



EUROPEAN ANTI POVERTY NETWORK

**PROGRESS REPORT**

**EAPN MEMBERS AND THE EU  
COUNCIL RECOMMENDATION  
ON ADEQUATE MINIMUM INCOME  
ENSURING ACTIVE INCLUSION**

2025

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**Robert Bosch  
Stiftung**



**EUROPEAN ANTI POVERTY NETWORK**

# Progress Report

## EAPN Members and the EU Council Recommendation on Adequate Minimum Income Ensuring Active Inclusion

May 2025

The adoption of the **Council Recommendation of 30 January 2023 on Adequate Minimum Income Ensuring Active Inclusion**<sup>1</sup> (hereafter “*Council Recommendation*”) marked a key milestone in the European Union’s fight against poverty. As part of the implementation of the European Pillar of Social Rights Action Plan, the Council Recommendation represents an important political acknowledgment of the role that Minimum Income Schemes (MIS) play in guaranteeing a dignified life and enabling social inclusion.

**MIS** are a vital component of **universal social protection systems** and an essential pillar of a **comprehensive, rights-based, person-centred active inclusion strategy**. When designed and implemented adequately, MIS contribute to:

- Guaranteeing a decent standard of living and a life in dignity for all,
- Enabling people to fully participate in society,
- Supporting integrated, multidimensional strategies to fight poverty and social exclusion both at the national and EU levels.

EAPN **welcomes the adoption of the Council Recommendation** as a step forward towards strengthening Minimum Income across the EU. However, we also raised **several concerns** at the time of its adoption. These concerns remain valid today, as it will be outlined across this progress report.

Indeed, we believe the **lack of binding nature** of the Council Recommendation limits its potential to drive structural change towards poverty eradication<sup>2</sup>. More specifically, EAPN regrets:

- The lack of **clear universal and rights-based approach** of the Council Recommendation, guaranteeing access to MISS to all people in need,
- The absence of a **common EU framework and methodology for setting reference budgets**,
- The absence of **concrete measures to tackle structural discrimination** and address persistent **non-take-up** by vulnerable groups, including Roma communities, refugees, women, racialised minorities, and undocumented migrants.

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<sup>1</sup> [Council Recommendation of 30 January 2023 on adequate minimum income ensuring active inclusion 2023/C 41/01](#)

<sup>2</sup> [Minimum Income Council Recommendation: Not Enough To Fight Poverty - EAPN](#)

This **Progress Report** reflects EAPN's perspective on the state of play regarding the implementation of the Council Recommendation to date, ahead of the first assessment report to be published by the European Commission. It is based on assessments from **8 EAPN national networks and European organisations**, gathered through a written consultation undertaken in Spring 2024 and an online stakeholder meeting with the European Commission held on Wednesday 7 May 2025.

This report comes at a time of increasing pressure on welfare states and social protection systems. Across the EU, governments are reverting to austerity measures, prioritising defence spending. People experiencing poverty are increasingly impacted by stagnating inflation and rising living costs. Meanwhile, recent data shows **no significant progress in poverty reduction at the EU level**<sup>3</sup>.

This assessment report confirms EAPN's initial position: the Council Recommendation must be treated as a **starting point towards a binding EU Framework Directive, as crucial element of comprehensive, rights-based and adequately funded EU Anti-Poverty Strategy**.

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<sup>3</sup> [Eurostat updated poverty and social exclusion statistics for the EU in May 2025](#)

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# 1. ADEQUACY OF MINIMUM INCOME SCHEMES

## EAPN'S POSITION

**Adequacy** as a **non-negotiable principle** for minimum income schemes to effectively reduce poverty and promote dignity and social inclusion. For EAPN, minimum income must **guarantee a life in dignity**, not just basic survival.

We advocate for MIS being **above the at-risk-of-poverty-threshold**, based on **reference budgets reflecting the cost of living**, with **automatic updates** in line with the inflation, and providing **stability and predictability** over time.

## OVERALL ASSESSMENT

- **Inconsistent and non-transparent methodologies** are used in several Member States to calculate minimum income levels, undermining the comparability and fairness of schemes across the EU.
- In most countries, **minimum income remains below national poverty thresholds**, particularly the EU benchmark of 60% of median equivalised income. This gap severely limits the effectiveness of these schemes in ensuring a life in dignity.
- At the current pace and with the present level of ambition, **minimum income schemes are unlikely to deliver a significant reduction in poverty by 2030**, falling short of the goals set out in the Council Recommendation and the European Pillar of Social Rights.

## EAPN MEMBERS' ASSESSMENT

In **IRELAND**, decisions to increase working-age minimum income or broader social welfare payments are made annually during the government's Budget process, but **no formal benchmark or methodology is used** to assess the adequacy of these payments. While the **Roadmap for Social Inclusion 2020–2025** includes a commitment to consider and report on the potential application of a benchmarking approach to working-age and other welfare payments, it remains unclear whether a final report has been published in 2024.

For years, **EAPN Ireland**, in addition to many other community and voluntary organisations have **consistently advocated for a benchmarking system** to ensure that welfare rates are sufficient to lift people above the poverty line and to guarantee a **Minimum Essential Standard of Living (MESL)**. The MESL, developed by civil society through reference budget standards, reflects the real cost of living in dignity in Ireland.

Research by the MESL Research Centre highlights that recent increases in social welfare have not kept pace with inflation, effectively resulting in real-term cuts for those reliant on the social protection system.

In 2024, all working-age welfare rates were increased to €232 per week, with the exception of those under 25 years of age without children and not living independently, who receive €141.70 per week.

These rates fall well short of poverty and adequacy benchmarks:

- The 60% at-risk-of-poverty line was €317.30 per week in 2023.
- The MESL threshold in 2024 was estimated at €280 per week for an individual in an urban area, and €344 per week for someone in a rural area.

This shortfall reinforces the need for urgent reform and the implementation of a formal benchmarking process.

Different groups in society face additional costs in achieving a decent standard of living. For example, disabled people incur significant extra expenses due to their impairments. According to the government's 2021 Cost of Disability Report, the annual additional costs were estimated as follows:

- €9,600 to €12,300 for individuals with a severe disability
- €8,700 to €10,000 for those with a mild to moderate disability

These estimates precede the recent inflationary surge. Adjusted for inflation, the estimated additional annual costs now range from €10,397 to €15,177.

Meanwhile, the Disability Allowance in 2024 remains at just €12,064 per year—the same as the Jobseeker's Allowance—demonstrating its inadequacy in covering the real cost of living with a disability. **Disability organisations** have long called for the introduction of a specific Cost of Disability payment to address this shortfall, ensuring that people with disabilities are not further disadvantaged by the design of Ireland's social protection system.

In **ITALY**, the **Assegno di Inclusione (ADI)** is based on a means test known as the ISEE (*Indicatore della Situazione Economica Equivalente*), which is used to assess the economic situation of families applying for social, health, educational, and financial support.

To meet the **2030 targets** outlined in the Council Recommendation, the income of people living in poverty must **grow by 40%**. However, **EAPN Italy** raises several concerns that cast doubt on the country's ability to meet this goal:

- Key national strategies, including the National Anti-Poverty Plan, expired in 2024, with no clear commitment to their renewal or update.
- The increasing regional autonomy in areas such as health, social services, education, and transport threatens the universality and uniformity of access to essential public services across the country.
- Targeted measures for vulnerable groups—such as older people, single-parent families, children, and persons with disabilities—are lacking or insufficiently implemented.
- Migrant populations, particularly unaccompanied minors, are insufficiently protected and often face additional legal and systemic discrimination.

Given the compounded impacts of recent global crises—including armed conflicts, climate change, and the social consequences of the energy transition—it **appears unlikely that Italy will achieve the required 40% income growth for people experiencing poverty by 2030.**

In **POLAND**, the **Social Intervention Threshold** (*Próg Interwencji Socjalnej*, PIS) is used to determine income eligibility for social assistance benefits. This methodology **partially aligns** with the Council Recommendation's call for a "transparent and robust methodology," as it is based on a **basket of goods and services approach**.

However, there are significant concerns regarding both the **transparency** and **comprehensiveness** of this method:

- While social partners are involved in setting the PIS, non-governmental organisations and the general public are excluded from the process. There is no public consultation on the contents of the consumption baskets.
- Detailed information on the specific items, quantities, quality, and pricing included in the baskets is not publicly accessible, limiting transparency.
- The scope of the basket is also questionable. It does not fully reflect the costs associated with social participation and explicitly excludes education expenses, undermining its adequacy.

Moreover, the current benefit levels in Poland fall **below adequacy standards**:

- As of 2024, the income threshold (*kryterium dochodowe*) for social assistance is lower than the extreme poverty line, defined by the subsistence minimum (*minimum egzystencji*).
- Some benefits, particularly the periodic allowance (*zasiłek okresowy*), are especially inadequate. This benefit only covers 50% of the calculated income gap, providing insufficient support to lift people out of poverty.
- The review and adjustment of income thresholds and benefit levels occur only once every three years, which is not frequent enough to maintain adequacy—particularly in periods of high inflation and rising living costs.

Nevertheless, there are **some positive developments**:

- Poland applies differentiated thresholds based on people's capacity to work. For example, from 2024, the threshold for the permanent allowance (*zasiłek stały*) is set at 130% of the income criterion for individuals who are unable to work.
- The government has proposed to raise income thresholds for social assistance benefits by 30–37% from 2025 onwards. However, EAPN Poland considers this increase insufficient to ensure adequacy.
- A notable recent step is the creation of an expert team, including a representative from EAPN Poland, to develop proposals for a comprehensive reform of the social assistance system. This includes efforts to introduce annual indexation of income thresholds and to strengthen guaranteed minimum income benefits for people able to work.

Despite these improvements, Poland's **minimum income scheme still falls short** of the Council Recommendation's standards for adequacy and transparency. **Significant reforms are** needed to ensure that income support is progressively improved and made adequate by 2030, in line with EU objectives.

In **PORTUGAL**, the calculation of the amount of the **Social Insertion Income** (SII) depends on the Social Support Index (SSI). The variations it has undergone have not helped to improve the adequacy of this benefit. The index was increased only from 2023.



This measure allowed for an increase in the value of the Social Integration Income (SII), but it was the Solidarity Supplement for the Elderly (SSE) that saw the most significant rise. The SSE now stands at €600 per month, placing it above the poverty threshold of €591/month in 2022. For the SII, the reference value was increased to €237.25.

The amount of the SII is calculated based on the size and income of the household - or the individual, if they live alone. The updated breakdown is as follows:

- €237.25 (100%) for the main recipient
- €166.08 (70%) for the second adult in the household
- €118.63 (50%) for each child

According to the 2024 Social Security Budget, this increase in the reference amount to €237.25 is expected to result in an additional €30 million in expenditure. Overall, the budget for social inclusion and poverty reduction measures, which includes the SII and related benefits, is projected to grow by 6.2% (Portuguese Government, 2023). While this increase is a positive step, it is clearly insufficient to cover the real costs of living, especially in the current context of high inflation and rising living expenses.

Despite its limitations, there is a strong consensus among both beneficiaries and professionals involved in its implementation regarding the importance of the SII:

- *“The value of the SII is low, but it helps.”*
- *“It is very important to have the SII so that people can live with dignity when they have no income or family support. It won’t cover all expenses, but it is essential.”*
- *“If we consider the measure from the perspective of bringing some income to families in situations of extreme vulnerability, it meets basic needs. Without it, their situation would be even more precarious.”*

These testimonies underscore the **vital role of minimum income schemes** in alleviating poverty, while also highlighting the **inadequacy of current benefit levels**.

The Council Recommendation stresses that income support should progressively increase the income of people without sufficient resources. However, this is not yet a reality, as current levels do not allow individuals or households to meet their expenses in a dignified way. In many cases, SII payments are absorbed almost entirely by housing and rent costs, leaving people dependent on other forms of institutional support (such as food aid) to meet their basic needs:

- *“Even if someone pays just €50 for rent, the SII is not enough. People have to piece together different types of support when it shouldn’t be necessary.”*

Respondents also stressed the **need for greater transparency regarding entitlement**: people should be clearly informed about the exact amount they are eligible to receive, with calculations reflecting housing costs, food needs, and the presence of dependents.

In **SPAIN**, there is **no publicly available data on the methodology** used to determine the national minimum income level. However, the 2024 monthly benefit amounts—€604.21 for a single adult and €1,148.01 for a household of two adults and two children—remain **below the severe poverty thresholds**

for 2023, which were **€611** and **€1,283**, respectively (based on 40% of the national median equivalised disposable income).

It is worth noting that **these amounts have increased above the annual inflation rate**. Between 2022 and 2023, all minimum income amounts rose by 15%, and between 2023 and 2024, most increased by 6.87%. However, some categories saw more modest increases of 2.17% and 2.84%, while one benefit amount rose by 16.59%.

Despite these increases, a **report by the Future Policy Lab for Oxfam Intermón<sup>4</sup>** concludes that current levels are still inadequate. Based on its findings, the report recommends that **minimum income amounts and thresholds should exceed at least 50% of the median income**, and that the equivalence scale used for additional household members should align closely with the modified OECD scale (i.e. 0.5 for additional adults and 0.3 for minors). According to the report, this approach would ensure that beneficiary households are lifted above the severe poverty line, while also encouraging greater take-up of the benefit.

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<sup>4</sup> [El IMV, accesible sólo para un 16% de las personas que podrían recibirlo, según estimaciones de Oxfam Intermón y Future Policy Lab](#)

## 2. ACCESSIBILITY OF MINIMUM INCOME SCHEMES

### COVERAGE, NON-TAKE-UP AND DIGITALISATION OF PROCEDURES

#### EAPN'S POSITION

**Coverage:** Minimum Income Schemes (MIS) must be accessible to all who need them, without discrimination or unnecessary barriers. While the Council Recommendation encourages Member States to improve access, it also leaves room for the use of restrictive eligibility criteria, such as residency requirements, which can exclude the most vulnerable.

**Non-take-up:** Although the Council Recommendation calls on Member States to address non-take-up, EAPN regrets the absence of concrete measures specifically targeting the most marginalised groups—such as Roma communities, refugees, and undocumented migrants—who face the highest barriers to access and are often excluded in practice.

**Digitalisation:** Although digitalisation can have potential benefits on the accessibility of social protection schemes, its increased use can further exclusion of people experiencing poverty - especially when digital procedure becomes the only choice of accessing MIS. Digital services should be offered as an option, not as a mandatory way of accessing MIS.

Overall, EAPN believes accessibility is much broader than eligibility. It also includes awareness, administrative simplicity, digital and non-digital access points, availability of in-person support, and lack of stigma and discrimination.

#### OVERALL ASSESSMENT

- **Coverage:** EAPN members reported a concerning number of restrictive conditions to access MIS. Either these conditions include numerous exceptions to the rule, bringing complexity and unclarity, or they drastically restrict who is entitled to access MIS, excluding many in need.
- **Non-take-up** remains a concern of EAPN members. Most member states lack of a strategic approach to tackle this complex issue. EAPN members' assessment confirms that the Council Recommendation fails to provide enough guidance for member states to address the problem effectively.
- The increased **digitalisation** of minimum income schemes raises significant concerns. Digital tools often create new barriers for the most vulnerable, particularly for people experiencing poverty, older adults, people with disabilities, migrants, and those with low levels of digital literacy. In rural or underserved areas, poor internet connectivity further compounds these issues. Whilst in-person support is less and less available, increased digitalisation leads to further exclusion of people experiencing poverty.

EAPN **IRELAND** identified 3 issues regarding the **coverage and non-take-up** of minimum income:

1. The **Habitual Residence Condition** (HRC), introduced in 2004 alongside the accession of 10 new EU Member States, is a legal requirement for accessing social welfare supports in Ireland.

While the term "habitual residence" is not explicitly defined in legislation, it generally means that a person must demonstrate both a legal right to reside in Ireland and a degree of permanence, assessed through five criteria. The HRC applies to both Irish citizens and non-citizens.

Decisions on eligibility are made by Deciding Officers in the Department of Social Protection (or Determining Officers for Supplementary Welfare Allowance). However, asylum seekers in the international protection system are not considered habitually resident and are therefore excluded from accessing Minimum Income and other mainstream welfare supports.

**The HRC has been found to disproportionately exclude structurally disadvantaged groups**, including disabled people, Travellers, Roma, migrants, international protection applicants, survivors of domestic violence, and people experiencing homelessness, raising concerns of systemic discrimination.

2. Individuals in the **International Protection system** are excluded from social welfare schemes due to not meeting the HRC criteria.

Instead, they receive modest weekly allowances, along with accommodation and food (when available): €38.80 per week for adults and €29.80 per week for children. As of 2024, **many international protection applicants are no longer provided with accommodation or food** and instead receive a weekly allowance of €113.80. Whether accommodated or not, these allowances are **clearly inadequate** to ensure a life with dignity. Many applicants live in deep poverty, facing severe challenges in meeting basic needs.

3. The current **means-testing rules** for people with disabilities are particularly problematic.

Eligibility for support is assessed based on the income of household members—including family members, romantic partners, or housemates. This creates **financial dependency**, undermines the right to independent living, and reinforces the assumption that disabled people must rely on their families indefinitely.

This approach ignores the **extra costs of living with a disability**, as outlined in the government's own **Cost of Disability Report**<sup>5</sup>. To address this:

- Means-testing should apply only to the individual's own income and assets, not those of cohabitants,
- A universal disability payment should be considered,
- At minimum, higher household income thresholds should be introduced to reflect the additional cost of disability,
- Tapered supports should be put in place to avoid sudden loss of entitlements for those just above the income cut-off, preventing financial cliff edges.

**EAPN Ireland calls for urgent reforms to ensure that minimum income and broader social protection systems are inclusive, accessible, and supportive of all individuals—especially those currently excluded or marginalised.**

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<sup>5</sup> [The Cost of Disability in Ireland – Research report](#)

EAPN **ITALY** identified **several issues concerning the COVERAGE of MIS:**

1. **Transparency and non-discrimination of eligibility criteria:** To qualify for the Assegno di Inclusione (ADI), a household must include at least one of the following: a person with a disability, a minor, an elderly person aged 60 or over, or a member in a condition of social disadvantage enrolled in care and assistance programmes of the local social and health services (SSN).

This approach **categorises people in poverty into multiple sub-groups** based on perceived 'worthiness' or vulnerability, rather than applying a universal rights-based standard. As a result, benefits are no longer treated as essential entitlements, but rather as **paternalistic and provisional supports**, subject to annual budgetary changes.

Furthermore, responsibility for disbursement has been centralised in the National Social Security Institute (INPS), with municipalities limited to compiling lists of potential beneficiaries, weakening local engagement and tailored support.

2. The ADI is designed as a **means-tested income support** aimed at promoting **social and labour market inclusion**, conditional upon participation in a **personalised activation plan**.

To be eligible, a household must meet the following **economic criteria**:

- ISEE (Equivalent Economic Situation Indicator) must not exceed €9,360.
- Annual household income must not exceed €6,000, with adjustments based on household composition, including:
  - +0.50 for each additional disabled or non-self-sufficient member;
  - +0.40 for each member aged 60 or over;
  - +0.40 for each adult with care responsibilities;
  - +0.30 for each adult in a condition of severe bio-psycho-social hardship;
  - +0.15 for each minor child (up to two);
  - +0.10 for each additional minor beyond the second.
- Real estate assets (excluding the primary residence) must not exceed €30,000, calculated based on the IMU tax value. The primary residence is excluded up to a maximum value of €150,000.
- Movable assets (e.g. savings, bank deposits) must not exceed:
  - €6,000 for single-person households
  - €8,000 for two-person households
  - €10,000 for households with three or more members, increased by €1,000 for each minor starting from the third

These thresholds can be increased by:

- €5,000 for each disabled household member
- €7,500 for each non-self-sufficient household member

Additionally, applicants must not own boats or motor vehicles with an engine capacity exceeding 1,600 cc. Importantly, the ADI is not available to single individuals unless they belong to one of the eligible categories mentioned above, excluding many people in poverty who live alone.

Concerning **NON-TAKE-UP and DIGITALISATION**, EAPN Italy made the following assessment:

- **Administrative burden** remains high, as access to basic services and to the ADI is bureaucratised and computerised.
- **Availability of digital and non-digital tools:** Digitalisation negatively affects access to social protection for the most marginalised groups by further excluding them. While electronic tools can facilitate communication and applications for the Inclusion Allowance (ADI), they have also made the process more complex for those lacking the necessary equipment or digital skills. The limited availability of staff further complicates access to the system.
- **Stigma and bias against people experiencing poverty as one of the reasons for non-take-up:** There has been a growing loss of understanding about the reality faced by people living in poverty. They have gone from being seen as victims of a system that produces inequality to being blamed for their own circumstances—as if homelessness or extreme poverty were a lifestyle choice. Stigma, bias and overall discriminatory attitudes can lead to reluctance and fear from people experiencing poverty to use their right to access MIS. A cultural shift is urgently needed, in the language used by the media, policymakers and administrative services.

In **POLAND**, there are two main issues regarding the **COVERAGE of MIS**:

**1.** Poland's minimum income scheme raises serious concerns **regarding inclusiveness and equity in access**. Several aspects of its eligibility criteria may be considered overly restrictive or even discriminatory:

#### **Residency Requirements:**

- The *Act on Social Assistance* imposes strict residency conditions for foreigners to qualify for social assistance, including minimum income benefits.
- These requirements are more restrictive than the proportional and inclusive approach recommended by the Council Recommendation.
- As a result, certain categories of legal residents—such as individuals with short-term work permits or students—are excluded from accessing support.

#### **Additional Eligibility Conditions:**

- To qualify for monetary social assistance, a household must meet both the income threshold and experience at least one additional hardship listed in the Act (e.g., disability, unemployment, homelessness).
- This dual requirement creates additional barriers and may exclude individuals who live in poverty but do not meet the secondary criteria—such as those without a disability certificate or who are not officially registered as unemployed.

**2.** The **adequacy and fairness of Poland's means-testing thresholds** are a major concern:

#### **Inadequately Low Thresholds:**

- As of 2024, the income threshold (*kryterium dochodo-we*) is set below the national extreme poverty line, which is based on the *subsistence minimum (minimum egzystencji)* defined by the Institute of Labour and Social Issues.

- This subsistence minimum does **not account for social participation needs**, meaning it falls short of the EU's vision of ensuring a life in dignity.
- Consequently, Poland's minimum income system provides only partial coverage and fails to address broader social inclusion.

#### Impact on Coverage:

- The low thresholds have contributed to a paradoxical trend: while extreme poverty increased significantly in 2023, **the number of people receiving minimum income benefits decreased**.
- The coverage gap has widened dramatically—from 316,782 people in 2015 to 1,557,106 in 2023.
- **The coverage rate has dropped** from 99.5% in 2016 to 37.3% in 2023, meaning nearly two-thirds of those in extreme poverty are not receiving any minimum income support.

#### Limited Household Differentiation

- The income thresholds are adjusted only for single-person vs. multi-person households, despite the more nuanced household types accounted for in the Social Intervention Threshold (PIS) methodology.
- While there are higher thresholds for individuals unable to work (e.g., the threshold for *zasitek stały* is set at 130% of the basic income criterion from 2024), other minimum income supports remain at 100%, potentially excluding people in need from further support.

Poland's minimum income system falls significantly short of the standards set out in the EU Council Recommendation on adequate minimum income. Key shortcomings include:

- Restrictive and potentially discriminatory eligibility criteria, particularly for non-citizens.
- Income thresholds that are too low to reflect a dignified standard of living and social inclusion.
- A growing coverage gap, with most people in extreme poverty unable to access basic support.

Concerning **NON-TAKE-UP**, EAPN Poland made the following assessment:

- The Polish social assistance system presents a mixed picture in terms of **administrative burden**:
  - **Positive aspects:** Third-party applications are permitted; Self-declarations are accepted for many required documents; Family interviews can be completed electronically; Emergency assistance is available through simplified procedures, without extensive administrative requirements; Authorities are allowed to collect necessary information directly from other institutions.
  - **Negative aspects:** The mandatory family interview (*rodzinny wywiad środowiskowy*) represents a significant administrative hurdle that may discourage potential applicants; The official form for the family interview is lengthy and includes numerous sensitive questions; Regular updates to the family interview are required, adding to the administrative workload; The list of required information is extensive and demanding; The Act on Social Assistance does not contain clear provisions aimed at simplifying procedures or reducing documentation, as recommended by the EU.
- **Stigma and discrimination** against people experiencing poverty is another cause of non-take-up. The *Act on Social Assistance* lacks explicit provisions aimed at combating stigmatisation, though it contains some elements that may indirectly help address these issues:

- **Positive aspects:** Emphasizes respect for human dignity; Mandates confidentiality in the delivery of social assistance: Requires social workers to counteract discriminatory practices; Promotes social integration.
- **Negative aspects:** Does not include provisions for public awareness or anti-stigma campaigns; Lacks targeted initiatives specifically addressing stigma or unconscious bias; No mandatory training for social workers on recognizing and addressing stigma or bias; Does not provide mechanisms for involving social assistance recipients in policy-making or service design.

According to EAPN Poland, **the Polish system falls short on the Council Recommendation**, which emphasises simplified, user-friendly procedures to promote access and increase take-up. In addition, Polish legislation and practice fall short of the Council Recommendation's call for proactive efforts to combat stigmatisation. The absence of comprehensive strategies to address social and psychological barriers suggests that stigma and unconscious bias remain significant obstacles to the effective take-up of minimum income benefits.

Concerning **DIGITALISATION**, although the Act references certain electronic systems, it lacks a comprehensive digitalisation strategy aimed at improving access. It permits the electronic completion of the family interview. However, the Act does not include provisions to ensure accessibility for people with disabilities or non-Polish speakers. There is also no clear emphasis on using digital channels to disseminate information to the public.

In **PORTUGAL**, EAPN highlighted 3 main challenges related to **COVERAGE**:

**1. Access Criteria and Bureaucratic Challenges in the SII (Social Integration Income) System:**

The eligibility criteria for accessing the Social Integration Income (SII) have long been the subject of ideological debate across successive governments. This has contributed to negative public perceptions of both the measure and its beneficiaries. While the current criteria are formally established, they remain unclear to many potential applicants and even to the public. Overall, the SII remains a highly bureaucratic scheme, placing a significant administrative burden on both applicants and implementing agencies.

One of the main issues raised involves the eligibility of young migrants and displaced youth:

*“A lot has changed in the legislation, but many aspects are still unclear—particularly regarding who qualifies and under what conditions,”* explained one stakeholder.

An example was provided to highlight the confusion surrounding the eligibility of migrant youth, particularly students from the CPLP (*Community of Portuguese Language Countries*):

*“If a young person is part of a household receiving SII and is temporarily living elsewhere for study purposes, they remain covered. They don’t need to be registered with the IEFP [Institute for Employment and Vocational Training], and their share is still calculated as part of the household’s entitlement. However, this clarity does not extend to youth arriving from other countries like Guinea. Some come as students, others as tourists or for medical reasons. While some may be registered with the IEFP, the law is unclear on whether being a student qualifies or disqualifies them. This legal ambiguity needs to be urgently addressed.”*



2. Although the processing timeframe in Portugal aligns with the 30-day period recommended by the EU, **the implementation process has its drawbacks.** Under the current system, benefits are granted based on submitted documentation. If complete, the application is approved promptly. However, eligibility is reviewed afterward, which can lead to retroactive adjustments or even disqualification.

*“Applying is now easier, and approval is granted faster. But if the person was not actually eligible, they may have to repay the benefit. This creates debt and financial stress. Previously, approval only came after a technical analysis, which helped prevent such situations. Now, it’s done administratively—it helps some families, but it can also backfire.”*

3. In Portugal, the renewal of SII benefits is performed automatically by the competent authority, based on household and income data stored in the Social Security Information System (as noted on [www.seg-social.pt](http://www.seg-social.pt)). While this automation streamlines the process, **it also highlights the need for improved coordination between public services.**

For example, some beneficiaries face delays in accessing related benefits due to administrative bottlenecks. One case was mentioned: *“My son is still waiting to receive the Social Benefit for Inclusion—another support measure that can be combined with the SII—because the issuance of his medical incapacity certificate [‘certificado multiusos’] is delayed.”*

When it comes to **NON-TAKE-UP**, the following challenges were highlighted by EAPN Portugal:

- Bureaucracy and administrative burden,
- Discrimination against people experiencing poverty,
- Lack of information on how to access the SII,
- Lack of coordination between different services.

EAPN Portugal pointed out the **specific situation of migrants**, especially those who face difficulties with renewing documents with AIMA (*Agency for Integration, Migration and Asylum*) which impedes their access to the SII.

In addition, there are no quantitative data available on the extent of the non-take-up in Portugal. However, EAPN Portugal shared the following testimonies:

- *"It's not widespread in the city that this support exists and there may be people who don't even know they have rights to some things"; "the great enemy is ignorance, on the part of the population, the professionals who are attending to them, the management of the organisations"*
- *"But people don't know where they should go to deal with issues. There's social security, but social security isn't the same process as going to a social worker. Because they tell you to fill in this or that application. They tell you about the possibility of accessing different things."*EAPN Portugal is also hugely concerned with the extent of discrimination against people experiencing poverty. According to another testimony:
- *“Many people hide the fact that they are receiving SII. Some people don't want to benefit from something they could be entitled to because they don't want to be labelled. We need to work on information”.*

EAPN Portugal puts forward a series of recommendations to address non-take-up, **including increased investment in public information** about the SII enhanced **training for professionals**, a **shift in the**

**narrative** around the use of SII—particularly in the media—and **improved personalised support** based on individual needs.

In **SPAIN**, the **ACCESSIBILITY** criteria for the *Ingreso Mínimo Vital* (IMV) are complex. While designed to address the diverse needs of vulnerable individuals and households, the intricate rules can also lead to misunderstandings and confusion among potential applicants.

- **Basic eligibility requirements:** According to the most recent information available in the FAQ section of the IMV page on Spain’s Social Security website, applicants must meet general conditions based on:
  1. **Legal and Effective Residence:** The applicant must have resided legally and continuously in Spain for at least one year, with some exceptions such as minors and/or victims of human trafficking.
  2. **Economic Vulnerability:** Applicants must demonstrate economic hardship, based on an assessment of household income, net worth, and non-corporate assets.
  3. **Cohabitation Unit Requirements:** The cohabitation unit (*unidad de convivencia*) must have been established for at least six months and is defined as a group of individuals living at the same address who are connected by marriage, a de facto partnership, a family relationship up to the second degree (e.g., parents, children, siblings, grandparents, grandchildren, in-laws) or guardianship for adoption or permanent foster care.
- **Special cases for independent eligibility:** certain individuals living with others can still qualify as independent beneficiaries if they meet specific conditions, such as women Victims of Gender-Based Violence, Separated or Divorced Individuals, Displaced Due to Eviction or Force Majeure or Cohabitants Without Family Ties.
- **Individual beneficiaries:** The IMV also provides for individual beneficiaries under certain conditions, such as single adults aged 23+ or some young adults between 18 and 22 years.
- **Independence criteria:** To qualify as an independent individual, applicants must also meet criteria related to residential independence, such as adults between 23 and 29 who must prove they have lived independently for at least two years prior to the application.

However, certain groups remain excluded from the IMV, such as:

- **Young people aged 18–22** not covered by the exceptions listed under point 9
- **Non-nationals** without legal and effective residence in Spain or with less than one year of residency (point 1)
- **Members of newly formed cohabitation units** (formed less than 6 months ago – point 3)
- **Young adults aged 23–29** who have not lived independently for at least two years prior to the application (point 11)
- **Partners in de facto couples** who have not been officially registered for at least two years or have not lived together for at least five years (point 3.2), though individual applications may still be possible if they meet relevant conditions.

Overall, EAPN Spain’s assessment is that revising certain requirements could significantly improve the clarity and accessibility of the IMV eligibility criteria. For example, under current rules, only specific groups

of young people under the age of 23 can apply—provided they meet strict conditions. If the minimum eligibility age were simply set at 18, such exceptions would be unnecessary, and the system would be easier to understand and navigate.

Another area for improvement is the rule requiring a *cohabitation unit* to be established for at least six months. This creates unnecessary barriers, particularly for families where not all members have been officially part of the household for that long—such as cases involving recent family reunification. Removing this requirement would prevent otherwise eligible families from being excluded due to technicalities.

- **Economic Vulnerability Thresholds:** To meet the requirement of being in a situation of economic vulnerability, the IMV sets thresholds for both income and net assets:

**a) Income Threshold:** Applicants must demonstrate that their average monthly income over the previous year is at least €10 lower than the monthly IMV amount applicable to their household size and type. This includes all types of income, such as:

- Contributory and non-contributory pensions
- Public and private benefits
- Any other computable income

These incomes are factored into the assessment to determine whether the household qualifies for IMV support.

<i>Guaranteed amount for the IMV in 2024. No single-parent cohabitation unit.</i>		
<b>Cohabitation unit</b>	<b>Euros/year</b>	<b>Euros/month</b>
One adult	7.250,52 €	604,21 €
One adult and one child	9.425,76 €	785,48 €
One adult and two children	11.600,88 €	966,74 €
One adult and three children	13.776,12 €	1.148,01 €
One adult and more than three children	15.951,24 €	1.329,27 €
Two adults	9.425,76 €	785,48 €
Two adults and one child	11.600,88 €	966,74 €
Two adults and two children	13.776,12 €	1.148,01 €
Two adults and more than two children	15.951,24 €	1.329,27 €
Three adults	11.600,88 €	966,74 €
Three adults and one child	13.776,12 €	1.148,01 €
Three adults and more than two children	15.951,24 €	1.329,27 €
Four adults	13.776,12 €	1.148,01 €
Four adults and one child	15.951,24 €	1.329,27 €
Others	15.951,24 €	1.329,27 €

<i>Guaranteed amount for the IMV in 2024. Single-parent cohabitation unit.</i>		
<b>Cohabitation unit</b>	<b>Euros/year</b>	<b>Euros/month</b>
One adult and one child	11.020,80 €	918,40 €
One adult and two children	13.196,04 €	1.099,67 €
One adult and three children	15.371,16 €	1.280,93 €
One adult and four or more children	17.546,40 €	1.462,20 €

<i>Guaranteed amount for the IMV in 2024. cohabitation unit. Parents/grandparents/guardians or foster parents, one of them has recognized degree 3 dependency, absolute permanent disability or severe disability.</i>		
<b>Cohabitation unit</b>	<b>Euros/year</b>	<b>Euros/month</b>
Two adults and one child	12.615,96 €	1.051,33 €
Two adults and two children	14.791,20 €	1.232,60 €
Two adults and three or more children	19.141,56 €	1.595,13 €

In addition to the standard IMV amounts, a monthly **child support supplement** is provided for each minor member of the cohabitation unit, based on the child's age as of January 1st of the relevant financial year. The supplement is allocated as follows:

- **Children under 3 years old:** €115
- **Children aged 3 to 5:** €80.50
- **Children aged 6 to 17:** €57.50

#### **b) Net Assets Requirement**

Applicants are also subject to a **net assets threshold**. For **individual beneficiaries**, ownership of assets—excluding the habitual residence—valued at or above three times the guaranteed minimum income amount disqualifies the applicant from being considered economically vulnerable. In 2023, this threshold is **€20,353.62**.

For **cohabitation units**, the threshold varies depending on the household's size and composition. A unit is not deemed to be in a situation of economic vulnerability if its net assets (excluding the habitual residence) exceed the corresponding limit set out in the official asset threshold table.

Tabla que muestra la escala de incrementos y límite en euros en el patrimonio en relación con la unidad de convivencia		
Unidad de convivencia	Escala de Incrementos	Límite euros
Un adulto solo	1	20.353,62
Un adulto y un menor	1,40	28.495,07
Un adulto y dos menores	1,80	36.636,52
Un adulto y tres menores	2,20	44.777,96
Un adulto y más de tres menores	2,60	52.919,41
Dos adultos	1,40	28.495,07
Dos adultos y un menor	1,80	36.636,52
Dos adultos y dos menores	2,20	44.777,96
Dos adultos y más de dos menores	2,60	52.919,41
Tres adultos	1,80	36.636,52
Tres adultos y un menor	2,20	44.777,96
Tres adultos y más de dos menores	2,60	52.919,41
Cuatro adultos	2,20	44.777,96
Cuatro adultos y un menor	2,60	52.919,41
Otros	2,60	52.919,41

Individual beneficiaries or cohabitation units that possess non-corporate assets (excluding their habitual residence) valued above the amounts specified in this table for each configuration of the cohabitation unit will be excluded from accessing the minimum vital income, regardless of the overall net worth valuation.

Unidad de convivencia	Escala de Incrementos	Límite euros
Un adulto solo	1	40.707,24
Un adulto y un menor	1,40	56.990,14
Un adulto y dos menores	1,80	73.273,03
Un adulto y tres o menores	2,20	89.555,93
Un adulto y más de tres menores	2,60	105.838,82
Dos adultos	1,40	56.990,14
Dos adultos y un menor	1,80	73.273,03
Dos adultos y dos menores	2,20	89.555,93
Dos adultos y más de dos menores	2,60	105.838,82
Tres adultos	1,80	73.273,03
Tres adultos y un menor	2,20	89.555,93
Tres adultos y más de dos menores	2,60	105.838,82
Cuatro adultos	2,20	89.555,93
Cuatro adultos y un menor	2,60	105.838,82
Otros	2,60	105.838,82

As mentioned by EAPN Spain in the previous question, **we have no detailed information regarding the method used to set the national minimum income level.** Therefore, we cannot assert if the means-tested thresholds effectively reflect the standard of living in Spain for the different types and sizes of households.

### 3. ACCESS TO AN INCLUSIVE LABOUR MARKET

#### EAPN'S POSITION

Social protection systems remain **mostly accessible for those in stable forms of employment**. Access to the labour market is further limited by income thresholds that do not allow individuals to live independently. People experience poverty's ability to access the labour market is also contingent on shortages in certain sectors, reducing them to **being seen as commodities rather than individuals with rights**.

Some groups are **disproportionally vulnerable to poverty**, as they are excluded from the formal labour market and from most essential or support services, including those specifically designed to assist people experiencing poverty.

**Discrimination and stigma** against people living in poverty remain widely undocumented by the EU. However, the experiences of EAPN members speak for themselves: discrimination and poverty stigma trap people in poverty, increase non-take-up, exclude them from the labour market, and reinforce the criminalisation of poverty by EU Member States.

#### OVERALL ASSESSMENT

- The current MIS models, based primarily on short-term activation and precarious work placements, **do not provide real pathways out of poverty** for many beneficiaries. Structural reforms are needed, starting with the recognition that not all recipients can or should be channelled toward the labour market in the same way.
- The **lack of tailored responses**, especially for the elderly, women with children, people with mental illness, Roma, migrant groups and those in rural areas, must be addressed.
- Without investment in decent work opportunities, accessible services, inclusive training, and non-stigmatising support, the cycle of dependency to short-term support will continue, and the **transformative potential of MI schemes will remain unrealised**.

#### EAPN MEMBERS' ASSESSMENT

In **IRELAND**, people accessing employment face several structural and systemic barriers that hinder access to an inclusive labour market, particularly for groups experiencing poverty or vulnerable communities.

Social benefits are not aligned with main in-work supports such as the One-Parent Family Payment and Jobseeker's Transitional, which have not increased since 2020, despite rises in the National Minimum Wage. This weakens support for low-income workers and may discourage employment.

A system is needed to automatically adjust income thresholds and disregards in line with wage increases as part of the Annual Budget process. Introducing an administrative mechanism to automatically uprate thresholds and disregards annually would help preserve the value of these supports and better align with labour market realities.

**Eligibility rules for Jobseeker's Allowance also create barriers.** The current system is based on days worked rather than hours, which leads to inequitable outcomes, such as disqualifying a person working just four one-hour shifts per week, while someone working 21 hours over three days would remain eligible. Reforming the system to base eligibility on hours worked would better reflect modern employment patterns and support people in precarious or part-time jobs.

Ireland's 'Qualified Adult' system **reinforces outdated gender roles** by denying secondary claimants (mostly women), an independent income, limiting their access to employment supports. A case management approach could enhance financial autonomy and labour market participation.

For disabled people, low employment rates are driven by **the loss of essential supports like Disability Allowance and medical cards** upon entering work. Reforms should include higher income disregards, a universal Cost of Disability payment, and medical cards based on health needs to remove disincentives to employment.

In the **NETHERLANDS**, targeted programmes are in place to support individuals in re-entering the labour market, with a particular focus on early school leavers and young people. These initiatives aim to improve employability through tailored guidance, education, and training opportunities, helping to prevent long-term unemployment and social exclusion among vulnerable youth.

**ITALY's** Inclusion Allowance (ADI) aims to support (re)integration into the labour market through gradual and proportionate activation requirements.

Adults in eligible households who are unemployed and not in education must register with the Social and Labour Inclusion Information System (SIISL) and follow a personalised pathway developed in cooperation with Employment Centres.

Young recipients (18–29) without completed education must attend adult education programmes. ADI allows income from work to be combined with the benefit, up to €3,000 annually. Core financial support includes a supplement to family income (up to €6,000/year or €560/month for elderly/disabled households), and a rent supplement (up to €3,360/year). The allowance is granted for 18 months with a 1-month break, renewable for 12 months. It is suspended during employment spells of up to six months and resumes afterwards.

The benefit ceases if a job offer is refused and it is defined as a full-time (or 60% part-time) unlimited job agreements, or a fixed-term contract within 80 km of residence. Exceptions apply for households with young children.

In **POLAND**, the system supporting minimum income recipients to access inclusive labour markets faces significant challenges.

Unemployed individuals receiving periodic allowances are required to register with labour offices, and social assistance centres often use a “social contract” to encourage activation. However, **refusal to sign or comply with this contract can result in sanctions**, placing additional pressure on recipients. There

are targeted activation programs like Socially Useful Work (PSU), which involves up to 10 hours of community work per week for a very modest allowance, and the Activation and Integration Programme (PAI), which combines PSU with social integration services for a limited period.

Unfortunately, these programs cover only a small fraction of minimum income recipients. Research suggests that some of these programs, particularly PSU, may unintentionally hinder employment prospects, possibly due to stigmatization or decreased motivation to seek paid work. When it comes to combining income assistance with employment, the situation remains difficult. Recipients who take up a job can only continue receiving their full periodic allowance without deductions for a maximum of two months every two years. Although allowances from programs like PSU are excluded from income calculations, enabling some degree of benefit-work combination, very few people manage to maintain full support while working.

In a nutshell, Poland's activation system for minimum income recipients **shows clear limitations:** low participation rates, potential negative effects on employment, limited financial incentives to work, and an absence of thorough evaluation of these measures. **The system is currently ineffective at helping unemployed social assistance recipients move toward sustainable employment.** Meaningful reforms will be needed to create more effective pathways that align with EU guidance on encouraging gradual and supported reintegration into the labour market.

Despite many renewed efforts and a strong commitment to social inclusion, **PORTUGAL** continues to face **significant challenges in ensuring that activation requirements truly support labour market reintegration.**

While the principle of linking social benefits to active job-seeking or training is well established, the current system often falls short of offering sufficient, realistic, and proportionate incentives for people to re-enter the labour market. **The Portuguese Social Integration Income (SII) measure continues to fall short of its ultimate goal: insertion into the labour market.**

Many beneficiaries remain stuck in the system for years, unable to achieve the autonomy envisioned by the measure. A key missing piece is a deeper understanding of the factors that limit autonomy. Insights gathered from professionals and beneficiaries reveal a complex web of obstacles that prevent many from leaving the SII and integrating meaningfully into the labour market.

The economic inadequacy of the SII means that many recipients **must rely on undeclared jobs to survive.** However, declaring this income risks losing essential benefits. This precarious balancing act forces people into informal work, perpetuating poverty and exclusion rather than resolving it.

Moreover, the Portuguese MIS places disproportionate emphasis on labour market activation, often ignoring the structural barriers people face. The highest number of beneficiaries are either children, older adults (over 55), or people with low education (groups for whom stable employment is especially difficult to attain).

In addition, trainings and life-long programmes offered often fails to match people's needs or local employment realities, and there is no comprehensive evaluation of its effectiveness. Even when SII recipients enter the labour market, the jobs available are often temporary, precarious, and underpaid. CEI+



(employment-integration contracts) are frequently abused: no holidays, no contract, no rights. This cycle of low-quality employment deepens frustration and marginalisation, rather than facilitating real inclusion.

When it comes to the most vulnerable amongst the most vulnerable, **people with mental illness are often left behind**. There are no adequate responses for those who cannot work but do not require institutional care. They remain trapped in the system, with little to no prospect of employment or meaningful inclusion.

**Labour market integration hinges the access to essential services.** Many beneficiaries in rural or underserved regions face major hurdles, from a lack of transport to a shortage of childcare or housing. Discrimination, particularly against minority groups such as the Roma communities and migrant groups, adds another layer of exclusion. Even when beneficiaries are trained, employers are often unwilling to hire them.

However, the European Union is not the alone in these challenges. In **NORWAY**, minimum income support is viewed primarily as emergency aid, and no labour market activity requirements are attached to it.

Most recipients already rely on other forms of income support, some of which include activation conditions, while others, such as disability benefits, do not due to the recipients' inability to work. The system deducts any other income from the minimum income payout, leading many to rely on cash-based informal support, including personal loans or withdrawing remaining funds to avoid reductions.

Evidence from Norway shows that imposing activation requirements has not improved recipients' labour market participation, raising important questions about their effectiveness in contexts where barriers to employment are structural or systemic.

## 4. ACCESS TO ENABLING SERVICES AND INDIVIDUALISED SUPPORT

### EAPN'S POSITION

**Access to essential services and individualised support** is fundamental to achieving social inclusion, reducing poverty, and ensuring the effectiveness of minimum income schemes. These elements are not optional complements but integral parts of any strategy aiming to eradicate poverty.

In the same way, one-size-fits-all approaches are ineffective in addressing poverty. People facing multiple disadvantages—such as long-term unemployment, disability, mental health challenges, or discrimination—need **individualised, person-centred support**.

Lack of access to these services often deepens poverty and social exclusion, even when a minimum income is provided. Minimum income schemes alone are not enough— they must be **combined with guaranteed access to affordable, quality essential services**.

### OVERALL ASSESSMENT

- Inequality remains particularly severe for those who are further marginalised, with fragmented approaches and significant regional disparities in service provision.
- Coordination between national, regional, and local authorities is essential to ensure effective and equitable support.
- While energy-related assistance has seen some development in recent years, substantial gaps persist across other essential services.
- Housing insecurity and homelessness are exacerbated by the high cost of private rents and a severe shortage of public social housing.
- Although measures exist to improve access to enabling services for minimum income beneficiaries, the system remains fragmented and inconsistent.
- Rural areas continue to face a lack of access to essential services, including childcare and digital infrastructure.
- Efforts must focus on expanding childcare coverage, reducing regional inequalities, bridging the digital skills gap, and addressing the widespread non-take-up of benefits.

### EAPN MEMBERS' ASSESSMENT

In **IRELAND**, EAPN highlighted the following challenges:

- **Housing and homelessness:** The high cost of private rents and the shortage of public social housing are driving housing insecurity and homelessness. Over-reliance on the private rental sector and inadequate Housing Assistance Payment (HAP) limits leave many low-income tenants unable to meet rental costs, often paying the shortfall from their own limited income. Homelessness continues to rise, reaching 14,159 people (including 4,316 children) in May 2024. There is an urgent need to expand state-provided social housing and adjust housing supports to reflect real rental costs. Housing is a critical issue for disabled people, who face long waits due to a lack of accessible, universally designed housing.

- **Early Years Education and Care (ECEC):** Despite increased investment, Ireland continues to rely heavily on private provision, making ECEC one of the most expensive in the EU. Limited availability, especially for children under two and in rural or disadvantaged areas, restricts access for low-income families, single parents, and women seeking to enter or remain in the workforce. Low wages in the sector are also a concern. There is growing demand for a publicly funded, universal ECEC system.
- **Transport:** Public transport is inconsistent and often inaccessible, especially in rural areas and for disabled people. Reliable and inclusive transport is essential for participation in employment and community life.
- **Health and Social Care for Disabled People:** Disabled people face significant inequality in accessing services due to geographic disparities and income-based barriers. Personal Assistance services—key for independent living—are severely underprovided. Equitable access to such services, based on need rather than location or income, is essential for inclusion and employment.

EAPN **ITALY** highlighted the following challenges when it comes to access to essential services by people experiencing poverty:

- **Expiring National Plans:** Key national plans on social issues (e.g., poverty, non-self-sufficiency) are set to expire in 2024. Recent legislation on differentiated autonomy (Law No. 86/2024) raises concerns about maintaining uniform access to essential services (health, education, transport) across regions.
- **Fragmented Measures:** While there are targeted actions for vulnerable groups (e.g., the elderly, families, persons with disabilities), these measures remain underdeveloped and lack concrete implementation.
- **Poverty Policy Criticism:** Anti-poverty measures have become increasingly bureaucratic and fragmented, with support tied to strict means-testing (ISEE). Benefits are no longer framed as rights, but as conditional, temporary disbursements managed centrally by INPS, reducing the role of municipalities. Caritas and ISTAT report that poverty has reached record levels — 9.8% of the population (over 5.7 million people) live in absolute poverty.
- **Inherited Policies:** Current social protection relies heavily on previously established initiatives (e.g., universal child allowance, early childhood education, disability and gender violence measures), with continued funding for local services and social worker recruitment stemming from prior budgets.
- **Regional Disparities:** While all regions have updated their Economic and Financial Regional Documents (DEFR) between 2022–2023, there is significant variation in the strength and scope of regional social protection commitments. Focus areas include welfare, family, youth, disability, poverty, and the Third Sector.

In **POLAND**, EAPN shared the following insights:

- **Integrated Service Provision:** Social assistance benefits and services in Poland are delivered through municipal-level social assistance centres. In a small number of municipalities, ESF-funded projects aim to transform these centres into integrated social service units. A mandatory household interview is conducted to assess needs and inform the assistance plan. In the reformed social services units, this results in an individualised plan focused on social services. However, there is a lack of formal coordination between the various administrative levels responsible for employment and social services, limiting the effectiveness of integration.
- **Essential Services:** There is no national definition of “essential services” nor specific constitutional guarantees ensuring access. Energy is the only area where a poverty-sensitive approach is well developed. Concepts such as energy poverty are recognised, and support measures include energy supplements and subsidies for thermal retrofitting. For other essential services (water, sanitation, public transport, digital access), there are few national-level targeted measures for low-income households.
- **Health Services:** Uninsured individuals can access health care upon registering with an employment office, signing a social contract, or participating in an individual action plan. Social assistance recipients who do not meet these criteria remain uninsured, and access to free medical care in such cases depends on the outcome of a social worker’s household interview (*rodzinny wywiad środowiskowy*).
- **Housing:** Low-income households are eligible for housing allowances and energy supplements. Recent reforms have focused on improving energy efficiency in housing for vulnerable households.
- **Childcare and Family Support:** Services for families fall under the responsibility of *powiat*-level (county) social assistance units. Low-income families often face barriers to accessing formal childcare, particularly in comparison to higher-income households.
- **Digital Services:** Some municipalities provide free or subsidised internet access for low-income residents. EU-funded initiatives have been implemented to address digital exclusion among disadvantaged households.
- **Public Transport:** National-level support is limited. However, some municipalities offer reduced fares for social assistance recipients or unemployed individuals.
- **Financial Services:** Banks are required to offer basic bank accounts free of charge, although this is not widely implemented. Special family accounts exist for recipients of specific social benefits and are protected from debt collection.
- **Coordination and Integration Challenges:** There is no comprehensive, integrated approach to service provision across the country, aside from some project-based initiatives. Access to essential services is often not directly linked to receipt of minimum income benefits. Coordination between administrative levels and across sectors remains weak.
- **Ongoing Reforms:** Recent reforms, such as the creation of Centres for Social Services (*CUS*), aim to improve local-level service integration. Energy poverty has also gained policy attention, with dedicated task forces and support measures being developed.

Poland has implemented some measures to facilitate access to enabling and essential services for minimum income recipients, but the system remains fragmented. Access and quality of services vary considerably between regions and municipalities. While energy-related support is the most developed area, significant gaps remain in other essential services. Major challenges include lack of service integration, limited inter-administrative coordination, and uneven regional implementation.

In **PORTUGAL**, the following challenges were mentioned by EAPN:

- **Lack of access to essential services in rural areas**, leading to further exclusion, especially from the labour market,
- **Lack of housing availability and affordability**,
- Lack of availability of mental health services,

*“In health, there is a lack of family doctors... in more rural areas, there is not the same access, it is difficult for services to reach people. You have to go the day before to get an appointment.”*

*“We saw decentralisation for local government. I have around 25 parents, with children with special needs and there is nowhere to put their children. There is no rest for the caregiver. This is just theory.”*

EAPN Portugal highlighted the **specific case of the Autonomous Region of the Azores**, which has the highest rate of poverty and social exclusion in Portugal. A Resolution issued by the Legislative Assembly of the Azores (nº 8/2024/A) recommends changing admission rules for childcare centres to give priority to children of working parents. This proposal is based on harmful stereotypes—such as assumptions that non-working parents misuse childcare—and labels vulnerable children (e.g. those receiving the Social Insertion Income, SII) in a stigmatizing way.

Critics argue the proposal undermines the goals of the “Happy Childcare” measure, which provides free childcare to all children born from September 1, 2021, and prioritizes inclusion, especially for disadvantaged families. It contradicts the Child Guarantee’s principle that early childhood education is particularly crucial for children from vulnerable backgrounds.

Instead of limiting access for non-working parents, efforts should focus on expanding childcare coverage and reducing regional disparities, ensuring inclusive access for all children.

In **SPAIN**, the 32 projects implemented under the SGI/MISSM Inclusion Policy Lab focused on a diverse range of inclusion pathways. The most common type (14 projects) centered on job search and entrepreneurship, often combined with training and complementary support. The second-largest group (13 projects) targeted social support and measures to reduce the Non-Take-Up of public benefits. Other projects focused on education (9), integrated approaches spanning multiple areas (7), bridging the digital skills gap (7), and addressing housing needs and energy poverty (1).

The overall evaluation of the Inclusion Policy Lab projects has identified several good practices with strong potential for scaling. While some progress has been made in this regard, the expansion remains limited. For broader impact, the outcomes of the Lab should be addressed jointly by MISSM and other relevant Ministries (e.g., Education, Housing), with the active involvement of the autonomous regional governments (CCAA), who play a major role in service delivery.

As previously mentioned, **effective coordination and cooperation across national, regional, and local levels of government is essential**—not only for aligning the Minimum Income Scheme (IMV) with the regional Minimum Income schemes (RMA), but also to respond effectively to the priorities of the EU Council Recommendation. These include reducing benefit non-take-up, improving access to inclusive labour markets, and ensuring support and essential services reach those in need.

## 5. GOVERNANCE, MONITORING AND REPORTING

### EAPN'S POSITION

Our organisation defends the rights of people experiencing poverty (PeP) and ensures their active participation in the EU decision-making process. **We strongly believe that no legal, policy, or budget initiatives should be taken without the collective decisions about wealth distribution, resource allocation, and the democratic participation of the most marginalised.**

However, when involving PeP in this process, several safeguards must be put in place to prevent an extractivist approach of their experience for policy-making purposes. An extractivist approach in participatory democracy occurs when affected communities are consulted, but their experiences are not reflected in the final stages of policymaking, are used for short-term goals, or are not adequately compensated for the time spent informing policymakers.

### OVERALL ASSESSMENT

- **Governance & consultations**
  - EAPN's concerns regarding governance, monitoring, and reporting highlight several systemic problems in the current models of engagement between the State and civil society on key public policy issues, including poverty and social inequality. These concerns include **the absence of intersectional, multidimensional, and complementary approaches to addressing complex social problems, as well as limited collaborative leadership capacity.**
  - Civil society is often engaged in mechanisms that require significant time and energy but struggle to deliver effective outcomes. There is a clear need and willingness among all participants in collaborative processes to learn from each other. Additionally, there is a lack of clarity around accountability and implementation, alongside insufficient processes to support meaningful participation of people experiencing poverty in public policy development.
  - Even if a consultative framework may exist based on legal and policy initiatives at national and local levels, many existing structures and engagement models are outdated, calling for new approaches that encourage critical reflection and innovative thinking.
- **Financial safety nets:** Member States face significant challenges in ensuring adequate and sustainable financing for their social safety nets, though the nature of the issues differs. While some countries face challenges in restructuring and expanding revenue sources, others may struggle in ensuring equitable and sufficient distribution of existing resources, improving financial planning and benefit criteria. We believe that countries require decisive reforms to secure the sustainability and adequacy of their social safety nets.

## EAPN MEMBERS' ASSESSMENT

### Governance & consultations with stakeholders

In **IRELAND**, there have been a number of problems identified in relation to how the State engages and consults with people affected and the organisations that represent them in relation to addressing key public policy issues, including poverty, social exclusion, and stakeholder participation in the design, implementation, monitoring and evaluation of policy, programmes and schemes.

The 2023 OECD report [\*Strengthening Policy Development in the Public Sector in Ireland\*](#) found that “direct input into policy design by or on behalf of vulnerable communities is uneven at present.” The report recommended “collaborating and/or co-creating with other departments or people likely to be affected by policy decisions.” Feedback from civil servants consulted for the report cited deficits in consultation including uneven rural/urban divide, being invited to engage after decisions are made, greater focus on established and bigger organisations and limited co-creation.

Although the legal framework in **ITALY** encourages the recognition and involvement of civil society, the third sector, and families in the implementation of the social protection system, in practice, this principle is not fully realized.

Legally, collaboration should be based on both vertical subsidiarity (involving various levels of government such as municipalities, provinces, regions, and the state) and horizontal subsidiarity (engaging non-governmental actors and citizens).

However, local public institutions and third sector stakeholders are generally not involved in the evaluation of Minimum Income measures. In practice, only the Parliament initiates consultations that include civil society organisations, while the Government limits its consultations primarily to trade unions.

Based on feedback from our members in the **NETHERLANDS**, civil society actors have launched several initiatives, funded by the Ministry of Social Affairs and Employment, to collaborate with municipalities and harness the expertise of experts by experience. One such project is led by EAPN Netherlands and aims to ensure that people with lived experience are actively involved both in the implementation and the policy-making processes related to the Participation Act and the Social Domain more broadly.

In **POLAND**, social partners such as trade unions and employers' organisations are involved in setting income thresholds for social assistance benefits every three years.

However, they struggle to reach a collective decision, as trade unions propose more ambitious measures that employers oppose, limiting their influence on government proposals.

**Civil society organisations and social economy actors have limited involvement in the design, implementation, monitoring, or evaluation of minimum income schemes** beyond advocacy and lobbying for specific reforms.



Municipalities exercise some local autonomy by having discretion in implementing social assistance and setting local measures related to access to services like public transport or digital services. Monitoring and reporting include annual data submissions through an official data reporting tool, aggregated by the Ministry of Family and Social Policy, though the data format is cumbersome and not conducive to thorough analysis. Local governments are also required to prepare assessments of social assistance resources, but these reports lack evaluation of the effectiveness and efficiency of social assistance expenditures. Overall, while there is some stakeholder involvement, especially at the local level, there is no robust system to empower a broad range of stakeholders comprehensively across all aspects of Minimum Income Schemes.

Prior to the launch of the national Minimum Income Scheme in 2020, EAPN **SPAIN** and other third sector organisations were consulted to some extent, reflecting the government's intention to involve relevant stakeholders in policy evaluation and improvement.

The Advisory Council of the MIS, legally established in 2022, includes representatives from key ministries, social partners, and civil society organisations, including EAPN, providing a suitable forum for the governance and monitoring of the MIS. Beyond the institutional consultative framework, EAPN-ES and its members organised a total of 24 seminars between 2023 and 2024, attended by over 1,300 participants from civil society, academia, and government at all levels.

These seminars have served to share fieldwork and research findings, discuss barriers to accessing the MIS, identify necessary improvements, and develop inclusion pathways with beneficiaries.

In **PORTUGAL**, the current National Anti-Poverty Strategy aims to improve the measurement of the SII (Social Inclusion Income) and explore the possibility of defining a single social benefit. However, defining such a benefit should only follow a thorough and participatory review of the SII.

Previous assessments have not led to meaningful improvements, largely due to political influences rather than evidence-based studies. The transfer of social action powers to municipalities has further altered how the measure is implemented, but there remains a lack of clear, transparent information about these changes.

Moreover, after this transfer of competencies, no additional guidance was provided for monitoring the measure.

## IMPACT OF AUSTERITY MEASURES

When it comes to financial of social safety nets, **IRELAND's** social protection system and public services require increased tax revenue to sustain public finances, moving beyond the current dependence on potentially temporary corporate tax windfalls. As a low-tax economy, Ireland's tax-to-GDP ratio stood at 22% in 2021, which is half the EU average and significantly lower than similarly wealthy countries. To adequately finance the welfare state, the state should implement progressive tax increases and broaden the tax base sustainably to align tax levels closer to the EU average. A positive step has been taken with the planned 0.1% increase in all Pay Related Social Insurance (PRSI) contributions starting October 2024, aiming to reload the Social Insurance Fund and improve its long-term sustainability through a phased approach.

Our members in **POLAND** have analysed that the financing of social assistance is shared between central and local governments, with only 50% of periodic allowances covered by the central government and many

municipalities unable to fund the remainder, resulting in inadequate income support. Local governments also face budgetary constraints, such as debt limits, which restrict financing for measures like thermal retrofitting of housing. Additionally, some government subsidies, like the energy supplement, have been underutilised, with only 11.8% to 15.1% of planned funds spent between 2014 and 2016. There is no comprehensive assessment of the adequacy of social safety net financing relative to overall public finances. Furthermore, the discretionary setting of income thresholds for family benefits and social assistance every three years has led to benefit levels falling below the extreme poverty line, highlighting insufficient funding.

## 6. CONCLUSIONS AND RECOMMENDATIONS

### EAPN'S CONCLUSIONS

The **ADEQUACY** of Minimum Income Schemes (MIS) is crucial to ensuring they effectively support people experiencing poverty. EAPN advocates for MIS levels that are above the at-risk-of-poverty threshold, calculated based on reference budgets that reflect real living costs, and are automatically adjusted to inflation. Minimum income must guarantee a life in dignity, not merely basic survival. Adequacy must be viewed as a non-negotiable principle, essential to reducing poverty and promoting dignity and social inclusion.

MIS must be **ACCESSIBLE** to all who need them, free from discrimination or unjustified barriers. While the 2023 Council Recommendation encourages improved access, it allows for restrictive eligibility criteria, such as residency requirements, which risk excluding the most vulnerable. Social protection systems remain largely geared towards those in stable employment, leaving many excluded. Moreover, income thresholds often prevent individuals from transitioning to independent living or accessing the labour market. The ability of people experiencing poverty to work is frequently contingent on sectoral labour shortages, reducing them to commodities rather than rights-holding individuals.

Certain groups, such as Roma communities, refugees, undocumented migrants, face disproportionate vulnerability due to exclusion from the formal labour market and essential services. These groups are often left out of systems designed to assist people in poverty, deepening their marginalisation. **DISCRIMINATION AND STIGMA** against people living in poverty remain largely undocumented at EU level. However, EAPN members consistently report that stigma increases non-take-up, restricts access to employment, and fuels the criminalisation of poverty. Tackling these systemic barriers is essential to ensure inclusion and equity.

MIS alone are not sufficient. They must be combined with guaranteed access to affordable, quality **ESSENTIAL SERVICES**, including housing, health, childcare, and education. These services are not optional add-ons but integral components of any effective poverty reduction strategy. A one-size-fits-all approach cannot address the complex realities of poverty. People facing multiple disadvantages, such as long-term unemployment, disability, or mental health challenges, require individualised, person-centred support. The lack of such services undermines the potential of MIS to reduce poverty and foster inclusion.

While **DIGITALISATION** can enhance the accessibility of social protection, it also risks deepening exclusion, particularly when digital access becomes the only method of engaging with MIS. Digital tools must be provided as an option, not a requirement. Alternatives must remain available to ensure inclusive access for all. EAPN report [“An Exploratory Study on the Use of Digital Tools by People Experiencing Poverty”](#) examines the current landscape surrounding the digitalisation of essential services and its impact on people experiencing poverty. It will also explore the consequences of the use of AI by European Member States on the access to social protection schemes and support services.

EAPN defends the rights of people experiencing poverty and promotes their active **PARTICIPATION** in EU policymaking. We maintain that no legal, policy, or budgetary decisions should be made without the inclusion of those most affected, through collective processes that uphold democratic participation and address structural inequalities in wealth and resource distribution. However, genuine participation must avoid extractivist practices, where individuals' experiences are solicited but ignored in final decision-making, used merely for short-term political gain, or not fairly compensated. Effective and ethical

participation requires clear safeguards, which we outline in the next section, to ensure meaningful, respectful, and sustained engagement with people experiencing poverty.

Despite calls in the Council Recommendation to reduce non-take-up, EAPN regrets the lack of concrete measures targeting the most marginalised. Non-take-up remains widespread among groups facing the greatest barriers to access, and urgent attention is needed to close these gaps.

## EAPN'S RECOMMENDATIONS

Based on the assessment of EAPN's members, we recommend the European Commission to focus on the following areas for improvement of MIS:

- **ADEQUACY:** At the heart of a fair and inclusive society lies the principle that everyone should be able to live a life in dignity. To achieve this, Minimum Income Schemes (MIS) must be adequate, accessible, and empowering. Adequacy is the starting point. MIS must be set above the at-risk-of-poverty threshold, grounded in reference budgets that reflect the true cost of living. They should also be automatically adjusted to inflation, ensuring that support does not erode over time and people can meet their basic needs consistently.
- **ACCESSIBILITY:** But adequacy alone is not enough. MIS must be universally accessible, free from discriminatory criteria or bureaucratic hurdles that exclude those most in need. This includes dismantling restrictive practices, such as residency or documentation requirements, which disproportionately affect Roma communities, refugees, and undocumented migrants. True universality means that no one is left behind.
- **ESSENTIAL SERVICES:** We must also recognise that minimum income is only one part of the solution. Without guaranteed access to essential services, such as healthcare, housing, childcare, education, and energy, income support cannot fulfil its role in promoting inclusion and breaking the cycle of poverty. These services are not optional add-ons; they are pillars of a life in dignity.
- **STIGMA AND DISCRIMINATION:** In parallel, we must confront the pervasive stigma and discrimination experienced by people living in poverty. Too often, their voices are silenced, their struggles criminalised, and their identities reduced to stereotypes. We need to document, acknowledge, and challenge these forms of structural bias, shifting from blame to rights-based support.
- **PARTICIPATION** is another crucial pillar. People experiencing poverty must be active co-creators of the policies that shape their lives. However, this participation must be meaningful, not extractive. It is not enough to consult; their contributions must be reflected in decisions, and their time, insights, and experiences must be respected and compensated. Participation without power is tokenism—we must do better.
- **DIGITALISATION:** In a rapidly digitalising world, we must also remain vigilant. While digital tools can improve access, they can also exclude those without the means or skills to navigate them. Digital procedures should always be optional, with offline alternatives that preserve dignity and autonomy.
- **NON-TAKE-UP:** Finally, a critical issue persists: non-take-up. Many people who are entitled to minimum income simply do not receive it, either because they are unaware of it, intimidated by

the process, or discouraged by stigma. Tackling non-take-up requires targeted outreach, simplified procedures, and a specific focus on those facing the highest barriers to access.

These principles are not theoretical, they are practical requirements for justice. Ensuring that Minimum Income Schemes are adequate, inclusive, and respectful of people's rights is not just about alleviating poverty. It's about building a Europe where everyone matters.

They should be read **as a complement to our recommendations formulated ahead of the launch of the first-ever EU Anti-Poverty Strategy of the EU<sup>6</sup>**:

- Initiating **the design of an EU Directive on Minimum Income** with minimum standards for coverage, accessibility, adequacy, enabling characteristics, and automatic adjustments to reflect living costs.
- **Using the MFF post-2027 to improve adequacy, accessibility, and enabling characteristics of MIS across all EU Member States**, ensuring dedicated funding for the design, reform, and implementation of minimum income schemes and the structural strengthening of social protection systems.
- Encouraging Member States to **reform their tax systems** to ensure sustainable funding for adequate MIS, for instance, through the European Semester Country Specific Recommendations (CSRs).
- Ensuring that minimum income schemes in EU Member States **also apply to pensions**.
- Implementing targeted, integrated measures to **address the non-take-up** of MIS and other social schemes.
- Guaranteeing **automatic adjustments** of MIS, pension schemes, maternity, paternity and parental leave benefits, and other social schemes in response to inflation and changes in the cost of living.
- Maintaining the issue of the **gender pension gap** as one of the priorities of the EU Gender Equality Strategy post-2025 and ensuring synergies with the EU APS.
- Ensuring the **full implementation of the Council conclusions of 20 June 2024 on pension adequacy**.

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<sup>6</sup> [EAPN Position Paper Towards the eradication of poverty – EAPN's vision and recommendation on the EU Anti-Poverty Strategy](#)



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