

YES TO ACTIVE INCLUSION BASED ON FUNDAMENTAL RIGHTS

EAPN response to the Commission's Active Inclusion consultation

26 February 2008

EAPN confirms its support for the Commission's initiative on Active Inclusion. From our point of view, the added value of this initiative is mainly expressed by the following 7 points, that we expect to be clearly visible in the Active inclusion principles to be adopted:

- A sign of political will and a new impetus in the area of social policies
- An integrated paradigm based on three pillars of equal importance
- The ambition to impact on the definition of other relevant policies
- An appropriate responsibility given to employment policies in the fight against social exclusion
- A renewed focus on adequate minimum income
- Recognition given to the importance of services in the fight against poverty and social exclusion
- Support to participative approaches.

However conscious that such a positive approach may be fragile in a dominant neo-liberal work-first political context, we make detailed proposals for strengthening the approach. We also stress that active inclusion should be understood and implemented as a whole, bearing in mind that its three components are strictly interdependent, and that adequate income and services are a prerequisite to employment/social integration. We also call for Active Inclusion to be more clearly enshrined in a right's-based approach, and we propose subsequently a detailed set of recommendations on each strand, ensuring also preventive policies, that we hope will be taken on board in the drafting of the Principles.

We recommend that the implementation of Active Inclusion Principles is worked out through a strengthened OMC, a better consistency between the various processes impacting on social inclusion, and concretely supported by the financial instruments.

EAPN call for EU guidance to ensure qualitative participation of anti poverty organisations and the people experiencing poverty as a continuous dynamic process.

The mobilization of the public opinion will be also crucial to the success of the Active Inclusion approach that needs to be developed under a positive approach to people.

Context: *The Commission published on 17 October 2007 - International day for the eradication of poverty - a Communication on "Modernizing social protection for greater social justice and economic cohesion: taking forward the active inclusion of people furthest from the labour market" (COM (2007) 620 final). It is the second phase of a consultation initiated in 2006 with a first Communication on action at EU level to promote the active inclusion of the people furthest from the labour market (COM 2006 044). According to Article 138 (3) of the Treaty, social partners are invited to express their views on this proposal. In addition, all stakeholders are being asked to give their opinion on the **effectiveness and comprehensiveness** of its proposal to promote active inclusion.*

EAPN is a network which for more than 15 years has been gathering the expertise of people involved in the fight against poverty all over the EU. **We welcome this Commission consultation** as an important and timely initiative, which raises positive expectations from our side, at a time when we otherwise deplore the general political context at EU level which is not favourable to the fight against poverty and social exclusion.

EAPN has been following closely the development of this strategy. In 2006, we welcomed the setting up of this policy mix bringing together access to the labour market, adequate income and access to services, and stressed the need to meet the needs of people experiencing poverty without considering work only as the only route (see [Ensuring a decent income and a better life for all!, EAPN Position Paper, April 06](#)). We also did an analysis of the extent to which the active inclusion concept is taken on board by National Governments, through our analysis of the implementation of the Strategic Reports on Social Protection and Social Inclusion (2006-2008) (see [Light Year: Hard work!, Assessing the impact on Poverty](#), EAPN Report, October 07) and National Implementation Reports 07 of the revised Lisbon Strategy (see [Social Inclusion Scoreboard](#), EAPN Report, January 08). Several EAPN national members are also submitting their own contribution to this consultation directly to the Commission.

This EAPN response to the consultation presents

1. **Why we support this initiative;**
2. **The recommendations we make for this notion to be strengthened and fully implemented in a manner consistent with the recently proclaimed Charter of fundamental rights;**
3. **How active inclusion should be implemented in terms of processes and governance.**

We refer in our position to current policy development in various countries.

1. "YES" to active inclusion! Why.

Yes we support the current initiative of the Commission. The Commission consultation has taken up some of our major analysis and demands. Notably: the need for an integrated approach in the fight against poverty, the fact that employment alone is not the only route out of poverty, the need to address the inadequacy of minimum income schemes, the need for participation of all actors, including people experiencing poverty. More specifically, we have listed below the **7 key aspects** of the Communication that we know from experience can deliver on the ground, and that **we want to be kept and developed through the discussions** between Member States that will hopefully lead to the adoption, under the French Presidency, of the Commission proposal.

- **A sign of political will and a new impetus in the area of social policies.**

The Commission acknowledges the need for Member States to **take action** given the little progress made towards the EU objective of eradicating poverty.

It also gives a renewed focus to the Open Method of Coordination in the field of Social Inclusion and Social Protection (OMC on SISP), and builds on its outcome in terms of 'better understanding the complex phenomena of poverty and promoting a more holistic approach'. Without replacing the extent of the work being done under the OMC on SISP and notably its detailed objectives, the active inclusion approach can usefully open the way to a long-needed **strengthening of this key strategy**.

It also stresses the need to develop accessible quality services, adequate social protection, an inclusive labour market, and for EU financial instruments to support inclusion. By doing so it recalls that Inclusion should not only be the object of strong specific policies but also be mainstreamed in other relevant policies and funding programmes, in accordance with EAPN's regular call for serious **mainstreaming of social objectives**.

- **An integrated paradigm based on three pillars of equal importance.**

In the areas of services, adequate income and inclusive labour markets, we see some progress in some countries, but not in all three areas at the same time and in the same country.

The mismatch between labour market and activation is very well demonstrated in Bulgaria, where the success in decreasing the official unemployment rate has been accompanied with very low salaries and wages, increasing the phenomenon of working poor ¹.

And overall, national networks witness rather a predominance of labour market activation as the overarching strategy in the Member States. But unless activation is part of a comprehensive approach, it can have a detrimental impact on the most vulnerable people.

¹ Light year, hard work! EAPN Report October 07, available on www.eapn.org

Addressing jointly the 3 dimensions is crucial, as adequate income and access to services pillars are the precondition to access to the labour market. **Active inclusion should rather seen as a triangle, adequate income and access to services being at the base of it , with employment/social activation at the top.**

- **The ambition to impact on the definition of other relevant policies.**

The active inclusion paradigm touches upon various policies other than social policies, and is meant to have an influence on the design of policies related to employment, taxes, services...in line with social needs. We read this as a valuable change of perspective at a time when, in the current Lisbon strategy, we too often regret that a narrow macro-economic approach dictates the terms of employment and social policies (mainly expecting that social policies contribute to raising the employment rate so that the pension system balance can be upheld and social protection costs restrained). This ambition is in line with EAPN repeated calls for strengthening the social dimension of the Lisbon strategy.

- **Central responsibility given to employment policies in the fight against social exclusion.**

We have often expressed criticism re the lack of mainstreaming of social objectives into employment policies. We read this communication as clearly re-stating that employment has a key role in creating a cohesive society, and that employment policy must aim at the implementation of an inclusive labour market.

We welcome also the fact that the Commission proposal, refers to **reintegration into society as well as into the labour market**. It is crucial that Active Inclusion is also designed for people for whom work is not a realistic option.

- **A renewed focus on adequate minimum income.**

EAPN has been strongly raising the issue of access to decent income in recent years, highly concerned by increasing conditionality and sanctions attached to benefits for the unemployed, and increasing inadequacy, which a large number of people are forced to live on in the EU, in terms of human dignity. This is the focus of [our current campaign "Adequate Minimum Income: Everybody deserves a decent life"](#). We very much welcome therefore the focus given to 'Income support' as one of the three pillars of the proposal. Indeed we agree that the words of the 1992 Recommendation remain valid, notably since they encompass the notion of 'right' and refer to 'human dignity'. These do indeed need to be re-stated, and stronger instruments put in place for ensuring that they become reality for people confronted each day with indecent living conditions.

In Germany in 2003 the possibilities of accessing social benefits for elderly people and people not in a position to work have been improved. Notably, better information is being given, and, important enough, the children of the elderly have been relieved of their obligation to pay back these benefits. Even if the

level of these minimum incomes is not adequate, this represents a step toward the recognition of the right to income attached to the person.

France experiments with the “Revenu Social d’Activité”, providing a social income level which is not only linked to the composition of the household but which also complements income from employment, in an attempt to fight in-work poverty and develop adequacy of income.

- **Services as a relevant third pillar.**

Indeed purchasing power and living standards cannot be detached from the services available, and we welcome the reference made to the importance of insuring access to affordable, quality ‘services of general interest, including network industries such as transport and public utilities as well as financial services.

We welcome the importance given to social services as well as acknowledging that people in poverty experience the need for personalised support integration activities as well as access to decent housing and other social services.

- **A support to participation.**

EAPN has been strongly active in the OMC on SISP, trying to make it deliver at its best. We are among the stakeholders of the Active Inclusion strategy, and are convinced of the need for the ‘participation and integration of all relevant actors’ to make it deliver on the ground.

In particular we value the mention that ‘disadvantaged person themselves must be involved, consulted and empowered in order to improve the effectiveness of public policies’. In this perspective, civil society organizations have a key role to play.

2. For a powerful active inclusion approach, based on fundamental rights: EAPN recommendations for a strengthened strategy.

Although we support Active Inclusion, we are also concerned that it may not be implemented consistently, and that a 'work first' approach that we see dominant in the EU would lead to a tendency to forget about the very needs of the most excluded. We ask therefore that the Commission Recommendation which is to be adopted to 'promote the identification and adoption of common principles and to detail the elements of the strategy' is **strengthened according to the recommendations below**.

Knowing that a set of principles agreed in Brussels can be implemented in extremely varied ways under the national and local realities, we also insist that the Commission should play a key role in fostering the development of a clear and consistent commonly-agreed vision, by means of guidance, reviews and exchanges, monitoring and evaluation with specific recommendations or key challenges on areas for Members States to improve, likely to underpin an implementation of the Principles delivering against poverty.

In order to be fully comprehensive and effective, we believe that the Active Inclusion approach should be more clearly inspired by **Fundamental rights**, and by the **political choice** of building a society based on respect for every person. The recommendations below derive from this conviction.

2.1. Active Inclusion as a comprehensive approach based on rights

To highlight the specificity of the active inclusion approach as an integrated approach, proposed common principles should not only be divided into the three strands. An overarching principle is needed, stressing that the three strands are equally important, that adequate income, services and integration support are rights for everyone and **that access to services and adequate income are preconditions** to employment or social integration, , and should be implemented in an coordinated way.

2.2. Income support strand

Some national developments tend to show recognition of the need to increase access and levels of benefits.

In Germany, a new system is in place after the restructuring of Hartz IV, and some 7M people are supported at the poverty line. If the extension of the accessibility of such support is a progress, another reality is that minimum income recipients have largely been left behind by income development. A number of poor families cannot bear the cost of education for their children, a situation partly addressed by the private foundations being set up.

In Austria there has been an increase in funds for social security and poverty reduction by a total of 1.2 million by 2010, a means-tested income is being introduced and unemployment insurance expanded to cover social protection. The monthly minimum wage pension is being raised to 726 euros a year (14 times), and a minimum wage is to be introduced. EAPN Austria sees these policies as the first step in taking the social dimension into account stronger – but “there is still a lot of work and expertise necessary to make it an integrated approach.”

In Ireland specific measures are being promoted to support welfare needs of the older people.

France is experiencing a new minimum income scheme (‘Revenu de solidarité active - RSA’), likely to complementing income from work to avoid in-work poverty.

But other national networks see on the contrary steps back in these areas of benefits: “They mostly aim to reduce social costs and diminish the income redistributed to poorer people (...) family allocations are no longer index linked so they no longer increase with the cost of living”, says EAPN Luxembourg. EAPN Sweden witnesses “more limited rights to unemployment and sick leave assistance”.

“Adequate incomes are the clean water of active inclusion policies”². EAPN is convinced that poverty can only be eradicated if adequate income is the basis of social policies, ensuring the prevention of poverty and social exclusion, and making it possible to build our society on respect. We are aware that such a vision is not widely shared, we witness right to benefits being under attack in some countries, and overall negative approaches to social benefits being developed. In its campaign ‘[Adequate minimum Income. Every body deserves a decent life](#)’ launched last December, EAPN is providing a set of arguments to a wider public demonstrating the crucial need to develop adequate minimum income in the EU, in the interest of the poor themselves, but also in the interest of every member of the society. We expect the Active Inclusion strategy to promote a positive approach to adequate minimum incomes.

The principles should clearly include the following points:

- The **notion of right** should be clearly attached to the development of adequate Minimum Income schemes in EU countries, and the provision of such income detached from the person’s employment status.

If the integration of the management of social benefits and activation schemes can usefully support integrated approaches, as well as set up the ‘one-stop shop’ people in difficulty are needing, income provision schemes on the one hand, and policies aiming at the integration of people on the labour market on the other, should be kept distinct.

- The development of adequate minimum income schemes should be **ambitious**, and really pave the way of a continuous process towards allowing a decent life for all.

² John Veit-Wilson, University of Newcastle upon Tyne, England. “Active inclusion requires adequate incomes: the role of minimum income standards’, intervention at the Round Table on Poverty and Social Exclusion, Azores, Portugal, October 2007.

- Their **adequacy** in relation to the whole society should be checked with the people concerned, and by the development of participative indicators assessing scenarios based on real incomes and the average real price of normal services and goods.

- It should be considered as a first step in the **elaboration and agreement of social standards in the EU**. In the framework of a trans-national exchange EU funded project, a variety of partners have agreed on a common approach to social standards at EU level best seen as a process of dialogue involving the European Union, Member States, people experiencing poverty, social researchers and the general public to agree on 'sets' of essential goods and services needed in each Member State for a dignified life there, and complementary programmes and actions at all the appropriate levels to ensure that everyone has access to such 'sets' (see <http://www.eapn.ie/standards/>). This approach should be used as a reference and inspire concrete implementation.

2.3. Link to the labour markets strand

- **If we want inclusive labour markets to be implemented, Active Inclusion should foster progress** regarding a wide variety of aspects of the current labour market, to come closer to the needs of people experiencing social exclusion and poverty, notably:

- the provision of jobs, including jobs matching the capacities and expectations of people excluded
- the development in the quality of jobs (including guaranteeing social standards at EU level in terms of working time, security at work... as well as fighting against in-work poverty and ensuring secure contracts, high level of social protection, decent levels of wages), including quality part-time jobs...
- antidiscrimination and gender equality
- the integration of migrants, including undocumented migrants
- the development of a flexibility matching the needs of employees in terms of care responsibility, work life balance, and personal support needs,
- the development of services supporting vulnerable people back in employment (for instance services supporting social entrepreneurship, information services, support for disabled workers, support in terms of quality care for dependants, support to mobility...)
- access to quality life long learning, for people in and out of employment, matching their needs and capacities, and supporting the development of social as well as employment related competences.
- Validation of formal and informal learning and recognition of personal experience
- in the context of the implementation of flexicurity principles, strong social protection insured for all, whether inside or outside of paid employment, and in the long term.

- EAPN has already expressed its detailed views in relation to flexicurity (see [EAPN response to the Commission Communication on flexicurity](#)). We believe that inclusive labour markets can only be delivered if at local or regional level all stakeholders take part in a partnership debate and action. Progress under these headings should be comprehensively monitored under the EES.

- **Active Inclusion should open various opportunities for all and at all stages.**

We value the Commission proposal of **personalised action plans** (4.2, § 1) as an active and preventive labour market measure, and we would insist on the full implementation of the notion of personalisation.

Firstly it is crucial that it means **personalised plans for all**: policies should not cream off people most likely to engage rapidly in paid work, leaving others behind. Support and integrative activities should be available for the ones who need them, as long as they need them, by policies secured on a long term and not regularly shifted according to electoral cycles. It should start from the needs of the person, building confidence and providing a pathway approach into “meaningful activity”, greater social activation which may or may not lead to employment but which will progress people along the path of greater engagement with their communities, capacity and competence building.

Secondly it should include the acknowledgment of the full **right of the people to capacity building**, and prevent that they are clustered in a fixed way early on (employable/not employable), rather than keeping it possible for them to access diverse types of opportunities such as professional training or subsidized employment in social economy at various stages in their life, even if at some period they drifted far away from the labour market.

- **Positive activation respectful of the ‘socially rational’ person.**

We do not subscribe to the way the question of the ‘review of the incentives and disincentives resulting from tax and benefit systems’ (4.2; §2) is presented. In reality the two goals of **‘alleviating poverty’ and ‘increasing labour supply incentives’ are not as contradictory as suggested**. Experience shows that disincentives – benefits sanctions - are neither relevant nor effective when it comes to the integration of people suffering from exclusion. The ‘make work pay’ approach referred to here is based on the assumption that people are ‘economically’ rational, implying that nobody wants to work and can only be forced to work through financial motivation. People are also under the influence of more complex psychological social difficulties and motivations. In reality high and secure social protection contributes to the confidence and availability people need to follow pathways to integration. Moreover, the punitive approach increasingly developed in various countries, where compulsion and sanctions are attached to benefits in relation to people’s behaviour on the labour market, is not only ineffective but also disregards human dignity. It only ends up in pushing further people into poverty. This appears to be particularly in contradiction with the Commission’s priority given to fight child poverty.

EAPN Danish network pointed out the negative effects of activation without enough support for the most vulnerable: "The level and length of social benefits is decreased for specific weaker groups who beforehand lack education and are living excluded from the labour market as well as socially. The idea that cutting benefits will motivate people for work, is a presumption but until now there has been limited documentation of the real effect. Politically there is a clear expression of support for vulnerable groups, and at the same time there is a restriction in economic resources to benefits, expenditure for rehabilitation, sheltered jobs etc";

Other studies demonstrate the effectiveness of voluntary approaches which start with realistic expectations and targeted continuous support (eg with lone –parent families – Study by the National council of One Parent Families 2007).

▪ We agree with the Communication that 'relevant policies are needed on **the demand side of the labour market**' (4.2 §3). We welcome notably the references to "expansion of the social economy". However what kind of social economy should be supported and how. (see EAPN Position paper [Social economy as a positive force for employment and social inclusion](#) (EAPN, September 07).. We welcome also the call for the "development of new sources of jobs in response to collective needs", as well as "antidiscrimination law and labour law". We are **more sceptical about the reference to "financial incentives for employers to hire"**, which are too often not effective enough. The downsides of subsidising employers are various: carousel effect – short terms contracts being developed in line with the duration of the subsidy; substitution of one vulnerable group for another in line with rules attached to the subsidies....Too often the level of responsibility undertaken by enterprises in terms of sustainable integration is not sufficient. Public budgets should instead make a decisive effort towards investing in people.

EAPN Ireland stresses that labour market schemes which support unemployed people to take part in work placements need to be reviewed to ensure that employers are not exploiting the opportunity to the disadvantage of the person on placement.. Direct and indirect discrimination against people from particular social groups is one of the greatest barriers to members of these groups accessing employment. Employers need to be required to show how they are taking positive measures to ensure equality and non-discrimination in their employment practices and workplaces. "³

³ EAPN Ireland response to the Communication available on www.eapn.ie

2.3. Accessibility and quality of services

▪ We value the acknowledgement of the importance of the role all services of general interest including network industries play for social cohesion. EU action is vital to ensure an adequate balance between social rights and market freedoms, to clarify Member States role and responsibilities and the limits of internal market and competition rules and **to ensure that the voice of users, particularly the poor and socially excluded, is heard**. In preparation of the Spring summit, a draft 'key issues' paper elaborated by the Slovenian presidency, the Economic Policy Committee and Economic and Finance Committee, calls for action at EU level on "the internal market as a means of improving citizen's quality of life". We think that such an objective will not be attained unless social objectives are seriously mainstreamed in internal market policies, and **evidence gathered regarding the real impact of market liberalisation on the lives of people, especially on the most vulnerable**.

▪ We insist that the **social impact of development of the internal market through social impact assessment and independent horizontal evaluation** and that the EU ensures that quality affordable services of general interest are accessible for all, and resist the development of two tier approaches to services. This should include a revision of the terms of references of the national and EU regulators, ensuring that these bodies act as effective independent watchdogs on accessibility and quality, particularly for low-income users. Clarification is needed of the scope of the protocol on SGEI in the Lisbon Treaty and commitment made to the development of further horizontal instruments to affirm the supremacy of the universal principles of services of general interest over the interests of the internal market, should the two come into conflict.

▪ Within services of general interest, the Commission has recognized that social services play a specific role in "fulfilling basic EU objectives such as the achievement of social, economic and territorial cohesion, a high level of employment, social inclusion and economic growth, as well as their close interconnection with local realities"⁴ Although poor people are often the most in need of such services, social services need to be affirmed as a fundamental right, best delivered through the provision of universal services, to ensure that "Services for the poor don't mean poor services"⁵. Specific measures however must be taken to ensure access for all to affordable, quality social services delivered locally responding to user's needs. Whilst the new Communication highlights a strategy for supporting the quality of social services across the EU through the OMC SPSI developing a voluntary quality framework and the clarification of legal problems with EU competition and internal market law over the provision of social services through the new interactive information service, we would underline the need to see this as only a first step in the move towards the agreement of common social standards which can guarantee the adequacy of these services as a fundamental right. Progress must also be made on ensuring the

⁴ Communication: Services of General Interest, including social services of general interest, a new European Commitment . COM (2007) 725. (20.11.07 p.7)

⁵ EAPN Light Year Report 2007.

participation of user's, people experiencing poverty, in the development and monitoring of the delivery of these standards.

- **Access to education and life long learning** is central to integration in society and the labour market, and we face huge needs regarding the needs of people in poverty and social exclusion.

- We subscribe to the list of **criteria for quality** used in the Communication (4.3), with the addition of the following elements regarding services to the person:

- flexibility and relevance to individualised needs;
- quickly responsive to a problem faced, so that other and more problems are prevented;
- security, ie available as a right in the long term;
- generous in terms of level and quality of support given.

3. How can this work? Further proposals for participative governance and integrated processes for active inclusion.

The Commission proposal includes the adoption of common principles and a supportive framework for Active Inclusion. We believe this is a minimal requirement that should be complemented if we want Active Inclusion to be a powerful driver for social inclusion.

- **Strengthening the OMC needs to build on work done and pursue a reflection on more binding instruments.**

We welcome this relevant aim of strengthening the Open Method of Coordination. In order for this reinforcement to build on previous outcomes of the OMC, we believe that:

- Active Inclusion common principles should not substitute the common objectives of the Open Method of Coordination. On this point we would like to refer to Professor Mary Daly's analysis⁶, stressing how the original objectives of the Open Method of Coordination have been narrowed through the 2005 revision. Active Inclusion strategy should not be a step further in this direction of narrowing, but on the contrary an opportunity to renew a broad ambition for the OMC.
- Each strand of Active Inclusion should be individually elaborated at each level in detail, including their interrelation
- The recommendations listed above under the three strands should be taken into account in the elaboration of the common principles
- Active Inclusion principles should be consistently pursued in the framework of the OMC; Member States should be required to set out in the National Strategies for social protection and social inclusion how they will deliver active inclusion according to these principles, which should then be actively monitored each year according to an active inclusion scoreboard. Independent Experts

⁶ Whiter EU Social Policy ? AN Account and assessment of developments in the Lisbon Social Inclusion Process, Jnl Soc.pol., 37, 1, 1-19, Cambridge University Press.

should appraise the reports and a benchmarking system established, with proposals for change or recommendations. Apart from exchange of good practice on key elements as well as integrated approaches, a Peer Reviews should focus on more controversial aspects ie how far do activation approaches support social inclusion? How far do minimum income schemes provide adequate income/purchasing power for normal goods and services?

- There is also a need for more transparency, more public exchange and debate. Member States should make proposals as to how the concept of active inclusion will be promoted, and arrangements made at EU level to promote wide stakeholder debate on the outcomes.
- Detailed guidance should be given to Member States for the implementation of Active Inclusion according to these recommendations (this guidance should complement the guidance note circulated in view of the preparation of the next round of NAPs under the SISP strategy, which have been issued before the common principles)
- Beyond the adoption of common principles, the Open Method of Coordination should reflect on further steps in strengthening the EU action against poverty, including more binding instruments such as a Directive.

- **Beyond the OMC: foster consistency between the various processes impacting on social inclusion.**

Active Inclusion strategy will mean wasted efforts if it is to be initiated in a contrary bigger picture. At the moment, despite relevant references made in the rationales of the Commission Proposal for the next round of Employment Guidelines, social concerns are not high enough in the Lisbon agenda and that the adoption of Active Inclusion should go together with adapting the direction of the Lisbon strategy (see EAPN Press release "[Growth and Jobs are not delivering social inclusion!](#)" EAPN , January 2008). Specific monitoring of the Active Inclusion principles should be embedded in the National Reform Programme reporting procedure and as a key element of evaluation.

Member States in their implementation of flexicurity pathways at national level should pay consistent and particular attention to the articulation between active inclusion and flexicurity. The following criteria should be followed by Member States and reviewed under the European Employment Strategy:

- social impact of labour market reforms
- extent to which new flexibility matches needs expressed by employees, as well as by the social economy sector
- development of adequate security provisions in line with past and current flexibility developments
- participation of people faced with exclusion from the labour market regarding the shaping and the implementation of flexicurity.

- **Further guidance to be developed upon participation and integration of all actors.**

The EU should give precise guidance through the Open Method of Coordination to ensure qualitative participation of people experiencing poverty and the organizations representing their interests, not only in the implementation, but also in the shaping of active inclusion policies from the start. All tools of the OMC (including Guidance notes, Commission reviews of the National Action Plans, Peer reviews...) should be converging to push for a more demanding approach of participation. Criteria for quality participation can be drafted from the outcomes of the 2007 Peer Review seminar as well as from the experience of the European Meetings of People Experiencing Poverty. (See also [EAPN comments on the draft guidance document for preparing National Reports on Strategies for Social Protection and Social Inclusion 2008-2010](#)).

Some positive steps have been developed already in Belgium, where the Accord de Cooperation concernant la lutte contre la pauvreté et l'exclusion sociale en Belgique (1999), has set u,p to the request of organisations, a dynamic on going consultative process with organisations where people in poverty take the floor together with other important actors. In the Flemish region, the Flemish network is officially a privileged partner for discussion with the government since the Flemish Poverty Decree (2003).

Local level:

- The implication and integration of actors at local level is key to the implementation of Active Inclusion.

We find the idea of the 'establishment of a network of local observatories ' highly interesting, as it reflects the will to increase support to local implementation of Active Inclusion. Local observatories can not only support the local implementation of active inclusion projects, but also raise the participation and co-responsibility of different stakeholders in the activation and inclusion processes. These observatories can be an important tool for understanding why some activation policies are not working with different publics and for proposing and providing new approaches to these publics. NGOs and local grass-roots organizations should be involved as active partners in the local observatories, and "research-action" approaches should be developed, with the participation of all actors, particularly those experiencing poverty and organizations representing their interests.

Some EAPN members are engaged in the setting up and the running of such observatories. The EU should foster visibility and support given to such existing experiences. We welcome the proposal from the Commission for a partnership with EU networks of NGOs regarding the establishment of a network of local observatories, and we look forward to participate in further discussions about this project.

- Sharing good practices should also be complemented by the development of **local/regional National Action Plans on SISP**. Member States should commit to supporting the establishment of such local frameworks. The OMC on SISP should as a priority review such developments.
- The competency of staff in charge of the implementation of the three strands should be considered important and reinforced through relevant training and management at local level.

EU Financial instruments:

- We have been calling repeatedly for the European Structural Funds to support social inclusion, and welcome the proposal that the Commission will ‘encourage’ use of the provision of the new ESF regulation to support active inclusion measures. We ask that such support is also given to projects supporting the social integration of people for whom paid employment is not an option, according to the notion of active inclusion.
- EAPN therefore calls on the European Commission to actively support the setting up of new transnational projects on active inclusion, as part of the “mainstreaming of EQUAL” into the new European Social Fund, by:
 - clearly identifying “active inclusion” as relevant thematic focus
 - providing Member States with specific guidance targeted information on the opportunity of such programmes
 - putting in place the right tools for partner search
 - actively involving civil society in that process.
- We ask that such support is also given to projects supporting the social integration of people for whom paid employment is not an option, according to the notion of active inclusion. We therefore call on the European Commission and Member States to ensure that the management, reporting and evaluation of ESF programmes puts a clear focus on active inclusion, developing integrated approaches to labour market integration of excluded groups. This could take the form of specific ongoing evaluations (replacing former mid-term evaluations) to be carried out on the issue.

Public opinion:

- **Beyond the mobilization of stakeholders, the mobilization of public opinion is also crucial for ensuring the investment and the positive approach needed for Active Inclusion.**

In France the government has initiated a large multipartite review of inclusion policies over the first semester 08. This only can have a positive impact if public opinion is informed and mobilized. This can only be facilitated by highlights given to social concerns at EU level.

EAPN will be supportive of this initiative. We will continue our lobbying started by our Minimum Income Campaign, calling on Member States to support this initiative, to be ready to seriously implement it, and open to making it a participative policy.