

# The accreditation of UNESCO Clubs in France: procedural opacity and lack of legitimacy

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## Abstract

The accreditation process for UNESCO Clubs in France, conducted by the French National Commission for UNESCO (CNFU), suffers from a lack of transparency and legitimacy. The absence of explicit evaluation criteria, the opacity of the accreditation committee's composition and the existence of fees that amount to "monetising" the label call into question the scientific, legal and institutional validity of the system. Based on three theoretical approaches – criteria-based evaluation (Stufflebeam), constitutional law on associations (Grosso's analysis), and organisational legitimacy theory (Suchman) – this article demonstrates the lack of structural legitimacy of the process and proposes avenues for change.

**Keywords:** UNESCO; accreditation; criteria-based evaluation; freedom of association; institutional legitimacy; governance

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Created to promote the ideals of peace, cooperation and sustainable development championed by UNESCO, associations wishing to benefit from the Club for UNESCO label must obtain accreditation issued in France by the CNFU. This accreditation determines the use of the UNESCO name and logo and, for some, is a highly symbolic issue.

Analysis of the accreditation procedures reveals a process marked by opacity; undefined accreditation criteria; a committee whose composition is highly opaque in terms of the choice of individuals identified and their assessment skills; and the existence of fees required to obtain the label. This situation raises questions about the validity of the assessment and the legitimacy of the accreditation process.

The problem is twofold: on the one hand, the evaluation methodology is flawed, as the lack of clear criteria makes it impossible for candidate associations to prepare their applications adequately and introduces significant disparities between them; on the other hand, the governance of the accreditation itself appears fragile due to the lack of clarity regarding the powers of the committee members and the lack of representation of UNESCO clubs, which legitimately falls to the national federation of clubs<sup>(1)</sup> – which was abolished, without justification, by the CNFU. The accreditation committee's assessment powers are not established, and its operating rules are illegitimate. Furthermore, the question of the fees charged raises concerns, as it tends to equate obtaining the label with a financial transaction, blurring the line between accreditation based on objective qualitative criteria and a profit-making approach.

These grey areas are not just a practical issue of managing applications, they raise broader scientific, legal and institutional issues. Scientifically, it

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<sup>1</sup> ACUF: Association des Clubs Unesco de France (Association of UNESCO Clubs in France)

The question is whether accreditation meets the standards of criteria-based assessment, which requires the prior and public definition of analytical benchmarks. Legally, it is necessary to examine whether the committee's functioning is compatible with freedom of association, which is guaranteed by the French Constitution and by international instruments relating to fundamental rights. Finally, institutionally, it is necessary to question the legitimacy of the accreditation committee, which makes decisions according to its own principles and with self-attributed authority.

### **A non-criterion-based assessment: a discretionary process**

Evaluation is defined, in its most traditional sense, as "the judgement of the value or merit of an object according to explicit and justified criteria" (Scriven, 1991). This fundamental principle is absent from the French accreditation process. There is no public reference framework enabling candidate associations to know on what criteria their project will be assessed. The absence of an analysis grid, weighting system and structured feedback to candidates transforms what should be an evaluation into a discretionary selection process.

This observation is not anecdotal: it touches on the very heart of what distinguishes an objective, criteria-based assessment from a simple subjective decision. An evaluation is based on the prior establishment of criteria that are recognised as relevant, shared by all stakeholders, and applied systematically and fairly. Otherwise, the process loses its rational dimension and becomes an act of power, guided by implicit preferences or unexpressed considerations.

From a more systemic perspective, Stufflebeam's **CIPP** model (1971) highlights four essential components of evaluation: context, resources mobilised, process followed and results obtained. Applied to the accreditation of UNESCO Clubs, this model reveals the extent of the shortcomings: the context remains unclear, the resources required of associations are not precisely defined, the review process is opaque and the results are not justified (no evaluation report is provided to candidates). Thus, the label is not the product of a rigorous evaluation, but the result of an arbitration process whose rules remain opaque.

Each of these shortcomings has serious implications. The vagueness of the context makes it impossible to identify precisely what is expected of clubs: cultural diversity, human rights education, local action, international cooperation? Nothing is specified. The lack of a clear definition of the resources expected deprives associations of benchmarks for structuring their applications: financial capacity, territorial presence, educational expertise, UN skills, etc.? The CNFU's silence on this point leaves room for uncertainty. The review process itself is not open to outside scrutiny: who sits on the committee, on what basis of competence, and according to what deliberation procedures? Finally, the result is notified without explanation, justification or constructive feedback, preventing candidates from learning from the experience and strengthening their practices, or even simply participating in a contradictory debate.

In scientific terms, this situation is equivalent to what Stufflebeam called a "facade evaluation": a system that presents itself as an evaluation but which, in reality, is not based on any explicit criteria or systematic methodology. For associations, the consequences are significant: they invest time, resources and sometimes money without knowing on what basis they will be judged. For UNESCO, the risk is that the meaning of its label will be diluted: if accreditation is not perceived as the result of an objective evaluation, it becomes an arbitrary sign, awarded or refused without consistency, and therefore devoid of reference value. This aspect is paradoxical when viewed in the light of the requirements of UNESCO's 2017 regulatory framework, which the CNFU nevertheless uses to monitor clubs.

### **Legally and democratically fragile governance**

Beyond methodological flaws, the procedure raises serious legal questions. Under French law, freedom of association, enshrined in the 1901 law and protected by the constitution, means that the creation and operation of an association does not require prior administrative authorisation. By making the use of the label conditional on accreditation whose rules are unclear, and by arbitrarily removing the national federation of clubs that ensured their collective representation, the CNFU is exercising a power that exceeds its legitimately recognised remit.

collective representation, the CNFU is exercising a power that exceeds its legitimately recognised remit. The regulatory framework adopted by UNESCO in 2017 specifies that National Commissions have the authority to control the use of the Organisation's name, acronym and logo, but under no circumstances may they regulate the internal affairs of associations. Enrico Grosso, in his *Parere pro veritate* report on the Italian Federation of UNESCO Clubs, emphasises that clubs must be considered as autonomous private law associations, protected by freedom of association, and not as administrative dependencies of national commissions. The current system of accreditation, monitoring and support for clubs runs counter to these principles by subjecting associations to unlimited and unregulated control by the CNFU, which is ultimately illegitimate.

The composition of the French accreditation committee is itself a source of controversy. Members are not appointed in a transparent manner, their assessment skills are not established and their scientific legitimacy is not demonstrated [they are appointed solely on the basis of institutional representativeness, particularly ministerial representativeness]. The lack of representation of the clubs themselves breaks with the spirit of association and deprives candidates of a voice in the process. This lack of representativeness and transparency weakens governance in two ways: legally, by contravening freedom of association; democratically, by confiscating the voice of associations – and therefore of civil society – in favour of a self-appointed body.

## Non-existent institutional legitimacy

The theory of organisational legitimacy developed by Suchman (1995) distinguishes three dimensions : pragmatic legitimacy (based on the interests of stakeholders), normative legitimacy (based on fairness and transparency) and cognitive legitimacy (based on social understanding). The French process fails on all three counts.

On a pragmatic level, the concrete benefits of accreditation are not clearly defined. Associations know that they obtain the right to use the UNESCO name and logo—under supervision—, but beyond this symbol, the real benefits – institutional support, recognition by public authorities, access to networks – remain vague and uncontractualised. The existence of accreditation fees accentuates this opacity: how can one financially justify a label whose added value has not been demonstrated?

From a normative perspective, the opacity of criteria, the lack of justification for decisions and the abolition of the representative federation undermine the perception of fairness. In an associative framework, institutional normativity requires clear rules, equal treatment of applications, and the possibility of effective representation. By depriving clubs of their federative body, the CNFU has broken this principle, transforming accreditation into a vertical process.

Finally, from a cognitive perspective, the system is opaque: the rules of the game are unknown, decisions are not justified, and no structured feedback is provided to applicants. This lack of transparency prevents the associations concerned from taking ownership of the process and undermines the legitimacy of the label in the eyes of civil society.

Thus, by failing to establish pragmatic, normative and cognitive legitimacy, French accreditation deprives itself of any solid institutional foundation. This triple failure is not only a technical weakness, but a structural problem: it places the process at odds with the governance standards that UNESCO itself promotes in its recommendations.

## Towards an evolution of accreditation

In light of these findings, changes appear necessary if the credibility of the UNESCO label is to be restored. These changes can be identified in three areas:

- **Methodological:** publication of clear evaluation criteria, based on objective, qualitative and shared criteria, guaranteeing equal treatment.
- **Institutional:** reinstatement of democratic representation of clubs through an independent federation, and transparency regarding the composition and powers of the committee.

- **Ethical:** abolition or strict regulation of accreditation fees, so that access to the label is based exclusively on objective qualities.

These changes are not incidental. They determine the legitimacy of the process and, consequently, the credibility of the UNESCO label. Otherwise, accreditation will remain an opaque, discretionary system that runs counter to the ideals of democracy, transparency and equality that UNESCO seeks to embody.

## Conclusion

Analysis of the accreditation process for UNESCO Clubs in France highlights a profound lack of transparency, legitimacy and credibility. Far from being a mere administrative problem, this dysfunction reveals a major political and institutional issue: the place given to civil society in the governance of UNESCO.

Historically, UNESCO Clubs were conceived as citizen relays for the UN ideals of peace, cooperation and sustainable development. Through their diversity and local roots, they constitute a unique mobilising force, capable of bringing the Organisation's values to life on the ground. The opacity of the accreditation process and the abolition of national representative bodies reflect the sidelining of civil society, which has been reduced to the role of a mere beneficiary of a label rather than a full-fledged actor in UNESCO's mission.

The situation in France thus illustrates a paradox: at a time when UNESCO is affirming the need for inclusive and participatory governance<sup>2</sup>, the mechanisms put in place to regulate its associative relays are moving away from this ideal. Restoring the legitimacy of accreditation therefore requires not only methodological and institutional reforms, but also a redefinition of the place of civil society in the UN architecture.

It is through the recognition of the genuine capacity of clubs to represent and participate that the CNFU, and more broadly UNESCO, will be able to guarantee a credible, fair and meaningful process. Accreditation should not be an opaque filter, but a mechanism for promoting and supporting citizen initiatives.

In other words, the reform of association accreditation is a strategic issue: it determines UNESCO's ability to remain faithful to its primary vocation, that of embodying an organisation where peoples find their voice alongside States in the construction of an international order based on peace and cooperation.

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<sup>2</sup> With my slogan 'UNESCO for the People,' I want to break down barriers, give a voice to the marginalised and bring about concrete change..." Khalid El-Enany (Candidate for UNESCO Director-General) – *UNESCO for the People: Khaled El-Enany unveils his campaign slogan for the position of UNESCO Director-General*, BusinessWire, 16 January 2025

I propose to overhaul UNESCO's governance by strengthening transparency and the impact of investments..." Edouard Firmin Matoko (Candidate for UNESCO Director-General) - summary of his candidacy project in the "Project" article on Wikipedia (section "Structuring Project")

