



Social Protection Committee

Ad-hoc Group on Child Poverty

The Secretariat

2012 COMMISSION RECOMMENDATION ON CHILD POVERTY

QUESTIONNAIRE FOR STAKEHOLDER CONSULTATION

11.11.21

An SPC ad hoc group has been set up to advise the European Commission in developing the 2012 Recommendation on Child Poverty.

Members of the group have expressed their interest in hearing stakeholders' views on the Recommendation's background, possible content and implementation. A consultation meeting with the Group's chair (Ms Toula Kouloumou, SPC Member, Cyprus) will be organised in this view on 14 December.

The list of questions below highlights issues on which the stakeholders' views would be especially helpful. The outcomes of the consultation will feed into the Ad-hoc Group's work, and, more generally, the Recommendation's drafting process and impact assessment.

Many thanks for sending replies by 21 December 2011 to the following address:

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Indicative list of questions:

1) What is in your view the added value of developing a specific EU initiative addressing the situation of children at risk of poverty and social exclusion (in addition to existing EU initiatives, in particular in the framework of Europe 2020 and the Social OMC)?

An EU Recommendation should provide a framework for action to deliver holistic strategies to tackle Child Poverty and promote child well-being throughout the EU. These should be based on core principles, reflecting the consensus build with member states and national stakeholders of the most effective methods, through the Social OMC. To be effective, it must be backed by strong political will and clear mechanisms to move beyond in-principle agreements to action at the national level, with a road map for implementation and follow up. The strategy should act as a benchmark, with clear indicators reflecting the three pillars (adequate resources, services and rights/participation) and a monitoring framework to review progress, through the Social Report and other mechanisms of the Social OMC and the NRPs, and ensure access to EU funds, particularly Cohesion funds to support delivery.

The Recommendation should build on the substantial body of evidence and experience from the work of the Social OMC, supporting a rights'-based, multidimensional, holistic strategy for preventing as well as alleviating children at risk of poverty and social exclusion and promoting child well-being. It is crucial however, that it forms part of an overarching EU and National Strategy to promote social protection and social inclusion for all, under the Social OMC. Specific follow up on the Recommendation should be monitored explicitly in the National Social Reports and findings and recommendations fed into the NRPs.

In the context of Europe 2020, a sub-target on children and other priority groups at national level, could help to drive visibility, commitment and implementation, but needs to be promoted in the context of a more viable and achievable overall poverty target. (see last question).

2) Within the areas highlighted below, what essential principles should feature in the Recommendation? Should specific elements be added to the policy suggestions developed over the last years and in particular in the framework of the OMC (see ANNEX)?

- **Support to families (in particular access to labour market for parents, income support);**
- **Access to key services (childcare, education, healthcare, housing, social services);**
- **Children's participation (for instance in social, recreational, cultural and other activities).**

EAPN believes that any strategy to tackle Child Poverty must be consistent with an overall strategy to fighting poverty and social exclusion, and reducing inequality, rooted in a universal, integrated and multidimensional approach based on fundamental rights. Our Key

Messages, as highlighted initially in EAPN's report during the light year on Child Poverty¹ continue to be relevant:

- 1) **Everybody only gets one life:** everybody has a right to a life free of poverty. Child poverty is a vital focus, but needs to be embedded in universal, preventative, rights-based approaches to combating poverty for all.
- 2) **There are no rich children in poor families**
Child poverty needs to be considered alongside family policy. Effective policies should prioritise integrated, multidimensional approaches which support the family in all its forms and provide a better environment for the child
- 3) **Listen to children and to parents**
Policies must be based on human rights, dignity and participation of all. This means promoting the rights and participation of children and young people, but also their parents, recognising gender concerns and broader models of family and household care.

EAPN supports the three pillar approach and supports Eurochild's concern that this should give the emphasis to a broad, integrated, multidimensional approach rooted in the UN Convention on the Rights of the child. We refer to the wording highlighted in the EPSCO June Council Conclusions echoing the Trio Presidency declaration of the conference organized under the Belgian Presidency in 2010: Roadmap for a Recommendation on Child Poverty and Child Well-being, and the Background Paper prepared by the Presidency and key stakeholders :

- 1) Access to adequate resources, 2) access to quality services and 3) ensuring the participation of children and young people.

We would also highlight the usefulness of linking the Recommendation to the Commission's Recommendation on Active Inclusion, particularly as related to the first two pillars – to ensure consistency and useful synergies between the implementation of the two Recommendations.

A strong recognition must also be given to the impact of the crisis and particularly austerity measures on growing rates of child poverty, and confirm the need to ensure that key family benefits and services are protected from cuts.

1) Access to adequate resources.

a) Ensure adequate family income for a dignified life

Child poverty cannot be tackled narrowly through employment only focussed policies. Reinforcing the family benefits system, ensuring adequate minimum income at least above the relative poverty threshold for families to support a dignified life, is essential to prevent as well as combat child poverty. Recognition needs to be made of the specific additional costs of raising children and providing an adequate environment for children of different ages. The single most effective way to cut child poverty is to provide universal child benefit underpinned by adequate minimum income schemes related to real needs. Child benefit is

¹ EAPN (2008) Light year: Hard Work: Assessing the National Strategic Reports on social protection and social inclusion impact on poverty.

usually paid directly to the main carer. This helps take up and to counter the difficulties of an often unequal distribution of income within the household and to ensure that the main carer (still most often the woman), is able to use the resources for the benefit of the children.

Activation measures that cut welfare benefits to force parents into any job and which keep benefits below declining low pay rates have disastrous effects on children's and parents welfare. The long-term social and economic costs – including the health costs, should be more consistently highlighted and monitored.

Recognition should be made of the impact of the austerity measures currently on family benefits (and services). EAPN members in the 2011 report on the social impact of the crisis, highlighted the impact of cuts to child and family benefits and supported Eurochild's concern of a sacrificed generation.² Specific guidance should be made in the recommendation of the importance of defending/restoring benefit levels and eligibility criteria – to ensure that child poverty is not increased.

EAPN supports the demand for the EU to develop an EU framework directive³ to implement the EU's commitment to guarantee adequate minimum income, above the poverty threshold, but with national levels developed according to different household needs using consensual budget standard or reference budget methodology, as highlighted in the Peer Review hosted by the Belgian Presidency in December 2010⁴. (See also EAPN and Irish national paper presented in the Peer Review highlighting the work of the Vincentian Partnership Foundation, which develops specific budgets for household types with different age children⁵). EAPN also highlights the backing given by the European Parliament, Committee of the Regions and European Economic and Social Committee in their opinions on the European Flagship Platform Against Poverty, for the Commission to take steps forward to scope such a Directive.

b) Supporting access to quality work

The majority of children living in poverty live in families with paid work⁶. Helping parents access paid work, can provide an important route out of poverty, but only if it is quality employment, that provides sufficient income, offers adequate working rights and conditions and does not increase the stress/reduce the health of the parents, undermining their capacity

² EAPN: (2011): Is the European project moving backwards: The social impact of the crisis and the recovery policies in 2010.

³ EAPN (2010) Working paper on Framework Directive on adequate minimum income.

⁴ EC: Peer Review: Using reference budgets to draw up the requirements of an adequate minimum income (26.11.10), Belgium. <http://www.peer-review-social-inclusion.eu/peer-reviews/2010/using-reference-budgets-for-drawing-up-the-requirements-of-a-minimum-income-scheme-and-assessing-adequacy>

⁵ Vincentian Partnership for Social Justice – household budget standards see:www.vpsj.ie and <http://www.budgeting.ie/>

⁶ OECD Report: What works best in reducing Child Poverty/OECD social, employment and migration papers 51 (2006).

to provide a caring environment for their children. Work must provide a way out of poverty, not only through in-work subsidies and tax credits but through the payment of a decent living wage which can provide sufficient income to provide for a family. This will ensure the independence of the poorest households and provide the best incentives to take up work. A quality job⁷ also needs to provide security, employment protection, adequate health and safety and other working conditions as well as work/life balance. Care must be taken to ensure positive transitions between periods on income support and paid employment, tackling poverty traps, paying attention particularly to the loss of key free services (education, health, transport, childcare etc). A positive, integrated active inclusion approach (implementing the three pillars of adequate income support, access to inclusive labour market and access to services) should provide the main basis.

c) Ensuring reconciliation of work and family life ensuring opportunity for personal care of children/ Whilst all parents should be given full support to access and take up quality jobs, the focus on obliging parents to take up full-time work, particularly single parents, without regard to the availability/adequacy or affordability of support systems or care services available, the quality of the job, nor specific family circumstances – particularly for more vulnerable families, runs the danger of jeopardising the well-being of the child, as well as deprivation and social exclusion of the parents. Input from members in EAPN 2011 crisis report highlighted such problems:

“The introduction of compulsory engagement with the labour market, despite little delivery in terms of childcare, sufficient training and education, or employment opportunities creates strong difficulties for lone parents. From 2008 to 2009, material deprivation for lone parents increased by over 20% (EAPN Ireland)”⁸

A continual theme from EAPN meetings of people experiencing poverty⁹ has come from parents keen to continue to care for their own children in a positive manner, rather than being forced to take up full-time low quality, low-paid often with shift work or long hours which exclude them from opportunities for direct care. A positive approach must be built, to give adequate support measures to enable low-income parents as well as others to positively combine work and family life, for the well-being of the child and the family.

An essential element to quality work principles includes support for universally accessible paid leave arrangements, including covering leave when children are sick and flexible working arrangements for parents that will help them balance family and their working lives. Quality part-time work, when not enforced, particularly for periods when children are young, should be supported as a sustainable option. This is often not the case for the majority of parents living on low incomes. Measures should ensure that all jobs, regardless

⁷ EAPN is currently finalizing 10 principles on quality work, as part of an EAPN explainer on Quality Work due to be published in 2012/ See www.eapn.eu and contact Amana Ferro: Amana.ferro@eapn.eu

⁸ EAPN (2011): Is the European project moving backwards? The social impact of the crisis and recovery policies in 2010 p. 13.

⁹ See reports from Annual People Experiencing Poverty meetings: www.eapn.eu

of their salary/contractual basis, including temporary and part-time jobs enjoy equivalent conditions.

2) Access to quality services.

Families need access to services that will ensure an adequate living standard for family life, with specific services to ensure equal opportunities for children and for the parents. This means ensuring access to affordable, quality social services: housing, health, social services but also education and training, particularly childcare, early-learning and measures to address school drop but also educational support for the parents. However it is also crucial to ensure access to other key public Services of General Interest: particularly transport (access to good, accessible and affordable transport services to enable access to work/shopping/child services etc) and energy/fuel (ensuring that parents do not suffer from fuel poverty and are able to afford to heat their homes to an adequate standard). Key public services need to be universal to ensure take-up and shared responsibility and benefit, which underpin support for the welfare state, but with targeted support for specific groups of children and families with particular difficulties (eg migrant, ethnic minorities, single parents, families with disabilities etc, to overcome the many obstacles to providing a positive, healthy and poverty-free family environment. Non discrimination needs to be actively mainstreamed into all policies.

Action to reduce energy poverty

In the EU, although comparable data is not available, it is thought that between 50 and 125 million people are suffering from fuel poverty. In the UK, for instance it is now calculated that 1 in 4 are in fuel poverty following the steep increase of energy bills and stagnation of household incomes (4.1 million people). Families with children suffer above average impact, together with older people, and people with ill-health and disabilities. (Wright 2002, Buzar 2007, Boardman 2010). The third Energy Package adopted in June 2009 gave Member States a clear responsibility to reduce energy poverty by setting up National Energy Action Plans containing measures to combat energy poverty, however currently these are not being implanted. EAPN together with other actors like Cecodhas, BEUC have highlighted that successful strategies need to embrace 3 factors (low household income, high and rising costs of fuel and high consumption due to energy efficiency¹⁰). The European Platform against Poverty, and more recently the Annual Growth Survey 2012 – has highlighted the need to prioritize this area, which could have such a significant impact on the disposable incomes, well-being and health of families.

Access to affordable housing/prevention and support to homeless families/children

Access to adequate housing should be seen as a pre-requisite for parents to exercise their fundamental rights and those of their children. Getting a secure, affordable and quality home environment is crucial for a decent life, providing an adequate home environment for children, as well as enabling full participation in society and in the labour market. Before the crisis, the rapid rise of housing costs were already squeezing family disposable income. According to Eurostat, in 2009, 12.1% of EU27 lived in households spending 40% or their disposable income on housing costs. This likelihood is much higher for households in rented

¹⁰ EAPN (2011): Active Inclusion – Making it happen. P. 37.

accommodation. The decline and residualization of social housing in nearly all Member States, combined with reductions in rent regulation and control on the private rented sector are a major factor affecting the affordability of housing for families. Support should be given to measures which increase the supply of affordable rented housing for low income families, particularly through social housing.

EAPN would further support FEANTSA's concerns to prevent homelessness and to ensure adequate support based on housing first models for families at risk ie avoiding prolonged stays in shelter or other forms of temporary housing, avoiding evictions, avoiding separation of children and parents in case of social emergencies/homelessness as well as finding appropriate solutions for runaways who do not reach the age to sign a tenancy agreement.

Child-centred early education, play and support to parental care

Whilst there are clear benefits to high quality, affordable early childhood education and care as outlined by the EC in the recent recommendation, for both parents and children, it should not be invoked as only a spur to employment, but as a social right committed to improving children's welfare and well-being. Child-centred early childhood care should be accessible, affordable and of good quality and should work to support parents to provide a positive, caring environment for their children, rather than seeking to replace or undermine personal family care. Investing in family support is crucial to promoting child well-being and tackling child poverty. EAPN members also highlight the key role of play, particularly free, child-led play and supporting parent's learning and participation in collaborative play activities, as a way of strengthening family ties, supporting child development and well-being. In our recent NRP report members highlighted also the importance of resourcing/supporting children's leisure activities, and hobbies, particularly subsidised holiday activities supporting families with children.¹¹

Educational opportunities - promoting child and adult welfare and rooted in lifelong learning support

EAPN members in our recent report on the NRPs¹² highlighted that often the underlying poverty and social exclusion dimension is not taken into accounting when defining causes and proposing solutions for school drop-out, nor attention paid to the need for a general reform of the education systems to reduce the inequality gap for rich and poor. Often the policies seem more concerned with reducing the number of children counted as early-school leavers. Addressing school drop out requires personalised, holistic approaches both within the formal educational system, prioritising alternative teaching models, and individualised support mechanisms and early warning systems, (eg no child left behind approaches as in Finland), but also in the informal and non-formal sector. This means adequate coordination between schools, child protection and other community services, as well as with the children/young people themselves and their families. EAPN members are also of the view that stronger financial incentives to keep young people in school, or to continue with further training could be important, recognizing the pressures on low income families to supplement

¹¹ EAPN (2011): Deliver Inclusive Growth – p.28

¹² EAPN (2011): Deliver Inclusive Growth – Put the heart back in Europe!: EAPN analysis of the 2011 NRP , Europe 2020. (see www.eapn.eu)

income with youth employment, as well as a stronger, more visible commitment by Governments to lifelong learning for all children and adults focused on personal and social development, rather than education only as a means to employment. There needs to be a stronger focus on fighting discrimination and ensuring equal access and treatment in education, in school and beyond, particularly for migrant and ethnic minority children, including Roma, and investing in integrated approaches to support disadvantaged areas.

3) Ensuring the participation of children and young people.

EAPN strongly supports Eurochild's view that participation needs to be supported from both the angle of participation in decision-making processes that affect them and in relevant policy processes, as well as empowering children through participation in social, recreational, cultural, sporting and civic activities.

Participation needs to start from the base of activating children's rights – the right to have a say over what affects them. This should be seen as part of an integrated human rights approach where the rights of all family and household members are listened to and respected. For EAPN, it is crucial that children are engaged both as users of specific services on an individual level, being consulted about plans that affect them (ie in child support services), as well as a collective - representing and voicing children's concerns, needs and opinions in policy decision-making processes. It is essential to ask parents and children in poverty what they want and what works, at every stage of the policy-making process (design, implementation and evaluation.)

Eurochild has highlighted many concrete examples of participation, particularly in the policy-making processes, with children and young people.¹³ EAPN has increasingly supported the participation of young people in the Annual meetings of people experiencing poverty supported by the Commission and the Presidency, and many members have gained significant experience in developing creative and effective methods for engaging young people in poverty as well as older people in the policy making arena at national level.¹⁴ The starting point needs to be the desire to listen and to learn from children, and their families.

The Flagship Platform against Poverty is planning to develop guidelines for stakeholder involvement. The Guidelines should establish how to embed participation in the Europe 2020 process, the Flagship Platform and Social OMC, supporting regular structured dialogue at national as well as EU level with stakeholders, including children and young people in poverty. To be effective, it is clear that the guidelines should be developed together with stakeholders, as recommended by the workshop on increasing stakeholder involvement at the Annual Convention in Warsaw. The mechanisms of the Social OMC should also be further used to promote mutual learning (peer reviews, studies and conferences) on effective methods of participation, results and impact, as well as indicators and regular monitoring of progress, in the Social Reports and the NRP.

¹³ Eurochild (2010): Valuing Children's potential – How children's participation contributes to fighting poverty and social exclusion.

¹⁴ EAPN (2009) Small Steps, Big Changes

Other key concerns

- **Tackling the causes of child poverty, not just the symptoms**

There is an increasing tendency to ‘blame the parents’, and root the causes of the transmission of poverty in so-called dysfunctional family practice, displacing a discussion on the structural causes of poverty. Significant reductions in child (and adult poverty), cannot be made without tackling inequality in income and wealth, as well as access to goods, resources and services, and committing to policies of better distribution and redistribution. The latest OECD report¹⁵, highlights the increasing income inequality gap in almost all OECD countries, and calls for urgent action. This is echoed in the EC new analysis of employment and social developments in Europe (ESDE)¹⁶. Any serious attempts to tackle child poverty therefore need to look at the mix of public policy necessary to reduce income inequality for families and effectiveness of re-distribution mechanisms, -particularly tax/benefits and in-kind benefits. *“Evidence shows that the level of poverty and inequality depend on public policies, redistribution characteristics of the welfare state and the scope of transfers and taxes”*¹⁷.

- **Keeping families together and supporting families to provide a better life for their children**

Greater emphasis needs to be given to stronger preventative action by social services to support families who choose to stay together, rather than sanctioning families in poverty by taking the child into care and out of the family, when other solutions exist. The needs of the child should remain paramount. The Recommendation should include a clear commitment to de-institutionalising children and carrying out the necessary prevention and support to vulnerable families.

Unaccompanied minors, street children, child labour and trafficking are highlighted by EAPN members as growing problems, Policies need to be developed to support migrant families coping with pressures of economic immigration, while promoting active measures to combat organized crime.

- **Pro-active measures to tackle inequality/discrimination of specific groups – families and children**

Deliberate exclusion of children/families from specific groups from accessing benefits or services (for example migrants (Ireland and Denmark), asylum seekers (UK), minority ethnic groups including Roma, will counteract other policies aiming at reducing child poverty, as well as being an infringement of human rights. Pro-active measures should be taken to prevent discrimination, and monitor implementation with adequate systems of redress. Within the commitment to universal services, specific tailored measures should respond to the needs of different groups of children and families (eg single

¹⁵ OECD (2011): Divided we stand.

¹⁶ EC (Dec 2011): Employment and Social Developments in Europe,

¹⁷ ESDE (2011) IBID.

parents, migrant, ethnic minorities – including Roma, parent's and children with disabilities..)

2) Do you have suggestions on mechanisms that could be put in place to implement and monitor the Recommendation (in particular in the context of Europe 2020 and the Social OMC)?

The implementation of the Child Poverty Recommendation depends on the establishment of a clear road map which would ensure the:

- collection of good data with robust indicators,
- the establishment of specific sub-targets to reduce child poverty within effective overarching target to reduce poverty and social exclusion of all groups.
- specific encouragement to Member States to develop integrated, holistic strategies to tackle child poverty and promote child well being based on the agreed principles. These should include key elements like: political leadership and commitment, diagnosis of causes as well as symptoms including growing inequalities, commitment to children's and parents' rights, strategic approach with clear objectives and targets incorporating an integrated three pillar approach, ensuring effective delivery, monitoring and evaluation involving stakeholders including children and families experiencing poverty.
- provide the support of EU and national budgets to deliver: including specific guidelines on the use of Structural Funds to support social inclusion of children – including through increase in affordable/quality services eg childcare/early learning and family support, and support for parents to access quality work and training through integrated active inclusion approaches.
- with transparent design, monitoring and evaluation together with national stakeholders, including children and families experiencing poverty, through the Social OMC/Social Reports and the NRP.

Key role of the Social OMC and Social Report

It is clear that the continued development of new indicators on child poverty and well being, as well as detailed monitoring and evaluation, and consolidation of mutual learning, needs to be carried out through the Social OMC. The ISG should continue to play a key role in the development of new/more effective indicators. These should be monitored through specific sections of the Social Report which can chart Member States progress, as well as on the key principles agreed in the Recommendation. The involvement of stakeholders including families and children/young people in poverty in this review is crucial. These assessments can then be used to underpin/ feed into the NRP and rest of Europe 2020 process. The Social OMC should also be fully mobilized to support mutual learning on impact to reinforce the Recommendations with Peer Reviews, Studies and Thematic conferences/seminars to raise visibility and ownership. Greater visibility needs to be given to the data, impact and results at EU and national level. Stakeholder involvement can be a great driver of this visibility and ownership.

Europe 2020 Targets and NRP process

The agreement of the EU poverty target – to reduce poverty and social exclusion by 20 million by 2020 is, in principle, a major step forward in the fight against poverty. As child poverty continues to increase at a greater rate than other groups, it would be important to establish a sub-target for child poverty, within the overarching poverty and social exclusion target. However, given that currently there is a shortfall of around 8 million in the general poverty targets set by Member States, with the Commission remarking the lack of comparability of indicators used, the first priority must be to increase the viability and credibility of the current overarching poverty target – through a common % reduction in the three agreed indicators (at risk of poverty, severe material deprivation and low work intensity). A target agreeing a common % reduction on child poverty for all MS would then be a viable option.

Additional to sub-targets, it would be important to ensure the the Joint Assessment Frame (JAF) which is used as the basis to assess the NRPs, included the new indicators developed to chart child poverty and well-being, and which could then form the basis of country-specific recommendations in the Commission’s June assessment of the NRPs.

ANNEX List of relevant policy documents

European Commission (2008), *Commission Staff Working Document, Joint Report on Social Protection and Social Inclusion*, ec.europa.eu/social/BlobServlet?docId=2386&langId=en

Social Protection Committee (2008), [Child Poverty and Well-Being in the EU: Current status and way forward](#),

[Who cares? Roadmap for a Recommendation to fight child Poverty](#) – Report on Belgian presidency conference, September 2010 (see in particular policy suggestions p. 56-62 and Trio Declaration)

[Call for an EU recommendation on child poverty and well being](#), background paper for the Belgian presidency conference, September 2010

TARKI (2010), [Child Poverty and Child Well-Being in the European Union](#), Report prepared for the European Commission, Budapest

[Policy Solutions for Fostering Inclusive Labour Market and for Combating Child Poverty and Social Exclusion](#), paper coordinated by the Network Core Team of the EU Network of Independent Experts on Social Inclusion for the related SPC peer review, 2011

TÁRKI (2011), [Child well-being in the European Union – Better monitoring instruments for better policies](#), Report prepared for the State Secretariat for Social Inclusion of the Ministry of Public Administration and Justice, Budapest

Council Conclusion "[Tackling child poverty and promoting child well being](#)", EPSCO Council, 17 June 2011

Annual Convention of the European Platform against Poverty and Social Exclusion (Report from Workshop 1 *Breaking the cycle of poverty through integrated family and child-centred policies*, report to be published)