



Building Security, Giving Hope

EAPN Assessment of the National Strategic Reports on Social Protection and Social Inclusion (2008-10)

*Produced by the EAPN Social Inclusion Working Group
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Introduction: Who is EAPN?

The European Anti Poverty Network (EAPN) was established in 1990 as an independent network of NGOs committed to the fight against poverty and social exclusion. The focus of EAPN activities is on the fight against poverty and social exclusion within the EU Member States. EAPN has been a key actor in the Social Open Method of Coordination (Social OMC) representing grass-roots civil society actors and people experiencing poverty involved in anti-poverty platforms at national, regional and local levels. It has lobbied for and engaged with the Social OMC and for the mainstreaming of social concerns in all relevant policy fields. Currently receiving financial support from the European Commission through PROGRESS, EAPN counts on a membership of 25 National Networks and 22 European Organizations, engaged actively in the work of EAPN through thematic working groups. (See www.eapn.eu for more information).

EAPN's key objectives are:

- To put the fight against poverty and social exclusion on the political agenda of the European Union.
- To promote and enhance the effectiveness of actions against poverty and social exclusion.
- To lobby for and with people and groups facing poverty and social exclusion.

EAPN's role in the OMC on Social Inclusion and Social Protection

EAPN actively lobbied for an EU Inclusion Strategy, based on the model of the European Employment Strategy. With the Lisbon and Nice Councils of 2000 such a strategy was adopted and is now known as the OMC on Social Protection and Social Inclusion. Since then, EAPN's members have actively engaged in this strategy and in particular in the National Action Plans on Inclusion (NAP Inclusion) which is a central part of this strategy. At EU level and in many Member States, EAPN has come to be regarded as a key stakeholder and partner in this strategy. At EU level, apart from the production of yearly assessments of the development and implementation of the NAP Inclusion, EAPN has inputted into and responded to all key documents produced by the Commission in relation to the strategy and have thus built a constructive and lively dialogue with the Commission, SPC and other key actors.¹

For EAPN, participation of people experiencing poverty in decision-making processes is not only an essential social right but a crucial instrument for effective policy development and delivery. EAPN has been at the forefront of promoting direct dialogue between people experiencing poverty with national and EU decision-makers. At EU level, EAPN has assisted the Member State holding the Presidency of the EU to organize yearly People Experiencing Poverty Meetings involving over 200 participants which bring together key EU and national decision makers with people in poverty from across the EU.² In many member states, EAPN has pioneered the development of similar meetings and other forms of dialogue between people experiencing poverty and national decision-makers.

¹ See EAPN Website for EAPN assessment reports on the NAP Inclusion from 2001: www.eapn.eu.

² See Reports from People Experiencing Poverty Meetings: 2001-8, www.eapn.eu.

EAPN proposals for the NAP Inclusion 2008-10

In 2007, the EAPN Social Inclusion Working Group evaluated the “process, activities and impact on poverty of the 2007 thematic light year³ of the EU strategy. The report commented specifically on the light year theme of child poverty, highlighting the need to prioritise supporting families out of poverty and children’s and parent’s rights, integrated active inclusion approaches, rooted in adequate incomes and access to services. The report also included an assessment of progress on the implementation of the NAP Inclusion as part of the 2006-8 National Strategic Reports. Apart from specific recommendations on the thematic areas, overarching recommendations were made on the need to:

- strengthen the overarching framework of the social dimension of the Lisbon strategy
- revitalise the OMC as a dynamic, participative and strategic tool
- develop specific new tools and instruments.

In 2008, EAPN responded to the Commission’s Guidance Note for the preparation of the 2008-10 National Strategic Reports on social protection and social inclusion and provided an input to the Commission’s proposals on Reinforcing the OMC⁴. In these documents, EAPN highlighted the need to ensure an effective strategic planning process, which embedded an on-going structural dialogue with civil society and other stakeholders, including people experiencing poverty in order to develop together effective anti-poverty strategies. These needed to draw on new and stronger tools for delivery, monitoring and implementation.

This present report builds on this history of engagement in the EU Inclusion strategy (OMC Social Protection and Social Inclusion) and assesses the National Strategic Reports on Social Protection and Social Inclusion 2008-2010.

Acknowledgments

This report is based on the 18 questionnaires received from EAPN members assessing the National Action Plans on Inclusion and National Strategy Reports on social protection and social inclusion from the following member states: Austria, Belgium, Bulgaria, Czech Republic, Denmark, France, Germany, Hungary, Ireland, Malta, Norway, Poland, Portugal, Rumania, Spain, Sweden, United Kingdom and from the European NGO, FEANTSA. The draft report was discussed in the EAPN Social Inclusion Working Group meeting held in Brussels on the 7 and 8th November 2008, and further findings from that discussion are incorporated in the final report. Please note that a supporting document with additional country specific information on which the analysis below is drawn is available on the EAPN website (www.eapn.eu).

We would like to thank Pauline Geoghegan for her valuable work in the initial assessment of the EAPN responses and to Sian Jones for drafting the final report, with the support of the EAPN Team.

³ See “Light Year, Hard Work: EAPN progress report on the implementation of the Strategic Report on Social Protection and Social Inclusion (2006-8)

⁴ See EAPN response to Commission’s Guidance Note and “Reinforcing the OMC – EAPN input.

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A) Executive Summary

1. Why the EU isn't delivering on poverty?

The overwhelming concern of EAPN members is the lack of progress on the eradication of poverty in the EU. This represents to most a major loss of faith in the EU and its commitment to make a decisive impact on the eradication of poverty and social exclusion by 2010. Although the Social Open Method of Coordination (Social OMC) is potentially a powerful instrument to deliver this goal, and has encouraged an important exchange and awareness-raising amongst member states, this is clearly not enough. The National Strategic Reports on Social Protection and Social Inclusion should be a key instrument of the Social OMC to galvanize dynamic national action plans rooted in partnership between member states and their respective stakeholders, through an active strategic planning process. The problem is that this is not happening. The current financial and economic crisis is likely to make the poor pay most, unless the EU and Social Ministers take the lead and insist on a collective response which puts social protection, reducing inequalities and investing in people, at the heart of a new vision for the EU.

5 Overarching Challenges

- We need an open debate on the causes and consequences of the failure of the revised EU Lisbon strategy on "Growth and Jobs" to deliver on social cohesion, even in times of boom. There can be no more faith in a largely unregulated market, to generate enough good jobs and security for those who cannot work.
- To ensure that a Social and Sustainable Recovery Package is promoted which as well as addressing the needs of businesses and banks also tackles the impact of the crisis on people experiencing poverty and social exclusion.
- To develop a new vision for an EU agenda post 2010 based on an integrated social and sustainable model, which addresses the recognized flaws of the current model.
- The political will to put the eradication of poverty and social exclusion and the promotion of a more equal society based on social and economic rights at the centre of the EU agenda.
- The importance of political leadership to make these debates happen and to seize on the potential of the social OMC to actively engage stakeholders and ensure policy impact on poverty as well as the promotion of mutual exchange and learning.

New threats to economic and social cohesion

The credit crunch and financial crisis, is leading to economic recession. The inescapable consequence is now increased poverty and social exclusion. Not only will recession mean more people out of work, but the first to go will be those in precarious, poor jobs which will not be covered by restructuring packages. Those that are lucky enough to keep their jobs are likely to find themselves in increasingly precarious positions with downward pressure on wages and demand for increasing flexibility. Governments will need to recuperate public deficits caused by the financial bail-out packages, to meet the requirements of the Stability Pact. The worst case is that Member States recover public deficit by reducing social assistance and protection levels. This combined with reduced purchasing power, particularly for those on benefits, and rising debt is likely to drive millions more below the poverty line, with minimal fall-back in terms of safe, reliable credit and support to reduce debt. A significant number will be pushed into severe deprivation. These new developments require

urgent new answers from the EU. They also hand a very specific responsibility of leadership to Social Ministers and EU decision-makers and require commitment to reinforce the Social OMC. Although the National Reports were drafted before the explosion of the crisis in the autumn of 2008, the signs were already there (in the crisis in the mortgage markets, rising prices and increasing financial instability). But hardly any of the reports recognize this crucial new political and economic context. EAPN urges the Commission and SPC to ensure that the Joint Report 2009 demands and makes specific proposals for a social and sustainable response to the current crisis, building on the needs to deliver the commitment on eradicating poverty. A specific short report on the impact of the crisis should be agreed to be delivered by each Member State through a stakeholder process as part of the OMC.

The change we need

But the threats of the current crisis must not be seen as inevitable. **Change is possible.** The current political and institutional context of the EU offers vital lifelines for common EU coordinated action that must be actively seized, building on key current EU instruments. This must take place in a much broader discussion about the future of the EU we want, and how to get there.

The National Strategic Reports and the National Action Plans on Inclusion can be a vital instrument to support this change, but to do so, they must be taken more seriously. A reinforced OMC will need a stronger NAP Inclusion and Action Planning process for National Strategies linked to National Anti-poverty strategies, as well as better instruments for implementation and capitalizing on mutual learning, if it is to have a chance of rising to the current challenges.

In the following section we highlight our Key Messages and Recommendations for the Joint Report on Social Protection and Social Inclusion 2009, drawn from our members reflections on the National Strategic Reports, in particular the section of the reports dealing with social inclusion (National Action Plans on Inclusion).

2. EAPN Key Messages

- **Little progress on poverty**

In general terms, there is no significant progress on poverty. Whilst, in some Member States, there are some modest improvements in at risk of poverty levels, this is often matched by deterioration in the poverty levels for specific groups particularly the unemployed, people with disabilities, families with children and lone parents, migrants and ethnic minorities, and in some member states - older family members. In some member states, poverty and inequality is actually increasing.

- **Consensus on priorities but not integrated strategies**

Most reports mirror the priorities agreed at EU level (e.g. the Joint Report on Social Protection and Social Inclusion 2007). The clear winner is Activation (generally not active inclusion), followed by child and family poverty, housing and homelessness, and ethnic minorities/migrants if grouped together. But these sometimes seem to have less to do with real national priorities and more a desire to fit with the Commission's approach. There is some better focus on migrants, older people and youth and some increased focus on disability. However, there is a general tendency for even these thematic priorities to be focused on employment rather than holistic approaches to the specific social inclusion needs of these target groups. Although the influence of the EU debate is clear – particularly in the increased focus on child poverty, the implementation is often weak. The focus on priorities runs the risk of being disconnected from an overarching strategy to fight poverty and social exclusion.

- **Reports not plans, low commitment by Member States**

EAPN is strongly dismayed by the apparent lack of seriousness with which some Member States appear to have taken the process this year: with only 6 Member States submitting their National Strategies by the agreed date. Even by the end of the month there were only 15 submissions. Meanwhile in the National Reform Programme process, two weeks after the deadline - 22 Member States had submitted their NRP reports. Member States have yet to demonstrate convincingly their commitment to reinforcing the Social OMC. This lack of seriousness reflects the fact that most National Strategies lack **any real strategic or forward planning component**, despite the detailed Guidance Note to this effect, prepared by the Commission. They continue to remain a mere description of current and past national policy activities. Such an approach will not help to achieve the commonly agreed objectives, and undermines any stakeholder interest in the process. "*Why get involved to influence a report on past activities?*"⁵. Unless an adequate strategic planning process is put into place, there will be no momentum to deliver any new impact on poverty. Although Member States are wary of giving the NAP a stronger role in developing new policy solutions, pleading subsidiarity, EAPN members emphasize the **missed opportunities for progress on the eradication of poverty**. The NAP and Strategic Reports must be **directly linked to the National Planning Cycles and be affirmed as Government Policy** (discussed in both the National and European Parliament). The NAP and the OMC should be used as tool to support the National Policy Planning process and a key opportunity to "*create an open wedge to discuss poverty and develop new solutions in a partnership approach with key stakeholders*". (EAPN UK)

- **Need for progress on regional and local action planning**

⁵ Comment from EAPN Discussion, Social Inclusion Working Group meeting – 13th November 2008.

In some cases, members highlight that regionalization appears to be threatening the development of coherent National Action Plans process and content, undermining policy delivery. But some Member States are rising to the challenge and using the new regionalism and decentralization trends to drive a more dynamic and coherent agenda, through Regional and Local Action Plans. As most services are planned and delivered at local level, the link between the local, regional and national level, must be more carefully articulated and consolidated by the engagement of all relevant actors including NGO's and people in poverty.

- **Some progress on targets and indicators but no clear link to financing.**

Following the advice of the Commission's Guidance Note, there is some evidence of an increase in specific targets on risk of poverty and for specific groups. However, the targets are often too general and in some cases point to existing levels rather than targets for the future. There is often little indication on how the targets were chosen, how they will be achieved, where the responsibility will lie, or how they will be funded. Doubts were also raised about whether the right targets were being chosen and how far they were contributing to an integrated anti-poverty and social exclusion strategy. i.e. having a target for poverty reduction for a specific group, without first setting an overall poverty reduction target. Meanwhile, in relation to indicators, some members highlight a better use of indicators and more transparent monitoring. However, many emphasize the need for more and better indicators and a clearer strategy for monitoring and using indicators to drive implementation, with the involvement of stakeholders. Less progress has been made in specifying how objectives and targets will be funded, and through which budgets and financial mechanisms. Budgets tend to reflect past expenditure, rather than future priorities and lack detail. There is limited reference to the use of Structural Funds, and only in relation to labour market integration. This appears a missed opportunity to ensure that Structural Funds are used to promote active inclusion and broader social inclusion approaches.

- **2010 – Little signs of momentum building**

2010 should be the reference year for the NAP and Strategic Reports, both marking the end of the period set in Lisbon when the EU should have made a decisive impact on the eradication of poverty, and through the preparation of activities and a clear legacy for the European Year. This is invisible in most NAPs. However, this does not mean that Member States are not making preparations and developing plans with stakeholders. It does however highlight the lack of priority given to the issue, the lack of coordination with the bodies organizing the year and analysis of how the EU 2010 Year is to be linked to the NAP and the social OMC process. If 2010 is to have a legacy, it has to build on the key priorities and gaps identified at national and EU level and use governance structures to deliver concrete outcomes. The ambition for the 2010 year must reflect a new ambition for post 2010 Lisbon agenda and for the Social OMC.

- **Missing themes and priorities**

The major policy gap, highlighted by most members, is an **overarching strategy to fight poverty**. Often it is difficult to realize that the priorities are meant to be part of a general strategy for fighting poverty and social exclusion. Members note a lack of political commitment or visibility of the NAP as a key instrument to fight poverty. It continues as a report not a plan, describing current or past actions, with little evidence of an integrated, multidimensional strategy to fight poverty and social exclusion.

There are also some important specific poverty risks that are missing or not given sufficient emphasis:

- **Real and potential impact of economic decline** – cost of food, fuel, impact on social protection systems and cuts to vital health and social services, increasing precarity and unemployment without adequate income.
- **The increasing withdrawal of the state from welfare provision** and social protection - the grave consequences for people in poverty.
- **Solutions for tackling Energy Poverty and rising prices on falling real incomes.**
- **A transparent analysis of the causes of poverty and inequality** – assessing the role of tax and other redistribution mechanisms.
- **Indebted families/insecure lending, extortion** and inadequate credit facilities.
- **Inadequate income** – lack of rights focus and declining real levels of income.
- **Inadequate focus on Migrants and undocumented migrants** – unaccompanied minors and ethnic minorities.
- **Discriminatory access to services**, e.g. educational resources for asylum seekers.
- **Increasing health inequalities** – including dental care, in terms of affordability, but also discrimination in access and quality of services for specific groups.
- **Inadequate implementation of rights to services**, particularly affordable and accessible housing.
- **Employment as a tool for inclusion and well-being**, not just an instrument for the economy.

- **Some progress but inadequate implementation on Child Poverty**

Some progress has clearly been made on recognizing the importance of this policy area, as a majority of member states prioritize Child Poverty. This clearly reflects the influence of EU debate and exchange. But what have been the actual outcomes on Child Poverty? There is an increase in targets, and more explicit recognition that children in poverty are part of low-income families. There are more measures related to early years and school drop-out. Some increase in measures to increase childcare and other services. There is a more notable increase in the development of so-called “integrated” strategies. But has this resulted in less child poverty? Most strategies ignore the key lessons from mutual learning on child poverty as reflected in the recommendations of the Joint Report and the EU Child Care report; that the Member States that have least child poverty are the same ones with low risk of poverty and reduced inequality. These are the countries that have invested in families with the provision of universal services to the family, including childcare. Social protection is fundamental to take families out of poverty. The majority of schemes lack ambition, adequate budgets and financing instruments. Equality does not come cheap. Success depends on starting from the right of every child and family to a decent life. Implementing pro-active measures to address discrimination and ensure that every family and child gets access to adequate income, housing, access to education and other essential services. It is vital to put children’s rights at the centre, and implement the UN Declaration on the Rights of the Child which the EU has signed up to. Too many of the “strategies” represent a disconnected list of measures with limited approaches. Exchange is not enough. It is time to raise the bar on delivery.

- **Activation not Active Inclusion**

Despite the hype at EU level, the evidence from most Member States is that Active Inclusion is still not being addressed in a holistic form. The overwhelming focus is on boosting the employment rate of specific groups. The main loser, in terms of integrated approaches, is adequate income, with little obvious link to accessing services. There is also a minimal analysis of the impact of the current crisis on purchasing power – energy/food/housing. No reference is made to the need to strengthen social protection financing and challenge inequality through progressive tax/redistribution mechanisms. The

main progress in on positive activation – with new methods for helping people on the margins into employment, but there are concerns about creaming and how far these jobs take people out of poverty. Although initiatives on different services are highlighted, there is a lack of a clear analysis of the strategic function of “flanking services” – crucial if the barriers to sustainable work are to be overcome, as well as ensuring a dignified life for all. Often the measures are marred by inadequate funding and a lack of a clear rights base.

- **Positive Activation measures marred by punitive conditionality**

Some **positive new approaches to activation are evident**, which support those furthest from the labour market: through personalized pathway approaches, active case management and multiple service delivery. However, this is too often linked to **increased conditionality – resulting in reduced or cut benefits when people fail to get or take up jobs offered**. This approach is increasing hardship for people in poverty, rather than helping them into sustainable jobs. A worrying development is a tougher focus on the “**inactive**” (**those not on unemployment registers – people with long-term sickness or disabilities, retired people, lone parents with young children. etc**). In many countries, these groups outnumber the official unemployed. The main priority too often appears to be getting people off benefits rather than into a decent job. Many of these approaches fail to recognize the complex multiple barriers that people on the edges of the labour market face. An increased focus on skills is welcome, but does not sufficiently recognize individual needs or adequately reach those furthest from labour market.

- **Little focus on creating jobs for people in poverty**

There are few proposals on how to get employers to take on people in poverty, or how to develop new jobs which they have a chance of getting. Social economy projects and organisations are often at the forefront of approaches promoting supportive pathways into work and creating new jobs for people furthest from the labour market in new community services. But these are still not adequately supported or resourced, to ensure that they can provide the quality training and sustainable quality employment. Although some welcome new measures are advanced to tackle in-work poverty, these are often limited to increasing access to professional education and training, rather than implementing and improving minimum wage levels and working conditions. Insufficient attention is given to support measures in the transitions between benefits and work – including access to essential services – childcare/health/transport. Little major progress has also been made on integration of migrants although there is marginally more mention of them. This is still tackled primarily as an educational/literacy issue, rather than integrated approaches looking at access – to work, income and services. Members highlight key problems with the income of asylum seekers or the insuperable barrier of lack of legal status.

- **Lack of adequate income threatens social cohesion**

The right to adequate income for a dignified life remains the forgotten ‘sibling’ of the Active Inclusion family, despite the support given by Member States to the proposal for the Active Inclusion Recommendation. Most Member States make no mention of actions in this field. 3 countries (4 including Norway) still have no minimum income scheme: Greece, Hungary and Italy, and little sign of remorse. Important progress has been made in 3 member states, but benefit levels still make little attempt to reflect real needs, or link to independent budget standards. The majority are below the official risk of poverty threshold. The impact of economic recession is making this much worse, currently combined with rising food, housing and energy prices which are squeezing fixed minimum incomes, even though prices should fall as a result of the recession. Members criticize the lack of a transparent method for fixing and revising adequate income levels, involving stakeholders as well as links to relative criteria – particularly the

poverty threshold. Moreover, the lack of a solid rights base to adequate income, is enabling Governments to instrumentalise benefits, “prodding” people into work, by threatening cuts in benefits. For many EAPN members, this is seen as a “*social crime*” and a betrayal of fundamental rights. “*How can you withdraw benefits from somebody who lives on 440 Euros a month,*” (EAPN FR). Such approaches lead to increased hardship, neither are they proven to be the best way to help people into quality jobs. They also fuel the increasing stigmatization of people in poverty, which is exacerbating tensions within deprived local communities.

- **More services but lack of integrated strategies and under-investment**

In some Member States, clear progress is being made in the extension of existing services or the provision of new ones, particularly with regard to strategies towards the treatment and prevention of homelessness. However, many members remark on the lack of integrated strategies towards service provision based on the preventative as well as assistance role of services in reducing poverty. Given the focus on getting people into work, there is a surprising lack of focus on increasing the provision of essential flanking services – childcare, education/training, housing and health. Although housing and prevention of homelessness is clearly an increased priority, this is too often matched by inadequate measures e.g. focus on support to buy, rather than social housing/ or low rent. FEANTSA also highlights that “*whilst most countries are developing or consolidating actions to tackle homelessness, including specific homeless strategies and measures on homelessness as part of wider policy frameworks*”, *more reliable data are needed to develop indicators to monitor trends and develop evidence-based policies as well as to forge better targets to effectively tackle homelessness*”. The withdrawal of investment from social housing and reluctance to regulate rents in the private sector is seen as a major threat to the implementation of the right to decent housing, despite the legal victories won in some countries. Overall, there is a continuing evidence of the lack of a strong rights base to basic services, as well as insufficient recognition of the need for pro-active measures to tackle discrimination. Inter-agency working, which is so crucial to the design and delivery of community services to reach people in poverty, is not mentioned. Where targets are set, adequate funding is often not made available to ensure coverage and access for all. As the economic crisis starts to bite, cuts in primary health care, social housing and education are already being made, in the rush to reduce public deficits.

- **Low priority for integration of migrants**

Although there is a minor increase in the mention of migrants, few new measures are proposed and little sign of multidimensional and integrated approaches. There is inadequate analysis of the social and economic reality faced by different groups of migrants especially in relation to residence status or who face multiple barriers (e.g. asylum seekers, undocumented migrants, migrant families and unaccompanied migrant minors.) Some members highlight that migration is increasingly seen as a “justice and home affairs” issue, rather than an issue for social and economic integration. The main focus is often on literacy and actions to promote language skills, with some measures to provide better advice for migrants or to tackle school performance and attendance. There are some examples of new Task Forces set up to look at integration. In general, there is no explicit rights-based focus, little reference to discrimination or need for active anti-discrimination measures, particularly in relation to access to work/ discrimination once in work and access to key services. No adequate response is raised to key challenges related to over-qualification and de-qualification, where migrants meet major difficulties in accessing employment relevant to their qualifications and are “channeled into lower status jobs”. The lack of comprehensive social impact assessment on key policy initiatives like work permits, residency rights etc. leaves most migrants with little defense.

- Lack of strategic approach to discrimination/equalities apart from work.**

Although there is some increased visibility on discrimination, with some important new strategies and measures, there is a general lack of overarching strategies to tackle discrimination. There also appears to be confusion in policy objectives, between Equal Opportunities, Diversity approaches and anti Discrimination approaches. The overwhelming policy focus is tackling discrimination in accessing the labour market for specific groups, with some isolated examples of tackling issues to do with access to health. In terms of impact on specific target groups – there is more recognition of issues of migrants and ethnic minorities, particularly Roma and Travelers, discrimination due to sexual orientation, religion or belief is generally absent. Although many reports contain specific sections on Gender, there is little specific follow up of the Gender Pact requirements. Where there is a focus it is mainly on the gender pay gap, but limited understanding of the structural causes of gender inequality.
- Mainstreaming - better coordination, but insufficient impact.**

The Guidance Note makes important recommendations on the need to ensure mainstreaming and closer articulation between the OMC and the revised Lisbon Strategy as well as other policy fields and to promote cross-cutting social impact assessment in all policy fields. Members note an increase in “statements” around improving interaction, but little evidence on impact on the content. In some countries broader institutional mechanisms involving higher level politicians are a small mark of progress. However, members mainly voice concerns about the objectives of such mainstreaming – where the objective is not to ensure poverty reduction across all policy fields, it is instead too easy for the “economic priorities” to be “mainstreamed” into the social. There is also little progress on impact assessment. Where examples exist, the guidelines are generally valued, but the lack of transparency of the process, and involvement of grass-roots stakeholders at all stages, undermines their usefulness.
- Unmet potential for mainstreaming social inclusion across other SPSI pillars**

As said earlier this report mainly focuses on the Inclusion part of the Strategic Reports and less on the Pensions and Health and Long Term Care part of the Reports. Few EAPN members have the resources to engage in the other processes or to assess the reports. This reflects that the 3 pillars continue in reality not to be “streamlined” at national level and are dealt with by different departments and ministers, following a separate process. In general there is much weaker stakeholder involvement in the other pillars, and normally anti-poverty NGO’s are not invited to participate. However, EAPN is very concerned about the content of these strategies and how far social inclusion concerns are streamlined. They would welcome attempts by national governments to promote more integrated stakeholder debate on key areas. Where EAPN members have managed to engage it has brought clear benefits. Key areas of concern continue to be sustainable financing to ensure that pension systems guarantee access and adequate levels, tackling discrimination in coverage, particularly for women. Increasing inequalities in access to affordable health and dental services, and the broader theme – who will care for people experiencing poverty? – i.e. the overarching concern about how “care” services will be supported was highlighted from the Health section of the Reports.
- Progress in participation, but needs consolidation**

EAPN is very pleased to see that there are some important signs of progress on participation and governance processes in a minority of member states, particularly new member states. This means an

increased involvement of stakeholders in consultation meetings, on-going dialogue, invitation to comment on drafts, and in some cases to engage in follow up discussions and more of an on-going dialogue (8 MS). A number of Member States appear to have invested more strongly in the process and its outcomes and have embedded an **institutionalized regular stakeholder dialogue**, comparable, or in some cases better, to those with social partners. However, there are worrying signs of both stagnation i.e. countries that have just kept the same process despite recognition of previous failings, whilst some have actually gone backwards. In Ireland's case this is particularly disturbing as in 2007 Ireland's participation process was the good practice focus of the OMC's Peer Review.

- **Need to capitalize and mainstream good examples**

There are some strong models of good practice emerging in participation/governance. More needs to be done to ensure effective mutual learning and application.

- EAPN members and other NGOs have been actively engaged and produced shadow reports (CZ, SE, POL, IE, UK, MA, FR, HU)
- The EU should support some New Member States to further build on progress made (CZ, POL)
- More validation and profiling/exchange should be given to the well-functioning embedded structured of on-going dialogue with all stakeholders on NAP and National strategies (BE, UK, ES, NOR, FR)
- Good examples of bottom-up regional and local action planning processes on social inclusion involving all key actors and feeding into NAP. (ES, UK, BE, SE.)
- There is a growing involvement of People in Poverty at all stages, but more work and exchange/learning needs to be done on methodology (MA, BE, UK, NOR).
- Some positive models of raising visibility – e.g. FR and BE: Good communication, press conference and televised Parliamentary debate on the NAP.

3. EAPN Recommendations

1. A social response to the crisis and post 2010 agenda

- Develop an **Emergency Package on Poverty which would establish a 3rd Pillar** prioritizing social justice and investing in people in EU proposals for an **EU Recovery Package** ([See EAPN Response](#))⁶
- Ensure that **discussions on post Lisbon 2010** openly challenge the paradigm that the market knows best, prioritizing a social progress pact to establish a social and sustainable model based on four equal pillars: economic, social, environment and employment.
- Link the Economic Recovery package to the **Active Inclusion Recommendation** – ensuring that commitments to ensure adequate income and access to quality services and decent work are delivered through the OMC.
- Ensure the **Social OMC plays a key role** in the post Lisbon vision, that the EU Year against Poverty and Social Exclusion in 2010 marks a new commitment to achieve eradication of poverty by 2020

⁶ Key elements: counter cyclical policy by investing in people, keeping prices affordable, investing in decent jobs, and ensuring access for those most in need, establishing specific targets to prevent and reduce poverty, redirect EU funds to poverty solutions, tackle indebtedness and support safe banking, promote good governance and political visibility.

2. Specific Proposals on the OMC

- Implement the **proposals on Reinforcing the OMC**, particularly revitalizing governance and the NAP process, commitment to policy impact through targets and recommendations and development of more effective mutual learning, social innovation and financing tools.
- **Agree specific EU targets** now on reducing risk of poverty and social exclusion by 2010 and eradication by 2020⁷.
- Agree a **formal social contract/pact** between each Member State and the EU to deliver national commitments on a revitalized **EU Strategy to Fight Poverty and Social Exclusion**, based on the OMC Common Objectives, including **national targets**.
- Ensure **visible effective monitoring and follow up** through annual scoreboard mechanisms and Commission Recommendations.
- Ensure **delivery of integrated approach to Active Inclusion, within an overarching strategy to fight poverty and social exclusion through the OMC**, by establishing a high profile **road map** for actions at EU and national level.
- **Establish specific mechanisms for developing independent standards** on adequacy levels of income, through a participative methodology and campaign to change perceptions of poverty.
- **Recognize consensus for EU action on ending street homelessness** and support a thematic focus on the fight against homelessness and for affordable housing.
- **Implement the Childcare Report recommendations on child poverty** – giving priority to ensuring adequacy of family income, delivery on Barcelona Targets on affordable quality childcare, move forward on measurement of child-wellbeing and promotion of children's rights and parenting support.
- Develop **specific guidelines on social impact assessment using participative mechanisms** and dedicated Commission Staff Resources to coordinate action and engagement with stakeholders.
- Promote **better coordination and articulation** with the Lisbon NRP process, but also within the streamlined OMC: between the different pillars. This should focus on ensuring that the objectives of social inclusion and eradication of poverty are mainstreamed effectively, better mechanisms, including joint meetings and planning, and involvement of key stakeholders including users/ and people experiencing poverty.
- Finance **grass-roots as well as government initiatives on social innovation and social experimentation**, and ensure joined-up partnership approaches to delivering more effective evaluation and mainstreaming through PROGRESS, ESF and a new **Poverty Programme**.
- **Set up a specific Community of Practice on Active Inclusion**, as well as transnational exchange projects.

3. Governance and Participation

- Build on the **growing consensus of the added value of on-going structured dialogue** with civil society and people experiencing poverty to implement anti-poverty strategies.
- Emphasize the importance of **funding participation with support to NGOs** who work with people most affected – in both the NAP Inclusion and the other pillars of the OMC, and the **systematic**

⁷ See [EAPN Response to Reinforcing the OMC](#).

involvement of stakeholders at all stages of the policy cycle, the importance of feedback on impact, the link to **national policy decision-making cycles** and institutions.

- Carry out a **detailed qualitative and quantitative evaluation** of the progress made on governance and participation in the NSRSPSI and the impact of this participation on policy, involving civil society and people in poverty.
- **Promote exchange on quality participation processes and on methodologies to promote systematic participation** with the development of benchmarking and specific guidelines which can be used as a basis of knowledge transfer with the other pillars of the OMC and the Lisbon Strategy etc.
- Promote detailed exchange with member states and stakeholders about how to **better synchronize and articulate EU, national, regional and local action planning process** on social inclusion to ensure effective participative policy design and delivery..
- **Deepen mutual learning** in agreed EU priority policy areas and develop consensual European Policy frameworks and more strategic approaches which impact on policy.
- **Broaden civil society stakeholder involvement** in mutual learning at national and EU level in both the NAP Inclusion and the other pillars, including the development of broader thematic review model.

4. Conclusions

The OMC faces a cross-road. Although some progress has been made on specific policy areas, it is not enough to justify such a large and expensive mechanism of coordination. The OMC is not doing enough. There are clear signs of apathy from some Member States and lack of willingness to make the most of current mechanisms to drive forward dynamic anti-poverty strategies which have a chance of delivering on the OMC's objectives. It is no surprise that some of the best progress has been made, and a more transparent commitment to move forward on EU priorities, where better governance processes are really working. The EU needs to address this democratic deficit and use the strength and energy of grass-roots stakeholders who are directly involved in the delivery and receipt of services, to develop dynamic action plans and on-going structured dialogue including people in poverty, at local, regional and national level which link to the NAP inclusion within the Social OMC. The crucial question is how to ensure a realistic and operational link with the National Strategic Reports, including the NAP Inclusion and national policy making processes. It is also clear that the OMC must get tougher – there is not enough visible progress, on the goal of eradicating poverty as well as on agreed priority areas – like Child Poverty, or Active Inclusion. The Commission and Social Ministries from Member States must take responsibility for providing vital leadership to drive forward this agenda, and to make the OMC work. They must make a public commitment to set clear EU and national targets on poverty, equivalent to the revised Lisbon Targets on employment, childcare, and even education and training (also subject to subsidiarity constraints). This would go a long way to reassuring people that the EU takes seriously its commitment to eradicate poverty and social exclusion and that Member States are committed to use the OMC as a key instrument to make this happen.

B) EAPN Assessment of the National Reports⁸

1. Common Overview: Key Trends and Challenges

The National Strategic Reports' common overview is dedicated to an analysis of the social situation. This section is intended to highlight trends and progress made in addressing key challenges. However, many EAPN members highlight the **poor quality of the analysis and the failure to depict clearly and fairly the real poverty and social exclusion situation (BU). There is also a failure to focus on the multidimensional challenges of poverty (Poland).** These sections are often seen as **too descriptive and lacking an in-depth analysis** of poverty trends and progress made (Austria) as well as **specific information or indicators on key new drivers** e.g. the financial and economic crisis, rising prices and the impact on income (Malta, Austria).

No Significant Progress on Poverty

Most EAPN members highlight their concern about the lack of visible progress on at-risk of poverty levels and other poverty indicators. Difficulties arise as many reports do not refer to the overarching objectives of the OMC (UK) or the specific goals of eradication of poverty (AU). It is also clear that comparable evidence of trends in income inequality and poverty is difficult to come by, due to the change in data sources at EU level. However as confirmed in the Commission Staff Working Document⁹ *“the overall poverty rate has not improved at EU level, and has even increased in Finland and Sweden, in Hungary and to a certain extent in Germany and Italy with signs of a decrease only apparent in Ireland, Netherlands, Portugal and Poland”*.

EAPN members' responses confirm to a greater extent these findings:

- 1) **No significant progress** on at risk of poverty levels: This is highlighted by Belgium, Czech Republic, Norway, Poland, Austria, Members emphasize that the key trends section in the report often appears a repeat of the 2006-8 Report. (BE)

“The NAP confirms that 15% of the population is at risk of poverty. This is the same figure as the previous years (2004-6). This means we have made no progress, which is a bad augur for the future and the objective to make a decisive impact on poverty by 2010 (EAPN BE)

- 2) **Some small improvements** in poverty levels: (France, Ireland, UK, Denmark). However members highlight that often the improvements in the overall risk of poverty levels have been slow, and may have come at **the cost of poverty levels for specific vulnerable groups. In Romania there has been a small decrease in inequality levels.**

⁸ Please note that a supporting document with additional country specific information on which the analysis below is drawn is available on the EAPN website (www.eapn.eu)

⁹ “Monitoring progress towards the objective of the European Strategy for Social Protection and Social Inclusion” Commission Staff Working Document. SEC (2008). 6.10.2008

In Ireland, consistent and at-risk of poverty levels have reduced slowly (At risk of poverty from 19.7% in 2003 to 17% in 2006 and consistent poverty from 8.8% - 6.9%) and certain vulnerable groups such as children, lone parents, people with disabilities, and those who are unemployed are at a greater risk of poverty, as well as non-Irish nationals. (Increase in inconsistent poverty levels from 2005-6 amongst unemployed have grown from: 21.6%-22.8%, ill-disabled (17.4%-20%), 2 adults with 1-3 children (5.3% - 6.2%), children 1-14 years (10.2% -11.1%) and most particularly for lone-parent families (27.2% - 32.5%).

3) Poverty levels are getting worse: (HU, SE, GE)

In some cases EAPN members highlight **increasing poverty levels** and **growing inequalities** (SE). Relative poverty rates also often hide a much worse **reality of severe or extreme poverty**.

In Hungary, 16% of the population is cited as being below the poverty line. This is blamed primarily on the slowdown in economic development, with employment stagnating at a low level (57%), and exceptionally high number of inactive adults, significant territorial differences and low mobility. However, EAPN highlights that in fact 30% of the population live below subsistence level (calculated by the KSH – National Statistic Office, 25% of children live in poverty, whilst the Roma population is stated as having 50% below the poverty line (EAPN HU)

Progress on growth and jobs has not meant less poverty

Some member states highlighted improvements in economic growth and progress on unemployment (prior to the current downturn) (GE, DK, SE, UK). However, EAPN members highlight this has **not necessarily ensured a reduction in poverty**, by ensuring that the benefits of growth are directed to the most vulnerable through effective redistribution mechanisms. In some cases, growth appears to be fuelling **increasing inequalities** or failing to ensure that real wages and income keep pace with rising prices.

In Sweden, growth slowed in 2007 but employment increased by 2.4% in 2007, especially for young people (rising by 8.8%) and migrants increasing by 6.2%, but relative poverty is also increasing, and there are increasing disparities of income and wealth.

In UK, high levels of employment and low levels of unemployment and increased employment of disadvantaged groups are seen as having been produced by a policy mix of labour market flexibility, minimum standards and active welfare to work programmes, however inequality which fell slightly in 2000-5 from a very high level is now rising again.

*In Germany, the economy grew from 2005-6 up to 2.9%, and the National Report highlights the importance of reforms in the labour market which has led to more jobs and the reduction of unemployment, nearly meeting the Lisbon objectives of an employment rate of 70%. But the noted rise in wage levels by 1.5% has not prevented the rise in at risk of poverty levels. **“The economy is growing but people have less money. After a long stagnation pensioners finally won 1.1% more in 2008”***

In Spain, most persistent social problems relate to the current economic model based on regressive income distribution. The gap between the rich and poor has increased in Spain, despite two decades of growth, as shown by the OECD Report in 2008. There are weak or vulnerable sectors whose needs are still not covered by the welfare state implemented in the 1980's”

In Bulgaria, the National Report highlights “sustainable economic growth, increase in employment, high level of investments, convergence in incomes and prices and improvement of social and territorial cohesion, but recognizes that poverty levels of people outside the labour market has risen”.

Failure to highlight financial and economic crisis.

Most member states fail to flag up pending trends or implications of the current financial economic crisis (AU, MA, UK, DK, HU, ES). Others do not necessarily highlight the real impact for people experiencing poverty (IE, DK) in terms of **reduced purchasing power, jobs and reduced services**.

EAPN UK, There is no reference to the changing economic climate although this NAP was written over the summer of 2008, when the ‘credit crunch’ and the house prices falls were already underway and unemployment and business failures were rising”.

EAPN IE, “The section highlights the negative economic situation but does not sufficiently highlight the real and potential impact on people experiencing poverty e.g. the cost of food, fuel and other items like housing. This will directly erode income and increase the risk of poverty for those on social welfare payments and low wages. There have already been cuts to vital health, education and other services and the new budget will be a difficult one”.

EAPN ES, “In the summer of 2008 statistics already showed the impact of the credit crunch, the first slope of growing recession, and the aftermath of social consequences. This should have been acknowledged in the NAP”.

Other Missing Trends and Challenges

Other key areas which are highlighted as missing by members in Member States’ Common Overview include:

- Insufficient analysis of **poverty trends** and challenges, particularly as it affects specific groups or in relation to depth or intensity of poverty (AU, POL, BU, ES, RU)
- Failure to discuss the **causes of poverty and inequalities** (BU, PT)
- The vision of **social vulnerability** as a multidimensional process (ES)
- Rising **inequality, lower salaries and lower incomes for the poor, rising income for the rich** (between 2002 and 2005, employees watched their salaries fall by 4.8% and 1.3 million people had an income so low that they had to combine it with social benefits. Meanwhile the only group that watched their net equivalent income rise are the 10% of the richest persons (GE)¹⁰
- Insufficient recognition of the failure to **significantly close the education gap** or to increase expenditure – with education level remaining dependent on social origin (GE)
- Insufficient assessment on trends in who is **accessing benefits** and the impact on income (HU, UK)
- Limited information or reflection on the **impact of rising food, energy, water and housing prices** (MA, HU) and the lag behind of incomes, or reference to the connection with minimum income and inflation (BU)
- Insufficient attention to the impact of **trends in public spending**, ie the role it plays in taking people out of poverty, and the impact of regressive trends or cuts.
- Inadequate assessment of **trends in the access to services** (in terms of coverage, affordability, physical access) or in quality.

¹⁰ References drawn from the 2nd and 3rd German Poverty and Wealth Reports.

- Missing focus on **inequality, single adult poverty, housing need, older people, poverty pay, minimum income guarantees and the government contribution to raising public awareness and understanding poverty and policies** to combat it (UK).

2. Policy Priorities and Themes

There are strong common tendencies related to the policy priorities chosen by Member States. In general the approach to priorities seems to closely reflect the approach suggested in the Commission's latest Guidance Note. However, the pressure to focus on limited priorities is not always seen as a positive development by EAPN networks, nor the decision to simply repeat the same priorities as previous rounds. In many cases, the focus on priorities, not only misses important and sometimes urgent other priorities, but more importantly undermines a more strategic and multidimensional approach to eradicating poverty and social exclusion. This would involve setting out an overarching strategy on the general eradication of poverty and social exclusion, before highlighting short and medium term priorities. It also often underlines the suspicion that the National Strategic Reports are reports produced primarily for the benefit of the Commission and the EU process, rather than as genuine strategic plans. The choice of themes is not seen as always so obvious, with important missing thematic areas, which have been overlooked in the effort to maybe appear to follow the Commission's approach.

The influence of the EU priorities is strongly evident, as well as the continuity in the choice of themes. The majority reflecting the policy priorities highlighted in the 2007 Joint Report (Access to Employment, Child Poverty and to a lesser extent Housing and Homelessness). Equally the majority, continue existing priorities, which may reflect more the pressure to reduce work.

- **Majority follow EU priorities.**

Older and more northern Member States appear to more happily follow the requirement to establish a **limited list of priorities** (e.g. BE, FR, GE, UK, SE, POL,ES). However, this is not necessarily seen as positive by EAPN members e.g. in Belgium, a negative comparison is made to the narrow list of 3 priorities produced for the NAP, compared to the broader more integrated and strategic approach of the Federal (Flemish) Action Plan for the Fight against Poverty.

"The NAP focuses only on 3 priorities: Activation and Diversity, Housing and the fight against child poverty, whilst the Flemish Plan, which involved the anti-poverty network as social partners - focuses on 6 themes: an adequate income for a dignified life, guaranteeing a right to health, employment as a vehicle for social integration and well-being, guaranteed access to energy, access to services for all, right to housing"(EAPN BE)

- **Broader approaches in some Member States**

Some, particularly newer Member States have produced a broader list, which in some cases reflects the influence of stakeholder involvement which insists on an integrated approach.

CZ: Highlights an extensive list focused on the objective of the fight against social exclusion, promoting labour market integration, children and youth, prevention of housing loss, reduction of deprived areas,

better conditions and services for families with special needs, building effective strategic alliances, focus on social inclusion mainstreaming.

BU: The main overarching priorities are the same as in the previous NAP but there is a specific focus on certain targeted groups and key challenges – reduction of intergenerational poverty especially child poverty, active inclusion, equal opportunities for more vulnerable groups – including people with disabilities, Roma, people dependent on social assistance, unemployed with low qualification and non active or discouraged people, and better management of social policy.

- **Continuity with previous priorities**

Many reports demonstrate continuity with the previous NAP (2006-8) BU, GE, CZ, IE, NOR, MA, RU). This is seen in some cases as a positive development, indicating a determination to establish long term objectives and to achieve impact (MA, CZ, IE). “*We welcome the continuity approach, building on previous reports. The report started by highlighting the achievements and the challenges identified in the 2007 report*” (MA). In other cases it is seen as a lack of seriousness or commitment to the NAP process, highlighting the lack of strategic input: “*They are the same as always, there have been no significant changes in the focus of the NAPs in 6 years. The main focus is always activation*” (NO)

- **Insufficient justification**

Where priorities have changed, members note that this is not always justified sufficiently and can be seen to be undermining long term goals to eradicate poverty

” There are 4 objectives/priorities - increasing the possibility of social inclusion for the elderly, reducing exclusion amongst young people, reducing absenteeism from work due to ill-health, and continuing to strengthen groups in particular vulnerable situations. These are important issues but not key priorities, except for number 4 – only this goal builds on previous priorities”. (EAPN SE)

- **Relatively narrow choice of themes**

The choice of key themes closely reflects the EU priorities, with the major focus on Activation and other priorities related to supporting access to the labour market and child poverty. In general there is no explicit reference to the integrated Active Inclusion concept (see later section), although individual elements of the pillars are picked up in the priorities of different member states. In the later chapter we analyse the policies and measures proposed related to these key thematic areas (child poverty, active inclusion and social integration of migrants).

Activation and Access to the labour market – BE, BU, CZ, GER, NOR, PL, IE, UK, AU, RU

Active Inclusion – BU, MA, ES

Health in relation to access to employment – SE

Quality of Health services and employment conditions - DK

Child Poverty – BE, BU, CZ, GE, IE, MA, UK, AU, PT

Housing – BE, HU

Education and Training – IE, GE, PL, PT

Integration of Migrants (mainly in relation to the labour market) – IE, GE, DK

Ethnic Minorities – BU, (HU – Roma/Housing), RU (living conditions of Roma)

Elderly – BU, FR, SE, DK, ES

Diversity and Equal Opportunities – MA, BE

Access to services – BU, IE, UK,
 Strengthen groups in vulnerable situations – SE
 Governance – GE
 Financial Exclusion – FR
 Young people – SE
 Women’s participation in the labour market - RU
 Tackling Discrimination – UK
 Minimum Income – AU
 Integrated measures in other fields – AU
 Enabling access for all, to resources, rights and services - RU

- **Important priorities, particularly the inclusion of new risk groups**

Most EAPN members appear to agree with the priorities chosen (IE, CZ, HU). Some highlight the importance of the inclusion of important **new risk groups** in the priority themes, which reflect the recognition of important new and emerging challenges.

“Older people are recognized for the first time as people who are at risk of financial poverty, and we welcome the explicit mention of older worker, isolation and old age as key factors of the high level of poverty for this group (EAPN FR)

- **But inadequate analysis of progress**

However, few member states appear to give **sufficient detail or analysis on progress** made on existing priorities. This could raise questions about how far the focus on thematic priorities has been an aid to more effective implementation.

“They are the same priorities as last time, but since there was no significant progress we agreed it was important to put them again” (EAPN CZ)
“The plan hardly refers to the previous plan and with a very few exceptions there is very little report on whether progress is made – and actually there would not be very much to report anyway!” (EAPN AU)
“The NAP 2008 highlights progress on all key priorities – child poverty, labour market integration, access to quality services and tackling discrimination, in terms of targets, structures, funding and projects, but very briefly, without context, evaluation and integration into an overarching narrative’ (EAPN UK)

Key missing themes and groups:

A more serious preoccupation is the lack of clear overarching frameworks and important missing themes which EAPN members have identified:

- **The lack of a clear overarching priority to eradicate poverty and social exclusion**

Priorities can be a useful focus if they are set within a clear overarching strategy. Too often this appears to be missing and priorities – a disconnected list of themes without clear justification (AU, DK, UK, HU, SE).

EAPN DK: “There is no priority in the NAP of poor and socially excluded in general, concepts such as poor, working poor, or minimum income are not mentioned. The NAP also does not use the EU indicator

on poverty- 60% on median income but the OECD level of 50%. Using the same terms as other member states would make comparisons and political debates on standards easier”

EAPN HU: “The major deficiency is that, as is the case in other EU member states, it lacks an overall, independent and strategic concept for fighting poverty”

EAPN AU: “The priorities are OK, although the 4th one seems quite a random collection of various measures lacking a strategic approach and priorities with at least explanations why certain risk groups are covered and others not, this is mostly due to the reporting character of the plan”

EAPN UK: “The limits are clearly set by a marketised conceptual framework which focuses on supply side employment, welfare reform and labour market insertion – key missing priorities are: rights, redistribution, job creation, adequate minimum income, impact of devolution on mainstreaming the fight against poverty, strategic approaches to the implementation of anti-poverty agenda, as opposed to a more narrowly focused Cities strategy or Public Services Agreement target”

However EAPN Bulgaria highlights important progress in the final draft of the NAP.

“We consider this NAP a step forward in comparison with previous NAPs:

- Strategic Vision – the document recognizes the need for the elaboration and implementation of an integrated long term (10-12 years) strategy against poverty and social exclusion
- EU dimension – including better explained EU concepts – eg Active Inclusion.
- Anti-poverty and pro-inclusion dimension – the first time that these are placed in the centre of the NAP”

- **Tackling rising income inequalities** (UK, AU, SE, DE)

Although the Guidance note makes reference to the importance of charting inequalities, as does the Commission evaluation of the progress on EU indicators, very few Member States make a strong enough link between the lack of progress on poverty and rising income inequalities. Even countries which have wealth and poverty reports, fail to highlight both trends and the need for urgent action, as a key priority, despite the strong evidence that more equal societies prevent poverty.

- **The real and potential impact of the financial and economic crisis** (MA,IE,UK)

Few Member States remark on the impact of the “credit crunch” and the impending fear of recession, or how the likely fall out will affect people experiencing poverty. EAPN Members highlight growing concerns related to the likely impact on jobs and access to services as well as the rising cost of food, fuel and other items in relation to reduced income/wages in real terms (MA, IE, UK). Immediate consequences are already being felt in the impact on **indebted families** due to the failure of credible credit systems.

“Families who are victims of usury and families who will become poor because of higher energy and other prices” (EAPN MA)

“The main progress has been with the decrease in unemployment rate, however this has been the joint effect of emigration, restriction on the opportunities for registering unemployment and active labour market measures in the context of economic growth. Now with rising unemployment (only partially explained by global financial crisis) and economic slow down, it is doubtful if the priorities are adequate” (EAPN BU).

- **A right’s based approach to establishing adequate Minimum Income** (NO, BE, PO, UK)

Although this should be part of the Active Inclusion approach discussed later, several members emphasize the importance of giving separate priority to the establishment of effective adequate income levels, particularly in this time of economic crisis.

- **Analysing housing need and increasing housing supply** (BE, UK, PL) and the **prevention of homelessness** (DE, UK, FR, FEANTSA)
Homelessness and housing is given a stronger priority in the current NSR, which EAPN welcomes. However several members highlight the need to give more specific priority to the analysis of housing need and increasing housing supply, as well as preventing homelessness.

“There is a reference to a review of housing benefits but no focus on house building or social housing to increase supply, despite a 4 million person waiting list and the lowest housing starts since 1945” (EAPN UK)

Other missing priorities:

- **Tackling health inequalities and access to health** (PL)
- **Employment as a tool for social integration** and well-being rather than just an instrument for growth (BE, PT)
- **Tackling poverty pay and working poverty** (BU, UK)
- **Investment in social infrastructure, challenging impending cuts to public services** (IE)

Missing Groups

Important priorities on key target groups are also highlighted as missing, including:

- **Migrants and Ethnic Minorities** – including undocumented migrants, asylum seekers (UK) and unaccompanied minors (MA). In Ireland, although these groups are named as a priority the measures proposed are not seen to be sufficient.
- The need for a broader focus on **transgenerational poverty** rather than only **child poverty** and the key role of education and training (AU, PT)
- **Single adults in poverty** (UK), who are the forgotten group, with the current focus on child poverty and families.
- **Child Poverty as an overarching theme** (ES, RU)

3. Implementation: targets, indicators and adequate resources

EAPN highlighted the importance of strengthening the effective implementation of the NAP Inclusion as part of the Social OMC, through establishing quantitative targets, specific indicators and making clear what budget will be allocated, including Structural Funds. This was also reflected in the Commission's proposals. However, if this is to lead to stronger implementation, it needs to move beyond describing what is happening to establishing ambitious goals, clarifying how this will be achieved and with what funding, and indicating the indicators that will be employed to monitor success. EAPN fully supports the Commission's proposals on targets and strongly stresses the need to have targets as a central instrument to developing a more ambitious approach to tackling poverty.

More and Better Targets

There is some evidence of an increase in specific targets (BU, BE, GE, IE, MA, UK, DK, SE, RU). Although many member states still prefer to use more general objectives (CZ, AU). Some **positive examples** are cited:

Ireland: highlights the specific target to **reduce consistent poverty**

Malta, EAPN highlights the improvement from the previous NAP and NSRSPSI: “The current NSRSPSI sets a number of adequate and realistic targets for the two year time frame, to enable better quantification and appraisal of progress” e.g. Reducing the child poverty risk to below 19.0% by 2009, increasing the percentage of 20-24 year olds with upper secondary qualification above 70% by 2013, raising the employment rates of key groups, including older workers to 35% by 2010, increasing the provision of formal childcare for children under 3 to 13% by 2010, increasing households connected to broadband to 80% by 2010 and ICT literacy to 75% by 2010.” (MA)

UK: “New PSA Target for socially excluded adults and target for older people’s inclusion, one of the 5 indicators of which is the percentage of pensioners on low incomes”

France: “The insistence on indicators, and a road map and specific targets is welcomed by EAPN France, defining what are seen as the essential criteria to measure progress on poverty and setting out the parameters for measuring progress”

Germany: Support the inclusion of targets on raising the employment rate, childcare, social security level.

Romania: The government has developed a pilot research and a series of 100 indicators to assess progress in the area of social inclusion.

Main concerns

- In some cases the targets are seen as unambitious (BU), even **assuming a slight increase** in poverty levels.
- Targets are often seen as **too general**, and in some cases point to **existing levels** as opposed to targets for the future.
- There is often no clear indication of **how the targets are to be achieved, where the responsibility will lie or the corresponding budget.** (MA, BE, IE, PT)
- **The lack of transparency around why the targets have been chosen**, can also be a problem, as groups worry about the underlying assumptions behind the proposals, and how this will affect delivery and impact on poverty.

“Although the target on consistent poverty is important, it is not clear how this will be reduced, particularly amongst groups where poverty is particularly high such as lone parent families, people who are ill or disabled. The targets focused on promoting the employment and participation of groups distant from the labour market include the aim of reducing by 20% the numbers of those whose total income is derived from long-term social welfare payments”. Although these targets may not be negative in themselves, it could have worrying implications unless it is made clear that this target must only be achieved through positive and supportive measures which involve all three elements of active inclusion – income, services, and quality employment.” (EAPN IE)

- **Ensuring targets are an instrument of an integrated strategy**
The question is not just whether there are **sufficient** targets, but if they are the **right ones** and whether they **contribute to an integrated strategy** against poverty and social exclusion or run the danger of undermining it.

“Eradicating child poverty is an important target that drives policy priorities. But there is no general anti-poverty target.....There is a potential problem of specific targets driving the wrong policy priorities and producing paper gains only” (EAPN UK)

Broader and more effective Indicators

Members highlight improvements in the extent, type and use of indicators. E.g.: EAPN France highlights “the good use of indicators and transparent monitoring of the objectives and results compared to 2006”. However, concerns are raised about:

- 1) The need to extend and deepen indicators and data for specific groups and to better monitor impact.
- 2) How far the indicators will be used to really drive implementation and
- 3) How stakeholders will be involved in the monitoring process.

- 1) *Ireland* points out the need to gather **data on specific groups** such as Travellers, in terms of poverty levels including child poverty. Currently no data exists and measures are not put in place to address poverty for this specific group. They also highlight the important initiative of the Department of Social and Family Affairs which is looking at developing indicators for **monitoring outcomes** for its model of “**active case management**” support for unemployed people.
- 2) *France* highlights missing data (and targets) on **energy**, despite priority given to the theme of rising prices
- 3) *Austria* highlights that although more detailed indicators were developed in the framework of a special research project that included stakeholder involvement (including EAPN AU), these have **not been linked to specific targets** and therefore to drive implementation. “one has to ask if there is much point in getting more and more information when no concrete action follows.”
- 4) *Bulgaria* notes that the Laeken indicators are not sufficient and Bulgaria needs third level indicators, nationally adapted and adequate to monitor short and long term development.
- 5) *France* underlines the importance of the commitment to set up a special inter-ministerial group to regularly **evaluate progress** based on the indicators. However, this could have benefited from involving more **grass-roots actors who work with people experiencing poverty and decentralized institutions**. “If the NAP is to become a strategic tool it needs to create better articulation with the decentralized actors who are those who receive and are responsible for the delivery of proximity services - regional, local level”.

Insufficient detail on Budgeting and Financing

However, less progress has been made in specifying how the objectives and targets are to be delivered in terms of financial mechanisms and detailed budgets. Generally the **budgets reflect past expenditure** rather than the financing of future priorities and measures. This only further underlines the continuing **weakness of the NAP as a report rather than a strategic plan**. When budgets are mentioned they often **lack detail**.

However, despite the clear references to the NAPs in the European Social Fund Regulation, and more generally the potential of Structural Funds to reduce poverty and social inequalities, there is little evidence that this potential has been strengthened compared to the previous round. Where Structural Funds are mentioned the focus is generally on traditional employment measures, with no specific effort to develop approaches meeting the needs of those further away from the labour market.

This could highlight the lack of awareness of how structural funds could be better used for social inclusion, in particular: through “positive” activation measures, measures allowing wider integration and empowerment of excluded groups, capacity building for social NGOs, access to quality services (in particular for convergence area), inclusive entrepreneurship approaches and infrastructures linked to social inclusion. It also reveals a worrying fragmentation among public authorities themselves (in particular the isolation of ESF authorities) and the failure to build better interaction between priority setting and practical implementation.

*In Belgium, there is **no budget** in the NAP, the federal government decided the budget for 2009 on the 19 October, but it is not detailed and is still subject to discussion.*

*In Ireland, the resources identified are those **already outlined** in the Irish National Development Plan 2007-13. The only mention of **Structural Funds** is in relation to ESF and a measure to address the participation in the economy by people with disabilities.*

*In Austria, budgets are mentioned only in relation to measures that were introduced in the past. There are **few future plans**, and measures that are mentioned are very **vague** and not linked to a clear budget.*

***Structural Funds** are mentioned with regard to **labour market integration** only, particularly with regards to the introduction of measures for social assistance receivers and long-term unemployed, but no clear plans or targets. ESF will also be used in “**territorial employment pacts**”, and to introduce measures for special risk groups, such as **elderly, youth** and active case-management, but without plans or targets.*

In Bulgaria, “ Targets are set for Structural Funds, but as there is no social impact assessment of the use of Structural Funds, they are not likely to result in a decrease of poverty and social exclusion”

Spain highlights that the Structural Funds are being developed on a regional basis, with multi-operating programmes with a thematic approach. One of these programmes is the fight against discrimination.

4. Delivery on key themes: Child Poverty, Active Inclusion and Social Integration of Migrants

In this section we highlight EAPN key findings in relation to 3 key themes which were identified as key priorities for EAPN, and reflected in the Joint Report 2007.

4.1 Child Poverty

4.2 Active Inclusion

4.3 Social Integration of Migrants

All themes were highlighted as overarching EU priorities in the 2007 Joint Report. In the first two areas there is already a certain EU consensus on the best policy approaches. Child Poverty was the specific topic of the “light or thematic year” for the OMC in 2007 and detailed recommendations were made for policy, measures and indicators¹¹. Active Inclusion is the subject of a current Commission Recommendation which will be discussed in the December EPSCO Council and has been the subject of reports, a special SPC working group and two extensive consultations. Social Integration of Migrants is a specific area that will be developed in the future. All of these themes have been highlighted by EAPN members, in the General Assembly and in the People Experiencing Poverty meetings as key concerns. We highlight in this section:

¹¹ See www.europa.eu

- What progress has been made in the development and implementation of more integrated policy solutions (including good practices)?
- What are the policy gaps?

4.1 Child Poverty: Some improved approaches but weak implementation

Some limited progress on Child Poverty

There appear to be some signs of progress on the commitment to tackle child poverty and improving approaches. This undoubtedly reflects the influence of the OMC and the thematic year focus, encouraging member states to deepen their knowledge, rethink their approaches and to plan new strategies. In particular this is noticed in an increase in general targets and specific objectives focused on child poverty. In some Member States there is a clear development of new or more integrated strategies supporting families out of poverty. But in general, effective universal, multidimensional strategies to tackle child and family poverty are still lacking. Doubts are also raised about how effectively they will be implemented with little detail on budgets, measures and follow up. This is disappointing following the thematic year focus of all member states in the social OMC in 2007. It clearly does not deliver on the promises made.

Positive Examples

- **More and better targets:**

More countries have introduced targets but also improved and deepened the targets set. Eg Belgium highlights the target of reducing the child poverty ¹² from 15% in 2008 to 12% by 2010, as well as reducing the proportion of children (0-17) living in unemployed households (from 10% in 2008 – to 7% in 2010) and has also set new targets for lifelong learning and school drop-out.

- **New specific Child Poverty Strategies**

The exchanges at EU level, seem to clearly have helped some member states, particularly newer member states, develop new strategies on child poverty. Some of these are now lodged more clearly in the reduction of intergenerational transmission of poverty (BU). In others, where a strategy already existed, it has helped to get governments to adapt and improve existing strategies, drawing on other member states examples and successes.

Hungary: In the spring of 2007, Parliament passed the “Let children have better” National Strategy, which is the first independent strategy in Hungary on a specific area on poverty.

Austria: The focus of the first thematic chapter of the NAP focuses specifically on the development of opportunities for children and youth, referring back to the target for reducing child poverty to 5% by 2010.

Ireland: No new initiatives are mentioned, but details are given of the National Childcare Investment Programme and a new Community Childcare Support Scheme – set up in July 2008, for managing delivery of the NCIP. This will target supports to those on social welfare and lower incomes through a new tiered system.

UK: The UK NAP acknowledged “more needs to be done to meet the UK’s challenging ambitions to eradicate Child Poverty by 2015” (UK NAP 2008 page 24). The UK strategy prioritizes getting parents in to work, but also focuses on financial and material support, safe and sustainable communities and every child matters, focusing on early school and closing attainment gaps, families with disabled children and

¹² The number of children living within households whose income is less than 60% of the national median equivalent

childcare including a commitment to increase the number of children's centres and a 125 million pound programme of pilot projects to tackle child poverty. There is a new commitment to make the child poverty target legally binding.

BU: The National Child Strategy (2008-18) sets out important measures in different spheres – healthcare, education, deinstitutionalization, family support, but although they reduce the weight of poverty they do not take children out of poverty. Measures should address the overall economic and financial policies. Even with this strategy, the **stated target is to reduce poverty risk amongst children to 15%, which is higher than the national official average.**

What is missing?

"If parents are poor then children are poor"¹³The EAPN "light year report" in 2007 highlighted the need to fight child poverty as part of an **integrated multidimensional strategy to fighting family poverty** rooted in child rights and child well-being. Key elements of such a strategy should include:- ensuring **adequate family income**, particularly focusing on women's income, as well as **access to key services like universal, affordable quality childcare, affordable and suitable housing, as well as affordable access to key basic services. Breaking the intergenerational transmission of poverty through specific support in education and training** is vital, together with early years support. A key focus should be on child welfare and development which includes promoting children's play as well as giving real support, time and resources to parents. Reconciliation of professional/private life is crucial, but must also extend to parents who are unemployed. Concern this year, has been to see how the important recommendations made in the Joint Report and in the Childcare Report had been implemented.

Key concerns

- **Lack of a consistent universal approach, with disconnected measures**

The countries with the lowest child poverty are generally those which provide quality universal services to support families, as highlighted by the Childcare Report. But no member states seem to be determined to draw on this clear evidence and recommendation, and there is the pronounced tendency to develop targeted and often piecemeal measures, on one element that impacts on child poverty.

Sweden has strong universal measures to support parents in having and bringing up children, including universal affordable childcare. However, the NAP itself responds to a growth in child poverty only by proposing the introduction of isolated measures i.e. measuring the eviction of families with children.

In Czech Republic, although seen as a field of social exclusion and part of a support to families at risk, the specific focus on youth and children is focused on support of free time activities and education.

Portugal: There are specific proposals on Child Poverty (within the 1st priority) but nothing very new, with the exception of the commitment to double the number of existing pre-school child care centres – "kindergartens"

Romania: "There are not specific proposals on Child Poverty, only an assessment of various programmes targeting children."

- **The continuing assumption that parent's in poverty are the problem**

¹³ (UK Social Policy Task Force – SPTF, Shadow Nap)

Most policies focus on individual solutions, and fail to recognize the structural causes of child and family poverty, which are rooted in inadequate income, poverty wages and growing inequalities.

- **Insufficient progress on quality, affordable childcare (AU, UK, IE, PL, DE, PT)**

Quality, affordable childcare was a key area of the Joint Report's recommendations and support given to make significant progress on the Barcelona targets. However, most members highlight that although some measures have been taken, they are simply not enough, and unlikely to make significant progress on these EU agreed targets. This will have the effect not only of prejudicing families on the poverty line, in trying to access work, but also directly impacts on the children's development and well being.

DE: "We welcome the target set for 35% of childcare for under 3's by 2013, but it is neither sufficient nor timely enough".

UK: "Poor families who cannot access quality affordable childcare are doubly disadvantaged, because parents have very limited choices of employment and their children have limited opportunities to be with other children"

- **Little analysis of unintended impact of targeted approaches**

Most member states are considering different forms of targeted approaches – in terms of both increasing family/child income support and in boosting educational/training support schemes for early years, and school drop out. However, often these measures are not sufficiently well thought through or subject to adequate social impact assessment.

Ireland: In July 2008, the Government introduced the Community Childcare Subvention Scheme (CCSS) as the means by which the NCIP would be delivered. Under the CCSS community childcare centres receive payment based on the income level of parents, rather than on staffing grants previously allocated. While a number of community childcare centres have expressed that they find the new payment scheme works, many others are facing major problems and financial difficulties.

- **Giving intergenerational poverty its proper place**

The need to break the cycle of intergenerational transmission of poverty is often highlighted, but not well integrated into the strategy. Challenging inequalities in access to education needs to be a central pillar - ensuring that children have every opportunity to achieve in and beyond school. However, opportunities should not be confused with outcomes, and education not used as the sole way out of poverty, implying only individual responsibility.

AU: "Child poverty is treated as an isolated occurrence, without sufficient reference to intergenerational poverty".

UK: "Concern is also raised about when the intergenerational approach is reduced to a concern only for education. Opportunities are no substitute for rights"

- **Too much focus on getting parents into work rather than adequate income**

The main focus is still on getting parents into work, rather than ensuring an adequate income. More debate is needed on how to make sure that work will provide a route out of poverty, whilst recognizing more explicitly the key role of social assistance and universal child benefits in guaranteeing adequate

income as a basic element to a child poverty strategy. Tax cut strategies which are currently on the increase, can be a useful tool, but can also give little advantage to parent's accessing low-paid jobs, often favoring disproportionately those on higher incomes. They also unfairly discriminate against parents who cannot work or access a reasonable job.

UK: "The focus remains on getting parents into work as part of the Government's Welfare Reform Green Paper, including mothers of ever younger children" (UK)...It gives no recognition that the impact of increased benefit sanctions to improve 'behaviour' among disadvantaged groups is likely to increase child poverty and exacerbate educational inequalities¹⁴.

Sweden: "The approach to child poverty assumes that the best way to combat poverty is to strengthen parents' access to work and support their family through their own income and tax cuts, but this approach favours those with high incomes"

- **Reconciling full-time work with child well-being?**

Child well-being is generally absent from most of the reports. As is the debate about how to ensure that the pressure on parents to take up full-time work (particularly single parents) will not prejudice parents capacity to give their children time, attention and support for a quality family life. Reconciliation of professional/private lives should also be recognized as a need for unemployed people. **Children's play** is a growing concern for some members.

UK: The Swansea Bridging the Policy Gap ¹⁵peer review of child play emphasized the central importance of free play for child development. As one participant said – "Children need to be happy now". A quote from the Social Policy Task Forces' input is included in the NAP, about the importance of child play to child development, but there is no policy announcement to go with it. (NAP 2008, p.27)

- **Insufficient analysis of impact of discrimination in access to services**

Although many reports highlight some specific difficulties of some target groups of children and families, there is hardly any focus on specific measures to tackle discrimination. A key group that concerns members is **asylum seekers and undocumented migrants**.

In Ireland, children of asylum seekers and undocumented workers do not qualify for Child Benefit "which the government still calls a universal payment and is a key mechanism for addressing child poverty. Neither do they qualify for early childcare supplement or other welfare payments. Parents seeking asylum only get 9.60 EU a week for their children and double for themselves" (IE)

- **Inadequate measures for key target groups.**

Although considerable steps forward have been taken on better data collection and understanding of the complexity of child poverty and the need to respond to specific groups of children and their families needs, this is rarely put into practice. The barriers for specific groups are not sufficiently recognized and the measures inadequate. Members highlight specifically – **lone parent families, ethnic minority and migrant parents and disabled children and carers**.

¹⁴ CPAG Report: 2 Skint for School: time to end the classroom divide. CPAG Policy Briefing March.

¹⁵ Bridging the Policy Gap reports – www.povertyalliance.uk

Ireland: Lone parents, continue to experience high levels of poverty and policy has not been successful in preventing poverty levels increasing.

Austria: No mention is made of the impact on loss of income for women lone parents when fathers' avoid or miss payments.

UK: Children of disabled parents and disabled children, run greater risk of poverty.¹⁶ The Runnymede Trust has also pointed to severe poverty faced by many black and ethnic minority children, especially children of Bangladeshi origin, 74% of whom are poor.¹⁷

- **Limited implementation**

Sometimes it is less the approach than the implementation that is at fault. Although many member states appear to have made progress on developing new approaches, the test will be in how far the objectives are achieved and delivered in the time frames announced. Monitoring and evaluation involving stakeholders, in order to highlight the continuing policy and implementation gaps is crucial.

*Hungary: The National Strategy on Child Poverty is an important step forward, but there has been **no progress** in key areas particularly the issue of school segregation (involving Roma and other disadvantaged families) or the lack of services for providing day care for 0-3 children. Other key issues include: lack of priority to child welfare, shortage of funds – limited to domestic resources, duplication of services, limited or haphazard impact assessment, failing to reach disadvantaged groups and regions, failure to recognize the central role of ensuring adequate family income (Hungary is still one of the few EU member states without a guaranteed minimum income scheme).*

4.2 Active Inclusion

The Active Inclusion concept has been fully supported by EAPN – in so far as it is used as an integrated tool for inclusion, through guaranteeing an adequate income, access to quality services and access to quality work. However the success of the concept depends upon how well Member States develop and implement a fully integrated strategy which combines effective measures on all three pillars based on a rights-based approach. Last year EAPN highlighted its concern that little progress seemed to be made in moving from a narrow activation approach, which is using the leverage of sanctions and withdrawal of benefits to “push” vulnerable people into any job, to a truly integrated approach. This approach should start from creating security in insecure times – i.e. guaranteeing income, basic services and be investing new resources and developing strategies which tackle the demand side of job creation and employer’s role to ensure the chance to get a decent job.

Key Findings:

- Although more member states appear to refer to the term, Active inclusion is still not a term used by Member States, still less applied in a holistic form.
- The major loser is adequacy of income, which is hardly mentioned and with few improvements.
- There is a disturbing omission of the impact of the looming financial/economic crisis – with its damaging impact on jobs, housing, income levels and social protection coverage

¹⁶ Quoted in the SPTF Shadow Report on the NAP 2008. Child Poverty Action Group recent report. Preston G and Robertson, M (2006). Out of reach: benefits for disabled children.

¹⁷

- Although there are several positive developments on activation policies (the main focus), in relation to helping people on the margins of the labour market into employment, there are concerns about creaming and how far these jobs take people out of poverty.
- Approaches to services, fail to tackle adequately the full range of flanking services that are crucial to support people into work, but also to live a dignified life. The measures that are proposed are often marred by inadequate funding, and the lack of a clear rights base.

4.2.1 Integrated Approaches? Activation not Active Inclusion

- Active Inclusion as a term seems to have been referred to by **more Member States** than in the past (BU, MA, CZ, AU, UK, DK, RU)
- However, it is **not generally addressed in a holistic form**. Austria is one of the few examples that targets clearly the three areas with specific chapters on access to the labour market, new minimum income and access to services. However generally, the focus is on boosting the employment rate of specific groups (BE, IE, SE, PL, HU, DE, RU)

Bulgaria: “Three elements of Active Inclusion are focused on – ensuring adequate income, increase of employability and access to quality services, but there is no mention of decent work”.

Belgium: EAPN highlights that active inclusion is developed through the strategy relating to activation and diversity, which focuses and gives targets for specific groups – women, school drop outs, disabled people; tackling unemployment, lifelong learning and school drop out. However they note, “Income and services are little taken into consideration”.

Romania: “Active Inclusion is only defined through support for active participation in the labour market (p.8) without clear correlation with the first two pillars”

- **In some cases the term is used, but the full concept not employed (MA)** or alternatively in the Czech Republic the concept is recognized but the term not used: “Active Inclusion in its philosophy is not mentioned but indirectly yes, i.e. it talks about quality services, labour support and income.

Some positive steps towards an integrated approach

In some Member States, members highlight some policies and measures which appear to indicate a commitment to an integrated approach, even if the term of active inclusion is not itself referenced.

- Ireland: The development of **active case management approaches** which recognize the need for personalized support linked to income are seen to be a positive step forward with an integrated approach – eg the Social and Economic Participation programme based in social welfare offices
- France: The **Grenelle de l’insertion** and the **RSA**, are seen as a positive developments by the EAPN network providing a specific impact on income and long-term support to accessing sustainable employment. (see below for weaknesses)
- Austria: A clearer commitment to a more integrated approach with central focus given to adequate income with a new minimum income scheme, improved access to social services and access to the labour market for those furthest away.

4.2.2 Activation: off benefits and into work, but not out of poverty

It is clear that most member states have attempted to raise the bar on activation policies, in trying to reach out to more disadvantaged groups. These are strongly welcomed, as long they are based in personalized approaches which support rather than pressurize vulnerable people along the pathway into work. However, there needs to be a real understanding and willingness to provide the resources to overcome the barriers to employment for multiply-disadvantaged people. This will mean greater emphasis on the responsibilities of employers, the protection of rights rooted in ensuring the dignity of people accessing work, and on tackling the genuine barriers to making work pay. The increasing use of sanction to pressurize people into often inadequate jobs, is seen as counter-productive, where active case management supportive measures are more effective to get people into the right jobs, and don't increase hardship for people already on the edge.

Positive approaches

The strongest approaches are seen to be those which put a premium on the personalized pathway approaches, focusing on individual needs and barriers, an emphasis on accessing quality of employment, commensurate with skills and the link to quality training/education. Several countries appear to be focusing on **low-skilled people**, however doubts are raised about the effectiveness of the measures. A further area that sees positive development is in tackling the **poverty traps** around the transition to work, with loss of benefits through tax-credit, additional payments and negative tax schemes. However, there appears to be little work done on quality work and wage levels. Some member states highlight a strong role for the social enterprises to support the integration into the labour market.

- *Sweden: highlights positive initiatives to reduce exclusion from the labour market, including **New Start Jobs** (introduced in January 2007), which targeted long-termed unemployed, people on sick leave, those with sheltered employment, newly arrived immigrants and people who had prison sentences and were on parole or conditional release. **The job guarantee for young people** introduced in December 2007, aims to help young people between 16 and 24 who are registered as job-seekers for 3 months. The job guarantee aims to guarantee work “commensurate with their abilities”, or return to education.*
- *Ireland: the **Social and Economic participation** programme with its focus on active case management approaches, based in social welfare is getting positive feedback on its initial implementation, however it's at a very early stage, and there are worries about long-term implementation. Ireland highlights the insufficient attention to **flanking services** – childcare, education, training, accommodation and health. The “**one step up**” life long learning strategy, targets low-skilled workers, but concern is had that this is not being accessed by low-skilled or low paid workers but by those with higher skills and more motivation.*
- *France: EAPN generally supports the proposals on **RSA**, which will give an additional benefit on the hourly rate for low income workers. This will apply to both unemployed people on minimum income accessing jobs and to low-paid workers. However, they highlight the risks for those who are **not able to work** – either due to their own difficulties or the lack of suitable jobs in the labour market, and the lack of focus on the most vulnerable as well as the young. The creation of a **sole insertion contract for market or non market sectors** is also welcomed, but recommendations are made on the need to extend the contract to beyond 24 months and highlight the lack of thought given to the situation of older people. The demand to work an average 20 hour week, could also cause difficulties where more vulnerable people, highlighting it represents more than a typical part-time job. The proposals on*

the **reform of professional training** is also welcomed, to improve the link between training and work. But greater focus needs to be placed on opening access to all “job seekers”, and in ensuring adequate financing at local regional level for those who are unemployed. This should be agreed with the social partners.

- **Romania:** “The development of the social economy sector is seen as the first step in reaching the objective of stimulating the spirit of entrepreneurship, especially for disadvantaged groups. The social enterprises should increase the degree of integration/reintegration on the labour market of vulnerable groups (people with disabilities, long-term unemployed etc)”.

Main policy gaps

- **Methods of targeting the ‘inactive’ can lead to more hardship**

Several countries are targeting the “inactive” population. However these approaches need to be aware of the dangers of creating worse hardship for the vulnerable groups, if they do not fully deal with the complexity of obstacles facing these groups in accessing work. Equal resources needs to be put into the demand side – to create new jobs, or jobs which can be filled by people furthest from the labour market, or ensure that employers are ready to give the existing jobs to these groups.

UK: *The Welfare Reform Green Paper “No one written off”, aims to support the currently inactive (disabled people and people with long-term health problems) off benefits and back into work. The positive elements are the additional support, especially for disabled people and increased skills support. EAPN queries however whether the support is timely or sufficient in terms of sustainability. Concerns are raised by some about the role of private organizations who have been contracted to get people back into work and will be paid according to performance. “The fear is that this will lead to cherry-picking the easy cases as well as increased, more punitive conditionality” Some members from the EAPN Employment Group highlight worries raised about increasing stigmatization of the poor. “When benefit sanctions were first introduced the rationale was to protect public money, but then it became more about about changing people’s behaviour, Job Centres are also being closed and people expected to travel up to one and half hour at their own expense, still the Green Paper stipulates weekly rather than fortnightly visits”.*

SE: *–many of the measures have been developed in a period of good growth, but now will be put into practice in a decreasing economy and worldwide financial crisis. “We don’t believe in the government’s analysis that reduced levels of income and sick leave support will lead people to good jobs. It’s not the right way to combat poverty and exclusion”.*

In Hungary, *The government has introduced “the path to work” – targeted at the inactive population which will affect around 180.000 people who currently receive social assistance. However the network highlights that it is a response to a demand to “tighten the conditions and eligibility for social assistance and reflects a rise in popular sentiment against the poor”. Social assistance recipients will now be divided into those who are able and who are unable to work. The first group will be required to carry out public service jobs, and get wages, and vocational training (it will be mandatory). When work is no longer available this group will receive a new form of assistance – but not based on family size. This is likely to result in income for families being reduced. “The fundamental problem is that it tries to deal with employment issues by “prodding” social assistance recipients and provides no solution for regions where the rate of unemployment exceeds 20%”*

- Danger of ‘creaming’ in skills training and access to labour market**

Several member states focus on raising skills, but the dangers are highlighted by EAPN Ireland that these may be used more by those with higher skills and who are more motivated regarding education and learning. There is also a concern about the lack of resources necessary to address the needs of 50,000 people identified as having significant literacy needs.
- Insufficient focus on accessing quality/decent work**

Very few member states highlight or mention how they will improve the quality of work. *Bulgaria highlights that active inclusion is too focused on people distant from the labour market, rather than a focus on the high rates of working poor, which is the most important group in Bulgaria, but for this no measures are envisaged. Ireland is an exception and refers to the problem of 6.5% of working poor.* However, the main strategies are limited to lifelong learning and developing the skills of low-skilled workers, rather than tackling minimum wage levels, pay levels and working conditions. Indeed UK highlight that the main approach to employers is to “*encourage employers to adopt flexible working and employment practices*”. Clearly “flexible” work arrangements are crucial for many target groups, (flexible hours/part-time and adaptable arrangements for leave) particularly disabled and people with long-term health problems, as well as to families, particularly lone-parents. However it is clearly not in the interests of vulnerable groups to be forced to take up short-term, temporary or precarious jobs, which are often disguised behind the pretext of flexibility.
- Lack of attention to necessary flanking services** – particularly related to childcare, housing, education and training and health. For example when supporting a single parent into work, an integrated approach which ensures access to these services will be crucial if the parent is to find and stay in suitable work. The provision of services between unemployment and work also needs to be seamless.
- Inadequate transitions between benefits and work** – with more thought given to compensation or continuity of key services when accessing work (e.g. the loss of free services – health/childcare/transport).
- More focus on quality training for unemployed and low skilled**

As highlighted by EAPN France above. A key need is to ensure that the unemployed receive quality training. This needs to be part of a sustainable lifelong learning approach which continues to offer quality training and access to education once in work and in the transitions between work and unemployment.

4.2.3 Adequate Income: Little improvement in coverage or adequacy

Income remains undoubtedly the “forgotten sibling” of the Active Inclusion triangle. In general, adequate income is not highlighted as an integral part of the approaches to supporting those furthest from the labour market (BE, DK, FR, DE, HU, MA, PT, RU, SE). **4 countries still have no minimum income schemes whatsoever, despite the 92 Recommendation (Hungary, Italy, Greece and Norway).** Progress has been made in a few important cases – in Ireland, Austria, Spain and Bulgaria. However, strong concerns are raised about lack of coverage and adequacy of benefits, and how this is calculated

and monitored and updated. The levels of minimum income schemes make little attempt to reflect real needs (related to consumption needs, basic services – energy/water/telephone/ rent or housing costs, transport – or any recognition of special needs). The majority of minimum income schemes are below the official poverty threshold and rapidly losing purchasing power. Rising energy, food and house prices are starting to impact, although recession may also bring a collapse in the inflationary tendency. A transparent method involving stakeholders in establishing and revising income levels related to real needs, must be established.

Lack of rights based approach endangering social cohesion

The continuing lack of a rights-based focus to ensure an adequate income for a dignified life is a failure to respect fundamental rights, and a barrier to social cohesion. The increasing instrumentalisation of benefits support as a lever to “prod” people into work, under the threat of sanctions or withdrawal of benefit is seen by EAPN members and grass-roots actors as a **social crime** (Finland) “*How can you withdraw the benefits of somebody who only lives on 440 Euros a month?*” (EAPN France). It is also ineffective in supporting people into sustainable employment. The lack of adequate information and personalized advice on people’s rights to income schemes, combined with sometimes insensitive behaviour by social services is leading to serious problems of low take up. This not only increases hardship for the people who most need it but reinforces stigmatization, and the antagonism against the “poor”. In the current times, this can only lead to a worsening of tensions in local communities – a real threat to the EU’s social cohesion.

- *In Ireland, adequacy of income has improved over the last 3-4 years, with the basic social welfare payment reaching 30% of the gross average industrial earning. However the minimum social welfare payment in 2008, is still below the 60% poverty income threshold for 2006.*
- *In Austria, a whole chapter is devoted to introducing the means-tested minimum income scheme. This scheme will cover all Austria and replace 9 Federal Social Assistance schemes. However there are key problems: The scheme is not fully agreed on yet and may not be implemented. The scheme does not replace the federal schemes but coordinates them. EAPN highlight also 4 key weaknesses“ it does not include a sufficient amount to cover rent and energy costs, or a guarantee to cover costs for special needs e.g. related to health care, birth of a child, necessary repair work to houses), does not touch upon major problems of inadequate take-up of benefits, also whether people accessing benefits are informed adequately and treated according to their rights (see study by EAPN Austria), lacks a clear link with new labour market integration strategies/projects especially with regards to integration measures for people who are only partly employable.*
- *In Spain, the approval of the measures of the Social Security Act at the end of 2007 was an important step to consolidate social protection, providing family support and protection of orphaned, disabled and widows with children, as measures to increase the working –life cycle and increase the correspondence between contributions and benefits with improved pensions*
- *In Bulgaria, new measures are being introduced by the Government to fight the economic recession, and have made a commitment to increase minimum income and also other measures, including a rise in pension levels and new scheme to get participation in retirement pension insurance for all.*
- *In France, the main focus is on the new RSA and “Grenelle de l’insertion”, which the Network supports. However “we wonder whether this draft law is not like a gamble carrying risks: it is a supplementary support only for poor people who are working” **Should only people who work be the priority of social policy?** At the same time there is an absence in the revalorization of the levels of the minimum income (RMG). NGO’s have asked that the RMG be increased by 25% over 5 years as*

has happened with the AAH (benefit for disabled adults) and the minimum income for the elderly. This has not been achieved. This is regrettable as they have lost a lot of their purchasing power in relation to the SMIC (national minimum wage). **We regret the lack of an unconditional right to the RMG (minimum income) and that people who only receive it can be sanctioned in the case of non-respect for an insertion contract. This right should be unconditional, since it is the minimum for survival. You cannot sanction people who are living on 440 Euros a month!!**"

- Hungary: Hungary does not have a guaranteed minimum income and the report doesn't mention the need to prepare or introduce such a scheme. On the other hand their top priority is to mobilize the inactive population. The new Path to Work scheme will divide social assistance recipients into those who are able to work and those who cannot. The former will have to do public work, for which they will get wages and do compulsory training (those under 35). For those who cannot work, they will receive minimal social assistance. The scheme "prods" social assistance recipients into work, but without clear guarantees of sustainable employment. **This will increase local conflicts and prejudices against those living in poverty**, and provide no solutions for regions and small communities where the unemployment rate exceeds 20% with few work opportunities.
- Norway: "There is no right-based approach to Minimum Income in Norway. Pensions have risen but are still under the poverty threshold. For social welfare benefits there is no benefit floor at all. The main obstacle is a policy based on myths about people facing poverty instead of realities"

Main Policy Gaps:

- **Right to adequate income for a dignified life**, has still not been guaranteed for all. The 92 Recommendation and the new Commission Recommendation on Active Inclusion, must be swiftly implemented to ensure that adequate income schemes are put in place and a viable process for updating.
- **Specific Recommendations** should be aimed at the 4 States where no minimum income scheme is in place (HU, NO, IT, GR).
- **Better participative mechanisms** are needed to establish, monitor and update adequacy Stakeholders are not adequately engaged currently in the process of budget setting.
- **More coherence to integrated active inclusion policies** – punitive sanctions currently undermine the right to adequate income leading to stigmatization and hardship.
- **Better information and advice** on rights and redress.

4.2.5 Access to quality services: Lack of rights-based strategies and inadequate investment

In general, the Services pillar of active inclusion is limited and dealt with inconsistently. Most members highlight that although mention is made of services, there is little focus or clear link to the active inclusion strategy and insufficient link to the overriding objectives of the OMC. Overall, the lack of a rights base is noticeably undermining approaches to guaranteeing access to services, particularly in relation to discrimination. Many members comment that specific services appear more as a disconnected list of measures. Some progress has been made in improving access in for example energy services or housing and health, but there is inadequate funding to meet the targets set and little recognition of the impact of the credit crunch and impending economic crisis, which in some cases is already resulting in proposed cuts to key services (e.g. Ireland – primary health care, social housing).

Members note that there is also surprisingly little focus on expanding essential flanking services to support employment – e.g. childcare, education/training and housing. Although there is increased priority given to housing and homelessness, there often seems to be a lack of a clear analysis and consensus over the extent, causes or solutions for the problems. Effective measures are lacking to prevent homelessness, and there is an over-strong focus on support to buy rather than on the need to increase provision of social housing for rent, or support to low rent in private sector. Neither is there sufficient mention of the importance of inter-agency working, which is crucial to ensure integrated services to tackle the multidimensional service needs of people experiencing poverty.

Positive developments

FEANTSA has highlighted in its assessment of the NSR, that most countries are developing or consolidating actions to tackle homelessness (Finland, Austria, Belgium, France, Italy, UK, Sweden, Poland, Denmark, Netherlands, Luxembourg, Hungary, Portugal, Slovenia, Slovak Republic, Czech Republic, Rumania, Spain, Estonia and Latvia). They highlight an increasingly comprehensive approach, but lack of data makes it difficult to assess their true impact. There is still no comparable data on homelessness and FEANTSA reiterates the urgent need for more quantitative data to develop indicators to monitor trends, based on a clear working definition of homelessness. **The Written Declaration 111/2007 on ending street homelessness by 2015** signed by 438 MEPs, although not generally mentioned, appears to support more ambitious aims to reduce or end homelessness rather than just manage it.

Some examples:

AU: Affordable Housing and Assistance to Homeless People” are among the key measures in the Austrian NSR. This includes measures to prevent eviction “to tackle homelessness at the source.” The primary objective of assistance to homeless people is to stabilise the social situation of homeless persons and to allow them to return to independent living as soon as possible. A varied range of services – from street work, easy-access day centres, emergency hostels and transitional housing to socially assisted forms of living – is made available by the Länder

BE: One of the three key priorities in the Belgian NSR is “Guaranteeing access to quality, sustainable and affordable housing to all” which involves increasing the supply of shelter, temporary accommodation, and social housing. The Belgian government is looking into the possibility of developing a national homeless strategy coordinated at national level with cooperation of all three regions (Brussels, Flanders, Wallonia). This would include elements such as increasing access to temporary forms of accommodation, preventing evictions, offering access to housing to households living in insecure or inadequate forms of housing.

SE: FEANTSA highlights that strengthening groups in particularly vulnerable situations” including “Continued efforts to counteract homelessness and exclusion from the housing market” are important pillars of the Swedish NSR. Tackling homelessness and exclusion from the housing market were one of the four key priorities in last NSR 2006-2008 and the Government presented a strategy which extends to 2009. “Tackling homelessness requires sustainable and coordinated efforts, and homelessness therefore also constitutes a priority area in this action plan.” This will involve measures covering eviction prevention (in May the National Board of Health and Welfare and the Swedish Enforcement Authority published guidance on efforts to prevent evictions), outreach activities with expertise from both social services, health care and the voluntary organisations, and monitoring homelessness trends (the National Board of Housing, Building and Planning will therefore survey the secondary housing market every three years, beginning in 2008).

Main policy gaps

- **Lack of coherent, integrated strategies**

Some member states attempt to present integrated strategies to the development of services, particularly social services; this is welcomed. However, often there appears to be a lack of coherence to the strategy, with little justification, context or process for evaluation. (IE, UK, AU, BE).

In the UK, a specific objective (3) is given to this aim. The focus is on children and minority ethnic groups, health inequalities, reducing re-offending, services for older people, access to decent housing, preventing homelessness, transport, financial inclusion, digital inclusion, and the Public Services Targets and Families at Risk review. All these are reported in terms of targets, structures, funding and projects, but very briefly, without context, evaluation and integration into the overarching narrative.

AU: Social Services are mentioned and the section includes some integrative measures in the fields of housing, over-indebtedness, prevention of violence, better integration of migrants, asylum seekers, people with disabilities, access to public transport and cultural inclusion – but this is far from being strategic.

- **Under-funding of public and NGO services**

Although some progress may have been made in delivering specific services, objectives are being undermined by insufficient public funding to provide adequate coverage or access – eg in relation to rural services, and a growing threat of actual cuts in services as a response to the economic downturn. NGO's as vital service providers with a specific value-added in terms of quality services, are not sufficiently acknowledged in the reports, nor the need for increased financial support, in the coming difficult environment. Many NGOs are indeed seeing their own funding threatened with the financial cutbacks.

IE: There has been a lack of funding in some areas to meet set targets – e.g. for primary health care teams. There is also a concern that in the current economic climate, even recently announced strategies e.g. in relation to homelessness, will remain unimplemented or will fall short of the levels necessary of targets outlined in the strategies.”

AU: The report presents a mix of initiatives that are partly taken by NGOs with little public funding support. A study on social services provided by NGO's is mentioned, but the key findings in relation to the need for funding of social NGO's not taken up, also the lack of services in rural areas, services for migrants and the need to extend in extended labour market and social enterprise.

- **Some recognition of need to ensure access to Services of General Interest but inadequate measures.**

There is a small increase in Member States who have included a focus on Energy or Fuel Poverty (E.g. UK/BE), but some who highlight the notable absence (MA).

In Belgium, an important development has been the recognition of the need to ensure access to energy for all – within the analysis of housing need. This reflects the solid work carried out by the Energy and Poverty Campaign over the last 10 years, which has won important concessions including minimum guarantees of services, restriction on fuel cut offs, rights to pre-payment meters on equivalent cost.

However, there are no specific measures related to other Services of General Interest - e.g. water, transport etc.

In the UK, which has a Fuel Poverty target, there is reference to the need to provide extra help to combat fuel poverty, but this is not seen as adequate to deal with the current 40% increase in household bills.

- **Lack of coherence between housing and homelessness policy**

In some national networks view there often appears to be some **confusion over the precise aims and objectives of housing and homelessness** priorities and strategies. A lack of a **coherent, integrated approach is sometimes evident** linking the prevention of homelessness and right to housing. This would ensure an accessible, affordable housing market for all whilst providing effective support to the homeless through emergency accommodation and support to independent living in appropriate housing.

France: Increases in housing benefits are welcomed in the context of the existing underpayment of housing benefits and urgency in the law on finance. However, the system of housing and emergency accommodation is being severely affected by the principle of continuity which whilst welcomed by the associations is leading to overcrowding in places initially planned for short-term emergency accommodation and now transformed into longer-term “stabilisation” accommodation.

- **Insufficient investment in social housing and low-rent market**

There is a general withdrawal from investment in social housing. Without this basic public commitment, most of the measures proposed are purely cosmetic. A worrying development is the prioritizing of public investment in houses to buy. This policy prioritises people on higher incomes who are in a financial position to take on mortgages whilst reducing public housing supply and access to housing for people in poverty. Following the current sub-prime fiasco and financial crisis, it would also appear to be a policy strategy that needs urgent revision as an appropriate response to ensuring adequate access to quality housing supply for all.

UK: There is no commitment to house building, but reference to a Housing Reform Green paper by the end of 2008.

FR: The progress on the law on “Mobilization for Housing” and the upgrading of older areas is positive, but apart from this most measures seem to be mainly technical and their effect will remain marginal.

There is also a definite setback as far as the care of people on low incomes. Home ownership, as provided for in Article 15, is included in the 20% of social housing that local governments have to provide. This risks disadvantaging people in poverty. These people are not able to access home ownership, often even social housing, because their income is too low. They need rented social housing. If the Governments can build social housing for ownership this means less chances of access to social housing for people on low incomes. Associations also fear for the principle of social mix. Expelling people whose incomes are slightly less than the income ceiling for social housing into the private housing rental market which are on average 50% higher is not necessarily good. Overall, no major measure is in place to solve the housing crisis. This draft law worries NGOs more than it reassures us about the real will of the government to make housing a priority and putting the Housing Rights law (DALO) into practice, particularly with the announcement of a 10% cut in expenditure in the 2009-11 budget.

- **Lack of emphasis on structures for delivering integrated services**

The tendency is still to view the delivery of social services from an administrative perspective. A user focus emphasizes the need for prioritizing integrated services dealing with the multidimensional needs of people in poverty. In practice this means either one-stop shop access points, or improved inter-agency working – at the level of design, delivery and evaluation.

Ireland: The Plan does not address the issue of inter-agency working which is crucial in the design and delivery of services.

4.3 Low priority for integration of migrants

Although there is a minor increase in the mention of migrants, EAPN members highlight that few new proposals are made (BU, ES, IE, DE, PT). Bulgaria is one of the few countries that refers to the National Strategy on Migration and Integration for 2008-15 and annual plans, Bulgaria now having become a country of immigration. In Spain, an important initiative has been the expansion of the fund to support the reception and integration of immigrants and the strengthening of education.

Members highlight that reference to migrants, where it is made, is generally narrow, and does not take a broad social inclusion or Active Inclusion approach

UK: "Migration and migrants are increasingly seen as a justice and home affairs issue and an economic advantage or disadvantage"

BU: "The measures are driven by the needs of the labour market and seldom are concerned with the wider social integration of migrants,"

In general there is an inadequate analysis of the social and economic reality or problems migrants face in relation to **residence status, or the reality of those who face multiple barriers**. (i.e. asylum-seekers, undocumented migrants, migrant families and children, migrants with disabilities or with disabled children).

Main focus on literacy, some support for children and youth

Where policy proposals are made - major emphasis appears to be on programmes to challenge illiteracy and promote language skills (AU, BE, FR, UK). Although these are useful instruments to support integration, members highlight that often a clear enough separation is not made between general literacy programmes and the specific needs of migrants. The approach of Sweden is positively highlighted. Migrant children have a right to specific individual tutoring in their native language as well as in Swedish, building on the pedagogic assumption that 2nd language speakers need to embed first the mother tongue, for effective language learning. Some positive references are also made to initiatives to meet the needs of young migrants (AU). New initiatives to provide advice centres for migrants and to improve school attendance and performance are also highlighted (eg Belgium – German Community). In Ireland, a Task Force on Integration will be set up to progress policy development. The provision of services of English as an Additional Language will also be evaluated, *"this is important as there is currently confusion in the budget for this programme and general literacy supports"*.

Key policy gaps:

- **Inadequate access to rights – adequate income, jobs and services:**

In general, with no explicit rights-based focus many migrant groups slip through the net and some are explicitly excluded. Even where the groups concerned have rights, there are major barriers in accessing basic rights, particularly in relation to acquiring a basic income to live on and access to services. Asylum seekers and undocumented migrant workers are particularly vulnerable to exploitation in the workplace.

In Ireland, Asylum seekers are not mentioned as a group in the NRSSPI, although they are a group which experience high levels of poverty and social exclusion. Asylum Seekers in the direct provision accommodation system only receive 19.10 Euros a week and 9.50 for children. The issue of a migrant's legal status is not addressed and status is a major determinant of a person's ability to integrate and their wider quality of life. Ireland has refused to incorporate the Reception Directive into national legislation which could permit migrants to work under certain circumstances. Migrant workers who become undocumented through no fault of their own are in grave danger of exploitation and also having to leave the country despite potentially having worked and contributed to the economy for a number of years. The children of asylum seekers and undocumented workers do not qualify for the Child Benefit payment which the government still calls a universal payment. They also do not qualify for early childcare supplement or other welfare payments (Ireland).

- **Little reference to discrimination or positive anti-discrimination measures.**

Discrimination against migrants is not raised as an issue, nor issues of racism for example as a barrier to the labour market or to educational integration of children from migrant families so no anti-discrimination measures are introduced... "(Austria)

- **Inadequate response to challenges of over-qualification and de-qualification.**

Many migrants meet major difficulties in accessing employment adequate for their qualifications. Not only are there still major obstacles to getting their qualifications validated, but they are often "channeled" to lower status, unskilled and poorly paid jobs".

There is hardly a reference to the "over-qualification" of migrants and the processes of de-qualification which have been proved by a recent study. (Austria)

- **Inadequate funding**

Even where some projects are developed, insufficient funding is likely to prejudice their outcomes.

Migrant projects are given some priority but not backed by adequate funding (Norway)

- **Lack of social impact analysis**

The biggest gap remains the failure to analyse the negative impact of major policy initiatives particularly related to immigration rights, through systematic social impact assessment.

The lack of poverty proofing or impact assessment to assess the negative impact of other policies (particularly with regard to residency rights and the lack of access to work permits) are having a negative effect on the situation of migrants and asylum seekers (Austria)

5. Discrimination and Equalities – lack of strategic approach in access to services, apart from jobs

Although there is some increased visibility on discrimination with some countries introducing new strategies and measures (BU, SE, UK, PT, BE, RU), members highlight the general lack of cross-cutting priority or specific anti-discrimination strategy. There often appears to be a **lack of clarity** on the aims of policy in this area. Whilst Equal Opportunities is the dominant approach (when named), this often does not adequately tackle direct and indirect discrimination in access to rights, resources and services. Others are promoting more sophisticated Diversity approaches (UK). Some members have the impression that whilst the “*terms*’ of gender mainstreaming and equal opportunities are used, these objectives are not understood nor effectively mainstreamed into the overall strategy (PT, IE). **The overwhelming policy focus is generally in relation to discrimination in accessing the labour market for specific target groups.** (BE, UK), although there are some examples of greater concern about access to key services e.g. health (GE).

In terms of the impact on **specific target groups** - there is some increased recognition of the needs of migrants (DE) and ethnic minorities (BU, PT, HU, CZ, UK,) particularly Roma and Travelers (HU, BU, CZ, IE, UK, RU) and for people with disabilities (BU, RU). However, discrimination due to sexual orientation, religion or belief is generally absent. The proposed measures are often too general, or fail to reach the socially excluded people in these target groups, or to deal with multiple disadvantages.

BU: Anti-discrimination measures are targeted at Roma, people with disabilities and women, and there is an attempt at mainstreaming, but they usually reach the middle class from these groups (for example with Roma mediators, highly qualified people with disabilities and middle class women. The more people suffer from multiple disadvantages, the less effective are the measures.

RU: Discrimination is mentioned in related to disabled people and to ethnicity, one of the measure proposed for the Roma is promoting anti-discrimination policies through national awareness-raising campaigns.

Gender mainstreaming is less highlighted, although many NSR contain specific sections on Gender perspective (IE, UK, PT, ES). There is some focus on the gender pay gap (DE), but “*no clear indication that the issues are understood e.g. in relation to structural inequality. The focus is on equality of access but no focus on equality of outcomes and how it is to be monitored or addressed*”(IE). There is little recognition of multiple discrimination or strategies to tackle it. The key area of poverty pensions for widows or gender violence is not addressed (ES)

Positive developments in policy and delivery

SE: Discrimination is highlighted as an important problem that must be dealt with in several areas. During the spring of 2008, the Government presented proposals for a new law on discrimination and a new law on the Ombudsman against Ethnic Discrimination. The new legislation covers all grounds on discrimination and enters into force on the 1st Jan 2009

CZ: “Prevention of discrimination in accessing housing for specific groups is mentioned- which is important”

DE: Recognition of the need to ensure equal access to the health system for all, which does not correspond to the daily experience of those who are part of the general system compared to those in private insurance.

HU: Reference is made to 3 key groups: women, disabled people and Roma. The document treats the issue of discrimination in two issues. The more pronounced is workplace discrimination and unfair treatment in accessing employment. The other focus is tackling discrimination for Roma children in Education”

UK: Objective 4 of the NAP is Tackling Discrimination and mentions women, people with a disability, older people, minority ethnic groups, and specifically Gypsies, Roma and Travellers.

BE: At Federal level, an inter-ministerial group on discrimination has been set up. New anti-discrimination projects are also being developed in Flanders

ES: The Organic Law 3/2007 grants Equality to Women and Men by implementing equal treatment and action against direct and indirect discrimination, in any sphere.

Main policy gaps

- **Lack of integrated strategy**

A broad, integrated approach to tackle discrimination in all areas of access is vital, covering both preventative and proactive approaches.

IE: The issue of discrimination is not adequately addressed, although it has a major impact on access to goods, services, and employment. This is an ongoing trend, including in the National Reform Programme. Discrimination is only mentioned in passing in terms of groups access to the labour market but no strategies are outlined or critiqued. The National Action Plan Against Racism which is a very positive strategy, is outlined but this comes to an end in 2008. There is no sense of what funding may be available to continue it after this. The indications are very negative.

- **Narrow focus on employment**

Although anti-discrimination legislation is to be extended to areas outside of employment, access to goods and services and for all groups, the emphasis in the NAP remains overwhelmingly on discrimination in accessing and while in work. Whilst this is a crucial area, a broader approach is vital to deal effectively with all areas where discrimination is evident, both in preventative and proactive approaches.

UK: Equalities are a high priority in the UK, with a well established legal and institutional framework, but the main focus is on discrimination affecting working lives. The Bridging the Policy Gap report¹⁸ suggest the need for stronger enforcement of existing anti-discrimination legislation and better information”

- **Limited approach to target groups**

The predominant discrimination focus is in relation to ethnic minorities, and migrants, followed by the disabled and women. However, measures to tackle sexual orientation, religion and belief are not mentioned, and there is little emphasis on how to tackle multiple discrimination.

¹⁸ See Bridging the Policy Gap Report. www.povertyalliance.org

AU: Specific issues are missing eg young girls needs in relation to the fight against youth poverty, and discrimination due to sexual orientation, religion/belief is not mentioned at all.

- **Inadequate pro-active measures, particularly in the current climate**

Even when strategies or policies are in place, the measures are too limited and unclear about how they will meet their objectives. Little recognition is evident of the impact of the economic crisis on discrimination against certain groups, or the need for more effective measures.

IE: "Discrimination or racism against migrants exists but has not been a major issue when the economy was growing. However, in the current climate of rapidly increasing unemployment, there is a fear that negative attitudes to migrants will increase"

RU: Discrimination is mentioned in relation to disabled people, and to ethnic groups – Roma, but only through national awareness raising programmes"

HU: "The identified solutions to tackle discrimination in the workplace and in education for Roma, appear to be ineffective (legal aid, Equal Treatment Authority etc).

ES: There is a need to strengthen legal protection against racist acts and discrimination on all grounds. In Spain the legislation does not do this yet"

6. Building to 2010: Little sign of momentum

Minimal link to 2010

The overwhelming number of Member States make no mention of 2010 (AU, BE, BU, DK, DE, HU, IE, MA, NO, PO, PT, RU, SE, UK). For most EAPN members this is a grave oversight, indicating both a lack of action around preparatory activities for 2010, a disconnection between the organizing bodies and those responsible for the NAP and a lack of ambition for progress on eradicating poverty and social exclusion in a positive post 2010 agenda.

BU: The period covered (2008-10) should be linked to 2010, which is the European Year for Combating Poverty and Social Exclusion related to the original Lisbon Agenda when the leaders of the Member States agreed to make a significant impact on Poverty by 2010. On page 34 there is a selective mention of another Lisbon objective – achieving 50% employment of elderly workers, but nothing about poverty. This despite the fact that the Ministry is actively cooperating in the EAPN General Assembly in September – dedicated to the European Year for Combating Poverty and Social Exclusion"

PT: Nothing about 2010 is mentioned. This is quite worrying. This NAP doesn't show any perspectives towards the future (i.e. after 2010), even if some of the measures will already cover that period.

Where mention is made, the information is often very general, relating to information and awareness campaigns (CZ). Although for EAPN CZ this is positive in at least recognizing a general commitment. EAPN ES highlights that at least the responsibility of the Spanish Presidency for organizing part of the year is recognized and the basic principles for 2010.

Missing information on real developments

However, this does not mean that no action is being taken. As EAPN and other NGOs have been very active in promoting preparation of the European Year, there is evidence of activity from many member states although this is not accurately reflected in the NAP.

BE: Although there is no reference in the NAP, there are several references in the Federal Plan to fight poverty and social exclusion (Flemish) to 2010. This includes:

4) Financially support the Belgian anti-poverty network in developing a work programme of activities in Belgium during the EU Year 2010. Funding is provided for preparation (2009), execution (2010) and evaluation (2011)

9) Stimulate the participation of associations representing people in poverty in the development of the programme for the Belgian Presidency during 2010.

EAPN BE highlight that apart from the participation of EAPN, and the Belgian network, also the Service of the fight against poverty, information and capacity building will be necessary to enable people in poverty themselves to play a crucial role.

NO: The Ministry will have talks with the Commission, shortly. They are aware that the network wants to arrange activities in 2010, and be part of the year, but there is no budget as yet'

UK: The organization of 2010 has been discussed in the meetings with the Ministry. The Social Policy Task Force which represents civil society which EAPN chairs, will have a key role in the 2010 National Implementing Body, but its start has been delayed..

In most cases, EAPN networks are pressing for greater stakeholder involvement and particularly a detailed discussion on how to involve people experiencing poverty in the 2010 year.

HU: We have highlighted to the Government in our response to the NAP that it should include a commitment in cooperation with EAPN HU to develop a method and structure for 2010 to involve the poor in the planning and evaluation of the implementation of 2010. The proposals have been received with total indifference.

7. What is missing from the NAP?

Most EAPN members share common perceptions on the overriding weaknesses of the NAP.

- A lack of political commitment or visibility for the NAP as a key instrument in the fight against poverty.
- The NAP continues as a report not a plan, which describes current or past actions, and makes no new proposals for the future.
- Little evidence of the NAP as a comprehensive, multidimensional programme to combat poverty and social exclusion, according to the original objectives of the OMC.

However, there is also strong consensus on other key gaps:

- The lack of an overarching national anti-poverty programme (BU)
- Despite the strong emphasis at EU level, there is a considerable lack of a coherent approach to Active Inclusion at member state level. (RU, PT)
- Although the link between poverty and inequality is clear, the lack of evidence, data and analysis in the reports, only underpins the lack of strategies to tackle growing inequality (SE)

- Hardly any reference is made to the changing economic climate, and, although the NAP was written over the summer, when the credit crunch first appeared and the potential impact on increasing unemployment was starting to become evident. (UK, POL, HU,IE,)
- The need to get more involvement and connection from other government departments and the Parliament (ES)

Other missing approaches and themes:

- **Lack of urgent action to reduce poverty** (BU –highlights that the government quotes its objective of 15% at risk of poverty which therefore allows an increase in poverty levels)
- **No reference to the EU social agenda.**(UK) and other important EU concepts like high quality employment, and workplaces, life in dignity, social rights and social standards(BU)
- **Lack of specific targets and concrete indicators** (PT)
- **Progressive redistribution mechanisms.** (ES)
- **Solutions for energy poverty and increasing prices:** (AU, HU, MA). Malta highlights the fate of new families “who up to now have not been considered poor but due to energy prices they cannot afford such utilities”, victims of usury
- **Bad lending, extortion and indebtedness:** (HU, MA) – proposes a study to identify the extent of the problem and what assistance can be most effective.
- **Provision of educational resources to asylum seeker minors, particularly minor unaccompanied asylum seekers-(98% of them do not receive any schooling.** (MA)
- **Focus on access to affordable health and dental services** (Norway)
- **Right to adequate income (Norway) and increasing levels of Minimum Income** (BE) gives the example of pensions being pegged above poverty threshold.
- **Measures to support training and information for NGOs and public sector** (PT)
- **More concrete link between measures and Structural Funds** (PT)
- **Better governance at all stages** (PT)

8. Mainstreaming – Increased coordination but no progress on impact assessment

The Guidance Note (2008) makes important recommendations about the need to ensure mainstreaming and a closer articulation between the OMC and the revised Lisbon Strategy as well as other policy fields. Specific reference is made to the need to improve “feeding in and feeding out”, or (how the OMC contributes to economic and employment objectives – feeding in, and how Lisbon contributes to social inclusion – feeding out). However, mainstreaming implies a broader approach than this. Few Member States appear to be actively developing effective social impact assessment or poverty proofing mechanisms which will enable them to mainstream social objectives of the OMC into all policy areas. EAPN hopes that the Peer Review on the Social Impact assessment was organized in November 2008 will have a positive impact on these developments.

Increased institutional mechanisms and coordination

Several EAPN members highlight a certain increase in the “statements” around improved interaction between the OMC and Lisbon. (AU, BE, DE, HU, IE, MA, PT, RU, UK). But sometimes this appears more wishful thinking than reality.

Bulgaria: “The NAP states that the National Reform Programme includes measures for improvement of standard and quality of life and for the social protection of the most vulnerable. However we do not find this in the NRP.”

Some clear progress has been made in terms of **coordination** between the two processes. However the impact of this coordination is not so evident in terms of the content of the report. In some countries, the setting up of **broader institutional mechanisms involving higher level politicians** has been crucial.

MA: Although it is mentioned in the Common Overview that the report is parallel to other policies including the NRP, there is no clear strategy on how these will interact

AU: Some progress have been made as finally some contact and exchange between the two responsible ministries has occurred and the Social Ministry to some extent was included in the NRP; however there is no visible output of this in the two plans. The NAP also mentions a planned study on a more coordinated approach to Lisbon, and from some recent meetings organized by the Social Ministry and the Chancellors office some steps towards cooperation between different ministries involved in the different pillars of the Lisbon Agenda is taking place.

IE: In the assessment of the Social Situation there is a reference to the targets of the Integrated Guidelines, which are on target to be met. In the NAP inclusion a reference is also made to the measures outlined under Objective 2 (Access to quality work and learning opportunities) are informed by the NRP. However, they are mainly measures already contained in other Government strategies and in the Social Partnership Agreement towards 2016. The Consultation for the NAP 2006-8 informed this agreement, but not to the extent that EAPN Ireland hoped. The institutional mechanisms for the NAP have been strengthened. The Cabinet committee on Social Inclusion, Children and Integration chaired by the Taoiseach (Prime Minister) is important.

A more worrying concern is the likely **outcome of such coordination**. In a situation where the Lisbon Agenda, or growth and jobs priorities, has more political clout, the worry is that the Social OMC will not necessarily benefit from this closer relationship, unless the main priority is the reduction of poverty and social exclusion. The question about how **stakeholders will be integrated into these coordination mechanisms** is also crucial. Others highlight that mainstreaming is less about the interaction with the Lisbon NRP, as such, but more importantly should address poverty proofing all domestic policy areas and actively promoting the input of social policy, its ministers and stakeholders in the broader policy discussions.

DE: Yes, there is mainstreaming, but in the centre is not the idea of poverty reduction but of ensuring the economic situation of Germany in the world. i.e. less taxes for enterprises...”

PT: There is a clear statement that a reinforcement of governance is being made. We welcome the idea of a coordination Platform of the various National Plans and a focus group on focal points of various ministries, but this would be a very good idea if poverty and social exclusion will be the leading force in these structures. We are worried about what kind of participation of NGOs will be assured. We're afraid civil society will lose power of representation”

UK: There is mainstreaming in so far as eradicating child poverty is an overarching goal in both the Lisbon and NAP frameworks. However, mainstreaming should not just be identified with the Lisbon NRP. It means poverty proofing across all domestic policy space.”

Little progress on social or poverty impact assessment

Few members highlight improvements on the integration of other mainstreaming tools in the NAP (BU). Where assessments are in place, the guidelines are generally valued, but the lack of transparency of the process or the involvement of grass-roots stakeholders undermines their usefulness.

IE: Poverty Impact Assessment is outlined in the NAP as an important part of the monitoring and implementing process of the NAP Inclusion. Although there are good guidelines in place, the implementation of the PIA is not a transparent process, so an assessment of its impact is not possible. It does not involve people experiencing poverty and their organizations.

9. Pensions, Health and Long-term Care: unmet potential for mainstreaming social inclusion across all pillars

The majority of EAPN networks did not have the resources to respond to these sections of the reports. This however also reflects the fact that these pillars are not generally “streamlined” at national level, and are dealt with by different departments and ministers, following a separate process.

“The process is not interconnected (only the report is), the Commission for Social Inclusion deals only with the NAPSI- no information about the other parts, how they are organised, when, where was given” (CZ)

In general, there appears to be a much weaker stakeholder process in these pillars and normally the NGOs working on poverty issues are not invited to be part of any process that does exist.

PT: “In the 2 other pillars there isn’t any participatory process open to civil society. And we have a doubt that a sustained coordination between the two pillars and Social Inclusion was concretized”

UK: “We had no invitation and no time to do it. We did raise the issue about where and how pensioner poverty would be dealt with.”

However, EAPN members are very concerned about the **content** of these strategies and how far social inclusion concerns are streamlined across the pillars. They would generally welcome more efforts by national governments to develop some integrated stakeholder debate on key areas of concerns. Where EAPN members were able to make comments, it brought with it clear benefits in promoting more awareness of poverty issues in the fields and building a stronger relationship with the NGOs concerned. An example of impact is seen below:

BU: EAPN was able to make comments on both pillars. The National Strategy for pensions is a report on existing policy measures and the other part is cut and pasted from the legal framework, however some energetic measures have been taken to improve the level of pensions, the trouble is the problem of

inequalities is not considered and not enough measures for poor retirees. The National Strategy for Health care does not contain any quantified objectives and isn't a plan. We insisted the text be revised to answer the questions – when, how and how much. Some of the measures are also in danger of embedding the existing high inequalities in access to health care – for example tax concessions on the voluntary insurance instalments is another example of mechanical transfer of the three-pillar pension system to the health care system. The measures are also not targeted at people in poverty “The prices of medicines should not exceed the average price in the new EU member states”, when the living standards in Bulgaria is much lower.

AU: “We were able to make comments but only on health and long-term care, due to lack of time, resources and expertise. But there is much less contact with the Ministry of Health and we only started to work on raising awareness on poverty issues with the 1st Strategic Report 2 years ago. 1.5% of the Austrian population are not covered by the Social Security System. People who are on social welfare don't get the E-card, which has a stigmatizing impact on them as they are “marked” as poor. In the report it is only stated that there is an effort to adjust the situation of people on social welfare to those of insured persons, but no concrete measures. Also what is missing is a national action plan to reduce health inequalities. A positive measure is the increase of the allowance on nursing care, but it doesn't cover the costs of nursing care and most people in nursing homes are on benefits. It would be important to create a system that covers the costs of nursing care on a solidarity basis as it does for illness”

RU: Romania has adopted a system based on the diversification of sources of pensions in order to generate financial security for the elderly. The system tries to reduce risks from replacement revenues for old age, by implementing private pensions. The National Strategy Report also includes an analysis of the national strategy for health and long-term care, supporting informal care, modernizing the infrastructure and involving beneficiaries in the development and implementation of community programmes is a medium term priority. The main problem however, remains the need to move from a system where government subsidises the beneficiaries to an investment in infrastructure and a contract with long-term care providers.

Key areas of concern for EAPN include:

- Sustainable financing of social protection and pension systems which will guarantee access and adequacy of pensions for all.
- Access to affordable, quality health services (particularly the impact of privatisation/liberalisation on funding and provision models)
- The implications of the shift to financing users, rather than a direct investment in care or health provision, which undermines the sustainability of the sector.
- Who will care for people in poverty? – the impact of current development on services to provide dependent care for people on low incomes and socially excluded groups.

Proposals to improve delivery of social inclusion in other 2 pillars.

- Give priority to the development of a coherent EU and national strategies to reduce health inequalities and to guarantee adequate pensions for all.
- Highlight and exchange benefits of good models of streamlined processes, particularly how social inclusion has been mainstreamed across the pillars.
- Provide accessible information/follow up to NGOs on the implications of developments in the 2 pillars for social inclusion.

- Encourage joint meetings/process in key elements of the development of the strategies where there are common concerns – e.g. access to health care transferring the governance model from the NAP Inclusion.
- Propose the development of a specific People experiencing Poverty direct debate on the 2 pillars.
- Resource stakeholder involvement – particularly poverty NGO's without independent financing to engage in the other pillars

10. Promoting Better Governance: Building on signs of Progress

The Guidance Note provided strong guidelines to Member States to improve the extent and quality of the participation of all stakeholders, including NGO's and people experiencing poverty, at all stages of the process – from design, to delivery and implementation. This year, EAPN members divide Member States into 4 groups:

- **A significant number highlight progress in the participation/governance process of the NAP** (AU, BU, CZ, DK, FR, MA, POL, ES) many of these are new member states.
- Others highlight the **continuation of an embedded structural dialogue** which serves as a good practice model for governance on the NAP (UK, BE).
- In other cases, **the governance process seems to have stagnated** with little improvements despite Commission and Stakeholder comments (DE, HU, PT, RU).
- Whilst 2 members highlight worrying **set backs** in the governance process (IE and SE). In the case of Ireland, this is particularly unfortunate as they were the case study of good practice for governance and participation of people experiencing poverty in 2007 in their National Inclusion Forum.

Building better governance models based on participation.

In general the main improvements were made in terms of **broadening the number** of stakeholders, **improving the number, timing and quality of exchanges/meetings** and **strengthening the steps of the consultation process** (to include involvement in the discussion of priorities - before the first draft, in response to the draft and on in some less frequent cases – after the publication and linked to implementation. In other less frequent cases, **there was significant improvement in raising the visibility and link with the national political process** (e.g. France and Belgium televised the Parliamentary Debate). However, the progress is rather piecemeal as most of these examples improve some but not all of these areas, and there is still a clear lack of evidence that there is a very systematic approach to establishing an on-going dialogue with stakeholders, along the lines of the Guidance Note.

AU: "The process has improved. Stakeholders were involved at several stages (all were invited but the degree of involvement of regions and other ministries was diverse). The process also started very early, which is a good thing. Stakeholder comments were published on the website together with the plan. The fact that the minister himself was present was a symbolic indication that the process is taken more seriously. However, these improvements are quite relative, given the fact that the plan is not a plan but a report and has no impact on future policies. People experiencing poverty were not directly involved, EAPN Austria are expected to integrate their views and the results of the Austrian PEP meetings (that are funded by the ministry) into their input. EAPN Austria was involved at all stages.

BU: For the first time there was an attempt at a proper consultancy process. However, EAPN Bulgaria does not agree with the statement in the NAP (p.23) that "the already established practice that the NGO sector

only gets involved in the stage of a developed project rather than the initial vision and policy design was confirmed». After the draft was elaborated it was sent by e-mail to some NGOs, but we don't know who was invited to comment. There were no measures to involve people experiencing poverty.

CZ: The Commission for social inclusion of Ministry of Labour and social affairs is responsible for producing the NAPSI report, involving people from public institutions – MOLSA, education, housing etc., universities, large NGOs or NGO networks (including EAPN), some representatives of associations of some groups (disabled), but not directly people experiencing poverty. This time, there was an initiation meeting (which is good – it was not last time) where priorities were set consensually, then some e-mail distribution of the NAPSI text but unfortunately that's it, no follow-up, probably due to time pressure, the text is very similar to last year's report.

DK: EAPN Denmark was involved from the start in providing input to the draft, stakeholder meeting arranged by the government and responding to the draft. The process has been better formally, but not much when it comes to impact.

FR: The Associations underline their strong support for the project to organise a ministerial communication on the NAP, the holding of a press conference of ministers in charge of the fight against poverty and social exclusion. They are also pleased with the plan to televise a debate without a vote in both parliamentary chambers. They have been asking for years that the NAP should be known and recognised. This is therefore a positive undertaking and they will follow this with great interest.

MA: In contrast to the previous NAPs on Poverty and Social Exclusion 2004/2006 & 2006-2008, this report involved much more participation of policy makers, service providers, service users and other stakeholders. It is encouraging to note that during the first period of consultation, i.e the preliminary consultation with service providers and users and other stakeholders particularly through the use of focus groups with people experiencing poverty. However, there was no clear explanation on how the data and results collected from the preliminary focus groups were analysed and how they are fed into the draft report, if any.

PO: The consultation process was quite good compared to the last NAP. Of course we didn't have a public discussion because the priorities are not new and innovating. There were 4 consultation meetings and in August the organizations could send their remarks to the Ministry. (They received 50). It's a pity that the Ministry was quite late and not a lot of organizations could take part in the consultation. But the Ministry was open and it was much better than last time”

Key shortcomings were still highlighted to be:

- **Insufficient time for adequate consultation** and input to drafts, particularly over the summer.
- **Inadequate access to the drafts – available on websites but not sent personally.**
- **Insufficient interest in developing participative democratic models** and more in keeping up the appearances of consultation – i.e. holding meetings when the document is already decided.
- **Lack of impact on the outcomes.** Even where groups could influence priorities and input to the first draft, few saw results in the final content.
- **Lack of feedback as to why proposals were accepted or not.**
- **Although improvements were seen in the involvement of NGO's often a limited group of NGO' are invited, some are excluded.**
- **Insufficient and inadequate involvement of people experiencing poverty** – insufficient consideration and resources are given to the methodology employed to ensure that people in poverty can participate equally in the meetings
- **The backward looking nature of the plan/report,** provides little motivation for stakeholder involvement and impact.

- **Lack of follow up and structured involvement in implementation/evaluation.**

However, it is important to underline that many of the organizations who have been involved in an on-going dialogue with the governments, within the NAP and in broader national policy discussions often may see a policy impact, in the longer-term, outside the timeline of the NAP draft.

FR: As every year the associations express a regret. For the associations, the drafting of the NAP should be the occasion for a reflection on the three years to come, and not just consist of a résumé of ministerial announcements which might impact on the following three years. For the associations, including a forecast in this document would allow a better mobilisation of all the parties involved in the drafting of this plan, which would then be more likely to attract the attention of the media. The associations therefore hope that in the future the draft NAPs will include a section called for example 'prospective', to include what could be the trains of thought for social policy over the next three years? Of course, as with all forecasts, this could not commit its protagonists but would give impetus to the document which otherwise seems turned towards the near past rather than the future.

PT: – The process was similar to last time. The participation of Civil Society was resumed in the National Forum of NGOs, but a more obvious and continuous participation of people experiencing poverty was not ensured. We want more structured and influential spaces for participation.

DE: The national report was built through consultation with the Government and the Lander. Social Partners and civil society are involved and a few representatives of people experiencing poverty. The process begins before the establishment of the report. But the consultation meeting on the first draft was so soon after the publishing of it, that it was hardly possible to read the draft.

HU: We have seen no significant improvement concerning civil society in the drafting or the content of the Strategic Report. The issue of the involvement and participation of people experiencing poverty, those primarily affected by anti-poverty policies, is completely lacking". The Document was prepared by the Committee against Social Exclusion with representatives of only 2 civil society organization (including EAPN HU), invited as permanent observers. In the drafting phase, the Committee met twice. A wide range of civil society organizations were completely excluded from the consultation and the draft available only online on the website. The network and the ministry held a joint conference in early September, although by that time, for practical purposes public debate was over. What is of more concern is that the Ministry failed to respond officially in any form to comments submitted, in writing.

*IE: The government produced a draft NRSPSI in August 2008 which was circulated to social partners who were given 2 weeks to comment. The Government and Minister stated that the consultation for the NAP Inclusion 2006-8 in 2005/early 2006 and recently on pension strategy was sufficient...**EAPN Ireland considers the process to be completely inadequate** and a major setback. EAPN Ireland lobbied the Government and Minister for a consultation process and put out a press statement. EAPN made a brief comment on the Draft Plan and will now carry out regional meetings and focus groups with People experiencing Poverty on the NAP Inclusion 2008-10 This will form the basis of a Shadow report...*

Capitalise on Good Examples

However, it is important to move forward positively on governance if the OMC is to have a chance of greater ownership and impact. This means that the NAP has to become a dynamic, stakeholder process. Governments and stakeholders need to be much more convinced of the real value-added of active and quality participation as part of an on-going structured dialogue with civil society, which can result not only in better ownership and credibility but better policies. **The OMC must do more to promote, exchange and capitalise on the strong examples of good practice.**

Some positive developments:

- **There is an increased activity of particularly NGO stakeholders:** a growing number of EAPN members have produced their own shadow reports (AU, CZ, IE, SE, POL, UK, MA). This is a strong sign of the interest in the NAP process by civil society stakeholders and its potential for assessing policy implementation gaps and developing proposals for new strategies, policies and measures.
- **New development in formalising the consultation process within the government structures (UK)**
- **Encouraging progress from New Member States.** (CZ, POL, MA, BU). It is important to recognize the democratic deficit that many eastern block member states are struggling to overcome. More recognition should be given to the specific obstacles they face. In this regard it is all the more encouraging to see the renewed commitment that some NMS are putting into improving stakeholder dialogues both in the NAP and national social inclusion policy development. In some cases, they are now outstripping older member states in their commitment to participation.
- **Good examples of new links with Regional and Local Action** planning processes (ES, BE, SE). Many Member States which are at the forefront of pressures for decentralization and regionalism are developing innovative processes on regional and local action planning. The NAP needs to ensure that these processes are structurally linked to the NAP process.
- **Specific involvement of people experiencing poverty**, but more work needed on methodology (MA, BE, UK, NO).
- **Increased visibility and links with national political process** – e.g. France and Belgium with televised debates in Parliament and press conferences.

Examples of EAPN involvement and impact.

In general, the extent and depth of EAPN involvement has strongly increased this year, as can be seen by the number of shadow reports produced by the networks, subject to national consultation with NGOs and people in poverty. Although some impact is noted, particularly on the governance process and on limited areas – e.g. on the priorities, or specific measures, in general the view is that it is little results for so much effort. This primarily related to the continuation of the NAP as a report, describing existing policies, rather than the development of a dynamic planning process. A major step forward is seen when NGOs have achieved the acceptance of their participation as part of a structured institutional dialogue process, which links national policy development and the NAP.

AU: EAPN was involved at all stages and had some success with the selection of themes, but in general input was little taken on board, given it was a report not a plan.

BE: EAPN Belgium was involved from the beginning and at all stages as a partner (see below). People in Poverty participate in the meetings on Group Actions, but it is not easy given the method followed in these meetings. Impact is difficult to see always, as we're very involved in the process – but we have played a key role in getting: access energy, low rental housing, social housing, free minimal electricity supply, compensation for loss of benefits for people on assistance accessing work.

BU: EAPN was actively involved in the consultation process that was developed, but highlights the limitation of a mainly paper exercise in commenting on the draft. They proposed the need for an initial meeting to pose the issues and the integration of national People experiencing Poverty meetings following the model developed in Ireland, Belgium, UK and other countries. They have highlighted the need to increase administrative capacity, including civil society structures and to strengthen active democracy, civil dialogue and involvement of people experiencing poverty.

CZ: EAPN is on the Commission on Social Inclusion and some members are regular members, so they agreed priorities and responded to the draft, They had hoped for a more thorough process (not just one meeting, and e-mail draft and no feedback). “We agreed on the top priorities, specific targets and some measures.

DK: EAPN is involved from the start in providing input to the draft, stakeholder meetings arranged by the Government and responding to the draft. The process was better formally, but not much when it came to impact. **The only example is the mention of the growing tendency to evict poor people from apartments.**

DE: EAPN is involved and the proposals were part of the stakeholders proposals, but the network wasn't clear on the impact, but were hopeful that influence was felt.

HU: EAPN is on the Committee against Social Exclusion as one of the civil society organizations, which met twice during the drafting phases and organized a joint conference with the Government in early September. However the debate was effectively over and the Ministry failed to respond to written comments. “We managed one change – the Ministry had forgotten to mention the importance of stakeholder's involvement in decision-making.

IE: No consultation was done this year apart from a rushed circulation of the draft to social partners in August, although usually EAPN has been a key partner to the process, particularly in facilitating input from people experiencing poverty. EAPN lobbied the Government and the Minister regarding the process and put out a press statement. It made a brief comment to the Draft plan in the time allowed. EAPN is carrying out regional meeting and focus groups with People in poverty on the NAP, which will form the basis of a shadow report.

MA: Different member organisations of EAPN were involved in the preliminary consultations and in the participation in focus groups organised for service users and providers. However, the NSR failed to acknowledge the EAPN report *Poverty and Inequality in Maltese Society? Excluded Groups in pursuit of social justice*”, which voiced the concerns of different vulnerable groups not considered in the ministry exercise: ex-convicts, homeless, lone mothers, third country national, low skilled people, lesbians and gays, transsexuals and bisexuals.

NO – The network has influence on the programmes that are launched through the NAP as we participate in hearings beforehand.

PL: EAPN was actively involved in the consultation process

PT: EAPN PT worked at 2 different but complementary levels. They were a major actor in the National NGO forum for the implementation of the NAP and also maintained good dialogue with the responsible people in the Ministry, based on previous NAP experience. EAPN PT, wrote a position paper on concerns and recommendations, held several meetings with the Portuguese National coordinator to discuss paper and with the National Coordination of the Portuguese NAP. They also participated in the Interministerial Commission for NAP. They reacted to the draft of the NAP and produced a final reaction paper. However, they are worried about the future with the end of the Interministerial Commission. “We question the kind of involvement and impact NGO's will achieve in the future”. The main impact was in the consolidation of the governance process. The main content impact was in the recognition of Ethnic Minorities as a priority – a direct consequence of the action of NGOs in the work of the NGO forum.

SE: EAPN took part in both information meetings as they have two representatives on the government's user delegation. EAPN sent in a written contribution and through the umbrella network (NMU – network against exclusion) which was attached as an annex. The Government has agreed to a follow meeting on implementation. Otherwise, little success as the “Government has very little interest in dialogue”

UK: EAPN is involved throughout the process, although this year there was some temporary deterioration due to loss of staff. There is a significant reference to the joint activities with DWP in Chapter 4, Better Governance, although these were all at the time on an informal and unresourced basis. (see below)

Key Examples of Structured Dialogue driven by the NAP Inclusion

The Social OMC and specifically the NAP Inclusion has helped to drive model practice in the development of structured dialogue between stakeholders, including People Experiencing Poverty and NGO's and Government. These models should form the basis of a specific study, exchange and peer review on structured stakeholder models, which can provide the basis for the development of concrete agreed guidelines for building effective participation. We present 2 key examples where NGO's working with people experiencing poverty have become an institutionalized partner to the social policy process.

Belgium: The process of the NAP has supported the evolution of a strong, on-going structured stakeholder exchange with Government on poverty and social inclusion policy. Civil Society Stakeholders and people experiencing poverty are now integral partners in the social policy cycle on poverty and exclusion, engaged in the design, delivery and evaluation stages. This year, for example the process of the preparation on the NAP was started in December 2007, driven by the Public Programming Service for Social Inclusion (SPP). All the relevant actors were invited, including people experiencing poverty, supported by the Belgian and Federal anti-poverty networks. Only the employers did not attend. The specific calendar for consultation for the NAP 2008-10 was developed (see annex) involving 9 key step/meetings over the year - starting from the evaluation of the previous NAP and its implementation, clarification of priorities, development of an initial draft, responses and discussion, development of second and third drafts to finalised report. The Belgian Anti-Poverty Network prepares together with the People experiencing poverty, prior to the meetings to support their engagement in the process. The priorities for the NAP are agreed by the stakeholder group. Funding is also provided to the anti-poverty network to support the participative dialogue process with people in poverty.

Spain: The participation process was better than in previous years and has now extended to developing a structured link between the development of local, regional action plans to the National Action plan process. EAPN has been a key partner to this process. All the activities including the role of EAPN are described as Good Practice in the NAP Inclusion in Annex V: relating to consultation and participation with NGO's in the preparation of the NAP At the joint seminar which was organized by the Ministry and EAPN In July, the main results of the assessment survey were presented and debated. The drafting of the NAP was influenced by some of these main suggestions and proposals.

UK: In the UK, civil society has been engaged in the NAP through the Social Policy Task Force (SPTF), which is chaired by EAPN. The SPTF has been a civil society dialogue partner on the NAP since 2001, which together with central, devolved and local government, and other civil society bodies and contributors, form part of the stakeholder Group on the NAP set up by the DWP in 2006. The Stakeholder group meets normally 4 times a year, and is consulted normally on the outline of the NAP, the first draft, the good practice examples, and then on the final report, follow up and implementation. Due to loss of key staff in February, the normal process saw a set back, with SPTF only seeing an outline (late) and no opportunity to comment on the draft. EAPN has raised its concerns about progress on staffing and output and sent a letter to the Director of the Division about UK government lack of representation at the Round Table. The scheduled June/ July 2008 NAP Stakeholder Group of civil servants from 22 government departments plus SPTF and some other NGO and local authority representatives was also cancelled. "We were not able to influence this decision despite DWP acknowledgement it was a step back. Therefore there was no formal cross government/ stakeholder discussion of draft NAP, this year. However, there have been some significant developments in

terms of the consolidation of the process overall. The Department of Work and Pensions have now proposed to include the Social Policy Task Force as official partners to the consultation process. This means we will form part of the institutionalized framework for consultation. However, our own SPTF activity was a step forward. Although we had not seen a draft government NAP, we prepared our own 'Shadow NAP' and submitted it to DWP on May 2. SPTF is a broader and stronger group than for the previous NAP. Also in terms of contributing grassroots voice to the NAP, the report of the first UK conference of people experiencing poverty (July 2007) was utilised in preparation of the NAP. This conference of 120 or so people, half grassroots and people who work with them and half civil servants from the different departments of government who are members of the stakeholder group, was established precisely to contribute to the NAP. In terms of contributing the local area voice, there was a step forward through the Bridging the Policy Gap project funded by the NAP Awareness 2 budget. This involved 4 local authorities in two day peer reviews of policies in one of each of the 4 UK government NAP objectives. The partners who participated in the peer reviews included DWP, 4 local authorities, the Scottish government, SPTF and grassroots people and policy officers from the local areas. The reports from this project were submitted for the NAP. A summary of the project is presented as an annex to the NAP (See www.povertyalliance.uk)