

# Consultation on the European Pillar of Social Rights

Fields marked with \* are mandatory.

Welcome to the European Commission's online public consultation on the "European Pillar of Social Rights".

Are our social rights fit for the 21st century? The Pillar will identify a number of essential principles to address the challenges in the field of employment and social policies.

We want to involve everyone in shaping the European Pillar of Social Rights. We welcome contributions from citizens, social partners, organisations and public authorities, so have your say!

Please submit your contribution below until the end of 2016.

## I. Questions for the identification of the respondent

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**Are you replying as an individual or as an organisation?**

- Individual
- Organisation

**What is the type of your organisation?**

- Business
- EU level organisation
- National level organisation

**Your EU level organisation is a(n)**

- NGO
- Trade Union
- Employers organisation
- Think tank/academia
- Other

\*

**Name of your organisation or institution:**

*500 character(s) maximum*

European Anti Poverty Network - EAPN

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**Postal address of your organisation or institution:**

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11 Boulevard Bischoffsheim, 1000 Brussels

**Country**

For individuals: country of residence.

For organisations: country where the organisation is based or country where the organisation's headquarters are.

Belgium

**Register ID number (if you/your organisation is registered in the Transparency register):**

If you would like to register, please refer to the following webpage to see how to proceed : <http://ec.europa.eu/transparencyregister/info/homePage.do>

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Your reply:

- Can be published with your personal information** (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)
- Can be published in an anonymous way** (I consent to publication of all information in my contribution except my name/the name of my organisation and I declare that none of it is under copyright restrictions that prevent publication)
- Cannot be published - keep it confidential** (The contribution will not be published, but will be used internally within the Commission)

## II. Questions for the consultation

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The Commission invites all interested parties to reply to the questions set out in the questionnaire below, together with any additional comments, by 31 December 2016. (*See also [Commission communication "Launching a consultation on a European Pillar of Social Rights", COM\(2016\) 127 final](#)*)

### On the social situation and EU social "acquis"

## 1. What do you see as most pressing employment and social priorities?

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- Tackling growing income, wealth, & territorial inequalities within & between Member States.
- Giving equal importance to social & economic priorities, ensuring that economic policies support the development of more inclusive & equal societies.
- Addressing rampant poverty & social exclusion (1 in 4 Europeans), making progress on the poverty reduction target of Europe 2020 & on fighting growing divergences across the EU.
- Ending attacks on social rights & welfare states, including universal social protection (adequacy, coverage, eligibility) & the way it is used as a lever to push people into work, rather than seen as a human right.
- Ensuring adequate income support across the lifecycle: existing schemes generally lack effective coordination, as well as an integrated approach to the multidimensional nature of poverty. They impose inflexible & heavy sanctions & are insufficient to cover vulnerable individuals' real needs, keeping them locked in a poverty trap.
- Supporting universal, quality public services for all (particularly social, energy, housing & health); ending trends to replace universal provision with targeting; fighting unequal access to public services - threat of privatization & marketization of services (increased costs, lower quality).
- Combating negative activation (sanctions, conditionality, public work schemes) pushing people into insecure, low quality jobs (low paid, precarious contracts, limited workers' rights etc); stemming the growth of insecure, low paid work & curbing in-work poverty, by promoting high-quality, sustainable employment; fighting against youth unemployment, as well as long term unemployment.
- Addressing rising discrimination on all grounds, which is preventing people from accessing their social & employment rights.
- Formulating a visionary & coherent migration & refugee policy, rather than just dealing with the consequences.

See EAPN's full position on the Social Pillar: <http://tinyurl.com/EAPNSOCPIL>

## 2. How can we account for different employment and social situations across Europe?

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Divergences between MS are primarily to do with type of socio-economic model, different levels of commitment to inclusive growth, to progressive distribution of wealth, to effective social protection systems, & to quality work. Nordic countries are best performers, with a progressive tax system to finance quality social protection for all. Recent trends have also jeopardized social & employment performance:

- A neoliberal model prioritising 'market solutions', privileging 'growth & jobs', allowing poverty & social exclusion & precarious & unsustainable employment to proliferate.
- Faulty redistribution of income & wealth, leading to increasing inequalities & social polarization, instead of fair distribution (through decent work) & redistribution (through tax justice & progressive welfare states - social protection & universal services). No EU-wide social standards.
- The wrong response to the financial & economic crisis, led by cuts & austerity, instead of social investment in adequate social protection systems (including adequate minimum income), quality & affordable services, & quality, sustainable jobs. Budgetary consolidation restricts fiscal space for social investment. What is needed is a Golden Rule, establishing a threshold or benchmark below which social protection must not fall, with the potential to be discounted in deficit calculations as investment not cost. Without it, it remains highly difficult to promote an inclusive growth model & to ensure upward social convergence.
- The lack of overarching, integrated anti-poverty strategies, at national & EU level. Previous initiatives to take comprehensive European action against poverty & to achieve upward social conversion, have delivered limited results. The Europe 2020 Strategy, the Social Investment Package & the Social OMC seem to play an increasingly marginal role on the EU agenda, whilst the European Semester continues to prioritise macroeconomic priorities over comprehensive social reform.

### 3. Is the EU "acquis" up to date and do you see scope for further EU action?

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It is difficult to know what is understood by *acquis*, & whether soft law is equally included – such as Council & Commission Recommendations, including Country Specific Recommendations. In terms of the hard law social *acquis*, the main concern is the underlying premise of the *acquis* being developed in order to complete the Single Market. Hence, the social will always be subservient to the economic goals. The point is often made about subsidiarity & the fact that social policies are a shared competence of the EU – however, in practice, the European level has been directly interfering in the social budgets of Member States, through CSRs and other tools, with direct & explicit requirements about reducing spending, and how.

Too often, we have seen the driving force is, actually, political will, and when that exists, a legal way is found to implement it. It is time to reverse that trend. If Treaty changes are needed, then this is an option that should be on the table, to be explored with Member States.

EAPN has been consistently arguing for a Framework Directive on Minimum Income, as a cornerstone for the European Union's commitment to the fight against poverty & social exclusion, & to building inclusive, cohesive, strong societies, where people can live in dignity & enjoy the benefits of prosperity. EAPN has commissioned a legal opinion (<http://www.eapn.eu/wp-content/uploads/2016/07/EAPN-2010-Minimum-Income-Directive-legal-assessment-107.pdf>) on the feasibility of such an initiative within the current Treaties, which has received a positive response, & we have also prepared a full proposal (<http://www.eapn.eu/wp-content/uploads/Working-Paper-on-a-Framework-Directive-EN-FINAL.pdf>) of how such a Framework Directive could look like.

## On the future of work and welfare systems

### 4. What trends would you see as most transformative? [Please select at most three from the list below]

*between 1 and 3 choices*

- Demographic trends (e.g. ageing, migration)
- Changes in family structures
- New skills requirements
- Technological change
- Increasing global competition
- Participation of women in the labour market
- New ways of work
- Inequalities
- Other

Please specify:

Growing levels of poverty & social exclusion (due to low quality work & employment, deterioration of universal social protection systems, privatization & marketization of services, loss of solidarity & equal opportunities, poor stakeholder engagement mechanisms, as well as discrimination + global inequalities driving migration.)

## 5. What would be the main risks and opportunities linked to such trends?

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Risks:

- Watering down of the European Social Model & universal social protection
- More & more Europeans experiencing poverty & social exclusion & being unable to lead dignified lives & access rights, resources, & services
- Labour market flexibilisation has led to an increased number of atypical jobs, often paid less than permanent jobs & offering less career stability & social security. Flexibilisation has increased job precariousness & the number of persons in in-work poverty
- Competition between different groups pitted against each other for what is deemed scarce resources - leading to reduced solidarity, negative social policy, rise of social unrest, violence, racism & xenophobia. Rising inequalities polarise society & constitute a serious threat to the credibility of the European project, with societal groups drifting further apart rather than coming closer together
- Rise in health, educational, income & wealth & other inequalities, which directly impact on poverty, increasing polarization & undermining social cohesion, erosion of purchasing power, weakening of internal demand, undermining effective, inclusive growth - damage both economies & societies
- Entire groups (and generations) left behind - lack of faith in leaders, the establishment & the European project as a whole, erosion of democratic participation, citizens are estranged & disenchanted, questions about the role of governments to protect & promote public good

It's difficult to see opportunities in these trends. We need to reaffirm & implement a true commitment to Social Europe, putting people before profit & striving to ensure that all European have access to a life in dignity based on human rights, & that everybody is part of the European project. The recognition & evidence that such trends exist should result in a response which aims to reverse them & address their causes - but often economic considerations, many of which do not lead to good social outcomes, are given priority.

**6. Are there policies, institutions or firm practices – existing or emerging – which you would recommend as references?**

*2000 character(s) maximum*

- The Poverty Programmes
- The 1992 Council Recommendation on Adequate Minimum Income (basis for a Framework Directive)
- The Social Open Method of Coordination & its associated processes (but with stronger implementation)
- The Europe 2020 target on reducing poverty, the European Platform against Poverty & Social Exclusion, and the European Semester (particularly poverty CSRs).
- The European Charter of Fundamental Rights
- The Active Inclusion Recommendation of 2008, promoting integrated approaches that combine adequate income support, universal access to affordable, quality services, & personalized support towards quality jobs & inclusive labour markets
- The Social Investment Package, particularly the Investing in Children Recommendation & the Staff Working Paper on Tackling Homelessness & Housing Exclusion
- The earmarking of 20% of ESF for the fighting against poverty & social exclusion - and, more broadly, aligning the EU budget with Europe 2020 priorities & targets. Monitoring this process is very important & in 2015 EAPN started the elaboration of a Barometer to that effect (See here: <http://www.eapn.eu/news-and-publications/publications/eapn-key-documents>)
- The Youth Guarantee as a model, though its implementation may raise questions.
- European Parliament resolutions and reports on poverty and social exclusion (as a recent example, on meeting the antipoverty target in the light of increasing household costs, with particular focus on energy poverty - 14 April 2016).
- EAPN has organized for 15 years the Annual European Meeting of People Experiencing Poverty, together with the Commission and EU Presidencies. This practice / initiative is an example of civic participation & aims to give a voice to vulnerable citizens, listening to their perception of the impact of certain policies that are being implemented at European & national level, thus enabling a participative monitoring of the fight against poverty & social exclusion.

**On the European Pillar of Social Rights**

**7. Do you agree with the approach outlined here for the establishment of a European Pillar of Social Rights?**

- I strongly agree
- I agree
- I disagree
- I strongly disagree

Please specify:

*2000 character(s) maximum*

EAPN welcomes the rights-based approach & broadly agrees with the policy domains identified, though some aspects are missing & some nuances are lacking - see detailed analysis by domain. Our first concern is the lack of specific focus on poverty reduction and an integrated EU strategy for it. The EPSR could underpin such a strategy, but not replace it. We have important concerns about how the Pillar will interact with macroeconomic policy, ensuring that economic objectives deliver on social rights, how it would build on other existing initiatives and processes (Europe 2020 and the European Semester, the Active Inclusion Recommendation, the Social Investment Package etc). It is also unclear where this fits in the context of the Mid-Term Review of Europe 2020. We wonder how the Pillar will be implemented - by enlarging the EU's competences to deliver on these domains, through the political will to invest in hard law initiatives, which could lead to concrete results for people in poverty (eg, a Framework Directive on Minimum Income, or an EU Unemployment Benefit Scheme, or Framework on Living Minimum Wages)? How will the domains be translated into policies at national level, as the implementation of previous initiatives such as the Social Investment Package was not seriously followed up and lacked impact? Will the European Semester will be the main instrument? How will a balanced approach be pursued, adequately reflected in the Annual Growth Survey, the Country Reports, & the Country Specific Recommendations? We also wonder about the necessary funding for these initiatives - where would it come from, in a climate still dominated by cuts to public spending & hostile to social investment. Finally, we are concerned about the lack of mentioning of social and civil dialogue and stakeholder participation, beyond social partners, and including people experiencing poverty and their civil society organisations, in the content of the Pillar and concerning its implementation.

**8. Do you agree with the scope of the Pillar, domains and principles proposed here? (If you wish to provide detailed comments on any of the 20 domains, please see the section "Detailed comments by domain" below)**

	I strongly agree	I agree	I disagree	I strongly disagree
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1. Skills, education and life-long learning	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Flexible and secure labour contracts	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3. Secure professional transitions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Active support for employment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Gender equality and work-life balance	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Equal opportunities	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
7. Conditions of employment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
8. Wages	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
9. Health and safety at work	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
10. Social dialogue and involvement of workers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
11. Integrated social benefits and services	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
12. Health care and sickness benefits	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
13. Pensions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

14. Unemployment benefits	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
15. Minimum income	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
16. Disability benefits	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
17. Long-term care	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
18. Childcare	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
19. Housing	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
20. Access to essential services	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## Are there aspects which are not adequately expressed or covered so far?

*2000 character(s) maximum*

EAPN was surprised to see that poverty, social exclusion & inequalities are not mentioned as main trends / challenges, nor as a separate policy domain. The Pillar does not replace the need for an overarching, integrated anti-poverty strategy at the EU level, although it can support it. What place will it occupy in the European policy-making architecture, in relation to Europe 2020, the European Semester, the poverty target, the EPAP?

While we agree with the principles, there are significant doubts about how they will be implemented & what is understood by certain concepts. When applied at a European level in the past, flexicurity proved disastrous for social cohesion & wellbeing, by encouraging employer flexibility without the needed security to protect workers from poverty. EAPN supports integrated benefits & services, from an Active Inclusion perspective of providing adequate income support & universal quality services to all as a right, rather than using them as an activation tool. We support a comprehensive approach, rooted in individual needs and the needs of specific cultural & social groups, supporting first & foremost social participation & dignified lives. It is important to also mainstream the particular situation of refugees and migrants, currently not covered by the Pillar, and integrate a strong gender dimension in all domains.

The preliminary outline rightly emphasises the importance of ensuring adequate social protection, but an analysis of the relation between the adequacy & sustainability is missing. Whilst economic & social goals are portrayed as two sides of one coin, it is imperative that the adequacy of social protection is not undermined by fiscal concerns.

EAPN would like to see clear & meaningful civil dialogue processes to follow up on each of the domains. Civil dialogue must be on equal footing with social dialogue, and developed in a structured way for all areas, through the European Semester & other processes, with clear Guidelines.

**9. What domains and principles would be most important as part of a renewed convergence for the euro area? (Please select maximum 5)**

*between 1 and 5 choices*

- 1. Skills, education and life-long learning
- 2. Flexible and secure labour contracts
- 3. Secure professional transitions
- 4. Active support for employment
- 5. Gender equality and work-life balance
- 6. Equal opportunities
- 7. Conditions of employment
- 8. Wages
- 9. Health and safety at work
- 10. Social dialogue and involvement of workers
- 11. Integrated social benefits and services
- 12. Health care and sickness benefits
- 13. Pensions
- 14. Unemployment benefits
- 15. Minimum income
- 16. Disability benefits
- 17. Long-term care
- 18. Childcare
- 19. Housing
- 20. Access to essential services

*Comments:*

*2000 character(s) maximum*

EAPN advocates for social inclusion through comprehensive, integrated Active Inclusion approaches, which ensure access to rights, resources & services for all. This makes it difficult to cherry pick only some of the domains above, because the others are just as important, but also because they are mutually reinforcing, and one dimension won't work without the other ones. All the above are important elements if they are presented in a progressive form, and if they focus primarily on reinforcing the rights & needs of the individual, rather than benefits to economic growth. It is the synergies between all domains that deliver better lives for people, as well as better social, societal, & economic outcomes. See EAPN's full position on Active Inclusion here: <http://tinyurl.com/EAPNAIMIH> and here: <http://tinyurl.com/20AIEAPN>

**10. How should these be expressed and made operational? In particular, do you see the scope and added value of minimum standards or reference benchmarks in certain areas and if so, which ones?**

*2000 character(s) maximum*

Statutory minimum wages should be living wages, linked to inflation & the cost of living, above the poverty line, based on reference budgets, in a positive hierarchy with adequate minimum income. Earnings gaps (gender, ethnic etc) and the wage share in relation to higher salaries, GDP and profits, need closing. Work must ensure dignified living, boost consumption & demand, and strengthen the tax base.

One-stop shops need to promote qualitative services & adequate benefits, start from the perspective & benefit of the user, ensure better delivery & outreach towards beneficiaries. We denounce negative conditionality & the use of benefits & services as levers to 'reduce disincentives to work', instead of preventing poverty & social exclusion for all throughout the lifecycle, including for those unable to work.

Adequate social protection is the cornerstone of the European Social Model. Income security is a crucial prerequisite for (re)integration in both the labour market & society. Lack of financial resources leads to poor educational & health outcomes. Adequate income support is a right & has a key role in both preventing & tackling. It is an automatic stabiliser, key tool to reduce inequality & foster sustainable & inclusive growth. A Framework Directive on Adequate Minimum Income would be an important step (see significant work carried out by EAPN and as part of the EMIN & the Reference Budgets projects).

Service provision should be universal, part of the State's duty to provide services of general interest to all, complemented by targeted intervention, supporting key groups. Services need to be of quality, affordable & accessible to all. "Essential services" indicates minimum provision, rather than comprehensive, needs-based support. Flanking services play a key role in supporting those who can work into employment, but access to services is a right & the role of services is primarily to promote & support decent living for all groups.

**Detailed comments by domain**

If you wish to provide detailed comments on any of the domains, please select one or more from the list below and fill the table(s) and comment box(es) underneath. (A detailed description of the domains and principles is available in the [Annex "A European Pillar of Social Rights - Preliminary Outline"](#) to the [Commission communication "Launching a consultation on a European Pillar of Social Rights"](#), COM(2016) 127 final).

- 1. Skills, education and life-long learning
- 2. Flexible and secure labour contracts
- 3. Secure professional transitions
- 4. Active support for employment
- 5. Gender equality and work-life balance
- 6. Equal opportunities
- 7. Conditions of employment
- 8. Wages
- 9. Health and safety at work
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- 15. Minimum income
- 16. Disability benefits
- 17. Long-term care
- 18. Childcare
- 19. Housing
- 20. Access to essential services

### 1. Skills, education and life-long learning

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

*2000 character(s) maximum*

Ever since the Lisbon Strategy, education was clearly recognized as a prerequisite for social inclusion - education is not only an instrument to get people into jobs. Education should primarily be supported as an instrument for personal, community & social development, including knowledge of rights, and to support citizens' participation & contribution to vibrant, socially cohesive societies. Education is more than schooling, & has a fundamental role in promoting citizenship, empowerment, awareness, and social participation. Nothing is said about inclusive education for all (essential for social mobility), combating segregation & discrimination, ensuring equal access, second chance education, formal & informal learning, & financial support to ensure these. Stronger efforts are necessary to break the link between education & social background being a prerequisite for inclusion & participation. For more about EAPN's position on education, see the Education chapter of our NRP report analysis 2016 here: <http://www.eapn.eu/news-and-publications/publications/eapn-key-documents/>

**2. Flexible and secure labour contracts**

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

*2000 character(s) maximum*

Flexible contracts enforced by employers, as opposed to employee initiated flexibility (ie internal) severely undermine labour rights & enforce precarious contracts & in-work poverty. Clear distinction must be made between the two (ie voluntary part-time working or flexitime for work/life balance, compared to zero hour contracts, or forced part-time working).

Employer-enforced flexibility must be compensated by adequate social security or other forms of retribution, so that the worker does not end up paying the costs. It is equally important to highlight bogus self-employment, as an increasing trend, undermining social protection & future pensions. A further development is 'work fare' programmes, which are replacing paid positions with enforced labour, in countries like Hungary, the Netherlands etc, increasing precariousness & poverty. Gateway jobs must ensure secure transitions. For more details about EAPN's position on Quality of Work and Employment, including contractual arrangements, see here: <http://tinyurl.com/QWEAPN>

### 3. Secure professional transitions

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

*2000 character(s) maximum*

This section does not set out how to provide secure professional transitions, only how to allow flexibility. It worryingly mentions that some of the entitlements of jobseekers or inactive persons should not become disincentives to re-starting work, which may be used as a gateway for negative activation with sanctions and conditionality. What is strikingly missing are references to income support (like minimum income schemes and unemployment benefits), what happens when unemployment benefits run out, and access to services. Nothing is said about vulnerable groups, including - among many others - migrants, refugees, and ethnic minorities such as the Roma, who need specific support, or about holistic, comprehensive approaches. Equally, better intergenerational solidarity could be better supported, to ensure both active ageing in a respectful, dignified way, as well as more opportunities for young people entering the labour market. For the training of low-skilled people, new educational tools are needed, which are tailored to disadvantaged groups or individuals facing multiple obstacles. It requires e.g. modular parts to enable interested persons both the opportunity to interrupt training as needed or extend it. Also, during prolonged training, livelihood must be secured reliably. For more details about EAPN's position on Quality of Work and Employment, see here: <http://tinyurl.com/QWEAPN>

#### 4. Active support for employment

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

*2000 character(s) maximum*

No other key groups are mentioned (except youth / long-term unemployed). The section does not look at the specific obstacles faced by groups who are furthest from the labour market, such as single parents, people with long-term sickness, disability, and health problems, ethnic minorities, eg Roma, migrants and refugees. The section equally does not consider the problem of in-work poverty. It should emphasize personalized, tailored approaches, with flanking services & income support, as part of Active Inclusion integrated strategies. It should reference specific issues around active ageing, where older people are dismissed & unable to re-enter the labour market (often due to age-based discrimination) or to access their pensions. The article 151 of TFEU should include the term 'quality' employment. It would be important to implement the Council Directive 2000/78/EC of 27 November 2000, establishing a general framework for equal treatment in employment & occupation. For more details about EAPN's position on Quality of Work and Employment, see here: <http://tinyurl.com/QWEAPN>

### 5. Gender equality and work-life balance

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

*2000 character(s) maximum*

Gender equality is addressed primarily in relation to work, but less to other areas. A recognition should be made that more women are at risk of poverty, even under the current indicators where women's position is hidden within the household. No mention is made of tackling the issue of fair 'valorisation' of currently low-paid & undervalued 'women's jobs', particularly in the caring professions, which bear no relationship to the actual level of skills used. Care should be used in the terminology regarding sexes, to ensure support for same sex & single parent families & households and to guard against discrimination. A further area is the issue of 'glass ceiling' & access to high level posts, as well as position on boards, and in political representation. It is important to promote more flexible working time models, supporting parents in reconciling work & family. In the sense of gender equality, better incentives to take on caring responsibilities & measures to reconcile work & private life should be created for men. The proposal of a paid parental leave for men & women is supported. The right of return from maternity & parental leave to the previous job or an equivalent to the same conditions should be enshrined in law. The often difficult situation of single parents has to be underlined.

## 6. Equal opportunities

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

*2000 character(s) maximum*

Because it is not part of the Anti-Discrimination Directive, discrimination based on socio-economic background is not mentioned, nor proposed to be tackled - an aspect which EAPN would insist on seeing changed. The approach to anti-discrimination is exclusively in about the labour market. Also, some types of discrimination, such as that against older workers, or Roma people, are difficult to prove and often considered 'the norm', so not sanctioned. Hate speech is not properly addressed, either. In a number of Member States, the employment rate of third-country nationals is significantly below the one of the native population. This is especially a problem in the context of the current increased migration of refugees. Among the refugees, there is a high percentage of young people without formal qualifications. Hence, an individual support in cooperation with youth welfare service & employment promotion is required. This includes access to language courses & to give priority to vocational training before employment.

## 7. Conditions of employment

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

*2000 character(s) maximum*

One of our main problems is zero hour or flexible (external) contracts, present in some countries, where the employee has no idea what hours they will work in a week, or wages they will receive. This means income is insecure, as well as contributions. The EU should be backing 'firm' contracts, even if these are not full time, so that people can plan their lives & income. The issue of undeclared work is also not mentioned. Temporary contracts can provide some flexibility, if clear pathways are made to ensure transitions, and to avoid abuse of 'repeated' temporary contracts, & revolving doors into unemployment. Adequate unemployment benefits & income support is also not indicated as key. For more details about EAPN's position on Quality of Work and Employment, see here: <http://tinyurl.com/QWEAPN>

## 8. Wages

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

*2000 character(s) maximum*

As a complement to what was already said, this section does not clarify how adequate wages are to be set, and it recommends the evolution of wages in line with productivity, decoupled from inflation. It also doesn't speak of fair wages as a right, while this is an important point to strengthen in times of highly precarious & insecure employment. The question of whether wages should be sufficient for a family is also not raised. Raising wages in line with productivity is only valid if decent wages are in place in the first place. General minimum wages are an important measure to prevent low wages & enforce fair wages. The level of the minimum wage should be a living wage, ensuring that employment is worthwhile for unemployed persons. For more details about EAPN's position on Quality of Work and Employment, see here: <http://tinyurl.com/QWEAPN>, as well as our position on In-Work Poverty: <http://tinyurl.com/EAPNIWP> and our awareness-raising action on Living Wage: <http://tinyurl.com/EAPNLW>

### 9. Health and safety at work

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

*2000 character(s) maximum*

One aspect to be highlighted is the importance of adjusting workplaces to the needs of older workers & people with disabilities or health conditions, as well as of supporting flexible schedules that respond to their needs, without endangering the adequacy or security of their income. This is an essential prerequisite in a context where people are expected to stay ever longer on the labour market, where jobs are covered by precarious contracts, as well as enforced self employment and home working. In this area, the problematic situation of domestic helpers could be highlighted. For people in need of care & their families, hiring domestic workers is an adequate solution to provide care at home - however, it is often not under fair conditions, labour protection laws & working time arrangements are often not respected, nor are workers paid minimum wages. It must be made easier to legally hire domestic workers who have to be adequately paid, as well as get social & health insurance. Psycho-social effects of work, including burnout and other similar phenomena, need also be tackled.

## 10. Social dialogue and involvement of workers

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

*2000 character(s) maximum*

EAPN finds the exclusive mention of ‘workers’, not people, and ‘social partners’, not also civil society, as very worrying. In the area of employment, although we strongly support the role of social partners, particularly trade unions, there needs to be a role for organizations that work with the unemployed, & are supporting people into work in discussions on how to best support people into quality jobs. Equally, the Social Pillar is not (should not be) just about employment, but about broader social participation & social inclusion, so the role of civil society organisations, as well as meaningful processes of stakeholder engagement & civil dialogue are a must, in our view. See more about EAPN’s work on fostering civil dialogue and stakeholder engagement in the European Semester:  
<http://tinyurl.com/EAPNGCAV>

### 11. Integrated social benefits and services

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

The text also speaks of aligning eligibility & coverage, and mentions that better integration can improve the cost-effectiveness of social protection, but nothing is said about the quality of the services, the adequacy of the benefits, or how it would improve delivery of both. The emphasis should be on ensuring adequate support to the beneficiary in terms of maintaining livelihoods - through quality income support & services, helping people access appropriate, quality training and/or employment, for those who can work - at the moment, the focus seems to be exclusively on 'institutional' efficiency. Quality should be core to the domain & its definition fully developed. It is essential to incorporate user participation, which is key to a person-centred provision of (integrated) services that are tailor-made to the specific needs of each user. There should also be an awareness of issues of trust - often, when benefits & activation services become aligned in one-stop shops, this results in threat of sanctions or reductions through tightened eligibility & conditionality, & punitive activation approaches. This can undermine a positive relationship, which is essential between the employment or job search adviser & the client. The provision of integrated benefits & services should be regarded as a right, not a tool to get people into work. Those not of working age, or unable to work, are just as entitled to comprehensive support. Finally, the principle of integration between benefits & services is essential for social delivery and, therefore, should be mainstreamed across the Pillar, well beyond an employment-centric stress on work inclusion services only (as suggested by the limited definition of the domain). Long-term care, disability, health care & sickness benefits & services should also envisage integration as a desirable goal. See EAPN's full position on Active Inclusion here: <http://tinyurl.com/EAPNAIMIH> and here: <http://tinyurl.com/20AIEAPN>

## 12. Health care and sickness benefits

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

The focus should be more specifically on affordability, coverage, & tackling growing inequalities, supporting free services at the point of entry, particularly for low income households. Increased out-of-pocket payments is drastically reducing access & increasing unmet health need, as well as poverty. Dental care is becoming a luxury the poor cannot afford, as it is rarely covered - however, it plays a significant part in social & professional inclusion. The section doesn't mention rising prices of medicine, & the need to support generic brands, investment in prevention & early treatment, and reducing risks & costs of more serious illnesses. Cuts to social protection & services, as well as to quality work & early learning, are proven to be key social determinants of increasing health inequalities. Guaranteeing the financial sustainability of health systems, as well as encouraging the cost-effective provision of care, is being prioritized over quality, accessibility, & affordability. It is not said how the promised universal, & affordable access will be ensured & financed, for all groups across the EU, nor is prevention mentioned. Regardless of the type of contract, all employees should receive an adequate cash benefit in case of illness. An EU-wide minimum level & period of coverage could be established. Health care should also be made accessible to excluded groups, including people who live undocumented in the EU & for EU citizens who are homeless or without health insurance. Access barriers & disadvantages for chronic ill people with low incomes should be eliminated. Health systems should always be financed in solidarity, with increased support from general taxation to reduce inequalities. Patients' rights are to be expanded. Tackling the social determinants of growing health inequalities is also crucial - recognizing the key role of quality work, social protection. See EAPN's work on Health Equality: <http://www.eapn.eu/drivers-for-health-equality/>

### 13. Pensions

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

Sustainability seems to be a main focus, rather than rights, likely to take precedence over adequacy & coverage. Linking the statutory retirement age to life expectancy & avoiding early exit from work doesn't clarify how to make labour markets inclusive & accessible for older workers. The gap in healthy life years, the different nature of jobs, as well as life expectancy between low & high income quintiles, must also be recognized, & should be a factor in the setting of retirement ages (ie, not a one size fits all). The raising of statutory retirement ages unfairly prejudices the poor, whose life expectancy is much shorter. This is, therefore, an implicitly regressive & discriminatory measures, condemning people in poverty - who often have been stuck in hard, onerous, low-paid jobs - to poverty in old age, without the assurance of timely access to adequate pensions. Last but not least, the gender & ethnic pay gaps entails a further gender & ethnic pension gap. A major challenge is the implications for pensions (and indeed other social protection & health benefits) of increasing flexibility of contracts, reducing the overall contributions through one's working life. A stronger statement should be made on the need to ensure adequate, universal, Pillar 1 pensions, as the key means to prevent poverty in old age, rather than enforced Pillar 2 & 3, which will unfairly discriminate against low income households. In pension systems based on social security contributions, it is doubtful how precariously working self-employed will be able to participate adequately in the pension system, as these are often already overburdened with health insurance contributions. A key point in securing the pensions is the elimination of precarious employment. This includes measures to improve work-life balance, the sustainable inclusion in the labor market, for adequate inclusion of periods of inactivity, to ensure living wages & full social security contributions.

#### 14. Unemployment benefits

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

*2000 character(s) maximum*

The text says that, for those of working age, these benefits shall include requirements for participation in active support to encourage labour market (re)integration, but this separation excludes those of working age, but unable to work. It would be important to reinforce the need for unemployment benefits to also be extended to self-employed workers. The text also does not specify the duration & the importance of overlap with a comprehensive income support system - ie, when people can no longer claim unemployment benefits - & their access to social assistance & other related benefits. A proposal should be that unemployment benefits cover at least 18 months, to enable people to search for work, particularly in a job-scarce economy. The issue of young people's lack of eligibility is also a concern, if they have not worked sufficiently, or at all. The requirement of unemployed to conduct an active job search must not be accompanied by sanctions. Because who accepts precarious employment has to waive existence maintenance benefits for food, clothing & housing. This exacerbates poverty, but sets no incentives against precarious employment. The return to employment should not only be fast, but also sustainable; therefore, the quality of employment is important. For more details about EAPN's position on Quality of Work and Employment, see here: <http://tinyurl.com/QWEAPN>

## 15. Minimum income

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

The text should recognize the wide differences in adequacy & coverage in the EU, with several MS not guaranteeing a universal right or level across the country. The proposed text introduces conditionality, rather than respecting the distinctive rights to adequate income support, quality services, & inclusive labour markets. It negatively makes the receipt of benefits conditional on requirements to participate in activation. This undermines the fundamental rights & Articles 34 & 151 TFEU. The text says that, for those of working age, these benefits shall include requirements for participation in active support to encourage labour market (re)integration, but this separation excludes those of working age, but unable to work. The statement also fails to differentiate between different types of activation. Too often, activation measures are not aimed at providing decent jobs but any job (regardless of a person's qualifications), leading to irregular employment & precarious contracts. Active labour market measures need to empower individuals & refrain from a one-size-fits-all approach. Young people are often not able to access minimum income, forcing them into often unwanted dependency on their families, without a source of independent income & base to look for work or to participate in society. Whilst it is mentioned that many MI schemes fall below the poverty threshold, a description of methods to safeguard adequate benefit levels is missing. Adequate MI schemes should correspond to the real needs of their users by relying on a mixed method approach. Apart from the 60% equivalised median income indicator, additional factors such as reference budgets & statistical analyses of consumption patterns should be considered. Indexation mechanisms are necessary to ensure that adequate minimum income is in line with price developments, & the purchasing power of beneficiaries does not decrease. See more on EAPN's extensive work on minimum income: <http://tinyurl.com/MICEAPN>

## 16. Disability benefits

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

*2000 character(s) maximum*

The focus is overly on employment, rather than rights of people with disabilities. The text uses wording such as “enabling services” & “basic income”, rather than comprehensive, quality, & adequate. Services should enable an independent, dignified life, with adequate income security, & pro-active support into quality jobs, which allow a decent standard of living, for those who can work. Care should be taken to avoid poverty traps, by ensuring that access is created to quality jobs with living. The EU has signed the UN Disability Convention. The achievement of its rights must be implemented in the EU Member States. Considerable efforts are still needed. Regardless of the type, extent & severity of the individual disability without age-restriction the legal right of each individual & possibly lifelong participation needs of people with disabilities must be covered & guaranteed.

### 17. Long-term care

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

*2000 character(s) maximum*

The role of older people in the management of their own care should be mentioned. A legal right to dignified care must be the focal point of care policies. A person-centred dimension of LTC services should underpin its definition, to introduce an active role of LTC users & their families. An individualized, tailor-made approach does not necessarily translate into more expensive LTC, but rather would lead to more effective outcomes, plus strengthen the preventive (and future cost-saving) side of interventions. Persons with disabilities & long-term illnesses, as well as any other users of LTC should be equally included in an explicit manner. Affordability should be defined, taking into account the circumstances of the individual & their family, particularly for people on low incomes. The potential of integrated care is not acknowledged, though integrating care, services & supporting activities means that the design & delivery of care is more effective, better suited to users' needs. The emphasis on quality is welcome, though it should not be subordinated to affordability. Privatisation of care services, including LTC, should be resisted, to ensure the preservation of quality & affordability. A better balance between private & professional life is also needed for informal carers, as well as better training, recognition of skills, & a clear legal & contractual status, with fair wages & adequate social protection. To prevent poverty of caring family members, who are unable to pursue full employment, the introduction of a national statutory care insurance in which employers pay equally a share is an option. The European Voluntary Quality Framework for social services as a reference to promote quality LTC across the EU.

## 18. Childcare

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

*2000 character(s) maximum*

The subject of rights must be clarified - in terms of rights of the parent or carer, & the rights of the child. More emphasis is needed on quality early childhood education & care (ECEC), as well as learning with educational & development objectives for the child, rather than childcare only as an instrument to enable women to work. A key concern is proximity of childcare services, as well as the link to affordable, frequent & reliable transport. A specific mention is needed for support for special needs children, integrated into comprehensive childcare & education systems, & against segregated services, as it has been done for Roma children. Services should be adapted to meet the needs of a wide & diverse range of households & protection against bullying needs to be in place. Early learning centres should also not be conditional on parents' working or jobseeking status - all children have the right to get this support, as a key means to counter the intergenerational transmission of poverty. Finally, deinstitutionalization should be a priority. The rights of the child should be more clearly highlighted, in line with the UN Convention. The 2013 Recommendation "Investing in Children" needs better implementation through the European Semester and other frameworks. See EAPN's full position on child poverty and wellbeing: <http://tinyurl.com/EAPNCPWB>

## 19. Housing

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

The major missing element here is the focus on housing rights, as well as references to affordability. The current housing crisis is not just about supply, but the market has failed to provide adequate housing for low income households. Supporting the housing market as a growth measure will not ensure that housing is affordable, good quality, & in the areas where people live - ie, where the jobs are, with particularly reference to low income & excluded households. We would wish to see a right to adequate & affordable housing for all, recognizing that, for most low income households, owner occupation is not a sustainable or even desirable option. Adequate rents can be ensured with rent control or caps, but most importantly through investment in quality social housing - reversing the negative trend across the EU. In relation to the homeless, reference should be made in the principle to the promotion of 'housing first' approaches, with personalized support from refuge to normal housing, accompanied by social services & adequate income support & social protection. The right to housing is enshrined in Art. 11 of the International Covenant on Economic, Social & Cultural Rights. Therefore, the proposed right of access to social housing is important. Rental costs & deposits of low-income people must be part of a minimum income scheme or otherwise financed by the public. In providing housing services, the link with other social services such as debt advice & psycho-social counseling is very important.

## 20. Access to essential services

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

*2000 character(s) maximum*

We are missing references to any other services (right to water, social services, counselling & support services, addiction, over-indebtedness etc). We would put the right to water & energy as first priority, as 'essential services'. The text should reassert the obligation for ALL Services of General Interest to be accessible, affordable, good quality, to promote social inclusion & prevent poverty. This is the common good. Specific/tailored support should only be an additional feature, to ensure quality & effective take up, ie special rates/services are less desirable than ensuring all services are accessible. Essential services must be of high quality. Energy debt & power cuts are common for many low-income households. Adequate minimum income schemes would ensure that there is no shortfall in payment for essential services, such as energy, water, heating, Internet. See, for example, EAPN's Working paper on Energy Poverty: <http://tinyurl.com/EAPNEPOV> and EAPN's work on Social Innovation: <http://tinyurl.com/EAPNSIB>. In addition, counseling centers for over-indebted people are recommended to all Member States. 30 million people, i.e. 7% of the EU population, don't have access to quality, transparent financial services (Flash Eurobarometer 282). Financial inclusion entails open access to basic financial services for all, regardless of socio-economic or legal status, as well as service transparency & appropriateness, as persons may have access to a service but use it ineffectively, or find that it does not correspond to their needs. This is based on an understanding of banking services as public goods, essential to social participation & therefore to the achievement of social cohesion. A lack of financial inclusion directly & disproportionately impacts the most vulnerable members of society, particularly elderly persons & individuals with lower education.

## Contact

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