

REPORT

Deliver Inclusive Growth – Put the heart back in Europe!

EAPN analysis of the 2011 National Reform Programmes, Europe 2020

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Contents

Executive Summary: Key Messages and Recommendations	6
Introduction	11
1. Inclusive growth and macro-economic policy	13
2. Progress towards meeting the poverty target.....	21
3. Progress towards Inclusive Labour Markets	33
4. Inclusive Education and Training Policy.....	43
5. Mainstreaming Gender and Discrimination	49
6. Using Structural Funds for Social Inclusion.....	55
7. Embedding meaningful stakeholder participation	65
ANNEX 1: EAPN Checklist /Scoreboard	72
ANNEX 2: Table of EAPN Scoreboard Results	74

Executive Summary: Key Messages and Recommendations

2011 marks the first operational year of the new Europe 2020 Strategy, committed to delivering inclusive, as well as smart and sustainable growth. For the first time a European Target has been set to reduce poverty, which together with other social targets on employment, education and training are meant to ensure a balanced economic and social approach. The strategy is delivered through the European Semester and at national level with the National Reform Programmes (NRPs). However, these developments have taken place in the context of a deepening crisis, as European Governments struggle to save the Euro, and enforce fast deficit reductions through social cuts, as part of the new economic governance package. What chance has such an approach to deliver on the poverty reduction commitments and promote social cohesion?

From May to September 2011, EAPN carried out a survey with its national and European members of this first year of the strategy – evaluating specifically the first NRPs and national targets. We present in this report a first assessment. EAPN members were asked to assess how far the NRPs contribute to promoting inclusive growth and the effectiveness of the policies proposed to achieve the poverty target, according to a scoreboard checklist. The specific contribution was evaluated (macroeconomic, employment, social inclusion, education and training), as well as the role of Structural Funds and governance mechanisms.

The overwhelming message from the survey is one of disappointment, a feeling of having been deceived, and widespread anger with the approach generally being taken at EU and national levels. The majority of members deplored the failure to set adequate poverty targets, and most considered the policy responses to ensuring inclusive growth at best inadequate, and at worst guilty of generating increasing poverty and social exclusion, and an attack on human rights. The failure to effectively engage civil society, people experiencing poverty and their organisations in the development of the NRP only underlined the alienation felt from the NRP process, and the feeling the EU was not working in their interests. The implications of this rejection have serious consequences for the future of the EU. If Europe has no heart – why should people back more EU?

KEY MESSAGES

- 1. The macro-economic approach, driven by EU economic governance and focusing on stability and competitiveness, is not promoting inclusive growth, threatens human rights, and is likely to generate increased poverty, exclusion and inequality in the EU.** The impact of austerity measures on social benefits and services, the failure to reduce deficits with other means including increased, fairer taxation is meaning that the “poor” are paying an unfair burden for a crisis they did not cause, whilst increasing inequality is jeopardizing social cohesion and a sustainable response to the crisis. This is undermining the credibility and future of the EU.
- 2. The failure to reach the EU poverty target and the evidence of cherry-picking and gaming by some Member States reflects a lack of seriousness about poverty reduction and is unacceptable.** The Commission has highlighted the impossibility of comparing the data drawn from the wide range of indicators used by Member States. The poverty target must be treated on an equal basis with the other targets and implemented.
- 3. The policies proposed to combat poverty, are skimpy, inadequately detailed and overly focused on employment, instead of investing in comprehensive, multidimensional rights'-based approaches, backed by strong social protection systems.** The policies appear to be geared to the objectives of the Annual Growth Survey and Euro Plus Pact, rather than to the integrated guidelines for promoting social inclusion (Guideline 10). Although some agenda-setting is highlighted for key priority groups (particularly children, youth, older people,

homeless) there is little concrete follow-up or implementation of integrated strategic approaches.

4. **Whilst the Employment target is seen as sufficiently ambitious, severe doubts are voiced about its implementation, the lack of synergies with the poverty target and the failure to prioritise inclusive labour markets.** The overall focus is on pushing people towards jobs that don't exist by hardening activation and increasing sanctions, rather than focusing on quality job creation, investing in social economy and other demand-side measures, providing pathways for excluded groups.
5. **Education is not being treated as an investment! The education target on school drop out highlights large disparities, with few concessions to countries' starting points.** The policies proposed are largely symptomatic, failing to analyse the causes linked to poverty and social exclusion, with a tendency to focus on reducing numbers reported as school drop-outs. Insufficient attention is given to integrated lifelong learning approaches, which work comprehensively with the young people, communities and families in formal and informal settings.
6. **Gender Equality and the fight against discrimination is largely absent, despite explicit commitments made in Europe 2020 – i.e. to migrants and Roma Inclusion.** There is a significant lack of an integrated rights-based approach, investing in rights to universal services, with targeted solutions to overcome obstacles for specific groups. Where gender equality is highlighted it is primarily as labour-market integration, with increases in childcare and attention to measures to reduce the gender-pay gap, but little attention to quality of services, work/life balance. Active ageing is primarily focused on raising retirement ages, with little concern for the social and health impact, or pro-active measures to support older people in work or to ensure decent pensions and adequate income to support dignified ageing.
7. **Structural Funds are falling far short of their potential to deliver on social inclusion, with a greater focus on growth-enhancing infrastructure, and an unequal balance between employment, training and poverty targets.** An integrated strategic approach to reduce poverty and social exclusion and to embed a more social-friendly approach through the funds is largely missing - embedding an integrated active inclusion strategy and ensuring more accessible financing and access for smaller NGOs.
8. **A step backward for national stakeholder engagement from the Social OMC,¹ but limited progress on the old Lisbon NRP process!** Insufficient and low-quality participation of anti-poverty NGOs and people experiencing poverty is evident, despite the strong interest demonstrated by national networks. Contact is limited to information meetings and low-level consultation, with minimal impact and no visible engagement of regional and local levels. The process continues to be dominated by economic and financial ministries over social, with consultation limited mainly to the poverty sections, despite the need to engage all policies in combating poverty.

¹ The Social OMC refers to the Open Method of Coordination (OMC) on social protection and social inclusion which is the mechanism for coordinating social policy across the EU.

KEY RECOMMENDATIONS: PUT THE HEART BACK IN EUROPE!

- 1. Restore priority to a balanced economic and social approach, mainstreaming inclusive growth throughout all policies in the NRP (macroeconomic, employment, social).**
 - Carry out an urgent independent social impact assessment of the crisis measures, including short and long-term social and economic costs of austerity measures, economic governance and Euro Plus Pact. Transparently debate results in the EP and European Council.
 - Mainstream inclusive growth objectives explicitly throughout Europe 2020 and the economic semester, including in the Annual Growth Survey, and all sections of the NRPs. The Country-Specific Recommendations should consistently evaluate performance on all 5 priorities/targets including the poverty reduction target, including for countries receiving Commission and European Central Bank support measures (Ireland, Greece, Portugal, Latvia and Romania).
 - Promote a fairer, more inclusive response to the crisis with a fairer sharing of the burden – slower deficit reduction, social investment to promote quality job creation, red-lining social protection and key services, and increasing revenue through fairer taxation.
 - Go beyond a focus on growth and GDP and invest in a pro-social and pro-developmental approach with equality at its heart – promoting fairer distribution, and guaranteeing access to rights, resources and services as a sustainable basis for inclusive growth.
- 2. Re-establish a credible EU poverty target, with a % reduction on all 3 indicators, specific sub-targets on agreed priority groups, and linked to full set of Social OMC indicators.**
 - Give the poverty target equal treatment to the other targets, working towards a common % reduction on all 3 indicators which can permit a fair sharing of the burden.
 - Set specific sub-targets on key priority groups at greater risk of poverty, for example children, older people, but also migrants and ethnic minorities, in the context of the full set of OMC indicators.
 - The target needs to be transparently monitored, with an annual debate in the European Council and European Parliament on progress, drawing on Conclusions from the Annual Convention.
- 3. Implement comprehensive and integrated approaches to tackle the multidimensionality of poverty, underpinned by participative OMC National Strategies on Social Protection and Social Inclusion.**
 - Embed participative national strategies on social protection and social inclusion based on the common objectives, to underpin the NRPs.
 - Establish a road map for implementing integrated active inclusion approaches (adequate minimum income, access to quality jobs and services), as a fair response to the crisis and effective means of poverty reduction.
 - Implement concrete follow up on thematic priorities: the 3-pillar approach backed by the June EPSCO Council in the Recommendation on Child Poverty and well-being (access to adequate family income, services and children's rights and participation), and implement the EP's call for a European Homeless Strategy.
 - Urgently defend and invest in social protection and adequate minimum incomes schemes. Implement the EP recommendation to progress on an EU framework on adequate minimum income.
- 4. Invest in inclusive labour markets and quality jobs, as part of integrated active inclusion approaches.**
 - Support positive activation, providing personalized support through counselling, education and training, childcare services.
 - Invest in inclusive job creation, particularly in social economy, green jobs as well as the service sector.

- Promote quality, both in newly-created jobs as well as existing ones - ensuring living wages, job security and protection of employment rights. Ensure targeted strategies reduce and prevent in-work poverty.
- 5. Invest in education for all, through inclusive education and lifelong learning strategies that combat segregation and exclusion.**
- Carry out a comprehensive assessment of underlying social realities, including poverty and social exclusion which lead to drop-out and poor educational attainment.
 - Break intergenerational exclusion and tackle explicit exclusion of all groups, providing tailored, wrap-around support.
 - Promote inclusive education and lifelong learning approaches, through policies combating segregation and exclusion in education and training and promoting an integrated support to life-long learning, through the life cycle, through formal, informal and non-formal systems.
- 6. Invest in inclusive societies and combat discrimination on all grounds and in all areas.**
- Back equal opportunities to universal services and create effective pathways to integration and inclusion for migrants and ethnic minorities, including Roma, that ensure access to rights, resources and services.
 - Support a rights-based approach to gender equality carrying out a detailed gender impact analysis, and prioritizing policies reducing care needs, the glass ceiling and job segregation, as well as the pay-gap. Pay specific attention to the needs of women on low income, or suffering multiple exclusion.
 - Provide for a dignified ageing and increased opportunities for youth, supported by guaranteed universal services and targeted resourced strategies for each group.
- 7. Ensure Structural Funds effectively promote inclusion, through a social-friendly approach.**
- Back the Commission proposal to target 20% of ESF for social inclusion and establish clear Commission guidelines on how Structural Funds should deliver on the poverty reduction target through integrated and socially inclusive approaches, (particularly through integrated active inclusion) for ESF, ERDF and other Cohesion funds, making them accessible for small grass-roots NGOs.
 - Set up an effective evaluation system designed to assess the extent to which Structural Funds will have delivered on the poverty target.
 - Urge Managing Authorities to provide higher transparency on the use of Structural Funds at national level.
- 8. Embed meaningful stakeholder participation (including anti-poverty NGOs and people experiencing poverty) at all stages and areas of the NRP.**
- Ensure meaningful engagement of people experiencing poverty and their NGOs, and other stakeholders, at all stages of the NRP process (design, implementation and evaluation) and in all areas (macro-economic, employment and social), as well as in the National Strategies for Social Protection and Social Inclusion that should underpin the NRP.
 - Develop and implement obligatory guidelines for participation of stakeholders, drawing on good practice in the Social OMC and effective methodologies to ensure partnership and co-development.
 - Provide resources and support to develop national anti-poverty platforms and broader forums to provide a basis for regular structured dialogue with national, regional and local stakeholders in Europe 2020 (the Social OMC and Flagship Platforms), providing financing for the engagement of excluded groups including awareness-raising/capacity building through PROGRESS.

Introduction

2010 was a significant year. Not only did it mark the EU year for combating poverty and social exclusion, but it was also the year that Europe 2020 replaced the Lisbon Strategy for Growth and Jobs. The new Europe 2020 strategy appeared to offer an important step forward for the fight against poverty and the chance of a positive legacy from the EU year 2010. However, 2010 was also the year when the crisis and the austerity measures bit deep, impacting worse on people experiencing poverty. This has shaken the confidence and trust of anti-poverty organisations working with people in poverty and undermined their belief in the positive role that the EU can play. Can Europe 2020 deliver on its promises, provide a fair solution to the crisis and ensure a positive social legacy from 2010?

The new Europe 2020 strategy promised progress, rejecting a growth and jobs alone approach, that had failed to reduce poverty in the boom years (2000-2008) through a new strategy for smart, sustainable and **inclusive growth**. For the first time, the EU committed itself to a tangible target to reduce poverty by at least 20 million by 2020², through a set of 3 overlapping indicators, as well as 2 other 'social targets': to increase the employment rate to 75% and to reduce school drop out to 10%.

A new Flagship Initiative, *The European Platform Against Poverty and Social Exclusion*, was also established to drive better coordination with economic and employment policies and deliver concrete results for the fight against poverty, backed by a reinforced Social OMC.³ Two other Flagship Initiatives could also be of particular relevance: the *Agenda for New Skills and Jobs* and *Youth on the Move*. The EU targets are to be delivered at national level through National Reform Programmes (NRPs), based on new, reduced Integrated Guidelines, with a specific new Guideline (Guideline 10) to promote social inclusion and combat poverty, combined with Guidelines 7, 8 and 9⁴ to support the social dimension.

The NRPs are expected to drive the delivery on the poverty and other targets at national level: establishing national targets, setting out policies to achieve the objectives and assigning adequate funding, based on the Integrated Guidelines. However, the visibility, accountability and effectiveness of the strategy depends to a large degree on the ownership and quality of participation by relevant stakeholders at the EU, national, regional and local levels, including NGOs and people directly experiencing poverty. Whilst the Integrated Guidelines clearly support an active partnership principle in the development of the NRPs⁵ (involving all relevant stakeholders, including social partners, regional and local authorities and civil society organisations in the design, implementation and monitoring of the NRPs), implementation has been weak so far. How can Europe 2020 ensure a buy in at the national, regional and local level and convince citizens that the strategy is worth it?

Europe 2020, however, does not stand alone. It is delivered through the new 6 month EU economic semester: a new EU framework coordinating economic governance and macroeconomic surveillance

² The target aims to reduce the number of people who are at risk of poverty and social exclusion, according to three indicators: at risk of poverty, severe material deprivation and low work intensity.

³ The Social OMC refers to the Open Method of Coordination (OMC) on social protection and social inclusion which is the mechanism for coordinating social policy across the EU.

⁴ EC (2010) Employment Guideline 7: Increasing labour market participation and reducing structural unemployment. Guideline 8: Developing a skilled labour force responding to labour market needs, promoting job quality and lifelong learning; Guideline 9: Improving the performance of education and training systems at all levels and increasing participation in tertiary education.

⁵ European Council (2010) Recital 16, Employment Guidelines (October 2010).

launched each January with the Annual Growth Survey. In reality, the economic governance objectives and cycle is the dominant policy driver, putting the overall objectives of Europe 2020 on the back-burner. (For example on the Europe 2020 website it describes how *“the monitoring of the strategy is integrated into the “European semester”, an annual cycle of economic and fiscal policy coordination”*, rather than describing the semester as an instrument of Europe 2020).⁶

The current EU agenda is driven by the need to find an effective response to the crisis - particularly the sovereign debt crisis, and the threat to the stability of the Euro. The main policies are focused on stabilizing the Euro, insisting on rapid public debt- and deficit reductions, primarily through social expenditure cuts. Competitiveness is to be increased by reducing macro-economic imbalances, mainly through reducing unit labour costs and raising retirement ages, consolidated in the Euro Plus Pact and the “six pack” of legislative instruments agreed, in principle by the Council this July and recently backed by the European Parliament⁷. In this context, inclusive growth and the commitment to poverty reduction seem increasingly marginalized. How far can Europe 2020 succeed in mainstreaming inclusive growth? What does it mean in practice to deliver balanced growth? What needs to happen to make this a reality?

This report makes a first assessment of how far the new NRPs mark progress towards inclusive growth and contribute to meeting the new poverty and other social targets, in EAPN members' view. It has been prepared through a survey questionnaire and a scoreboard mechanism, whereby EAPN member networks and European organisations assessed policies proposed in the NRPs. The contribution of **ALL** policy fields to the achievement of the poverty target and promotion of inclusive growth are assessed (macroeconomic, employment, education and training and social inclusion policy), as well as the adequacy of funding (particularly Structural Funds) and the effectiveness of the participation and partnership. The scoreboard mechanism is not intended as a verdict on the current situation at national level regarding poverty and social exclusion, but more an assessment on how effective the policy responses in the NRP are deemed to be by EAPN Members⁸. It should be noted that the survey was carried out in May 2011, when members were more optimistic about the possibility of imminent recovery. If the survey had been carried out now, the assessments are likely to have been a lot more negative.

Responses were received from 22 EAPN networks (Austria, Belgium, Bulgaria, Czech Republic, Denmark, Estonia, France, Germany, Ireland, Italy, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Spain, Slovakia, Slovenia, Sweden, UK) and 5 European Organisations (ENAR, Eurodiaconia, Eurochild, FEANTSA and PICUM). The input has been discussed in 3 EAPN working group meetings at the end of May 2011 (Social Inclusion, Employment and Structural Funds Working Groups). The report has been drafted by the EAPN Secretariat (Sian Jones, Amana Ferro and Vincent Caron) with the support of the EAPN Working Groups.

⁶ Europe 2020 Website: http://ec.europa.eu/europe2020/tools/monitoring/index_en.htm.

⁷ The EP approved the Council's 6-pack [Economic governance package on the 28 September 2011](#).

⁸ In some cases, this may mean that members give a high rating to NRPs even when the current situation is very difficult, because they value highly the proposals for action in the NRP (e.g. Spain). Scoring will also reflect the perceptions of the particular network concerned. Perhaps even more than comparing scoring between different countries, what will be interesting will be to notice changes in the scoring of the same country over time.

1. Inclusive growth and macro-economic policy

Europe 2020 Integrated Guidelines

- 1: Ensuring the quality and sustainability of public finances
- 2: Addressing macro-economic imbalances
- 3: Reducing the imbalances in the euro area

Social inclusion and poverty reduction cannot be solved by social policies alone. This is a major conclusion that can be drawn from the Commission's proposals on Europe 2020 and the European Flagship Platform against poverty: *.....providing solutions to these problems demands approaches that cut across all policy domains thus requiring the challenge of fighting poverty to be mainstreamed into all policy development. It demands a better coordination between macro and microeconomic policies...*⁹ In reality, this means introducing an integrated approach from the beginning, not as an after thought. It means ensuring that all policies contribute to the poverty reduction target: macro-economic as well as employment and social policies, and that a balanced approach to growth is sought. EAPN networks have assessed the delivery on these goals in the macro-economic sections based on a scoreboard.

1.1 Macro-economic policies - a step forwards or back for poverty?

EAPN Scoreboard

MACROECONOMIC	Score 1-10
1. How far do the Macro-economic policies support social inclusion ? i.e. <i>do they increase investment in social protection/services and quality job creation? Do they limit austerity cuts on benefits and services?</i>	3 out of 10

The majority of EAPN networks highlighted that the macro-economic policies proposed were unlikely to contribute to inclusive growth and the reduction of poverty and social exclusion. Most agreed that the policies themselves could contribute to generating more poverty (BG, CZ, DK, IE, IT, NL, PL, SE) with some (SK, ES, PT, EE) highlighting a low impact. A small number of networks considered that their NRPs¹⁰ could contribute (AT, BE, LT, MT) in some way towards inclusive growth.

1.1.1 Focus on stability and competitiveness, not inclusive growth

Most EAPN networks highlighted that inclusive growth was not a core priority for the NRPs' macro-economic policies. In some cases, members highlighted the NRPs' focus on safeguarding a surplus (SE) rather than a deficit. Others reported the dominance of the commitments to the Euro Plus Pact (NL, ES) and the Stability Programme update, or, in the cases of the bail-out countries, the agreed priorities of the EU/IMF Programme (IE). As a result, references to inclusive growth were almost completely absent, with many networks highlighting the failure to mainstream social goals or consider how macro-economic policies could contribute to the reduction of poverty and social exclusion (AT, DK, EE, IT, PL, PT, UK).

⁹ EC Communication (16th December 2010): *The European Platform Against Poverty and Social Exclusion: A European framework for social and territorial cohesion* (COM/2010/0758 final).

¹⁰ National Reform Programmes (NRPs) are prepared by national governments each year to demonstrate how national policies will deliver on the agreed targets and guidelines.

EAPN UK: “The macroeconomic policies being implemented by the UK Government are not designed to reduce poverty or inequality. They are designed to reduce the deficit - a key way of doing this is reducing not only the amount of social spending but its nature.”

1.1.2 Macro-economic policies that generate poverty

For many networks, it was clear that the proposed macro-economic policies are not only failing to **reduce poverty**, but are more likely to contribute to an **increase** (BG, CZ, DK, IE, IT, SK, PT, PL). For example, in the UK, estimates suggest that poverty will increase by up to 800.000 by 2014.¹¹ In some cases this is due to fewer people being lifted out of poverty, but more often the increase is due to the likely impact of austerity measures, prioritizing public expenditure cuts.

EAPN Ireland: The Irish NRP directly recognizes that recovery policies will generate more poverty: “It is envisaged that in the early years fewer people may be lifted out of poverty or indeed the numbers may increase due to the effects of economic recession and the implementation of the National Recovery Plan, in particular changes in the structure and operation of the social welfare system and child income support.” (Irish NRP 2011)

Most expenditure cuts appear to be primarily targeted at social services, income support and related benefits, and in some cases, rather surprisingly, active labour market policies (DE, PL, PT), with an inevitable negative impact on increasing access to decent employment and the prevention as well as the alleviation of poverty (AT, DE, IE, MT, NL, SE). Some networks highlight their Governments’ claim to implement fiscal consolidation by promoting “cheaper and smaller government without losing quality” (ES), or without undermining growth or damaging social cohesion (DE). However, often such claims disguise the harsh reality of savage cuts to benefits and services, neglecting to detail the full scope and impact of the cuts planned (IE, IT). In other cases, cuts are hidden by restricting access to social assistance and not indexing income eligibility thresholds (PL). In either case, most EAPN networks are clear that the likely result is an increase in poverty and social exclusion.

EAPN Germany “Despite the government claims to ensure that budget consolidation does not endanger growth potential and social balance, social benefits have been reduced the most, for example, the cancellation of parental benefit and of the old age pension insurance contributions for recipients of Unemployment benefit II (Hartz IV), the cancellation of the limited bonus for the transition from Unemployment Benefit I to 2. Furthermore the funds of the Federal Employment Agency for the integration of long-term unemployed persons into work have been severely cut for 2011 and the subsequent years. For the field of Unemployment Benefit (II) 6.6 billion was set for 2010 and only 5.3 billion for 2011. This corresponds to a cut of 19.7%.”

EAPN Italy: “Cuts in national social funding have been devastating: 2 billion 520 million in 2008 to approximately 350 million in 2011. The damage caused to those most in need of services and support will be – and is – incalculable....We do not believe the crisis is the only culprit. The government has a big responsibility – putting in place policies that undermine universality of rights and social cohesion.”

EAPN Poland: “The NRP announces several cuts in social protection and employment services including funeral benefits (by 30%), active labour market programmes (40% from 2010). The official reason is that some activation programmes are ineffective.What was not mentioned is the decision to *not* index social assistance income eligibility thresholds, now lower than the subsistence minimum (independently calculated by the Institute of Work and Social Affairs at 473 PLN a month). This decision is against the Tripartite Commission recommendation and

¹¹ Mike Brewer & Robert Joyce (Dec 2010): *Child and working age poverty, 2010-2013*, IFS Briefing Note 115.

disregards the social dialogue principle – not to mention other basic principles of civilized society.”

1.1.3 Reductions in wages and disposable income

The Euro Plus Pact commitments to reduce unit labour costs are strongly reflected in many NRPs, in the macroeconomic section. In most countries, members report that public sector wages and pensions have been targeted, but in the private sector, wages are also being reduced due to high unemployment (ES). In some cases, frozen wages are contributing to increasing inequality between wages in the private and public sector (PL). The reduction of benefits and downward pressure on wages result in reduced disposable income levels, not only for the poor. This would appear to undermine the capacity for sustainable growth, as the poor normally have little alternative but to spend their income on basic goods and services rather than to save, increasing domestic demand. The impact of rapidly rising inflation on basic goods on squeezed incomes, particularly food, housing and energy, has also not been sufficiently taken into account (ES, MT, PT, PL).

EAPN Poland: “Cuts in expenditure and impact on income are incompatible with the point that in time of crisis we need to spend more to protect the level of consumption.”

EAPN Malta: “Inflation is not taken into consideration – even though inflation is above the EU average and this has meant that real income has declined, which significantly affects lower income groups. In fact this has already translated into a higher proportion of people at risk of poverty. The rate after social transfers has increased from 13.7% in 2005 to 15.1% in 2009. The percentage of people who are in employment yet whose disposable income is below the risk of poverty threshold has also increased from 4.7% in 2005 to 6% in 2009.”

1.1.4 Weak investment in social protection and fair and sustainable pension reform

Few NRPs make reference to the key role of social protection systems as automatic stabilizers, and in preventing the crisis. The main focus is on containing health and social services expenditure (IT, MT), undermining in some cases the universality of services. A strong priority is given to the Euro Plus Pact’s requirements to improve the sustainability of pension systems. In most members’ view, this translates primarily into commitments to raise the retirement age, and to lower contributions, with concerns about the impact on future pensions. The issue of adequacy of pensions is given scant attention, nor are the risks of raising retirement ages, with few opportunities for people to stay longer in work, taken into account, particularly for people on lower incomes or in low skilled jobs. Some countries are opting for short-term solutions to reducing contributions, which risk undermining the long-term financing and sustainability of the pension systems (PL). EAPN Belgium is one of the few networks to underline a commitment in the NRP to ensuring adequacy and sustainability of pension provisions with the follow up of the Green Book on pensions.

EAPN Slovakia: “The NRP aims to increase redistributions within pensioners without the examination of the adequacy of pensions, and can be seen as an attempt to decrease meritocracy in pension and increase equality among pensioners. However, it is planned without considering adequacy.”

EAPN Italy: “Universal public health is undergoing a deep crisis due to drastic cuts including the closure of hospitals, leaving some regions without coverage, and the elimination of emergency beds. This is also due to mismanagement and corruption.”

EAPN Malta: “One of the issues under pension reform has led to the increase of pensionable age from the current 60/61 to 65 by 2026. This raises the problem of whether persons in all forms of jobs can actually continue to be productive beyond a certain age, and whether employers will keep them on.”

1.2 Missed opportunity to promote equality and fairer distribution

EAPN Scoreboard

MACROECONOMIC	Score 1-10
2. How far do the NRPs' macro-economic proposals promote greater equality , fairer distribution and redistribution of income and wealth? <i>i.e. do they reduce the gap on income, wages and taxes?</i>	2.3 out of 10

1.2.1 Increasing inequalities

EAPN networks also assessed how far Member States were contemplating a fairer sharing of the “pain” of the crisis. For EAPN, poverty cannot be solved without reducing inequality. Inequality is one of the key causes of the crisis, a key social determinant of health, and a major obstacle to sustainable and inclusive growth.¹² The majority of networks rated the NRP as low or very low in terms of promoting policies that promote greater equality, and predicted rises in inequality.

EAPN Malta: “It is very difficult to assess what impact macroeconomic policies are likely to have on poverty, social exclusion and inequality for two main reasons: such policies are primarily aimed to correct imbalances (such as a current account deficit and private and public debt) and hindrances to potential growth which may or may not trickle down to the weakest element in the society. Inequality is not mentioned although it increased from 0.269 in 2005 to 0.304 in 2008 in the Gini Coefficient so redistribution is not leading to a lowering of income inequality, but is increasing.”

1.2.2 Unfair burden of deficit reduction on the poor

Most EAPN Members highlighted the failure to prioritize a fairer sharing of the deficit reduction measures through *increasing revenue by fairer taxation*, and *fairer distribution* in wage and income levels to reduce the inequality gap in income and wealth (AT, BE, BG, CZ, DK, EE, IE, IT, LU, NL, PL, PT, ES, SK, SE, UK). Many EAPN responses consistently emphasized the **policy alternatives** to deficit reduction through cuts. In its 2011 report on the social impact of the crisis, EAPN proposed alternatives to ensure a more balanced and fairer recovery: reducing deficits more slowly, red-lining key social services and benefits, increasing revenue and promoting fairer redistribution (through more progressive tax systems).¹³

Key concerns were raised about the failure to take measures to increase revenues without sacrificing social spending, through fairer taxation systems (IT, DE). Specific measures to tackle tax evasion and avoidance, particularly in international tax havens were highlighted as an important priority (BE). Italy appears to be one of the few countries proposing action to strengthen the fight against big tax evaders, but doubts are raised about the implementation. Austria is also contemplating new bank and other taxes. But some EAPN responses missed proposals for increasing revenue through new taxes: for example Financial Transaction Tax (LU), but also taxes on wealth and ecological tax reform (AU). Fairer tax policies, it was argued, would not only increase revenue and the disposable income for the poor and those on middle incomes, but shift the burden of financing public services onto those with the greatest means - including more effective taxes on wealth (IE, AU).

¹² EAPN (2011), Background Paper: [Re-engaging Hope and Expectations – getting out of the crisis together](#).

¹³ EAPN (2011), [Is the European project moving backwards? The social impact of the crisis and the recovery policies in 2010](#).

The avoidance of a sole focus on VAT, is also seen as vital, as indirect taxes proportionately hit hardest the incomes of the poor (PL), particularly when they target essential food and services. The continuation of flat taxes in some of the poorest member states was strongly criticized, shifting the costs of public expenditure disproportionately onto the poor and away from the wealthy. Particular concern was raised where such unfair and regressive tax systems received explicit support from the IMF and European Commission as pre-conditions of the bail-out deals. (LV, BG, HU). A commitment to fairer tax systems is seen as an essential base for reducing inequality and driving progress towards inclusive growth.

EAPN Austria: “A new bank tax is proposed bringing 500 Mio a year and has been ear-marked for the field of long-term care, (however, it is not clear how strictly and seriously this will be taken), also a flight concession tax, and some positive steps on mineral oil... but both the introduction of taxes on wealth and an ecological tax reform are necessary.”

EAPN Bulgaria: “The combination of the low ceiling for the social insurance system (up to 1000 EURO) and the flat tax rate on incomes (10%) intensifies the already high inequalities – due to this fact the poorest country in the EU has one of the highest regressive scales of seized income.”

EAPN Ireland: “In Ireland, the tax system needs to be reformed to make it more equitable. Currently tax levels are below the EU average. Recent new taxes or other deductions from incomes have had a very negative impact on the incomes of the lowest paid. EAPN Ireland as a member of the Community Platform, is proposing a more equitable tax system which places a greater focus on taxing wealth and ensuring the wealthy pay a fairer, effective level of tax.”

EAPN Italy: “The Government is proposing new regulations (Decree Law: Development) that could contribute to the fight against poverty and social exclusion – tax incentives for recruitment in the South, conversion from floating to fixed rate mortgages for low income families, regulation of bonuses for Banks and freezing dividends... etc... but will it be implemented?”

EAPN Slovakia: “We need the re-introduction of progressive taxation, decrease of VAT, particularly on food, and the increase of state contributions for those insured by the states.”

1.3 Promoting comprehensive approaches, beyond employment

EAPN Scoreboard

MACROECONOMIC	Score 1-10
3. How far is there a strong recognition of the need to deliver social inclusion beyond employment and including through economic measures?	2.95 out of 10

1.3.1 Weak recognition of need for balanced approaches

The majority of responses rated low or very low the degree to which NRPs put forward a **balanced, comprehensive approach, balancing** macro-economic, employment and social inclusion policies. (AT, BG, CZ, DK, EE, IE, IT, LU, MT, NL, PL, PT, ES, SE, UK). The only countries where a more balanced approach is noted by members, is in Belgium and Lithuania.

The focus in most NRPs on **bottlenecks to economic growth** appeared to make little connection to the objectives of sustainable or inclusive growth or the need to overcome the specific obstacles to achieve these goals. Specific social bottlenecks were referenced only in Belgium and the UK, where inadequate investment in social protection systems and education are put forward as **social bottlenecks to growth**. Where policies to support inclusive growth are mentioned, these are almost entirely focused on raising employment rates, without regard to the quality of jobs on offer, ensuring access for all, or investment in social protection or integrated support with adequate income and quality services (Active Inclusion). For most members, this is an inadequate response to

the challenge of preventing and reducing poverty, exclusion and inequality. In the macro-economic section, there is a need to spell out what balanced sustainable and inclusive growth means, as part of a social and sustainable model requiring social investment in decent jobs, social protection and minimum income systems and public services, as well as encouraging fairer distribution.

EAPN UK: “At no point does the NRP even suggest what balanced growth means. Balanced appears to mean only a reduced role for the public sector. The only place where there appears to be a discussion of the “social’ bottlenecks is in relation to skills and education, but even here not of the skills and qualifications of those furthest from the labour market.”

EAPN Belgium: “In the Belgian NRP, Social Protection and Social Inclusion are developed as “bottlenecks to growth”. While we welcome this mention, particularly as it hasn’t been followed by other member states, we are concerned that the social commitments are only presented as bottlenecks to *growth alone*, which suggests already that the social pillar is of secondary importance to the economic.... We need a more balanced NRP. It should provide an integrated strategy which combines the economic, social and sustainable pillars but move towards the aim of increasing social standards, the well-being of the population, ensuring basic goods and services for all, and quality jobs, based on fundamental rights...”

1.3.2 Failure to embed a social floor as social investment

Few NRPs appear to be giving priority to alternative investment strategies as a road out of the crisis, which is a key priority for many EAPN networks (AT, BE, BG, DK, EE, PL, PT). Social spending should not be seen as a cost, but an essential tool to achieve sustainable and inclusive growth (IT). Key to this is investing in an adequate minimum income, which can provide a floor for consumption and a springboard for inclusion (BE, IT, BG, DK, IE, PT, PL, UK, IE). In Belgium, the NRP makes a strong case for investment in social protection systems, regarding the prevention and alleviation of poverty but also as an essential pre-requisite for sustainable growth. However, EAPN Belgium comments on the lack of concrete measures to make this reality – particularly measures to increase access to decent housing and affordable quality health services, although positive measures are proposed on energy poverty, if it can be ensured that they reach the most vulnerable.

EAPN Belgium: “The Belgian NRP supports the idea of social investment in social protection systems, *“the maintenance of a quality social protection system constitutes an essential part of effective socio-economic policy and in particular the fight against poverty”* (NRP BE), as also having a positive impact on growth. This can be seen where Belgium has registered 2, 1% growth in GDP in 2010, whilst continuing to invest heavily in social protection.”

EAPN Italy: “Social spending should no longer be perceived as a “ball and chain” but an essential tool to achieve sustainable levels of sustainable growth, social cohesion and social justice, laying the foundations for a country less marked by the gap between rich and poor. This is vital in Italy: rated as 5th amongst the 17 OECD countries with a marked inequality expansion from 1985-2008¹⁴...the establishment of a universal adequate minimum income scheme is essential.”

1.3.3 Missed opportunities for investment in social innovation, jobs and education

Additional concerns are the failure to prioritize investment in social and green jobs (AT) or to actively support social economy and social innovation (PT). The need to increase the social ambition on the R+D target is also highlighted (BG). (See Chapter 3 for more information).

EAPN Austria: “Priorities for expenditure have to be reviewed and a stronger focus given to green and social investments. EAPN Austria with other civil society actors presented an

¹⁴ OECD (2008): *Growing Unequal? Income distribution and poverty in the OECD countries*.

alternative budget, including raising income from ecological taxes and on wealth and making proposals for social and green investment, but these proposals are not reflected in the NRP.”

EAPN Portugal: “We’d like to see more support for social economy and social innovation open to NGOs, and investment in adequate income and social protection, particularly for elderly people, working poor and the unemployed, as well as investment in affordable services as part of an active inclusion approach.”

EAPN Bulgaria: “The macro-economic scenario does not include any innovative policies...the target for R&D should be much higher and clearly recognize the urgent need for investments and developing knowledge and different scenarios in the social field.”

1.3.4 Business as usual: the trickle down theory

For some networks (AT, BE, BG, IT, MT, PT), the failure to develop comprehensive policies for inclusive growth reflects the EU’s continuing support for a discredited economic model, focused exclusively on economic growth, without ensuring fair distribution of income, wealth and the benefits of growth. In the context of the current crisis, this model continues to promote the needs of the markets over people, insisting on deficit reductions focused on expenditure cuts, without an integrated approach to ensure a balanced and fair recovery with inclusive growth, based on a pro-social and pro-developmental model.

EAPN Italy: “A critical analysis is missing of the current model of development. The remedies they propose are always the same: economic growth and competitive markets.”

EAPN Bulgaria: “We consider that in the period 2000-2010 the original Lisbon Strategy was effectively turned into a neo-liberal and anti-social model. Now the Bulgarian NRP is strengthening this development, without even trying to pretend it is pro-social and pro-developmental. In the period November 2010 – April 2011, the NRP grew from 38 to 99 pages, but it just includes more and more pages on the Euro Plus and fiscal discipline, nothing new was included on social development.”

EAPN Malta: “In traditional economic theory, economic growth leads to more jobs and higher standard of living. But this needs to be accompanied by a fair distributive systems which ensure that all people have access to resources, i.e. education, health, employment possibilities, environment, land etc. Measures to increase economic growth can lead to an increase in well-being of society and its citizens... but not automatically.”

SUMMARY OF MAIN MESSAGES

1. The Macro-economic policies in the NRPs focus only on stability and competitiveness and are not actively promoting social inclusion nor inclusive growth. There is significant evidence that policies proposed are already generating poverty and social exclusion, due to fewer people being lifted out of poverty and the impact of austerity measures.
2. **The policies not only fail to tackle growing inequalities in income and wealth, and fail to promote fairer distribution, but are guilty of increasing an unfair burden** on the poor in deficit reduction measures, without an equal commitment to fairer taxation.
3. **There is no understanding of the need to promote balanced, comprehensive approaches to inclusive growth, beyond employment** and to prioritise bottlenecks to inclusion as well as to growth.
4. **The NRPs miss the opportunity to embed an adequate social floor with social investment**, with social spending seen not as a cost but an essential tool to achieve sustainable and inclusive growth – ensuring adequate minimum income and social protection, investment in social innovation, quality jobs and education.
5. **The NRPs' macro-economic approach is "business as usual"** – Stability, Growth and Jobs relying on the failed trickle-down model to impact on inclusion without ensuring that the benefits of growth are equally shared.

2. Progress towards meeting the poverty target

Guideline 10: Promoting social inclusion and combating poverty, clearly supporting income security for vulnerable groups, social economy, social innovation, gender equality, and referring to the poverty headline target.”

Europe 2020 poverty target:

“To achieve at least 20 million fewer people in or at risk of poverty and social exclusion, defined as at risk of poverty, severe material deprivation or low work intensity.”¹⁵

2.1 Failing to reach the EU Poverty Target

The June Council Conclusions¹⁶ and the Commission’s assessment of the National Reform Programmes (NRPs) have underlined the failure by Member States to set adequate poverty targets to meet the EU overarching goal. This is also true of other targets. However, in the case of the poverty target, the Commission has highlighted that it is not even possible to produce a comparative figure or to know “how close” the current targets are to the objective. *“It is not possible to calculate, for results cannot be calculated because of differences in national methodologies.”¹⁷* This is due to the fact that the poverty target is a complex combination of 3 different indicators (at risk of poverty, severe material deprivation and low work intensity) and member states were left free to pick and choose their own poverty indicator (all 3, 1 out of 3, or in some cases their own national indicator)¹⁸. This has undermined the possibility of achieving robust, comparative data which will enable a credible target. As a minimum, EAPN members expect to see that the poverty target should be treated the same as the other targets.

2.1.1 Lack of ambition and inadequate targets

All NRPs, except Luxembourg, have set a national target. The majority of Member States have utilized the combination of the 3 agreed indicators,¹⁹ whilst others have selected only one of them, e.g. Denmark (low work intensity) and Estonia and Bulgaria (at risk of poverty rate). Others have resorted to national indicators, including Germany (long-term unemployed), Sweden (Reduction of % of women and men who are not in the labour force - except full-time students, the long-term unemployed or those on long-term sick leave to well under 14% by 2020), France (reduction of the anchored risk of poverty rate) or Ireland (Consistent Poverty rate). The UK has merely highlighted existing numerical targets of the 2010 Child Poverty Act. The Czech Republic has confirmed that it would maintain the number of people at risk of poverty at 2008 levels and attempt to reduce it by 30.000.

¹⁵ The 3 indicators are: at risk of poverty, severe material deprivation and people living in households with very low work intensity.

¹⁶ European Council Conclusions (June 23-24 2011)

¹⁷ European Commission (7th June 2011), EC Communication: *Concluding the first European semester of economic policy coordination: Guidance for national policy coordination*.

¹⁸ Risk of poverty is defined as the percentage of people with an equivalised disposable income below 60% of the national equivalised median income. People are severely materially deprived if they experience 4 out of 9 deprivations - cannot afford to: i) pay their rent or utility bills, ii) keep their home adequately warm, iii) face unexpected expenses, iv) eat meat, fish or equivalent protein twice a week v) enjoy a holiday away from home once a year vi) have a car, vii) have a washing machine viii) have a colour TV ix) have a telephone. People living in households of very low work intensity are people aged 0-59 living in households where they work less than 20% of their total work-time potential during the previous 12 months.

¹⁹ At risk of poverty, severe material deprivation and low work intensity.

The target set by most Member States is seen by EAPN members as too low and below their proportionate share of the overall EU target, in relation to population and current poverty risk. Most EAPN members' responses express disappointment at the lack of ambition of their NRP targets (BE, BG, CZ, DK, DE, IE, LU, MT, NL, PL, PT, ES, UK) and the consequent implication of a lack of seriousness of the commitment to reduce poverty.

EAPN Netherlands: "The Netherlands has committed itself to reducing the number of persons in jobless households by 100.000 by 2020, using only one indicator. The target is like a drop of water on a hot plate..."

EAPN Denmark: "Only one indicator is used – low work intensity. The growing poverty is not addressed, not even mentioned. We recognize that Denmark is one of the countries where the at-risk of poverty is the lowest. But it is disappointing that poverty and social exclusion has not been targeted on a strategic level. No proper indicators have been developed. It is as if the year against poverty and social exclusion has not left its mark..."

2.1.2 Lack of transparency over indicator choice and calculation of poverty reduction

More worryingly, there is disquiet and unease about the lack of transparency over the target chosen, the choice of indicators and the reasons behind this. In several cases, the overall AROPE²⁰ indicator has been chosen (AT, BE, LT, PL, PT, RO, SK, ES), but often without specifying in the NRP how the reduction will be made for each indicator. This increases the difficulty of interpreting any reductions accurately. It is possible, for example, that a general restoration of employment as the economy recovers will reduce the number of low work intensity households, but not necessarily impact on the poverty or deprivation rate, if this work is precarious or paid below the poverty threshold. Or that pressure on average incomes because of the crisis impact will automatically reduce at-risk of poverty, but not reduce material deprivation or work intensity. Others voice concerns about the reasons for the choice behind the indicators, with fears that some Member States are more concerned with demonstrating positive outcomes than ensuring a real impact on poverty²¹ (BG, CZ, PT). It is clear that the poverty target is being treated differently from the other Europe 2020 targets, where the national indicators used are the same as the EU one, and expressed as a % reduction. A common demand is, therefore, to put the poverty target on an equal footing, agreeing the same indicators for all member states, i.e. for all three indicators, preferably with a % reduction which will enable effective comparison and transparent monitoring towards the common goal, as is the case with the other Europe 2020 targets.

EAPN Bulgaria: "The target is extremely low, and based only on the risk of poverty rate, which is absolutely inadequate for Bulgaria as the level of material deprivation is more than two times higher. Thus if we consider that the EU target is 17%, the national target is around 8%. Using this indicator as the only poverty indicator is very dangerous – it means that the very low target on poverty could be reached even for 1 year, by pressing down average incomes. This means that impoverishment could be statistically presented as taking people out of poverty."

EAPN Poland: "The Polish target is to decrease poverty by 1.5 million by 2020, but there is no choice of indicator from the three proposed by the EC. It is only written that the target includes people at risk of poverty and/or material deprivation and/or living in households without employed persons (ie with low intensity of work). This means that we do not know what exactly the NRP's concept of poverty is. It should be clearer which concept of hardship is being used."

EAPN Spain: "We fought for two things but didn't succeed: We asked for separate targets for the different indicators and a concrete target for child poverty."

²⁰ New Target: At Risk of Poverty and Social Exclusion. (AROP): this is the name given to the combination indicator agreed by MS in 2010, combining at risk of poverty, severe material deprivation and households with low work intensity.

²¹ R. Walker (2011), Expert Discussion Paper on Peer Review on Poverty Targets, Dublin 14-15 June.

2.1.3 Need for sub-targets, rooted in broader set of Social OMC²² indicators.

Several responses highlight the importance of setting sub-targets for key groups, in particular through the life cycle: for child poverty and older/young people. In some cases these were proposed in the NRP (Belgium – child poverty and over indebtedness, but also for older people and other key vulnerable groups). Many Member States recognise, to a greater or lesser extent, that child poverty and social exclusion are important issues that need to be tackled if the Europe 2020 objectives and targets are to be achieved. However, only a few countries have identified sub-targets to reduce child poverty in their NRPs.²³

Concern is also expressed that the “new AROPE” indicators for poverty should not be allowed to redefine the concept of poverty. There was strong affirmation of the need to use the full dashboard of Social OMC indicators to capture the multidimensionality of poverty, and in particular of growing inequalities which appear to threaten the EU project.

EAPN Portugal: “The 3 indicators are important but other indicators like inequality (Gini co-efficient and 20/80% quintile) are essential to show the face of poverty. The indicator on severe material deprivation does not show the real situation, as the specific elements are not relevant in Portugal.”

EAPN Belgium: “We need to make the trends in inequality more visible. The fight against poverty is also the fight against inequality. In Belgium, this is a very topical debate. The dramatic contrast between the austerity measures hitting people in poverty and the bonus culture for financial enterprise bosses is terrifying. The government should acknowledge the gap between rich and poor and give priority to these indicators.”

2.2 Will the policies proposed achieve the target?

Almost all responses highlighted the shortness in length, and lack of substance or detail in the sections on poverty and social exclusion, or the lack of reference to a timeline or budget (PT). In several cases, positive policy developments were left out (DK). Clearly the limitations of the format, requiring a reduced input, put strong restraints on the range, scope and depth of the sections in the NRP. However, an overwhelming impression was given to most networks that neither Guideline 10 nor the poverty target was an important objective for most NRPs. The dominant narrative was linked only to the economic semester: the objectives of the Annual Growth Survey, the European Council Conclusions on economic governance, and the Euro Plus Pact.

EAPN Denmark: “There are many policies in Denmark that reduce poverty and social exclusion. The NRP mentions the general welfare system and labour market measures, education, health, and integration for excluded groups, but this is not developed at all in the NRP. The policies proposed are not likely to reduce the growing poverty. The section on poverty and exclusion is very short. Much is missing.”

²² The Social OMC refers to the Open Method of Coordination (OMC) on social protection and social inclusion which is the mechanism for coordinating social policy across the EU.

²³ Eurochild, a member of EAPN, mentions in its analysis of the 2011 National Reform Programmes that there should be more recognition in the NRPs that measures to tackle poverty and social exclusion – and child poverty in particular – will also contribute to achieving other Europe 2020 headline targets.

2.2.1 Minimum income and social protection systems under threat

EAPN Scoreboard

POVERTY AND SOCIAL EXCLUSION	SCORE: 1-10
10. How far are measures taken to ensure an adequate minimum income and social protection? i.e. <i>are minimum income/benefits increased/improving take up and coverage/reducing conditionality?</i>	3.00 out of 10

A large number of networks highlight a very low or low priority given in the NRP to ensuring adequate minimum income and social protection (BG, CZ, DK, EE, IE, IT, NL, PL, PT, SK, SE). This is partly to do with the overriding employment focus in the NRP, but also reflecting the reality that a large number of Member States are restricting benefit levels and eligibility, as part of austerity measures to reduce welfare expenditure, despite the commitments publicly announced towards supporting their role as automatic stabilizers. These measures are reflected in the macroeconomic section (See previous chapter). There is some evidence of increased focus on ensuring that work/welfare traps are avoided for those closest to the labour market by building better transitions in benefits and tax systems. But for those furthest away from employment, the focus is mainly on increasing conditionality of benefits, with little concern for declining values of benefit thresholds and the impact on the right to a dignified life²⁴ and the devastating short and long-term social impact on those who have no choice but to survive on minimum benefits. In some countries, (IT, HU, EL) no national statutory minimum income schemes were in place before the crisis and the NRPs make no mention of the need to implement such a commitment, or indeed to discuss the issue (IT).

EAPN Estonia: “What is missing is a focus on greater social protection – the new employment law is strongly tilted towards the employer, minimum income and affordable social services are missing and particularly a benefit system, based on needs. Right now more than half the social benefits miss those who need the help the most.”

EAPN France: “The focus on Active Solidarity Income (RSA) is positive, but there is no revaluing of the social minimums for people who are furthest from the labour market.”

EAPN Ireland: “While the NRP mentions ensuring that the incomes of the poorest families are protected, there is no sense that this is the approach that is being pursued, and social welfare rates have been cut in two subsequent budgets. ...It mentions the stronger financial incentives to return to work. It is feared that this refers to a more compulsory approach to activation which could result in a cut or loss of welfare payments to recipients.”

EAPN Poland: The main missing policy subsystem is income maintenance. It is difficult to mitigate poverty and active inclusion without that pillar of active inclusion. It is striking that in the NRP there are no references to some positive new amendments on the act of social assistance – which permits combining social assistance with income from employment for up to two months. The scandal of a deliberate non-indexing of eligibility of income thresholds in social assistance is also a good lesson. Indexing should be automatic and ensure that eligibility thresholds are never below the subsistence minimum.”

Some positive examples

A few Member States appear to recognize the core role of ensuring adequate minimum income, as an investment in social justice, and in people and the economy (particularly AT, BE, PT and LT). This includes investing in increased funding for social security and social protection systems, as an alternative approach to crisis recovery. However, the lack of detail on concrete implementation and budgets weakens the proposals. In some cases, adequacy of minimum income is still under question (AT, BE) and the connection to an integrated, holistic active inclusion approach.

²⁴ European Council Recommendation on adequate resources (1992).

EAPN Austria: “The main new social policy introduced in the last year is a new minimum income system. However, this system is not adequate with regards to the amount paid (according to the first experiences in some of the federal states where a number of people are even getting less than the old benefit system), it lacks a rights approach and there are still differences from state to state. Theoretically it takes an active inclusion approach, as all people are meant to be supported with regards to labour market inclusion, but there have been just a few pilot projects and real strategies are missing.”

EAPN Belgium: “There is a clear reference to the need to increase minimum income – (RI – Revenue de Intégration) by 2% along with all social benefits as well as the guarantees of income for older people (GRAPPA) from September 2011. The budget impact is calculated at 18 million in 2011 and 66 million in 2012. We would have liked to see a commitment to raise all benefits and pensions to above the poverty threshold.”

EAPN Portugal: “The NRP talks of guaranteeing a coherent network of social minimums, fostering inclusion. This includes increased allowances for single parent families and protection for the aged. But although mention is made of active inclusion, adequate income is not framed as part of a national strategy to promote active inclusion, with clear measures, targets, monitoring actions and towards different groups.”

EAPN Lithuania: “The NRP includes reference to the drafting of the amendment of the law on monetary social support to low-income families and single persons. This aims to improve the system of monetary social support ... to be attributed to local authorities, enforcing more sound mechanisms for social support and the compensation for heating/hot water costs to low income people.”

2.2.2 Reduced access to quality services

EAPN Scoreboard

POVERTY AND SOCIAL EXCLUSION	SCORE: 1-10
11. How far is access to affordable, quality services prioritised? i.e. <i>is focus given to ensuring affordable access to housing, child and other care services, health, education and training, counselling, as well as tackling energy poverty?</i>	3.61 out of 10

The majority of responses highlight a low priority given to ensuring affordable, quality services – particularly health, education, housing, and services for people with disabilities and other vulnerable groups. (BG, DK, EE, IT, LU, NL, PL, PT, ES, SK, SE). Networks highlight that, as measures are minimally described, it is difficult to assess their effectiveness. Many networks consider this a missed opportunity to tackle the multidimensionality of poverty and invest in prevention, by ensuring effective access to in-kind services. They miss a global integrated strategy towards service provision specifying effective objectives, policies and measures to increase access to each area, for specific target groups and assessing the need for effective forms of delivery. Where social services are specifically mentioned it is mainly in the context of reform to ensure their “efficiency and sustainability”. However, the dominant driver appears mainly to be economic stringency. In some cases, this means opening up delivery to NGO providers, but often in the potentially conflictive context of reduced funding levels.

EAPN Belgium: “We are missing a more ambitious and redistributive approach, which sets clear objectives and measures to take to ensure access to the different rights and services – e.g. housing, health – or at least a reference to a general plan which covers all these areas.”

EAPN Czech Republic: “There’s a focus on reform of social services – continuation, financing and sustainability... but in reality it is very vague about their future. A major lack is a national concept of social housing.”

EAPN Luxembourg: “There is a tendency in the NRP to make general declarations. We need more precise anti-poverty policies e.g.... support services to accompany young people into work..... in the area of housing – development of the social real estate agency, and support for those who pay high rents.”

Some positive examples

EAPN members reference a small number of NRPs that show positive examples of increasing investment, particularly in increasing or extending services to promote the social inclusion of key vulnerable groups (SK, PT, LT). In Slovakia, new legislation on socially excluded communities and community centres is planned. In Portugal, a Comfortable Housing for the Elderly programme is planned to increase access to affordable housing for the elderly. However EAPN points out the need to extend the service to people who rent. In some countries there is a shift away from services provided by the public sector to the NGO or third sector. Without more budget details, it is not possible to assess whether this represents an increase or reduction in investment. Guaranteeing the right of access to affordable services, as a public service obligation is on few countries’ agenda. The Right to Housing in France is an important exception, although EAPN France highlights some difficulties over the implementation.

EAPN Lithuania: “The NRP highlights plans to improve access to and development of quality social services through wider NGO involvement... as well as improving access to housing for socially disadvantaged groups. Some examples include:

- Programme for the modernization of the infrastructure of social services residences.
- National Programme for social integration of people with disabilities 2003-12: developing community services, improving quality of life, assessing special needs, supporting access to employment.
- Lithuanian Housing Strategy: increasing the scope for individuals to rent in private sector, compensating the rent of low-income individuals.”

2.2.3 Employment only, rather than integrated, active inclusion approach

EAPN Scoreboard

POVERTY AND SOCIAL EXCLUSION	SCORE: 1-10
12. How far are integrated active inclusion approaches promoted? i.e. <i>integrated strategies to ensure adequate minimum income, access to quality jobs and services.</i>	2.72 out of 10

A large number of networks underline that the main policy solution put forward for reaching the poverty target, is overwhelmingly employment only, primarily with emphasis on supply-side measures: hardening activation to increase ‘motivation’ to work (BG, CZ, DK, EE, DE, IT, MT, NL, PL, PT, ES, UK). Whilst a decent job can play a crucial role in providing a sustainable route out of poverty, this is not always the case, where 8% of people in work are in poverty, and 22% of people at risk of poverty are working²⁵, and where the few jobs on offer remain precarious, part-time, temporary and low-paid. Many responses highlighted the lack of a clear rights’ framework or reference to the Charter of Fundamental Rights or to the Horizontal Social Clause in the new Reform Treaty.

EAPN Poland: “In the NRP, we find a simple theory of poverty and social exclusion. The main cause is unemployment or economic inactivity of more vulnerable groups and the remedy is

²⁵ SPC (2011), *SPC Assessment of the social dimension of the Europe 2020 strategy* (10 Feb 2011).

employment. The report acknowledges that the state has no instruments to decisively resolve social exclusion in the longer term.”

EAPN Malta: “EAPN Malta highlights that work on its own does not guarantee a way out of poverty. It is evident that poor people are mostly moving from unemployed poor to employed or working poor. The Anti Poverty Forum (MT) calls for a more integrated approach complemented with a rights base, and a stronger social security and protection system to support people who cannot access the labour market.”

EAPN Sweden: “The goals are a disappointment since they only focus on having people in work. There is no focus on reducing growing inequalities and the lowered standard facing people depending on support from society due to sickness, unemployment etc.”

Some positive examples

An integrated Active Inclusion strategy,²⁶ combining the guarantee of an adequate minimum income, access to services and to an inclusive labour market, is a key instrument to support the delivery on the poverty target, both in terms of supporting people into decent work and reducing the number of jobless households, but also through boosting adequate income and ensuring access to services, thus helping to prevent and reduce risk of poverty and material deprivation. However, the concept gets little reference in the majority of NRPs, according to EAPN networks (AT, BG, CZ, DK, EE, FR, DE, IE, IT, LT, MT, NL, PL, RO, SK, SI, SE, UK).

Although there are a few examples of NRPs that name and explicitly back the Active Inclusion Strategy (AT, BE, PT, ES), the detail is often insufficient to assess whether a fully integrated approach is proposed and the effectiveness of the measures.

EAPN Austria: “Theoretically Austria takes an *Active Inclusion* approach, as all people are meant to be supported with regards to labour market inclusion, but there are few pilot projects and few real strategies. Adequacy of minimum income needs to be more clearly guaranteed, and there is a need for improvement of access to social services – housing, healthcare, delivering on the promised initiatives to improve labour market inclusion for those who are furthest away.”

EAPN Portugal: “There is some confusion as in the Portuguese version of the NRP active inclusion is explicitly supported, but in the English version this is translated into social inclusion, and as the policy is not backed with clear measures, targets, monitoring actions etc, it is difficult to assess its effectiveness.”

EAPN Spain: “In the NRP there is a concrete paragraph: promoting active inclusion, however, the policies are primarily to promote and improve employment opportunities rather than an integrated approach.”

2.2.4 Limited thematic approach with adhoc listing of priority groups

Most NRPs are scored low or very low by EAPN networks, in terms of how far policies are targeted to the key priority groups (recognized through the Open Method Coordination for social protection and social exclusion)²⁷. In several cases, the listing of target groups appears rather random, or at least no clear justification was offered for the selection of priority groups. EAPN Bulgaria also highlighted the dangers of a reductionist approach, only focusing on “marginalized groups” rather than first establishing an overarching, integrated strategy.

EAPN Spain: “Our input on priority groups was taken on board. The full list of vulnerable groups appears once in the beginning and is referred to later in the text. Specific groups are given more priority: people with disabilities, children, older people...”

²⁶ EAPN (2011): [Active Inclusion - making it work, EAPN policy into practice booklet](#).

²⁷ See European Commission/SPC Joint Reports on Social Protection and Social Inclusion 2008, 9 and 10.

EAPN Bulgaria: “There are a list of groups: children, Roma, women etc – but in a situation of mass poverty, which is the characteristic of Bulgaria, there is a need for overall economic and social policies to be centred around the struggle against poverty and social exclusion and not just targeting specific groups...”

2.2.5 Increased recognition of child poverty but mainly work-related measures

EAPN Scoreboard

POVERTY AND SOCIAL EXCLUSION	SCORE: 1-10
13. How far are effective policies put in place to tackle child poverty ? i.e. <i>ensuring adequate family income, supporting parents into quality jobs, and access to affordable quality care services, defending children’s rights.</i>	3.22 out of 10

Several EAPN Networks highlight the priority given to Child Poverty in the NRPs (BE, BG, CZ, IE, LU, ES, PT and RO). This is generally welcomed. However, the priority is not always backed by detailed measures and increased budgets (PT). In some cases, doubts are cast on the implementation (RO). Most policies give a strong priority to increasing access to employment for parents, particularly single mothers. There are however concerns expressed about the lack of attention to the quality of jobs, the conditions for work-life balance and availability of affordable, quality childcare. Other proposals focus exclusively on educational issues (particularly early learning), and most fail to give priority to ensuring an adequate income for parents who are unable to work or to give a focus to children’s rights. In other countries, e.g. Italy, members point out the marked absence of focus in the NRP on child poverty, despite the existence of some of the highest child poverty rates in the EU, including poverty rates for single parents. This is the reason why Eurochild is advocating for specific national inclusion strategies to underpin the NRPs, which should include a section on child poverty and social exclusion that fosters an integrated and rights-based approach to the inclusion of children, and is backed up with clear implementation plans.

EAPN Malta: “The main idea behind the fight against poverty and child poverty is related to the workforce. To address child poverty the government should move beyond a family to a more child-centred approach. More flexible hours (complemented with affordable childcare centres) would be more accessible for single parents (generally mothers).”

EAPN Estonia: “Family and Youth are the priority in the NRP, but this is mostly educational measures. Child poverty is not mentioned, kindergartens and schools are not sufficiently financed, all hobbies are expensive for children and in the summer there is no system for supporting families with children.”

Some positive developments

The mutual learning developed through the Social OMC, and supported by the important conference on child poverty and well-being (Sept 2010) held by the Belgian Presidency and key actors like Eurochild, has built the basis for a growing consensus on building effective, integrated child poverty strategies. In June 2011, the EPSCO Council adopted Council Conclusions which set out a three-pronged approach: ensuring adequate family income, access to services – including early learning and child care - and promoting the voice and empowerment of children. In a small number of countries, members highlighted signs of an integrated approach in their NRPs. These three pillars should form the basis of a Recommendation from the Commission in 2012 on child poverty and well-being. The comprehensive approach should also be reflected a lot stronger at national level and in future NRPs. At the moment, Eurochild also found that in only a limited number of Member States are NRPs’ social inclusion measures supported by a clear national framework for tackling child poverty and social exclusion.

EAPN Ireland: “The NRP highlights support for a multidimensional approach to child poverty and a connection to the three themes of active inclusion.”

EAPN Lithuania: “The NRP cites the National Child Welfare Policy Strategy and the reorganisation of the Child Care welfare system (2007-12).”

EAPN Spain: “Measures are proposed to facilitate access to employment for adults with dependent children (especially single parents), increasing range of childcare/educational services for 0-3 and increasing educational grants. Priority will be given to reducing child poverty in the national strategic plans for childhood and adolescence and in the NAP’s Inclusion.”

EAPN Portugal: “A budget of 66,6 million EUs is set. Steps are taken to raise the single parent family allowance and pre-natal support, measures to target the fight against early school leaving, investment in national network of integrated continued care (860 million), extension of crèche network and raising awareness of social partners of the need to adopt measures to flexibilize working hours.”

Some members highlight good practices regarding an *increase in measures to promote better access to childcare facilities*. However, the issue of affordability is not always apparent.

EAPN Czech Republic: “The development of family centres, business and non formal nurseries whilst respecting quality standards...”

EAPN Luxembourg: “We welcome increasing the number of day care places to enable women to continue in work. However the NRP appears to maintain fees despite a previous announcement of free service; even reducing the fees is not foreseen.”

Others highlight examples of programmes to promote a more *inclusive education* for young people from excluded groups.

EAPN Germany: “A new programme is proposed to promote the better education and inclusion for disadvantaged children and adolescents (Teilhabe-und Bildungspaket).”

2.2.6 Low priority and incomplete measures on homelessness and housing exclusion

EAPN Scoreboard

POVERTY AND SOCIAL EXCLUSION	SCORE: 1-10
14. How far are policies promoted to tackle homelessness and housing exclusion ? i.e. <i>access to appropriate housing and support services, ensuring adequate income?</i>	2.33 out of 10

In the case of *Homelessness and Housing Exclusion*, EAPN responses from national networks generally found that the NRPs gave insufficient priority (AT, BG, CZ, DK, EE, IE, IT, NL, PL, PT, SK, SI, SE, UK). Members highlighted that, even where the homeless were mentioned as a priority group, there was often a lack of concrete measures (IE, PT). However, FEANTSA²⁸ underlined that, given the overall weakness of the social inclusion chapters, it should be recognized that homelessness emerged as one the few specific social problems given priority. According to FEANTSA’s assessment, 12 countries mentioned homelessness as a specific problem. Some countries refer to the need for a specific strategy (FR, LU, FI, BG, PT, BE); other countries consider homeless people as a specific target of their employment and/or housing policies (UK, ES, PL), still other countries see homeless people as specific target group of social inclusion policies (IE, RO, EL). (For a full analysis, see www.feantsa.org).

²⁸ FEANTSA is the European Federation of National Organisations Working with the Homeless and a European Organisation member of EAPN.

FRANCE : “As part of this strategy, new tools were devised in 2010 aimed at restructuring the system of reception facilities for the homeless, accommodating them and integrating them back into society, and these will be deployed between now and 2013. One example is the creation of an integrated system of reception facilities and guidance and counselling services, coordinating all of the different bodies involved in accommodation and housing in each Department of France. Similarly, work began in December 2009 on the territorial planning of the supply of reception facilities, accommodation and integration of homeless persons, and in 2010 this led to the framing of Departmental Plans for the reception, accommodation and integration of homeless or badly-housed people, in consultation with local actors. These Departmental Plans are naturally based on the three basic pillars of the national strategy for accommodation and access to housing, namely: consistency with the housing first objective; organising supply in order to take the needs of deprived persons more fully into account; improving guidance and counselling; and continuity of care for persons turning to the accommodation system for help.” (French national reform programme 2011-2014).

FEANTSA underlines that progress on homelessness in the NRPs and at EU level should benefit from an EU homelessness strategy, on the basis of the EPSCO Council Conclusions in the Joint Report 2010, which has been called for by the European Parliament, Committee of the Regions (CoR) and the European Economic and Social Committee (EESC) and which was one of the main conclusions from the Consensus Conference held by the Belgian Presidency in 2010.²⁹ EAPN also underlines the importance of setting such a strategy within the broader integrated objectives of the EU Social Inclusion strategy (as part of the Social OMC) and follow-up in the European Platform against Poverty.

2.2.7 Policies supporting inclusion of ethnic minorities and migrants largely absent

EAPN Scoreboard

POVERTY AND SOCIAL EXCLUSION	SCORE: 1-10
15. How far are policies promoted to fight discrimination, particularly against migrants (including undocumented migrants and ethnic minorities - Roma)? <i>i.e. actions taken to ensure equal access to rights, resources and services.</i>	2.77 out of 10

Most responses noted a low or very low priority for these groups (AT, BG, DK, IE, IT, LU, NL, PL, PT, SK, SE). Sometimes, national strategies were quoted without providing details of implementation. In some cases, key developments were overlooked or given little prominence - for example in France, where restrictive measures are being introduced against Roma and the development of a draft law restricting the access of migrants to the right to a temporary stay for health reasons. (See also Chapter 5).

EAPN Czech Republic: “Roma and socially excluded Roma are highlighted, but the main measure proposed is the support of the Government Agency. The detailed proposals in relation to field work, where the real changes happen, is very weak, brief and unclear.”

²⁹ Conclusions from the Consensus Conference on Homelessness (December 2010). See Feantsa’s website: <http://feantsa.horus.be/code/EN/pg.asp?Page=1301>.

2.2.8 Building on the Social OMC to develop effective multidimensional approaches

Few NRPs made any reference to the need for an integrated approach to deal with the multidimensionality of poverty and social exclusion. For most networks, this reflects a failure to build on the wealth of learning developed over the last decade through the Social Open Method of Coordination (OMC). This learning has underlined that comprehensive, integrated responses are what works - tackling the structural causes as well as the consequences of poverty and social exclusion, investing in universal services that can prevent as well as alleviate poverty, combined with specific measures to tackle the obstacles each group face. For many networks, this failure underlines the vital role of the Social OMC and, in particular, the importance of continuing to invest in National Action Plans and National Strategies on Social Protection and Social Inclusion, based on the OMC Common Objectives (2006)³⁰, to underpin the NRP. EAPN welcomes the fact that this view has been supported by the SPC and recently endorsed by the EPSCO Council, supporting the SPC opinion on the role of the Social OMC in Europe 2020³¹.

EAPN Belgium: “The NRP lacks a clear reference to a clear plan or strategy to fight poverty and social exclusion. It should specify complementary instruments based on a clear strategy, setting out the objectives and the actions, as in the National Action Plans for Inclusion (NAPs). The NRP does not offer a sufficient guarantee nor a credible strategy to attack the problem.”

EAPN Denmark: “We think it is necessary to keep the NAP Inclusion. The first NRP is not a good experience for fighting poverty and social exclusion – where it is treated as an unwanted step mother.....”

Some positive examples

Some networks, however, highlighted some commitment in their NRPs to integrated approaches to social inclusion and integrated development (BE, IE, LT, PT, ES). Three of these NRPs (BE, IE and ES), make an explicit reference to the importance of developing *Integrated National Action Plans for Social Inclusion and National Strategies for Social Protection and Social Inclusion*, based on the Common Objectives, to ensure a comprehensive, detailed and effective policy base for the development of the NRP.

EAPN Spain: “The Spanish NRP establishes the development of a new NAP: “*The set of measures aimed at social exclusion will form part of the forthcoming National Action Plan for Social Inclusion (2011-13), to be developed by the Government and interested parties. Specific plans will also be development for Roma (the Plan for Action for the Development of the Roma Population 2010-12) and the 2nd Strategic Plan for Children and Adolescents 2010-13.*”

EAPN Portugal: “Three important objectives have been established: 1) fighting inequalities and furthering social injustice, 2) promoting a new intergenerational contract and guaranteeing a coherent network of social minimums, 3) fostering social inclusion, but there is often no information about concrete measures, time line, or the budget execution.”

EAPN Lithuania: “The NRP sets important pre-conditions for reducing poverty and social exclusion: successful policies for social exclusion prevention, and employment promotion as well as health care policies that enforce fair relationships between social security and health care. Measures include improved access and development of high quality social services through wider NGO involvement, the development of a financially stable system of social security benefits guaranteeing adequate income and implementing a pension system reform ensuring its sustainability, transparency and adequacy.”

³⁰ OMC social protection and social inclusion Common Objectives (2006).

³¹ SPC Opinion on role of Social OMC in Europe 2020, endorsed by the EPSCO Council (June 2011).

SUMMARY OF MAIN MESSAGES

1. **The failure to reach even the EU poverty target reflects a lack of seriousness about poverty reduction and is unacceptable.** There is evidence of cherry-picking and gaming in the selection of the indicator. All Member States should set the same % target on all 3 indicators, as with the other Europe 2020 targets, with appropriate sub-targets on most at-risk groups.
2. **The policies proposed are generally skimpy, inadequately detailed and overly focused on employment,** rather than investing in integrated Active Inclusion approaches. In general they appear to be geared to the objectives of the Annual Growth Survey and Euro Plus Pact, than to the integrated guidelines for promoting social inclusion (Guideline 10).
3. **Social protection systems are under attack!** Despite the commitments of the horizontal clause (Article 9), their crucial role as an automatic stabilizer for the economy, and base for social and active inclusion is ignored. Positive learning from Member States who suffered less from the crisis: investing in adequate minimum income and social protection, and ensuring affordable access to quality services, is not being analysed or built on.
4. **Thematic approaches for key disadvantaged groups are generally adhoc and unsystematically treated,** ethnic minorities and migrants are largely absent. Whilst there are positive examples of measures to tackle child poverty and homelessness, they fall short of comprehensive integrated approaches based on a clear diagnosis of the obstacles faced.
5. **The learning and experience from the Social OMC is being largely ignored.** The need for integrated approaches to tackle the multidimensionality of poverty and social exclusion and ensure access to rights, resources and services is seriously absent from most NRPs. This underlines the importance of embedding the Social OMC and particularly National Strategies for Social Protection and Social Inclusion, which can integrate the 3 pillars, to underpin the NRPs' delivery on the poverty target and social objectives.

3. Progress towards Inclusive Labour Markets

Europe 2020 Integrated Guidelines

Guideline 7: Increasing labour market participation and reducing structural unemployment.

Guideline 8: Developing a skilled workforce responding to labour market needs, promoting job quality and lifelong learning.

In October 2008, the European Commission adopted its Recommendation on the Active Inclusion of People Furthest from the Labour Market. One of the three mutually reinforcing pillars is called Inclusive Labour Markets, and speaks explicitly of providing people with personalised, integrated counselling, adapted to their complex needs, in order to create pathways towards inclusion and quality jobs. In 2010, the European Commission's Europe 2020 Strategy established as one of its 5 overarching priorities to reach a "75% employment rate for women and men aged 20-64 by 2020—achieved by getting more people into work, especially women, the young, older and low-skilled people and legal migrants".

In implementing this target, Member States should aim at creating inclusive labour markets, raising participation in employment through positive activation, tailored measures, support for vulnerable groups, integrated services, access to training, job creation, and offers of decent, sustainable employment. Only in this way, will the employment target be reached in a meaningful way, and contribute to the poverty-reduction target of the Europe 2020 Strategy. However, EAPN national networks' assessment of the National Reform Programmes (NRPs) (2011) tell a different story, as shown by the Scoreboard assessment made by EAPN members below.

3.1. Ambitious target, low commitment

Most EAPN members (AT, BE, EE, PL, SK, RO, SE, PT) are of the view that the proposed employment target in their countries is ambitious enough, although some express doubts about it being also achievable (PT). However a few countries (IE, IT, LU) state that the proposed objective falls short of the EU target, as well as the country's real possibilities. Disappointingly, countries like the UK did not even fix an employment target. A few Member States (RO, ES) have opted for a mid-review of the target, or for intermediate objectives, as suggested by the Europe 2020 Progress Report of the Annual Growth Survey.

This target, however, is in many countries much less ambitious than it may seem. While it does not take into account any qualitative aspects of either the activation process or the jobs proposed, the objective is not even to ensure full employment, in terms that most people on the ground can understand. For Eurostat data collecting purposes, "Employed population consists of those persons who during the reference week did any work for pay or profit **for at least one hour**, or were not working but had jobs from which they were temporarily absent"³². The narrow scope of the indicator means that it is likely that most Governments' efforts will only be aimed at satisfying minimum criteria, instead of focusing on real, concrete strategies to build inclusive labour markets, contributing to the long-term reduction of poverty and social exclusion.

3.1.1 What about sub-targets?

Several Member States have opted for breaking down the overall target into sub-targets, such as young workers (AT, DE, SI), women (BE, BG, FR, DE, ES), youth (BE, BG, EE), older workers (BE, BG, SI), low-skilled workers (BG), the long-term unemployed (EE, SI).

³² According to Eurostat definitions - <http://epp.eurostat.ec.europa.eu/tgm/web/table/description.jsp>.

The access to the labour market on behalf of certain groups is mentioned by some countries as a priority (AT, IE, IT, LU, SE, PT), without, however, breaking down the target to fit these groups. Belgium will be focusing on reducing the employment gap between Belgians and non-EU citizens living in the country. Bulgaria also mentions a specific focus on parents with small children. Portugal focuses mostly on young workers, although refer also to the access to the labour market of the unemployed (particularly those with low skills) and Social Insertion Income beneficiaries.

When defining the target, some countries have prioritized specific areas of employment which need urgent intervention, rather than specific groups, such as quality work (AT), combating undeclared work (IT), balancing security and flexibility (LT). Several countries mention skills upgrading and better matching of skills in the context of achieving the proposed employment target (SE, LT, PT). Unfortunately, these countries do not, by far, constitute a majority.

Most of our members feel that, even when specific populations are identified, concrete targeted measures are absent, or there is no reference as to how these measures will be implemented in times of crisis and fiscal consolidation constraints.

EAPN Ireland: “While the EU target is for those over 20, those under 20 experience very high unemployment levels and should also be included in this target with specific measures.”

EAPN UK: “There is a belief that the private sector will create the jobs required in the UK economy and that the Government’s job is merely to set the conditions for this to happen.”

3.2. Missing or inadequate policies to increase quality, boost demand and support social economy

3.2.1 Pushing people into jobs that don’t exist

EAPN Scoreboard

EMPLOYMENT	Score 1-10
4. How much priority is given to creating quality jobs , which excluded groups could access? i.e. <i>investment in job creation, particularly green/social jobs? Are they quality?</i>	2.77 out of 10

Despite the emphasis given by recent Commission documents (e.g. the European Agenda for Skills and Jobs³³, Guideline 7³⁴ and the Joint Employment Report³⁵), job creation remains a marginal element in most NRPs reviewed by EAPN networks, as reflected also by the Scoreboard above, with EAPN Networks giving a very low average score of 2.77 out of 10. Very few Governments (LT, IE, CZ, PT) speak explicitly about addressing the demand side, and not all propose concrete measures to foster job creation. Several members (CZ, IE, SE) insist on the dire need of placing more emphasis on the demand side and investing in the creation of decent, sustainable employment, especially accessible to vulnerable groups, and in disadvantaged regions, including with a better use of EU funds. EAPN networks would like to see more support for green economy, for training and job creation in this sector (IT), but also to ensure energy efficiency and to combat energy poverty (UK). There should be more support for young people who would like to explore opportunities in agriculture and in rural areas (IT, NL). The absence of the demand side is notable not only in relation to job creation, but also in what concerns social responsibility, flexible working, investing in human resources and combating discrimination (SI).

³³ See also Chapter 4.

³⁴ “Member States should also [...] support self-employment and job creation in areas including green employment and care and promote social innovation.”

³⁵ See pages 6, 9, 13.

EAPN France: “The cost of labour is the only factor taken into account to stimulate labour demand. No hypothesis is advanced regarding the impact on employment of envisaged micro-economic policies.”

EAPN Italy: “What is missing is the correct use of the European funds for increasing the employment rate in the South.”

EAPN Ireland: “A major flaw in active labour market policy has been and continues to be its almost exclusive focus on the supply side of the issue and the inadequate focus on the demand side. This issue must be finally addressed: there is nowhere for potential employees to go if employers are not factored in policy developments as well.”

A positive example

The only reported positive example in this respect is Lithuania, where incentives to create new high quality jobs will be raised by reducing the tax burden for employers, linking wages with productivity growth, applying targeted subsidies for the creation of new jobs in high-level unemployment territories and developing corporate social responsibility of enterprises. The NRP speaks explicitly of promoting job creation and work force demand, by implementing measures for encouraging entrepreneurship, retraining rural work force from agricultural to other activities, organising temporary work in enterprises suffering economic difficulties, supporting employment of people with disabilities and promoting social dialogue.

3.2.2 Quantity without quality

EAPN Scoreboard

EMPLOYMENT	Score 1-10
5. How far are strategies proposed to increase job quality and tackle in-work poverty ? <i>i.e. raising wages, improving access to quality jobs, job security, employment rights and conditions, reducing precariousness.</i>	2.6 out of 10

EAPN members give a low rating (2.6 out of 10) to the effectiveness of the NRP proposals in increasing job quality or tackling in-work poverty. The vast majority of the NRPs reviewed by our members do not take into account in any way the quality of employment proposed, despite explicit reference to it in Guideline 7³⁶, the Joint Employment Report³⁷, and the Flagship Agenda on New Skills and Jobs. Targets are purely numerical and do not include any reference to what kind of employment is promoted, and whether it will ensure poverty-free, dignified lives, or propose ways of reducing in-work poverty. Several EAPN networks state that the provision of living wages and strengthening employment protection and security of contracts are crucial missing dimensions (BE, CZ, DK, FR, PL). In Germany, members urge the Government to adopt a national statutory minimum wage and to abolish the so-called “mini-contracts”. Precarious contracts are also on the rise in Poland and Slovenia, and, in the latter, minimum wage effectively condemns people to poverty. In the UK, EAPN urges that it is vital to enlist Government support to ensure that the public sector provides living wages. Most members also highlight missing links between employment and poverty. Low wages and insecurities only create more in-work poverty, which should be properly tackled and it is often under-reported and not discussed.

EAPN Slovenia: “Minimum wage is below the poverty line, so it is essential that the minimum income is at least equal to the poverty line. Now people working for the minimum wage live in poverty, and with their pensions, their children will likely live in poverty too.... The NRP also does

³⁶ “The quality of jobs and employment conditions should be addressed by fighting low-wages and by ensuring adequate social security also for those on fixed contracts and the self-employed.”

³⁷ See pages 6, 9, 13.

not mention quality jobs, increasing job quality, tackling in-work poverty – it is all focused solely on recruitment target and within that quality jobs and decent life are not mentioned.”

EAPN Slovakia: “Proposed measures (decrease protection of work by the labour code reform; so called intermediary labour market) will stimulate creation of marginal, less protected and low quality jobs with indecent pay.”

EAPN Ireland: “The issue of quality jobs including access, job security, employment rights, precariousness, are not addressed. Working poor are just named under the section on poverty.”

Some positive examples

Some members report increased social protection and rights, especially for precarious workers (PT, BE, RO, ES). In Belgium, tax reductions are granted for the low earners, ensuring a higher level of disposable income without entailing reduced protection. Also, public subsidies for traineeships will be made available. In Portugal, the NRP makes reference to a more flexible system for the accumulation of salary with unemployment benefits (PT).

EAPN France: “An entire paragraph of the NRP is dedicated to the Active Solidarity Income (RSA) and a national conference is announced for the end of 2011 to review the situation.”

EAPN Ireland: “The NRP includes a commitment to reverse the cut to the national minimum wage made by the previous Government earlier this year. However, it also mentions the review of other mechanisms for setting the minimum wages for certain low paid sectors, which is underway. It is not clear what the outcome of this will be and there is a strong political push to undermine the pay and conditions of low paid and vulnerable workers.”

EAPN Portugal: “A mechanism will also be created to monitor the evolution of precarious employment, together with the prohibition of unpaid work placements... In the section Poverty Reduction Target, the document makes reference to the reduction of inequalities, relating it to in-work poverty. No explanation how it will be done.”

3.2.3 Limited support for social economy

EAPN Scoreboard

EMPLOYMENT	Score 1-10
6. Are social economy and social innovation promoted, including through appropriate legislation, tools, as well as funding and can NGOs easily access this funding?	2.35 out of 10

Social economy has been mentioned repeatedly in documents such as the Employment Guidelines³⁸, the European Platform Against Poverty, the Joint Employment Report and the Flagship Agenda on New Skills and Jobs, and has been praised for its potential to create quality jobs, provide supported employment for vulnerable groups, and contribute to training and inclusion. But only a restricted number of EAPN members (PT, LT, SI, IT, BG) report references to social economy or social enterprises in the NRPs, and in the case of the latter two, these references are under the poverty and social inclusion chapter, (i.e. as a road to inclusion). Whilst this is a crucial role for the social economy, it does not sufficiently recognize the potential for creating sustainable employment. A significant number of EAPN members (AT, CZ, DK, IE, IT, NL, UK) demand more explicit support and recognition for the role of social economy in contributing to meeting both the employment target and the poverty targets through creating sustainable, quality employment for excluded groups.

EAPN Portugal: “The NRP talks about the social employment market, to support the integration of the groups most removed from the labour market.”

³⁸ “Member States should also actively promote the social economy and social innovation in support of the most vulnerable.”

EAPN Slovakia: “There should be more funds given to employment policy. Social economy should be much more supported and good practice examples from abroad should be studied and adopted.”

EAPN Lithuania: “The “Quality Employment and Social Inclusion” plan includes a provision on supporting employment of the disabled in social enterprises.”

EAPN Slovenia: “The NRP make references to training programs and national regulations (e.g. law about social enterprises, laws on employment and labour market, pension reform) with the aim of creating new jobs, but nobody can predict how effective these regulations will be. In our opinion the current practice was not very effective.”

EAPN Italy: “Regrettably, there is no mention of the many social enterprises and cooperatives, which have been instrumental in offering job and integration opportunities to the disadvantaged. Despite Italy being one of the first EU countries to have a framework law on social cooperation and that much has been done over the years, the survival of many social cooperatives is currently at stake.”

EAPN members note some positive developments, such as the promotion of subsidized employment as a tool for the inclusion of vulnerable groups (DE, NL, LT).

3.3 Low priority for positive activation and personalized support!

EAPN Scoreboard

EMPLOYMENT	Score 1-10
7. How far is access to work for excluded groups prioritised through personalized pathways ? i.e. <i>individualised support to access work, without hardening sanctions and increasing conditionality</i> ?	3.26 out of 10

3.3.1 Active Inclusion is misunderstood

Despite the explicit commitment to inclusive growth and extensive references in the Joint Employment Report³⁹ and the European Platform Against Poverty⁴⁰, an overwhelming number of EAPN members report that Active Inclusion, and, more specifically, the inclusive labour market pillar, is not mentioned in the NRPs, or it is misconstrued. Only a worryingly small number of reviewed countries (EE, NL, FR, DE) seem to have opted for more inclusive measures, while only Portugal and Germany refer to specific measures regarding the improvement of the access to jobs.

EAPN Belgium: “People furthest from the labour market are perceived as a bottleneck and a “problem group”. This is the consequence of EU pressure to reach “the employment target”, without taking into account quality of work. If we start from the reverse logic, namely, that labour markets are not inclusive enough for vulnerable groups (and hence it needs to be adapted), we arrive immediately at quality work and the Active Inclusion recommendation...”

EAPN Czech Republic: “In connection to Active Inclusion two aspects are mentioned: a) removing the mechanism in social and tax system, that motivates people to be economically inactive; b) strengthening individual responsibility for their personal situation – the approach is that the excluded should try to improve their social status by themselves through entering the labour market.”

EAPN Bulgaria: “The concept of inclusive labour market is not clear and it is intentionally avoided. The improvement of the employment services is restricted to uniform information system and provision of services at one stop shops.”

³⁹ See pages 9-10.

⁴⁰ See page 6, Recommendation 4.

EAPN Italy: “The NRP focuses on developing an efficient labour market able to compete in the global economy, while nowhere is it taken into account the need to create an inclusive labor market, which serves people and not vice versa.”

3.3.2 Compulsive activation through cuts and sanctions

Although Active Inclusion should be the reference framework for meaningfully supporting people to access quality jobs, as referred to in the European Platform Against Poverty⁴¹, most countries seem to continue to pursue narrow, highly punitive, activation strategies. The general trend of the NRP is reported to be in the direction of tightening eligibility, duration and coverage of benefits, while the overarching priority remains to get people into any kind of employment, at all costs, and off welfare. In Denmark, the coverage period is reduced. In the Netherlands, tax reimbursements for single breadwinner households will be diminished, as a means to stimulate nonworking partners, as well as benefit claimants to get back into work. In Estonia, benefits will be closely related to a person’s active search for a job.

EAPN Netherlands: “The message seems to be: making people poorer will stimulate them to look for a paid job.”

EAPN Belgium: “Actually, reading the text, we are left with the impression that we are preparing to wage war on the unemployed! The importance of reaching a quantitative employment rate means an evolution towards a severe, punitive activation policy... where people experiencing poverty are often forced to finally accept just any job.”

EAPN UK: “Welfare reform will entail the creation of a single universal back to work benefit, Universal Credit (UC), which most people who are not in employment will receive. This has been designed on the basis of ‘making work pay’, that is that people should always be better off when they move into employment... Even before the introduction of UC we are seeing a significant tightening of the benefits system. One of the most controversial has been the gradual transfer of all people claiming disability benefits onto the ‘active’ benefit Employment Support Allowance. New medical tests have ensured that many people previously regarded as unable to work are now seen as being fit for some kind of work or re-training (although a high proportion of these decisions are overturned on appeal.)”

EAPN Portugal: “The NRP specifies that the reintegration process into the labour market will be made more effective and demanding, which means specifically: limits to the situations in which the unemployment benefit can be claimed and job offers rejected.”

3.3.3 No smooth access to training for vulnerable groups!

Providing training opportunities to facilitate access to the labour market is highlighted as an explicit priority in many NRPs, in accordance to Guideline 8⁴² (BE, NL, BG, FR, DK, DE, IE, LT, PT), complementary to efforts outlined in the Flagship Agenda for new Skills and Jobs⁴³ and in line with the Joint Employment Report.⁴⁴ Some members welcome the fact that their Governments plan to reach specifically those groups who are most in need, such as the long-term unemployed (FR, BE), the low-skilled (FR, BE, PT, EE), those coming from disadvantaged areas (FR) and people with disabilities (EE).

⁴¹ Ibidem.

⁴² “Quality initial education and attractive vocational training must be complemented with effective incentives for lifelong learning, second-chance opportunities, ensuring every adult the chance to move one step up in their qualification.”

⁴³ See Chapter 2.

⁴⁴ See pages 7-9.

EAPN Portugal: “A good practice is the professional re-training of 20.000 unemployed that is proposed, oriented to 100 strategic professions included in the National Qualifications Catalogue. Another positive measure is the signing of protocols with employer associations and trade unions where there is the greatest mismatch between job supply and demand, and to foster the recruitment of unemployed people. Equally, the envisaged qualification of the unemployed with low and very low qualifications in the Basic Skills Programme is welcomed.”

EAPN Germany: “The Federal Government agreed a draft bill for a requirement for a transparent and fast acknowledgment procedure for professional qualifications acquired abroad.”

But despite the commitments, some EAPN members (IE, BE, NL, BG) highlight a number of shortcomings in the implementation of positive training approaches, as well as deploring the lack of concrete measures and a more strategic approach. EAPN members suggest that a missing dimension is a thorough review of existing services and mechanisms, assessing to what extent they are actually effective in reaching excluded groups (FR, DE, IE, SE). There is a particularly pressing need to take urgent action for the recognition of the qualifications, skills and potential of the non-EU immigrants.

EAPN Bulgaria: “Some measures for lifelong learning are envisaged, but they don’t differentiate between excluded and included.”

EAPN Denmark: “There are some elements touched upon in the NRP. Not developed and specified. Only improved skills for reading, writing and arithmetic for long term unemployed is mentioned.”

EAPN France: “We have explicitly demanded that the existence of the service which provides personalised support towards training for the unemployed be recognized in the NRP, at least to highlight its importance and to give it official recognition. This could not be obtained, which raises doubts about the importance attributed to this service and its hopes of survival.”

3. 4 The way forward towards inclusive labour markets

3.4.1 Some positive steps...

A number of networks highlight some positive initiatives taken in the field of strengthening inclusion and supporting vulnerable groups towards the labour market, as recommended by Guideline 7⁴⁵. There are also many welcome references in this sense in the Flagship Agenda for New Skills and Jobs⁴⁶. Some countries are developing more integrated strategies for tackling both unemployment and inclusion in a holistic way.

EAPN Portugal: “The NRP refers to measures that create conditions to accompany the unemployed people in job interviews, and the promotion of sector agreements between Public Employment Services and business associations. The rationalization of the training centres’ network will also be strengthened.”

EAPN Poland: “Other proposed measures without clear target group are: more competition in employment services, collaboration between public and non-public employment services and

⁴⁵ “Employment services should be strengthened and open to all, including young people and those threatened by unemployment with personalised services targeting those furthest away from the labour market.”

⁴⁶ Cf. page 5: “Public Employment Services (PES) should provide career guidance and well-targeted and adapted training and work experience programmes”; page 6: “individual job counseling, job search assistance, measures to improve skills and employability”; page 7: “employment services can play a more comprehensive role as lifelong service providers, delivering services in skills assessment, profiling, training delivery, individual career guidance and client counseling (workers and employers), matching people to job profiles, and offering services to employers, as well as catering for the challenges of those furthest away from the labour market.”

social assistance services, tax-transfer system with incentives to employment, improving labour force mobility.”

EAPN Spain: “Objectives include: giving priority to people's needs as the focus of active employment policy, offering individual and personal attention to improve their employability, improving the services that the employment services provide to employers, helping to improve their competitiveness, promoting entrepreneurship, as well as improving the services and support offered by the employment services to entrepreneurs who are starting out, enhancing the link between active employment policies involving the unemployed and the benefits of the unemployment protection system, advancing in effective equality between women and men in employment, helping to shape the new economic and production model and a better quality, more efficient labour market. Another factor that could be helpful (we'll see in due time) is the future development of a Spanish Employment Strategy, which dovetails with the Europe 2020 Strategy and will be specified each year in the Annual Plan for Employment Policy.”

3.4.2 Progress toward holistic, integrated approaches?

Several EAPN members highlight that there is a pressing need for holistic, integrated pathway approaches to social and professional integration and participation, especially when dealing with excluded groups, facing multiple obstacles and needing comprehensive support (DK, IE, PL). However, many of these approaches fall short of realizing the full potential of an integrated active inclusion strategy, based on the three pillars. At the same time many of the NRPs focus on increasing flexicurity, but with greater emphasis on flexibilisation of contracts and conditions, at the same time as they take steps to undermine security. Members stress the need to invest in decent income schemes that provide people with the necessary security to look for employment, and expand social safety nets to include all, especially those already facing hardship and exclusion because of unemployment or unsustainable, poor quality work (IT). Punitive legislation and increased conditionality is only making people more discouraged, while pushing them further away into poverty and exclusion (SI, UK).

EAPN Ireland: “An Integrated Jobs Strategy that explores all elements of the labour market is urgently required: one that would ensure that the education and training options offered to unemployed people and other welfare recipients are relevant and meaningful.”

EAPN Poland: “If flexicurity is the aim, where is the security part of that? Our unemployment benefits system is not generous: from 1, 1 million registered unemployed only 192,000 (17%) are entitled to benefits (IV quarter of 2010 data). It is determined as a lump-sum, with no regard to previous wage, and with decreasing levels over time (basically, eligibility duration is only 6 months). The conclusion is that we have great flexibility with very small employment and social security.”

3.4.3 But much uncertainty about results...

The revision of draft NRPs in the Europe 2020 Progress Report (published in January as part of the Annual Growth Survey) called for concrete measures, setting out implementation frameworks, and not just vague proposals⁴⁷. And yet, an overwhelming majority of EAPN networks (ES, SK, NL, LU, DE, DK, BG, AT, SE, SI) report that their NRPs do not contain any substantial policy proposals, which would effectively ensure that employment provides a safe route out of poverty and exclusion. In some countries (IT, SI), the measures referenced have already proved unsuccessful and have not

⁴⁷ Page 11: “The policy actions often refer to channels through which the challenges could be addressed rather than to concrete measures [...] The list of measures however often included already implemented measures or measures that are already quite advanced. Planned policy action was often presented in rather vague terms, with little details on the precise nature of the measures, the implementation timeline, the expected impact, the risk of partial or unsuccessful implementation, the budgetary cost and the use of EU Structural Funds.”

yielded the expected results, according to our members. Despite a number of potentially positive elements contained in the different NRPs, some networks (PT, RO) expressed disbelief that such policies will actually be implemented successfully, especially in times of budgetary restraints and fiscal consolidation. This makes it very difficult to correctly assess the worth and efficiency of the proposals. Governments need to promote innovative solutions, looking also at what works on the ground, instead of going forward with announced measures which have proved ineffective. Various countries (BE, DK, IE) would like to see Active Inclusion as a cornerstone of employment policies, and not just mentioned in passing under the Poverty pillar.

EAPN Austria: “The policies proposed are mostly a pretty eclectic collection of measures that have been implemented (and submitted to be included in the plan) by regional or local governments and various ministries... A real strategy is missing, no red thread can be followed.”

EAPN Italy: “Furthermore, we reiterate that the NRP is the presentation of "lines of intent" with no concrete proposals or specific programs or projects to be implemented and that the plans the NRP refers to are just as empty of programs or concrete proposals.”

EAPN Poland: “The NRP points only to central government commanding documents (programs, strategies), amendments to the existing law and implementation of it, and a few new acts.”

SUMMARY OF MAIN MESSAGES

1. **The employment target is sufficiently ambitious, but severe doubts on implementation.** Will it merely serve to force vulnerable people into poor jobs, breaking the synergies between the employment and poverty target?
2. **Overall focus on pushing people into jobs that don't exist by hardening activation,** increasing sanctions and supply side measures, with limited proposals on job creation and other demand side measures.
3. **Quantity of jobs is prioritized over quality,** increasing precariousness of the labour market, low wages and flexi-insecurity, likely to increase in-work poverty.
4. **Limited recognition of the role of social economy** to support excluded groups into quality work and contribution to meeting poverty and employment targets.
5. **Some positive steps are noted towards inclusive labour markets,** particularly with increased attention to personalized job-seeking services, but falls short of an integrated Active Inclusion approach.

4. Inclusive Education and Training Policy

Europe 2020 Integrated Guidelines

Guideline 9: Improving the performance of education and training systems at all levels and increasing participation in tertiary education

4.1 The heterogeneous target

An overview by EAPN networks of the educational targets selected by Member States in the last National Reform Programmes (NRPs) under Europe 2020 reveals great disparities between countries and their starting points.

Regarding early **school-leaving**, some Governments (AT, BE, BG, EE, IE, NL, CZ, SI, PL, SK) considered the European target (reducing early school leaving to 10%) as too weak and went further, in proposing even lower national targets, with the notable examples of the Czech Republic (5.5%), Slovenia (5%) and Poland (4.5%).

But these networks signal that, precisely because the national drop-out rate is already quite low, below the European ambition, Governments are not aiming to further reduce school-leaving, but interpreted that their work is done and no further investment in the matter is needed. Targets are related to sets of policies already in place, while the NRP does not contain new measures to address the problem.

In Italy, however, the status quo means dropout rates of almost 20%, which is the double of the European objective, while in Spain and Portugal rates are even 30%. Given this starting point, our networks consider that even national targets that fall short of the European target are ambitious enough. Other countries (SE, DK, DE, LU, RO) stay within the proposed European target. The UK did not set any education-related national target.

EAPN Ireland: “The target is based on the current National Skill Strategy which is reasonably ambitious and due to existing levels of early school leaving is more ambitious than that agreed at EU level.”

EAPN Italy: “The school dropout rate, according to the data issued by the National Institute of Statistics (ISTAT) for 2009 is 19.2%. This places Italy at the fourth-last place of the Member States, after Spain, Malta and Portugal. There are no specific commitments to address the problem of early school leaving. The NRP only sets the Italian target in a range between 15 and 16%, against a European one of 10%.”

EAPN Portugal: “The target set for 2014 is very ambitious. It is previewed a decrease of 4% per year of the dropout rate.”

EAPN Luxembourg: “This is not ambitious, as the official statistics establish a rate of 9% in 2009. But we have a certain doubt about these figures: in 2004 they were at 17% and there is nothing that was done to change these, so why should they be lower 5 years later?”

Our members report that only in some NRPs (BE, DK, IE, NL, SE) are the school leaving targets complemented with targets regarding **completion of higher or tertiary education**. Some countries (LU, PT, ES) have opted for a mid-term evaluation of the target, usually in 2014 or 2015. A new target may be adopted after this date, depending on the situation in the country at that point in time.

4.1.1 But does it reflect realities on the ground?

Regarding both targets mentioned above, a significant number of members (AT, BG, CZ, EE, LT, IT, SK) point out that although national objectives may be set, there is a clear lack of a thorough analysis of the causes of both drop-up and poor educational attainment, whereas concrete policies to address the problems are also missing. EAPN networks report that proposed policies often do not take into account the complex reasons behind poor school performance, and only choose to focus on a narrow range of responses, rather than having a comprehensive approach. While some important issues are mentioned, it is striking that no wrap-around, integrated support for families is mentioned, such as comprehensive intervention to tackle the multidimensional aspects of poverty exclusion or discrimination.

EAPN Austria: “Many studies have proved that the Austrian educational system is highly segregating and that it needs to be reformed – but there is no majority yet for a real change in the system.”

EAPN Bulgaria: “In the NRP there is neither a clear review of the current situation nor clear recognition of the basic reasons for drop outs, that is deep poverty and sustainable exclusion of huge groups of people from the society.”

EAPN Denmark: “Policies do not tackle the underlying social problems, so it is difficult to believe in their effectiveness.”

EAPN Denmark: “No wrap-around social support and understanding of causes.”

4.2 Missed opportunities for addressing early school leaving

EAPN Scoreboard

EDUCATION AND TRAINING/LIFE LONG LEARNING	Score 1-10
8. How far are comprehensive supportive measures proposed to tackle early school leaving ? <i>i.e. personalized support, wrap-around support for families, comprehensive approach dealing with complex difficulties, recuperation mechanisms, 2nd chance, informal or non-formal training through community approaches?</i>	3.68 out of 10

Many EAPN networks (NL, AT, BG, LT, IT, SK, IE, CZ, EE) identify a significant number of missed opportunities and policy gaps to address school drop out, despite ambitious commitments and positive-sounding intentions. Even more worryingly, in some cases, proposed policies are likely to actually increase poverty and social exclusion, while not contributing to the education target (NL, AT). Several members report that the underlying poverty dimension and the social background are not taken into account when defining causes and proposing solutions, and no social impact assessment is carried out on suggested policies. Often the policies seem concerned with reducing the number of children counted as early school-leavers, rather than solving the problems themselves. Insufficient attention is given to providing integrated approaches between the school, the young person, their family and the local community, linking prevention methods, including a focus on early learning, early-warning and individualized support mechanisms within the formal school system (no child left behind approaches) (FI) linked to new approaches to engage early school leavers again in education through alternative methods – non-formal and informal settings, as well as 2nd Chance schools. There is a striking lack of focus on fighting discrimination and ensuring equal access and treatment in education, in school and beyond, particularly for migrant children, while investing in disadvantaged neighbourhoods and regions remains a challenge.

EAPN Austria: “Some policies enforce stereotypes and overlook the interdependence of lack of basic education with lack of income and a specific social background... There are some positive initiatives but the big problem is the lack of general reform of an educational system that contributes to broadening the gap between poor and rich.”

EAPN Italy: “The problem of social exclusion and poverty of boys and girls is not taken into any account. The question of early childhood education is neglected. There is no mention of specific actions to be developed in the most disadvantaged neighbourhoods of our cities or for the young that are at risk of poverty and social exclusion. No mention of how to implement programs for integrating foreign children and young adults in our school system.”

EAPN Czech Republic: “The early school leaving of children coming from disadvantaged background (as well as Roma children) is still growing.”

EAPN Estonia: “Regional important support services (school psychologists, logopedists) are missing. Schools and child protection workers don't collaborate enough. Parents are not involved as partners into school life. There is a desperate need for student homes for basic school students.”

4.2.1 Insufficient positive steps

When asked to report about examples of good practice in the NRPs regarding inclusive education policies, which can prevent as well as tackle school drop out and promote equal opportunities for all children, a significant number of networks stated that there were none (BE, BG, DK, PL, SE, ES, UK). Some members, however, have pointed out some welcome proposals. Unfortunately, most are small, isolated initiatives, or stated intentions, rather than actual integrated strategies to promote inclusion and equal opportunities to quality education. Key success elements include the establishment of an explicit strategy for an inclusive education system, based on a universal education service delivering equal opportunities to all groups, and closer working between tertiary education, schools and non-formal institutions to ensure an inclusive pathway to higher education and lifelong learning, as well as to decent jobs.

EAPN Czech Republic: “Good practices are: mention of the risk of a gap between poor and rich and increasing of differences in pre-school and primary education system; one of the strategic aims is also the transformation of the Czech education system towards higher level of social inclusion (empowerment of competences of teachers to educate children with specific educational needs).”

EAPN Ireland: “There is a focus on the programme entitled Delivering Equality of Opportunities in Schools (DEIS) which is the national action plan for educational inclusion and focuses on the needs of 3-18 year olds from disadvantaged communities. This is a positive programme. The NRP mentions a current review of DEIS but it is not clear how the programme will be developed into the future... The NRP does name the new one year free preschool year which is an important development and replaced the early childhood payment for all children under 6 years.”

EAPN Austria: “One of the positive examples is a higher investment in basic education, including literacy programmes – it is however ambiguous that these programmes are mostly targeted at migrants; this enforces stereotypes and overlooks that interdependence of lack of basic education with lack of income and a specific social background. In some places social work at school has been introduced and there are good results – but this certainly needs to be extended across the country. There are also some attempts to increase the number of all-day (full-time) schools.”

The majority of EAPN members (BE, NL, BG, PL, LU, DK, SK, SE, SI, EE, IT) however highlight that there is a striking lack of concrete plans, just a list of measures which are known and, in some cases, have proved already to be unsuccessful. Other governments also seem more intent on making

changes to the reporting system, in order to reduce the number of children reported as dropping out of school (BG).

EAPN Poland: “In the NRP part concerning that problem we have only very generally described measures e.g. improving access to preschool education, enhancing media and culture education, modernization of occupational education, improving teachers’ skills, development of early intervention. Many of them could have some impact on early school leaving but without some details they are only slogans.”

EAPN Bulgaria: “The usual choice of the policies is to put pressure on parents and families in order to report statistically less drop outs.”

4.3. Access to lifelong learning for excluded groups not addressed!

EAPN Scoreboard

EDUCATION/TRAINING	Score 1-10
9. How far is effective life-long learning backed , with support to informal/non-formal methods? i.e. <i>support for education/training throughout the life cycle, supporting professional, personal and community development, eg ensuring access to education to excluded groups.</i>	3.31 out of 10

The vast majority of EAPN networks (BE, CZ, IT, DK, DE, NL, PL, SK, SI, ES, SE, UK) report the shocking absence of references and policies aimed at supporting vulnerable groups, including people experiencing poverty and social exclusion, to access quality lifelong learning. When policies do exist, they are designed mainly from a labour market perspective of improving productivity and reducing inactivity, rather than implementing a holistic, rights-based approach to education and training, aimed also at personal development and at fostering social participation and inclusion. No recognition is given to the need to provide alternative pathways for people often alienated from the formal education process: investing in non-formal as well as informal education and training methods and contexts and ensuring validation of experience/qualifications.

EAPN Netherlands: “No mention whatsoever of access for excluded people to lifelong learning.”

EAPN Poland: “There are no references to life-long learning in that part of NRP. It was mentioned only once in the context of modernising labour markets.”

EAPN UK: “There is some discussion over skills policy but this makes almost no reference to excluded people (and even that is a generous assessment).”

EAPN France: “The malfunctioning of the system of access to training for the unemployed is not analysed in the NRP. We can’t see any direction of progress for the upcoming years. Yet, it is a very important issue for many people who wish to recover their professional inclusion potential, especially when they are faced with an obligation to undergo professional reconversion.”

On the bright side, a few members signal some positive practices mainly related to making progress towards inclusive integrated life-long learning strategies and reinforcing equal opportunities for vulnerable groups.

EAPN Ireland: “Regarding tertiary education, the NRP mentions a number of strategies in place for increasing the access to and participation rates of under-represented and disadvantaged groups. The National Plan for Equity of access to Higher Education 2008-2013 is specifically mentioned which focuses on disadvantaged students, mature students and students with disabilities.”

EAPN Luxembourg: “There has just opened a so called school of the second chance. Whether this will be successful has to be monitored in the coming years.”

EAPN France: “Regarding lifelong learning, only the learning process sees significant progress, but mostly concerning initial education.”

EAPN Lithuania: “A positive measure is upgrading the training and education support infrastructure for socially vulnerable groups, the disabled and individuals with special training needs, and developing the range of services offered to them.”

Even when good intentions exist on paper, there is clear evidence of not enough background research and a holistic understanding of the issues, or proposed measures are positive, but insufficient. There is no comprehensive assessment, carried out together with the intended policy beneficiaries, people experiencing poverty and their organisations, into the needs of different groups at different stages of the life cycle and in relation to the educational system, so that effective, integrated policies can be developed to address them.

EAPN Belgium: “Except for rendering professional training more attractive, there are no measures aimed at adapting the school curricula to the requirements of diversified learning.”

EAPN Slovakia: “In fact, there are no special policies in this field, only bottom up initiatives.”

EAPN Sweden: “Many of the policies will probably have a negative effect for those with problems in school.”

EAPN Estonia: “Measures proposed are not enough.”

4.4. Where will the funding come from?

EAPN members are sceptical that appropriate financing will be made available for the successful implementation of policies, as current times are marred by harsh austerity measures and tight European commitments to reducing public deficits, including to education systems⁴⁸. Despite the fact that the European Commission has repeatedly urged Member States to invest in Education and Training, EAPN members report that budget cuts have not spared the education sector, as indicated in our response to the *European Agenda on New Skills and Jobs* and in the *EAPN Report on the social impact of the Crisis (2011)*.

EAPN Ireland: “Not sure how cuts will impact on proposed measures. In the past two years there have been cuts to the supports towards supporting children from certain groups to remain in mainstream education. This includes Travellers and children with special needs... The NRP does not address this and other cuts and the possible impact on their educational outcomes, plus the pressure that the lack of resources to support for these children places on the teachers and schools. This also undermines an important principle of integration.”

EAPN Italy: “To be underlined that there is a mention in the NRP of the total budget allocation and that “the operational mechanisms are being defined” (in: enclosed grid, annexes). The reality, unfortunately, is that with the latest reform public schools and universities have undergone very deep cuts that have resulted in fewer classrooms, fewer school hours, fewer services, fewer teachers, fewer scholarships for deserving students. There is no mention of investments for the right to study, and the actual resources available for scholarships to deserving or disadvantaged students are not quantified.”

EAPN Slovakia: “There is insufficient financial backing for these policies.”

EAPN Portugal: “This vagueness together with the absence of a budgeted impact points out to the risk of these objectives being accomplished more through a process of decreasing the educational quality standards (i.e. making it more difficult for the teachers to hold back pupils that didn’t achieved the pedagogical objectives), than by supportive measures to tackle early

⁴⁸ See also Chapter 6.

school leaving (i.e. personalized support, wrap-around support for families, recuperation mechanisms).”

SUMMARY OF MAIN MESSAGES

1. **There are large disparities in relation to the target for school drop out, with few concessions to countries’ starting point.** Where initial rates are high, a less ambitious target is necessary.
2. **Lack of analysis of causes, including poverty and social exclusion,** and a tendency to try to reduce reported number of children counted as school drop outs.
3. **Lifelong Learning is treated primarily as a labour market instrument, rather than a holistic, rights-based approach** to education and training, linked to personal development.
4. **Insufficient priority given to integrated approaches** linking young people, families and the community, nor focus on early-learning, early-warning and individualized support mechanisms, or targeted support for young people who have left early with informal and non-formal, and 2nd chance provision.
5. **Some positive examples emerge that strengthen a universal education and training system, based on life-long learning principles,** with targeted approaches for the needs of specific groups, including migrants. However, such measures are being severely undermined by public expenditure cuts.

5. Mainstreaming Gender and Discrimination

5.1. Fighting discrimination is not a priority

EAPN Scoreboard

GENDER, DISCRIMINATION AND EQUALITY	Score 1-10
16. How far are policies proposed to tackle discrimination and inequalities in access to jobs, training, services and benefits and to promote greater equality? <i>Is discrimination against key groups recognized and mainstreamed to guarantee access to rights?</i>	2. 47 out of 10

EAPN members report that issues connected to gender equality and anti-discrimination policies are largely missing from the National Reform Programmes (NRPs) (AT, DK, EE, IE, IT, NL, PL, SI), as indicated by the scoreboard above. Where measures are proposed, they are mainly focused on employment, rather than an integrated approach to social inclusion – assessing the obstacles to rights, resources and services.

In Belgium, there is only one mention of fighting discrimination in employment in the Brussels regional plan, while the rest of the document stays silent on the subject. EAPN Bulgaria points out that discrimination is very often based on poverty, namely, of vulnerable groups (Roma, women etc) who suffer double stigmatization or multiple discrimination because of their social condition. However, this dimension, and the link between discrimination and poverty⁴⁹, is not present in the NRP. This is all the more worrying as recent austerity measures have been targeting migrants⁵⁰ moving even more of them into poverty.

In the very few cases where discrimination is addressed (CZ, PT), it becomes rather a shopping list of beneficiaries (ethnic minorities, foreigners, people with disability, the elderly, migrants, LGBT...), accompanied by neither a clear diagnosis of the challenges nor substantive, concrete measures to address their situation.

EAPN Austria: “The aim to introduce better measures to prevent discrimination of women and other disadvantaged group in the labour market is mentioned – and a number of measures are mentioned, but real strategies are missing.”

EAPN Belgium: “Reference is made to this old measure where employers can receive a subsidy, but they get to keep it even if they don’t reach the diversity objective. This is the only quoted measure.”

EAPN Bulgaria: “There are very high levels of discrimination towards people experiencing poverty.”

5.1.1 Missing migrants and ethnic minorities, including the Roma

Strikingly, most NRPs reviewed by our members do not contain provisions referring to the inclusion of migrants or ethnic minorities! Both Guidelines 7 and 8 speak explicitly about the integration of migrants and the need for more targeted policies for them, while the Flagship Agenda on Skills and Jobs dedicates ample space to migrants and ethnic minorities, including the Roma. The European Platform against Poverty, drawing on the existing priorities of the Open Method of Coordination on

⁴⁹ The link between migration, discrimination and poverty has been thoroughly explored in, EAPN (2010): [Migration & Poverty, Report of EAPN’s Conference](#).

⁵⁰ EAPN (2011): [Is the European project moving backwards? The Social Impact of the Crisis and the Recovery Policies in 2010](#).

Social Protection and Social Inclusion also clearly stresses that “achieving the Europe 2020 objective of social inclusion and cohesion will crucially depend on the capacity of the EU and its Member States to fit together social and migration policies.”⁵¹ Despite these positive references, few networks report that their NRPs mention the integration of migrants. Only one country of those reviewed (Italy) mentions the integration of migrants and only one the existence of ethnic minorities (Denmark). While presumably striving to ensure inclusive labour markets, Governments do not seem to feel that fighting discrimination and ensuring a better participation and inclusion of migrants and ethnic minorities can play a role. This is particularly worrying also in the context of the recent adoption, in April this year, of the EU Roma Inclusion Strategy.⁵²

EAPN Belgium: “Young people of migrant origin don’t have equal opportunities in the labour market, despite having successfully graduated and having thorough knowledge of the local language, as they were born here. There are no concrete measures to overcome this obstacle, which is rooted especially in discrimination by employers on the labour market.”

In some NRPs (DE, LU), groups facing specific problems are not mentioned at all. In others (IT, NL), although vulnerable groups are mentioned, the strategies and measures that would support their inclusion are lacking.

EAPN France: “There are foreseen mechanisms for people whose disability is recognized, but nothing is said about supporting people whose disability is not recognized, which sets limits for a very institutional approach of issues to be tackled.”

Overall, discrimination is not dealt with in a comprehensive way, and this dimension is not mainstreamed in the NRPs, according to our members’ assessment. When some scant references exist, they don’t cover all discriminated groups (usually, only one or two are mentioned), and they don’t cover all fields of discrimination – most are focused on employment and education, with no references to access to services, adequate minimum income, or access to decent wages. This tends to confirm the vision of seeing migrants only as economic units rather than adopting a right-based and inclusive approach towards them. Our members report that, as is the case with other parts of the NRP, the accompanying measures for age- and demography-related issues are missing, or they are deemed formal and lacking in substance, or a repeat of already existing measures (AT, BE, BG, IT). EAPN Bulgaria deplores not only the lack of policies, but also of thorough analyses into structural factors and the real nature of the problems to be addressed.

5.2. Getting women into the labour market is the only concern

EAPN Scoreboard

GENDER AND DISCRIMINATION	Score 1-10
17. How far is gender equality promoted? i.e. <i>policies to ensure women have equal access to rights, resources and services.</i>	3.00 out of 10

The gender dimension is also reported by most of our members as largely absent in the NRPs, only scoring of 3 out of 10 in the above assessment. When gender issues are mentioned, they are most often in connection to increasing female participation in the labour market (IT, NL, PT, RO, ES). However, surprisingly few actually spell out concrete policies on how to achieve this. When specific

⁵¹ The implementation of the recent European Agenda for the Integration of Third-Country Nationals (20 July 2011) outlining the challenges, recommendations and areas of action will only be successful if Member States re-think their current model of migrants’ integration towards building integrated and multicultural societies.

⁵² COM (2011) 173 final: [An EU Framework for National Roma Integration Strategies up to 2020](#), 5 April 2011.

measures are indeed proposed, they are formulated with a view to increase productivity and combat demographic change, rather than promoting rights-based, comprehensive approaches, tackling discrimination and ensuring a proper balance between private and family life. Single mothers are specifically mentioned as a vulnerable category by a few countries (DK, IE, NL), but again, concrete provisions are lacking.

EAPN Italy: “The NRP also emphasizes the need to raise the employment rate for women (Programme 2020 for the inclusion of women in the labour market) through active policies, but it remains far from clear what “active policies” are supposed to be.”

EAPN Ireland: “The NRP also highlights that it is taking steps to make the current provisions for One Parent Families less passive. There is no detail on this but measures are currently being taken by the Government.”

5.2.1 A proper work/life balance

Guideline 7 specifically mentions the need for Member States to implement provisions supporting a better reconciliation between private and professional life.⁵³ Some networks report welcome concrete steps in the direction of ensuring a better reconciliation of the two (AT, IT, ES, PT, BE), by means of enhancing the availability of childcare and by supporting more flexible work. Sadly, these countries seem to be a small minority, and crucial issues, such as the affordability of childcare or the more equal distribution of caring responsibilities in the household are not addressed, while there is also uncertainty about the ability to implement these policies in times of austerity cuts. Also, balancing work and private life is reported to be seen as a “women’s problem”, and not an issue that should concern the overall organisation of our societies, involving men and women alike. The Portuguese NRP recognizes the importance of social support to families in the NRPs, but does not speak of any measures to support childbearing, and there are no clear policies on how to foster equal treatment.

EAPN Poland: “The recently enacted law on childcare for children under 3 years old is a step in good direction, but in times of budgetary restrictions, it is difficult to achieve big improvements (in 2008 enrolment rate in Poland was 7,9% when the average for the EU27 was over 29% (OECD data).”

EAPN Czech Republic: “A good policy is increasing the variety of supply of child care.”

EAPN Netherlands: “The only measure that they will take is to improve the participation of women on the labour market. Nothing about equality.”

EAPN Italy: “We wonder why policies of reconciliation are always and only aimed at women.”

5.2.2 Tackling the gender pay gap

Some more positive developments are prioritizing the gender pay gap in a number of countries (AT, BE, BG, EE, PT, ES, IT), improving availability and access of childcare facilities (DE, IE), and generally providing for a better reconciliation between private and professional life (AT, IT, ES, PT, BE). Some countries also mention promoting women in leading and decision-making positions (DE, PT, SI, ES).

5.3 No country for old men and women

⁵³ “Work-life balance policies with the provision of affordable care and innovation in work organisation should be geared to raising employment rates, particularly among youth, older workers and women, in particular to retain highly skilled women in scientific and technical fields.”

EAPN scoreboard

GENDER AND DISCRIMINATION	Score: 1-10
18. To what extent are approaches to demographic change and active ageing , as well as solidarity between generations, respectful of human dignity, instead of viewed strictly from the economic competitiveness perspective?	2.23 out of 10

Most EAPN members could not refer to real positive policies included in the NRPs, dealing with demographic change or active ageing, even if these issues might be mentioned in the text (AT, BG, CZ, DK, DE, IT, IE, LU, PL, SK, SI, ES). This is in blatant contradiction with the goals of establishing inclusive labour markets and combating poverty and social exclusion, as well as building inclusive and socially cohesive societies, where people can live in respect and dignity. This is missed opportunity also in the context of the upcoming European Year on Active Ageing and Solidarity between Generations (2012)⁵⁴.

When active ageing and/or the demographic change are mentioned in the NRPs, our members report that it is done primarily from a labour market perspective, with the sole aim of increasing competitiveness and reducing burdens on public budgets. A very worrying development are the measures aimed at raising the participation rate of older workers by means of increasing the retirement age (AT, BE, BG, EE, PT, ES, IT), effectively forcing people to work (and contribute) for more years, regardless of the stressful/demanding nature of the job, health impact, nor whether employers will actually retain them in employment until this later age.

Regarding the fight against age-based discrimination, few NRPs are reported to include measures aimed at encouraging the re-hiring of older workers who have lost their jobs, or pro-active support to companies to retain workers, or support for life-long learning. This approach is likely to result in increasing poverty, as older workers lose their jobs, but are not able to access their pensions until a later stage. This is particularly a concern for workers in low-paid jobs and difficult physical conditions.

EAPN Belgium: “Adapted work is needed for older workers.”

EAPN Estonia: “For those above 50-years old, it is almost impossible to find a job, unless you're a good specialist. The government talks publicly about old people as a burden for society and to the state economy.”

EAPN Slovenia: “The government proposed a reform to raise the retirement age, but this reform was rejected in the referendum on the 5th June 2011.”

5.3.1 Some positive steps for youth!

On the other side of intergenerational solidarity, Guideline 8 specifically mentions investment in young people⁵⁵, while the Flagship Initiative Youth on the Move provides a clear framework reference to supporting youth into education and employment, especially given the soaring unemployment rates of young people. Unsurprisingly, quite a number of NRPs reviewed by our members refer to combating youth unemployment (DK, IT, PL, PT, ES, EE, LT).

⁵⁴ See more information [here about the European Year](#).

⁵⁵ “To support young people and in particular those not in employment, education or training, Member States in cooperation with the social partners, should enact schemes to help recent graduates find initial employment or further education and training opportunities, including apprenticeships, and intervene rapidly when young people become unemployed.”

EAPN Poland: “Measures for youth are intended to encourage earlier-starting career and better adjustment of the educational system contents to the goal of shortening search for job time.”

EAPN Portugal: “Social protection for interns is increased, to ensure them the same social security coverage as employed workers.”

EAPN France: “An important effort is made to facilitate the transition from the education system to the world of work, including a strong emphasis on apprenticeships, with increased support for SMEs offering them.”

EAPN Lithuania: “The project “Be Active in the Labour Market” is aimed at increasing youth employment.”

Spain is the only reviewed country which dedicates ample space to youth unemployment in its NRP, reflecting its high unemployment rates for youth (over 40%) and proposing concrete measures.

EAPN Spain: “There is a specific point made with regard to unemployment of young people and other groups, aimed at improving the policy of Social Security rebates for permanent contracts, making it more rigorous and selective, with special attention to young people with special problems of employability and long-term unemployed individuals over 45 years old. The amount of the bonus is increased in the case of women, maintaining the existing bonuses for victims of domestic violence, and people at risk of social exclusion. The regulation on training contracts has been changed to include a full subsidy for social security contributions, while also improving the wages and the unemployment benefits upon termination. The requirements that a young worker must comply with so as to qualify for an internship contract have been changed to include professional certificates, and the qualifying period has been extended to five years following graduation. A subsidy is provided for converting these contracts.

SUMMARY OF MAIN MESSAGES

1. **Gender equality and fighting discrimination is notably absent from most NRPs.** Particularly noticeable is the lack of measures to support migrants and ethnic minorities, including Roma, despite commitments in Europe 2020.
2. **There is a significant lack of an integrated rights-based approach to discrimination, investing in universal services,** diagnosing specific obstacles to equal opportunities and proposing solutions for women and other discriminated groups.
3. **Gender equality is almost entirely seen as an issue of labour market integration, despite some progress on gender pay gap.** Concerns with work/life balance show some increase in childcare, but insufficient attention to affordability or quality of provision, or distribution of household tasks.
4. **Active ageing is more prominent, but focused mainly on raising retirement ages,** with little concern for social and health impact on people in poor or physically strenuous jobs, or pro-active measures to keep older people in work, or re-employ them.
5. **Greater attention is given to young people,** with a particular focus on education and access to employment, but insufficient to deal with the growing needs.

6. Using Structural Funds for Social Inclusion

As clearly stated in the fifth Cohesion Report,⁵⁶ Structural Funds have a significant role to play in ensuring a full delivery of all the headline targets of Europe 2020. The European Commission in its guidance paper⁵⁷ underlines that “where appropriate, Member States should indicate how Structural Funds will be used in support of measures to achieve the targets as well as the budgetary impact of these measures.”

However, as demonstrated in the scoreboard below, with an average score of 2.41 out of 10, EAPN members almost unanimously highlighted that Structural Funds fall far short of their potential to promote social inclusion in the National Reform Programmes (NRPs). The majority stressed the absence (BG, CZ, IE, PL, SK) or insufficient mention of Structural Funds (AT, IT, LU, PT, SV) in the NRPs as a way to effectively deliver on social inclusion. Only 3 EAPN Networks (BE, MT and RO) have underlined the positive contribution of Structural Funds in achieving the poverty reduction target, at least on paper.

EAPN Scoreboard

STRUCTURAL FUNDS	Score 1-10
19. How far are Structural Funds used to effectively promote social inclusion (<i>integrated active inclusion approaches, access to quality jobs, education/training and life-long learning, but also access to quality services – including anti-discrimination, gender mainstreaming initiatives?</i>)	2.41 out of 10

Several EAPN Networks have pointed out the lack of relationship between the NRPs and the current ESF and ERDF programmes (AT, LU), except in Portugal where the NRP is closely articulated with the allocation of the National Strategic Framework (NRSF). Apart from stating that the future of Cohesion Policy should be fully in line with the objectives of Europe 2020, the NRPs in general neither detail (DK) nor put forward concrete measures to underpin this strategy. In Italy, the use of Structural Funds appears to be too generic to be properly estimated.

The only measures detailed are ones that are already ongoing and planned (BE) and even only listed in 2011 without any references to the future (PL).

The uncertainties arising from the on-going discussion of the future programming period of Structural Funds are put forward as reasons to explain why Member States do not take further steps to use Cohesion Policy to support the Europe 2020 targets through the NRPs or explain how the Structural Funds will be broken down into these targets (BE, CZ, EE).

6.1. A limited role given to Structural Funds to deliver on the social targets

Overall, most EAPN networks have complained that the use of Structural Funds within the NRPs is not sufficiently socially oriented. A big imbalance is noted by many networks in the priority given to hard expenditures such as infrastructure - i.e. highways (BG, IT, PL), innovation & research (PL), energy and climate change (PT). These elements appear to indicate that Member States have primarily put the focus on growth-enhancing expenditures to achieve the targets on R&D and climate change.

⁵⁶ COM (2010) 642 final, Conclusions of the fifth report on economic, social and territorial cohesion: *The future of cohesion policy*.

⁵⁷ Guidance paper from the European Commission to assist Member States in preparing the implementation of the Europe 2020 strategy (July 2010).

As far as the social targets are concerned, the usage of structural funds is unequally shared between the poverty, education and employment targets. EU funding is mainly focused on employment (AT, DE, MT, PL, SV) or education (IE, PT). Although some of these measures are positive, there is not an explicit consideration of how they might contribute to reducing poverty and social exclusion. Almost none of the EAPN networks considered that the amount of money dedicated to poverty and social exclusion was enough (BU, IE, IT, PL, PT, SK, SV).

More worryingly, some of the EAPN Networks have underlined that the usage of Structural Funds could raise poverty by helping to increase economic and social inequalities (BG).

EAPN Italy: “In the Italian NRP, the lion's share is undoubtedly given to new infrastructure and transport (6.813 billion Euros). Another rather generic item includes environmental services (water, waste), tourist services and cultural regeneration of urban and rural areas, further aid to businesses and ... so on and so forth (12.249 billion Euros)... Then, there are 3.868 billion Euros for inclusion measures, 4.354 for education and 3.558 for employment.”

EAPN Germany pointed out that though there are some useful measures, the main fields of Structural Funds’ intervention are solely job-oriented and consist in:

- Increasing the adjustment and competitiveness of enterprises and persons employed (approximately 2.6 billion Euros).
- Improving human capital (approximately 3.2 billion Euros).
- Improving the job market chances and integration of disadvantaged persons (approximately 3.4 billion Euros).

EAPN Ireland: “Within the Irish NRP, there is a section on Structural Funds but within this there is no mention of using them to address poverty and social exclusion. It states that the focus on future cohesion policy will be on Europe 2020 priorities with specific mention of competitiveness and sustainable development. The only relevant reference is to the existing objective of up-skilling and increasing the participation of groups outside the labour market.”

EAPN Portugal: “There is no equal distribution of budget between poverty, employment and education. In the section called “NSRF contribution 2013”, the investment /allocation of money is clearly on Innovation, More and Better Education and Climate and Energy. The other two axes “increasing employment” and “fighting poverty and social inequalities” have a small allocation of money. There is a clear investment in education and training and in measures that could increase employment.”

EAPN Bulgaria: “The current usage of Structural Funds is a poverty generator – it increases inequalities not only of incomes, but in negotiating and influence as well.”

Only 2 EAPN Members emphasize the positive contribution of Structural Funds to social inclusion and poverty reduction measures (MT and RO). However, the lack of concrete detail on the exact distribution of funding, undermines the positive intentions.

EAPN Malta: “The measures that focus on employment seek to address the main challenges prevailing in Malta’s labour market, including low female participation and scope for more active participation by specific segments of the domestic working-age population. The measures include support mechanisms that would enable a greater number of women to remain in the labour force, and enacting changes in the tax rate regime that make female employment feasible. Moreover, as part of its fiscal consolidation stance, Government is opting to expand the community work scheme. Half Malta’s NRP will be funded through Structural Funds.”

EAPN Romania: “Structural Funds will be used to help deliver all social targets including education, environment, growth and R&D in the private sector. However, the exact distribution between targets is not readily apparent.”

6.2 A fragmented use of Structural Funds jeopardizing active inclusion approaches

The European Commission in its Active Inclusion Recommendation gives a clear role to Structural Funds, in delivering Active Inclusion: “Guarantee the relevant resources and benefits under the social protection arrangements; use the provisions and resources of the Structural Funds, in particular the European Social Fund, to support active inclusion measures.”⁵⁸ In EAPN’s view, promoting integrated active inclusion approaches through Structural Funds is one of the best ways to deliver on the poverty reduction target (access to adequate minimum income, decent work and quality services).

Unfortunately, according to EAPN Members, the concept of active inclusion is notably underused in the section on Structural Funds. For many, this concept is simply not mentioned at all (BG, CZ, EE, IE, LU, PL). For others, when active inclusion is mentioned, the measures described have no direct linkage with Structural Funds (AT). Only a very few EAPN Networks have underlined some good will of their Governments to promote active inclusion approaches through Structural Funds (PT, SK see in the box below), but often this good will is not backed by concrete proposals (DE) or it does not enable integrated active inclusion approaches due to a fragmented collection of measures. For instance, in Italy, the measures focus on improving safety, legality and services in the southern part. But there is no word about how to solve the housing problem. No detail is given on how Structural Funds will be devoted to creating access to quality employment. In Belgium, the pillar on a better access to the labour market is the only one considered. In Portugal, the promising approach of integrated local development has not been sufficiently tested to know what impact it will have on poverty and social exclusion of key groups.

EAPN Portugal: “Co-financed by Structural Funds, the Local Social Development Contracts (CLDS) (57 new Contracts should be signed in 2011) consist in a model of management that consider the economic support to projects that are selected by the government, having in mind deprived territories. The axes of intervention are the following: employment, training and qualifications, familial and parental intervention, empowerment of communities and institutions, information and accessibilities. The local social development contracts can be a useful instrument to combat poverty and social exclusion in deprived areas, but so far, there is not enough feedback to say that the results are positive.”

EAPN Slovakia: “The concept of active inclusion is well-illustrated by the example of Roma Marginalised Communities. The concept of a comprehensive (integrated) approach to marginal Roma communities approved in 2002 has become the starting point for setting up the horizontal priority of Roma Marginalised Communities (RMC) for the programming period 2007-2013. Horizontal priority allows combining several programmes of Structural Funds to support comprehensive dealing with multidimensional aspects of poverty in separated and segregated Roma community. However, support for projects of local strategies of comprehensive development that have been prepared and approved under the previous Government, has been now halted. A new programme of support of Community Centres in marginalised communities (there are about 800 destitute neighbourhoods/concentrations in Slovakia and Community Centres operate but in 40 of them) is promised to provide several services for all generations... The aim, in 2011, is to allocate part of the resources from the European Social Fund earmarked for national projects to develop a network of community centres and to create conditions for improving the quality of their activities through a “National Project of Community Centres”. Unfortunately such an initiative is only accessible to big NGOs due to the conditions fixed by the Government. Furthermore, such an integrated active inclusion approach is clearly lacking for other vulnerable target groups.”

⁵⁸ EC Recommendation on the Active Inclusion of People excluded from the Labour Market (3 October 2008).

EAPN Slovenia: “Active inclusion projects are supported but they are intended for non-profit organisations (not just NGOs) – that means that much of the financial support is delivered to governmental and local communities which already have significant state or local financial resources and only the remaining financial subvention is delivered to NGOs.”

6.3 Insufficient support given to inclusive labour market policies

When it comes to promoting inclusive labour market policies, Structural Funds are strikingly absent. According to the vast majority of EAPN Members, the role of Structural Funds in promoting inclusive labour market policies (i.e. gender mainstreaming, promotion of equal opportunities and anti-discrimination initiatives and/ or personalised support towards quality jobs, tackling in-work poverty) is simply not addressed (BG, CZ, DK, EE, DE, IE, IT, PL, SK). When it is the case, it seems more like a rhetorical exercise with few new concrete and detailed measures proposed (AT, PT) and with insufficient resources to make an impact. Quality jobs and tackling in work poverty are not highlighted as a concern (AT). When references to inclusive labour market are mentioned, they are often focused on gender mainstreaming and equal opportunities. Although this is welcomed, it is only one element of building inclusive labour markets⁵⁹.

In Portugal, there is a reference to the specific situation of women related to vulnerability. In Slovenia, several vulnerable target groups are listed (unemployed individuals over 50, Roma and ex-prisoners, long term unemployed, women, first time young job seekers, etc.), but the kind of jobs proposed for them is based on short-term contracts, which are delivered in many cases to governmental and publicly-funded local non for-profit structures. This means that in the end the results are questionable for employees (in terms of gaining new important skills to help them to get a new job and ensure social inclusion: quality jobs that can lead to a quality life).

EAPN Austria: “There are some innovative projects mainly for young unemployed people, but the places offered are far below the numbers needed. E.g. The project “space lap” can take a total number of 700 participants over two years – but about 6.000 people are in need of such a programme in the city of Vienna alone.”

EAPN Belgium: “All the measures funded by the ESF for facilitating the labour market access in the Flemish part are already taken. No new measure has been announced in the future. These frameworks target the young unemployed under 30 years old who did not benefit from a VDAB accompaniment the year before. These people are invited to pass a new evaluation to be oriented towards the most suitable pathway to employment. Each year, 16.500 long or medium-term unemployed benefit from a training offer and a personalized and adapted counselling. Employment workshops have also been set up. These workshops target youth with a more mainstream profile who could not enter the labour market due to the crisis. These people elaborate a group project. These workshops help them to position themselves towards the labour market, get the necessary competences and update them. Group works alternate with placements of 3 weeks maximum. This pathway can last 6 months.”

EAPN Germany: “ESF-Programme “Rückenwind” (tailwind) which is explicitly dedicated to human resources development in social economy aiming at enhancing employability of different vulnerable groups of people. This programme was negotiated by the Federal Ministry of Labour and the welfare organisations.”

⁵⁹ See also Chapter 3.

6.4 A scarce and limited use of Cohesion Policy to support life-long learning and supportive training policies

There is a clear lack of support given by Structural Funds for life-long learning and supportive training and educational policies, throughout the lifecycle, particularly those which are accessible to people outside the labour market. Several EAPN Members pointed out the absence of any reference to Structural Funds in that regard (AT, CZ, EE, IE, IT, PL). Several others stressed a lack of a consistent approach regarding these policies (BG, IT, LU) particularly due to a lack of awareness of the need to invest in in-formal and non-formal education to better support alternative pathways for specific excluded groups, who have found difficulties engaging with formal education and training systems. EAPN Bulgaria highlighted the fact that only formal measures are taken in this field. For the rest, the support to life-long learning measures is not linked to Structural Funds.⁶⁰ In Luxembourg, life-long-learning is funded through an increase of the training fees' amount that employers can deduct from their taxes.

When life-long learning and training programmes receive support from Structural Funds, their effectiveness is in certain cases put into question (SK, SV). EAPN Slovakia deplores a badly targeted approach when it comes to education and training services for jobseekers. "These services are often expensive compensation for an ill-tailored education system... Thus, Government intend to improve cooperation between employers and education institutions in order to prepare "more fitting graduates."" EAPN Slovenia raised several questions related to the effectiveness of Structural Funds projects operating in this field: "do these programs really help participants, how much and in what way? Do participants use and improve their knowledge?"

EAPN Belgium: "In the francophone Community, ongoing projects are mentioned about teaching and training in the framework of the Service Francophone des Métiers et Qualifications (SFMQ - Francophone Service on jobs and qualifications). But, these projects are already in place and not new."

EAPN Germany: "Targets and measures putting learning and educational chances of young (migrant) people, often disadvantaged, are considered as a priority in Germany."

EAPN Malta: "The measure 4.4.2.3 of the NRP – Introducing Life-Long Learning into the Community through a Pilot Out-Reach Programme - is viewed as a good practice. The aim of this measure is to tailor lifelong learning, in the form of various educational opportunities, to the needs of the community, with particular attention being paid to the needs of certain key groups in society where there is much potential for raising of educational levels, such as unemployed mothers and other unemployed persons with low or no skills. The Strategic Educational Pathways Scholarships (STEPS) scheme aims at providing more opportunities to promote further specialisation at higher levels of education particularly at a Masters level."

EAPN Portugal: "The Portuguese NRP expresses a commitment to foster inclusion and reduction of poverty and social inequalities by acting in qualification processes and boosting employment. The National Qualifications System and the New Opportunities initiative will continue to exist and intend to support young people and adults. One of the goals established in the document is that in 2015: Lifelong learning participation rate will equal the European average. They intend also to:

- Prolong professional lives through incentives for the employment of older people;
- Discourage early retirement from labour market;
- Foster gradual transfer to inactivity."

EAPN Romania: "Structural Funds will be used towards reaching targets including life-long learning."

⁶⁰ See also Chapter 4.

6.5. An urgent need to create and strengthen a social-friendly approach

EAPN Networks urge their Member States to adopt an integrated approach for ESF and ERDF Funds to face the multidimensional challenge of reducing poverty and social exclusion and make funds much more accessible to community and social NGOs representing the most disadvantaged groups of people. EAPN Members advocate the following proposals aiming at reinforcing a social-friendly approach to Structural Funds:

6.5.1 Easier and more accessible financing rules for NGOs

NGOs are key grass-root actors providing vital local services, responding to new needs, supporting and voicing excluded groups' concerns. However, significant financial obstacles continue to be encountered by small NGOs (level of co-financing, lack of technical assistance, lack of payment in advance....) that prevent them from accessing EU Funds. The administrative and financial rules of Structural Funds are too complex and need to be simplified to make them open to social inclusion NGOs who can deliver small, effective, on-the-ground projects working directly with people experiencing poverty. To make it happen, financial obstacles should be removed (low level of co-financing, lack of payment in advance....) and a greater use of financial instruments (such as technical assistance⁶¹ and global grants⁶²) is urgently needed. Several EAPN networks are mobilising around these demands.

EAPN Slovenia: "In most cases, there are certain conditions which smaller NGOs cannot meet or only with difficulty: calls with only 40% to 60% state co-financing rate are very difficult to access by NGOs (particularly for small NGOs) so those organisations who are co-financed by Government or local communities are at a great advantage.....The Structural Funds support goes towards supporting those organisations that already have significant financial resources rather than those who do not have financial resources."

EAPN Estonia: "NGOs of Tallin created a network and started with united force to demand involvement in questions of financing NGOs."

6.5.2 Improving Structural Funds' governance

A greater emphasis needs to be put on a stronger involvement and more meaningful participation of social NGOs in the Structural Funds' process. Participation is too often limited to a dialogue between public bodies (DE) without, in many cases, any room left for NGOs (IT). The partnership principle should be fully implemented both at project level (in the design, monitoring, assessment process) and at governance level (through the participation in the decision-making process) especially in their monitoring committees and methods (e.g. monitoring committees, evaluation, indicators) with programme structures and regulations facilitating the implementation of the partnership principle. Effective participation also requires the involvement of a wide range of civil society organisations, representing the target groups, including social inclusion NGOs and people experiencing poverty, as well as anti-poverty networks/platforms (like EAPN), which lobby on integrated anti-poverty

⁶¹ Article 45 of the Structural Funds Regulation provides the following definition: "technical assistance is designed to support the smooth running and management of Structural Funds' operation, for instance by covering studies concerning the operation of the Funds, the exchange of information and experience, evaluation and computerized information systems, but also reaching out to final beneficiaries."

⁶² Article 42 of the Structural Funds Regulation defines the Global Grants mechanisms through the "Member State of the Managing Authority may entrust the management and implementation of a part of an operational programme to one or more intermediate bodies". The use of global grants to achieve the objectives of the European Social Fund is also encouraged by Article 11 of the European Social Fund Draft Regulation.

strategies. Selected through a transparent selection process, NGOs should participate as full members in all the decision-making processes in all monitoring committees (ESF and ERDF) with full voting rights.

EAPN Germany: “It seems that participation is limited to the exchange and the cooperation of public authorities. Other stakeholders can be involved but in fact it is the authorities who are driving this process.”

EAPN Italy: “Civil society is never involved. Everything takes place in hermetically sealed rooms.”

EAPN Austria: “A deeper and clearer cooperation between the relevant ministries and departments is needed.”

6.5.3 A better operating process

EAPN members call for various improvements regarding the operating process of Structural Funds aiming at ensuring that these Funds will make a decisive contribution to the achievement of the poverty reduction target such as:

- More clearly defined and detailed measures and objectives of Structural Funds and their usage (AU, CZ, IT).

EAPN Czech Republic: “A detailed specification of the use of Structural Funds within the implementation of the NRPs is yet to be elaborated.”

- More transparency and accountability with regards to the Structural Funds’ Regulations (IT, SK).

EAPN Italy: “There is no transparency, or reference to specific programs, bearing in mind that the various plans the NRP refers to are very general and unconvincing as well.”

- A better and more socially-oriented evaluation, assessment mechanism to really measure the extent to which projects funded by Structural Funds (ESF, ERDF..) will have delivered on the poverty reduction target through the assessment of their outcomes, outputs and difficulties (BG, PL, SK).

EAPN Bulgaria: “It is high time to reconsider the real results of the Structural Funds and to reformulate the framework so as to be used for real anti-poverty and social inclusion measures.”

- An increased absorption of Structural Funds (RO).
- More social-friendly call for proposals and conditions for small NGOs and more long-term projects focusing on social inclusion and life-long learning (SI).

6.5.4 Promoting integrated Active Inclusion approaches

Structural Funds are not used sufficiently in a comprehensive way to support integrated policy approaches which will reduce poverty and social exclusion. This is even more important in the current context of economic crisis.

EAPN members urge their Governments to use Cohesion Policy to embrace an integrated Active Inclusion approach, covering the 3 components of active inclusion (adequate minimum income, universal access to affordable, quality services and pathway approaches to inclusive labour market).⁶³

⁶³ For more information on integrated Active Inclusion approaches see Chapter 1 and Chapter 3.

Cohesion Policy generally does not address properly the issue of supporting the development of quality services and increasing access. This is a particularly important shortcoming in the context of austerity measures which are currently reducing services, access eligibility and coverage. It is also a missed opportunity to invest in services in order to counterbalance the loss of jobs experienced by vulnerable people. EAPN members stress that Structural Funds should provide:

- Newly innovative solutions that go beyond job-oriented measures (BE) through joined up measures designed to support individualised pathway approaches not focussed exclusively on getting people into a job but moving people along the road of inclusion (building confidence, getting new skills and capacity to engage in projects in their local community). These joined up pathways need to link vocational education, training, counselling, development of soft skills, language courses, frontline services like childcare or transport and relevant community and social support services, as well as ensuring adequate minimum income support. They also need to tackle barriers to inclusion by encouraging local development approaches and improving empowerment skills and capacity-building of excluded people in the context of community development.
- Integrated approaches combining ERDF and ESF should be promoted in order to ensure the provision of quality social infrastructures and services for the most vulnerable groups of people.
- Better infrastructure for supporting vulnerable groups of people. In that regard, EAPN Malta calls for more training and support schemes for social enterprises.

6.5.5 Ensuring support for all vulnerable groups

Structural Funds are currently inadequately targeted to those living in poverty. Some categories are usually missed: such as older people, migrants, people with disabilities, asylum seekers, children and people reckoned unable to contribute to the labour market.

Several EAPN Networks (AU, BE, PT, SK, SV) have highlighted that the targeted approach towards vulnerable groups of people adopted by their Government is often too narrow and incomplete: youth unemployed (AU, BE), unemployed women and unemployed with low or no skills (MT), disabled, homeless, beneficiaries of the SII (Social Insertion Income), unsubsidized unemployed, Roma (SK) are some of the groups that are overlooked.

EAPN Slovenia pointed out that despite various mentions of special target groups (unemployed over 50, Roma, ex-prisoners, long-term unemployed women, young job seekers), these categories of people do not necessarily benefit from effective and long-term social inclusion measures.

EAPN Portugal highlighted the low profile given to Child Poverty, emphasizing that it should be a priority. “We have a huge rate of child poverty and in this context of crisis this phenomena could increase and it is necessary to have measures to protect children from the unemployment of their parents, and from other situations that are related with social and economic crisis (psychological problems of their parents, lack of time to be with the children because some parents have to work in two jobs to pay all the expenses...). The other group that is considered as vulnerable (and not mentioned in the NRP) are older people. In Portugal, the pensions are very small and a large number of elder people experience poverty.”

6.6 Making the best use of the new European Context

As the 2011 NRPs are operating in the double context of the implementation of the Europe 2020 Strategy and especially the European Platform against Poverty and the discussion on the future of Cohesion Policy, it is timely that EAPN members provide their views on how to fully use these new windows of opportunities so as to make Structural Funds a powerful means to deliver on the new EU poverty reduction target.

6.6.1 A better link of Structural Funds with the inclusive growth pillar of Europe 2020 and especially the European Platform against Poverty

Overall, EAPN Members welcome the promising proposals on Structural Funds in the European Platform against Poverty aiming at:

- Increasing the allocation of financial resources to social inclusion and poverty reduction with predictable volumes.
- Facilitating and ensuring a greater use of the ESF for small NGOs through an easier access to global grants ("tailor-made grant schemes") and improving access to funds for groups with multiple disadvantages and at high risk of poverty.
- Better identifying, at Member States' level, groups at risk of poverty so as to dedicate specific funding for actions in this field.

Nevertheless, some **major missing elements** are to be regretted:

- Social inclusion and poverty reduction is not a binding priority for each Operating Programme (OP) or MS but only a possible theme for Member States to support the implementation of Guideline 10. This leaves too much room for manoeuvre for Member States and could weaken the use of Structural Funds for ensuring the delivery of social inclusion projects.
- A more holistic and comprehensive delivery on social objectives through Structural Funds with a particular focus on the commitment to reduce poverty and social exclusion through active inclusion, more and better jobs and strengthened social protection and public services would have been welcomed.
- The transnational dimension of the ESF is also clearly lacking.

EAPN Belgium pointed out the lack of reference to new initiatives referring to Structural Funds in the European Platform Against Poverty and Social Exclusion aiming at simplifying Structural Funds in order to facilitate their uptake by small NGOs dealing with social inclusion policies, at grass-roots level.

6.6.2 What should the Future Cohesion Policy look like?

While the next Structural Funds programming period is being discussed at EU level, many of the EAPN Networks put forward their recommendations for the future Cohesion Policy. Their messages aim at:

- Ensuring a comprehensive and integrated delivery of the social objectives of the EU2020 Strategy by making social inclusion and the fight against poverty a binding priority in all Operational Programmes (OPs) primarily through integrated Active Inclusion approaches.
- The implementation of the partnership principle as a binding requirement in the Structural Funds General Regulation and the availability of global grants and technical assistance resources for NGOs in all Operational Programmes. A minimum proportion of Structural Funds delivered by NGOs should also be established.
- An ambitious budget for Cohesion Policy to match the social targets of the EU2020 and the necessity to mobilize Structural Funds to lift the most vulnerable groups of people out of poverty and social exclusion especially in times of crisis and austerity measures.
- A stronger link between Structural Funds and the new social OMC with National integrated strategies and plans on social protection and social inclusion discussed within the European Platform against Poverty as a basis for Structural Funds proposals focussed on the objective of reducing poverty and social exclusion.
- A social conditionality and incentive system aiming at ensuring progress towards the agreed targets.
- A more social-friendly evaluation system (social outcome indicators and social inclusion proofing system).

SUMMARY OF MAIN MESSAGES

1. **Structural Funds are falling far short of their potential to deliver on social inclusion in the NRPs, with greater focus on growth-enhancing infrastructure commitments** and unequal balance between employment, training and poverty targets.
2. **A clear integrated strategic approach to using Structural Funds to reduce poverty and social exclusion is missing, with a tendency towards policy fragmentation.** There are missed opportunities to embed a comprehensive **active inclusion** strategy, backing support to adequate income support, decent work and quality services.
3. **Even the focus on employment, education and training often fail to ensure inclusion for all at risk groups,** or to back sustainable solutions, throughout the lifecycle.
4. **There is an urgent need to promote a more social-friendly approach:** ensuring easier and more accessible financing rules for small NGOs, improving governance and operation process to ensure meaningful participation of NGOs and people experiencing poverty, promoting comprehensive active inclusion approaches and ensuring targeted support for specific vulnerable groups.
5. **Opportunities need to be seized to deliver on the promises made in Europe 2020 and the Platform Against Poverty** – particularly in making poverty reduction a binding priority and providing guidelines for a more holistic approach, using all funds. A priority must be given to implementing the partnership principle and ensuring an ambitious budget to deliver on poverty and the other social targets. A stronger link with the Social OMC is vital to ensure this delivery.

7. Embedding meaningful stakeholder participation

The Commission's proposals for Europe 2020⁶⁴ underlined the importance of the partnership approach, involving all relevant actors at national, regional and local level, including civil society in the development and delivery of Europe 2020. This partnership approach was given explicit recognition in the Integrated Guidelines (adopted in October European Council in 2010) under Recital 16, guiding the National Reform Programmes (NRPs).

Recital 16 of the Council decision of the 20 October 2010 gives an explicit recognition of partnership with civil society in NRPs (originally 14)

"When designing and implementing their National Reform Programmes taking account of these guidelines, Member States should ensure effective governance of employment policy. While these guidelines are addressed to Member States, the Europe 2020 strategy should, as appropriate, be implemented, monitored and evaluated in partnership with all national, regional and local authorities, closely associating parliaments, as well as social partners and representatives of civil society, who shall contribute to the elaboration of National Reform Programmes, to their implementation and to the overall communication on the strategy."

EAPN Scoreboard

PARTICIPATION	Out of 10
20. How far were anti-poverty NGOs engaged in effective stakeholder dialogue ? i.e. <i>were anti poverty NGOs involved, was this effective and did it have an impact?</i>	2.38 out of 10

7.1 Limited, low quality involvement from Stakeholders, with little impact

The overall rating for effective participation on the NRP was scored as "very low" by most EAPN national networks (AT, BG, CZ, DK, EE, IE, IT, MT, NL, PL, PT, RO, SK, SE and UK). Slovenia and Luxembourg rated it as low (4). Only Belgium and Spain gave their NRP participation process a positive rating (7 and 8). As most national networks have experience of both engaging at the national level with the National Action Plans for Inclusion and National Strategic Reports on Social Protection and Social Inclusion (Social OMC) and attempting to engage in the old NRPs under Lisbon, they were in a good position to evaluate the effectiveness of the process and how far it represented progress on participation and governance.

The starting point for EAPN members is the added value of an effective participation process. As highlighted in the EAPN 2009 book on participation,⁶⁵ the scope and phases of participation range from information, consultation to participation, partnership, co-development and decision. If the goals of participation are to get ownership of Europe 2020 and build consensus over effective solutions – the lower level activities (information- consultation) will not be sufficient. The NRP offers a key opportunity to embed a partnership approach – in both the design of the strategy, but also in the implementation and evaluation. In this, the role of anti poverty organisations working directly with people experiencing poverty is key.

⁶⁴ EC Communication (March 2010): *Europe 2020: A strategy for smart, sustainable and inclusive growth*.

⁶⁵ EAPN (2009): [*Small Steps, Big Changes – Building Participation of People Experiencing Poverty*](#).

7.1.1 Low priority given to governance and participation

In the majority of cases, the NRPs give little detail on governance and participation, despite having a section allocated and advice in the code of guidance (AT, BG, CZ, DK, EE, FR, IT, LU, NL, PL, SK, UK). In some cases, the NRP makes reference to the concept of good governance, but provides no real evidence (UK), or detail on who was involved and why, or the degree and outcome of the participation (DE, RO, PT). In the case of Belgium, Ireland, Spain and Sweden, most detail is found, clarifying who was involved and the scope of the engagement.

EAPN Germany: “The German NRP mentions that a number of welfare organisations, trade unions, churches and other NGOs submitted statements on the basis of the Draft NRP. However, most of them were not invited to participate in the process but engaged on their own initiative.”

EAPN Ireland: “The Irish NRP states that *“Consultation with stakeholders, including social partners, the relevant Parliamentary Committee and regional bodies has been undertaken during the development of the NRP that it started in May 2010, and included written and direct engagement. While the NRP does not reflect all the views received, it incorporates amendments where possible and appropriate. The Government also acknowledges that there will be a need for continued engagement with stakeholders in the implementation and further development of the NRP in the years ahead.”*

EAPN Spain: “The NRP contains a full section V on horizontal coordination, highlighting the crucial role of the Parliament, the Autonomous Regions, local governments (through the Spanish Federation of Municipalities and Provinces), social partners and the third sector of social action, in designing and implementing the NRP, so as to increase the degree of responsibility with respect to the Europe 2020 strategy.”

EAPN Sweden: “In the NRP there is a specific section: 5.2 Consultation with interest organisations and Swedish Civil Society, where it sets out that periodic consultations were held with interest organisations and public authorities, who were invited for consultations on two occasions at the Ministry of Education and Research and the Ministry of Health and Social Affairs to discuss the targets and implementation. However, much of the discussion focused on *“how to improve the dialogue with organisations in civil society on the strategy’s implementation. The Government intends to review the forms for consultation, to ensure a better alignment with the Europe 2020 annual cycle and the national decision-making process.”*

7.1.2 NRP limited to an intergovernmental process

Where detail was provided, most networks highlight the dominance of the process as intergovernmental and interdepartmental (SK, CZ, LU, DE, SE, AT). In some cases, this highlights progress in improving the link and involvement of social ministries in the overall economic and employment strategies, and the increase in priority. However, the process appears to have remained firmly in the hands of economic and Prime Ministers, with social ministries often kept at arms length. This was contrasted unfavourably by some networks to the previous engagement with the social ministries in the development of the NAP Inclusion in the Social OMC.

EAPN Slovakia: “This was mainly interdepartmental cooperation, coordinated by the Ministry of Finance..... All the ministries, central authorities, regional governments, representatives of employers and employees were invited to participate.”

EAPN Belgium: “Under the Social OMC, the Secretary of State for the fight against poverty was responsible for the NAP Inclusion. Under the NRP it’s the Prime Minister. It’s difficult to be in contact with this level, so we have to use the indirect route via the social inclusion ministry, with whom we have good relations, but which seems to have little influence over the Prime Minister.”

EAPN Austria: “We were told that we should not take this exercise too seriously and especially not expect to have any impact as policies are *“defined by government only.”*

EAPN Romania: “The whole NRP was made by the Department of European Affairs, and while it clearly talks the talk, walking the walk will be something entirely different...”

7.1.3 Some improvement from draft process, but more priority given to social partners

There is evidence of an improvement in the number and type of stakeholders invited to participate in the NRP from the draft NRPs in November to the full NRP in April. The majority of EAPN national anti poverty networks received some invitation (AT, BE, BG, DK, EE, FR, DE, IE, LU, NL, PT, ES, SE), whilst a small number were not engaged in any way (CZ, PL, SK, UK). In some cases, EAPN was not invited directly, but participated as part of a broader civil society platform (IE, SE). In some cases, EAPN networks took the initiative to ask for the invitation (EE, SI, and NL). However, it was clear that social partners and different levels of government were often considered preferential partners, with the involvement of civil society having lesser status (DE, LU, SE). The direct involvement of people experiencing poverty was not contemplated explicitly, except in Belgium. However, some direct representatives of excluded groups did participate (AT, IE) and some EAPN networks prepared responses on the basis of meetings with people experiencing poverty (BE, DE, LU).

Some responses highlighted the influence of the European Commission in pressing member states to improve stakeholder involvement (LU, PT). EAPN also carried out a campaign to this effect, together with the Social Platform and the Spring Alliance at the end of 2010. However, it is clear that the Commission pressure for some stakeholder involvement was the main trigger, anxious to confirm the legitimacy of the strategy process.

EAPN Estonia: “When the information came to us, we asked for inclusion and they (the Parliament’s Strategy Bureau, who wrote the paper) promised to do so, but in the end inclusion just meant a seminar.”

EAPN Czech Republic: “Anti poverty NGOs and EAPN were not relevant to the government. It was managed through the Government ministries and only specific stakeholders were invited: not the poverty or social inclusion ones (economy, energy).”

EAPN Sweden: “The Government admits the NGO demands for a better dialogue, but only intends to review the forms of consultation. There is no ambition to improve the dialogue itself. There is a more ambitious strategy for dialogue with social partners.

EAPN Portugal: “After the first version of the NRP was sent to the European Commission – and we believe because of the pressure of the EC – some information meetings took place during February – quite late!”

EAPN Luxembourg: “Civil society was convened by the Ministry of Family, where a will for sincere collaboration was demonstrated, but it was too late to influence the NRP. Another meeting about the energy targets was convened by the Ministry of Economy; there the invitation said that they were asked to carry out consultation by the Commission, and that other meetings should follow, but they didn’t...”

7.1.4 Stakeholder input limited to the poverty section, not overall NRP

Several members highlighted that where a participation process was considered, it was very restricted. Civil society stakeholders were primarily invited to comment on the small, specific section related to the poverty target and Guideline 10, rather than to the overall macroeconomic and employment policies of the NRP, even though these policies have a major impact on poverty and social exclusion, particularly in regards to social protection systems and quality job creation. (See Chapter 1). This was mirrored, to a certain extent, by the restricted role of the social ministries themselves, as highlighted above (BG, FR, DK, NL).

EAPN Bulgaria: “EAPN was consulted in the first steps of the process, establishing national anti-poverty targets. We presented a position paper to the Ministry of Labour and Social Policy, questioning the target and the methodology. The consultancy was purely formal and we did not receive any clear answers to the questions raised.”

EAPN France: “NGOs were consulted in the National Council for the Fight Against Poverty, who sent an opinion on our views. But we don’t know yet what was taken on board.”

EAPN Netherlands: “Participation was by e-mail only, responding to a half paper text explanation about the 3 European Poverty indicators. We have never seen the draft NRP. We did receive a letter informing us that because of the consultation the target group age of living in a jobless households would be extended from 0 to 64, to include children and old people.... However, this in no way reflected our real input...”

7.1.5 Low quality participation: information, not consultation or partnership

Most networks who were invited to participate in the NRP process highlighted the low level of participation, representing more an **information** process, rather than active **consultation, participation or partnership**. In many cases this involved a meeting or seminar, where stakeholders were *informed* of the NRP (AT, DK, EE, PT). In some cases, the meetings were held without agendas or minutes, highlighting their hurried, rather adhoc nature (DK, PT). In other cases, EAPN and other stakeholders were asked to provide best practice examples (AT), rather than their views on the targets and appropriate policy solutions. In other countries, a **consultation** process asking for input was carried out – either by internet (EE) or by e-mail. Some EAPN networks were consulted on specific issues, i.e. regarding the poverty target (BG, DK, IE). However, in at least one case (IT) the process was completely held behind closed doors.

However, when it comes to **outcomes**, only Ireland and Spain saw some small impact. Most responses highlight that their views were not taken on board (AT, BE, BG, CZ, DE, DK, EE, FR, NL, PT, SE), nor was any detailed feedback provided.

EAPN Austria: “EAPN was invited to a stakeholder meeting on the NRP. We were however only asked to give some best practice examples to illustrate the proposed measures – and clearly told there was no possibility to have any other impact. On the contrary, we were told that we must not expect to have any impact whatsoever. The meeting was thus an information meeting only, and cannot qualify even as a consultation process.”

EAPN Denmark: “EAPN Denmark participated last year in a meeting on poverty indicators. But the indicators have not been finished. We then participated in 2 meetings with the consultative contact group in the Ministry of Foreign Affairs responsible for the NRP. No agenda, one way communication. Then we were given 2 days to respond to the NRP. Not satisfying...”

EAPN Estonia: “The inclusion was simulated. No information was given out. The initial document was uploaded to the public inclusion website for 1 month in December. It was impossible to track which comments were made or whether the recommendations were taken on board. If we asked, we didn’t get an answer. We attended a seminar, where they introduced the NRP and answered some questions, and allowed us the possibility to change and add some formulation details, until the end of the same day (16.00). The poverty and social inclusion issue however was totally unknown..... But they have promised to invite us to next meetings.”

7.1.6 A step backwards from the NAP/Social OMC, but forward for the NRP?

Most networks saw the lack of meaningful engagement in the new NRP process as a step backwards compared to the level of civil society group engagement in the National Action Plans for Inclusion and the National Strategies for Social Protection and Social Inclusion (AT, BE, BG, CZ, FR, DE, NL, PL, PT, SE and UK). This was due to the explicit commitment and objective in the Common Objectives of the Social OMC, to “mobilize all actors”. This commitment was initially successful in embedding civil

society in a new partnership role in EU social inclusion policy, proposing solutions as well as shared implementation through on-going dialogue. A few networks, however, underlined that the new NRPs did represent progress in terms of participation in the overarching economic and employment policy agenda, compared to the old NRPs under Lisbon. They underlined the potential for future progress (DK, ES, IE, LU). Will 2012 reflect a step forward or back?

A step back...

EAPN Austria: – “definitely a step backwards, the developing process around the OMC was not taken on board, and the role of the stakeholders is very unclear.”

EAPN Czech Republic: “It’s a step backwards. We have always been told that it is something completely new that no one is well informed about with new rules.”

EAPN Netherlands: “After this consultation process we actually feel ashamed to be mentioned as a partner. We feel totally used and our involvement and influencing possibilities are a hundred steps backwards...”

Or a step forward?

EAPN Denmark: “For us it’s a step forward to become member of the NRP contact group.”

EAPN Ireland: “The process for developing the NRP is a slight improvement on past NRP processes, but clearly has much less involvement than the National Action Plans for Inclusion under the Social OMC.”

7.2 Strong interest from NGOs to engage and some positive responses

7.2.1 Anti Poverty Networks ready to engage and offer solutions

Despite the difficulties of the process in this first year, with the majority of EAPN networks feeling the engagement was more virtual than real, an impressive number of networks worked to prepare and submit a specific input to the NRP, even when in some cases they were not invited directly (BE, BG, CZ, DK, FR, DE, IE, NL, PL, PT, ES, SE, SI). In some cases, this was a short input directed to the consultation, but in other cases it entailed a comprehensive analysis and alternative proposals (ES, BE, DE, IE⁶⁶).

EAPN Germany: “We criticized the lack of participation of civil society, publically at 2 events in 2011, when the responsible officer from the Federal Ministry of Labour and Social Affairs was present. In March and May, EAPN Germany launched statements to the NRP and sent it to the ministries, members of the Bundestag and the European Commission.”

EAPN Sweden: EAPN and other NGOs decided to write to the Commission and express our disappointment with the lack of involvement.”

⁶⁶ In the case of Ireland, this was developed as part of the wider community and voluntary pillar.

7.2.2 Actively engaging NGOs in the NRP – positive practice

In our survey, 3 networks gave a more positive assessment to the 2011 NRP engagement, and underlined the room for progress (IE⁶⁷, ES, BE). All these networks prepared detailed submissions and were relatively actively engaged in a dynamic exchange.

Common success elements include:

- Establishment of a *regular on-going dialogue* as civil society partners (BE, IE,⁶⁸ ES).
- Involvement in *all stages* of the NRP, including in the *identification of problems, targets, appropriate policies and funding, implementation and evaluation* (BE, ES).
- Involvement in *all policy fields* – including macro-economic and employment (ES).
- Giving backing to the *strengthening of the Social OMC* and the *reinforcement of National Action Plans on Inclusion* to underpin the NRPs (BE, IE,⁶⁹ ES).
- Chance to make *written as well as oral* input (IE,⁷⁰ ES, BE).
- Opportunity to get *systematic feedback and impact* on the final results (ES).
- Support to *engagement of people experiencing poverty* directly, either directly or through preparation meetings and financial help (BE).

EAPN Belgium: “BAPN prepared its input to the meetings together with people experiencing poverty. These views were presented to the Working Group Actions of the NAPSI, and transmitted directly to the Prime Minister, responsible for the NRP. At the same time, BAPN formed part of a cross-sectoral initiative at the invitation of the trade unions etc, similar to the EU-level Spring Alliance⁷¹ This grouping presented a joint text with common demands on the NRP and achieved a meeting with the Prime Minister (we’d tried by ourselves but did not succeed). However, the meeting itself didn’t lead to much, as the cabinet limited itself to listening to our demands and informed us of the NRP procedure – no debate, nor exchange of ideas. We see it as indispensable to have a proper instrument as a base to develop an effective strategy to fight poverty and social exclusion – the Social OMC.”

EAPN Ireland: “EAPN was consulted through the Community and Voluntary Pillar, with a call for an initial input to the Draft NRP in early November, but had very little time to prepare this. In February 2011, the pillar had a meeting with the Department of the Taoiseach (Prime Minister), who was coordinating the NRP and representatives from most of the Departments responsible for sections. Detailed comments were made on the NRP. Shortly before the final NRP was submitted a draft was made available and the Community and Voluntary Pillar made a final submission. There was also a separate more intensive engagement on the poverty targets, with EAPN Ireland attending one meeting. Community and Voluntary Pillar members receive some funding to engage in social partnership. However there were large cuts to funding in 2011.”

EAPN Spain: “We were initially invited to the preparation of the NRP and widely involved in the overall process, as a coalition of NGOs and Platforms, led by EAPN ES. We had a first class dialogue (with vice presidency and general secretaries). Many of the initial comments were taken on board. We could redraft the document, pass it onto the authorities and then have a chance to ground our proposals.”

⁶⁷ IBID

⁶⁸ IBID

⁶⁹ IBID

⁷⁰ IBID

⁷¹ The Spring Alliance is a broad coalition formed at EU level, involving social stakeholders: ETUC, Social Platform, EEB, and Concord.

SUMMARY OF MAIN MESSAGES

1. **Low priority given to governance and participation in the NRP** – most sections provided minimal detail or priority given to stakeholder involvement.
2. **NRP is primarily an intergovernmental process, with continuing dominance of economic ministries over social ministries, undermining a balanced approach to inclusive growth.** The engagement with regional and local levels is invisible.
3. **Some evidence of increased involvement of stakeholders, including civil society organisations, from draft NRP, but generally low quality and effectiveness.** Most at level of information meetings or e-consultations, with little chance of influencing outcomes. Input normally limited to poverty section only.
4. **A step back from the Social OMC, but forward from Lisbon NRP?** The majority regret the decline in effective national stakeholder dialogue promoted in the best examples of the Social OMC – e.g. National Action Plans for Inclusion, particularly with the engagement of people experiencing poverty. However some improvement noted on the old NRP – a reason for hope? Good practice examples stand out in Spain and Belgium.
5. **Anti Poverty and Social NGOs ready to engage!** A positive message is the readiness of NGOs working with people experiencing poverty to engage directly in the NRPs – in the design, implementation and evaluation. We are part of the solution, not the problem!

ANNEX 1

EAPN Checklist/Scoreboard for Assessing National Reform Programmes

Scoreboard/Checklist Question	Score 1-10 (1-low)
Macroeconomic Surveillance and Scenario	
1. How far do the Macro-economic policies support social inclusion ? i.e. <i>do they increase investment in social protection/services and quality job creation? Do they reject austerity cuts on benefits and services?</i>	
2. How far do they promote greater equality , fairer distribution and redistribution of income and wealth? i.e. <i>do they reduce the gap on income, wages and taxes?</i>	
3. How far is there a strong recognition of the need to deliver social inclusion beyond employment and including through economic measures?	
Thematic Coordination	
EMPLOYMENT	
4. How much priority is given to creating quality jobs , which excluded groups could access? i.e. <i>investment in job creation, particularly green/social jobs? Are they quality?</i>	
5. How far are strategies proposed to increase job quality and tackle in-work poverty ? i.e. <i>raising wages, improving access to quality jobs, job security, employment rights and conditions, reducing precariousness,..</i>	
6. Are social economy and social innovation promoted, including through appropriate legislation, tools, as well as funding and can NGO's easily access this funding?	
7. How far is access to work for excluded groups prioritised through personalized pathways ? i.e. <i>individualised support to access work, without hardening sanctions and increasing conditionality?</i>	
EDUCATION AND TRAINING/LIFE LONG LEARNING	
8. How far are comprehensive supportive measures proposed to tackle early school leaving ? i.e. <i>personalized support, wrap-around support for families, comprehensive approach dealing with complex difficulties, recuperation mechanisms, 2nd chance, informal or non-formal training through community approaches?</i>	
9. How far is effective life-long learning backed , with support to informal/non-formal methods? i.e. <i>support for education/training throughout the life cycle, supporting professional, personal and community development e ensuring access to education to excluded groups.</i>	

POVERTY AND SOCIAL EXCLUSION	
10. How far are measures taken to ensure an adequate minimum income and social protection ? i.e. <i>are minimum income/benefits increased/improving take up and coverage/reducing conditionality?</i>	
11. How far is access to affordable, quality services prioritised ? i.e. <i>is focus given to ensuring affordable access to housing, child and other care services, health, education and training, counselling, as well as tackling energy poverty?</i>	
12. How far are integrated active inclusion approaches promoted? i.e. <i>integrated strategies to ensure adequate minimum income, access to quality jobs and services.</i>	
13. How far are effective policies put in place to tackle child poverty ? i.e. <i>ensuring adequate family income, supporting parents into quality jobs, and access to affordable quality care services, defending children's rights.</i>	
14. How far are policies promoted to tackle homelessness and housing exclusion ? i.e. <i>access to appropriate housing and support services, ensuring adequate income?</i>	
15. How far are policies promoted to fight discrimination, particularly against migrants (including undocumented and ethnic minorities - Roma) ? i.e. <i>actions taken to ensure equal access to rights, resources and services.</i>	
GENDER, DISCRIMINATION AND EQUALITY	
16. How far are policies proposed to tackle discrimination and inequalities in access to jobs, training, services and benefits and to promote greater equality? <i>Is discrimination against key groups recognized and mainstreamed to guarantee access to rights?</i>	
17. How far is gender equality promoted? i.e. <i>policies to ensure women have equal access to rights, resources and services.</i>	
18. To what extent are approaches to demographic change and active ageing , as well as solidarity between generations, respectful of human dignity, instead of viewed strictly from the economic competitiveness perspective?	
Horizontal and Methodological Issues: Structural Funds and Participation	
STRUCTURAL FUNDS	Score 1-10
19. How far are Structural Funds used to effectively promote social inclusion (integrated active inclusion approaches, access to quality jobs, education/training and life-long learning, but also access to quality services –, including anti-discrimination, gender mainstreaming initiatives).	
PARTICIPATION	
20. How far were anti-poverty NGOs engaged in effective stakeholder dialogue ? i.e. <i>were anti poverty NGOs involved, was this effective and did it have an impact?</i>	

ANNEX 2: Table of EAPN Scoreboard Results

Table of EAPN Scoreboard Results on NRP Responses 2011

Area	MACRO			EMPLOYMENT				EDUC/TR		POVERTY/SOC EXCLUSION						GENDER/DISCR			SF	PCIP
<i>Questions</i>	<i>1</i>	<i>2</i>	<i>3</i>	<i>4</i>	<i>5</i>	<i>6</i>	<i>7</i>	<i>8</i>	<i>9</i>	<i>10</i>	<i>11</i>	<i>12</i>	<i>13</i>	<i>14</i>	<i>15</i>	<i>16</i>	<i>17</i>	<i>18</i>	<i>19</i>	<i>20</i>
Austria (57/2.85)	5	2	2	4	5	1	1	3	3	4-5	4	3	3	1	1	3	3	3	4	1
Belgium (102/ 5.36)	6	3	7	6	6	?	5	5	5	7	6	3	5	6-7	5	3	4	7	5	7
Bulgaria (43/2.15)	2	1	2	2	3	3	2	3	3	1	2	1	2	2	2	3	4	2	1	2
Czech Republic (52/ 2.6)	2	3	1	1	1	1	4	5	2	1	6	3	5	3	5	2	2	2	1	2
Cyprus N/A																				
Denmark (30/1.5)	1	1	1	2	2	1	2	2	2	1	1	1	2	2	1	1	2	2	1	2
Estonia (67/3.5)	3	2	1	4	7	5	9	6	3	1	5	2	5	1	5	2	3	2	-	1
Finland N/A																				
France (No scoring)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Germany (No scoring)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Greece N/A																				
Hungary N/A																				
Ireland (48/2.4)	2	1	2	2	3	2	4	5	4	1	3	4	4	1	1	1	2	1	2	3
Italy (20/1)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1

Latvia N/A																				
Lithuania (42/8.4)	8	9	8	-	-	-	-	9	8	-	-	-	-	-	-	-	-	-	-	-
Luxembourg (51/2.55)	1	1	1	2	2	2	2	4	4	6	6	2	6	3	1	1	1	1	1	4
Malta (42/4.2)	5	3	3	-	-	-	-	-	-	5	5	4	4	5	3	-	-	-	5	-
Netherlands (22/1.15)	1	1	1	1	1	1	1	3	2	1	1	1	1	1	1	1	1	1	-	1
Poland (27/1.35)	1	1	1	4	1	2	1	3	1	1	2	1	1	1	1	1	1	1	1	1
Portugal (81/4.05)	3	3	3	1	1	1	1	3	5	3	2	1	3	3	1	3	3	2	4	1
Romania (85/4.25)	5	3	6	6	5	2	2	5	6	5	5	5	2	2	6	6	6	4	3	1
Spain (101/5.3)	3	1	4	5	4	5	6	6	5	6	5	7	6	5	5	8	7	5	?	8
Slovakia (58/2.9)	3	3	8	5	1	3	4	2	3	1	2	3	3	2	3	2	3	2	3	2
Slovenia (70/3.5)	6	5	5	2	2	2	3	3	4	7	6	6	2	1	6	1	1	1	3	4
Sweden (37/1.85)	1	1	1	1	1	3	3	1	1	1	3	1	3	1	2	3	7	1	1	1
UK (10/1)	1	1	1	1	1	1	1	1	1	-	-	-	-	-	-	-	-	-	-	1
Total	60 3.00	46 2.3	59 2.95	50 2.77	47 2.6	36 2.1	50 2.77	70 3.68	63 3.31	54 3.00	65 3.61	49 2.72	58 3.22	42 2.33	50 2.77	42 2.47	51 3.0	38 2.23	36 2.41	43 2.38

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The European Anti-Poverty Network (EAPN) is an independent network of non-governmental organisations (NGOs) and groups involved in the fight against poverty and social exclusion in the Member States of the European Union, established in 1990.



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