



POSITION PAPER

EAPN INPUT TO THE EC CONSULTATION FOR AN ACTION PLAN TO IMPLEMENT THE EUROPEAN PILLAR OF SOCIAL RIGHTS

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EAPN INPUT TO THE PUBLIC CONSULTATION FOR AN ACTION PLAN TO IMPLEMENT THE EUROPEAN PILLAR OF SOCIAL RIGHTS

1. INTRODUCTION

EAPN welcomed the adoption of the European Pillar of Social Rights (EPSR) by inter-institutional proclamation in November 2017, and the commitment demonstrated by the new European Commission leadership to ensure that the EPSR has real impact on social rights. On 14 January 2020 the Commission adopted a [Communication](#)¹ heralding the launch of a year-long [public consultation](#) as a basis for the launch of a concrete Action Plan at EU and national level in 2021.

However, 2020 has also been the year of COVID19, as the pandemic sweeps through Europe and the world with devastating impact. On May 5, over 3.5 million cases were confirmed worldwide with deaths approaching 250.000². The epidemic has immediate social and economic impacts beyond health and social care and **is hurting the poor and vulnerable most, increasing inequality and jeopardizing social rights.** (See [EAPN Statement](#) here [and letter](#) to the European Council).

Currently most Member States are providing immediate emergency support measures to reinforce lives and livelihoods. **It will be crucial that the Action Plan for the EPSR builds on these positive support measures to reinforce adequate income** (quality jobs with fair living wages and minimum income and social protection income support) and **access to key public and essential services** (public health and care services, education, training and lifelong learning and social, affordable housing). It must reject the failed solutions from 2008 - repaying the costs through austerity cuts which hit the poor hardest, rather than by increasing revenue through more progressive taxation. (See [EAPN Letter to Vice President Dombrovskis and Commissioner Schmit](#) on the CSRs 2020 – put social rights and poverty reduction at the heart of the recovery). EAPN is currently carrying out a study on the impact of COVID-19 and policy responses on people experiencing poverty and vulnerability.³

The social and economic impact of COVID-19 further underlines the **key role of the EU in guaranteeing social rights and the need for effective hard law as well as making the EU soft coordination mechanisms like the European Semester more coherent and effective, backed by EU funds.**

A key urgent need arising from COVID-19 impact will be to propose EU obligatory frameworks to guarantee adequate income – adequate income support/minimum income and fair wages and progress on legal guarantees to guarantee universal access to public and essential services.

In this document, EAPN sets out its proposals for an **Action Plan to implement the European Pillar of Social Rights**, as a part of its response to the European Commission's consultation. It builds on EAPN's policy position papers on the European Pillar of Social Rights (EPSR) developed together over this period with its national and European Organisation members: [Last Chance for Social Europe](#) (2016), Response to the EPSR: [Making Social Rights the beating heart of Europe](#) (2017); [Response to the Social Fairness Package: Making a difference to people in poverty](#) (2018), as well as EAPN monitoring reports

¹ EC Communication: A strong social Europe for Just Transitions (14 January 2020)

² John Hopkins University Data.

³ The Study will be launched in EAPN's policy conference on the 14 July.

on the implementation on poverty, social rights and participation through the European Semester⁴ and specific thematic reports. This paper strongly builds on our [Position Paper for Delivering Agenda 2030 for people and planet: EAPN proposals for a Post Europe 2020 strategy](#).

We underline the need to ensure that **emergency measures being put in place by Member States to deal with COVID-19 must be supported to reinforce health, public services and social protection systems as pre-requisites** to effectively protect the poor and vulnerable, reduce inequalities and provide automatic stabilisers which mitigate the worst impacts and protect against future epidemics.

A further vital source for EAPN is the **direct voice of people experiencing poverty**, captured in the reports of the EU People Experiencing Poverty Meetings,⁵ co-organized with the European Commission and the Presidencies since 2001. This input sets out **EAPN's proposals for EU level action**, developed together with EAPN's EU-wide Policy Expert group: the EU Inclusion Strategies Group, (EUISG).

2. EXECUTIVE SUMMARY

EAPN calls for a high-profile EPSR Action Plan proposing soft and hard law measures, with a clear timetable at EU and national level, mapping progress towards obligatory social rights that guarantee basic living standards for all EU residents. The Action Plan should be launched at the planned Social Summit in Portugal in 2021 and should include an EU strategy to fight poverty as the overarching goal and framework for the Action Plan with an ambitious poverty target.

Pre-conditions for a successful Action Plan:

1. The EU must support **short-term responses to COVID-19 and ensure they prevent increases and lead to long-term reductions** in poverty and inequality.
2. **The strategy must be set within a [coherent post 2020/Europe 2030 strategy](#)**⁶ and a Social and Green Deal underpinning the exit strategies from COVID-19.
3. **An EU integrated strategy to fight poverty must form the overarching goal and framework for the Action Plan.** This should be based on Active Inclusion refocused to guarantee rights to adequate income (through quality jobs and/or income support) and quality essential services for all groups.
4. **This strategy must adopt an ambitious EU target** to end poverty in all its forms (SDG1), through a 50% target (AROPE) and an additional indicator/target to cover extreme poverty including a concrete measurement of homelessness, based on the [ETHOS](#)⁷ framework.

⁴ See EAPN Positions on European Semester (2010-2020), eg Is the 2019 European Semester more Social? – EAPN Assessment of the European Semester 2019 (September 2019).

⁵ [EU Meetings of People Experiencing Poverty \(2011-2019\)](#)

⁶ EAPN (2019): Delivering Agenda 2030 for people and planet: EAPN Proposals for a post 2020 strategy.

⁷ See FEANTSA: www.feantsa.org; from rough sleeping to those in emergency accommodation, overcrowded housing, “hidden homelessness” etc.

5. **The EU needs obligatory Social Rights!** A starting point must be guaranteeing an [adequate income](#)⁸ for all in the EU. An EU framework Directive to [guarantee adequate minimum income](#) (adequate, accessible and enabling) and an EU framework for minimum/living wages is a priority, particularly Post COVID-19.
6. **EU soft instruments must be ‘Social-Rights-and-poverty-proofed’:** ‘socialising the European Semester’ and effectively mobilising EU funds to support social rights that reduce poverty linked to the Semester.
7. **People must be put at the heart** – empowering people to contribute to solutions, holding governments to account – with obligatory guidelines in the European Semester, in other EU and national decision-making processes

EAPN highlights 5 Key EPSR principals as priorities, grouped with other relevant principles and underpinned by the SDGs, to be implemented through EU hard law and soft instruments. EAPN’s overriding priority, particularly in the light of the impact of COVID-19 impact is the right to an **adequate income (minimum income/social protection and minimum/living wage) and access to universal public and essential services** – including housing, health, care, child care/early learning, energy as the basis for an effective antipoverty strategy.

Summary of proposals to implement EAPN 5 Key Principals

Principle 14: Minimum Income. SDG 1.

Key hard law priority is an EU Framework Directive (legal base: TFEU (art 153,1,h) to guarantee an adequate, accessible and enabling Minimum Income, based on common definitions including adequacy linked to the 60% AROP poverty threshold and underpinned by national reference budgets.

Soft Instruments: MI must be a key element of an integrated antipoverty strategy, based on Active Inclusion and supported through the European Semester with increased CSRs as a trigger for policy actions and sanctions where there are inadequate levels or progress on adequacy, coverage and enabling support. Further work is needed on - agreeing common definitions of all elements, new research on transitions, take-up and negative impacts of conditionality. A requirement to increase financing of MI schemes through increased and more progressive tax collection, with targeted support from EU funds backing effective national systems is key.

Principle 12: Social Protection. SDG 1 and 10

Hard Law: EAPN strongly backs the need for a Framework Directive to guarantee access to social protection. We support the ETUC⁹ view that an impact assessment should be carried out in 4 years’ time, involving the social partners, as well as civil society organizations particularly those working with low-paid and vulnerable workers to ascertain whether a further legal instrument is needed. The social and economic impact of COVID-19 only underlines the urgent need to guarantee social protection to all regardless of employment status.

⁸ EAPN (2020): Position Paper on Adequate Income.

⁹ ETUC Position Paper for the Action Plan for the EPSR which has been adopted in October 2019.

Soft Instruments: *The Council Recommendation on Access to Social Protection needs to be implemented prioritizing the extension of mandatory and effective coverage, adequate of benefits for all workers, regardless of employment status. This must be monitored rigorously through the European Semester, including coherence with macroeconomic CSRs, increased support for adequacy of financing of social protection - at least at 35% of GDP, financed through better and more progressive tax collection.*

[Principle 6: Fair Wages, connected to Principles 3, 4, 5 and 8 - SDG 8.](#)

Hard law: *Propose an EU obligatory framework establishing minimum living wages, which allows for a decent standard of living for workers and their families, benchmarked at 60% of median wage contextualized with reference budgets. Require statutory minimum wages, where none exist and support collective bargaining as a pre-requisite. Support an EU Directive on gender pay gap and to require pay transparency.*

Soft Instruments: *Prioritize quality employment principles and indicators to capture adequacy of wages, benchmarked to the 60% of median wage. Through the European Semester adopt a fair-wage/decent work priority for CSRs including: increased analysis of in-work poverty related to gender and other groups, supporting increased employment security/employment status for all workers, collective bargaining and trade union membership and person-centred supportive active inclusion. Improve consultation with people facing in-work poverty and NGOs supporting them in policy dialogue processes.*

[See also EAPN's Position Paper on Adequate Income.](#)

[Principle 20: Access to Essential Services, connected to Principles 19, 16, 18, 11 – SDG 1,3,6,7,10,11.](#)

Hard Law: *EAPN continues to support the need for an **EU Directive to protect universal public services, as a public good**, to avoid an increasingly marketized, profit-driven model. The absence of any obligatory **right to housing** is a major weakness in the EU social model. The right to housing should be enforced regardless of residence status, to ensure access to rights for migrants, homeless people and other excluded.*

Soft Instruments: *the European Semester needs to be rebalanced towards ensuring universal access to accessible, affordable, quality services in all areas, rather than viewed predominantly as a cost and a target for restructuring.*

*In the area of **Energy Poverty**: The European Green Deal/ Just Transition must assert the right to affordable, clean energy for all and develop obligatory EU guidelines to ensure rights based approaches in the national climate and energy plans based on the 3 pillar approach (adequate income, reducing consumption/energy efficiency and fair prices). Further EU action is needed to ban disconnections, stop the phasing out of regulated prices in the energy sector for domestic households, support social tariffs for vulnerable customers, prioritising EU Invest financing to support energy efficiency and decent housing, including expansion of social housing measures targeting low income households ensuring no additional costs in housing or bills.*

Housing: The European Semester should ensure that the Country-Specific Recommendations (CSRs) treat housing as a social right, rather than primarily as a market for growth. It must address speculation and support the increase of adequate and affordable housing for low income groups, including through significant investment in social housing. EU funds including ESF, ERDF and EU Invest should support the growth of new housing provision including local/regional social housing cooperatives owned by people themselves. The EU should support regulation of rents particularly where there is evidence of market failure. Strong backing must be given to the prevention of evictions, the promotion of national cross-sectoral strategies to tackle homelessness¹⁰, investing in Housing First strategies and ensuring a stop to criminalisation of the homeless. Progress should be made on a common EU definition and indicator for 'affordable' housing costs of 25% of personal budgets, underpinned by EU minimum quality standards on housing. A concrete EU indicator is needed to measure homelessness, covering the widest scope of homelessness defined by the [ETHOS](#)¹¹ framework. The participation of people facing homelessness and housing exclusion is crucial to achieve viable policy solutions in national and EU decision-making processes, together with the NGOs that support them.

Health and Care: The current distinction between health and care services is problematic, as underlined by the COVID-19 epidemic. The EU should create an adequate framework to guarantee the right to universal, affordable, quality health and social care services for all, covering all essential health and care services (including prevention, primary, community, hospital and specialist care, dental, mental health, social and long-term care and the cost of medicines). The Semester should give specific priority to defending universal provision as a public good and ensuring equal access for all groups/also rural/city divide. An independent assessment should be carried out of the impact of privatisation and liberalisation and recommendations made to support the financing of universal public systems through either progressive tax systems or national health insurance schemes where all pay into the system according to their means, supported by EU macroeconomic policy, rather than a focus on cost-saving efficiencies. EU mobility and transferability of rights for affordable health services must be clarified and monitoring improved of national legal frameworks and obligations, including commitments to universality, non-discrimination, reimbursement of costs, waiting lists etc. Poverty and social exclusion must be recognized as major social determinants of health inequality which leads to long-term social and economic costs. A full study must be made of COVID-19 impact in relation to health inequalities and access to health and care services, to assess the key factors and links to social determinants, including poverty. Recommendations must be made to support investment to ensure universal coverage of health and care services, as well as targeted action to compensate for inequalities for specific groups. The users (patients, people facing poverty and social exclusion and those currently unable to access health services) must be made key actors in the design, monitoring and support in delivery, particularly through the European Semester.

¹⁰ FEANTSA www.feantsa.org

¹¹ See FEANTSA: www.feantsa.org; from rough sleeping to those in emergency accommodation, overcrowded housing, "hidden homelessness" etc.

Child poverty: As partners to the [Investing in Children Alliance joint statement](#)¹², EAPN supports the implementation of the Child Guarantee, with a Council Recommendation, reinforcing the Investing in Children Commission Recommendation (2013), recognizing the multidimensionality of poverty and framing the Recommendation within an integrated antipoverty approach tackling the needs of children and their carers/parents: 1) Access to adequate resources and benefits. 2) Access to affordable, quality and inclusive services, 3) Children's right to participate in cultural and recreational activities and in decisions made for their lives). Ensuring that the Council Recommendation has a clear implementation plan to ensure effective monitoring and is properly financed and interconnected to other EU financial instruments beyond ESF+.

[Principle 1: Education, Training and Life-long learning- SDG 4.](#)

Soft Instruments: The right to universal, quality and affordable education, VET and LLL throughout the life course, must be systematically implemented in the European Semester, prioritising CSRs for those MS which have made low progress or have major problems with ensuring equal treatment for poor, or excluded groups. Dedicated funding to support investments in more inclusive education systems, informal and non-formal education in particular for NEETs and adult learners, accessibility, awareness raising and anti-discrimination measures must be included in the Multi-Annual Financial Framework (MFF) and more specifically in the ESF+. Introduce socio-economic background as grounds for discrimination with disaggregated data. Redefine higher targets for early school leavers and NEETs, including quality of support and ensure adequate investment to meet the needs of those requiring support with basic literacy and numeracy. Update an EU-wide inventory of existing systems and procedures to validate non-formal education, training and life skills as the basis to elaborate recommendations to EU MS with non-existing or underdeveloped validation systems, including action on non-formal education in the EEA. Better target EU funds to support lifelong learning from a broader perspective than labour market needs, for example through implementing enabling conditionalities in the European Social Fund/ESF+ prioritizing funding aimed at those with the lowest level of educational attainment, in adult literacy, as well as those from low income families or suffering from discrimination. Expand use of EU funding from ESF+ to co-finance language and integration courses for migrant workers, refugees and asylum seekers and support measures for the educational attainment and social inclusion of Roma children and to overcome segregation and discrimination. Ensure the active participation of children, youth and adults in educational systems and services as well as in dialogue processes to develop and monitor educational and training policies.

¹² Investing in Children Alliance Joint Statement proposals for a Council Recommendation on the Child Guarantee for the well-being for all children across the EU.

3. OVERARCHING EU PRE-REQUISITES – DETAILED PROPOSALS

3.1 Support short-term responses to COVID-19 and ensure they lead to long-term reductions in poverty and inequality

- Carry out a **poverty/social impact assessment** to ascertain which groups are hardest hit, and provide effective immediate and long-term support; prioritize investment in welfare states (universal public health and social care systems, adequate minimum income and social protection), quality jobs and essential services with access to affordable social housing! (See [EAPN Letter to Vice President Dombrovskis here.](#)) The avoidance of the mistakes of the 2008 crisis imposing austerity measures must be explicitly backed, if poverty and inequality are not to be drastically increased.

3.2 Promote a coherent Europe 2030 Strategy – a Social and Green Deal!

- EAPN strongly backs the implementation of the European Pillar of Social Rights, but underlines that an effective implementation will depend upon the coherence of its role within the overarching strategies and approach being developed by the EU.
- In 2019, the ‘European Green Deal’ was announced by President Von der Leyen, as the new Growth Strategy¹³. Whilst welcoming the commitment to swift action on climate change, there is a need for more than ‘*just transition*’, primarily targeted at regions converting from fossil-fuels, by embedding a *Just Transition principle* that ensures that the poor don’t pay for regressive effects of transition and positively benefit.
- The **Green Deal itself must also be a Social Deal** framed within an overarching balanced economic, environmental and social sustainability project, building on the Europe 2020 strategy, where macroeconomic policy explicitly supports and invests in social protection and social rights underpinned by effective ex-ante social/poverty impact assessment.
- The **impact of COVID-19 only further strengthens the call for a coherent, overarching social and sustainable EU 2030 strategy**. Whilst the EU Exit Strategy must be used to support transition this must be balanced with effective social investment in welfare states and social rights if inequalities are to be reduced and an inclusive, social as well as a green recovery achieved. A 10-year coherent, social and sustainable development strategy must aim to end poverty and social exclusion, underpinned by the SDGs and EPSR. The European Green Deal and the EPSR would be equal pillars within this overarching approach. (See [EAPN Position: Delivering Agenda 2030 for People and Planet \(EAPN proposals for a Post Europe 2020 strategy\)](#))
- Neither is it possible to design an Action Plan for social rights, without clear reference to the **appropriate macroeconomic policies to help implement those rights**. The negative legacy of the EU’s priority on fiscal consolidation, austerity, liberalisation and privatisation of public services particularly during the crisis, continues to threaten social rights. This is particularly pertinent in

the Exit Strategy post COVID-19. A transparent social/distributional impact assessment needs to be developed on all policies.

- Require **support of a golden rule¹⁴ to support investment in public infrastructure** essential for social rights, including social protection¹⁵, in order to ensure real progress on reducing poverty and inequality. A key indicator/target for increasing public spending in relation to GDP on funding of welfare states, and increasing progressive taxation is crucial.

3.3 Adopt an EU integrated strategy to fight poverty as the framework for social rights

- Whilst the 20 Social Rights in the EPSR are highly relevant to the fight against poverty, a focus on gradual implementation of individual rights alone will not deliver tangible results on poverty. The implementation of social rights needs to be coordinated in a **multidimensional strategy**, linking the different individual rights, with the overarching goal to eradicate poverty, reduce inequality and promote well-being. The importance of this focus is only underlined with the social and economic impact of COVID-19.
- EAPN strongly **welcomes the increased focus on poverty reduction** in the Commission's recent Communication¹⁶ on the EPSR, highlighting the need to support a life in dignity by "*getting the support needed to look for a job, being able to access affordable and quality health care, decent opportunities for education and training, affordable housing and affordable access to essential goods and services, including water, energy, transport and digital communications. For those out of the labour market, minimum income schemes, accompanied by enabling services, offer a last resort which should ensure a life in dignity*", as well as support on housing, energy poverty, for children and Roma. Commissioner Schmit has made clear his support for an EU anti-poverty strategy in the EP hearings and consequent events.
- For this reason, EAPN it is clear that the **opening premise and goal** of the Action Plan should be the commitment to **End Poverty in all its forms** (SDG 1), building on the Europe 2020 goal for a new ambitious Poverty Target post 2020, and to a **rights-based, person-centred integrated strategy to fight poverty and exclusion, for all groups, through the life course**. The action plan proposals for each individual social right/principle should then indicate how they individually and collectively contribute to this goal and strategy, in a coherent, integrated form.
- For EAPN this anti-poverty strategy needs to learn the lessons of COVID-19 social impact:
 - **Build on the 3-pillared Active Inclusion approach** recommended in the Commission Recommendation on '[Active Inclusion of people excluded from the labour market](#)', but not only as a means to get people into any job and as the 'only route out of poverty' (when in-work poverty continues to rise to currently 9.6% - data for 2018), but rooted in the principle of guaranteeing all people, regardless of age and situation, access to rights, resources and services and support for social inclusion and participation in society.

¹⁴ ETUI (2015) Golden Rule of Public Investment.

¹⁵ EAPN (2019) Financing Social Protection Reflection Paper.

¹⁶ EC Communication: Social Europe for a Just Transition (14 January 2020)

- **Put first the right to adequate income and access to universal services:**
 - 1) **Quality jobs and fair wages**
 - 2) **Adequate Minimum Income** for those who cannot work or access decent jobs: minimum income and social protection and
 - 3) **Quality universal services.** This means not just services to ‘get people into work’, but ones that support a dignified life through their life course: universal health and social care/ education, training and lifelong learning/affordable, quality housing/ childcare and early learning/ affordable energy/water and transport, underpinned by the EPSR and SDGs.

- **Be comprehensive and integrated**, providing joined-up personalised services, including through a case-management approach that responds to the challenges facing each person in gaining their rights to services, quality work and income support in a comprehensive manner.

- **Put people at the centre at all stages of their lives, both as children and adults** – firstly by empowering them and supporting their participation in the design and ownership of their own inclusion pathway. Secondly, collectively as beneficiaries and essential voices in the design, delivery and monitoring of the services and policies that inform them.

- **Support additional tailored strategies for key target groups, tackling discrimination including socio-economic**, within the overarching umbrella of an integrated EU anti-poverty strategy:
 - 1) particularly a **Child Guarantee**, rooted in the comprehensive 3-pillar approach of the [Investing in Children Recommendation](#), supporting a Council Recommendation to ensure its implementation.
 - 2) tackling homelessness and housing exclusion – supporting a framework for national strategies.
 - 3) targeted strategies for older people, people with disabilities, migrants, Roma and other black and ethnic minorities.

- **Poverty is linked to growing inequality. Any antipoverty strategy must be underpinned by strong redistribution mechanisms** to challenge the unequal distribution of income and wealth. **Tax justice** is an essential instrument for redistribution, and to finance sustainable finance welfare states. This should include: increasing tax collection, tackling tax evasion and avoidance, increasing the progressivity of tax systems – income, corporation, wealth, property and inheritance taxes, avoiding regressive VAT and consumer taxes and mitigating against the potentially regressive impact of environmental taxes, investing in new sources of taxation including a digital tax and effective Financial Transactions Tax.

3.4 Adopt an ambitious EU 2030 poverty target to support upward convergence!

- The **EPSR aims to provide an essential floor for social rights** in the EU. This is an essential balance to the Stability and Growth Pact. All policies should contribute to the implementation.
- The **goal to drive economic and social upward convergence** is currently carried out through EU coordination mechanism: the European Semester, primarily through the Social Scoreboard. The focus on EU averages in the Scoreboard, however, is not sufficient to drive positive progress i.e. upward convergence, particularly in areas where the EU average itself is low. **There is a clear need for ambitious EU targets** and common goals that can drive this vision – i.e. concrete poverty and inequality reduction targets.
- Although the **Europe 2020 poverty target to reduce poverty by at least 20 million fell short, it was crucial in setting a common political ambition** as well as driving funding in line and support of this target (i.e. the 20% ESF earmarking and Horizon 2020). However, the target was flawed, as it did not refer to a common %, unlike other Social targets. Member States were also left to set their own targets based on their own choice of indicators (e.g. in Germany and Sweden).
- For this reason, EAPN would support the **SDG 1 target, and propose an ambitious EU target to reduce at risk of poverty and social exclusion (AROPE) by 50%**, aiming for a progressive realisation, with a mid-term 5 year review and an action plan, developed and monitored with stakeholders at national and European level through the European Semester.
- This should be combined with an **additional target to eradicate extreme poverty**, again in line with SDG 1. Robust indicators need to be developed for this area, which can build on the new social and material deprivation indicator developed through the Indicators Sub-Group. They should include a concrete measurement of homelessness, covering the widest measure of homelessness covered by the [ETHOS](#)¹⁷ framework. Indicators and a target for extreme poverty should be additional to the AROPE indicators/target. It is essential to monitor the multi-dimensional phenomenon of poverty in ‘all its forms’. EAPN strongly defends the relative poverty indicator, as well as more absolute indicators, to capture people’s ability to participate on equal terms in each Member State.

¹⁷ See FEANTSA: www.feantsa.org, from rough sleeping to those in emergency accommodation, overcrowded housing, “hidden homelessness” etc.

3.5 Propose EU Legislation to enforce Social Rights for all!

- Valuable as the EPSR is, it is currently **only a framework of principles rather than enforceable rights**. The current ‘soft mechanisms’ have clearly fallen short of delivering substantial results on poverty, with still 109 million (2018) at risk of poverty and exclusion¹⁸ and growing gaps across Member States and between key groups, with higher risk faced by children, single parents, people with disabilities, unemployed persons, Travellers and Roma, migrants and the homeless.
- A clear goal should be to progress towards an **enforceable framework of rights** if implementation is to be effective. In the long-term this may require Treaty changes. However, progress can already be made within existing Treaty obligations, if the EU has sufficient political will.
- Whilst social policy is considered mainly within national competence, the **EU has a role in Article 3.5 L(TFU), to contribute to eradicating poverty, observe human rights** and respect the [charter of the United Nations](#)". Progress on enforceable social rights has been recently made with the adoption of the [Directive on Work-Life Balance in 2019](#) and with the current EC social partner consultation regarding an EU framework on fair minimum wages, as well as the Green Paper on Ageing and the update of the Youth Guarantee.
- The **Action Plan for the implementation of the EPSR, should set out a dynamic roadmap of desirable areas for ‘hard law’**, quoting the relevant legal base that could be crucial in defending basic social rights and standards, and then setting out what is needed to achieve these measures - with the involvement of Parliament, the Council, the Advisory bodies, national and EU civil society and social partners stakeholders - to achieve their progressive adoption, during the coming decade.
- For EAPN and its members – an **EU framework Directive on Minimum Income and EU framework on fair wages/minimum-living wage** is an essential first step to guarantee adequate income.

¹⁸ This means the Europe 2020 poverty reduction target (20 mio.) is missed by about 14 mio. as of end of 2018.

3.6 Improve monitoring and implementation of rights through EU soft instruments

Recognising that competence for implementation lies mainly with Member States, the main soft policy EU instruments to monitor the delivery on the EPSR will be the European Semester and EU funds. Both these will need to work effectively in tandem as key elements and this needs to be clearly spelled out and well anchored in the Action Plan.

3.6.1 Socialising the European Semester

- Although **progress has been made on integrating the EPSR**, with the renamed ASGS (Annual Sustainable Growth Strategy), the **dominant focus continues to be on promoting macroeconomic goals of Stability and now Green Growth**, with a threat of continued focus on cost-cutting/restructuring of public services, particularly health and social protection once the COVID-19 crisis is on the wane, in the search to recoup public deficits and debt.
- The **focus on social rights and the EPSR is very limited in the Country Reports 2020**. Only a page or so is dedicated to this, compared to over 50 pages on macroeconomic and environmental issues and priorities. Although mentioned within the chapter on employment, education and social policies, there is no detailed analysis of all the principles, only of the social scoreboard, which does not cover all principles. The SDGs are monitored in the annex, but they are not consistently mainstreamed in the ASGS. Poverty is not now consistently a focus, with the ending of Europe 2020 and the poverty reduction target. There is an overall lack of analysis of the effectiveness of the policies and proposals for solutions.
- The introduction of a **new Environmental Sustainability chapter** focussed on just transition, whilst welcome, worryingly seems to displace the focus on delivery on social rights, for example in the Annex D of the Country Reports (now focusing on priority investment areas and framework conditions for effective delivery of the Just Transition Fund) in the period 2021 to 2027, rather than combining a focus on environmental protection/just transition and social rights.
- A **clearer road map, with a transparent monitoring grid** (i.e. Revised Joint Assessment Frame), needs to be launched, which monitors all 20 EPSR principles consistently, not only the indicators in the Social Scoreboard, ensuring that **section on social rights is dealt with on an equal footing** to the economic and now environmental objectives (i.e. with equal length chapters in the Country Reports and NRPs, linked to the SDGs) showing their contribution to the main social scoreboard indicators - i.e. particularly the reduction of poverty and inequality, for key age and target groups.
- However, a clear focus should be given to the EU rather than the global indicators as the latter will tend to underplay the real impact of poverty and risk of poverty in most Member States.

- The **revised Semester should ensure at least 1 social rights CSR**, (not just social)¹⁹ for each country, underpinned by a full analysis of all social rights, key trends and the situation for poverty and social exclusion in the Country Reports and the NRPs. A clear link should be made with the voluntary reporting mechanisms for the SDGs.
- The **meaningful participation of civil society organisations** and people directly facing poverty must be actively promoted, and on equal terms to social partners and other stakeholders within the European Semester. Their role is key in keeping up pressure on governments to deliver on social rights at the national and EU level. This requires **obligatory guidelines, transparent and adequate funding, monitoring and mutual learning** through the European Semester.

3.6.2 Mobilize EU funds and link to the Semester

- Important steps have been taken to try to ensure that [EU funds in the Multi Financial Framework \(MFF\) 2021-2027](#) are **mobilised more effectively in support of the EPSR**, and deliver on poverty and social exclusion: with the new priority 4: “A more social Europe implementing the Pillar of Social Rights” and the specific objective of *people at the risk of poverty, including most deprived and children*, underpinned by strengthened, obligatory *enabling conditions*, to ensure effective delivery of National strategic policy framework for social inclusion and poverty reduction.
- However, the overall budget for the MFF and particularly Cohesion Funds are facing grave threats. Even if the full amount is agreed, the **funding of 25%, including FEAD funds, is not sufficiently ambitious**. There needs to be clear guidance to ensure that such integrated strategies go beyond narrow active labour market measures, avoid conditionality, and effectively support inclusion for key target groups. This means co-development together with community organisations/NGOs, and strict enforcement of the enabling conditions ensuring meaningful engagement of civil society organisations in the monitoring committees under the Code of Conduct on Partnership on ESF.
- The stronger connection to the European Semester, both in requiring delivery on the CSRs and monitoring investment to the objectives in Annex D, are useful. However, the **CSRs must prioritise social rights, and not just ‘social issues’**, where the main focus is often ‘restructuring/reducing’ the funding for social provisions (particularly health/care/pensions/social protection) which undermine social rights. Annex D needs to include a strong focus on the delivery of the 4th Priority on the Social Pillar, the specific priority, ie *people at the risk of poverty, including most deprived and children*, and the enabling condition on antipoverty strategies, not as at the moment only on green investment.
- Steps need to be taken to ensure that **ESF is not instrumentalised by national governments** to finance mainstream public programmes and implement effective sanctions when EU funds are misused.

¹⁹ In EAPN’s analysis of the CSRs, CSRS are called ‘social’ when they are related to ‘social issues’, but do not always support social rights, indeed they can often be seen to undermine them e.g. in the focus on cost effectiveness/efficiencies in health services, social protection. See EAPN [2019 CSR Assessment](#).

- It will be crucial to pro-actively support **innovative, grass-roots community/NGO projects** with upfront funding, global grants, avoiding the 20% co-financing requirement.

3.7 Put people at the heart – empowering people to contribute to solutions, holding governments to account

- The **role of civil society organisations is still regrettably weak and insufficiently clear in the delivery of the EPSR**, nor is there sufficient implementation of existing requirements in the main coordination mechanisms e.g. the Semester and EU funds. Whilst Civil Society Organisations are highlighted in the Commission’s recent Communication, and within the European Semester (Recital 11 of the revised Employment Guidelines (2018)), in reality NGOs struggle to be engaged consistently and meaningfully at all stages of the European Semester process and to achieve impact. Big disparities in relation to engagement of CSOs exist between Member States, the different DGs and the Commission Representations at national level, i.e. the European Semester Officers.²⁰
- Whilst **major efforts have been made by DG Employment to engage NGOs** in regular dialogue, this has not translated into engagement by sufficient MS, neither is such guidance apparent in the Economic Guidelines, despite the crucial role macroeconomic policy plays in the fight against poverty: supporting investment in public services, social protection and social rights.
- **Civil Society Organisations should be put on a par with social partners**, at all stages of the consultation process: at EU, national and regional level. This means:
 - 1) changes to the economic guidelines and stricter implementation of the employment guidelines, with obligatory guidelines,
 - 2) a practical handbook
 - 3) effective monitoring through the Semester, including quality standards/benchmarks/peer review for quality engagement.
 - 4) The direct voice of people experiencing poverty and social exclusion is crucial. The Commission must build on the current annual [EU meetings of people experiencing poverty](#), to mainstream them directly into the policy-making processes, as a crucial voice contributing to meaningful solutions.
- **Financial support should be made available to civil society organizations**, on an equal basis as to social partners, to provide timely information and build their capacity to engage meaningfully in these processes. Specific support should be given to facilitate the direct engagement of people experiencing poverty and social exclusion at national level, to provide feedback on policy proposals, the effectiveness of implementation as well as crucial input on policy design. This also helps to ensure accountability, monitor delivery on social rights and poverty reduction, contributing pro-actively to sustainable solutions and implementation.

²⁰ EAPN 2010: Is the European Semester 2019 more social: EAPN Assessment of the 2019 European Semester.

4. SPECIFIC RECOMMENDATIONS ON KEY EPSR PRINCIPLES

PRINCIPLE 14: MINIMUM INCOME

Goal 1: SDGs – End Poverty in all its forms – “affirms that all people, everywhere, should **enjoy a basic standard of living**. This includes **social protection benefits** for the poor and most vulnerable”.

EAPN has campaigned on the right to an adequate minimum income since 2000, most recently through coordinating the European Minimum Network Project²¹ based on the following definition: “Minimum income schemes are income support schemes which provide a safety net for those who cannot work or access a decent job and are not eligible for social insurance payments or those whose entitlements to these have expired. They are last resort schemes which are intended to ensure a minimum standard of living for individuals and their dependents when they have no other means of financial support”.

As such, **adequate minimum income schemes are a priority instrument to prevent and tackle poverty** for all groups. They are a key social right and are good for people who need them and for the whole society. They allow people to live in dignity and ensure they can remain active in society, helping them reconnect to the world of work. They also set minimum floor for income level and help to ensure decent wages. Adequate Minimum Income is indispensable for more equal societies and to ensure social cohesion, which is beneficial for the whole of society. They are also good for the economy: providing a high return on investment and work as automatic stabilizers.

To be effective, they need to be designed on the basis of **three key criteria**:

- 1) **Adequate**: a level of income that is indispensable to live a life in dignity and to fully participate in society.
- 2) **Accessible**: providing comprehensive coverage for all people who need the schemes for as long as they need the support.
- 3) **Enabling**: schemes that promote people's empowerment and participation in society and facilitate their access to quality services and inclusive labour markets.

However, according to the Commission's own yearly assessments²², although all MS now have MIS of some type, they still fall **far short in terms of adequacy, coverage and providing positive, enabling support for beneficiaries**. Only 2 countries have MI levels near the poverty threshold: NL and IE and this not for all groups. However, EAPN IE points out that the Reference Budgets developed by the [Vincentian Partnership for Social Justice](#)²³ show that the MI levels fall far short of adequacy for real household needs, based on a real basket of goods and services. In BG, RO, LT, HU, EL, PT and SK, the MI is below 40% for a single person²⁴. Narrowing of eligibility criteria, and major problems of low take

²¹ The European Minimum Income Network (EMIN) is an informal Network of organisations and individuals committed to achieve the progressive realisation of the right to adequate, accessible and enabling Minimum Income Schemes. The organisations involved include the relevant public authorities, service providers, social partners, academics, policy makers at different levels, NGOs, and fosters the involvement of people who benefit or could benefit from minimum income support. EMIN 1 and 2 received financial support from the EaSI programme from 2013-2018. See www.eminet.eu

²² EC Joint Employment Report 2020 (December 2019)

²³ www.budgeting.ie. Update report 2019

²⁴ EMIN2 Final Report, December 2018

up (between 20-70%²⁵) is undermining rights. The requirement in the EPSR, that ‘minimum income benefits’ should be combined with incentives to (re)integrate into the labour market’ has too often been interpreted as punitive conditionality, with threats of sanctions and even withdrawal of benefits, attacking rights, increasing hardship and undermining the link with the labour market.

EAPN’s key demand is for the EU to adopt a Framework Directive on Adequate Minimum Income. Such an instrument is essential to translate the right to an adequate minimum income for all, over the life-course, into a legally binding commitment for all EU MS.

EAPN believes that an **adequate guaranteed minimum income is a social and human right for all people throughout their entire lives**. This should be achieved by:

- Ensuring that **minimum income schemes take people out of poverty and above the 60% median disposable household income poverty threshold (AROP), underpinned by national reference budgets**. These schemes capture the real costs of essential goods and services and contextualise the EU-level AROP threshold by a reflecting the living standard which can be afforded in a country with an income corresponding to this threshold and the real price levels for the goods and services taken into account.
- **Providing comprehensive coverage and seamless transitions to other benefits** at all stages.
- **Supporting person-centred, integrated support as part of an “active inclusion approach”** which is based on case-management approaches and personalised planning.
- **Ensuring access to other key social rights for minimum income beneficiaries**, e.g. decent housing, education, affordable health, and not just as a “condition” or an “instrument” to get them into work. **For EAPN, EU social standards must be rights, should never be conditional or treated as a disincentive to work**. Conditionality of this type is a contradiction to the rights-based approach that the EU has signed up to.
- **Offering a positive hierarchy to minimum wages**, in order to provide positive incentives to work. This also means minimum income should be set higher than minimum wage, rather than reducing minimum income.

To make progress at EU level, EAPN proposes both soft and hard law actions outlined below. For a more detailed updated discussion please see [EAPN’s Position Paper on adequate income](#) (May 2020)²⁶.

Soft instruments to support upward convergence

The right to minimum income should continue to be strengthened through the European Semester and EU funds:

- MS should be required to **ensure minimum income to be adequate, accessible, and enabling**. Progress on all these elements should be monitored with CSRs in the European Semester.

²⁵ EMIN2: Peer Review on Coverage/Take Up, Helsinki (March 2018).

²⁶ EAPN: Position Paper on Adequate Income (June 2020)

- **MI should be viewed as part of an integrated active inclusion approach**, and a crucial element in an EU multidimensional, integrated anti-poverty strategy.
- **Reference budgets of baskets of goods and services to check the adequacy of MIS need to be further developed**, for different household types and with the involvement of people, not only with those in poverty.
- Progress should be made on **agreeing common EU definitions of adequacy, coverage and enabling support**, as well as a **common EU wide framework and methodology on reference budgets**.
- A better visibility and **mainstreaming of the benchmarking indicators** agreed by the Indicators Sub-Group (ISG) of the Social Protection Committee (SPC) should be pursued **to check the adequacy, related to the AROP level**. For EAPN, **EU-level indicators to capture the coverage of MIS, particularly the take-up rates and the effectiveness of enabling support²⁷**, should also be developed.
- **Research, awareness-raising, mutual learning and peer review** should be carried out and supported by EU funding **on how to increase the adequacy of long-term financing of adequate minimum income**, as well as benefits of methods to positively support participation and job search, as opposed to negative activation with conditionality²⁸.
- **Country-specific Recommendations (CSRs) should trigger concrete policy action and sanctions when MI falls far short of adequacy**. This would also need to be flagged up e.g. in the Joint Employment Report (JER) as “critical developments” which require an urgent coherent and coordinated response with the macroeconomic policy CSRs. For EAPN this means **supporting investment in minimum income schemes by increasing tax revenues through increased tax collection, effectively tackling tax evasion and by means of more progressive taxation schemes**. EAPN members have also observed that the Country Reports and/or CSRs do not put enough attention to the cost of living compared to earnings –in particular for workers with pay at MW levels –and to the related social and economic impacts.
- **EU funds should be targeted to support the development of effective national minimum income schemes**.

Hard instruments/EU legislation

- **Soft law alone is failing to guarantee an adequate minimum income in most countries**, nor is it succeeding in effectively reducing poverty. EAPN believes that a **European Framework Directive on Minimum Income** is needed to guarantee this right and to provide a level playing field across the EU on minimum social standards.

²⁷ Monitoring “Enabling” support implies that beneficiaries of MIS are actively involved in the assessment of their benefits and their long-term impact on social participation, education, vocational training and lifelong learning as well as access to sustainable, quality jobs.

²⁸ Other key areas for research include the issues of non-take up of MI benefits, smoothing transitions between MI and unemployment benefits, the removal of disincentives to MIS to ensure that people do not fall through the net.

- The **Directive** should **provide a common EU framework, setting out minimum requirements:** establishing common objectives, common principles, definitions and methods to guarantee this right across the EU, **referring back to MS the establishment of the conditions of access and detailed rules of application** in order to take account of the situation in each MS. It is not at this stage proposed that the Directive should fund directly an EU-level minimum income payment²⁹.
- The **indicator for adequacy** proposed is the **at-risk-of-poverty (AROP) threshold** (60% median income) which should at least be attained, **underpinned by national reference budgets**. The function of reference budgets is to more adequately reflect the living standard which can be afforded in a country with an income corresponding to this threshold and the actual price levels for the goods and services included.
- EAPN’s Legal Opinion and Working Paper, both issued in 2010, confirm that **a legal base for a Framework Directive on Minimum Income exists** in the field of the integration of persons excluded from the labour market (TFEU art 153, 1, h). There is **no formal objection that can be found in the Treaty to legislate on financial support for the integration of people who are excluded from the labour market**. These issues as well as a proposal for a Framework Directive are elaborated on in more detail in sub-sections 3.3.4 and 3.3.5. It is also included in the [EAPN Working Paper on A Framework Directive](#) and in the [Legal Opinion](#) (2010) as well as in the Final Reports of the EMIN 1 and EMIN2 Projects³⁰.
- **Support for an obligatory EU framework on MI has been gained from an increasing number of key actors** galvanised by the work of EAPN and EMIN. These organisations include the [EESC](#), [ETUC](#) and the [Social Platform](#). There is also support for an EU framework to guarantee adequate national schemes from the [European Parliament Resolution adopted in 2017](#).

PRINCIPLE 12: SOCIAL PROTECTION

SDG Goal 1 and Goal 10 seeks to “**reduce inequality within and among countries**”, emphasizing income growth of the bottom 40 per cent of the population, the elimination of discrimination, as well as the adoption of policies, especially fiscal, wage and social protection policies.

EAPN in its [response to the consultation on Access to Social Protection \(2018\)](#) highlighted 5 key challenges in its response:

- 1) **Social protection should not be restricted to those in work, but cover risks of all throughout the lifecycle, regardless of employment status.** Adequate social protection for all, providing for lives in dignity for both those who can and cannot work, is the cornerstone of both an inclusive Europe, free of poverty, as well as a sustainable recovery, as per the EPSR principle.

²⁹ See [EESC own-initiative opinion for a “European Framework directive on a Minimum Income”](#) (SOC/584), adopted on 20.02.19.

³⁰ Cf. [Synthesis Report EMIN 1 Project](#) (January 2015) and [Final Report EMIN 2 Project](#) (December 2018)

- 2) **This initiative must not implicitly encourage an employer culture when insecure contracts proliferate, nor a highly segmented labour market where unstable work is the norm.** While reinforcing income security and providing adequate coverage for all workers, and particularly those in precarious employment, is crucial, quality and sustainability of work and employment, stable contracts and adequate pay and social security contributions.
- 3) **The responsibility of providing adequate social protection rests with contractual relations and the welfare state.** EAPN denounces any attempt to shift responsibility to the individual, or to move towards a private insurance system of social protection. Protection should be given to a state insurance system in which all pay their fair share, with increased support from progressive taxation. Benefits like health and family care should be redistributive, not based only on employment-based contributions.
- 4) **Coverage by adequate social security must be mandatory.** As identified in the background paper, lack of understandable information about one's rights, or difficulty in tackling the associated red tapes, are strong deterrents in the redistribution of rights and resources. All workers, regardless of type of contractual arrangement or other distinction, must benefit from the same portable employment rights and entitlements, and mandatory coverage by adequate social protection.
- 5) **Trade-off between coverage and adequacy.** While striving to not leave anybody behind, all benefits must be set at a level which affords recipients and their families a life in dignity, avoiding a situation where providing for more people results in lower levels of income support.

EAPN welcomed the Council Recommendation on Access to Social Protection but raised doubts to its effectiveness in providing the necessary level of adequate protection to all workers regardless of employment status, particularly in the context of increasingly precarious new ways of work. A longer-term problem is the limited EU definition of the scope of social protection, rather than the broader approach of the [UN/ILO Social Protection floor](#), which treats social protection as a basic right, through the life cycle, irrespective of employment situation and status, underpinned by re-distributive tax funding rather than only employment-based contributions.

A further concern is the continuing evidence that the European Semester **treats social protection primarily as a cost, rather than an investment**, with the primary focus of the CSRs focused on 'sustainability' and cost effectiveness of national systems, as the dominant objective in the CSRs, rather than adequacy linked to Principle 12.³¹ Studies show that MS with a high level of social security and protection have a higher work efficiency.

The **impact assessment of the proposal for a Recommendation on Access to Social Protection** aptly describes the challenges behind Principle 12. EAPN would be of the view that careful and transparent monitoring with stakeholders including civil society should be followed by an impact assessment in 4 years' time, to assess whether the Recommendation has been effective, or whether a Directive would be more suitable. As access to social protection is dependent on employment within the EU, it is one of the key criteria/principles necessary for quality employment (See EAPN [quality work principles](#).) and needs to be monitored with Principle 5.

³¹ EAPN: Is the European Semester more social? EAPN assessment of the European Semester 2019 (Sept 2019).

Key areas that will need to be monitored are:

- **Coverage and adequacy**, particularly issues of duration and level of social protection benefits, regardless of employment status.
- **Guarantee of effective minimum protection for all**: with high priority to check impact on the most vulnerable groups i.e. people in precarious jobs: including zero and low-hour contracts, involuntary part-time work, temporary work and bogus self-employment.
- **Checking that flexi-security (Securiflex) is not being used** to support flexibility over social protection.
- **Effective management of transitions** for workers involved in 'revolving door' access to work i.e. in and out of low paid, precarious jobs and unemployment.
- **Portability of workers' rights** cross borders and the actual implementation.
- **Concerns over access to training** for all workers, particularly those in low paid and more precarious jobs.
- **The effectiveness of work-life balance**, monitoring the transposition and implementation of the work/life balance Directive.
- **Checks on the effectiveness of affordable access to health care**, particularly out of pocket payments, the quality of care for different vulnerable groups.
- **Gender and age-discrimination gaps, as well as discrimination against other groups** based on sex, racial or ethnic origin, religion or belief, disability, or sexual orientation as well as socio-economic bias.
- **The overall context of new forms of work**, driven by new, exploitative business models will need to be a constant reference point.³²
- **Trade Unions and collective bargaining**, as well as social dialogue are recognised rightfully as key actors. **Civil Society organisations** like anti-poverty organisations who work people with people experiencing low wages/precarious work and in-work poverty, should be included as essential dialogue partners to this monitoring process, including the people themselves.

Soft Instruments supporting upward convergence

- **The Council Recommendation on [Access to Social Protection](#) needs to be implemented** prioritising the extension of mandatory and effective coverage, and adequacy of benefits to all workers (employed and self-employed) as a main priority, together with the considerations highlighted above.

³² EAPN: The Future of Work: labour market trends and their implications for risks of poverty and social exclusion.

- These **criteria should be monitored rigorously through the European Semester**, with particularly attention paid to ensuring the coherence of macroeconomic CSRs to support the necessary investment by the State to guarantee implementation, rather than prioritizing ‘cost-cutting’.
- **New indicators should be developed** in the area of social protection, e.g. adequacy of pensions. More investment should be made in involving people facing poverty in indicator design, particularly regarding criteria and flagging up gaps.
- **Adequate financing of social protection should be a key priority**, introducing indicators/benchmarking to ensure social protection spending should not fall below 35% of GDP,³³ increasing revenue by tackling tax evasion/avoidance and more progressive tax systems including tax on wealth, property, inheritance and capital³⁴ as well as health taxes³⁵.

Hard Law/EU legislation

- **EAPN strongly backs the need for a Framework Directive to guarantee access to social protection.** We support the ETUC³⁶ view that an impact assessment should be carried out in 4 years’ time, involving the social partners. Discussions with civil society organizations particularly those working with low-paid and vulnerable workers should also take place to ascertain whether a further legal instrument is needed to achieve the expected results. The social and economic impact of COVID-19 only underlines the urgent need to guarantee social protection to all regardless of employment status.

PRINCIPLE 6 FAIR WAGES

CONNECTED PRINCIPLES - 3: Equal Opportunities, 4: Active support to employment, 5: Secure and adaptable employment, 8: Social dialogue

SDG Goal 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and **decent work for all.**

EAPN has consistently and for many years worked on the topic of decent wages, with a long-standing focus on fighting in-work poverty and promoting quality jobs and employment as well as integrated active inclusion policies as key elements of an integrated strategy to fight poverty.

³³ EAPN: Financing Social Protection Reflection Paper (2018)

³⁴ EAPN: Delivering Agenda 2030 for People and Planet: EAPN proposals for a post Europe 2020 strategy.

³⁵ For example in Finland: ‘Delicacy Tax’, taxing unhealthy products high in sugar/unsaturated fats etc.

³⁶ ETUC Position Paper for the Action Plan for the EPSR which has been adopted in October 2019.

EAPN in 2011 elaborated [10 EAPN Principles for Quality Work](#) reflecting our members' view on what constitutes a quality job and decent working conditions³⁷ – not surprisingly the issue of adequate wages and of living wages is listed first³⁸. In 2017 EAPN issued a [Position Paper on Inclusive Labour Markets – Building pathway approaches to quality employment](#), further elaborating on the EAPN's view on inclusive labour markets which would “holistically support those who can work into quality employment, while equally promoting social participation and dignified lives for those who cannot work” (p. 4), building on an integrated active inclusion approach. In 2018 EAPN published the [Analysis Paper “The Future of Work’: Labour market trends and the risks to poverty and social exclusion”](#) which i.e. also deals with quality work and the quality of contractual arrangements and contains EAPN's related proposals and recommendations. In 2013 EAPN issued a [Position Paper on In-Work Poverty](#) and in 2014 elaborated the [EAPN Explainer on Quality Work and Employment](#). The 2017 [European Meeting of People Experiencing Poverty focused exclusively on in-work poverty](#), producing a [full report](#) and a [short report](#) with key messages to policy makers. Much of all this earlier work was taken up in a [Compendium of Promising Practices – Combatting In-Work Poverty](#) published in 2019.

Current data provided by the EU show little progress on fair wages or decent jobs.³⁹ This is primarily due to downward pressure on wages, increasing wage gap between directors and other workers, with globalisation driven by exploitative business models searching for re-location/sub contraction with cheaper workforces, both within the EU and outside.

Work is increasingly not a viable route out of poverty. In-work poverty is rising, currently at 9.6% (2018). Poorer workers are often trapped in low-paid jobs, with insecure working conditions. The rise of gig economy and platform working has exacerbated this development, leaving people vulnerable and on low wages. Sectors that face low wages, are predominated by women, ethnic minorities and migrants.⁴⁰

The worrying growth of exploitation and ‘unpaid work/modern slavery’ facing key at risk groups, particularly undocumented migrants, women and young people is a new challenge, as well as ‘forced volunteering’ – in relation to punitive activation models, i.e. the ‘work fare model’.⁴¹

The decline in trade union membership, collective bargaining and collective agreements also contributes to lower wages. During the crisis, the EU's Stability and Growth Pact put negative pressure on wages, and undermined collective bargaining (See ETUC 2020⁴²). This is evident from our annual assessments with our members in the European Semester, particularly of the CSRs⁴³, as well as by the ETUC 1st phase consultation on fair minimum wages. Because of the above, **EU Action to ensure a floor for minimum wages is key.** The Commission's commitment to creating a floor, with its proposals for consultation on EU action is welcomed. However, it should be clear that the overall goal is decent wages and quality work for all. The risk to focussing only on minimum wage is that it can contribute to the suppression of overall wage levels. The question of adequacy of wages is a crucial one.

³⁷ In line with the [ILO Decent Work concept, principles and agenda](#).

³⁸ The other key issues covered comprise employment rights, social protection, quality working conditions and working environment, the reconciliation of private and professional life, the right to participate in collective bargaining and social dialogue, protection against discrimination, access to training and personal development, progression in work, and job satisfaction.

³⁹ Joint Employment Report 2020.

⁴⁰ JER 2020 and Employment and Social Development Outlook 2019

⁴¹ See EAPN monitoring of Employment developments through the Semester Assessments eg Is the European Semester more Social/ Sept 2019.

⁴² [ETUC response to 1st phase consultation on fair minimum wages \(2020\)](#)

⁴³ See EAPN European Semester assessments including of the CSRs, NRPs, AGS 2019.

Statutory minimum wage rates (which, according to Eurostat, exist in 22 out of 28 Member States) do not often come with a guarantee of providing income adequacy for all workers. The term “living wage” emerged from the recognition of the need to focus on the provision of decent wages through paid work, which surpasses the rather low limits often set for a minimum wage rate, in order to provide a worker with an acceptable standard of living. The aim should be to achieve minimum living wages – i.e. at levels that ensure a decent living standard.⁴⁴

EAPN supports the development of an EU framework together with social partners to guarantee minimum wages/living wages that can take people out of poverty. EAPN backs the overall approach and main objectives set out in the consultation document. We fully support the idea of an EU obligatory framework to establish and ensure adequacy of minimum wages in all countries. The overarching aim of such an instrument should be to contribute to progress towards decent wages and quality jobs for all, resulting in the reduction of in-work poverty.

This can best be achieved by the definition and enforcement of a set of common minimum requirements all MS have to comply with. For EAPN three points stand out in this regard: 1) The coverage of the whole workforce by MW arrangements, 2) the level of pay and therefore the adequacy of MW (in relation to take-home pay levels sufficient to protect workers against poverty and to support a decent living on the backdrop of price levels and living costs in a given MS), and 3) the mechanisms in place to guide adjustments of (statutory or collectively bargained and agreed) minimum wages. The first aspect concerns the existence of lower minimum wage levels for specific groups, e.g. young workers or people with disabilities, long-term unemployed. The second aspect is taken up in the next bullet point. The third aspect concerns the set of clear criteria used to monitor MW developments and to decide on updates at a reasonable frequency or regularity.

For EAPN, the value-added of an EU Directive would not only consist in the requirement for a minimum wage for all countries, whilst respecting the national means and procedures to achieve this, but also in the establishment of a clear comparable EU benchmark for adequacy. This would also help addressing increased income inequalities and reversing increasing wage divergences between high- and low-level wage earners in many countries. The reference value for a decent amount could be fixed (at the end of a longer transition process, taking into account current levels, country-specific conditions for certain groups of workers and/or sectors as well as the general economic situation) at 60% of the median wage or of the average wage. If the benchmark chosen was the median wage, the 60% share of the national median wage, however, cannot be considered as adequate in countries where wages are very low. There it would rather as a general benchmark that needs to be tested against real living costs and disposable income of a worker after social benefits and taxes in a given country. National reference budgets calculating costs of essential goods and services for workers are essential benchmarks to monitor the adequacy of income (both wages and income support). In the case of wages, the calculation includes the full costs of working (i.e. transport, childcare, clothing and additional costs).⁴⁵

⁴⁴ See EAPN Living Wage Campaign and [2 pager on living wage](#)

⁴⁵ See Vincent Partnership for Social Justice: Minimum Essential Standard of Living (MESL) – Update report 2019 at [www. Budgeting.ie](http://www.Budgeting.ie)

For EAPN it is important to establish a positive hierarchy between adequate minimum income (to be established above the poverty threshold, set in the EU context to 60% of the national median equivalised disposable income after social transfers⁴⁶) **with a net minimum wage**. MW needs to be set above MI in order to provide a positive and rights-based incentive to work rather than driving down basic benefits and or setting punitive conditionalities in the context of labour market activation policies which can push people into low quality and/or precarious employment.

EAPN **also supports the intention shown in the consultation document to require collective bargaining and the "effective involvement of social partners in the adjustment of minimum wages"** (p.10), as absolutely essential when setting MW, as well as to have "transparent national frameworks based on clear and stable criteria" in order to achieve and upgrade MW.

EAPN recognizes the current legal obstacles to a legal framework on levels under the present Treaties, **however supports progress towards the establishment an EU framework** to ensure adequate minimum wages, and to require statutory minimum wages where no minimum wage exists and wage levels are low.

For more detail on these issues, please [see EAPN's position on adequate income – minimum income and minimum wage](#).

Soft Instruments to promote upward convergence

PEP 2019 EU Meeting

Key Messages on employment/fair wages:

- Governments and EU must combat low pay and unpaid work and support adequate wages for a life in dignity ending forced work and modern slavery and forced volunteering through 'workfare'.
- Need personalised, integrated support, according to an Active Inclusion approach, with simplified bureaucracy and information.
- Quality, relevant training for workers (paid for by employer) and for job seekers.

- **Prioritise progress towards quality work**, developing quality employment principles and indicators including adequacy of wages, benchmarked to the 60% of median wage, but also reference to wage share and relation to GDP.
- **Through the European Semester adopt a pro fair-wage/decent work priority**, encouraging and providing CSRs to increase wages, and to support the establishment of a statutory minimum wage at decent levels, where none exists, and wage levels are low.
- **Prioritise and examine more systematically the in-work poverty rate**, in relation to gender and specific groups, and require actions to increase wages, increase employment security and against involuntary part-time work, countering discrimination in pay rates, including closing the gender pay gap, in order to ensure that **decent work is a sustainable route out of poverty**.

⁴⁶ See [here](#) the relevant EUROSTAT definitions, used i.a. in the context of the Europe 2020 Strategy and the European Semester, but also in the annual EC Employment and Social Development Reports (here for [2019](#)).

- **Monitor the increase of ‘forced volunteering and work’** as a key violation of rights, and provide recommendations requiring employment contracts and ‘decent wages for work’.
- **Support person-centred, rights-based supportive active inclusion approaches** as part of an EU antipoverty strategy which support people into effective training, quality jobs and participation.
- **Set CSRs to support the increase in trade union membership and collective bargaining**, as essential pre-requisites for achieving fair, living wages and establish a social standard floor.
- **Support participation of people facing in-work poverty, and the NGOs that support them**, ensuring consultation in the design, delivery and monitoring of both activation services and in dialogues on in-work poverty and monitor through the Semester.

Hard law/EU legislation

- **Progress towards an EU obligatory legal framework, for establishing minimum living wages**, which allow for a decent standard of living for workers and their families (as outlined above).
- **Use the benchmark of 60% of median wage as an indicator of adequacy, alongside reference budgets** to reflect the real cost of living and working, whilst providing a positive hierarchy above Minimum Income. Consider also indicators reflecting wage share of GDP and wage gap.
- **Require statutory minimum wages** in all countries where wage levels are below the median, and where strong collective bargaining instruments do not currently exist.
- **Require the establishment of strong collective bargaining** as key means to ensure progress towards fair wages for all, decent jobs and inclusive labour markets.
- **An EU directive to address the gender pay gap and binding pay-transparency measures** is also needed in order to bridge the gaps that enhanced coordination within the EU Semester has been unable to address.

PRINCIPLE 20 ACCESS TO ESSENTIAL SERVICES

Including Energy Poverty and linked to Principle 19: Housing and Assistance for the homeless, Principle 11: Childcare and support to children, and Principle 16: Health care and Principle 18 Long-term Care.

SDG 1 aims to end poverty in all its forms everywhere; **SDG 3:** Good health and well-being; **SDG 6.** Ensure availability and sustainable management of water and sanitation for all; **SDG 7** Ensure access to affordable, reliable, sustainable, and modern energy for all; **SDG 10** Reduce inequality within and among countries; **SDG 11.** Make cities and human settlements inclusive, safe, resilient and sustainable including “*access for all to adequate, safe and affordable housing and basic services and upgrade slums*”.

For EAPN the provision of universal services is the vital core of social protection and welfare states. They are crucial in **preventing and tackling poverty** & social exclusion, and act as a lynchpin to the European Social Model. With the **impact of COVID-19** this has become self-evident and emerges as a key priority for EU and national action. Equal and affordable access to quality universal education, health, social and housing services is also one of the three main pillars (in addition to income support and inclusive labour market) of the Active Inclusion Strategy⁴⁷ (2008) which should underpin an Integrated Anti-Poverty Strategy as highlighted above.

In setting future policies and strategies for implementing principle 20 '**accessibility of services**', **affordability, coverage and quality must be key criteria.** There is also a need to **ensure universality, guaranteeing the right for all** as part of an essential social compact to ensure quality services for everybody, combined with additional targeted measures to achieve effective access for vulnerable groups and antidiscrimination measures (targeted universalism). EAPN believes that the new European Pillar of Social Rights linked to the UN Sustainable Development Goals Agenda for 2030 should provide an overarching rights-based framework⁴⁸ for a post 2020 Strategy.

However, in reality **the right to essential services, particularly to public services, has been consistently undermined by their accelerated privatisation and liberalisation,** seeking profit above the common good. This has been linked to a shift away from universalism towards targeted services, under pressure from austerity measures. The European Semester has too often supported this view. With the impact of COVID-19, a renewed focus must be made to invest in public services, to guarantee the public good.

All public services, health, education but also water, waste, sanitation, transport, digital and financial services as well as social services and justice systems, provide an **essential public infrastructure that represent essential common public goods** to EU citizens, a flagstone of the European Social Model. The EAPN EU Inclusion Strategies Group (EUISG) in 2017 elaborated their report '[Nobody left behind](#)'. In the 2019 [People Experiencing Poverty meeting](#), health and housing were highlighted as [key priorities](#), and facing mounting threats.

We highlight here key priorities related to '**essential services**' quoted Principle 20.

Energy Poverty, and the right to affordable, clean energy is a key challenge, with rising energy poverty affecting more than 50 million people, and where 1 in 10 cannot heat their home properly and 1 in 5 cool them in summer.⁴⁹ It must be a key focus in the European Green Deal and Just Transition. An integrated approach which supports adequate income, reduces energy consumption and promotes fair prices is crucial. Promoting⁵⁰ decent affordable housing combined with energy efficient measures are key means to reduce energy consumption and energy poverty thus supporting the EPSR and Just Transition. Investing in social affordable, energy efficient housing is a clear win-win for a Social and Green Deal.

⁴⁷ Communication from the Commission on a Commission Recommendation on the active inclusion of people excluded from the labour market, COM/2008/0639 final, 3 October 2008, <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:52008DC0639>, and Commission Recommendation on the active inclusion of people excluded from the labour market (2008/867/EC), 3 October 2008, <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32008H0867>

⁴⁸ EAPN: Nobody left behind: ensuring access for all to affordable, quality housing and public health services.

⁴⁹ Right2Energy [Coalition: Statement on Green Deal](#):

⁵⁰ EP with EAPN: [Energy Poverty Handbook](#)

Proposals on other key public and essential Services are elaborated below by linked Principle.

Soft Instruments for Upward Convergence

- **Rebalance the focus in the European Semester, towards ensuring universal access to affordable services in all areas**, rather than viewed predominantly as a cost and a target for restructuring.
- Include access to all key services as a priority pillar in an integrated EU antipoverty strategy as outlined above and monitor comprehensively.
- Access to services must cover **accessible as well as affordable, quality universal services** i.e. geographical coverage, disability access, as well as access to waiting lists and for all groups. It must also be environmentally sustainable i.e. support the circular economy.
- In the area of **Energy Poverty**, to ensure that the European Green Deal delivers a Just Transition assert the right to *affordable*, clean energy and develop obligatory EU guidelines/guidance to ensure the development of effective, rights-based approaches to fight energy poverty in the national [climate and energy plans](#), based on the 3 pillar approach (adequate income, reducing consumption/energy efficiency and fair prices), consistent with Principle 20 of the EPSR.
- **Further EU action is needed to ban disconnections**, which deprive people of their right to energy, stop the phasing out of regulated prices in the energy sector for domestic households and support social tariffs for vulnerable customers.
- **Assign an ambitious share of EU Just Transition and EU Invest financing to support energy efficiency and decent housing**, including expansion of social housing measures targeting low income households ensuring no additional costs in housing or bills for these households.^{51 52}

Connected Principles

Housing and Assistance for the homeless (Principle 19)

PeP 2019 EU Meeting

Key messages on housing⁵³

- Treat housing as a fundamental right not a financial good.
- Ensure Access to decent social housing
- Make decent housing affordable
- Address speculation

⁵¹ [Right2Energy Coalition](#) and [EPSU/EAPN Statement on Right 2 Energy](#) (2017)

⁵² [Right2Energy Statement on Just Transition](#); A green new deal for all.

⁵³ EAPN 18 PeP EU meeting: Short , 18 and 19 November 2019 (March 2020)

Soft Instruments to support upward convergence

- **For EAPN, Access to decent, affordable housing, guaranteeing protection and support against homelessness is a major priority** in the fight against poverty and in relation to guaranteeing the right to key essential services. COVID-19 has only exposed the vulnerability of this right, for low income households, under threat from eviction as they are unable to pay rent, increasing risk of homelessness. Homeless people themselves are particularly vulnerable to infection, on the streets and in shelters, unable to follow hygiene or social-distancing rules. This must provide a new push to reinforce the right to affordable housing and protection from homelessness across the EU.
- The European Semester should ensure that the Country-Specific Recommendations (CSRs) **treat housing as a social right**, rather than primarily as a market for growth. It must **address speculation and support the increase of adequate and affordable housing** for low income groups, including through significant investment in **social housing**. EU funds including ESF, ERDF and EU Invest should support the growth of **new housing provision** including local/regional social housing cooperatives owned by people themselves.
- The Semester should give strong backing in the Country Reports with CSRs to the **prevention of evictions, the promotion of national cross-sectoral strategies to tackle homelessness⁵⁴**, investing in *Housing First strategies* and ensuring a *stop to criminalisation* of the homeless.
- **The EU should support regulation of rents** particularly where there is evidence of market failure, increasing support for tenant's rights and the right to access to affordable private rented housing so as to guarantee the right to decent affordable housing particularly for low income households. Actions should be taken to incentivise owners to make accommodation available and prevent empty property.
- **Progress should be made on a common EU definition and indicator for 'affordable' housing costs**, which should not go beyond 25% of household income, rather than the current calculation of housing overburden of 40%, which does not take sufficient account of other household expenses.
- **EU minimum quality standards on housing** should be agreed and monitored, taking the indicators from the EU SILC as a minimum. Such absolute standards should also be benchmarked in relative terms in relation to country norms.
- **A strong priority should be given to increasing public investment in social housing** rather than relying mainly on the private market to address social housing need, with support from EU funds e.g. EU Invest and ERDF. These should be recognized as key social investments and part of a Just Transition and discounted as deficit calculations, within the Stability and Growth Pact.

⁵⁴ FEANTSA www.feantsa.org

- **An EU wide indicator should be introduced to monitor social housing provision and its impact on housing need as well as a concrete indicator to measure homelessness**, covering the widest scope of homelessness defined by the [ETHOS](#)⁵⁵ framework. A composite housing exclusion indicator should be developed linking existing EU SILC indicators (e.g. on housing cost, rent arrears, overcrowding).
- **The participation of people facing homelessness and housing exclusion** is crucial to achieve viable policy solutions in national and EU decision-making processes, together with the NGOs that support them.

Healthcare (Principle 16) and Long-term care (Principle 18)

PeP 2019 EU Meeting

Key Messages on Health and Social Care

- **Good Quality Health and Social care for all, including for vulnerable groups**
- **Government to fight and reverse privatisation**
- **Overcome the lack of political will and implement existing legislation**

Soft law to support upward convergence

- **The current distinction between health and care services is problematic**, including in the EPSR. The COVID-19 epidemic has only underlined the need for a holistic definition and strategy to cover both services as an integrated and universal public provision.
- **The EU should create an adequate framework to guarantee the right to affordable, universal, quality health and social care** services for all, covering all essential health and care services (including prevention, primary, community, hospital and specialist care, dental, mental health, social and long-term care and the cost of medicines). The Semester should give specific focus to defending universal provision, as a public good.
- **Equal access for all groups and in all areas must be ensured**, in terms of disability but also rural/city divide, for key target groups: including Roma, migrants, homeless etc.
- **A specific commitment should be made to universal public health** and an independent assessment carried out of the impact of privatisation and liberalisation on access to affordable, quality health care. Recommendations should be made to support the financing of universal systems through either progressive tax systems or national health insurance schemes where all pay into the system according to their means.
- **EU macroeconomic policy as shown through the European Semester must visibly move away from an austerity and market** focus on only cost-effectiveness and efficiency in health services, giving a new priority to the right to health/care ensuring quality, equity and affordable access.

⁵⁵ See FEANTSA: www.feantsa.org; from rough sleeping to those in emergency accommodation, overcrowded housing, “hidden homelessness” etc.

- **EU mobility and transferability of rights** to affordable health services must be clarified and guaranteed as part of the support to EU people's mobility, ensuring that all groups can access rights, including undocumented migrants.
- **Increase monitoring of national legal frameworks** and obligations, including commitments to universality, non-discrimination, reimbursement of costs, waiting lists etc.
- **Transparent monitoring of EU funds spending on health** (New MFF) should be carried out with the involvement of civil society to ensure that EU funding supports affordable access to quality public health for all.
- **Poverty and social exclusion must be recognised as major social determinants of health inequality** which lead to long-term social and economic costs. The link between the two must be closely monitored and mainstreamed, building on key new studies. It is a key example where the multidimensionality of poverty and inequality intersect. There are 2 key aspects. Firstly, social determinants of health linked to poverty and social exclusion, and inadequate access to key services like decent housing, directly impacts on people's health outcomes. Secondly, the determinants also impact on how people access or receive health care. This includes affordability, but also additional or targeted services which they might need to address health disadvantage. This can be at community or individual level.
- **The COVID-19 epidemic has exposed the impact of pre-existing health inequalities as well as unequal access to health and care services. A full study must be made** to assess the key factors and links to social determinants, with core Recommendations for future investment to ensure universal coverage of health and care services, as well as targeted action to compensate for inequalities.
- **The users** (patient, people facing poverty and social exclusion and those currently unable to access health services) must be made key actors in the design, monitoring and support in delivery, particularly through the European Semester.

Childcare and support to children (Principle 11)

Access to early childhood education and care of good quality is crucial. However, **a strategy to give children the right to protection from poverty** (part b of principle 11), must recognize the multidimensionality of poverty and needs an integrated approach rooted in children's rights and support to the parents within an overarching EU antipoverty strategy highlighted above. [The Child Guarantee](#), is a key initiative to ensure access to **free healthcare, free education, free childcare, decent housing and adequate nutrition**, but needs to be embedded in an integrated approach based on the Investing in Children Commission Recommendation⁵⁶- supporting access to resources, services and participation. Increased priority should be given to supporting play and creative activity for children, particularly from poor families, as a pre-requisite for personal growth and development and active citizenship.

⁵⁶ EC: Investing in Children Commission Recommendation (2013)

Soft law to support upward convergence

- As partners to the recent [investing in Children Alliance joint statement](#)⁵⁷, EAPN supports the **adoption of the Child Guarantee, with a Council Recommendation, building on the Investing in Children Commission Recommendation (2013)**, that recognizes the multidimensionality of poverty and frames the Recommendation within an **integrated approach tackling the needs of children and their carers/parents**.
 - 1) Access to adequate resources and benefit.
 - 2) Access to affordable, quality and inclusive services,
 - 3) Children’s right to participate in cultural and recreational activities and in decisions made for their lives.
- **Ensuring that the Council Recommendation has a clear implementation plan** to ensure effective monitoring and is properly financed and interconnected to other EU financial instruments beyond ESF+.

Access to Services: Hard Law

- EAPN continues to support the need for progress towards an **EU Directive regarding protection of universal public services, to ensure the public good is safeguarded** to avoid an increasingly marketized, profit-driven model.
- The absence of any obligatory **right to housing** is a major weakness in the EU social model. The EU must be seen to actively pursue a housing rights agenda. The right to a decent and affordable home should be seen as key EU acquis drawing on a growing EU and international jurisprudence in relation to housing rights⁵⁸. The right to housing should be enforced regardless of residence status, to ensure access to rights for migrants, homeless people and other excluded.

PRINCIPLE 1: EDUCATION, TRAINING AND LIFELONG LEARNING

SDG 4: Ensure inclusive and equitable quality education and promote life-long learning opportunities

EAPN advocates for the right to **universal, quality, affordable, accessible and inclusive public education throughout the life-course for all**.⁵⁹ For EAPN and its members, school and pre-school education, vocational education and training (VET) and lifelong learning (LLL) are key public services and goods (at EU level framed as Services of General (Economic) Interest)⁶⁰.

⁵⁷ Investing in Children Alliance Joint Statement proposals for a Council Recommendation on the Child Guarantee for the well-being for all children across the EU.

⁵⁸ FEANTSA (2016) 5 Key principles for implementing the housing priority in the European Pillar of Social Rights.

⁵⁹ See EAPN’s Issue Paper: [Leaving Nobody Behind: Prevention and reduction of poverty and social exclusion through education, training and lifelong learning policies](#).

⁶⁰ Health care, social services, housing, education, water, energy and transport, amongst others, represent essential public infrastructures and services. Services of general interest (SGIs) or services of general economic interest (SGEIs) – also commonly known as public services – fulfil people’s daily needs and are vital to their well-being. The quality of the life of people depends on their accessibility, affordability, quality and continuity. They are essential for sustainable economic and social development and regional cohesion in Europe and a Pillar of the European Social Model. For EAPN universal access to them is a fundamental right.

In our view, the **primary role of education is to empower and transform lives**, allowing individual women and men to reach their full potential and to fulfil their aspirations. It should also provide people with the right skills and qualifications for the labour market, thus enabling them to secure good quality, stable jobs which effectively shield them and their families from poverty and social exclusion. Last but not least, education should equip individuals with soft, horizontal, and critical thinking skills, so that they can take full ownership of their own life plan and build a meaningful rapport with their community, helping to strengthen our democracies through participation and active citizenship.

We therefore advocate for a **learner-centred, rights-based approach**, which puts people and their potential and aspirations at the heart of any learning activity. EAPN promotes lifelong learning (LLL) as a comprehensive, holistic vision of education, which should span throughout all the phases of the life cycle for personal and professional development through formal, informal and non-formal services.⁶¹

In setting future education and training policies for **accessibility of services, affordability, coverage and quality must be key criteria. There is a need to ensure universality**, guaranteeing the right for all as part of an essential social compact to ensure quality services for everybody, combined with targeted measures to ensure rights of access for vulnerable groups and antidiscrimination measures (targeted universalism). Ensuring the **active participation of people experiencing poverty** and social exclusion and their NGOs in the design, delivery and evaluation of these services is crucial if education policies and services are to play an effective role in preventing and tackling poverty and social exclusion.

In the [2018 EU People Experiencing Poverty Meeting](#): **Let's make Education a way out of poverty!** it was underlined that implementation of EPSR Principle 1 requires major public investment and a change of political paradigm - prioritizing fairer society, shared prosperity and human rights and well-being, with the aim being to make Europe poverty free. People experiencing poverty and their civil society organisations must be key partners in the design, monitoring, and implementation of these policies. The focus on education and poverty raised crucial questions around how to ensure real access to quality and inclusive education (particularly for vulnerable groups facing multiple obstacles), access to technology and the growing technological divide, the hidden costs of poverty in the education system, and how to prevent and support early-school leavers, amongst other topics.

Priorities for EAPN are to prioritize investment in universal free public education for all groups and to actively **counter discrimination on any grounds**, with particular focus on key vulnerable groups e.g Roma, migrants, but also children with mental health problems and poor families, promoting inclusion and universalism and outlawing segregation. Education should be provided throughout the life course, including early learning and care, promoting the right to education beyond skills for employment, supporting life skills and participation in the community, working in partnership with families, community organizations and students to adapt to their needs. **The validation of non-formal and informal education is key**, as it is exactly this kind of educational support which appeals to people who may have not done well through formal systems.

The European Semester has a key role to play, but careful coordination must take place with the EU Education Area, particularly as far as driving broader objectives beyond skills and employment.

⁶¹ EAPN: Nobody left behind

The **explicit link between ESF+ and the implementation of the EPSR** is clear. However, it will be important for educational approaches **not to be geared only to accessing any job**, but as part of a rights-based approach for delivering on the priority on promoting social inclusion and fighting poverty, including as part of the enabling condition to have an integrated strategy to fight poverty in place. The indicators of success must more clearly reflect this priority i.e. progress to social participation and inclusion not just employment.

In terms of the **European Green Deal and Just Transition**, skills training is clearly vital, however, more emphasis could be given to increasing **'access to relevant quality, training for hard-to-reach groups'**, **so that they also can benefit from the green transition**, as well as in circular economy initiatives (for example social enterprises).

Discussion is underway about **Individual Learning Accounts**; however, this needs to be rights-based, available irrespective of employment status, and recognize the fragile employment history of many people currently experiencing poverty and social exclusion. Creating support for NGOs (e.g. Members of EAPN) to invite experience experts in poverty and exclusion to capacity buildings and/or training courses can be beneficial when encouraging beneficiaries to participate more in society or the local community.

The **involvement of trade unions in work-related training/LLL and NGOs** working with people on the ground and particularly engaged in providing informal/non-formal education, will be crucial to design effective education that impacts on poverty and social exclusion.

Soft Instruments to promote upward convergence

- **Require systematic implementation through the European Semester coordinated with the EU Education Area (EEA)** pressing for implementation of social rights and access to universal, quality and affordable education, VET and LLL throughout the life course, prioritising CSRs for those EU MS which have made low progress or have major problems with ensuring equal treatment for poor, or excluded groups.
- **Include in the Multi-Annual Financial Framework (MFF) and more specifically in the ESF+ dedicated funding to support targeted investments in more inclusive education systems**, in support of informal and non-formal education in particular for NEETs and adult learners as well as accessibility, awareness raising and anti-discrimination measures.
- **Introduce socio-economic background as grounds for discrimination** in all European anti-discrimination legislation and support disaggregated data collection on educational attainment and completion to reflect all key groups.
- Ensure adequate investment to meet the needs of those requiring support with **basic literacy and numeracy**.
- Encourage and ensure the **active participation of children, youth and adults** in educational systems and services as well as in dialogue processes to develop and monitor educational and training policies.
- Include **action on non-formal education** in the European Education Area.

- Make and regularly **update an EU-wide inventory of existing systems and procedures to validate non-formal education, training and life skills**⁶², as the basis to then elaborate recommendations to EU MS with non-existing or underdeveloped validation systems and arrangements, backed up by the 2012 Council Recommendation on the validation of non-formal and informal learning (see footnote 16).
- **Redefine higher numerical education targets** for the “rate of early school leavers” and “number of young people neither in employment nor in education and training” (NEET) compared to those set in the context of the Europe 2020 Strategy, in order to stay politically ambitious and economically and socially sustainable, also set benchmarks for the quality of support for early school leavers. This should be done in the context of a comprehensive Post 2020/Europe 2030 Strategy, encompassing an Anti-Poverty Strategy, and when elaborating and implementing the Action Plan of the European Pillar of Social Rights.
- **Better target EU funds to support lifelong learning from a broader perspective** than labour market needs, for example through implementing enabling conditionalities in the European Social Fund/ESF+.
- **Prioritise in EU-funded lifelong learning programmes those with the lowest level of educational attainment**, in adult literacy, as well as those from low income families or suffering from discrimination when it comes to access to programmes, and concrete support measures.
- **Continue and expand the use of EU funding from ESF+ to co-finance language and integration** courses for migrant workers, refugees and asylum seekers and to improve the information on a range of issues in relation to their economic and social integration and rights.
- Continue and expand the use of EU funding from ESF+ to co-finance support measures for the **educational attainment and social inclusion of Roma children** and to overcome segregation and discrimination in the school and vocational training system.

⁶² This inventory endorsed by the 2012 Council Recommendation on the validation of non-formal and informal learning works, together with the European guidelines, as a tool to support countries in developing and implementing validation arrangements and can be accessed here, <https://www.cedefop.europa.eu/en/events-and-projects/projects/validation-non-formal-and-informal-learning/european-inventory>

Annex 1 Status of the Document

This consultation response was developed by the EU Inclusion Strategies Group, which has delegated powers within EAPN to develop EAPN policy positions and reports. A first discussion regarding the implementation of the EPSR input took place in the EUISG meeting in Finland on 14-15 September 2019. Following the launch of the consultation in 2020, a response was drafted by the EAPN Policy Team on the basis of the discussion in Finland, drawing on agreed EAPN positions, including EAPN response to the European Pillar of Social Rights, EAPN proposals for a Post Europe 2020 Strategy (2019), EAPN Issues paper on education, training and lifelong learning; EAPN Position on Adequate Income (2020). A first full draft was disseminated to EAPN members (EUISG, EXCO and EO's) on the 24th March 2020 with an original deadline of the 23 April. Following the cancellation of the EUISG meeting planned for Madrid (19-21 March), the deadline was extended until the 4 April. Written inputs were received from: EAPN IE, FI, PT, NL, ES. An interactive webinar was held on the 6 May involving EAPN BE, HR, CZ, DK, FR, FI, DE, EL, HU, IC, IE, LV, LT, MT, NL, NO, PL, PT,, SK, SL, ES, UK and European Organization Members: AGE-Platform, Eurodiaconia and IFSW with a final possibility for comments in the following week with inputs from EAPN FI, PT. The response was finalized and adopted by the EUISG on 1 June 2020.

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



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