others.. but they would then bear the responsibility of any failure to protect data. The Commission must host the on-line collection system to guarantee all legal process. The problem then is that what they have set up is so badly designed, user unfriendly, complicated and off putting. There are also updates that the ordinary citizen can't really grasp. There is also no way to easily connect from their main page about the ECI's to the individual ECI sign up page.
4. We received an extension but only from an arbitrary date of 1 November.. rather than the date each ECI managed to finalise things.
5. You cannot use the paper form. End of story. I would like to know how other ECI's controlled this. Who was collecting the paper signatures, did they collect in couples so as to ensure nobody could steal the papers, where did they store it, what happens if accidentally it was left on a bus.. The risks to data protection are too high and the ECI is directly responsible regardless of which country it happened in..
6. When people want to sign, they do not necessarily have all the information with them.. and it takes a long time to fill out..
7. An ECI is not just about signatures.. you get regular updates of how many.. but you cannot use the information to contact those people with updates on the ECI.. there is no way on the form for them to request further information. So there is no way you can create a community of fellow thinkers. The Commission at one point made the number

of signatories for each ECI public with no authority from us. Fortunately, on contacting them they immediately turned this off.

8. We informed all the member states about our ECI and contacted all the data protection authorities in each country and they really didn't know quite what to do about an ECI..


9. Main change would be to reduce the data requirements which would solve many issues regarding data protection. an ECI is not introducing legislation or electing anyone so it is not necessary to have such high data requirements. Also, as it is a European initiative, there should be the same requirements for everyone.. many europeans, especially those living in other countries, had problems signing as some countries required nationality and others residence..

10. Please see attached paper on our experience of an ECI.

I look forward to the results of your questionnaire

Best regards  
Ana Gorey

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From: Euro-Ombudsman [<mailto:>   
Sent: mercredi 18 décembre 201  
Subject: Own Initiative Inquiry: OI-9-2013-TN

Dear Madam/Dear Sir,

Please find attached a letter from the European Ombudsman.

The Registry

MEET for “An ECI that works!”

MEET - Movement towards a European Education Trust - is the 8<sup>th</sup> European Citizens Initiative for a **“High Quality European Education for All”**. MEET believes that Europe’s future depends on Education, how to educate citizens, how they learn. Common education goals reflecting European basic values opening the minds of the future Europeans children growing up with tolerance for languages and cultures, celebrating diversity should be at the heart of a solution to today’s challenges. MEET called the creation of a **multi-stakeholder platform on Education** - not so much to discuss more about education but rather bring existing recommendations together and see how best to implement them by creating a **European** educational model, accessible to all children and teachers in all Member States.

MEET’s intention was to use the European Citizen’s Initiative to raise awareness about a quality, pluralistic educational model for all Europeans. Also about European schooling leading to the European Baccalaureate, a system of European Education started in 1953 by parents and teachers and which has produced already syllabi created by teacher from all over Europe and approved by the Ministries of education of all member states and their inspectors.

We knew a million signatures in 12 months was an impossible task and one, we would not achieve. However, signatures were not our main objective. Our task was to raise awareness about European Education and 2013 coincided with the 60th anniversary of European schools and the European Year of Citizens as well as the run up to the new legislature of the European Parliament and Commission (2014-2020). Using the ECI was successful in so far as it acted as an added attraction, helping us to connect to others working in the field and to widen our network. We had a core Campaign team, which worked at European level and in centralising the message, key communication tools, images and strategy. The Campaign team had a lot of experience with the European Institutions, which proved invaluable. MEET Country Coordinators worked mainly in their own country with their networks, as well as with other members, and mostly on specific issues they identified. This was extremely important as each country has different national issues with regard to education, approaches to pedagogy, curriculum, teaching, student and parent involvement. Also, they needed to communicate in their own language. Discussions with Country Coordinators were crucial to getting the wider picture about what was really happening with Education in Europe.

The MEET ECI Campaign was a rewarding experience, even though, as expected, we did not reach 1 million signatures - not even close - not even a tenth or a hundredth of that.

Naturally, we have reflected on how we could have done more, done better and quicker. Although MEET had a fair share of contacts, pledge partners ready to put up some basic funding, experienced professionals and experts ready to devote their time and energy, although its official page on the ECI site was in all 24 languages and had good Website and active Facebook/twitter accounts, at the end of the day, it boiled down to the message. What was MEET actually asking the Commission to do? MEET was asking to start a discussion at European level and set up a multi-stakeholder platform on European Education, anything else would have been outside the Commission’s competences. This in itself is not an easy message - yet another European platform rather than specific changes in legislation or call for a change in policy.

Also, Education itself is not a simple message - *European* Education even less so, especially in times of such widespread disenchantment with Europe, with national governments and even democracy. There are many perspectives to be taken into account, differing from country to country. In addition, Education is a national competence, fiercely guarded by those who unfortunately often use it to propagate their own national interests. We have come across such attitudes and alternative ones throughout our campaign. In fact, that is the enriching part of what we have learnt and should be an integral part of a European Citizens' Initiative. Not all ECI's have a "sexy" topic or one that can be summed up in a simple yes/no answer, or a 140-character tweet.

The existing European Education ending in a European Baccalaureate is also a hard message to communicate surrounded, as it is, by the stigma of being an elitist education only accessible to children of those working for the European Institutions even though, since the 2009 reform, it has started to open up encouraged by Ministers of Education and the European Parliament.

Are we ready to find our own solutions to implement a platform for a common educational framework? Yes. We launched a competition "*A high quality European Education for all. If you could change education in Europe....what would you do?*" and received very interesting papers. The winner proposes a solution for the implementation of a common educational tool, an online learning platform, which answers our desire to give equal chances to education also for disadvantaged groups, to use advances in technology to promote an innovative education system that will eliminate discrepancies in economic, politics or social background. A virtual education platform that will allow schools, educators, students and related authorities to work together, share knowledge and create a common curriculum, a framework enabling students from all over Europe not to be the same, but become different, flexible and knowledgeable in a world governed by change.

At its MEETing - one year after the launch of the ECI - it was decided to continue the ECI efforts by launching a project for a virtual European education platform and furthermore, to focus on raising awareness on disability and social inclusion, by implementing "*Welcome to my world*" workshops for schools (primary and secondary level).

Aside from the actual subject matter - Education - a lot of time was taken in dealing with the basic setting up of an ECI and even those of us with experience of the European institutions found it daunting. Twelve months is too short, unless you already have an established organisation. We always knew it would be impossible to reach the number of signatures required and that there would be many challenges ahead, however, the reality was far worse than our expectations. Lots of these issues have been brought up by the ECIs in various meetings and there are proposals for changes in 2015, however, too late for the pioneer Citizens Committees.

The ECI in its current format is not an appropriate tool for ordinary citizens as it is too legally and technically complicated, language and data requirements are too high, working across Europe is a difficult task, there is no institutional funding, signing is too complicated, the official sign page is unattractive and disconnected from official signing page, the capture test is hopelessly difficult, the total of **1 million signatures** is too high, 12 months is not long enough and worst of all, the mobile European living and working in Europe (our target group) often cannot vote as they caught between two systems (residency or ID requirements).

Data requirements are too high and complicated - this is the root of all the difficulties – as in order to protect the highly personal data requested, ECI's have to fulfil extremely high data protection criteria for the on-line collection system. Paper collection of signatures, is out of the question as is just too risky. The data controller cannot pretend to control the collection of signatures all over Europe in accordance with each national data protection system. Data protection is difficult enough, even in one's own country and language, let alone all over Europe collected by enthusiastic well-meaning citizens and ECI supporters, whom are not necessarily known to the data controller who - by the way - in the event of any breach of data, is held personally, criminally liable.

Working across Europe with partners but no mechanism to meet, not even occasionally, is very hard. Communication was inevitably in English, yet for the message to be successfully passed on at national level it has to be in the local language or even dialect. A minimum amount of centralised funding would be helpful to overcome these practical difficulties of distance and language but other help can also be given in terms of helping ECI's engage with new partners. The Commission have large mailing lists and could send out one or two set mails to those relevant for each ECI - inviting people to get in contact if they so wished – thus enabling ECI's to reach out to potential partners throughout Europe.

It is a major drawback that the European Citizens' Initiatives are not part of a community, nor intend to develop a sense of community in a similar way to Aavaz or Change.org, which have a strong moral purpose and philosophy behind them, branches throughout the world, but more importantly, integrated mailing lists, which they are able to use for a greater multiplier effect. Of course, not everyone agrees with all the issues/initiatives they support but at least they are able to hear about them, think about them and decide whether or not to sign according to their own convictions. ECI's cannot even use their officially collected data, or keep it beyond the 12 months, let alone share their support base with other ECI's unless they keep parallel records, safely and securely, of course. This is hardly conducive to building a community of citizens or increasing the European Union's ability to reach out on major issues affecting them. Unlike Aavaz, and other petition sites (global and local), most people have never heard about the European Citizens' Initiative let alone how it or individual ECI's work and those who actually might sign an ECI, stand in total isolation only to be destroyed at the end of all that effort.

The central part of the mission of the European Citizens' Initiative is to connect the institutions with ordinary European Citizens and to connect like-minded Europeans - therefore this must become part of the ECI exercise or it can only fail. If an ECI cannot be started by ordinary citizens without already being connected to a strong network or serious financing (ie. another lobbyist tool) then it can only fail. If at the end of an ECI, there is no place for recognising its efforts other than it being labelled obsolete (i.e. not reached the 1 million target) then it can only fail. If an ECI can only be a "yes/no" issue or an issue people already have pre-set views about, then it can only fail. The success of an ECI at the moment seems to be just about how many signatures an ECI has - a race to a million signatures, rather than the serious issues under discussion.

We wish every success to the current initiatives and those to come! May they profit from the lessons learned by the pioneer ECIs.

*Ana Gorey is Campaign Leader and Member of the Citizens' Initiative Committee of the ECI High Quality European Education for All. [www.euroedtrust.eu/](http://www.euroedtrust.eu/)*