



Commissioner László Andor
Directorate General Employment, Social Affairs and Inclusion
B-1049 Brussels

Cc: Lieve Fransen
Cc: Emma Toledano Laredo
Cc: Gabriella Kovacs
Cc: Elodie Fazi

Brussels, 1st February 2013

Dear Commissioner Andor,

As an ad hoc Group of social NGOs, Public Authorities and rights organisations, committed to the fight against child poverty, and to promoting child well-being¹, we are looking forward to the forthcoming adoption of the European Commission's Recommendation on Child Poverty and Well-Being as part of the Social Investment Package.

We believe that the Commission has a key role in promoting and encouraging the effective engagement of all levels of government and all stakeholders in raising awareness, monitoring and supporting the implementation of the Recommendation in the Member States. We would therefore like to take this opportunity to present our common proposals to support the Recommendation's implementation at EU, national and local levels.

Thank you in advance for the consideration of our proposals. Please do not hesitate to contact us to discuss these proposals further.

We look forward to hearing from you

Sincerely,

¹ The Ad hoc group includes: ATD 4th World, Caritas, Coface, EAPN, European Social Network, Eurochild, Eurodiaconia and PICUM



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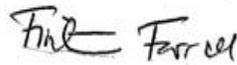
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Ad hoc Group on Child Poverty and Well-being

Common Proposals for Implementing the Recommendation on Child Poverty and Well-being through a partnership approach

Introduction

The Commission's proposal for a Recommendation to tackle child poverty and promote well-being is planned to be adopted in February 2013. This paper aims to complement the implementation process planned by the Commission in its Staff Working Paper, offering further ideas to help make the proposals a reality at national level.

Presentation

- We are an **ad hoc group of social NGOs, public authorities and rights organisations**, committed to the fight against child poverty, and to promoting child well-being².
- We strongly **support the Commission's upcoming Recommendation** on Tackling Child Poverty and promoting Well-being, and value the consensus built up over the last 5 years on its principles involving the Commission, Council and stakeholders, developed through the framework of the Social OMC and Europe 2020.
- We are **committed to a multi-governance, multi-stakeholder** model of policy development and delivery, based on a partnership approach, and believe that effective implementation depends on the active engagement of all stakeholders³.
- We **recognize the risk that the Recommendation will remain a paper exercise** and wish to contribute actively to its practical implementation.
- This paper sets out the rationale for our engagement and makes concrete proposals for action to support implementation of the Recommendation at EU, national and local level. We believe that the **Commission has a key role to play in promoting** and encouraging the effective engagement of all levels of government and all stakeholders in this process.

Rationale

- Notwithstanding the limitations of the Recommendation as a non-binding instrument, the implementation of the 2008 Recommendation on Active Inclusion was also weakened because of the low level of support for participation of stakeholders at national and sub-national levels (be it in adapting existing policies or introducing new policies). Therefore, we believe that the 2013 Recommendation on Child Poverty and promoting Child Well-Being can be more successful if the EU supports the active participation of stakeholders at all levels in order to contribute to bringing existing national policy in line with the Recommendation or introducing new policies where appropriate.
- If Member States endorse the deepening of EU political and economic integration as a response to the problems they are now facing, it is inevitable that deeper integration will include a social dimension. The EU needs to be able to point to **an area of social policy in which it has experienced some success**, and to a working example which could be effectively applied in other social policy areas.
- In the light of **growing public unease** with the impact of austerity policies, which are undermining support for the EU, the EU needs to **increase its credibility** in the area of social policy and poverty reduction. Child poverty and social exclusion have been identified as a major priority by Member States and by many other EU bodies and institutions. Given the consensus that exists around the challenge of growing levels of child poverty and social exclusion, this would be a very appropriate policy area for the Commission to throw its weight and financial support.

² The Ad hoc group includes: ATD 4th World, Caritas, Coface, EAPN, European Social Network, Eurochild, Eurodiaconia and PICUM

³ For the purposes of this paper the term 'stakeholders' refers to: public authorities, social partners, civil society organisations, service providers and children and families with direct experience of poverty and social exclusion

- If the Commission were to **support and help to fund a meaningful role for stakeholders** in raising awareness, monitoring and supporting the proper implementation of the Child Poverty Recommendation, it would demonstrate its commitment to a **true “partnership approach”**⁴.

Key Messages

1. **Ensure strong EU leadership to drive implementation based on active partnership**
2. **Mainstream the Recommendation through the Europe 2020 Strategy**
3. **Put in place an EU Roadmap for the implementation of the Recommendation that includes an EU multi-annual work programme**
4. **Facilitate and support national and sub-national stakeholders’ involvement in the implementation of the Recommendation**
5. **Use EU funds to support delivery**

Key Messages with Detailed Proposals

1. Ensure Strong EU leadership to drive implementation based on active partnership.

- Commitment should be sought from the **European Council** and from the **Presidencies Trio** to ensure a visible adoption and follow-up of the Recommendation.
- Public/high-profile **championing by the Commissioner for Employment & Social Affairs** to ensure that implementation/monitoring and outcomes are kept on the political agenda, including investing in sufficient staff resources.
- **Engagement of the Secretariat General** to ensure inclusion of the child poverty/well-being priority in the monitoring framework of Europe 2020 and in the country-specific Recommendations.
- **Building a partnership to drive implementation:** both horizontally between different DGs, and vertically;- promoting cross-governmental departments’ links at national, regional and local levels, and championing regular, meaningful dialogue with key national, regional and local stakeholders, ensuring that they are supported to be key actors/partners in the implementation process.

2. Mainstream the Recommendation through the Europe 2020 strategy

- The principles agreed in the Commission’s Recommendation on Child Poverty and Well-being must be **reflected in the implementation of the EU2020 strategy** and mainstreamed into the Europe 2020 governance cycle for 2013 i.e. as an explicit priority in the Annual Growth Survey, in the guidelines and guidance notes for the NRPs and NSRs, within the bilateral meetings, and in the country-specific Recommendations.
- **A clearer template should be given for the NRPs**, requiring explicit information on how the poverty target will be reached, and the contribution played by specific measures to achieving the Europe 2020 headline target, with a specific section on child poverty.
- **The NSRs should be developed as a means of reporting on national strategies** to promote social inclusion and social protection and should include a **distinct section on combating child poverty** and promoting child well-being. The NSRs should underpin the social dimension of Europe 2020 and the NRPs. Greater attention must be given to

⁴ The importance of such a partnership approach is set out clearly in the Communication on “Partnership Principles” recently produced by the Commission, as well as in Recital 16 of the Integrated Guidelines of Europe 2020, the EPAP and in the OMC Common Objectives. The greater involvement of civil society and multi-level governance would also serve to increase the EU’s “political legitimacy” at a time when the Union is seeking to deepen and strengthen its competences across a number of sensitive policy areas (i.e. fiscal policy etc).

developing synergies between poverty and social exclusion targets and other Europe 2020 targets and to mainstreaming children's rights and well-being goals across all policy areas.

- **Specific sub-targets** for reducing child poverty and social exclusion should be made an integral part of the Europe 2020 process, as part of the agreed national poverty and exclusion target, derived from the EU headline target on poverty and social exclusion.
- **The EC must ensure that Member States implement the Active Inclusion strategy**, as advised in the AGS 2013, but ensure coherence with the Recommendation on Child Poverty and Well-being to ensure adequate integrated support to families and children.
- **More and better indicators** measuring child poverty and well-being should be included in the Joint Assessment Frame and Social Protection Performance Monitor which form the basis of the Trends to Watch of the SPC Annual report and the Country-Specific Recommendations.
- **The Commission should implement the commitment already made within the EPAPSE⁵ to develop a set of guidelines** for the engagement of stakeholders in Europe 2020, specifying the importance of organisations working directly on child poverty and social exclusion. These should be developed jointly with the SPC and involve stakeholder consultation. The implementation should be monitored by Member States through a specific section of the NRP and NSR. A requirement that stakeholder inputs should be annexed to the NRP and NSR, following the French NRP example in 2012, would be beneficial.
- **Country-specific Recommendations** should require Member States to carry out ex-ante and ex-post social impact assessment of austerity measures, to ensure that such measures do not increase child poverty and social exclusion, as well as pro-active policies to promote child well-being. A dedicated DG Employment Team should be included in the Troika programme negotiations to advise on this outcome.
- **The implementation of the Child Poverty and Well-being Recommendation** should be a core priority of the **Social Investment Package** as part of a commitment to investing in integrated strategies to fight poverty and social exclusion, based on prevention and universal services as well as alleviation.

3. Put in place an EU Roadmap for the implementation of the Recommendation including an EU multi-annual work programme

- **An EU Roadmap should be put into place for the implementation of the Recommendation** i.e. a visible, communicable plan which establishes specific objectives, key milestones with timeline and concrete allocation of resources, highlighting the role of different actors and government levels.
- **It will be crucial to ensure the continuation of the SPC Ad hoc group** to monitor implementation, and to follow up on the child poverty and well-being priority as a key Trend to Watch. The group should involve representatives beyond the 1st pillar and ensure links with Ministries for Education, Health, Child protection/welfare, and should look beyond Europe 2020 processes, linked to the National Social Report (NSR). The aim should also be to enable more systematic engagement of multi-level governance and stakeholders, including civil society organisations, the Commission and the network of independent experts, to make this group a 'partnership hub for implementation'.
- This Ad hoc group should work with the Commission to establish a **multi-annual work programme** which would comprise:
 - ✓ Establishing **specific national contact or focus points**, as has been done with the Roma Inclusion Strategy, in MS government departments who would be responsible for coordinating dialogue and cooperation between local authorities, public institutions and civil society to effectively raise awareness, implement and monitor the Recommendation.
 - ✓ Encouraging **engagement of relevant stakeholders in national monitoring frameworks**, as part of National Social Report/NRP and National Platforms against Poverty.
 - ✓ **Yearly monitoring through the NRP/NSR**, with a specific more detailed reporting on progress on child poverty and well-being every 3 years, on the basis of an agreed portfolio of indicators.

⁵ EC Communication (COM/2010/078): European platform against poverty and social exclusion.

- ✓ **Support to independent monitoring mechanisms:** through the independent experts, but also proposing independent mechanisms at national level e.g. a panel of independent experts/Ombudsman for children.
- ✓ **A specific detailed study** on a limited number of Member States, researching the gaps and challenges in implementation to feed into the review.
- ✓ **Peer reviews** on key aspects of good practices, but also on key obstacles – both internal to SPC and as part of the broader OMC. More opportunity should be provided for stakeholders to propose peer reviews e.g. child protection, migrant children, early child care, participation, etc.
- ✓ **Organization of broader thematic reviews** at least one a year, which pick up on the main learning from peer reviews, engaging a wider audience.
- ✓ **Investment in research and analysis**, strengthening analytical capacity and ensuring good linking with other DGs, investing in new areas e.g. strengthening family support, participation in decision-making, social determinants of health, social return on investment in preventative approaches, within Horizon 2020 and European Research area.
- ✓ **A bi-annual conference** involving stakeholders to highlight progress and challenges to the Roadmap, building on the Peer Reviews, National and independent reports.
- ✓ **Continued support to the Indicators Sub Group (ISG)** in the development of better indicators on child poverty and well-being, exploiting the UNCRC reporting process to increase the focus on dimensions of child well-being which have not been so well represented in existing data sets, and **ensuring a better connection** with the measurement of progress beyond GDP.
- ✓ **More emphasis given to developing a more participative methodology in indicator design** which involves children and poor families in debates about the key factors to be measured, in testing indicator proposals, to ensure key concerns are better captured.
- ✓ **Investment in participation** by agreeing guidelines on participation of stakeholders that promote the direct participation of children and their families in decision-making, particularly those facing poverty and social exclusion. This should become a key focus for research, projects and mutual learning peer reviews.

4. Facilitate and support national and sub-national stakeholders' involvement in the implementation of the Recommendation, with EU support.

- **National stakeholders have a key role to play in implementation.** It's vital to support partnership approaches at local, regional and national level which can engage civil society as well as local authorities, social partners etc. Three priority roles for such partnerships include awareness-raising, monitoring, and direct delivery of effective and innovative approaches.
- **Raising public awareness at national level** is crucial to build knowledge and pressure for implementation, as well as to bring on board new actors that can contribute to implementation. An obvious initial focus would be on the 3 pillar approach, the realities of child poverty, the benefits of investment in child well-being, and good and bad practices. NGOs working to promote the direct participation of children and families in poverty have a key role to play in this regard.
- **Stakeholders have a key role to play in monitoring implementation**, but also in identifying obstacles, new developments and solutions. This needs to start at the national level, with regular dialogue forums involving all key stakeholders, feeding into the NRP and NSR process, and more focused thematic reporting on child poverty and well-being. These forums could also become a more pro-active basis for further action, linked to research and awareness-raising actions.
- **Direct delivery of effective and socially innovative solutions:** Local Authorities, NGOs and others are already actively involved in developing and testing innovative policy solutions through project/programme delivery. Specific encouragement should be given to local community-based partnerships for social innovation in child poverty and well-being.

5. Use EU funds to support delivery

- EU funding has a **key role to play in supporting the implementation of the Recommendation**. The Commission can take a pro-active role in clarifying and providing information on the role of the different funds, and ensuring a specific focus on funding for child poverty and well-being, particularly through partnership approaches, involving Local Authorities and NGOs at the local level. A handbook highlighting the main funding opportunities would be a useful asset.
- Particular focus should also be given to **vulnerable groups** of children and their families e.g.: children in an irregular migration situation⁶, Roma and traveller children, and children in institutional care.
- The EC must **monitor Member States' use of EU funds** to ensure that the relevant funding is being used effectively to reduce child poverty and improve the well-being of children.
- Whilst financing social innovation is important, **effective solutions need to have long-term sustainable funding**, not just short-term 'project money', with a commitment to financing what actually works and not just what is new.
- **Structural Funds** should be used effectively to tackle child poverty and social exclusion:
 - ✓ through human resources projects (ESF) which can contribute to the Commission's proposal of 25% minimum shares for ESF and 20% of ESF on poverty and social exclusion reduction; as well as support to infrastructure improvement (e.g. childcare centres) through ERDF.
 - ✓ through encouraging transnational exchange on solutions that work, with a thematic community of practice on child poverty and child well-being as an important support to developing innovative projects.
 - ✓ through supporting the partnership principle and Code of Guidance in Structural Funds proposed by the Commission including civil society actors, and through support global grants, technical assistance and the lowering of co-financing requirements. Support to pre-financing will also be crucial to tapping into local, grass-roots projects which are developing innovative and effective responses to real needs.
- **PROGRESS/EUPSCI** - more focus needs to be given to investment in **local solutions** developed through **partnership approaches between local authorities, NGOs, children and families**:
 - ✓ Explore the potential to fund **public awareness-raising and communication** activities developed through local partnerships, in the framework of the Recommendation's implementation, across the EU 27.
 - ✓ Support a **Europe-wide campaign** which coordinates national campaigns on child poverty.
 - ✓ Recognise **the risks of a limited focus on social experimentation only through randomized controlled trials (RCT)**⁷ and evaluate these approaches in terms of their cost-effectiveness.⁸

⁶ This includes undocumented children and children of undocumented migrants with regular residence status. It is essential that funding mechanisms should reflect the realities of local implementing partners, without restrictions based on residence status of target populations.

⁷ RCT concerns may include:

- Using a model of evaluation that may not be strengths based and that may not take into account participants' varying levels of resilience and the protective factors already in place
- Lack of follow up studies of lasting impact on parents and children who participated in RCT
- The need to take into account the expense of conducting a RCT with fidelity. This model of service delivery may be unrealistic in many Member States and would be unaffordable to smaller NGOs

- ✓ Shift to supporting **testing/evaluation of effective, socially innovative solutions, developed through local partnerships which** can implement the 3 pillar approach, backed by robust evaluation and mainstreaming of results. Access for smaller NGOs should be ensured.
- ✓ **Develop national pilots/tests** that show how child well-being indicators can be used to achieve better implementation of the Recommendation.
- ✓ **Encourage mutual learning** on results (peer and thematic reviews), and a website to capture experiences. Ensure that child poverty and well-being is a priority in other funding lines e.g. DG Education, DG Justice, DG SANCO.

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- The extent to which RCTs may limit innovation. If innovation emerges from new ideas, then opting for and diverting resources to established models that have been subject to RCT methodology may limit innovation. Evaluation should be cyclical rather than a static process
 - Proportionality – it may not be economical to invest funds on a RCT for low cost models of service delivery; for ex. a micro finance initiative. Robust evidence of effectiveness can be captured in other ways including demonstrable improvement in household conditions etc.

⁸ Cost-effectiveness analysis includes different types of research work: control groups and evaluation reports, audit and inspection findings/data, routine monitoring data, client and user experience data, expert view and insider knowledge, opinion polls and stakeholder consultation.