

EAPN RESPONSE

To the European Commission's Proposal for a **COUNCIL RECOMMENDATION ON THE INTEGRATION OF THE LONG-TERM UNEMPLOYED INTO THE LABOUR MARKET**

The European Anti-Poverty Network brings together tens of thousands of civil society organisations in over 30 countries, and has advocated for over 25 years for a Europe free of poverty and social exclusion, with and on behalf of those experiencing them. While employment is not always a safeguard against poverty, and constitutes just one element of comprehensive, integrated anti-poverty strategies, supporting people towards quality jobs and inclusive labour markets is a fundamental pillar of our work. In this context, we welcome the European Commission's proposal for a Council Recommendation aimed at easing the reintegration on the labour market of those who have been unemployed for longer than 12 months. EAPN considers the proposal very useful and timely, and welcomes a number of positive elements put forward. However, it also considers that some of these elements could have been further explored and complemented, and that some important dimensions of the challenge have been overlooked. In the following, we would also like to draw the attention to some missed opportunities to make this initiative fit for purpose.

The initiative should be aimed primarily at the social inclusion and social participation of individuals, and at contributing to their overall wellbeing and dignity

According to EAPN, a life free from poverty, as well as broader social inclusion and social participation, is the ultimate objective, and quality employment is just one element. While impact on poverty and social exclusion and on the erosion of skills and self-confidence is explicitly mentioned, as well as the links to income support and services, the approach is still rather narrowly employment-focused. When incentives to work are mentioned, they tend to be only financial, which contradicts the assumption that people want to work, to contribute and to feel useful, beyond financial gain.

Personalised, pathway approaches are what's needed – but not without the involvement of the beneficiary

EAPN has been staunchly advocating for individualised, pathways approaches towards social participation and labour market inclusion, based on integrated Active Inclusion approaches. The proposed courses of action, involving stepped-up registration of the unemployed to ensure better coverage, personalised approaches and tailor-made inclusion plans, one point of contact, and close involvement of employers, are all welcome steps in the right direction. However, nothing is said in the proposal about the involvement and ownership of beneficiaries of the proposed individualised plan, whereas engagement with the person and devising together the reintegration process is fundamental, not only as a matter of transparency and good governance, but also to ensure empowerment, as well as suitability and effectiveness of the intervention.

Comprehensive services and support towards the labour market are only two of the three pillars of an integrated Active Inclusion approach – what is missing is adequate minimum income and other income support

Explicit recognition is given that over 75% of the long-term unemployed are no longer covered by unemployment benefits, however, the proposal makes only passive references to income support, the main focus being on service delivery. The existing references relate rather to linking benefits to participation in active labour market measures. This approach undermines the holistic implementation of integrated Active Inclusion strategies, as it only features two of the three pillars – access to services and inclusive labour markets. Additionally, it undermines people’s capacity to engage with active labour market policies, in the absence of adequate financial resources to lead dignified lives.

Holistic supportive services that go beyond employment are welcome – but one stop shops are not enough to ensure quality beyond simplified delivery

The proposal explicitly highlights the need to provide a comprehensive package of services, including job search assistance, validation of non-formal and informal learning, rehabilitation, counselling and guidance, education and training, work experience and social support services such as early childhood education and care, health and long-term care services, debt counselling, housing and transport support. While this is very welcome, an emphasis is placed on one-stop-shops from an administrative, delivery perspective, without looking at the broader picture of providing integrated, quality policies and strategies that are aimed at meaningful inclusion beyond simplifying delivery, and for the benefit of the user.

Mutual responsibilities approach and linking benefits with activation may be a gateway to negative activation practices, featuring conditionality and sanctions that increase hardship

Activation practices in recent years have been characterised by tightened eligibility and conditionality, as well as sanctions – which is damaging, increase poverty removing a stable financial foundation to look for work, and does not contribute to ensuring people’s socio-professional inclusion. Integrating income support with activation services could increase this if it’s done from a people’s perspective. The proposal speaks about mutual responsibilities and enforcing conditionalities, such as linking the receipt of benefits with participation in active labour market policies and acceptance of a ‘suitable job’ – which can potentially open the door to very harmful negative activation practices.

Job creation, as well as the overall quality and sustainability of jobs proposed, are not mentioned in the proposal

While there is clear recognition that only half of those who find a job manage to escape poverty, the proposal for Recommendation does not mention quality indicators, which would look at more than the sheer number of long term unemployed reintegrated into the labour market. Some evaluation mechanisms are specified (the development by the Employment Committee of indicators, assessment of the Public Employment Services performance and exchange of good practices, use of funding etc), but the focus on quality and sustainability is missing. Equally, while the proposal targets both the supply and demand sides, nothing is said about where would the jobs be supposed to come from, or how employers will be persuaded to take on people who are most vulnerable and excluded from the labour market.

More resources, financial and other, are needed to effectively tackle this challenge

The document mentions making effective use of existing funding instruments, such as the European Social Fund (ESF), the European Regional Development Fund (ERDF) and the European Agricultural Fund for Rural Development, but no additional funding is mentioned to support these measures. Also, the proposal puts a lot of emphasis on financial incentives, and mentions dedicated services (screening of job vacancies, workplace mentoring and training and post-placement support), without mentioning how sustainability will be achieved. Involving employers is crucial, but also anti-discrimination training, support for adapting working environments and conditions, as well as follow-up support and advice. Finally, the capacity of Public Employment Services needs to be improved, including additional staff, but also better preparation and training for staff to deal with people who have been out of the labour market for a long time. All these are key factors, particularly in a climate still dominated by a narrative of austerity and cuts.

The role of civil society organisations working with and on behalf of those furthest from the labour market is not defined, or even mentioned

There is no explicit role and involvement for civil society organisations in the design, delivery, and evaluation of the proposed initiatives, and no role given to NGOs and social enterprises – as employers, but also as key stakeholders. Conversely, these organisations have a wealth of knowledge and experience in working directly with beneficiaries, and the social economy sector has provided alternative forms of employment (whether as a stepping stone to the open labour market, or permanent) for key groups facing multiple obstacles when engaging with the world of work and with labour markets.