



## SPECIFIC ISSUES REVIEW REPORT

### COVER PAGE

| PROJECT                |                               |
|------------------------|-------------------------------|
| Project number:        | 101134732                     |
| Project acronym:       | WHGD                          |
| Project name:          | Women's Health Goes Digital   |
| Call:                  | ERASMUS-2023-PCOOP-ENGO       |
| Topic:                 | ERASMUS-YOUTH-2023-PCOOP-ENGO |
| Type of action:        | AG LS I                       |
| Service:               | EACEA/A/5                     |
| Project starting date: | 01/01/2024                    |
| Project duration:      | 28 MONTHS                     |

| SPECIFIC ISSUES REVIEW                    |                      |
|---|----------------------|
| Date of meeting with consortium (if any): | Not applicable       |
| Name of project officer:                  | ████████████████████ |

## 1. BACKGROUND

### Background

*Give a short summary of the background needed to understand the context of the review.*

This report includes the findings of the project review in accordance with Article 25.1.2 for project ID 101134732, an action grant under the call/action ERASMUS-2023-PCOOP-ENGO. The review of this project was done at the same time as reviews of other projects where WYA Europe or WYA Croatia are involved:

Therefore, the technical review covers 3 projects and two organisations:

|             |           |              |                         |             |
|-------------|-----------|--------------|-------------------------|-------------|
| WYA         | 101134732 | WHGD         | ERASMUS-2023-PCOOP-ENGO | COORDINATOR |
| WYA Croatia | 101134732 | WHGD         | ERASMUS-2023-PCOOP-ENGO | PARTICIPANT |
| WYA         | 101161773 | WYAE OG 2024 | ERASMUS-2024-CSC-OG-SGA | COORDINATOR |
| WYA Croatia | 101161785 | YA 2024      | ERASMUS-2024-CSC-OG-SGA | COORDINATOR |

This report, as well as the other reports, builds on the reports of the two experts contracted to carry out the technical review:

- Prof. Marie-Geneviève PINSART, Université Libre de Bruxelles
- Prof. Emily-Meg JACKSON, London School of Economics

EACEA held three meetings 28/5, 16/7 and 27/7 with the experts during the review period which started at the end of May 2025 and ran until end August.

#### **Project ID 101134732 WHGD ENGO**

The grant agreement was signed with WYAE for the duration of 28 months with start date 01.01.2024 and end date 30.04.2026 for a total maximum grant amount of EUR 400.000.

The project summary reads: *“The project aims to develop capacities of partner organizations, skills and competences of youth workers to design and deliver innovative training programs in the field of women’s mental and reproductive health and rights, and educate girls and young women on reproductive health, reproductive rights and reproductive mental health. An innovative digital platform with reliable information and educational programs will also be developed through the project to help bridge the gap and ensure easy access and wider reach across Europe. The project is designed to meet the needs of girls and young women both on the local level and EU as a whole”.*

It also adds that: *“The project will develop an innovative and comprehensive training program and digital platform for girls and young women on reproductive health, women’s rights, and reproductive mental health. The program will contain 15 training modules covering the topics of reproductive health, informed consent, access to reproductive health care services, developing resilience in the field of reproductive mental health, reproductive rights under EU and international law, gender equality etc. On top of that, the digital platform will provide timely and reliable information about access to health care services and provision of women’s rights in different domains”.*

## 2. ISSUES AND SCOPE OF THE REVIEW

| Issues and scope of the review  |
|---|
| <p><b>Issues</b></p> <p><i>Give a short summary of the issues.</i></p> <p>Concerns/issues over the content of activities, trainings, deliverables and events organised under this specific grant in relation to</p> <ul style="list-style-type: none"> <li>- the grant agreement, including the compliance with the article 14 on ethics and values and the annexes in the grant agreement;</li> <li>- the Erasmus+ Regulation and objectives of the call;</li> <li>- the EU Financial Regulation and the EU Treaties;</li> </ul> <p>In this regard, the issues concern potential risk of disinformation targeting participants in the project's activities with biased information and, in particular, vulnerable audiences and minority groups. The report also assesses compliance in the specific fields of reproductive health, contraception, sexual transmission diseases, including EU positions about human dignity, safe sex and how to promote safe sex.</p> <p>A detailed analysis of the Work Packages and deliverables have been conducted by the experts and is available in the sections below. These include as a non-exhaustive list:</p> <p>D1. Handbook with best practices, approaches and methodologies organization in implementing programs in the field of women's mental and reproductive health and rights</p> <p>D2. Training program and methodology for informing and educating girls and young women on women's mental and reproductive health and rights</p> <p>D3. Report about Training for youth workers</p> <p>D4. Publication about the research and gathering information</p> <p>D11. Kick-off meeting report</p> <p>Additional concerns are also raised over policy papers, media and communication activities on other fields than reproductive health education in relation to EU values, EU policy priorities and established positions.</p>  |
| <p><b>Scope of the review</b></p> <p><i>Define the scope of the review. If possible, formulate specific questions.</i></p> <p>The report takes into account the overall framework in which the grant is given, as specifically described in:</p> <ol style="list-style-type: none"> <li>1) the objectives of the calls, - relating to EU values as in the EU Youth Strategy 2019-2027 and ENGO Youth call objectives: 'Encouraging and equipping young people with the necessary resources to become active citizens, agents of solidarity and positive change inspired by EU values and a European identity'.</li> <li>2) In the signed agreement, in particular to the relevance of the described activities of the ENGO Youth project and in relation to article 14 on ethics and values.</li> <li>3) The stipulations in the EU financial regulation, in particular article 6.3: In the implementation of the budget, Member States and the Commission shall ensure compliance with the Charter of Fundamental Rights of the European Union, in accordance with Article 51 of the Charter, and shall respect the Union values enshrined in Article 2 TEU relevant in the implementation of the budget' and,</li> <li>4) Art 2 of TFEU: 'The Union is founded on the values of respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights, including the rights of persons belonging to minorities. These values are common to the Member States in a society in which pluralism, non-discrimination, tolerance, justice, solidarity and equality between women and men prevail.' Please also see the EU Commission's webpage on justice and fundamental rights: <u><a href="https://www.europa.eu/charter/pdf/text_en.pdf">Justice and fundamental rights</a></u> as well as the Charter of Fundamental Rights of the European Union <u><a href="https://www.europarl.europa.eu/charter/pdf/text_en.pdf">https://www.europarl.europa.eu/charter/pdf/text_en.pdf</a></u>.</li> </ol> <p>The documentation used for the review covers several sources directly related to the grant agreement, including the proposal application and its evaluation, and all the reports and deliverables provided as well as any other relevant documentation for assessing the issues detected. This includes WYA</p> |

accessible public information, including the websites [www.wya.net](http://www.wya.net), [ssm-jie.com](http://ssm-jie.com), WYA Facebook [www.facebook.com/WYAeurope/](https://www.facebook.com/WYAeurope/) and Instagram [/www.instagram.com/wyaglobal/?hl=en](https://www.instagram.com/wyaglobal/?hl=en).

### **Guidance on the context of sexual and reproductive rights**

As regards to aspect of sexual and reproductive health and rights, the work of the experts identified a reference frame of guidance beyond the general framework of the TFEU, the EU Financial Regulation and the grant agreements themselves.

This includes the European Parliament resolution of 24 June 2021 on the situation of sexual and reproductive health and rights in the EU, in the frame of women's health (2020/2215(INI)) (2022/C 81/04)). This includes access to:

- I. scientifically accurate, evidence-based, age-appropriate, non-judgemental and comprehensive sexuality education (Article 26)
- II. universal access to a range of high-quality and accessible modern contraceptive methods and supplies (Article 30)
- III. access to safe and legal abortion, recognising that a total ban on abortion care or denial of abortion care is a form of gender-based violence (Article 35)

On the principle of non-discrimination, the Charter of Fundamental Rights of The European Union (2000/C 364/01) Article 21 states that:

- IV. "Any discrimination based on any ground such as sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation shall be prohibited."

Under European Parliament resolution of 24 June 2021 on the situation of sexual and reproductive health and rights in the EU, in the frame of women's health (2020/2215(INI)) (2022/C 81/04)), Member States must also 'combat the spread of discriminatory and unsafe misinformation on SRHR, as it endangers all persons, especially women, LGBTIQ+ persons and young people' (article 29); and 'provide evidence-based, accurate information about contraception and to establish strategies to tackle and dispel barriers, myths, stigma and misconceptions' (Article 32).

On HIV/AIDS, the European Parliament resolution of 20 May 2021 on Accelerating progress and tackling inequalities towards ending AIDS as a public health threat by 2030 (2021/2604(RSP)). This document explicitly mentions combating stigma and discrimination and supporting key populations.

The European Parliament resolution of 14 September 2021 on LGBTIQ+ rights in the EU (2021/2679(RSP)), among other things:

- 'Expressed deep concern regarding the discrimination suffered by rainbow families and their children in the EU and the fact that they are deprived of their rights on grounds of sexual orientation or gender identity, or sex characteristics of the parents or partners. The Commission and the Member States are called on to overcome this discrimination and to remove the obstacles they face when exercising the fundamental right to freedom of movement within the EU';
- 'Underlined the need to work towards the full enjoyment of fundamental rights by LGBTIQ+ persons in all EU Member States. Parliament insisted that the EU needs to take a common approach to the recognition of same-sex marriages and partnerships'

### **REGULATION (EU) 2021/817 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 May 2021 establishing Erasmus+: the Union Programme for education and training, youth and sport and repealing Regulation (EU) No 1288/2013**

Para 64 states that: 'This Regulation respects the fundamental rights and observes the principles recognised in particular by the Charter of Fundamental Rights of the European Union (the 'Charter'). In particular, this Regulation seeks to ensure full respect for the right to equality between women and men and the right to non-discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation, and to promote the application of Articles 21 and 23 of the Charter.



### 3. ASSESSMENT

| Assessment   |
|--|
| Opinion  |
| <p><b><u>Purpose of Project:</u></b></p> <p>Overall, the activities set out in the grant agreement are relevant and in line with the call. Their objectives include the development of capacities for youth workers to design and deliver training programmes in the field of women's mental and reproductive health and rights, a digital platform to provide information on women mental and reproductive health, and a methodology for informing and educating girls and young women on mental and reproductive health and rights, in particular those with fewer opportunities.</p> <p>The beneficiary committed to complying with EU values: <i>'All the activities be carried out in line with the highest ethical standards and the applicable EU, international and national law on ethical principles. Fundamental EU values, as outlined in Article 2 of the Treaty on the European Union and Article 21 of the EU Charter of Fundamental Rights (such as respect for human dignity, freedom, democracy, equality, the rule of law and human rights, including the rights of minorities) will be respected'</i>.</p> <p>It is noteworthy that the Mission Statement and the Proposal (Grant Agreement – Annex 1) advocate "to inform and educate girls and young woman on mental and reproductive health and rights" without further elaboration of the key element that the project will focus on the view that life starts at conception.</p> <p><b><u>Opinion on the outputs:</u></b></p> <p>The following deviations from Article 14 of the Grant Agreement with regards to EU values and ethical standards have been identified in the implementation of some of these activities:</p> <ol style="list-style-type: none"> <li><b>One-sided and biased material on sexual and reproductive health rights.</b></li> </ol> <p>The materials put a strong focus on abstinence and natural family planning and systematically omit certain topics or present them in a negative way (for example, in relation to comprehensive sex education, oral contraception, abortion and surrogacy).</p> <p>The presentation of this topics lacks balance and does not reflect the expectation of scientifically accurate, evidence-based, non-judgmental and comprehensive sexuality education. By omitting or downplaying certain aspects (e.g., abortion, contraception), and excluding certain groups such as LGBTIQ+ people and single woman, the material risk creating partial or misleading impressions.</p> <ol style="list-style-type: none"> <li><b>Policy papers and positions presenting one-sided views that deviate from the call objectives</b></li> </ol> <p>The DoA states that <i>'All WYAE activities are open to all its members from all the countries, which gives them a strong intercultural character, and strengthens the EU values.'</i> In fact, it is only possible to be a member of WYAE if you sign up to the WYA Charter.</p> <p>Among other things, the Charter states <i>'that the intrinsic dignity possessed by every human being from conception to natural death is the foundation of everyone's right to life' and 'that the fundamental unit of human society is the family'.</i></p> <p>The restricting membership to those who share a specific belief may limit inclusivity and discourage or exclude participation from young people with diverse perspectives. This contrasts with Erasmus+ objectives of openness, intercultural exchange, and pluralism.</p> <p>According to its website: <i>'A flawed vision of the human person threatens human dignity on a global scale. This is evident in policies that promote abortion, tie foreign aid to population control policies, and prioritize ideology over more effective prevention strategies in addressing HIV/AIDS.'</i></p> <p>This contrasts again with Erasmus+ objectives of openness, intercultural exchange, and pluralism.</p> <p>The WYA White Papers <a href="https://wya.net/white-papers/">https://wya.net/white-papers/</a> contain statements which are one-sided and at odds with established EU positions. For example:</p> <ul style="list-style-type: none"> <li>➤ On Gender, it rejects the claim that gender can contradict biological sex. The EU LGBTIQ+ Equality Strategy 2020-2025 and 2026-2030 separates and protects both sex and gender.</li> <li>➤ On HIV/AIDs, it downplays the effectiveness of condom use, argues against the</li> </ul> |

UNAIDS/WHO approach to prevention in favour of behavioural change ('stopping risky behaviors' and 'cultivating a culture of personal responsibility'). There is a potential risk to young people's health as a result of the lack of explanation about the protection condoms provide against HIV transmission. The EU Commission and the European Centre for Disease Prevention and Control include condoms as a key component of HIV prevention.

- On sex education, claims that there is no right to comprehensive sex education. While the EU consistently endorse comprehensive sexuality education (ie. Roadmap for woman's Rights – Commission Communication, March 2025; European parliament Resolution on the situation of sexual and reproductive health and right in the EU in the frame of women's health – June 2021). EU LGBTIQ+ Strategy states that inclusive sexual education should address LGBTIQ+ issues to combat prejudice.

According to Article II.1.1 of the Erasmus+ grant agreement, funded activities must uphold ethical principles, promote scientific accuracy, and align with core EU values, including human dignity, inclusion, diversity, equality, and respect for fundamental rights.

Those statements restrict scientific accuracy and information and do not foster inclusion and diversity as described in the Erasmus+ Inclusion and Diversity Strategy. In fact, they constitute discriminations linked to gender identity and gender expression.

### **Expected impacts achieved**

At this stage of implementation of the project (mid-term), there has been progress in carrying out some of the impacts described in the Description of the Action. However, certain issues have been identified:

- The participation of young people is quantified, but this information remains very general. We have little information on the selection process, the profile of these young people, or their contribution to the development of the activities.
- The project aims to include vulnerable young people from migrant backgrounds.
- The digital platform is yet to be developed.
- The aim to reach 100,000 girls and young women is yet distant considering the estimates of 3000 readers from the Blogs, and 5000 via the newsletter.

### **Progress of work (DoA)**

The tasks and activities planned for the work packages foreseen for the first reporting period (M1-M14) have overall been completed with some deviations:

- Work package 1 - project management and coordination (M1-M28): Largely completed. There are six online coordination meetings which have not yet taken place. The mid-term report has been completed and submitted in due time to the Agency.
- Work package 2 - Developing capacities of partner organisations to design and deliver innovative training programs in the field of Women's Mental and Reproductive Health and Rights (M4-M13): this work packages was completed and included: meeting for the exchange of best practices, approaches and methodologies of partner organization in implementing programs in the field of women's mental and reproductive health and rights (location Pamplona, Spain), developing innovative training program and methodology for informing and educating girls young women on women's mental and reproductive health and rights, training for youth workers from partner organization (location Zagreb, Croatia), implementation of the program locally in partner countries with 20 girls and young women per country, mobility of youth workers where trainers fine-tuned the program and developed step-by-step activity plans for its implementation (location Warsaw, Poland).
- Work package 5 - Visibility and dissemination (M1-M28): this work package has completed the tasks planned for the period, in particular: promotional materials have been prepared, 4 press releases have been produced (out of nine), 6 blogs have been written (out of 14), 5 newsletters have been prepared and distributed (out of 14).

For the two other work packages planned for the 2<sup>nd</sup> reporting period, work is in progress, namely the development of MOOC platform and the activities linked to policy recommendations and raising awareness.

The 4 deliverables due for the first reporting period have been submitted within the deadlines. None of them have been approved in the system. A detailed assessment of the deliverables by the experts is

available below.

| Deliverable number | Deliverable name  | Comments  |
|--------------------|---|---|
| D1                 | <i>Handbook with best practices, approaches and methodologies organisation in implementing programs in the field of women's mental and reproductive health and rights</i> | <p>A 23-page Handbook has been delivered. It presents a summary of eight of the ten presentations and lectures given at the meeting held in Pamplona (Spain) in May 2024.</p> <p>While there was, as the Handbook states in its conclusion, diversity in the areas covered (education, behaviour, medical practices, etc.), there was no diversity of opinion expressed: all support the same position against contraception and the medicalised approach to health, and in favour of sexual abstinence.</p> <p>Intellectual rigour would require a critical presentation of all scientifically or philosophically based points of view on a given issue.</p> <p>The following programs contain biased and one-sided material on sexual and reproductive health:</p> <p>1.The 'Teen STAR' program states that it:</p> <ul style="list-style-type: none"> <li>• Focuses on preventing teen pregnancy and STDs through the promotion of abstinent behavior</li> <li>• Supports virginity and a return to chastity</li> <li>• Helps young women understand themselves and young men gain self-mastery</li> </ul> <p>Instructors on the program 'Must believe in the program's values to ensure authenticity'</p> <p>In the section 'Alternatives for Oral Contraceptives in Women's Health: Research by Dr. Miguel Angel Martinez', the key points covered include:</p> <p>Life Begins at Fertilization:</p> <ul style="list-style-type: none"> <li>○Emphasized that life begins at fertilization, highlighting the unique and extraordinary nature of conception.</li> </ul> <p>Natural Family Planning (NFP):</p> <ul style="list-style-type: none"> <li>○ Advocated for NFP as an effective method for conscious procreation, aligning sexual activity with the fertile phase of the cycle.</li> </ul> <p>One 'positive' outcome of the programme is reported as</p> <ul style="list-style-type: none"> <li>• Decisions to discontinue</li> </ul> |

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|    |  | contraceptive use or alter relationship dynamics based on newfound knowledge.  |
| D2 | <i>Training program and methodology for informing and educating girls and young women on women's mental and reproductive health and rights</i> | <p>The Beneficiaries have delivered a 465-page Training program and methodology. The document is translated in seven languages. The project will develop an innovative and comprehensive training program and digital platform for girls and young women on reproductive health, women's rights, and reproductive mental health.</p> <p>The program will contain 15 training modules covering a variety of topics related to reproductive health. The lessons are well structured (each one includes an outline of the topics covered, a conclusion and questions for discussion). Compared to D1, this document is more balanced in its presentation of different points of view. Discussions debating the pros and cons are provided (p. 29). but there are exceptions.</p> <p>For example:</p> <ul style="list-style-type: none"> <li>• The training program places emphasis upon 'alternatives to artificial contraceptive methods' and promotes 'natural family planning'.</li> <li>• In relation to contraceptive methods, the training program requires trainers to 'Emphasize that while contraceptives are effective at preventing pregnancy, they do not address the underlying issues of sexual behavior and responsibility'</li> <li>• It tells trainers to 'Discuss alternatives to contraceptives from a conservative perspective, such as abstinence, natural family planning (NFP), and adoption'</li> <li>• Trainers should also 'Highlight the benefits of abstinence, including emotional and physical health, and the importance of building strong relationships based on respect and communication.'</li> <li>• The word 'abortion' appears only once in the section on the Legal Framework for the Right to Health in the EU (p. 19). No lessons are devoted to it.</li> <li>• The term "gender" refers to a very narrow conception: it refers only to one of two poles, either 'women' or 'men'. Nothing is said about LGBTQ+ people. Similarly, the reproductive rights of single women are not mentioned.</li> </ul> |
| D3 | <i>Report about Training for youth workers</i>   | <p>This is an eight-page report of a three day 'partner training' event that took place in Warsaw in January 2025.</p> <p>Various topics were discussed, including the health of Ukrainian refugee women, perinatal care and the theme of 'pain and recognising irregularities in the female body'.</p>  |



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|  |  | <p>It is regrettable that the issues of rape, contraception and abortion were not addressed.</p> <p>The fact that a training event on women's reproductive health does not mention contraception or abortion at all risks creating misinformation by omission.</p> <p>The statement that one expert 'highlighted the benefits of using cycle tracking apps, starting for teenage girls'. There was no mention of scientific questions surrounding their effectiveness, or other options for teenage girls.</p> |
| <b>Recommendations</b>   |  |  |
| <ul style="list-style-type: none"> <li>➤ The participation of young people is quantified, but this information remains very general. We have little information on the selection process, the profile of these young people, or their contribution to the development of the activities.</li> <li>➤ While it may be legitimate for the project promoters to defend a particular conception of health and reproductive rights, this point of view should have been made clear from the outset, in the proposal/application, and in the implementation of the project and its deliverables.</li> <li>➤ But more important still, and in line with the objectives of the call and article 14 on ethics and values of the Grant Agreement, it's necessary to introduce a comprehensive approach in the aspect of sexual and reproductive health and rights that includes scientifically accurate, evidence-based, non-judgmental and comprehensive sexuality education.</li> <li>➤ These principles are at risk in the approach and methodology adopted in the development of the handbook and the training program by putting emphasis, for example, in chastity and abstinence, while also casting doubt on the safety of modern contraceptive methods, despite the overwhelming weight of evidence that hormonal contraception is safe and effective.</li> <li>➤ A one-sided and biased view poses a problem in terms of intellectual rigor and honesty. The activities should include comprehensive sexual education and the omission of certain topics (ie. abortion) and certain people (ie. single women, LGBTIQ+) are at odds with some of the call objectives in terms of inclusion, diversity and representation.</li> <li>➤ Ensure that the material and deliverables provided comply with EU values, the Charter of Fundamental Rights of the European Union articles 3 and 21, and the rights of LGBTIQ+ individuals and families are present.</li> </ul> |  |  |

Summary issues of compliance

| Actions   | Issues of compliance  | Relevant EU Framework  |
|---|---|--|
| One-sided and biased material on sexual and reproductive health rights.   | The presentation lacks balance and does not reflect an evidence-based, comprehensive, and non-judgmental sexuality education. By omitting or presenting negatively certain aspects (e.g., abortion, contraception) or categories of people (LGBTIQ+ or single women) and emphasising abstinence or natural family planning, the material risk creating partial or misleading impressions. | EU Values (Art. 2 TEU);<br><br>Charter of Fundamental Rights (Arts.3, 21, 35);<br><br>Erasmus+ Regulation (EU 2021/817, para 64);<br><br>Erasmus+ Grant Agreement Art. II.1.1. and art. 14 |
| White Papers containing positions which are one-sided and at odds with established EU positions regarding Inclusion and Diversity, Comprehensive sexuality education, and disease prevention. | Dismissing widely accepted scientific evidence and public health guidance poses a problem. Statements on gender identity, sexuality education and HIV prevention risks reinforcing stigma and discriminate people.  | EU Values (Art. 2 TEU);<br><br>Charter of Fundamental Rights (Arts.3, 21, 35);<br><br>Erasmus+ Regulation (EU 2021/817, para 64);<br><br>Erasmus+ Grant Agreement Art. II.1.1. and art 14. |
| Lack of information on how young people are selected and contribute to the design of deliverables.  | Diversity is important to provide input for the organisation of activities to meet the Erasmus+ objectives on active participation, co-creation, and democratic engagement. Activities seem to reflect mainly the organisation's position and provide little evidence of youth-led input.   | Erasmus+ Regulation (EU 2021/817, para 64);<br><br>Erasmus+ Grant Agreement Art. II.1.1.   |
| Omission at application stage of key aspects to assess activities on sexual health education  | The organisation mentions human dignity and sexual health education without describing its positions such as its opposition to abortion and comprehensive sex education, their emphasis on abstinence and natural family planning, and the fundamental idea that life begins at conception.   | Erasmus+ Grant Agreement Art. II.1.1. and art 14.  |
| Membership only open to those signing WYA Charter   | Restricting membership to those who share a specific belief (ie. life starts at conception) may limit inclusivity and discourage participation from young people with diverse perspectives. This contrasts with Erasmus+ objectives of openness, intercultural  | Erasmus+ Regulation (para 64).   |

| Actions | Issues of compliance     | Relevant EU Framework |
|---------|--------------------------|-----------------------|
|         | exchange, and pluralism. |                       |