



COMMUNITY PLATFORM  
CHALLENGING POVERTY & INEQUALITY



## **EAPN Ireland and Community Platform comments on the Draft Human Capital Investment (ESF) Operational Programme 2007-2013**

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EAPN Ireland and the Community Platform welcome the opportunity to comment on the Draft Human Capital Investment (ESF) Operational Programme 2007-2013. The Structural Funds in general and the ESF in particular provide an important opportunity to address issues of poverty and social exclusion. As pointed out in the draft, the ESF OP from 2007-2013 is particularly significant in that while it must play a role alongside the NDP to address issues of social exclusion in relation to employment and human resources it is a stand alone programme with a total budget of €1.5 billion.

### **Chapter 2: Economic and Labour Market Overview**

The overall analysis and particularly Section 2.8 on productivity needs to recognise the reality that 7% of those at work are at risk of poverty (Eurostat and CSO, 2005) and that a job alone without addressing other factors will not address poverty.

The focus of education and training measures on those in employment with low skill and on low income is important. However, it is important that the type of training provided also address issues of personal development and not just labour market up-skilling. Migrant workers also need to be targeted for inclusion and not solely in terms of language support, which is important but will not address other areas of need such as skills development, exploitation etc.

We want to particularly comment on section 2.9 Groups *Experiencing Low Employment Rates*. This section highlights two key factors influencing lower employment rates for particular groups. There are a number of other key factors which need to be considered. Some of these are highlighted in the NESC 2005 Report on the Developmental Welfare State and in the European Commission's 2006 Communication on the *Active Inclusion of people Furthest from the Labour Market*. These factors include issues of income (including poverty traps), access to adequate services such as childcare, lifelong learning and active labour market supports including the role of employment services. Barriers vary considerably across different groups and measures to address them must reflect this but many also experience common barriers at a structural level.

We are pleased to see the priority given to the issue of discrimination. This is a significant factor, highlighted through the ESF EQUAL Community Initiative, but which is not adequately named or addressed in a number of key Government policy documents such as Towards 2016 and the National Reform Programme 2005-2008. We recommend that this be addressed in the coming period and the measures and their impact are reported in the NRP implementation reports. Measures to address discrimination require not only awareness measures but the existence of strong and enforceable

equality legislation. The EQUAL Community Initiative has provided innovative approaches to addressing discrimination, including measures to engage employers. Some of these approaches should be mainstreamed.

Comments here in relation to factors influencing lower employment rates are also relevant to the issues identified in section 2.10.3 as internal weaknesses of the Irish labour market.

### **Chapter 3: Strategic Context for Investment Priorities**

Section 3.2 outlines the EU's Joint Employment regulations 2004/2005. The issues outlined here for Ireland are significant. It is also important to recognise the comments made by the European Commission in December 2006 on Ireland's implementation of its National Reform Programme. This report repeats many of the issues raised previously but also highlights that Ireland needs to develop and implement measures which positively address the wider social and economic integration of migrants.

Section 3.7 on the National Action Plan for Social Inclusion 2007-2016 highlights that a lifecycle approach adopted in various policy areas will reflect a focus on the individual more than on vulnerable groups. While a focus on the individual is important in terms of the provision of certain specific supports it is essential that measures and policies to tackle social exclusion also continue to identify and address the common structural inequalities experienced by marginalised or vulnerable groups.

### **Chapter 4: Priority areas for Co-Funding**

We agree that the two priorities outlined in the Draft Programme are important. These are:

- i. Upskilling the workforce and
- ii. Activation and Participation of Groups outside the Labour Force.

However we also believe that there is a great need to continue to address the needs and barriers of those who are unemployed.

Tackling barriers for the groups identified in Chapter 4 is important, however, we wish to express our concern at the overall approach which does not attempt to outline with any clarity what is planned and does not directly relate back to the issues identified in the overview in Chapter 2 and also in the scope of assistance outlined in Article 3 of the ESF Regulation. In some cases the named areas could potentially result in all or the majority of the resources going into existing Government Programmes and not providing added value e.g. Youthreach, Senior Traveller Training Centres and the 550 language teachers already committed under the NDP 2007-2013. This potentially undermines the focus on innovation highlighted in 4.7.

The priority areas need to be more clearly outlined. While recognising that different groups experience different barriers and require targeted responses, some barriers such as discrimination, are experienced by different groups and common approaches to addressing these need to be developed. Issues in relation to discrimination etc are spelt out in Chapter 2 of the Draft but strangely discrimination does not appear as a priority area for co-funding. Discrimination is also a key issue outlined in ESF Article 3.1.c.

A number of groups such as lone parents and older people are not named under priority areas for co-funding although they experience particular barriers in relation to the labour market. For other groups such as Travellers, early school leavers and immigrants the policy or programme areas highlighted do not adequately address the key barriers faced by these groups. Towards 2016 includes

a number of specific commitments particularly in relation to older people and people with disabilities which need to be considered. Article 3 of the ESF Regulation also names a number of these groups.

Activation: While activation is named as a priority there is little strategic relationship with the current focus on activation even though it will provide a major context for the Government's approach to addressing the labour market participation of groups at a distance from the labour market. As outlined above some of the groups named in current Government activation policy are not named in chapter 4 e.g. older people and lone parents. Key elements of an activation policy need to address:

- i. active labour market supports and how employment services are delivered
- ii. measures to address income and poverty traps and
- iii. access to adequate and appropriate services such as childcare.

This is alongside access to appropriate training and education or lifelong learning opportunities covered to some extent under section 4.3.4 of the draft plan. These areas fall within the scope for assistance outlined under Article 3 of the ESF Regulation.

Entrepreneurship: As highlighted in section 3.2.2 the Community Strategic Guidelines highlight the importance of attracting people into jobs/employment *and entrepreneurial activity*. The priorities as outlined fail to address this area. Access to entrepreneurial activity is an important route to a job for members of marginalised groups. This needs to be addressed in the ESF Programme. It also needs to be reflected in Ireland's National Reform Programme, the Regional Operational Programmes 2007-2013 and the NDP which address the issue of entrepreneurship but not from the perspective of how it can be more accessible for marginalised groups. A number of projects under the Entrepreneurship strand of the EQUAL Community Initiative in Ireland have developed innovative approaches to support marginalised groups to access entrepreneurship. They projects also identified major barriers and have made proposals for addressing these. The ESF programme could continue to address this issue including a focus on mainstream entrepreneurial supports and programmes.

Industrial Restructuring: This is a large area which could consume a large budget and the specific social inclusion element is not identified. It is not clear how this is to be addressed or why it is included.

Interregional and Transnational Co-operation: This is an important element within the overall programme and has the capacity to bring broader experience and learning.

Contribution of priorities to innovation and Mainstreaming: This could also be an important element of the overall ESF programme. However, it must be linked closely to improving mainstream programmes and policy. Previous programmes and initiatives, particularly those highlighted as innovative, have suffered from lack of mainstreaming even when they have been proven to be successful. The EQUAL Community Initiative has attempted to address this by making mainstreaming a principle and core element but has still struggled to make it a reality. Learning from past experience needs to be implemented in this and current ESF Programmes. There should therefore be the potential to look at how existing innovative projects can be mainstreamed to address some of the barriers identified.

Employers: In order to adequately address issues such as discrimination, quality of work, work-life balance, lifelong learning etc it is essential to actively engage employers as key stakeholders and also places of employment as places where change has to take place. The programme needs to address this.

## **Other Issues**

### **Budget**

The budget of €1.5 billion (section 8.1) is welcome and well above that required to match the ESF contribution of €375 million. However, the table on page 67 of the draft only outlines the breakdown of ESF expenditure over the 2007-2013 period. It is important that the breakdown of the total budget is provided in order to understand the overall balance between priorities and years. In general, while appreciating the value of flexibility in expenditure, there is a need for a much more detailed indication of expenditure within priorities, at least in percentage terms, as not all actions outlined have the same impact in relation to social inclusion but could potentially consume a high percentage of the overall budget e.g. Industrial Restructuring (Section 4.5)

### **Monitoring**

In terms of the composition of the Monitoring Committee the term '*as appropriate*' in sections 7.5.2. and 7.10 in relation to Social Partnership Groups needs to be clarified. The Monitoring Committee would be strengthened by the inclusion of representatives of those groups named as experiencing social exclusion or outside the labour market. Article 11 of the Structural Fund General Regulation on partnership states that representatives from civil society, non-governmental organisations and bodies responsible for promoting equality between men and women should be involved at all stages of the structural funds process, including monitoring. It is essential that this is respected.

### **Reporting**

ESF Regulation Article 6 outlines some of the essential elements which must be reflected in the Annual and Final implementation reports. These are not reflected in the draft OP which pays more attention to financial reporting. It is essential reporting pays great attention to impact of the programmes.

### **Consultation**

While the opportunity to comment on the OP is welcome the consultation process was carried out in a way which did not provide adequate opportunity for the voices of those experiencing poverty and social exclusion to be reflected.

### **Participation in programme implementation**

The participation of organisations representing those experiencing poverty and social exclusion at all stages of the process is essential. This is stated in Article 11 of the General Regulation. Article 5 of the ESF Regulation is specific in relation to participation in implementation and states that "*the managing authority of each operational programme shall encourage adequate participation of the social partners in actions funded under Article 3*". Therefore, it is critical that the ESF OP clearly outlines how community organisations can access resources and participate in the implementation of actions. This should be on an equal basis to other stakeholders.

### **Horizontal Issues**

In order for gender equality, equal opportunities across all grounds under equality legislation and social inclusion to be mainstreamed across the Programme it is essential to put in place the monitoring mechanisms to ensure this takes place. The equality proofing process across all labour market programmes outlined in section 4.4.9 is an important element in this regard. This should include the development of indicators.

Poverty proofing is Government policy and needs to be carried out and impact on the design of the OP. These need to be more clearly outlined in the OP and be based on building on lessons from the 2000-2007 period.

These proofing processes need to be ongoing and actively involve groups experiencing poverty and social exclusion.