



## EAPN comments and recommendations on the Commission proposal on Guidelines for preparing national reports on strategies for social protection and social inclusion

March 2006

### General appraisal

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EAPN welcomes the opportunity to contribute to the draft Commission proposal on Guidelines for preparing the National Reports on social protection and social inclusion. These Guidelines are an indispensable accompanying document to the publication of the communication on the streamlined OMC on social protection and social inclusion which gives the orientation to the revised Open Method of Coordination on Social Protection and Social Inclusion to be adopted at the 10 March EPSCO meeting. Although a technical and supporting document, **these guidelines are pivotal in defining the mechanisms and scope of Member States' contribution to delivering an effective OMC on social protection and social inclusion.** They need to remain ambitious in defining a clear framework for promoting the European added value of this process. The onus will then be on Member States to deliver on a strategy which is potentially the strongest tool in the hands of the EU to deliver on its objective of **greater social cohesion.** The Guidelines will also be an important reference document to support active stakeholder involvement in the process.

#### A clear and ambitious framework

EAPN welcomes the draft guidelines, which are very **ambitious**, highlighting the need to ensure **mainstreaming** and an integrated and multi-dimensional approach, coordination with other strategies, and an increased strategic focus. The guidelines are also **clearer** and more developed than those applied in former rounds of NAPs inclusion – this may also be due to having taken account of past learning and shortcomings, for example with regard to the 'implementation gap'. Moreover, they define a structured framework for continuing work under the **separate strands, including the development of separate National Action Plans on inclusion**, while at the same time addressing the 'streamlined' approach to social protection and social inclusion policies. Finally, the guidelines also ensure gender and anti-discrimination mainstreaming.

EAPN is nonetheless concerned by how the guidelines can be applied at Member State (MS) level. EAPN's primary plea is for the OMC National reports based on these guidelines to be informed by **fully fledged Action Plans at national level developed with active stakeholder involvement**, which would themselves develop ambitious and comprehensive social inclusion and social protection policies.

## Maintaining EU added value

The guidelines seek to balance the new set of 'streamlined' and somewhat broader objectives – particularly as regards social inclusion - with a request for very clear objectives reflecting national policy priorities. Although this is done in an effort to address the implementation gap, at the same time it risks to take away the **added value** of the European strategy and moves us even further from the idea of recommendations and targets for a European strategy. The Guidelines must ensure a minimum common approach sufficient to ensure that this remains an EU strategy that is capable to contribute to the objective of making a decisive impact on the eradication of poverty and social exclusion in the EU by 2010. In this respect, reference in the document to developing tools such as independent analysis and research, monitoring, target setting and mainstreaming are crucial and should be welcomed and supported.

## Meeting the needs of particularly vulnerable groups

EAPN insists that the ambition of the EU must be to eradicate all forms of poverty and should not be limited to an ambition to only address extreme poverty. While we believe progress has been made in this regard in relation to the objectives for the revised strategy we are concerned that the clarity which was in the Nice objectives about the need to ensure that actions do meet the needs of particularly vulnerable groups could be lost in the revised strategy. The Guidelines need to pick up on this element, which is not explicit enough in the revised streamlined social inclusion objectives, and refer to past Council meetings and Joint reports which highlight groups particularly at risk. A clear invitation to Member states to address these most pressing concerns is necessary.

## Proposals for changes in the draft guidelines :

To reflect the above concerns, EAPN suggests the following changes to the draft document. Where additions are proposed to the present draft these additions are in bold. Proposed deletions to the present text are in strikethrough:

### Part 1 – Common Overview

#### 1.2 Overall Strategic Approach

- "It will also be important to show ~~how consistent~~ **the mutually reinforcing nature of the strategies adopted under these objectives and the** ~~it is with~~ Member States' National Reform Programmes **and how these approaches will contribute to meeting the objective of making a decisive impact on the eradication of poverty by 2010."**

*Comment: The overall strategic approach should link to the overall aim of making a decisive impact on the eradication of poverty and should stress the mutual reinforcement of the various strategies and plans.*

- "To increase the potential for comparisons and mutual learning Member States are requested to particularly concentrate on **the key priorities identified in the EPSCO Council meeting of March 2005 and those highlighted in the 2005 and 2006 Joint reports** ~~four key areas repeatedly identified by various Councils~~".

*Comment: The four priorities identified in the draft are only some among the list of priorities identified in recent Council meetings and in the 2005 and 2006 Joint report on SPSI. It would be more helpful that all priorities were mentioned, and not simply a selective list.*

- Page 4 "- second, how the growth and jobs strategy ~~takes due account of~~ **is actively delivering on** the objective of greater social inclusion (...)"

*Comment: the mention of 'due account' is weak and needs to be strengthened*

## Part 2 – National Action Plans for Inclusion

- Introduction: “The National Action Plans for social inclusion (NAPs/inclusion) are the social inclusion pillar of the National Reports on Strategies for Social Protection and Social Inclusion. They should **draw on** ~~serve as~~ **a more detailed** national plan for social inclusion and should aim to make a decisive impact on the eradication of poverty and social exclusion. **The detailed Plans can be included in an annex.** ”

*Comment: EAPN is aware that this is the approach being taken by a number of Member States. References to the development of more detailed Plans at national level should be included or strengthened throughout the document, and governments should be strongly encouraged to follow this advice.*

- P. 7 : *Strengthen governance* : “The governance of policies and practices to combat exclusion is of vital importance and needs to be strengthened. Thus the NAPs/inclusion should take into account the importance of the regional and local dimensions while respecting the different distribution of competencies in different Member States and involve regional and local authorities in the preparation, implementation and monitoring of their plans as appropriate. **Countries where NAPs/inclusion have been developed at local and regional level, are also invited to mention these.** They should show how Member States have involved as broad a range of actors as possible in **an ongoing structured dialogue**, in particular social partners, NGOs and social service providers, **and people experiencing poverty in all stages of development, implementation and monitoring of the process** ~~the preparatory process~~. (...) Member States **are encouraged** ~~may wish~~ to use the preparation of the NAPs/inclusion as a means of increasing awareness of and debate about **poverty and** social inclusion issues both amongst the general public and amongst policy makers and practitioners, including national parliaments.”

## Structure for the NAPs/inclusion

### Section 2.1 – Key Challenges, Objectives and Targets

- Add to the list in paragraph 2, starting with “In selecting and justifying these key objectives (...) the following points:
  - An assessment of how the **priority objectives identified will help to identify measures which will address the needs of particularly vulnerable groups.**
  - An assessment of how the **objectives identified will contribute to the prevention of poverty and social exclusion.**

*Comment: the objectives of prevention of poverty and addressing the needs of the most vulnerable are well developed in the Nice Objectives and should also be reflected in these guidelines.*

- “Overall quantified targets should be set for reducing the number of people at risk of poverty and social exclusion by 2010, with, as appropriate, interim targets for the period covered by the plan. (...) When necessary they should also draw on national **or subregional** data which better reflects those aspects of poverty and social exclusion that are a priority for a Member State. ”