

Barometer Report

Monitoring the implementation of the (at least) 20% of the European Social Fund that should be devoted to the fight against Poverty during the period 2014-2020

March 2016

MONITORING THE IMPLEMENTATION OF THE (AT LEAST) 20% OF THE EUROPEAN SOCIAL FUND EARMARKED FOR POVERTY

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INTRODUCTION

A step forward on tackling poverty and promoting participation?

The new programming period of ESF (2014-2020) appears to mark a major step forward in relation to the spending of EU funds for poverty and participation. **Structural Funds for the programming period 2014-2020 will amount to 352 € billion.** ESF under the new regulations get at least 23.1% of national Structural Funds allocation, with spending closer to 25% and gives a higher profile to social inclusion and poverty reduction with at least 20% of ESF earmarked¹. A strengthened partnership approach has also been supported including the involvement of NGOs through the first [European Code of Conduct on partnership](#).² For the first time the ESF national budgets are secured, with the mandatory minimum of 23.1% of the total SF national allocation. The Fund for the most deprived (FEAD) also extended its scope of intervention for broader social inclusion activities, however it is not meant to overlap with ESF.³ (Please see more detailed information and links on the new fund in the [EAPN Tool Kit](#) which includes contact details of managing authorities and a glossary of key terms.)

With a stronger focus on social inclusion and poverty reduction, and a better promotion of bottom-up and community-led approaches, the European Structural and Investment Funds (ESIF) Regulations⁴ 2014-2020 also provide a more favourable legal framework for more funding opportunities for social NGO's and to support positive anti-poverty policy and practice. The Ex-ante conditionalities in the Regulations provide very specific requirements around funding priorities and delivery through the Operational Programmes, ie on poverty reduction, based on integrated anti-poverty strategy. The Guidance Note on Ex ante Conditionalities for the European Structural and Investment Funds PART II (February 2014)⁵ produced by the European Commission provides a valuable point of reference when reviewing the delivery on poverty of the funds on the content and the process. *"This guidance is addressed to geographical units for ESI Funds. Its purpose is to provide a framework for the assessment by the Commission of the consistency and adequacy of the information provided by Member States on the applicability and fulfillment of ex ante conditionalities. It is also made available to Member States"*⁶.

In terms of the current EU context, this report comes also at an important moment, following the adoption of the Partnership Agreements and Operational Programmes in 2014-5, and the Commission's initial Report adopted in December 2015 – which endorses particularly the ex-ante conditionalities and partnership principle.⁷ It is hoped the recommendations from the report will feed into the Mid-Term Review of Structural Funds that will take place later in 2016 led by Directorate General Regional Policy (DG REGIO).

EAPN actively contributed to the achievement of the earmarking and partnership principle, through its EU Money for Poverty campaign coordinated with 19 European NGOs.⁸ This report therefore comes at a timely moment for NGOs to assess progress made on the promises on poverty and participation.

¹ Art. 4.2. ESF Regulation

² Art. 5 CPR.

³ MS can choose between two types of Operational Programmes: OP1 for food aid or material assistance, and OP 2 is broader pathways to social inclusion.

⁴ Available: http://ec.europa.eu/regional_policy/en/information/legislation/regulations/

⁵ Available: http://ec.europa.eu/regional_policy/en/information/legislation/guidance/

⁶ Available: http://ec.europa.eu/regional_policy/en/information/legislation/guidance/

⁷ Available: http://ec.europa.eu/contracts_grants/pdf/esif/invest-progr-investing-job-growth-report_en.pdf

⁸ See [here](#) for more details. The EU Money for Poverty campaign collected over 12.500 signatures in a petition in support of the Commission's Regulation proposal.

Aims and Objectives

The aim of this report is to carry out an initial monitoring of:

- 1) The implementation of the 20% earmarking of ESF on social inclusion and poverty reduction, in terms of spending, quality of delivery and impact;
- 2) The quality of the delivery on partnership with civil society, monitoring the code of conduct on partnership, and as partners in delivery.

Methodology

An EAPN Policy Task Force was set up by EAPN's main policy group (EU Inclusion Strategies Group (EUISG)) in 2015 to develop instruments to help EAPN monitor the use of the new Structural Funds, (European Structural and Investment Funds (ESIF) – (2014-2020) and particularly the European Social Fund (ESF).

The Task Force was led by EAPN Portugal with support from EAPN secretariat, and involved EAPN Germany, Spain, Romania, Bulgaria, Estonia. The Task Force met three times between May and December 2015 based on an agreed terms of reference. The initial findings were discussed with the broader EU Inclusion Strategies group in October 2015 and then presented to an EU-level Stakeholders Group in December

In order to collect all the information from different countries and different experiences on the use of ESF, it was decided by the Task Force to develop a single questionnaire to collect quantitative and more detailed qualitative information on the content and the process, including good practices or even new projects funded under the new cycle. EAPN Networks were asked to complete the questionnaire and return it to EAPN Portugal. In the questionnaire the scale adopted was 1 to 6, considering one as none (1) and six as full adopted/considered (6).

The **Task Force and EUISG national members** were responsible for completing the questionnaire, but the involvement of the EXCO (Board) member and other stakeholders of the network was also encouraged who have experience in the wider range of strategies and plans which are supposed to underpin the programmes, particularly with reference to the ex-ante conditionalities.

The **source of data** for this first year was drawn primarily from the [Partnership Agreements](#) and the [ESF Operational Programmes](#) for each country.

The questionnaire is divided into two parts:

- **Part 1)** assessing participation and partnership (e.g in the Monitoring Committees and in developing the Partnership Agreements (PA) and the Operational Programmes (OPs).
- **Part 2)** is dedicated to analysing the delivery on the 20% ear-marking for promoting social inclusion and combating poverty in the PA and OPs.

Detail on the Questionnaire

In the first part on partnership, the analysis is based on four themes and in the second part on delivery on the 20%, there are twelve.

In the **first part** the themes are quality of participation and engagement in:

- Code of conduct on partnership
- Partnership agreement
- Operational programmes
- Monitoring committees

In the **second part** on monitoring delivery on the 20% of ESF, the themes are:

- Overall assessment of spending of 20% of ESF on social inclusion and poverty reduction
- Promoting Active inclusion
- Integration of marginalised Roma communities

- Integration of other marginalized groups (migrants, including undocumented, other ethnic minorities, traffic human being victims, asylum seekers, homeless, others,...)
- Access to health and social services of general interest
- Promoting access to sustainable and quality employment
- Enhancing access to affordable, sustainable high quality services
- Promoting social entrepreneurship/economy and vocational integration in social enterprises
- Community led local development strategies
- Antidiscrimination
- Gender equality
- Disability

SUMMARY OF MAIN FINDINGS

1. Partnership and Participation

More formal agreements but low quality engagement of NGOs

- *Formal application of code of conduct on partnership:* in the majority of MS the code of conduct is in place, at least on paper, however there is generally a very low level of engagement of NGOs and low satisfaction with the quality of the engagement. Positive examples include Germany, Italy, Spain, Romania and Poland. Negative examples, with formal adoption only in Bulgaria, Finland, Portugal and Slovakia.
- *Partnership Agreement:* 9 out of the 16 networks were involved in the drafting of the Partnership Agreement, (Czech Republic, Finland, Germany, Ireland, Italy, Poland, Portugal, Romania, Spain), while 7 were not consulted. However, the quality of the engagement differed strongly. Only 3 confirmed a positive engagement which resulted in impact on the PA (Germany, Poland and Romania). Most said that their input was not taken on board.
- *Operational Programmes:* the same 9 networks confirmed involvement in drafting the Operational Programmes, with 4 specifically consulted (Finland, Germany, Poland and Spain) and 7 invited to a specific meeting to discuss them. 4 confirmed that their inputs were taken on board (Germany, Italy, Poland and Romania). Others highlighted partial take-up eg Spain.
- *Monitoring Committees:* The social sector is represented in all the MC's monitored, but the quality of this participation is strongly contested. 6 out of the 10 national networks participate to some degree (Spain, Romania, Italy, Ireland, Germany and Finland) but only Germany, Romania and Spain score high levels of involvement (5-6), particularly in the design/preparation of calls. Reasons highlighted for non-involvement were lack of access to political decision-making and insufficiently participative mechanisms, as well as NGO's lack of financial resources, information and capacity.

2. Delivering on the 20% earmarking on poverty and social inclusion

At least 20% is being spent, but will it reduce poverty and social exclusion?

- *Over 20% ESF is being spent but concerns raised about implementation:* 14 out of 15 confirmed that at least 20% of ESF was allocated, with 9 confirming that more was spent (Belgium, Bulgaria, Estonia, Germany, Ireland, Italy, Malta, Portugal, Romania). However, the level of satisfaction was generally low, indicating concerns about the quality of the implementation and impact on poverty.
- *Focus on activation with unclear impact for people in poverty:* The main priority for implementation appears to be given to measures promoting only activation, rather than broader active inclusion. Questions are raised on how much of the budget will go directly to empower people experiencing poverty, rather than groups closer to the labour market.
- *National Strategic Frameworks in place but not integrated Active Inclusion:* Although the majority consider that an anti-poverty strategic framework based on integrated active inclusion is technically in place, the average assessment is low. Only Estonia and Poland score highly. Only Bulgaria, Portugal, Poland, Malta and Romania confirm reference to the 3 strands (adequate income support, inclusive labour markets and access to quality services), but the level of satisfaction is low. Often the 1st strand on income support is missing.
- *Stronger delivery of Roma Integration Strategies – Integrated Roma Inclusion strategies* are generally given a more positive assessment, however there is less certainty on how far they cover the full 4 pillars of employment, education, healthcare and housing, with only Belgium, Bulgaria, Germany, Italy, Poland, Portugal and Romania giving a positive validation. Less networks consider that the Partnership Agreement and Operational Programme explicitly implement the Strategy but Bulgaria, Italy, Poland, Portugal, Romania, Slovakia, Spain, score

relatively highly. In Estonia and Germany, Roma is not referred to explicitly, but as part of target groups. 8 out of 15 consider that Roma are actively engaged in the monitoring process.

- *Wide range of target groups with weak implementation:* In general, all countries have some programme/strategy for marginalized groups, in some cases it is an overarching programme, in others the groups are specifically targeted. Key groups are migrants: Belgium, Finland, Germany, Italy, Portugal, Spain; human trafficking – Finland, Italy, Latvia, Portugal, Romania and Spain, or asylum seekers highlighted with specific strategies: Germany, Italy, Portugal and Spain. Homeless are highlighted in Romania, Bulgaria, Finland, Portugal, Spain, Italy and Latvia. Other groups are young unemployed, people with disabilities, single parent, young people. Whilst strategies may be in place, the majority of responses highlight low satisfaction with the implementation.
- *Unequal access to quality health and social services:* Most countries have national or regional strategic frameworks for health in place, with low ratings only from Germany and Latvia. However, most rate below average the quality of the implementation. Most strategies aim to facilitate access to quality health care at affordable prices, but new challenges are highlighted, particularly in restrictions to universal rights to care, and to particular groups eg migrants, or through rising costs raising challenges of access and affordability – eg for elderly, but also rising mental health costs. Members highlighted an increasingly wide range of target groups at risk when accessing to services. Without adequate strategies in place, effective use of EU funds is endangered.
- *Jobs first but not quality employment:* Employment and training is a key focus of most OPs, but the **quality** of the employment is not a priority, with concerns about low wages, precariousness of contracts, an over-focus on activation, and the priority given to economic aims and not to people's needs. There is also a wide variation in target groups being targeted - with the most popular being youth, long-term unemployed, then women, people with disabilities, long-term sick and older people. Ethnic minorities are selected by 6 and migrants by 8. Whilst there are explicit sections in the PAs and OPs to implement the strategies, there is low satisfaction generally with the implementation, except for Spain.
- *CLLD⁹ missing opportunity to deliver on inclusion:* Most networks gave a positive response, with Estonia, Italy and Romania scoring particularly highly. However, there is general agreement that these strategies do not contribute sufficiently to tackling social inclusion. Anti-poverty NGOs are generally not included as partners, and the satisfaction with the actual activities proposed is low. In general, it is seen as a potentially useful, innovative instrument that could deliver territorial partnership approaches to tackle poverty. However, key obstacles remain of legal uncertainty and lack of transparency around project selection and implementation.
- *General ex-ante conditionalities: antidiscrimination, gender equality, disability strategies show wide variation:* Most networks highlight that the different strategies appear to be in place, however, there is great variation in the quality and implementation. The degree of involvement of national networks also varies highly. On antidiscrimination, few networks are involved in the drafting or implementation, only Spain, Portugal and Germany. On Gender, members rate generally more highly the strategies developed and the degree it is mainstreamed into the OPs and Pas. However, few networks are engaged, except for Spain, Germany, Italy, Poland and Portugal. In terms of Disability strategies, there is a wide variation, with well-developed strategies in Portugal, Malta and Estonia, whilst in Germany, Denmark, Slovakia, Latvia, and Romania there are specific measures in the OP but no specific strategy.

⁹ Community Led Local Development. (CLLD)

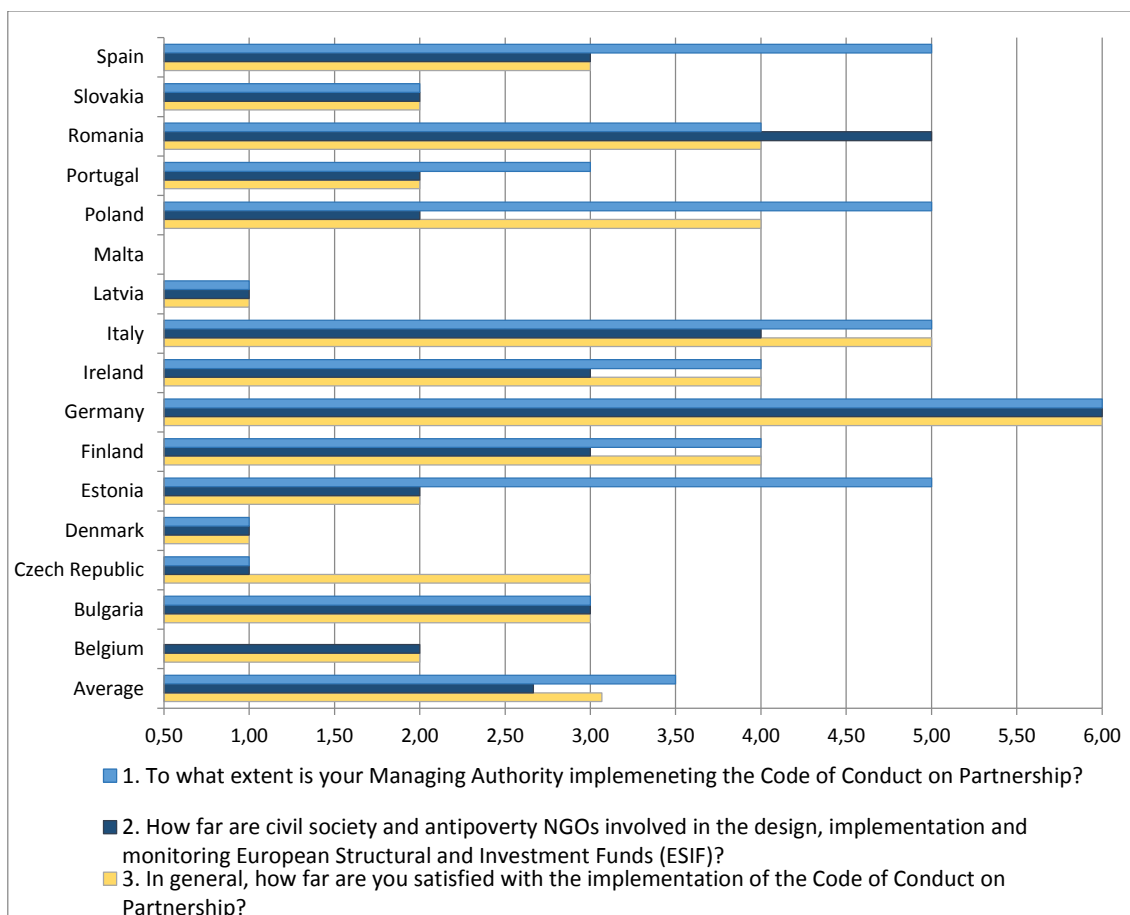
We have received a total of 16 responses from the EAPN National Networks (NN). Three networks sent some comments but did not complete the questionnaire (Sweden, Norway and Netherlands). All the members of the Task Force answered the questionnaire: Portugal, Spain, Germany, Bulgaria, Estonia and Romania. The other Networks that accepted this challenge were: Belgium¹⁰, Czech Republic, Denmark, Finland; Ireland; Italy, Latvia, Malta, Poland and Slovakia.

Section A – Analysing the Partnership Agreements and the Operational Programmes – Participation on Antipoverty and Social NGOs

I - Code of conduct on partnership (CCP)

The aim of the Section A was to understand the scope of the engagement of Anti poverty/social NGOs in the design, delivery and evaluation of the ESF programmes. The first area of analysis is related to the Code of Conduct on Partnership: (CCP) a Commission document establishing a common set of standards to improve consultation, participation and dialogue with partners during the planning, implementation, monitoring and evaluation of projects financed by the ESIF. The questions highlighted the level of implementation of the CCP by the Managing Authority and the involvement of civil society and anti-poverty NGOs, as well as their satisfaction with the process implemented. The following graphic shows the distribution of all the countries that answered these 3 questions:

Graphic 1 – Code of conduct on partnership countries positions



¹⁰ The assessment made by EAPN Belgium was a general one, taking in account the national OP's and also the regional ones.

We had feedback from 15 of the 16 networks. Only Malta did not answer because both Agreement and Call for applications have not been published yet.

Taking in consideration the average, in general it appears that there is a commitment from the Managing Authority to the implementation of the CCP, however this commitment is perceived as not fully implemented. The perception regarding the involvement of NGOs is very low (2,60), as well as the low satisfaction with the implementation of the Code.

Making an analysis by country regarding the involvement of these entities in the design, implementation and monitoring of ESIF, some networks like Latvia, Denmark and Czech Republic expressed the idea that the anti-poverty NGO's were not consulted at all. In Denmark, although a large number of different organisations are involved, the weight of Anti-poverty NGOs is quite low (*"There are 100 institutions, authorities and organisations involved in the process but out of those only 3 Antipoverty NGO's and 2 councils"*), in Latvia there is a significant gap between who decide – Government – and who is in the field and that is not consulted.

On the other side of the scale, there are countries like Germany – with a very positive evaluation in the three areas in analysis – and Romania and Italy. For these, the implementation of the CCP was a reality since the beginning of all the process, with a *"good participation process for all partners who are involved in the process to develop the PA and the ESF OP on federal level (...consultations and separate meetings"* (Germany), and with good results as expressed by Italy – *"Some proposals advanced by CILAP (EAPN Italy) were taken and added into the PA"*.

In other countries like Portugal, Bulgaria, Finland, Ireland and Slovakia the process of consultation was only formal and underlined that some partners were in better position to participate than others, the trade unions for instance. On the other hand, in some countries the process put in place is not very clear (an issue of transparency – highlighted by Ireland, Portugal). Slovakia speaks about the lack of balance in the ratio between stakeholders and that *"the voice of the others (participants from the roots) are not heard"*. Bulgaria testifies: *"... they exist just to answer the requirements of EU regulations but they do not create real opportunities for civil organizations to have their voice heard during the decision-making process"*.

In what concerns Satisfaction, we want to highlight Spain and Estonia, because in both cases there is a recognition, quite positive, that the CCP is being implemented (5) but the gap between that recognition and the satisfaction with the process is higher than the other countries, respectively, 3 and 2.

II - Partnership Agreement

On 22 December 2013 a new set of rules and legislation governing the next round of EU investments for 2014-2020 came into force. For the first time, this legislative package set down common rules for the "European Structural and Investment Funds" (ESIF), ensuring a more strategic and complementary use of different sources of EU funding, and to combine and simplify their use for a better impact on growth and jobs¹¹. However, the extent of involvement of EAPN Networks in the drafting of the PA was generally low (less than 3 – 2.88) when assessing the average response. Spain and Romania are two examples of better practice – *"EAPN ES and other social NGO's presented a joint proposal as Spanish Third Sector, within the NGO's State Council and all our proposals have been included"*. In Romania *"The World Vision Romania as member of EAPN Romania and of the Coalition of Structural Funds was involved in the Thematic Advisory Committees."*

Another positive example is from Poland. When trying to understand the level of the involvement of NN in the PA, EAPN Poland (as well as Germany and Romania) answered positively to all the items. This satisfaction is visible also in the involvement of other NGOs at national level: *"Poland Polish authorities invited officially many different NGO's to several conferences and consulted the draft texts of Partnership Agreement also by publishing it, sending it to stakeholders in Word format with template for remarks. They gathered responses and proposals of amendments and answered to every of them in a more or less detailed way. Some was accepted, many was rejected with explanations"*.

In fact 9 NN said that they were involved in the drafting of the PA, and this involvement was of at different levels (Portugal, Finland, Ireland, Poland, Spain, Germany, Italy, Romania and Check Republic).

¹¹ http://europa.eu/rapid/press-release_MEMO-14-331_en.htm

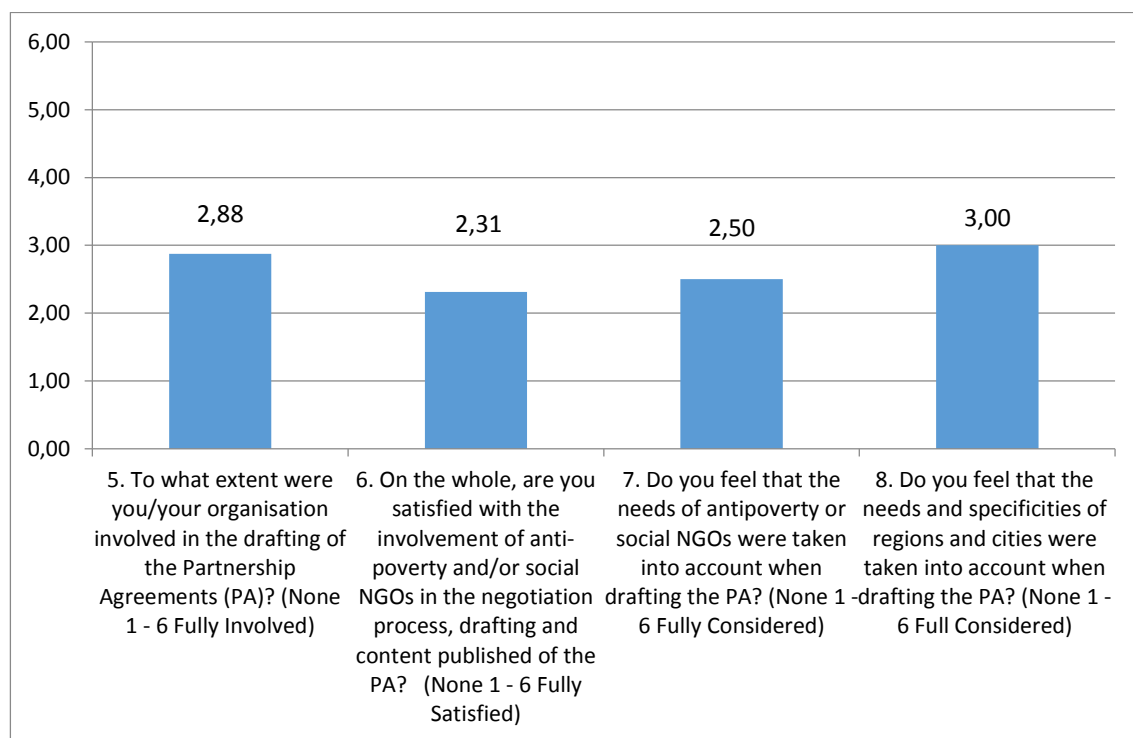
But 4 NN said that their input on the PA was not taken on board. (Portugal, Ireland, Finland and Check republic). Portugal and Ireland have a similar situation; they made recommendations to the PA but it is not clear if they were taken on board: *“Eapn Portugal made a document with recommendations for the partnership agreement in 2013, but we don’t get any kind of feedback”*.

Those countries that said they were not heard at all (7 in total) confirmed that they were not consulted. Czech Republic said that they did not have the technical capacity or resources to make an input.

The Bulgarian example shows some of the weaknesses in how the Partnership Agreement was prepared and implemented: *“the potential of civil organizations in general to influence the decision-making process was very weak because of their small share in the total number of working group members (more than 60, with strong dominance of public administration)”*. *“In the PA Monitoring Committee one of the members of the Committee should be a representative of NGOs working in the field of social inclusion and integration of marginalized groups”*.

When assessing the other questions on the involvement of anti-poverty and/or social NGO’s ie if their needs were taken into account or the needs and specificities of regions and cities, in general, the average of answers was less(equal) than 3:

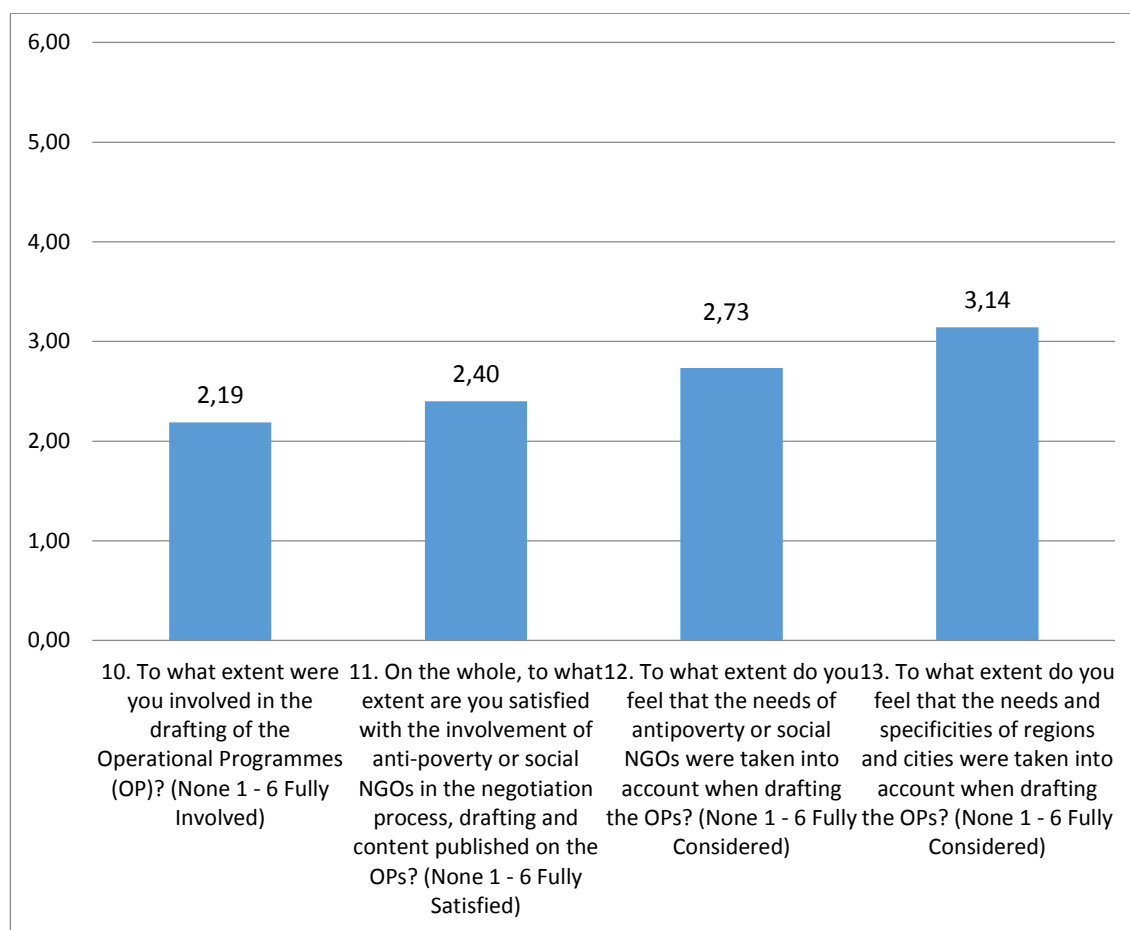
Graphic 2 –Extent of engagement in the Partnership Agreement



III - Operational Programmes (OP)

The same analysis that was previously made is also repeated for the Operational Programmes. Looking at the graph, the average for the 4 questions was again quite low. The exception is in the question related to the extent that OPs took into consideration the needs and specificities of regions and cities, with an average of 3.14 (0 none – 6 fully considered).

Graph 3 –Extent of engagement in the Operational Programmes



In what concerns the involvement of NN in the drafting of the OPs there was a very positive involvement from Germany (6) and Romania (4): *“Through experts from the Consultative Committees and working groups of the line ministries in Romania, we managed to present opinions and antipoverty NGO’s interests and to partially promote them to the strategic objectives of each OP”*. Where 7 NN said that they were not involved, mainly, this is because they were not consulted. The other 9 NN confirmed their involvement (Czech Republic, Finland, Germany, Ireland, Italy, Portugal, Poland, Romania, Spain) and the majority said that they were invited to a meeting to discuss the OPs (7 NN).

Table 1 - To what extent were you involved in the drafting of the Operational Programmes (OP)? If Yes, please say how you were involved.

	We were consulted on the draft	We were invited to a meeting to discuss the Ops	We provided input to the Ops	Our input on the OPs was taken on board
Belgium				
Bulgaria				
Czech Republic		x		
Denmark				
Estonia				
Finland	x	x		
Germany	x	x	x	x
Ireland	x	x	x	
Italy		x	x	x
Latvia				

Malta				
Poland	x	x	x	x
Portugal		x	x	
Romania				x
Slovakia				
Spain	x			
Total	4	7	5	4

The act of being consulted, invited to a meeting or being able to provide inputs however, does not signify quality engagement. When asked to assess the effectiveness of this involvement only 4 affirmed that their input was taken on board. However, there are situations in which the input was partially taken up. For example, Spain reports a positive involvement (they were consulted on the draft) but they highlighted that *“Although Several of our proposals have been included, not all our proposals related with final programme management have been accepted.”*

In what concerns the participation of anti-poverty or social NGO’s and if their needs were taken into account, countries like Germany, Poland, Portugal and Ireland confirmed that in the process of preparation and negotiation of the Operational Programmes many civil organizations including EAPN attended different consultation moments (meetings) because the national authorities invited officially many different stakeholders. However, the inclusion of their recommendations in the OPs is another dimension. For instance in Poland, some of the proposals were accepted and others rejected (although they have explained the reason for the rejection). And for Ireland, for example, *“Many civil society organisations including EAPN, attended different consultations on other OPs, including the two regional OPs. [but] it was clear from the outset that there would be limited focus in these OPs on measures to address poverty and social exclusion beyond that of labour market measures in the ESF OP”.*

For Portugal, EAPN had a specific meeting related to the questions of child poverty and afterwards presented a proposal which was not included in the national OP for social inclusion.

From these examples, it is clear why the general satisfaction of NN towards the involvement of anti-poverty or social NGOs in the preparation of OPs is low in almost all the countries that answered the questionnaire.

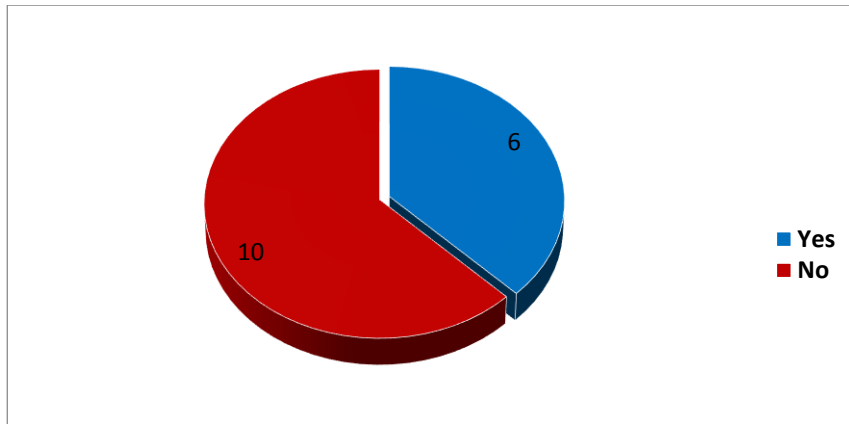
IV - Monitoring Committees

Participation of different stakeholders in the Monitoring Committees (MC) is also one of the key principles of the Code of Conduct on Partnership. It is understood that *“partners should be represented on the monitoring committees of programmes. [and] (...)Through their active participation in the monitoring committees, the partners should be involved in assessing performance on the different priorities, the relevant reports on the programmes and, where appropriate, calls for proposals”*¹².

¹² For more information: <http://ec.europa.eu/social/main.jsp?catId=89&langId=en&newsId=2019&furtherNews=yes>

Despite this recommendation, the next graph demonstrates the low participation of NN in the MC:

Graph 4 – Does your organisation/NGO take part as a member in the MC?

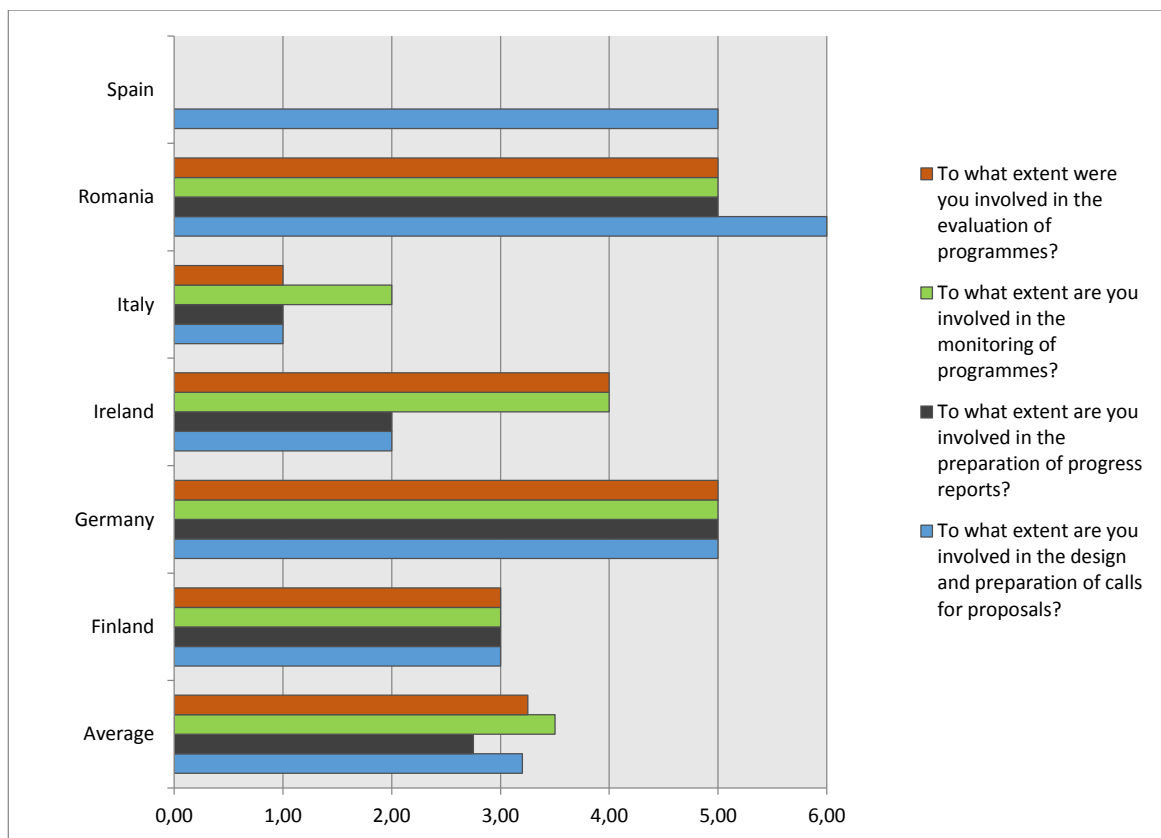


All the national networks say that in the Monitoring Committees there is a place for the social sector, but the quality of this participation is in most cases questioned. 6 out of the 10 national networks participate to some degree (Spain, Romania, Italy, Ireland, Germany and Finland).

Despite this evaluation, there are exceptions and good practices: for example: in Poland, the NN is not participating in the MC, but there was a “democratic election for NGO representatives to the MC. It was an initiative of Polish NGO’s that was accepted by Polish authorities”. In the case of Spain, EAPN was “invited to participate in the Monitoring Committee and to the formal constitution meeting (October 2015). [and they] had the opportunity to bring forward proposals relating to the functioning”. In Spain the participation of NGO’s is quite wide, involving key areas like women, disability, Roma communities.

Of those involved, Germany, Romania and Spain highlight the highest level engagement (5-6), however all rate more highly their engagement in the design/preparation of calls, than in monitoring and evaluation process.

Graphic 5 – Extent of involvement in Monitoring Committees

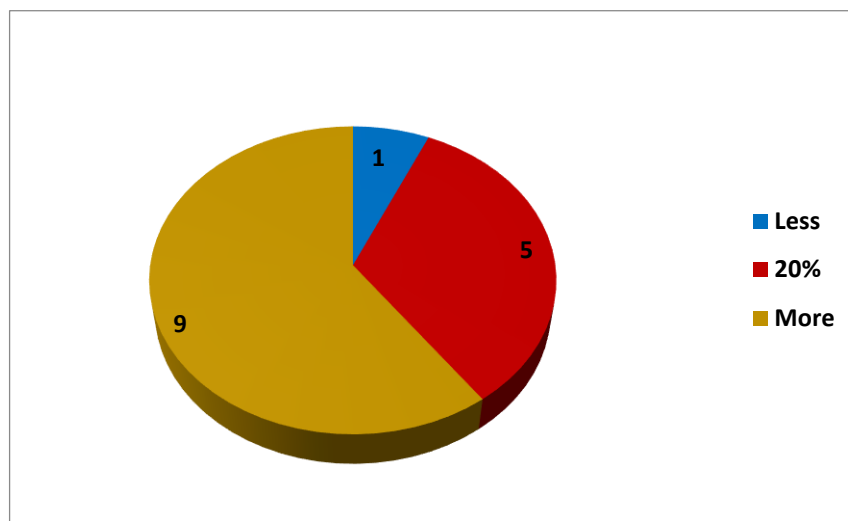


For those that are not involved in the MC the main reasons presented were: mainly, lack of information, lack of financial resources and lack of access to political choices. In this case, it is important to highlight the example of Czech Republic that expresses the lack of capacity of most NGO's to participate in the MC. This is also a factor that explains the low capacity for lobbying work of some of these organisations. Ireland also highlights misgivings with the model of functioning of the Monitoring Committees: the numbers of meetings are few and the contents are" *focused strongly on providers/overseers financial responsibilities*".

Section B- Analysing the Partnership Agreements and the Operational Programmes – monitoring the 20 % of ESF dedicated to social inclusion and poverty reduction

1 – OVERALL ASSESSMENT OF SPENDING OF 20% OF ESF ON SOCIAL INCLUSION AND POVERTY REDUCTION

1.1 – Allocation of 20% of ESF to social inclusion and poverty reduction



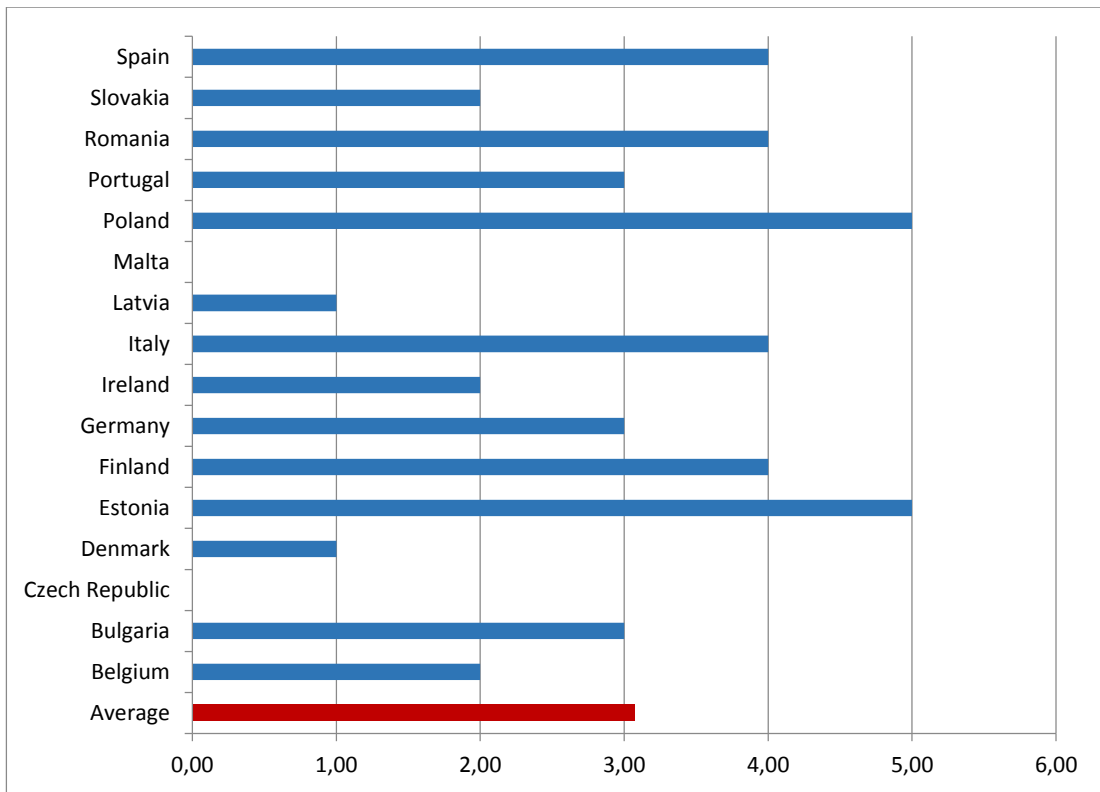
Graphic 6 – Allocation of 20% of ESF on social Inclusion and poverty reduction

From the 15 networks that respond to this question we can see that 9 networks (Belgium¹³, Bulgaria, Estonia, Germany, Ireland, Italy, Malta, Portugal and Romania) consider that more than 20% of ESF has been allocated to social inclusion and poverty reduction and 5 networks assumed that is 20% (Denmark, Finland, Poland, Slovakia and Spain). Only one network responds that this value is less than 20% (Latvia).

¹³ Taking in consideration the position of Belgium and even if officially the answer is yes, in practice very few projects really address poverty and social exclusion.

1.2 – Satisfaction with the funds allocated to social inclusion and the reduction of poverty

Graphic 7 – Level of Satisfaction with the funds allocated to social Inclusion and poverty reduction

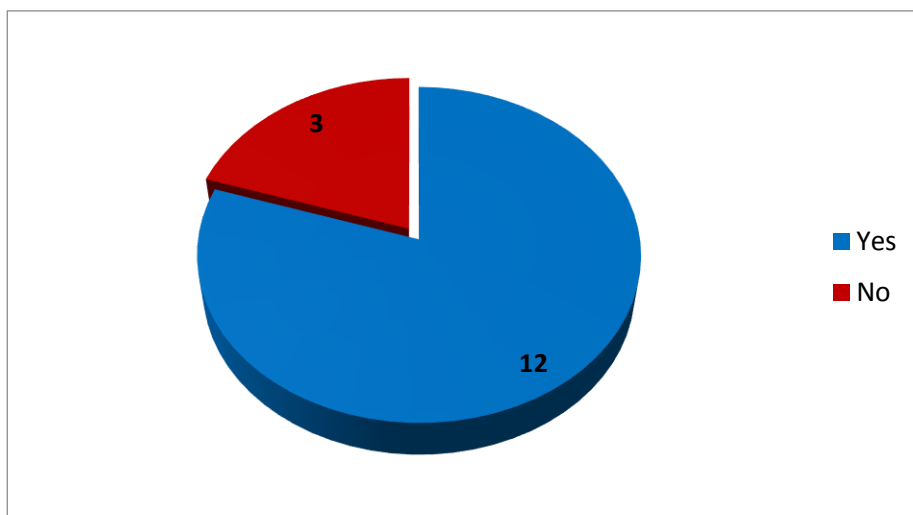


On this question there is some disparity on answers. Some networks scored very positively, like Poland and Estonia and other networks that scored 4 in 6 like Spain, Romania, Italy and Finland. However, the average of satisfaction is rather low which leads us to consider that although there was support to the numerical allocation of funds for the fight against poverty, there is a certain distrust regarding the effective implementation of these funds.

1.3 - Other initiatives to support applicants:

- In preparing and submitting applications for projects, namely by providing information and advice on the design of operations and on the procedure for the submission of applications

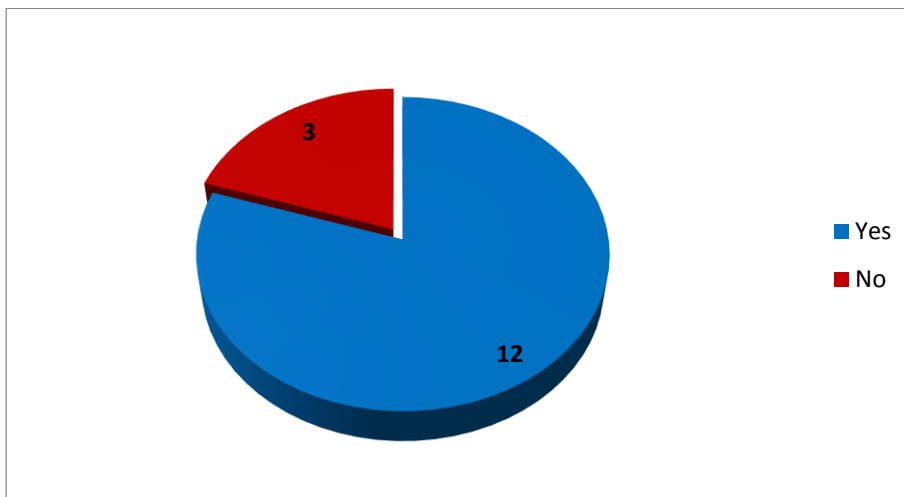
Graphic 8 – Existence of initiatives to provide support to applicants



To this question almost all national networks presented an affirmative answer. Czech Republic didn't answer to this question and the three negative answers are from: Italy, Latvia and Spain".

- **To implement and manage the selected projects, namely by providing information and advice**

Graphic 9 - Existence of initiatives to provide support to beneficiaries to implement and manage the selected projects



To this question we can see by the graphic that almost all the networks consider that there are, in their countries initiatives to support beneficiaries to implement and manage selected projects. Czech Republic did not answer this question and 3 networks have a negative answer: Ireland, Italy and Latvia.

In general, we can assume that all networks that have responded to this qualitative question consider that 20% of ESF was dedicated on social inclusion and poverty reduction or even more in some countries. **The big issue is what social inclusion and poverty reduction is considered to be.** For instance, in Belgium the allocation is divided in the following way: active inclusion 16.8%; Integration of marginalized groups, Roma 2.7%; Social Economy 2,0%. EAPN Belgium stated that: *“In these percentages, a very small part of the budget actually goes to people experiencing poverty, or to projects that directly empower them. Where it’s about active inclusion, it’s mostly about activation, which is not all that inclusive.”*

In Portugal *“the Partnership Agreement is based on competitiveness, social inclusion and employment and human capital, sustainability of resources. There are 12 Operational Programmes: 4 thematic (competitiveness; human capital, social inclusion and employment and sustainable development and use of resources; 5 regional programmes, 2 for outermost regions (Madeira and Azores) and 1 for technical assistance. The percentage of 20% is even a little bit superior, but we aren’t sure that it will help to reduce poverty and social exclusion in Portugal.”*

Also in Bulgaria the feeling is: *“the challenge is to ensure that ESF funds will be used in order to support adequate public policies, i.e. public policies contributing to poverty reduction and enhancing social inclusion”*. In Bulgaria the government devotes more that 27% of the ESF to social inclusion.

In this question we also understand that the networks do not know very well how it will be implemented and what will be the concrete results. For example, Denmark stated: *“3 areas: education, employment and social enterprises have priority, but as the programme has not really started yet, we do not know how it is implemented. From the former programme period we know, that projects directly aimed at the poor and socially excluded are very few and small. Most of the money are expected to be used for youth education and employment programmes in general for all young people, not especially for the ones who have smaller chances to succeed in education or have already failed one or more times.”* Finland goes in the same direction: *“Money for social inclusion and poverty reduction is greater than before, but It’s hard yet to know how it all will be implemented and the program is a bit late.”*

Italy says the following that resumes the feeling of most networks at this stage: *“The paper is good; we will see how it will be implemented.”* In Spain there is a good practice, at least in the negotiation phase: *“there is a nationwide OP explicitly dedicated to the fight against poverty. This is positive but it is difficult for small*

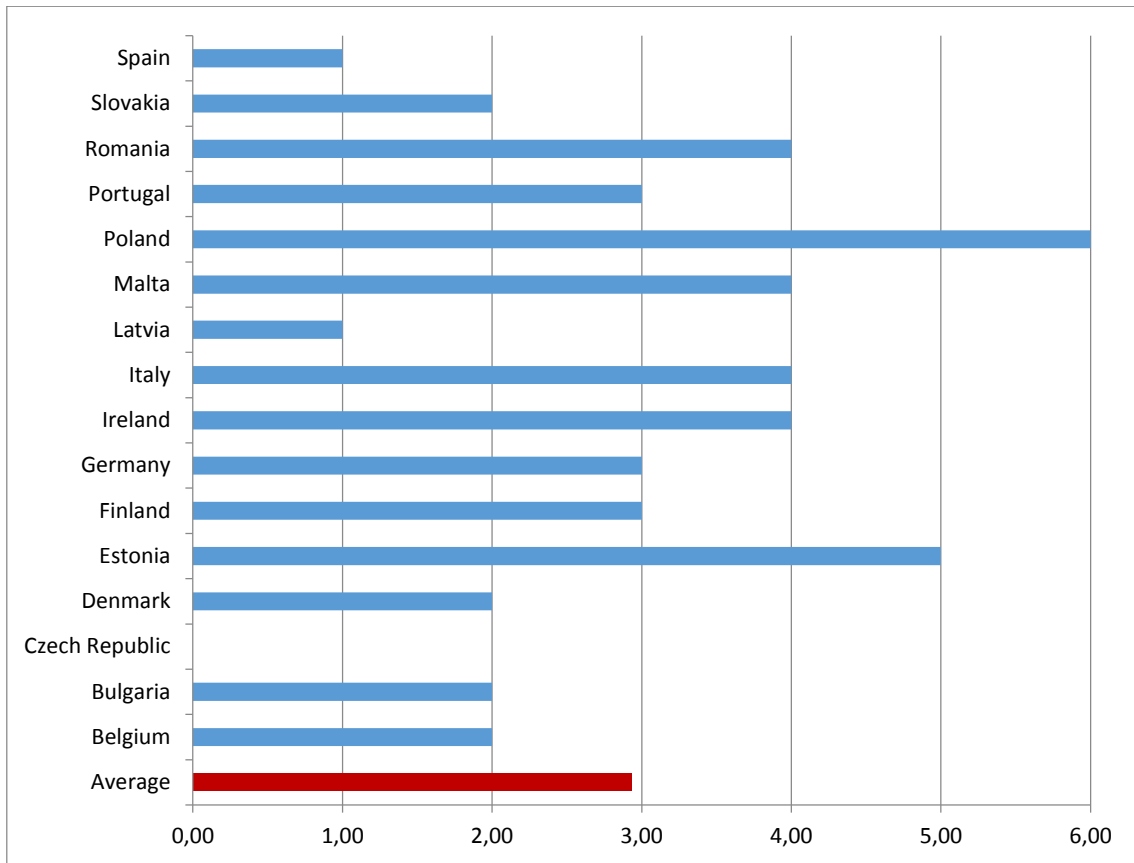
NGOs to have an easy access to it. However, progress has been made over the previous period: before only four organizations were involved while now we expect at least 10 organizations. Until the end of November 2015 we won't know the names of the selected organizations."

In Romania, ESF Resources are allocated to the objective "promoting social inclusion, combating poverty and any discrimination". Under this priority there are 16 priority areas with integrated activities aimed at fight poverty.

2 – PROMOTING ACTIVE INCLUSION

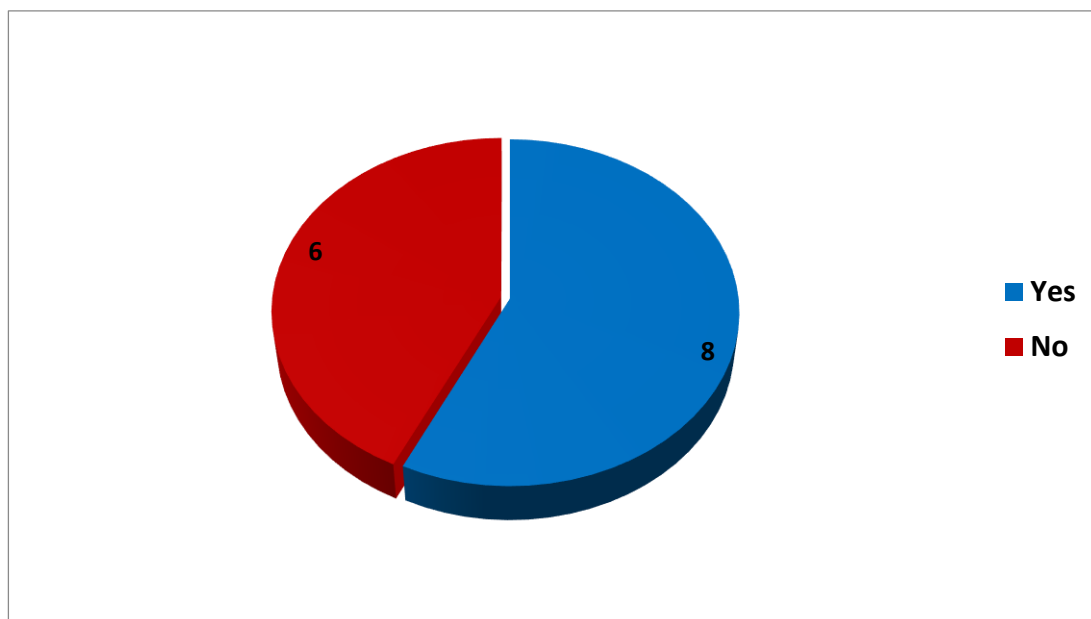
2.1 – The existence of a full national strategic policy framework for poverty reduction, aiming at integrated active inclusion

Graphic 10 – Position of the countries concerning a national strategic policy framework for poverty reduction, aiming at integrated active inclusion



On this question we can see that the average is not positive even with two countries that scored in 6 and 5.

Graphic 11 - Does the national framework propose an integrated strategy of all 3 pillars?



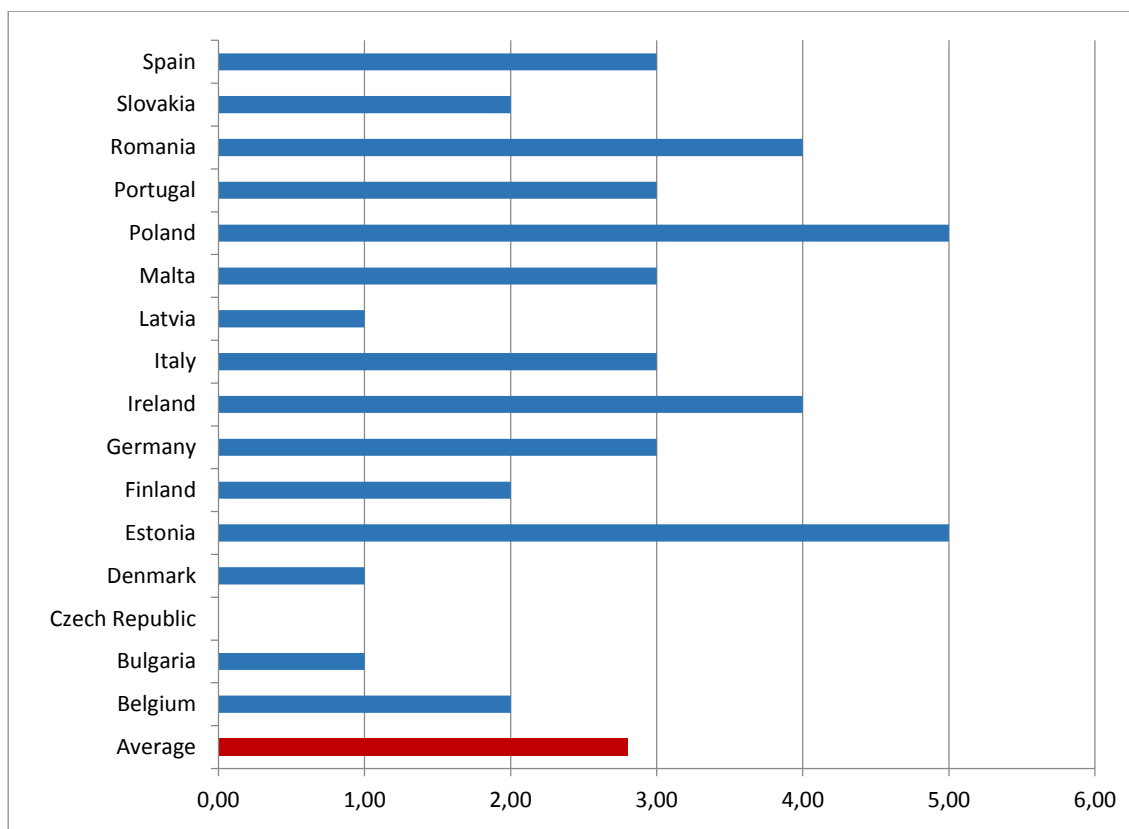
On this question we have two non answers: Belgium and Czech Republic. Belgium justifies their answer (“We are still waiting for the draft version of the National anti-poverty plan, it might be in it, but so far no information. The emphasis is less and less on active inclusion”).

Bulgaria answer Yes and add “to some adequate extent” and answer the 3 strands: adequate income support, labour market activation, access to enabling services but the Bulgarian network add some information in each the three strands: adequate income support (just income support but partial and not adequate; labour market activation (only jobs, not quality jobs); Access to enabling services (partial and not adequate). Portugal, Poland and Malta also selects yes and the three strands. Romania answers Yes and refers specifically to the fact that the first strand is very poor. Ireland answered Yes but it is not being implemented in a balance way with labour market activation dominating.

Spain also put No and selected the adequate income support as a weak point and with no national strategy; and selected also labour market activation. Finland answers No and selects two strands (labour market activation and access to enabling services). EAPN Latvia answers No and select only one strand (labour market activation – partly and not clearly orientated) Germany, Slovakia and Denmark answers No and the only strand covered is labour market activation. Estonia answers No and selects the labour market activation and access to enabling services. Italy identifies two strands – Labour market activation and access to enabling services.

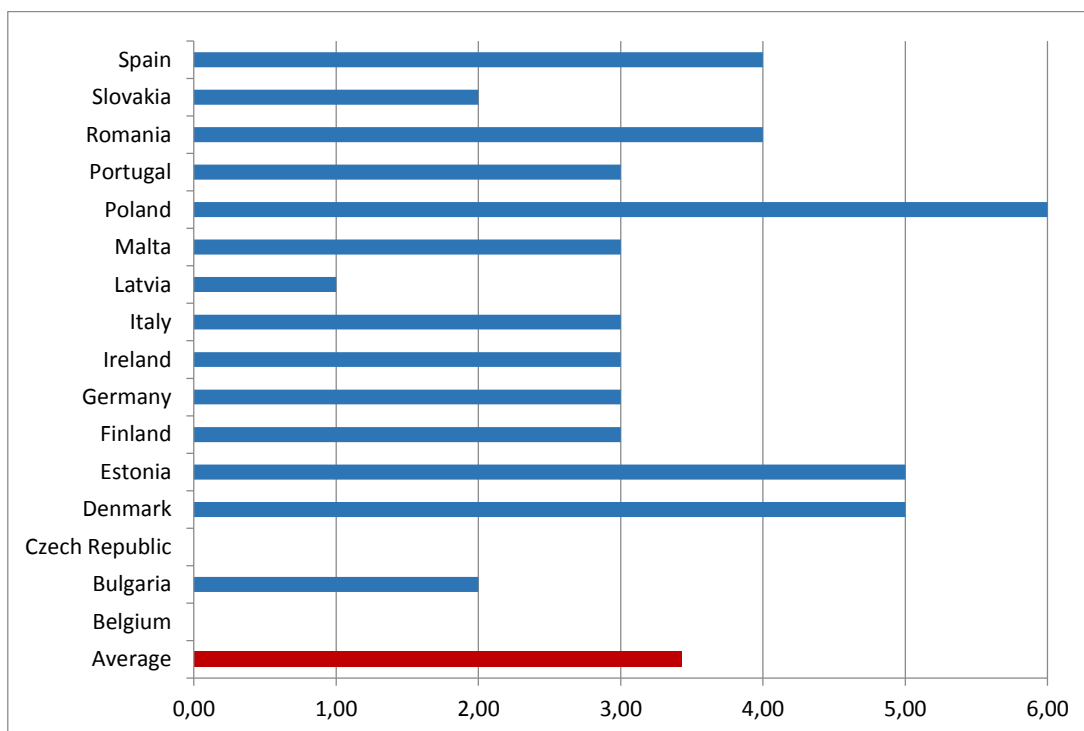
2.2 – Satisfaction with the strategy and evidence of NGOs involvement

Graphic 12 – Level of satisfaction with the strategy and if it will contribute to poverty reduction



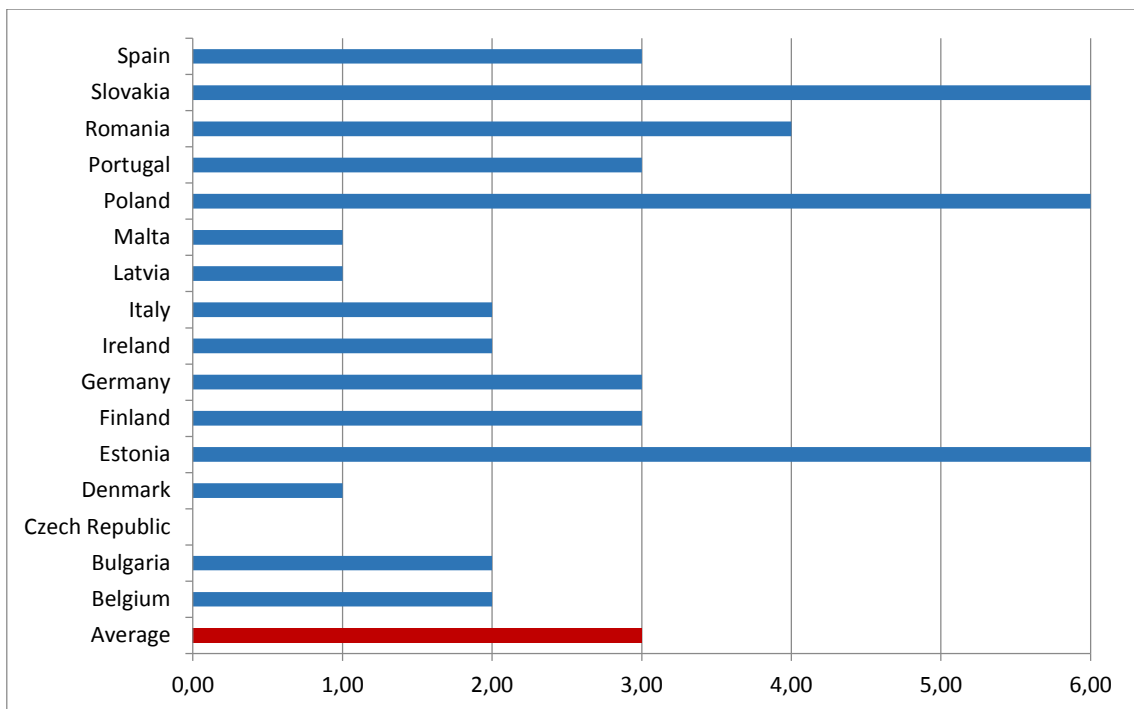
On this question the average is also negative and we have 3 countries that scored 1 (Bulgaria, Denmark and Latvia).

Graphic 13 – Evidence of existing measures to support the achievements of the national poverty target

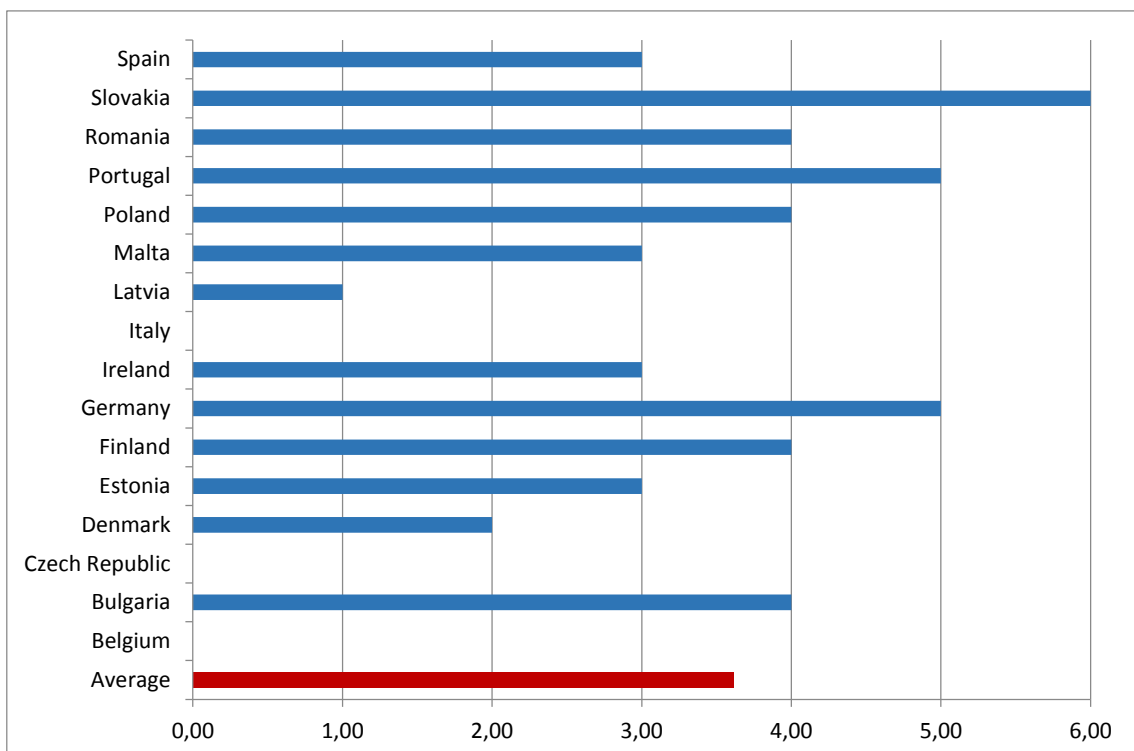


On this question we have a positive assessment (the average is above 3).

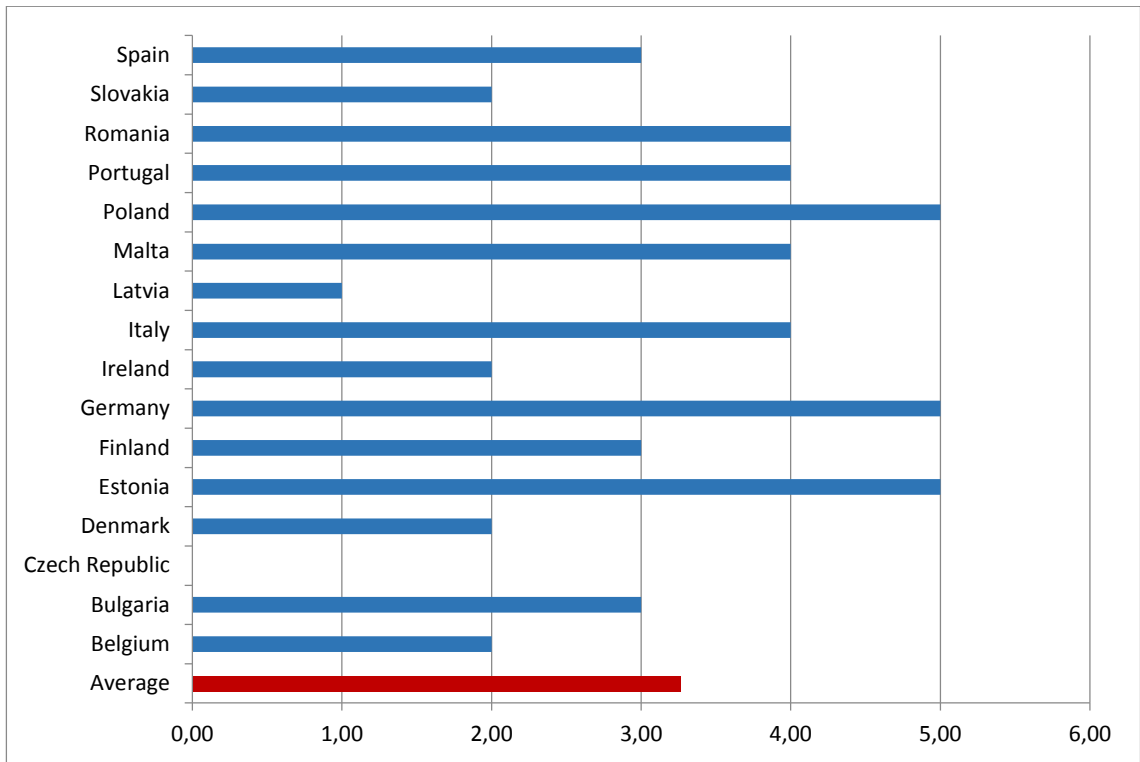
Graphic 14 - Evidence of NGO's involvement in the design and implementation of the national strategic policy framework



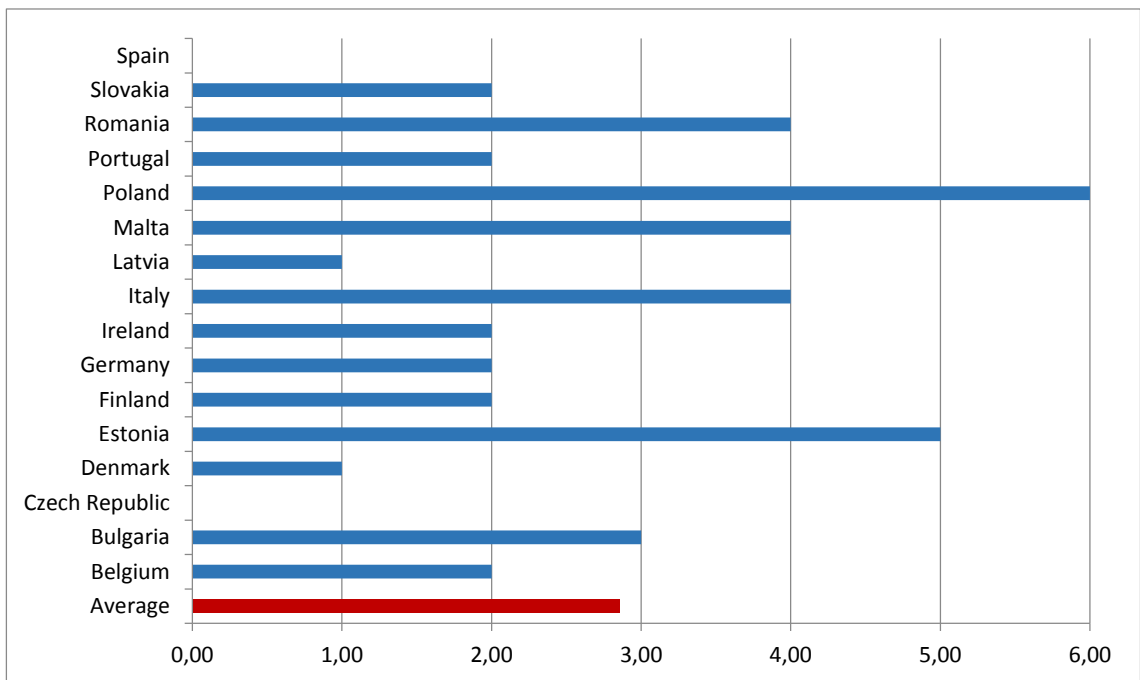
Graphic 15 – Evidence of a section in the Partnership Agreement for the implementation of this strategy



Graphic 16 – Adequacy level of this strategy to the activities of the OPs



Graphic 17 – Level of satisfaction with the activities funded under this heading



2.3 – Summary of remarks about the national strategic policy framework for antipoverty strategy and its implementation through the PA and OP.

In terms of this question we have a diversity of situations. For instance, some countries have a specific national anti-poverty policy framework as in Estonia and in Italy. EAPN Estonia says: *“There is a strategy called a Wellbeing Strategy that gathers together employment, social protection, equal opportunities and gender equality principles. The strategy is not yet completed and changing all the time in the process of consulting different parties. We are involved and overall satisfied with the measures and implementing plan but we don’t have anything fixed yet.”*

In Italy, in July 2015, a National Plan against Poverty was presented, that aims to reduce poverty in Italy with the OP

In other countries we have a strategy ostensibly oriented to **Active Inclusion** as in Spain, Germany, Ireland, Bulgaria, Belgium and even Denmark. However, the German antipoverty strategy, is only oriented to one of the three strands of active inclusion (ie employment) *“the German antipoverty strategy is mainly oriented to one of the EU poverty indicators “living in households with very low work intensity”. The two other ones “at-risk-of-poverty after social transfers (income poverty)” and “severe material deprivation” are not addressed in the German PA and the OP”*. EAPN Sweden however reveals that *“... in spite of the main goal of the fund focusing on job creation, there is a large space open to work with groups very “far away from the labor market”. Within this space there are many possibilities to run projects that focus on combating the causes of poverty through mobilizing the oppressed and empowering their organizations. There are however some limitations. The money goes mostly to rich and well established organizations. There exist possibilities for more vulnerable organizations to participate in partnerships and project networks. But the rich organizations have much power. The weaker organizations are dependent on the rich ones (rich in money, staff, training, etc). “*

In Belgium: *“in the OP, there is a lot of mentioning of Active Inclusion, but it’s not the balanced approach, activation stays the central theme”*. In Ireland it is similar: *“The Partnership Agreement and ESF Operational Programme (Programme for Employability, Inclusion and Learning) both present active inclusion as a key context. However, in terms of implementation, it is limited to one priority under the ESF Operational Programme. This is Priority 2 which is Promoting Social Inclusion and combating discrimination in the labour market and the investment priority is Active inclusion, including with a view to promoting equal opportunities and active participation, and improving employability. This investment priority has a focus on access to employment for unemployed people and inactive people including those at risk of poverty and social exclusion. The Partnership Agreement mentions the areas of adequate income and services but there are no measures in the OPs which address these.”*

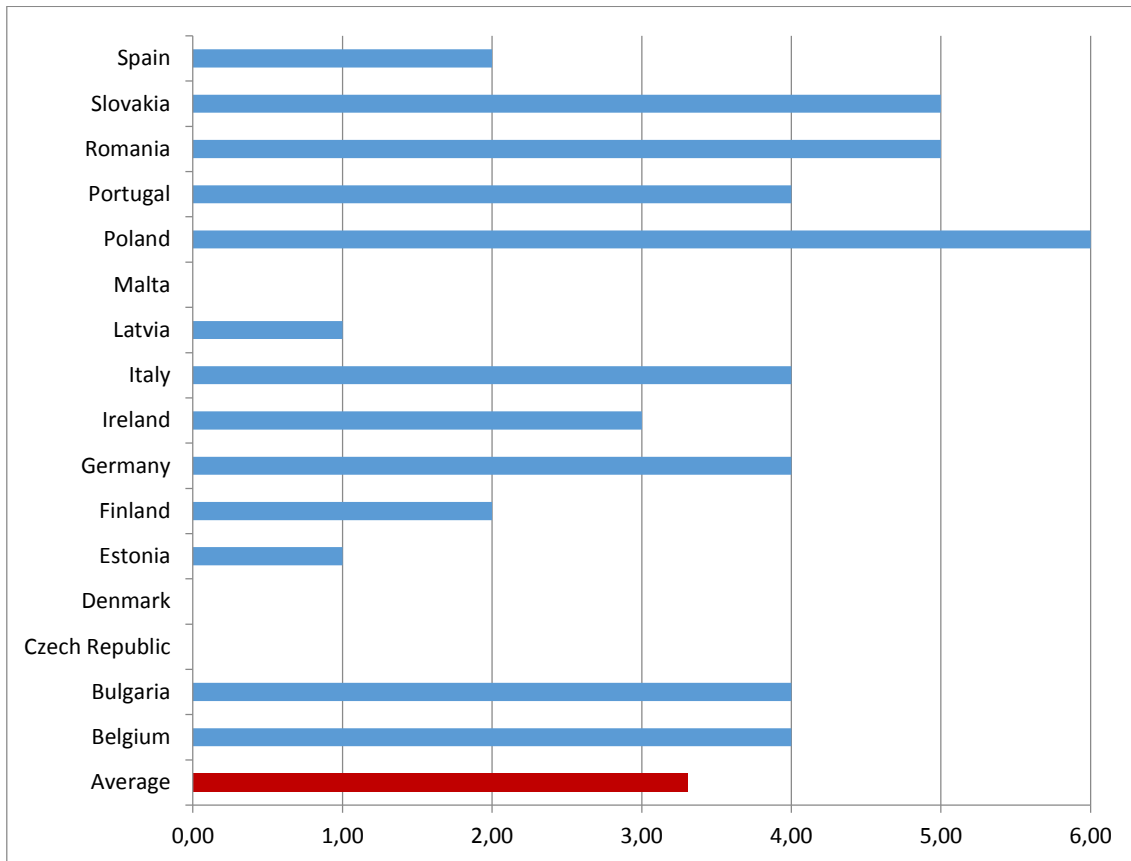
In Portugal, there is no strategy to combat poverty and social exclusion; there is a social emergency plan that was created when the Troika was in Portugal. This plan seeks to respond in a charitable way to the social problems created by the cuts in social protection. EAPN considers that in the PA and OP there are measures to combat some social problems and some target groups but it is not possible to say that there is a strategy or even commitments and targets for combating poverty and social exclusion.

EAPN Romania considers that *“at the programme level the Anti-Poverty Strategy is very complex and it meets largely the needs in Romania. The major challenge will be in implementing these measures in the strategy and fulfilling the principle of complementarity between the Operational Programmes”*.

3 – INTEGRATION OF MARGINALISED ROMA COMMUNITIES¹⁴

3.1 – The existence of a national Roma Inclusion Strategic policy that sets achievable national goals for Roma integration to bridge the gap with the general population

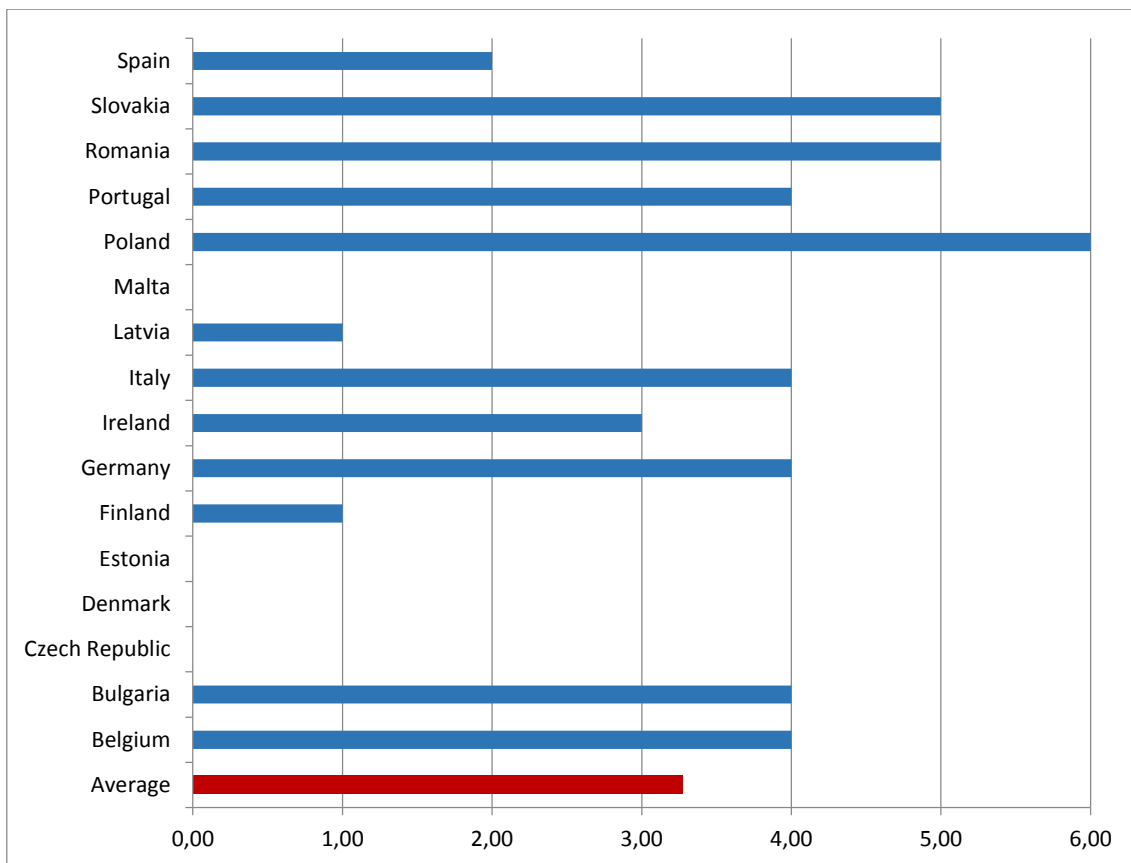
Graphic 18 – Position of the countries re a National Roma Inclusion Strategic policy framework



To this question we have 3 networks that didn't answer: Malta, Czech Republic and Denmark. Overall there is a positive average.

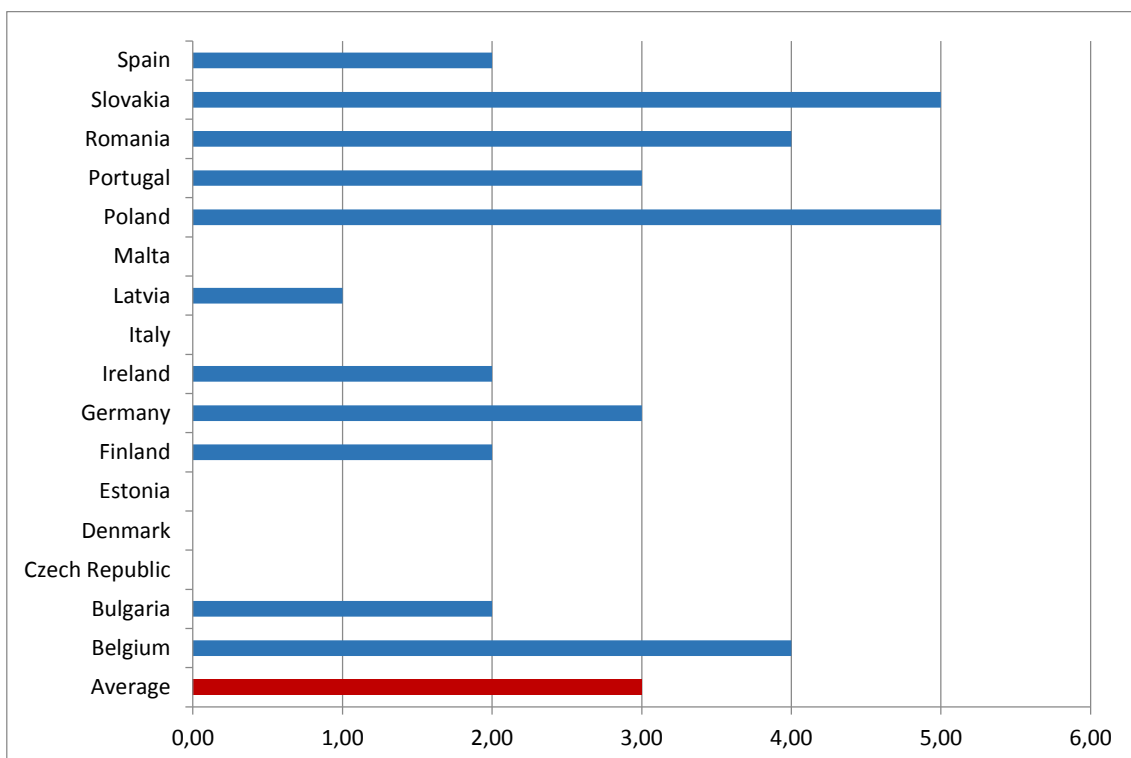
¹⁴ This section was only for countries that have Roma Communities.

Graphic 19 - Does the strategy address the four EU Roma integration goals relating to access to education, employment, healthcare and housing?

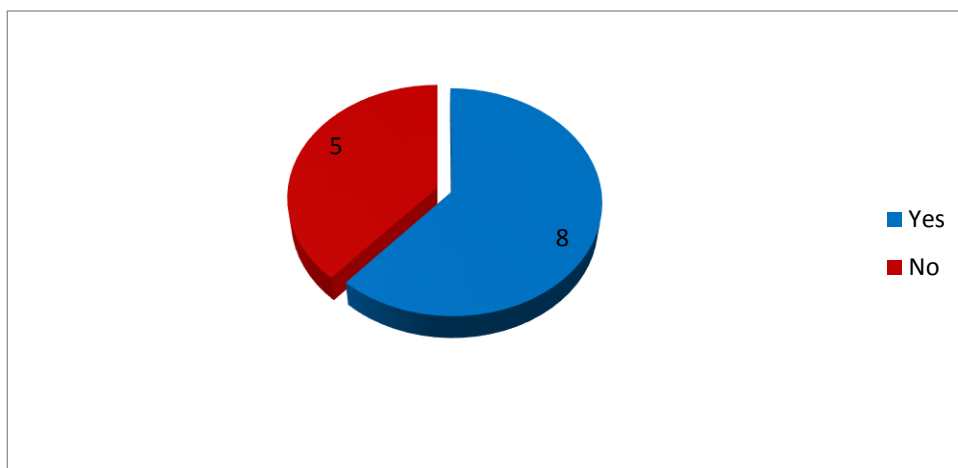


In this question, we have four networks that do not answer: Malta, Estonia, Denmark and Czech Republic. We have one network (Poland) that scored with 6 and two with 5 (Slovakia and Romania).

Graphic 20 – The existence of a national monitoring system in place to assess the impact of the national Roma integration strategy

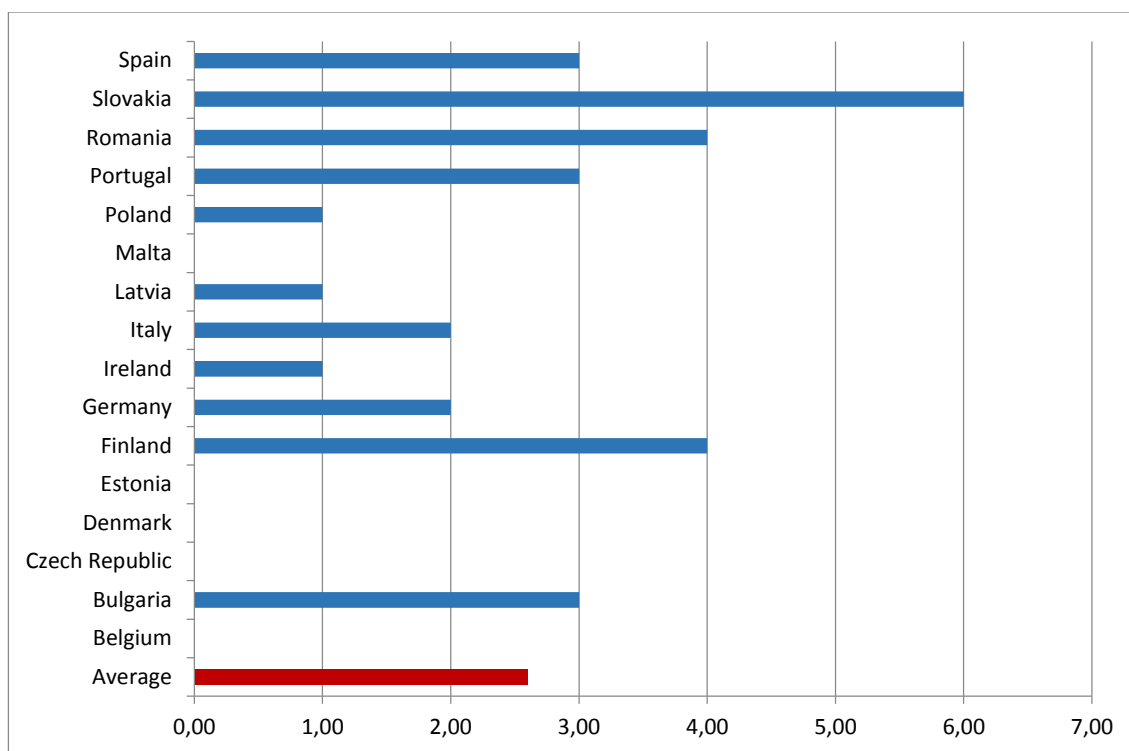


Graphic 21 – The existence of a dialogue with civil society organizations active in the field of Roma inclusion and with Roma communities in the implementation and monitoring of national strategy as well as in their review.



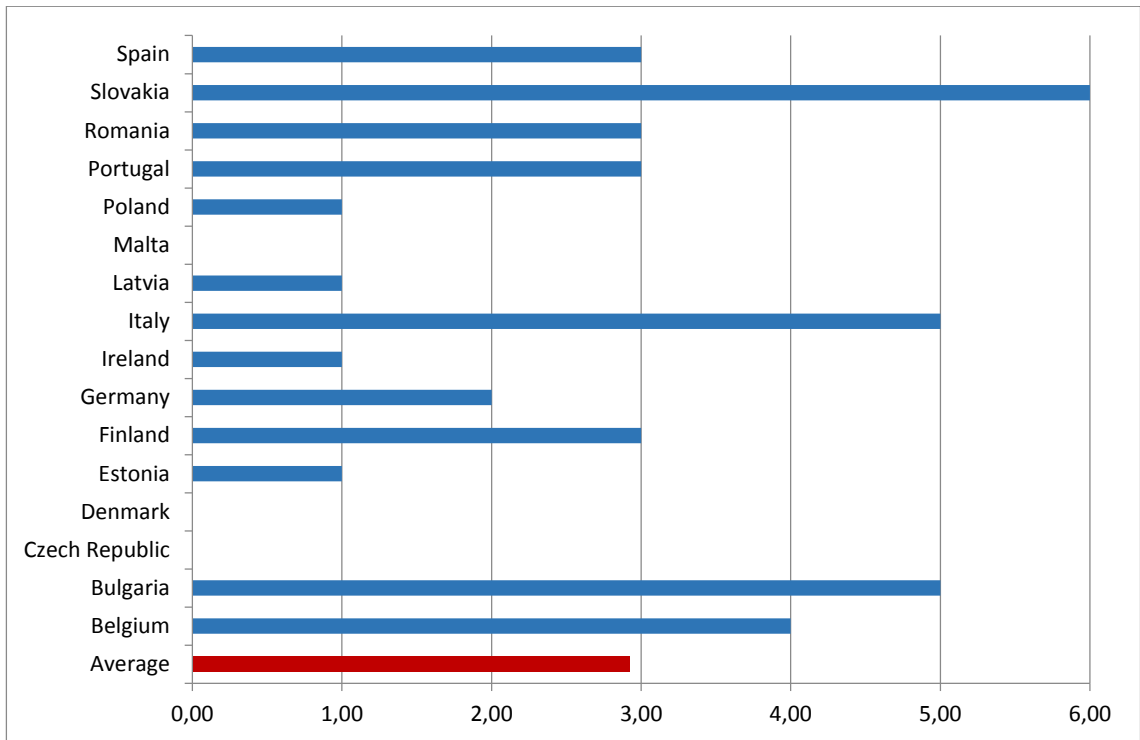
We have 3 non answers: Czech Republic, Denmark and Malta. And 8 networks answer Yes to this question.

Graphic 22 – The existence of a section in the PA which implements the Roma inclusion strategy



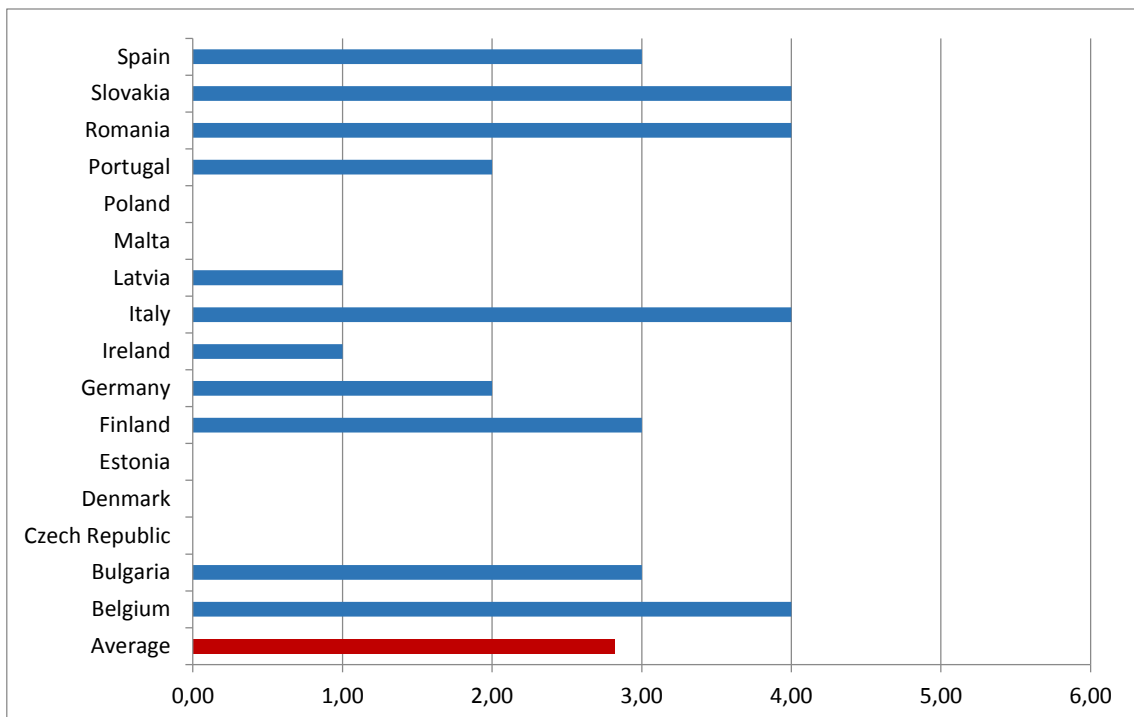
Relating to this question we can see by the graphic that from the networks that respond the average is not positive. We have five networks that do not answer: Belgium, Denmark, Estonia, Malta and Czech Republic.

Graphic 23 – The existence of a section in the OP’s which implements the Roma Inclusion Strategy



On this question we have 3 non answers from networks and the average is below 3.

Graphic 24 – Level of satisfaction with the activities funded under this heading



Relating to this question no network responds positively with 6 or 5 and the average is below 3.

3.2 – Summary of remarks on the integration of Marginalised Roma communities

In terms of the Integration of marginalized Roma communities some countries appear to have a clear strategy of integration, as in Spain, Ireland, Italy, Portugal, Bulgaria, Poland, Romania and Slovakia. In Estonia and Germany, the Roma community is not referred to specifically in the PA and OP's but are included as a target group within the category "migrants" or "other minority". In Malta, there are no Roma people and so the issue is not relevant.

Denmark, Belgium, Latvia and Check Republic do not answer this question.

In Bulgaria, for instance there is a National Council for Cooperation on Ethnic and Integration Issues. It is a body to the Council of Ministers which provides a platform for discussion between public authorities and Roma NGO's. In Portugal, there is a similar structure called the Advisory Group for the Integration of Roma – CONCIIG that is composed of several elements from different ministries and NGO's, where EAPN Portugal takes part. In this structure, the Roma Associations are also represented and also academics. In Ireland, there is a National Traveller Roma Inclusion Strategy Steering Group and there is a specific mention in the Partnership Agreement and the ESF OP to Travellers as one of the groups experiencing discrimination and high levels of exclusion.

In Italy, the OP is composed of five strands and the strand 3 (System and pattern of social action) supports the Local and Regional Public Authorities in carrying out Integration Activities for the communities at risk of marginalisation. The objectives are: to reduce territorial diversity amongst the several regions and Cities; to foster more effective models and best practices through social innovation and by the NGOs sector, Social economy and supported by several European funds. These integration activities are directed at Roma people, Sinti and Caminanti (these two cultural minority groups are in Italy only, as Travellers are in Ireland), and people at risk of discrimination like sexual exploitation, unaccompanied foreign minors, prisoners and former prisoners, and asylum seekers. EAPN Romania considers that "*the integration of marginalized Roma communities in the national strategic policy framework for anti poverty strategy is well represented*".

4 – INTEGRATION OF OTHER MARGINALISED GROUPS (migrants, including undocumented, other ethnic minorities, traffic human being victims, asylum seekers, homeless, others)

4.1 – The existence of specific strategy to support the integration of other marginalized groups

The following countries focus on migrants, including undocumented are: Belgium, Finland, Germany, Italy Portugal and Spain.

The countries that consider Human Trafficking are: Finland, Italy, Latvia, Portugal Romania and Spain.

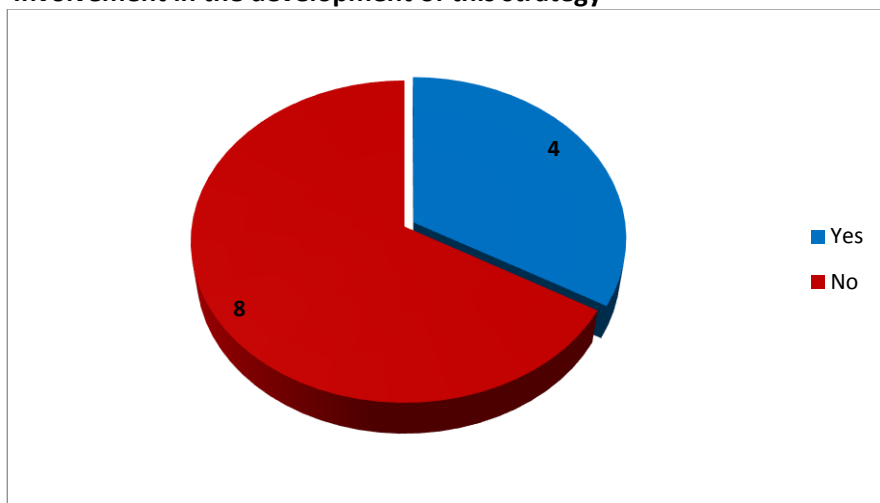
In terms of asylum seekers, the countries highlighted as developing specific strategies for this marginalized groups are: Germany, Italy, Portugal and Spain.

Considering homeless people we have the following countries: Romania, Bulgaria, Finland, Portugal, Spain, Italy, Latvia. In specific case of Ireland there is a strategy to address homelessness but it is not covered in the Partnership agreement or ESIF OP's.

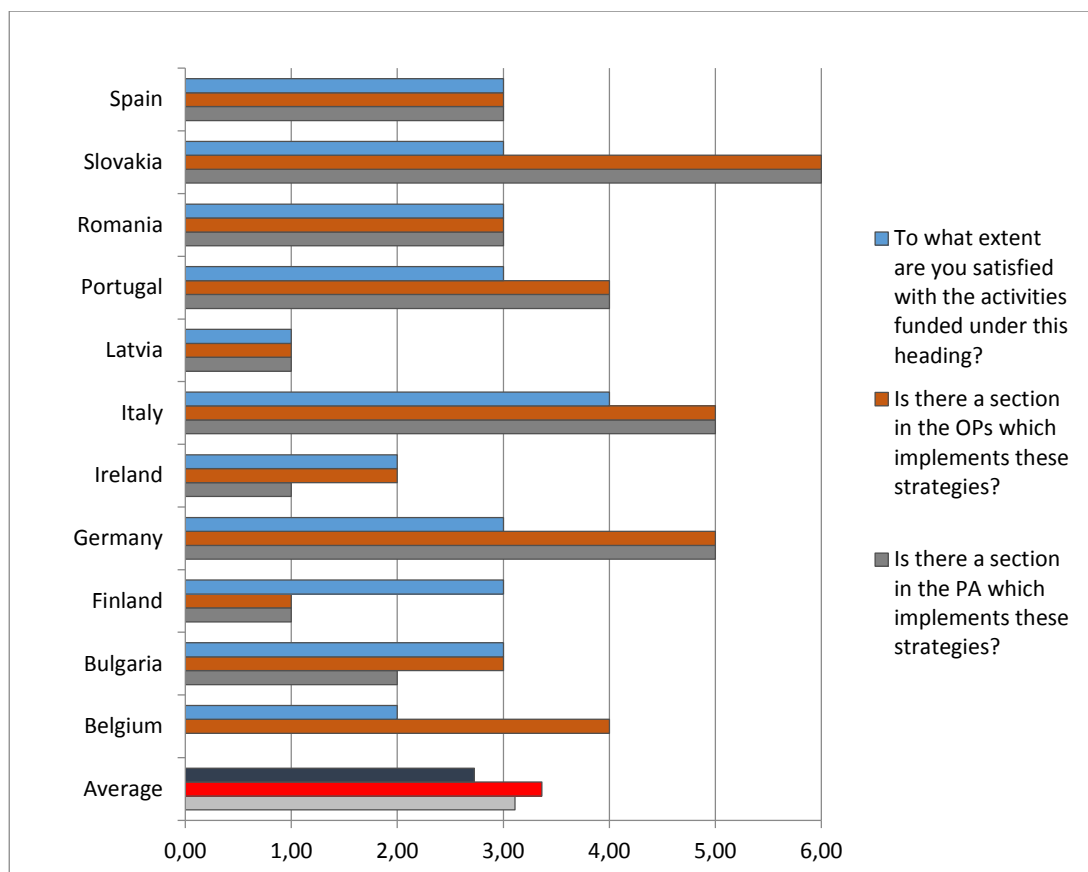
The countries that chose other groups are: Belgium (young unemployed), Finland (equality), Ireland (People with disabilities and young women leaving prison), Italy (migrants living in areas affected by organized crime), Latvia (persons with disabilities, single parents, young people) and Slovakia (no specify).

In terms of the question: “*Were you involved in the development of this strategy?*”, 8 networks say No and only 4 say Yes. Czech Republic, Denmark, Estonia and Malta gave no answer.

Graphic 25 – Involvement in the development of this strategy



Graphic 26 – Evidences for the implementation of these strategies and satisfaction with the activities funded on these areas



In the previous graphic can be seen the answers to 3 questions related to the issue of “Other marginalized groups”. The two first questions have an average above 3. When asked about the satisfaction of the networks relating to the activities funded under this heading the average is below 3. Even the countries that scored at 5 or 6 in the first two questions in the last one scored 3 or 4, for instance Slovakia, Germany and Italy. There were a total of 11 answers.

4.2 – Summary of remarks on Integration of other marginalized groups

In general, all countries have some Programme/Strategy for marginalised groups. In this open question Germany, Finland, Poland, Denmark, Latvia and Check Republic do not answer.

In Estonia, these groups are vaguely mentioned in the Wellbeing Strategy which is not ready yet. No specific strategies have been developed for any of these groups.

In Spain, there is a specific Programme that aims at these groups called: Operational Programme for Social Inclusion and Social Economy - each of these groups are identified in the OP.

In Portugal, there is an III Programme of Action for the Prevention and Elimination Female Genital Mutilation and the III National Plan for Preventing and Combating Trafficking in Human Beings and these programmes are reflected in the OP Social Inclusion and Employment. In Portugal, there is a national strategy for the integration of the homeless 2009-2015 but this same strategy is not reflected in the OP Social Inclusion and Employment. In terms of the involvement of EAPN Portugal there did exist some collaboration in the construction of the National Strategy for homeless people and it has assumed a role in the Assessment Group of this Strategy. Until now there is no information regarding the continuity of this Strategy (the deadline is 2015) but EAPN PT is trying, for a while, to get a commitment from the Social Security National Institute in order to guarantee its follow up.

In Bulgaria, in 2014, as part of the negotiation on the 2014-2020 multiannual financial framework, a National Health Strategy to 2020 was adopted. However, it was not enough to convince Commission

services that the necessary strategic framework is in place. On this basis, it could be concluded that the planned support through EU funds to improving the access to quality health services is endangered by the lack of clear strategic framework. In Malta, the issue on migration does not apply to OPs because it is included in the “Asylum, Migration and Integration Fund”.

In Ireland, the general aim of the ESF OP is on supporting disadvantaged groups, with a particular focus on education, training and employment. In some cases these are named specifically. Investment Priority 2 of the ESF OP: Combating all forms of discrimination and promoting equal opportunities specifically names a number of marginalized groups which will be targeted by measures. This includes young people at risk, migrants, people with disabilities and women, including women leaving prison who will participate in social inclusion, re-integration or employability programmes.

In addition to measures to address gender mainstreaming and equality, two other actions are included which are: *Integration and Employment of Migrants and Tus Nua Project*. The *Integration and Employment of Migrants* is being run by the Office for the Promotion of Migrant Integration in the Department of Justice and Equality and involves a call for proposals to deliver training programmes for over 1,600 participants. While not presented as such in the ESF OP it seems to be a continuation of a programme run under the last ESF Programme.¹⁵ *Tus Nua* offers residential apartments for women leaving the prison system, run by a charity called DePaul Ireland on behalf of/through the Probation Service of the Department of Justice and Equality.¹⁶

In relation to innovation, it states that the ESF Operational Programme will support innovation activities targeting youth, women, ex-offenders and other socially excluded groups. Examples would include the Social Inclusion Community and Activation Programme (SICAP), the Prisoners/ ex-offenders activity, TUS Nua (see above) and the Youth Diversion and Probation Projects. The priority under Priority 3 is to support disadvantaged and disabled persons/students access and continue/remain in tertiary education.

EAPN Romania states that in terms of integration of other marginalized groups the Romanian government has no clear strategy and is in process of developing a new strategy, updated in relation to the EU requirements, especially for refugees.

In Slovakia, more money goes to non-direct costs (operating and personal costs), less money to real social changes for marginalized groups.

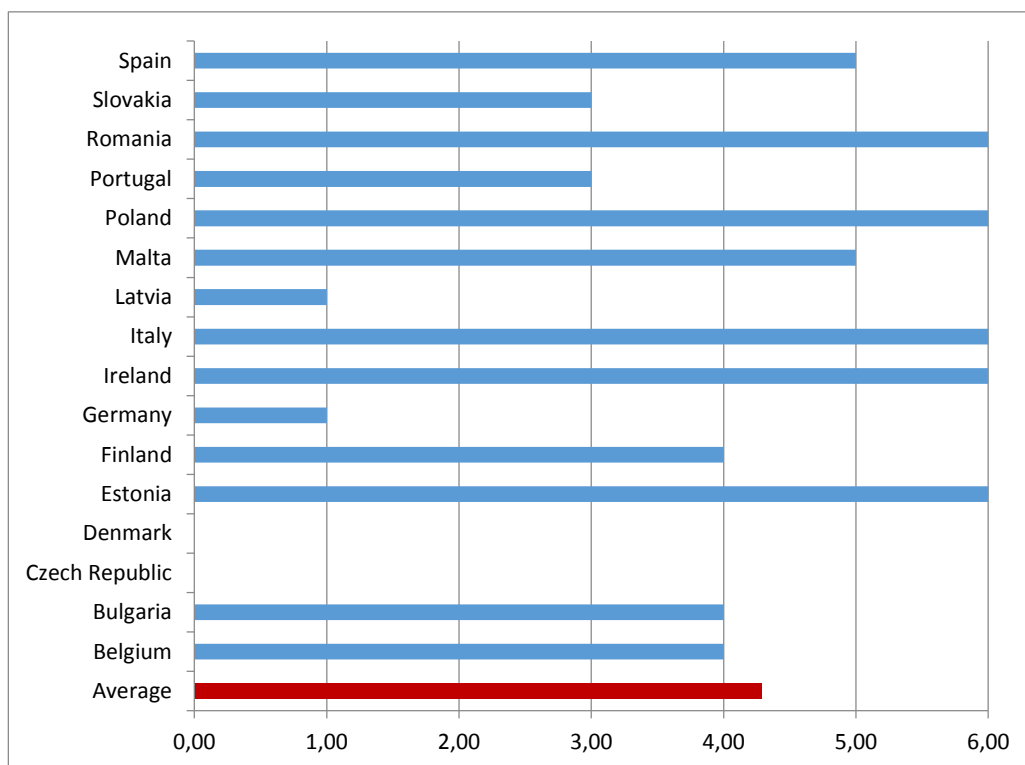
¹⁵ <http://www.integration.ie/website/omi/omiwebv6.nsf/page/funding-fundforintegration-esfepic-en>. Further details on the new programme: <http://www.esf.ie/en/ImageLibrary/Repository/Files/PR-2-7-AIP-Integration-of-Migrants-CMA-ESF-2014-201.pdf> .
<http://www.esf.ie/en/About-Us/ESF-Programme-PEIL-2014-2020/>

¹⁶ <http://www.depaulireland.org/our-services/criminal-justice-services/tus-nua-apartments/> Further details see:
<http://www.esf.ie/en/ImageLibrary/Repository/Files/PR-2-8-AIP-Tus-Nua-esf-2014-201.pdf> .

5 – ACCESS TO HEALTH AND SOCIAL SERVICES OF GENERAL INTEREST

5.1 – The existence of a national or regional strategic policy framework for health

Graphic 27 – Position of the countries concerning a national or regional strategic policy framework for health

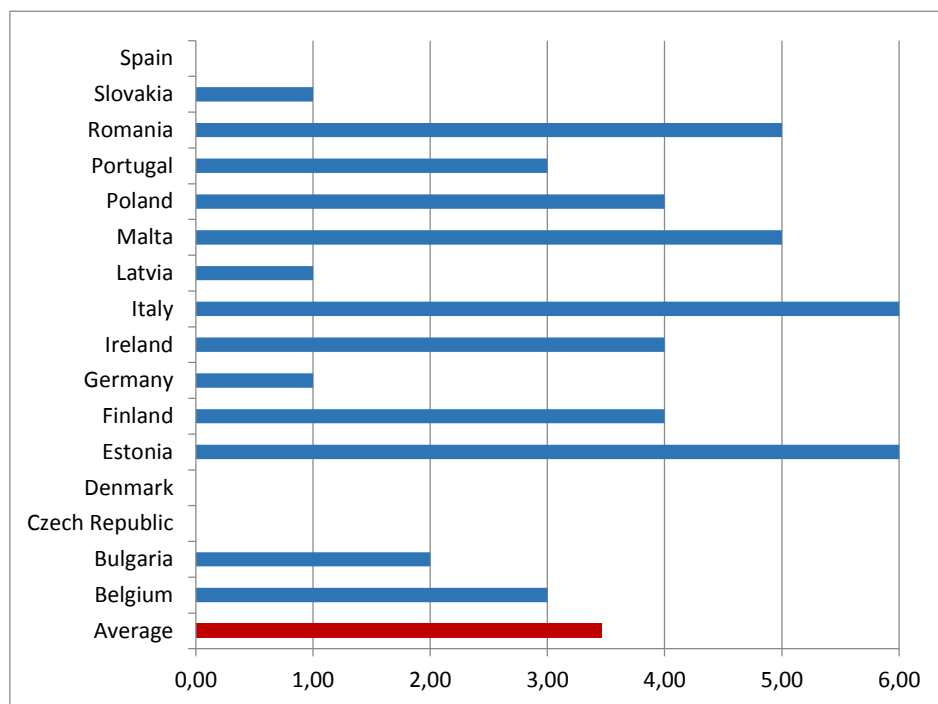


In this issue we can see that many networks scored very well with 6 (5 networks), with 5 two networks and with 4 three networks. The average is above 4. We have two networks that positioned in 1 (Germany and Latvia).

5.2 – The strategy has explicit measures:

- To facilitate the access of care, with quality and with affordable prices to all people throughout the life cycle

Graphic 28 – Position of the countries



On this question we have an average above 3 and 3 networks did not answer: Spain, Denmark and Czech Republic.

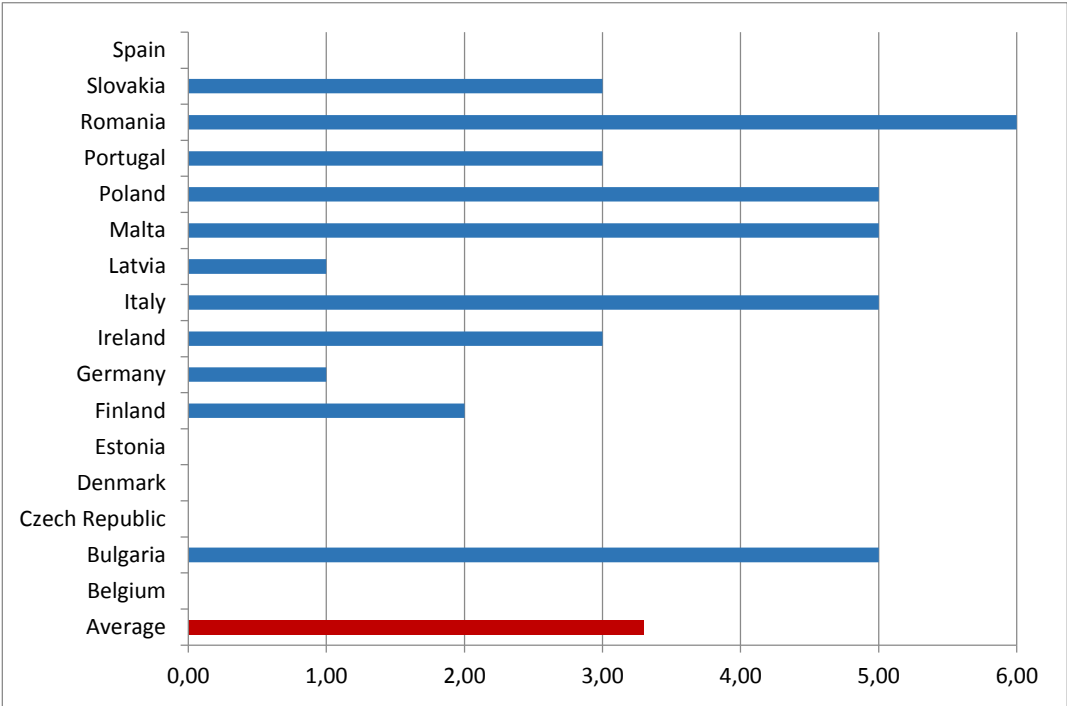
- **To ensure the access of key target groups**

In the questionnaire we have asked networks to identify key target groups: the elderly people and their families was selected by 8 networks: Bulgaria, Estonia, Finland, Italy, Malta, Poland, Portugal and Romania. The other target group selected was: Children and their families and here we have the same eight countries. The third target group was: people with disabilities/with the long term health problems /people with mental illness and nine networks selected this option: Bulgaria, Estonia, Finland, Italy, Latvia, Malta, Poland, Portugal, Romania. Ethnic minorities and migrants were selected by Bulgaria, Italy and Slovakia. Substance abuse and drug users were a target group selected by the following countries: Bulgaria, Estonia, Roma, Malta, Ireland and Italy. Four countries selected other groups: Bulgaria, Ireland, (Travellers) Latvia (Poor), Slovakia.

5.3 - The improvement of access to health care and satisfaction with the activities funded:

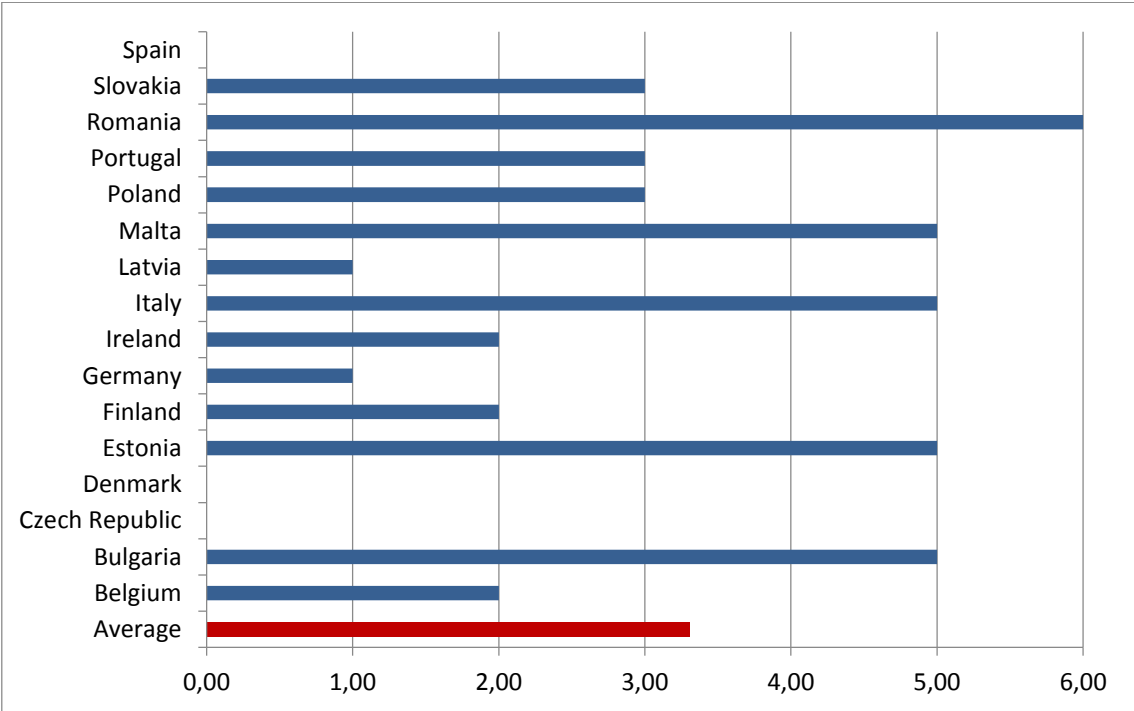
- In the PA:

Graphic 29 – The existence of a section in the PA on the improvement of access to health care



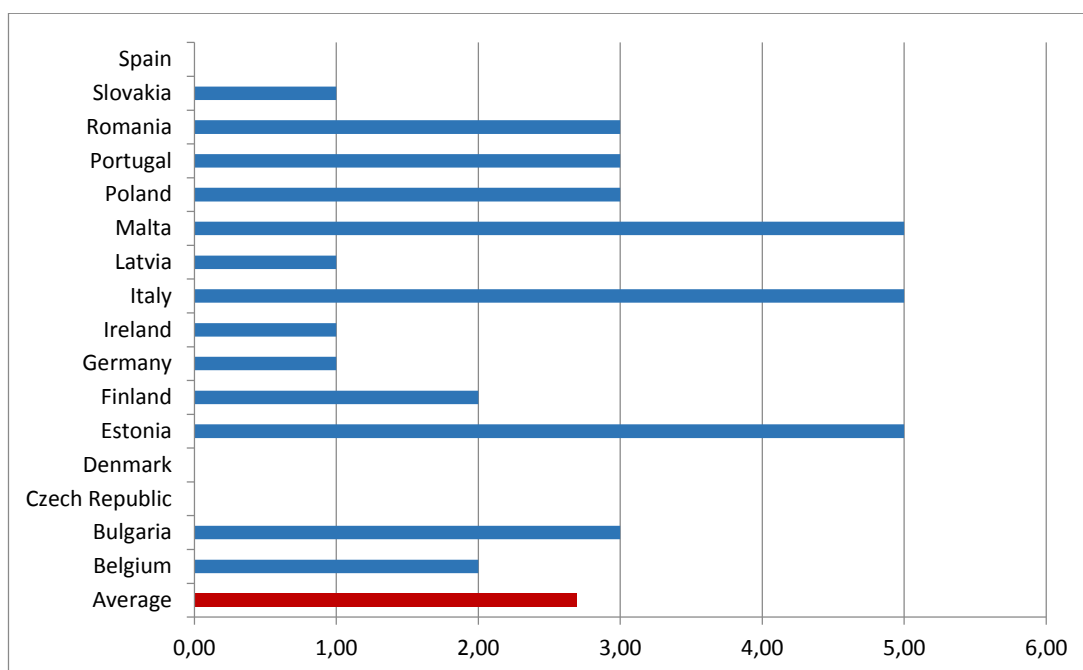
- In the OPs:

Graphic 30 - The existence of a section in the OPs on the improvement of access to health care



At these two questions we have an average above 3 and we have 4 scored in 5 (Poland, Portugal, Italy and Bulgaria). Romania had scored in 6.

Graphic 31 –Level of satisfaction with the activities funded under this heading



In terms of this question we see that the satisfaction is below 3 even with 3 countries scoring at 5 (Malta, Italy and Estonia).

5.4 – Summary of remarks on the Access to health and social services of general interest

Several networks do not add further information like Estonia, Germany, Denmark, Latvia and Czech Republic. The other countries that add information talk about the existence of national strategies in the area of health and the access to healthcare as a universal right (Italy; Malta). In Spain the access to healthcare used to be universal, but currently, and through a health card the access to healthcare is universal for only: employees and self-employed and their families (wives/husbands and children); unemployed, while receiving unemployment benefits and afterwards, if registered in the employment office; minimum income recipients and other benefits.

Since last years' budget cuts, the access to the healthcare system has been limited in some regions for extra-EU undocumented migrants. The access for this group is only granted for emergencies (for all), pregnant women and children (some regions have disregarded this directive and continue to give health assistance to all). EU and non-EU residents, who do not have a health card, must demonstrate that they do not have sufficient economic resources, to have free access to the Spanish health system.

In Portugal, the access to healthcare is also universal but with the crisis some vulnerable groups like elderly revealed serious difficulty in affording basic health costs (buying medicines, for example). We have also effects of the crisis on mental health, namely the increase in the rate incidence of depression, alcohol and cannabis abuse, as well as the lack of any intervention plan to deal with the crises consequences. It doesn't seem that the OP has taken some of these considerations.

In Bulgaria a National Health Strategy to 2020 was adopted, however it was not enough to convince Commission services that the necessary strategic framework is in place. On this basis, it could be concluded that the planned support through EU funds to improving the access to quality health services is endangered by the lack of clear strategic framework.

In Finland, the reform of social and health care services has been delayed, but they are trying to do it with this government in next 3-4 years, and one of the key issues is how to guarantee the access to quality health and social services across the world?

Also Ireland has a Healthy Ireland Strategy 2013-2025 – A Framework for Improved Health and Wellbeing. It recognizes the need to address health inequalities for particular groups and communities

and for the empowerment of people and communities in relation to health. However, there are issues with implementation.

The issue of health is covered in the Partnership Agreement as an issue impacting on those distant from the labour market e.g. people with disabilities and Travelers and also for women. However, the main focus is in relation to ICT and e-health. Addressing health in the Irish OPs is therefore limited to exploiting e-health technologies in the ERDF OP as an action under the thematic objective of Enhancing access to, and use and quality of, ICT.

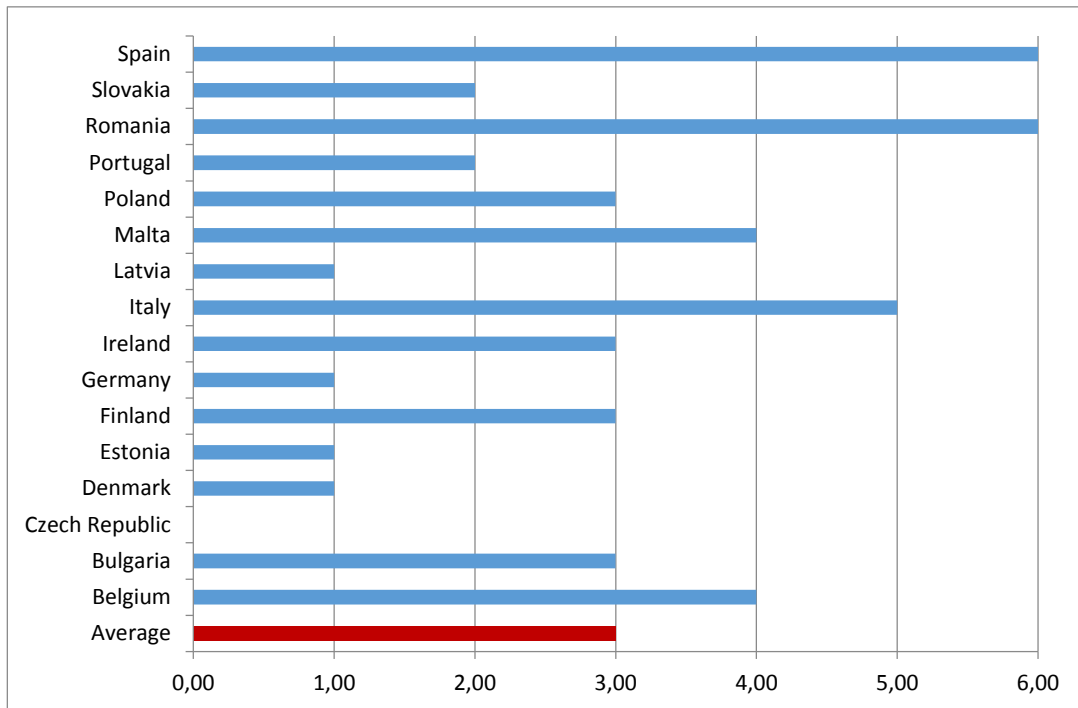
In Poland, there is a Polish Policy Paper on health and OPs will contribute to more accessible and quality health care for people experiencing poverty. In Belgium, the perspective on everything is labour market orientated, the OP even says literally: *“even an integrated policy for groups as Roma demands more research..., projects related to housing and health care, this program will limit its focus in the first place to projects related to employment and education”*. In activation projects for vulnerable long-term unemployed, there is some attention for health care, but not sufficient.

EAPN Romania stated the main focus of strategy for access to health and social services of general interest is related to children and families and access of Elderly people and their families.

6 – PROMOTING ACCESS TO SUSTAINABLE AND QUALITY EMPLOYMENT

6.1 – The access to quality employment for people who are excluded from the labour market in the PA

Graphic 32 – Position of the countries



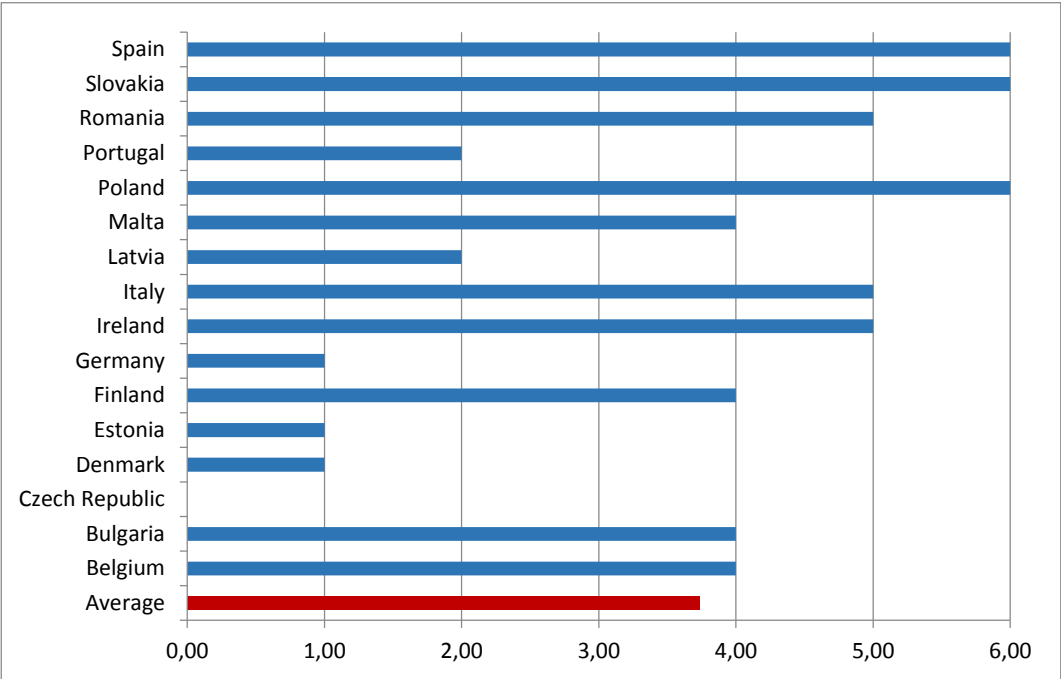
In terms of this question (this is a question of multiple choice) there are two countries that scored 6 (Spain and Romania) and one that scored 5 (Italy). But there are also 3 countries that scored 1 (Germany, Estonia and Denmark).

Nine countries selected *“Women”* as the priority group e.g. Bulgaria, Denmark, Ireland, Italy, Malta, Portugal, Romania, Slovakia and Spain. The other group was: *“Young people”* and from 16 networks 13 chose this option: only Germany, Check Republic and Estonia did not. The other group was *“Disabled”*, with eight networks affirming that the Partnership Agreement of their country considered this group. The *“Long term sick”* is a group identified by four networks: Bulgaria, Denmark, Malta and Romania. *“Long term unemployed”* was selected by 13 networks; and *“older people”* by five networks (Bulgaria, Latvia, Malta, Romania and Slovakia). *“Ethnic minorities”* is a group selected by six networks and *“migrants”* by eight.

6.2 – The implementation of these strategies and satisfaction with the activities funded:

- **In the PA**

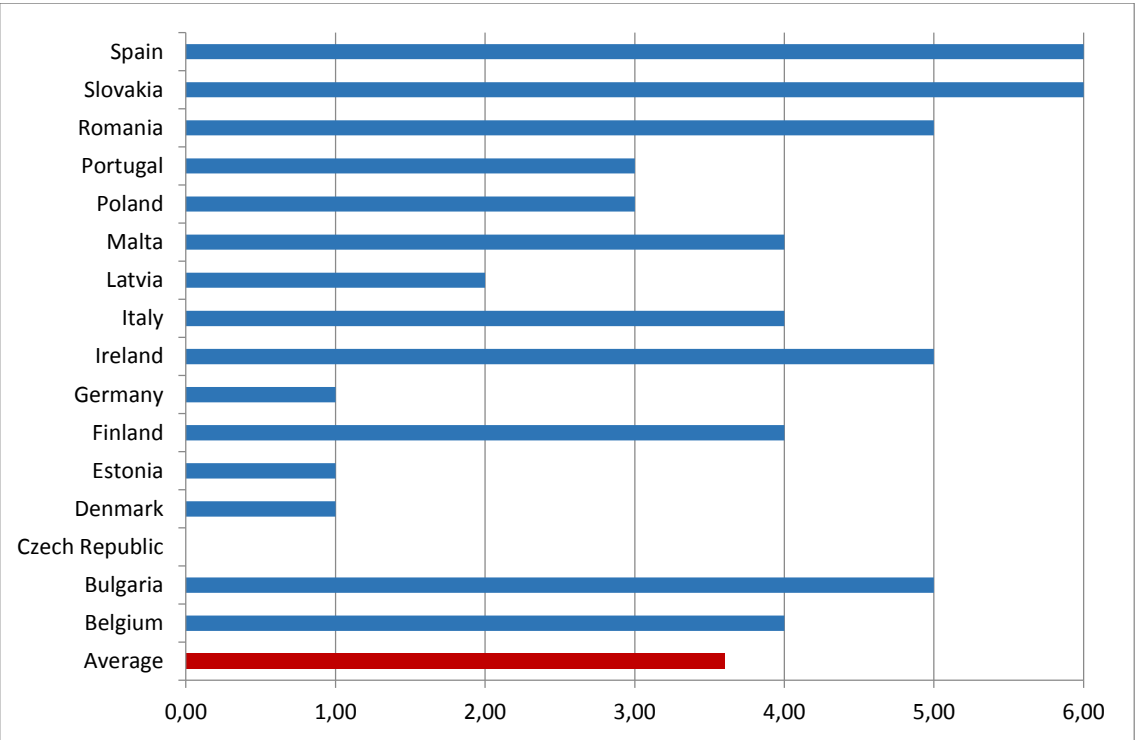
Graphic 33 – The existence of a section in the PA on the implementation of these strategies



In this question we can see that the average is above 3 and three countries scored at 6 (Spain, Slovakia and Poland and two countries scored at 5 (Italy and Ireland).

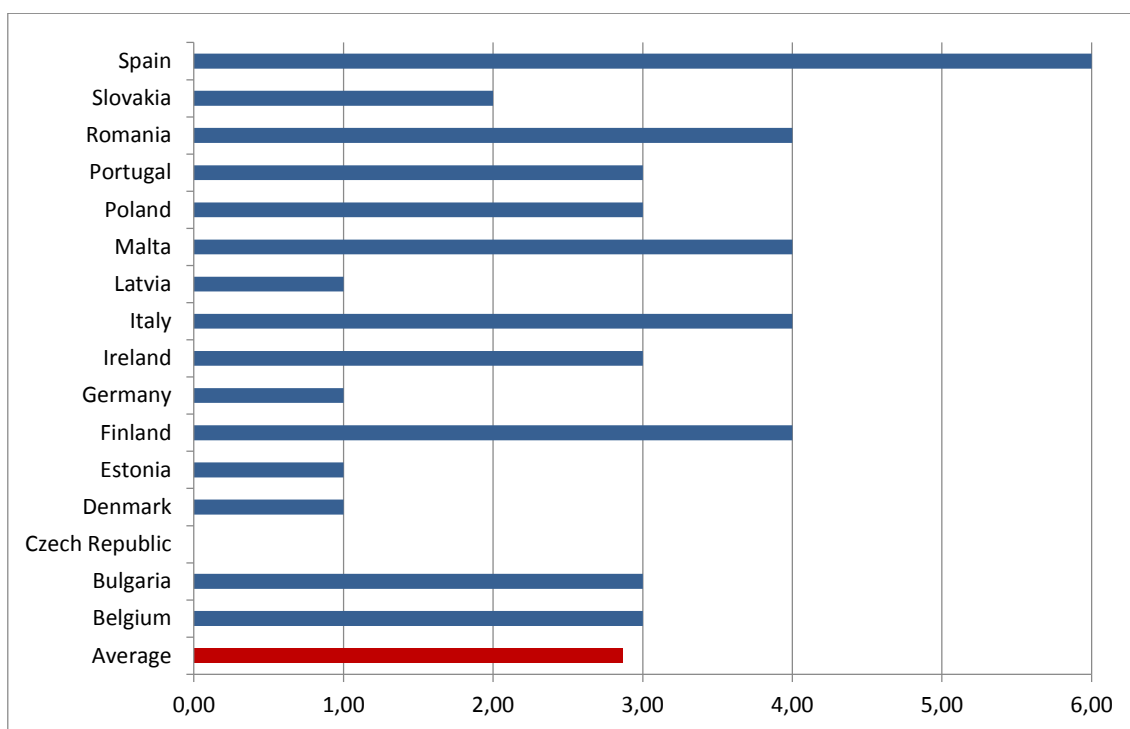
- **In the OP's**

Graphic 34 – The existence of a section in the OP on the implementation of these strategies



In this question there was also an average above 3. Three countries have scored at 1 (Estonia, Denmark and Germany).

Graphic 35 - Level of satisfaction with the activities funded under this heading



When we ask the networks about the degree of satisfaction the average drops to below three. Only Spain maintains a high score. This data can be explained through the following open question.

6.3 - Promoting access to sustainable and quality employment

In this section some networks did not respond with further information: Germany, Finland, Malta; Denmark and Czech Republic. Many networks sustain that the issue of Employment and Training is mentioned in the OP's, but the big issue is the **quality of the employment**. Estonia, Portugal, Bulgaria, Poland, Belgium, Latvia, Slovakia are in this group and the reasons are varied: low incomes; precariousness; over focus on activation measures; priority to economic aims and not to the needs of people. Some examples:

Portugal: In general, incomes are low and with the crisis precariousness has increased. The measures of the Operational Programme will further encourage this precariousness, creating turnover and not quality in employment. The final aim is decrease the numbers of unemployed in Portugal, especially youth unemployment. Internships in the work place, for example, is used as a strategy to cover jobs for which people should be hired. At the same time, the work that is created sometimes is low paid and does not guarantee an adequate income to people and, in the same line, does not guarantee adequate social inclusion.

Bulgaria: The ESF will support almost all possible types of active labour market services, including support to starting self-employment. However, taking into account that all good intentions can be easily ruined by bad decisions at the implementation phase, the challenge is how operations will be designed, i.e. what kind of eligible actions (and combinations there of) will be supported. Another basic problem is the very low labour incomes ie wages and salaries (minimum and average), are not consistent with labour productivity.

Ireland: Priority 1 is Promoting sustainable and quality employment and supporting labour mobility. It is not clear however how the issue of quality employment is to be addressed. The focus of the ESF OP is to increase the employment and labour market participation of those who are long-term unemployed and distant from the labour market. While different groups are named there is a particular focus on young people through the Youth Employment Initiative.

The third priority is Investing in education, training and vocational training for skills and lifelong learning which again prioritizes disadvantaged groups with people with disabilities and low skilled adults being

specifically mentioned. There is also a specific measure for ex-prisoners/offenders. The measures to be funded under the Structural and Investment Funds, particularly the ESF OP must be part of a wider programme to address the issue of ensuring access to quality employment for people distant from the labour market.

Belgium: Activation stays the central focus, and a lot of money is used for the so-called social economy, where it does not always benefits the employees, and does not take into account sustainable and quality employment.

Latvia: The State agency provides different offers which are not connected to business and/or market interests. People are provided with subsidies/allowances during the training process.

Slovakia: The needs of the people are not accepted. The priority is economic aims, often without social changes to support the direct integration of target groups. It is not possible to implement this in all parts of the economy (e.g. agricultural, domestic products, domestic production ...). It is also implemented without monitoring by stakeholders.

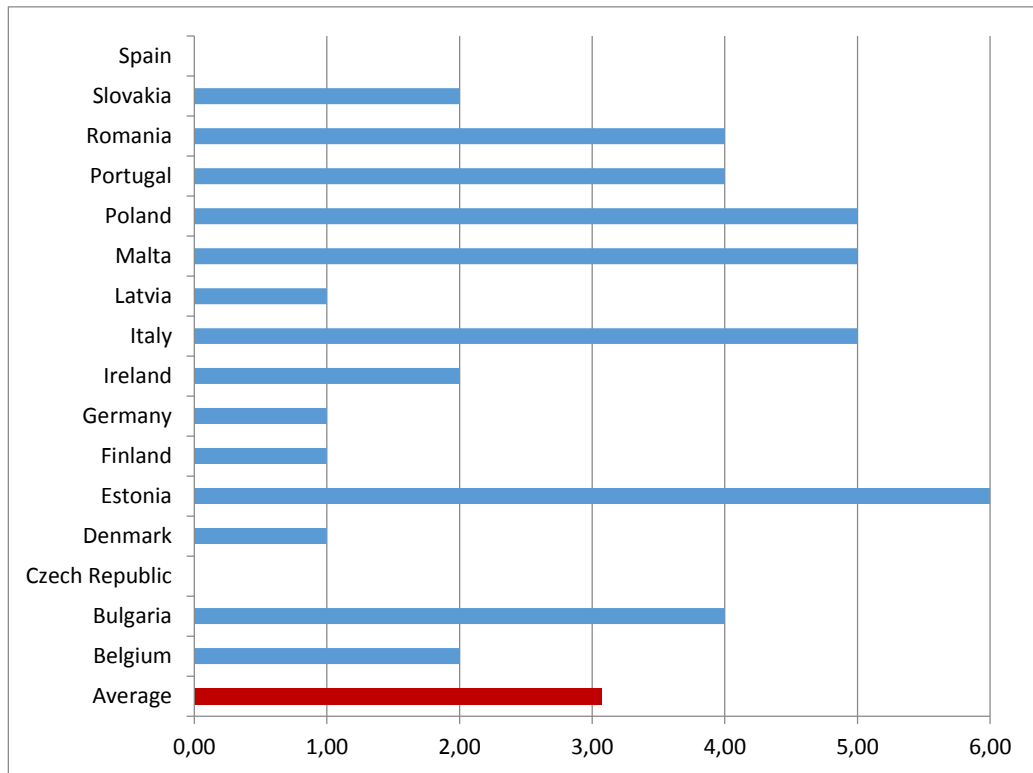
Romania: The theme **of Promoting access to sustainable and quality** employment is related with the following themes included in the PA:

- Promoting competitiveness and local development, with a view to reinforcing the sustainability of economic operators and improving regional attractiveness;
- Developing human capital, by increasing the employment rate and tertiary education attainment, but also tackling the severe social challenges and poverty levels, in particular for deprived or 43 marginalized communities and in rural areas;
- Developing physical infrastructure, both in ICT and the transport sector, in order to increase the accessibility of Romanian regions and their attractiveness for investments;
- Encouraging sustainable and efficient use of natural resources through promotion of energy efficiency and a low carbon economy, protection of the environment and adaptation to climate change;
- Building a modern and professional public administration by means of a system reform aimed at overcoming the structural governance shortcomings.

7 – ENHANSING ACCESS TO AFFORDABLE, SUSTAINABLE HIGH QUALITY SERVICES

7.1 - Does the PA/OP's in the section on social inclusion/poverty improve access to services for disadvantaged groups?

Graphic 36 – Position of the countries

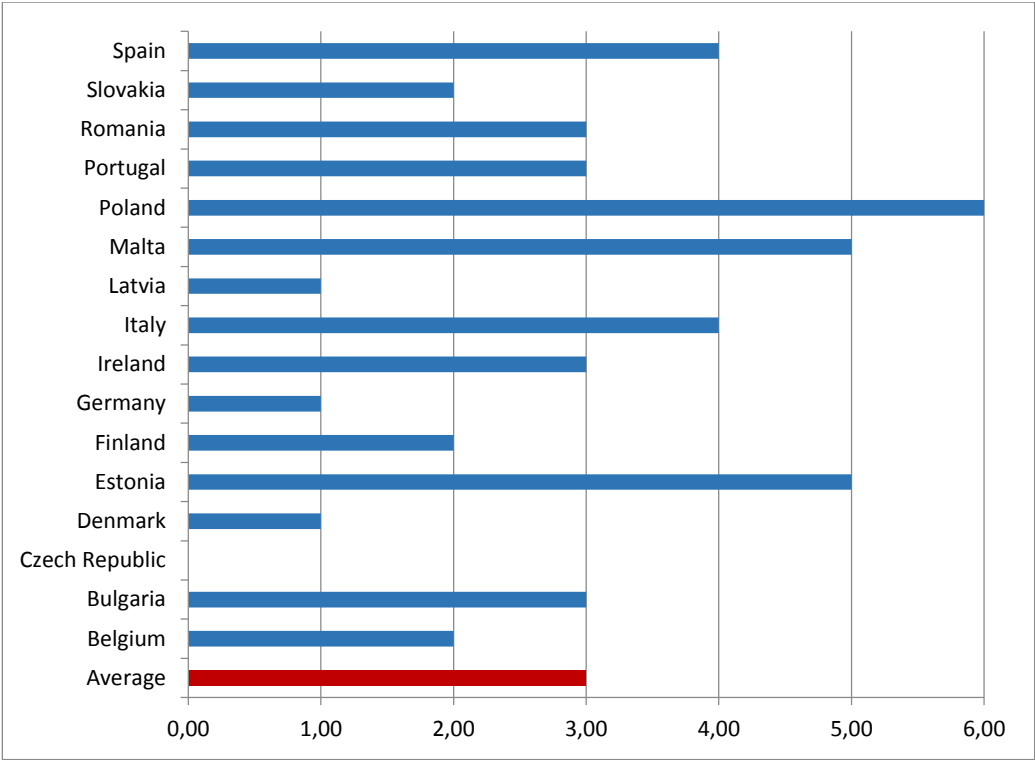


For this question we have a score of 3 approximately. Only Estonia scored at 6 and other three networks scored at 5 (Poland, Malta and Italy).

Networks were asked about the kind of services that have been improved. In terms of social services, nine networks have selected this option, education have been selected by nine networks also. In terms of “housing” seven networks selected this option. The option that has the highest score is Employment with twelve networks and childcare is selected by seven networks. Poland and Slovakia chose “Others”, but did not specify.

7.2 – Countries satisfaction with the measures funded under this heading

Graphic 37 – Level of satisfaction with the measures funded under this heading

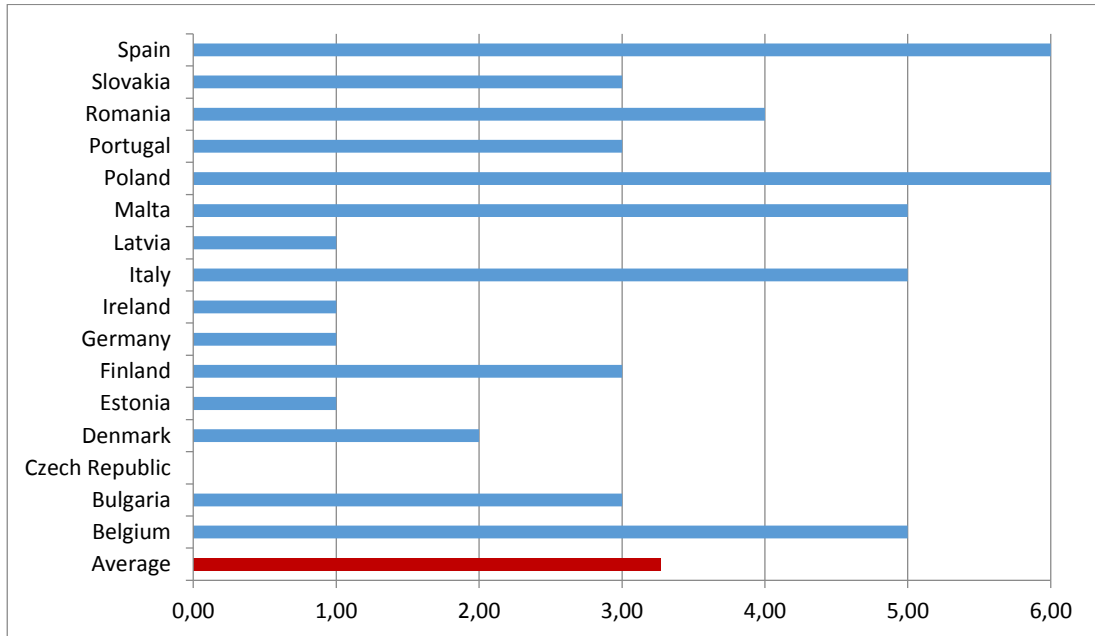


8- PROMOTING SOCIAL ENTREPRENEURSHIP/ECONOMY AND VOCATIONAL INTEGRATION IN SOCIAL ENTERPRISES

8.1 – To what extent the PA/OP's support:

- **Social Economy:**

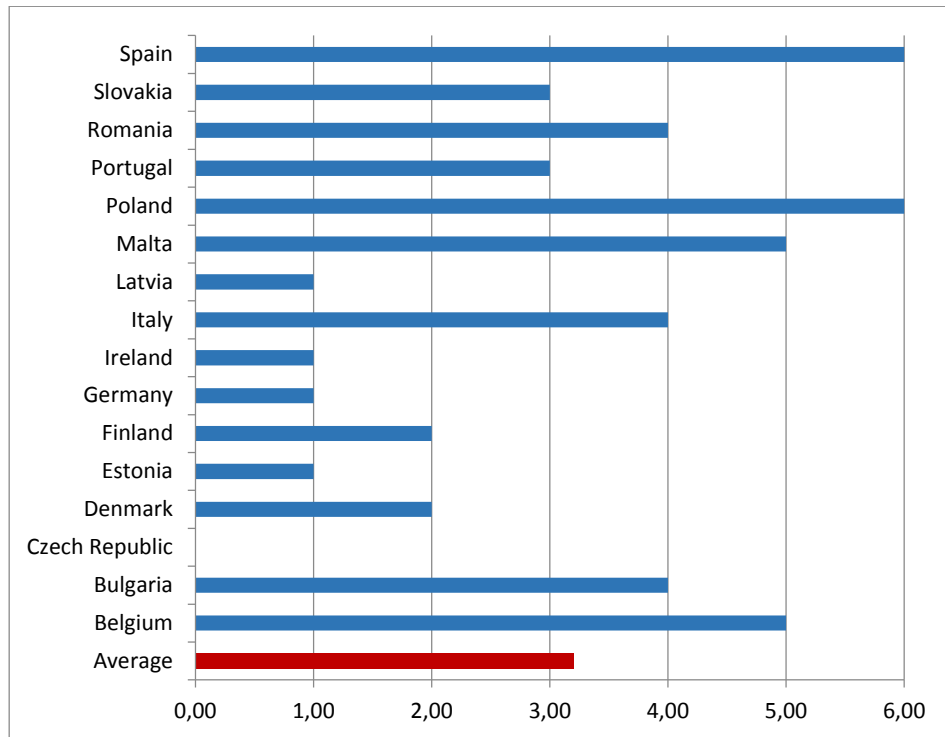
Graphic 38 – Position of the countries



Relating to this question the average is above 3 and Spain and Poland scored with 6 and Malta, Italy and Belgium with 5.

- **The integration of disadvantaged groups in social enterprises or social economy initiatives**

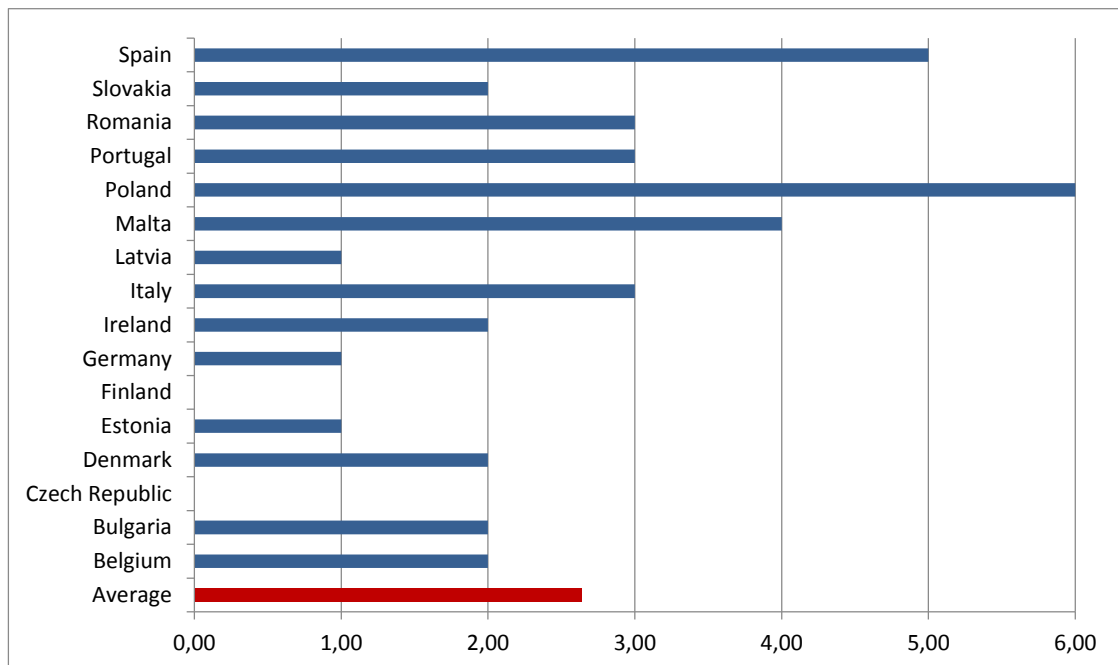
Graphic 39 - Position of the countries



On this question we have also a similar position of the networks.

8.2 – Countries satisfaction with the measures funded under this heading

Graphic 40 - Level of satisfaction with the measures funded under this heading

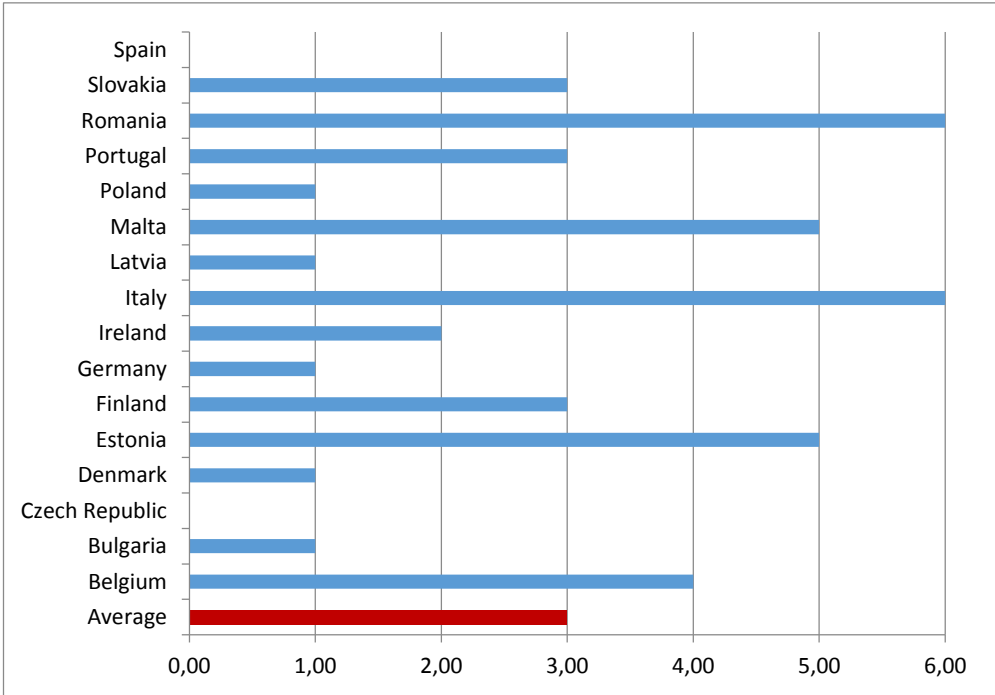


When networks were asked about their satisfaction with the measures funded under this heading the average decreases. Three networks scored at 1 (Latvia, Germany and Estonia) and four scored at 2 (Slovakia, Ireland, Denmark, Bulgaria and Belgium).

9 – COMMUNITY LED LOCAL DEVELOPMENT STRATEGIES (CLLD)

9.1 – Community led local development strategies are being put in place

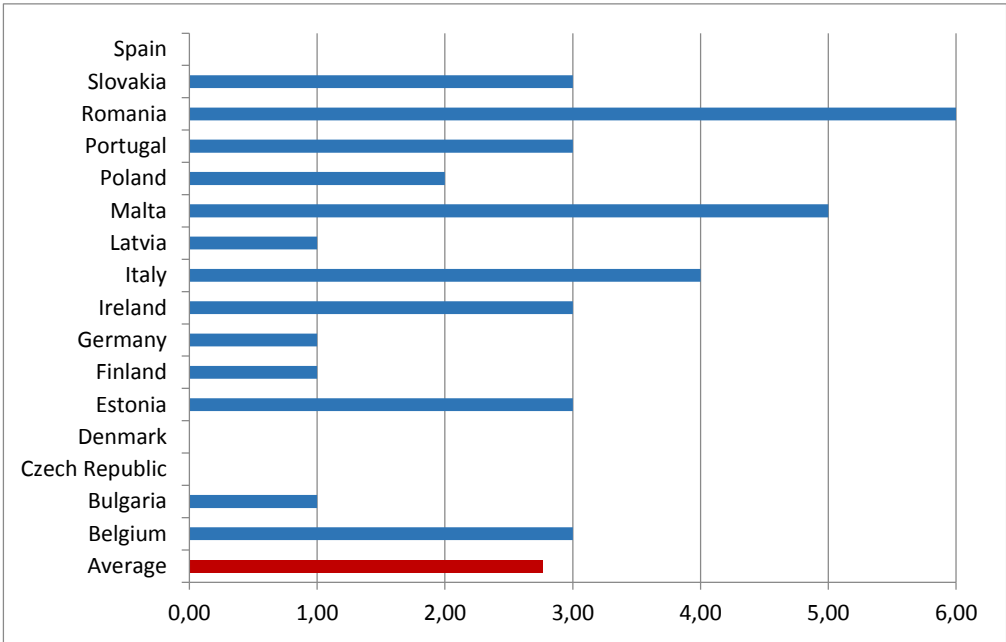
Graphic 41 – Position of the countries



In terms of this first question related to the issue of CLLD the average is 3 and countries like Estonia, Italy and Romania gave a very high score. (5 and 6)

9.2 – Contribution of the strategies to promote poverty and tackling social inclusion

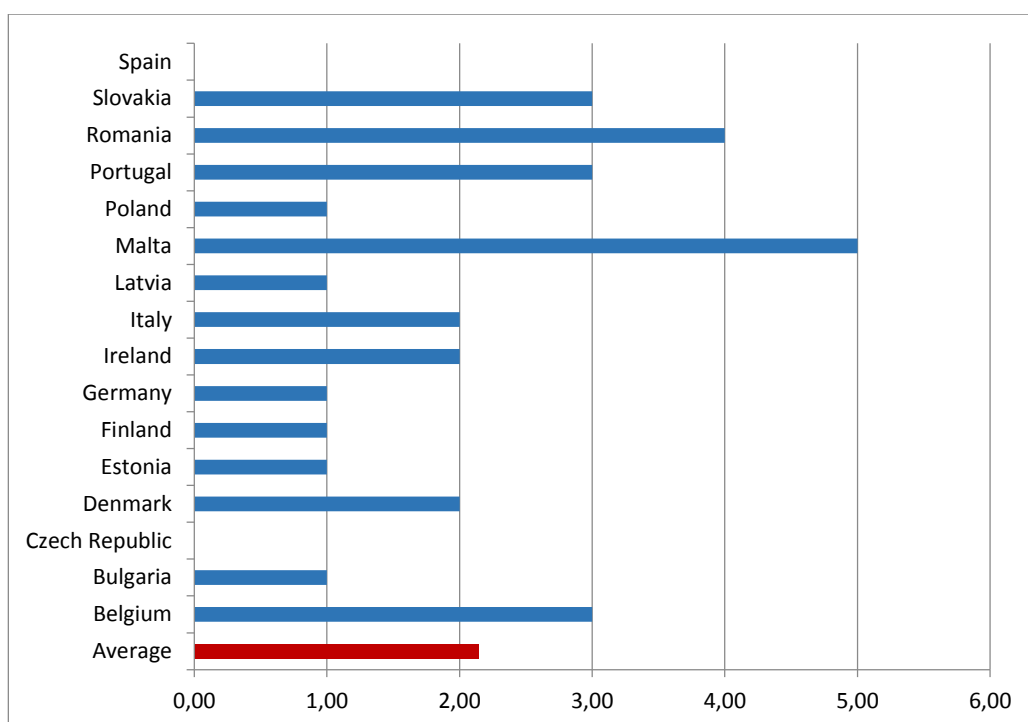
Graphic 42 – Position of the countries



On this question there appears to be considerable agreement that these strategies do not contribute sufficiently to tackle social inclusion; the average is below 3 and only Romania scored with 6.

9.3 – Antipoverty NGO’s as active partners

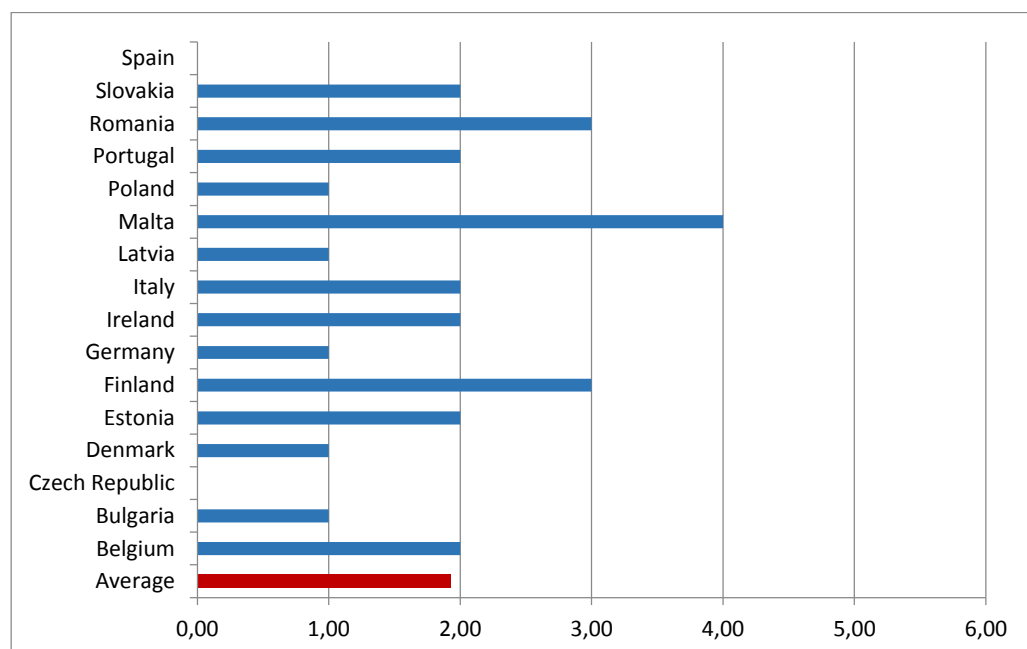
Graphic 43 – Position of the countries



In terms of the partnerships of the Anti-Poverty NGO’s the majority of networks scored very low; with six networks that scored 1 and two non-answers (Spain, Czech Republic).

9.4 – Countries satisfaction with activities funded under this heading

Graphic 44 - Level of satisfaction with the activities funded under this heading



In this field we can see that the level of satisfaction in the networks is very low. There are five networks that scored 1 and six networks that scored 2.

9.5 – Summary of remarks on Community Led Local Development strategies (CLLD)

In terms of this issue some networks do not have any additional information: Estonia, Germany, Finland, Denmark, Belgium, Latvia and Czech Republic. The others give varied responses.: for instance in Spain, these measures are not included, in the national OPs .

Portugal: “It is an innovative initiative that could potentially be interesting to develop new territorialized strategies to combat poverty and social exclusion. The project selection process was not very transparent and the rules of implementation also seems not be very well defined. However, we put some expectations in this initiative and the EAPN Portugal participates as a partner in various projects in different districts.”

Bulgaria: “The Bulgarian Partnership Agreement envisages that 5% of the European Agricultural Fund for Rural Development and 17% of the European Maritime and Fisheries Fund will be devoted to Community-led local development strategies. Moreover, 5% of the European Social Fund and 5% of the European Fund for Rural Development shall be earmarked for the same activities. However, no actions to utilize the earmarked funds have been undertaken so far. There is legal uncertainty; it is not clear how ESF and ERDF will complement EAFRD funding and what territorial approach will be followed.

Ireland: Community Led Local Development is outlined in the PA as the means through which the LEADER Programme (under the Rural Development Strategy) would be implemented.

Poland: Only 2 regional OPs of 16 contain CLLD measures. Despite heavy effort made by NGOs involved in similar initiatives in the past (LEADER and previous agricultural OP) there was no government support for that idea and they did not push regions to implement it.

Slovakia: It is a paper document. Without responsibility for its implementation.

Romania: The specific objectives of CLLD in Romania are related to: Smart growth, by increasing competitiveness especially in less developed regions; Inclusive growth, by promoting employment and improving people's well-being; Green growth, by protecting and enhancing environmental quality.

Territorial challenges and disparities will also be addressed through the local development instruments. Community Led Local Development (CLLD) will be implemented in rural areas (LEADER), deprived areas within urban centers and fisheries and coastal areas where there are fisheries activities and aquaculture farms, while dedicated Integrated Territorial Investment (ITI) will support the Danube Delta. Metropolitan growth poles and urban centres will also be supported through integrated strategies and Romania will continue to actively support the development of the Danube Strategy.

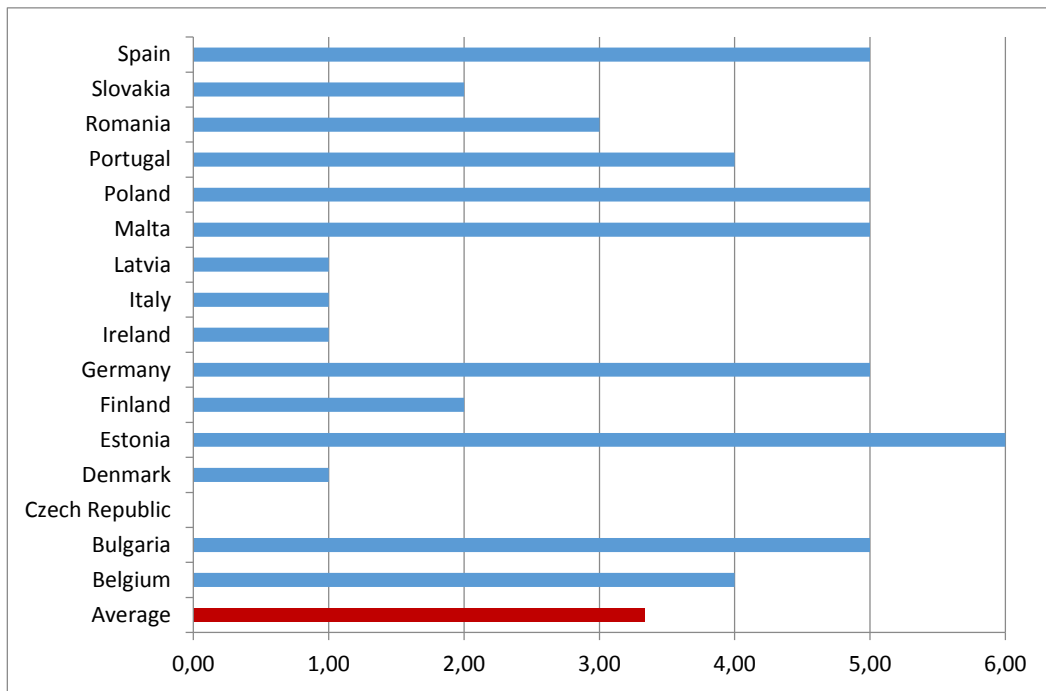
General ex-ante conditionalities

In this section we intend to assess the implementation of the General Ex-ante conditionalities of the European Structural and Investment Funds based on the Guidance on Ex ante Conditionalities for the European Structural and Investment Funds of European Commission and The General and specific ESF Regulations.

10 - ANTIDISCRIMINATION

10.1 – The elaboration of a national plan/strategy on anti-discrimination

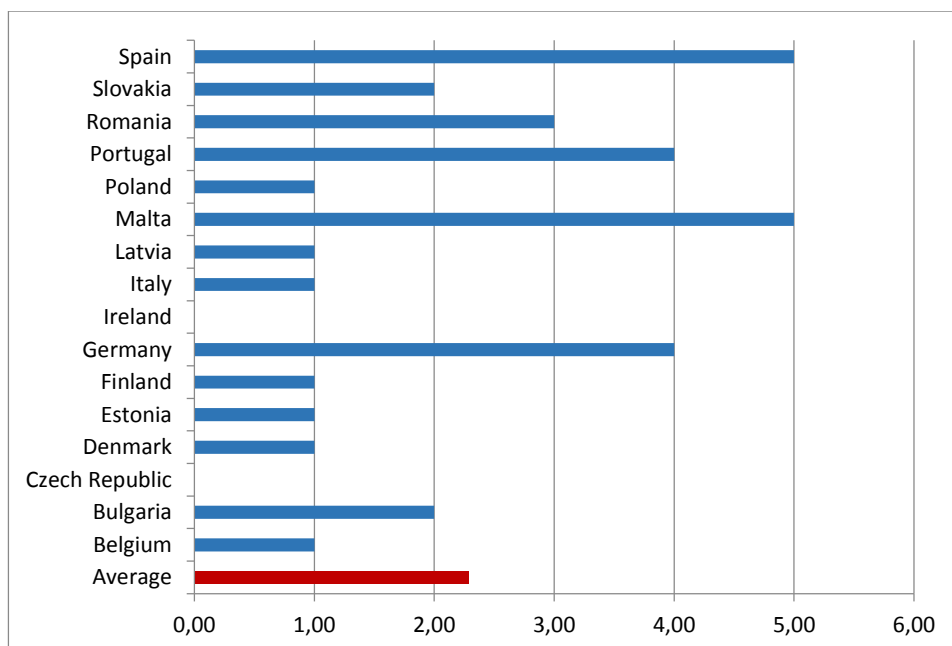
Graphic 45 – Position of the countries



From the graphic we can see that in most of the countries there is an anti-discrimination strategy. But there are 4 networks that scored very low: 1 (Latvia, Italy, Ireland and Denmark).

10.2 – Involvement of National Networks in the drafting of the Anti-discrimination Plan/strategy

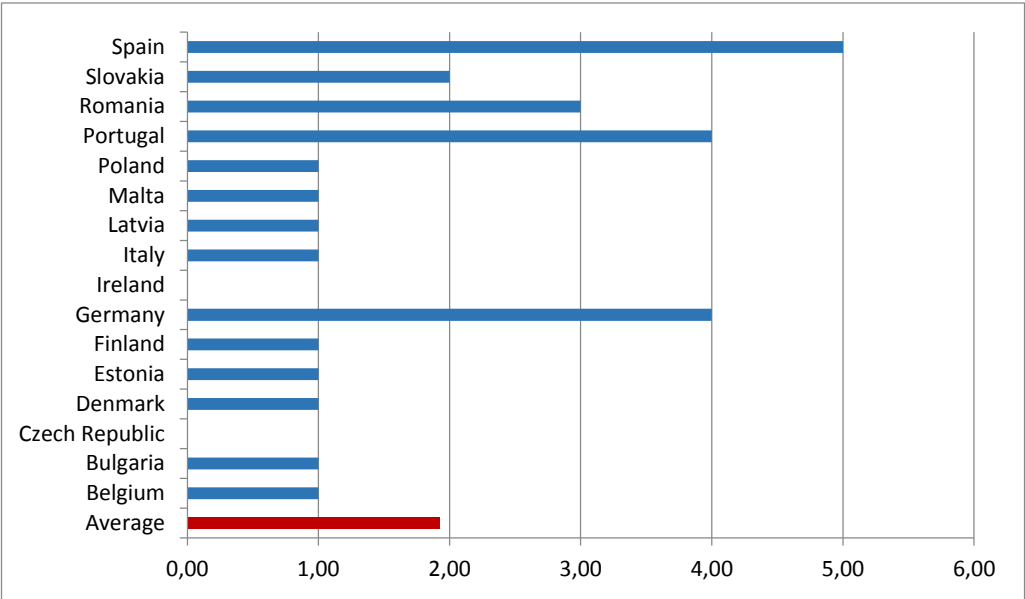
Graphic 46 – Level of involvement of NN



The assessment is generally very low regarding the involvement in the drafting of the Antidiscrimination Plan/Strategy, with seven networks scoring 1.

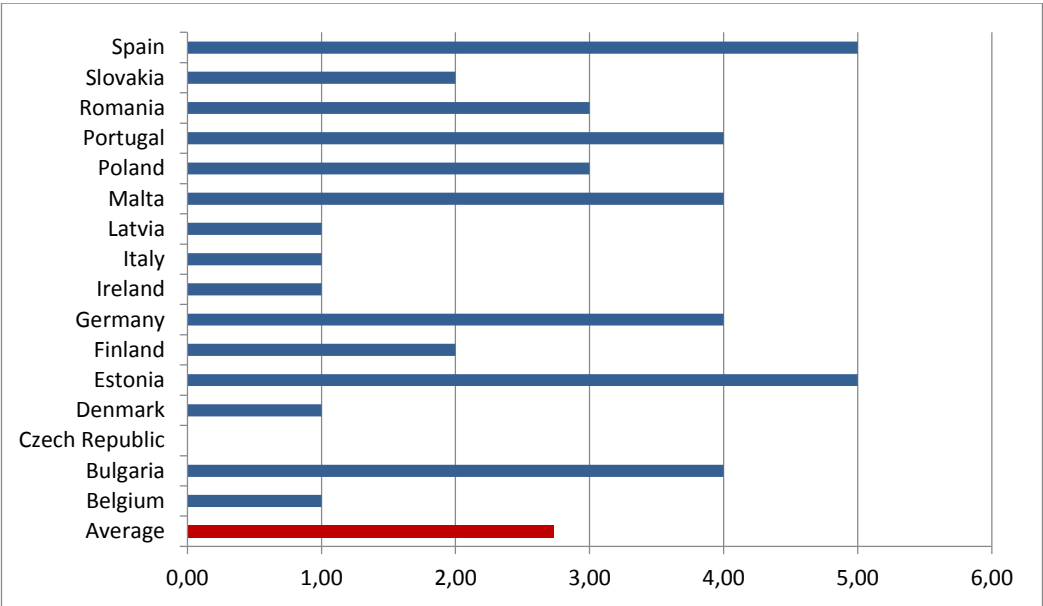
10.3 – Participation of National Networks in the implementation of the Anti-Discrimination Plan and level of satisfaction with the activities funded

Graphic 47 – Level of participation of National Network (NN)



The level of participation is also very low and with only countries like Spain, Portugal and Germany demonstrating a regular level of participation.

Graphic 48 – Level of satisfaction with the activities funded under this heading



In terms of satisfaction we cannot conclude that it is very good. The average is below 3.

10.4 –Summary of remarks on Antidiscrimination - Promoting access to sustainable and quality employment

On the issue of Antidiscrimination, several networks did not add any additional information: Estonia, Spain, Bulgaria, Finland, Denmark, Belgium, Latvia, Romania, and Czech Republic.

Germany: The subject of Antidiscrimination is a cross-cutting measure in the OP and must be addressed in each subprogram. Without a related contribution applicants get no funds because their application will be refused.

Portugal: In terms of antidiscrimination, Portugal has adopted the National Strategy for integration of Roma communities and EAPN Portugal participates in the body that monitors and evaluates the implementation of the Strategy. The Operational Programme could be an opportunity to develop the National Strategy and works in fields that are always very difficult: integration of Roma communities in the labour market. Equal opportunities and non-discrimination is also a horizontal principle alongside that of equality between women and men.

Ireland: Ireland does not have an anti-discrimination strategy. However it has a reformed Irish Human Right and Equality Commission the aim of which is to protect and promote human rights and equality in Ireland and build a culture of respect for human rights, equality and intercultural understanding across Irish society. Equal opportunities and non-discrimination is also a horizontal principle alongside that of equality between women and men.

Poland: Poland has a Strategy for Equal Treatment with anti-discrimination goals but only for the period 2013-2016. A Monitoring body was established very late in 2015 without NGOs representatives. There is another body established in 2013 for issues of anti-discrimination and racism with possibility of NGOs representation but there is no separate strategy for anti-discrimination.

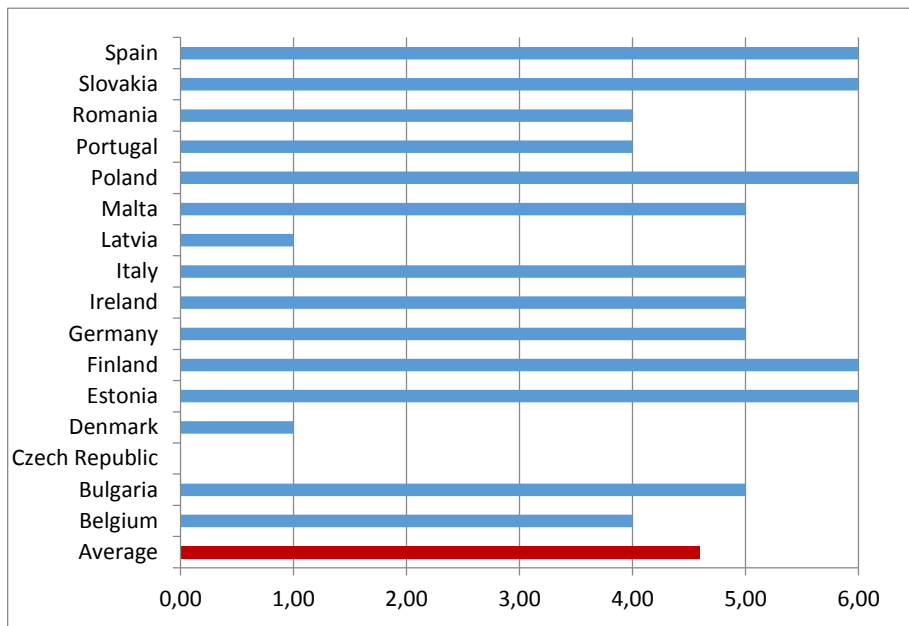
Italy: The TO n. 9 of the PA ("Promote the social inclusion, counteract poverty and every kind of discrimination) is relevant above all for the southern regions where the rights of citizenship of people at risk of poverty are less likely to be ensured. The discrimination of Roma people and target groups is also included in the OP.

Slovakia: It is not implemented. People who are discriminated against need to go alone to appeal to the court. Also the discrimination law forgot some groups.

11 – GENDER EQUALITY

11.1 – The elaboration of a national equality plan/strategy

Graphic 49 – Position of the countries

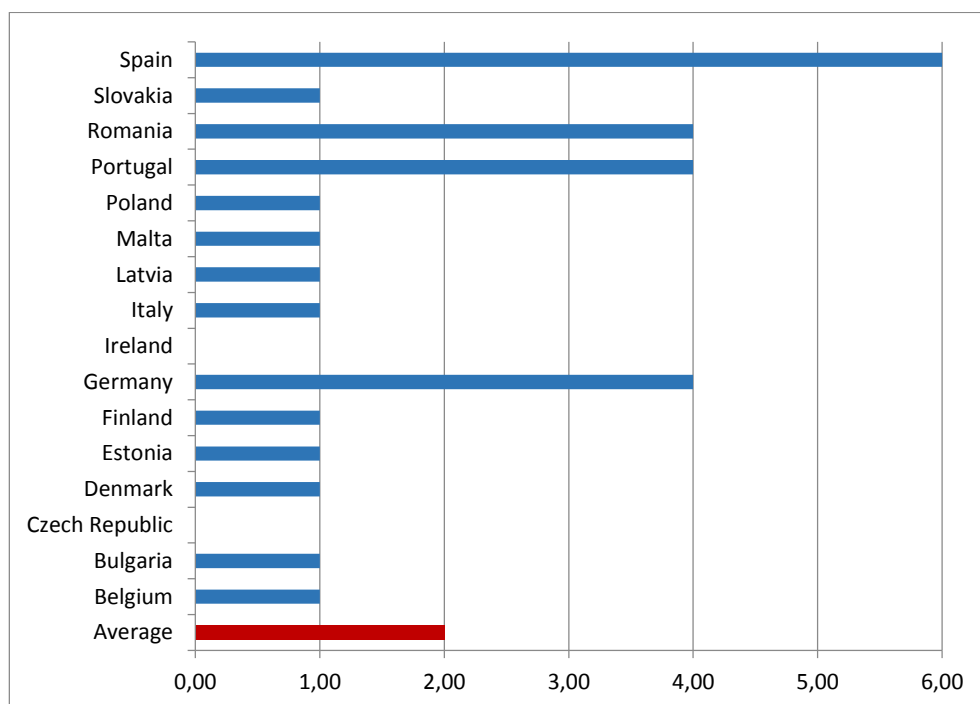


On this question most of the networks scored very highly and the average is plus 4. Spain, Slovakia, Finland, Poland and Estonia scored 6.

11.2 – Participation of the National Networks:

- In the drafting of the Equality Plan:

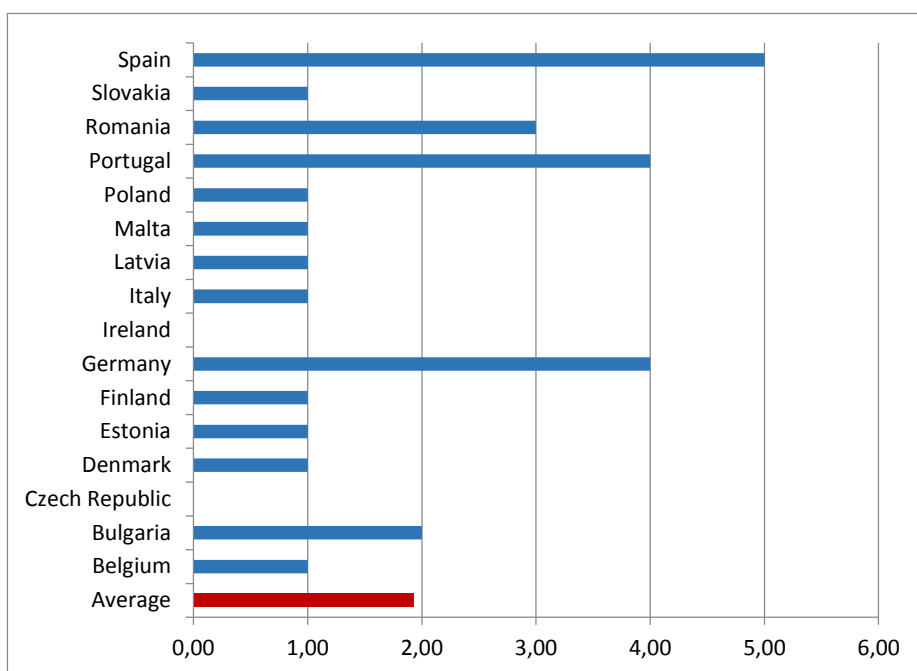
Graphic 50 – Level of participation of NN in the drafting



However, when the question talks of participation in the drafting of the Equality Plan, the score decreases considerably: the average is 2. Only Spain scored with 6 and Romania, Portugal and Germany scored with 4.

- In the implementation of the Equality Plan

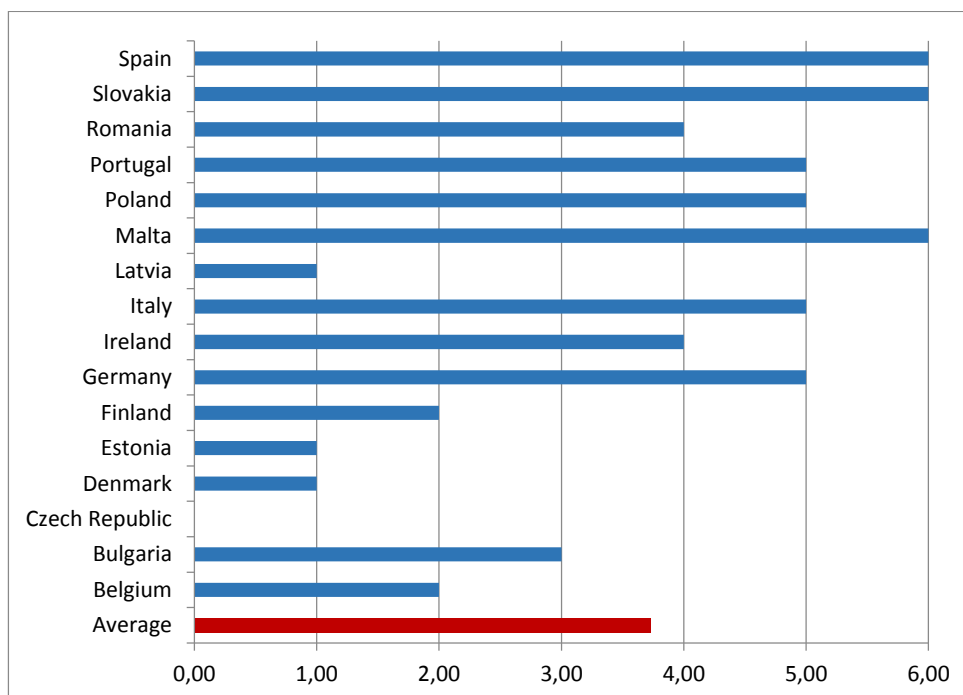
Graphic 51 – Level of participation of NN in the implementation



The involvement in the implementation is very low and only Spain and Portugal and Germany demonstrate some involvement. There are many networks that scored with 1 (Slovakia, Poland, Malta, Latvia, Italy, Finland, Estonia, Denmark and Belgium).

11.3 – The existence of a section in the PA and OP’s that focus on improvement of gender equality.

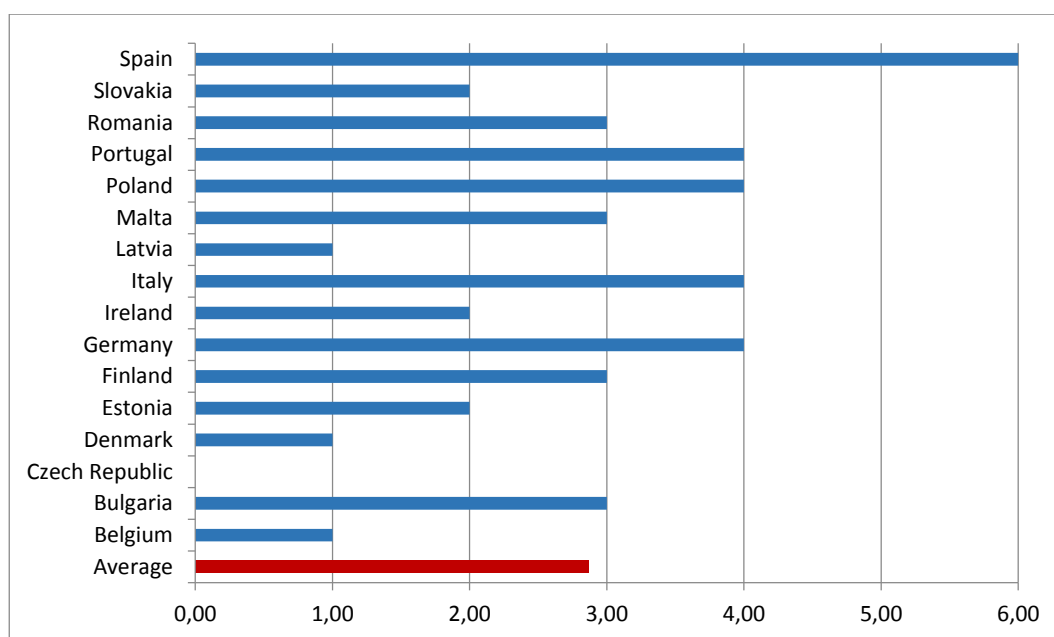
Graphic 52 – Position of the countries



In this question the average is above 3, which means that in many countries this issue is generally seen as taken into account in the Partnership Agreement and Operational Programmes.

11.4 – Level of satisfaction with the activities funded under this heading

Graphic 53 – Assessment by country



In terms of satisfaction the evaluation is very weak, only Spain scored with 6 and four networks scored with 4.

11.5 – Final remarks on Gender Equality

Related to Gender Equality many of the networks consider this issue is taken into account in their country. In some countries it is a cross-cutting question in the OP's like in Germany, Spain and also in Portugal. Poland and Slovakia highlighted a worst reality: Poland has a Strategy for Equal Treatment but only for the period 2013-2016. It covers gender equality amongst others issues. The monitoring body was established very late in 2015 without NGO's representatives. In Slovakia, the EAPN network consider that it is only a paper document and is only implemented in practice with some groups. In Estonia, there is an Equal Treatment Law and also a large section about gender equality in the Wellbeing Strategy (this is being completed currently), but in the OP and PA the topic is covered very vaguely and no separate measures are taken.

In Ireland, there is a National Action Plan for Social Inclusion 2007-2016, which is now being updated and extended to 2017. This Plan does not outline any specific gender issues but states that gender issues are addressed in the National Women's Strategy 2007-2016. Under the ESF OP Priority "*Combating all forms of discrimination and promoting equal opportunities*" there is an action to address gender equality. The aim of the activity is to support a cohort of women who are currently detached from the labour market, in order to assist their return. This will be done by offering them a locally-delivered development course which will comprise a series of training opportunities focused on self-development and work-related skills.

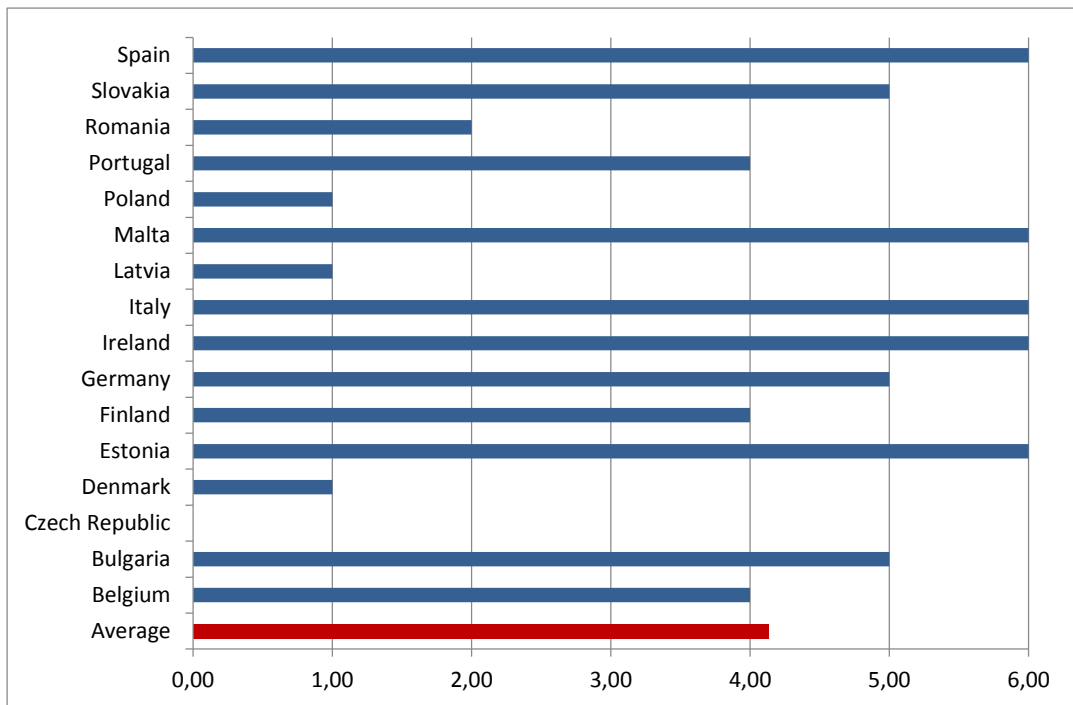
Gender equality is an ex-ante conditionality for Romania. During 2014-2020 programming period the PA and OPS's are focusing on: Promoting gender equality and balance between work and personal life, Children and young people at risk and local and regional initiatives to reduce national inequalities and to promote a social inclusion Scholarship Fund.

Some networks do not add anything in this qualitative part e.g. Bulgaria, Finland, Denmark, Belgium, Latvia, Italy, Czech Republic and Malta.

12 – DISABILITY

12.1 – Elaboration of a national disability plan or strategy

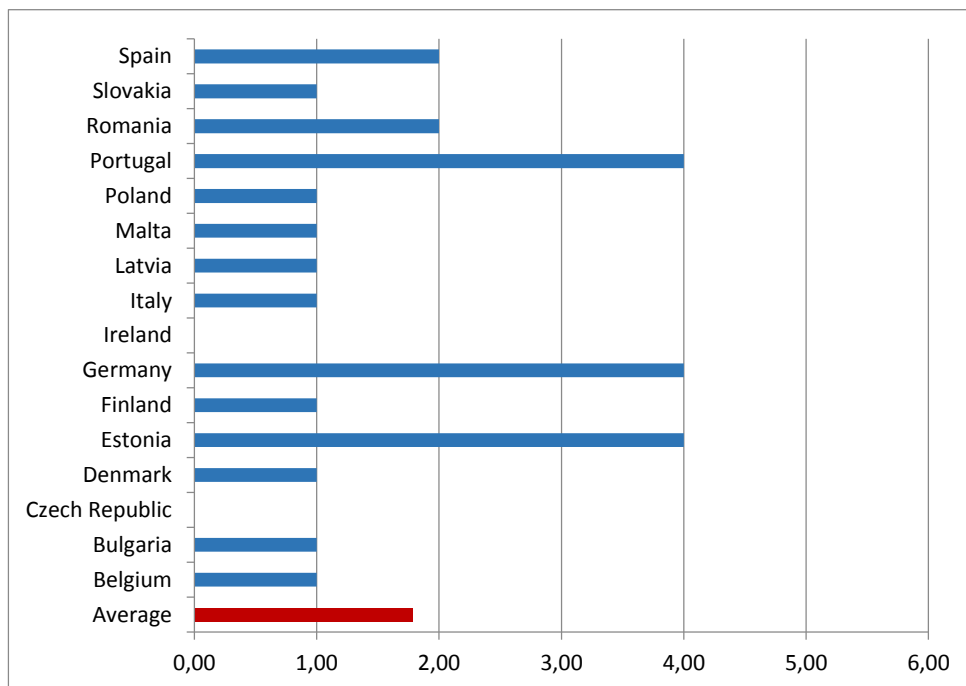
Graphic 54 – Position of the countries



In this issue there is an average of above 4 and five countries that scored with 6 (Spain, Slovakia, Poland, Italy and Estonia).

12.2 – Involvement of the NN in the drafting of the disability Act

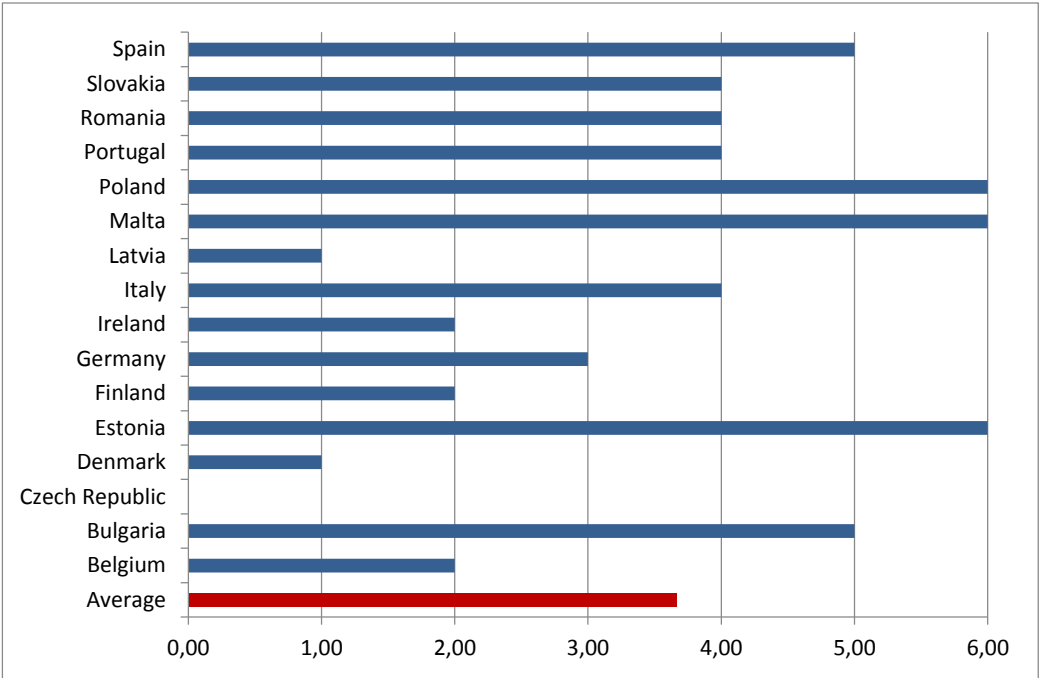
Graphic 55 – Position of the countries



When questions are asked about involvement in the strategy, the average decreases to below 2. This would imply that the organisations that complete the questionnaire are not really engaged. Both Ireland and Czech Republic didn't answer to this question.

12.3 – Evidence of a section in the PA and OP’S that focus on improvement of accessibility to services and labour market of disable people

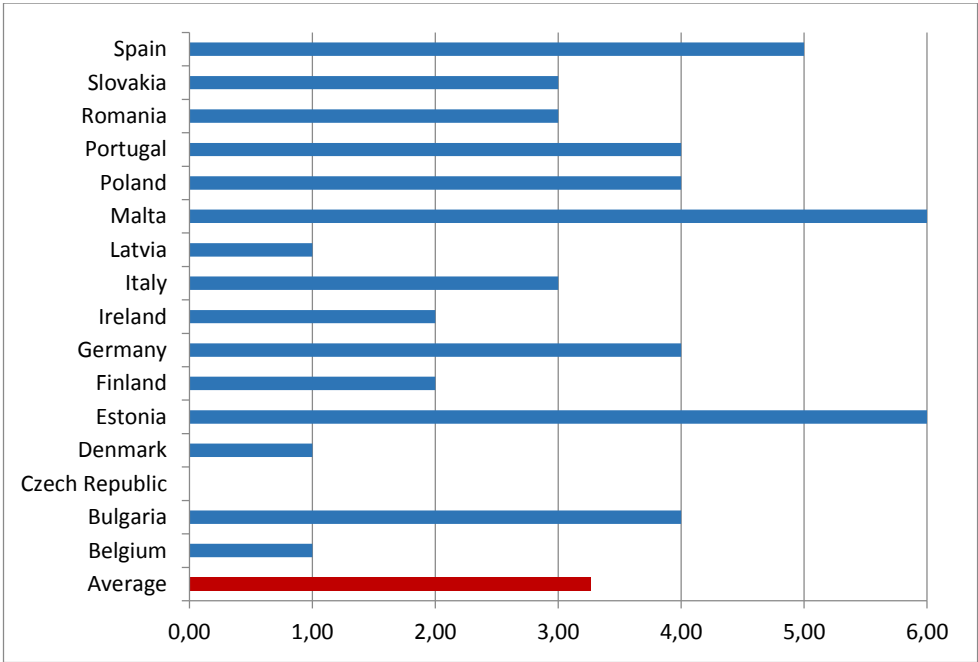
Graphic 56 – Position of the countries



In this question there is an average above 3 and some networks scored with 6 (Poland, Malta and Estonia).

12.4 – Level of satisfaction with the activities funded under this heading

Graphic 57 – Position of the countries



12.5 – Final remarks on Disability

On this issue, there are widely differing situations according to the country: In Spain, Portugal, Ireland and Italy there are specific programmes, strategies or measures to support disability organizations and people with disabilities in different areas: employment, integration in the labour market, health and access to services. In Spain, some of the disability organizations that form EAPN-ES (mainly FEAPS and

COCEMFE), took part in the drafting and implementation of the National Disability Strategy, together with the Spanish Committee of Representatives of Disabled People, CERMI.

In Germany, Denmark, Slovakia, Latvia, Romania, there are activities in different degrees but there is no explicit Disability Strategy. For instance, in Germany, people with disability can participate in each ESF subprogram within the German ESF OP but there exists no own specific program for people with a disability. In Denmark according to the network “the Danish reform for disabled, so-called pre-pension reform – has the intention of including disabled people in the labor market, but in fact it only reduces the economic support to the disabled, and adds some long-term job training of low quality, which mainly leads to more poverty and exclusion” In Latvia, “there is no support to disabled persons’ integration into society. Social enterprises do not exist in a legal form. State municipalities wish to carry out “integration” in order to grab sources available”. In Slovakia, the situation is rather difficult for people with disabilities and their families – in terms of problems of integration in the labour market; and in relation to the support given to informal caregivers in the case of people with mental health problems; also problems for those who live in institutions and cannot have a job outside, early intervention etc.

For instance, in Romania administrative capacity does not exist to support the implementation and application of the United Nations Convention on the rights of persons with disabilities (UNCRPD) in the field of ESI Funds in accordance with Council Decision 2010/48/EC. In this issue there are five networks that do not add further information: EAPN Estonia, EAPN Bulgaria, EAPN Finland, EAPN Malta, EAPN Belgium and EAPN Czech Republic.

MONITORING THE IMPLEMENTATION OF THE (AT LEAST) 20% OF THE EUROPEAN SOCIAL FUND EARMARKED FOR POVERTY

FINAL RECOMMENDATIONS

AT EUROPEAN LEVEL

Develop an effective EU Monitoring Framework

- The implementation of the Partnership principle and code of conduct should be monitored on a yearly basis during the implementation of the next programming period through the European Semester process (both through the NRPs and CSRs) and other internal mechanisms.
- The European Commission should also closely monitor and report yearly that, within each member state (MS) and Region at least 20% of the ESF for social inclusion and poverty reduction is earmarked and that the ex-ante conditionalities are adequately fulfilled and underpin the programmes and measures, particularly the anti-poverty strategy. A set of indicators should be agreed with MSs to show how the measures contribute to the Europe 2020 poverty target.¹⁷
- The focus on the monitoring should be on quality delivery and impact and should go beyond OPs and PAs to the project level. It should be based on criteria and indicators which measure short and long-term progress towards integrated social inclusion and steps out of poverty, not just getting people into any job. This should include access to sustainable and quality employment, quality services and minimum income/social protection (Active Inclusion). Measurement of support for empowerment, autonomy and participation is also key.
- Stakeholders including NGOs, and people with direct experience of poverty and social exclusion, particularly those who are current or future beneficiaries should be included as essential partners in the monitoring and evaluation process.

Promote more effective mutual learning and peer reviews

- Intentional focus is needed on sharing practices on the use of funds to deliver poverty and partnership between European Countries and inclusion of these practices in the implementation process of OPs. Peer reviews can play a key role.
- The Transnational Learning Network e.g. on Inclusion can also play its part, as well as the EU Structured Dialogue, but must ensure engagement of practitioners, and social NGO stakeholders, as well as policy makers, and see how to ensure learning from people facing poverty and exclusion.
- Guidelines must be developed to ensure mainstreaming of learning into the policy processes at EU and national level.

¹⁷ To reduce the number of people at risk of poverty and/or exclusion by at least 20 million by 2020.

Ensure bottom-up meets top-down

- Increased support and technical assistance must be given to support the Implementation of bottom-up, innovative approaches by NGOs and grassroots organisations working alongside key target groups at the project level.
- Specific support for evaluation frameworks and mechanisms is important to enable the learning from such pilot exercises to be fully captured, and then mainstreamed and rolled out.
- Global grants, particularly offering 100% or high up-front funding can offer an important means to overcome financial obstacles for this engagement.
- This must be combined with effective top-down guidance, monitoring and reporting in terms of policies and EC regulations.

Increase poverty as a priority in Multi-Annual Financial Framework

- In the next programming period it is important that the earmarking of at least 20% of ESF dedicated to fight poverty and social exclusion is kept as a central priority, if real progress is to be made on the delivery on the poverty reduction target. The focus must be on *quality* measures which support people with integrated, personalized support out of poverty and into inclusion and which really impact on poverty and social exclusion.
- The anti-poverty orientation in the ESF must be combined with an effective partnership approach as proposed in the code of conduct. Both instruments (minimum quota and quality delivery to fight poverty and using the partnership approach) are fundamental for the next funding period of the ESI-Funds 2021-2027.

AT NATIONAL LEVEL

- At least 20 % of the ESF fund is foreseen to fight poverty and social exclusion but the attitude of the ESF funding is strongly related to the integration into the labour market (in many countries). Therefore it is desirable that the perspective for a future cohesion policy is wider and focused on tackling poverty and integrated social inclusion, based on active inclusion and steps out of poverty and towards participation in society. This should be open to all target groups which are facing poverty and excluded from the labour market, like homeless people and people with drug and alcohol dependency etc. and those who need support to ensure access to services/social protection and to participate in society (e.g. families - including single parents, migrants, ethnic minorities etc.).
- Member States/Regions should use Structural Funds to implement integrated active inclusion approach, based on the 3 pillars, as essential to the delivery on the poverty reduction target. The ex ante conditionality of an integrated anti-poverty strategy based on these principles should be actively underpinning the development of the programme.
- The FEAD fund can be considered as a good addition to the current focus of the ESF, but it should clarify the links to support social inclusion with the rest of the ESF programme. For

instance in Germany they use the FEAD for the integration of EU immigrants and homeless people into society.

- Regular evaluations of the effectiveness, efficiency and impact of the funds dedicated to supporting the social inclusion priorities should be carried out. These actions should be made compulsory for the Managing Authorities by introducing them in the evaluation plan of the respective Operational Programme, which have to be adopted by the Monitoring Committees (MCs), and stakeholders should be involved in the MCs.
- Effective engagement of NGOs, including people with direct experience of poverty is crucial to effective monitoring. All Monitoring Committees should actively include these organisations, and review their methodologies and processes based on quality guidelines, drawn from the code of conduct on partnership.
- More efforts should be made to support smaller innovative grassroots projects developed in partnership with NGOs, through effective use of Technical Assistance, and priorities to partnership and global grants.
- Managing Authorities should be encouraged to develop an additional set of indicators on the expected contribution of the ESF funds to the anti-poverty target of the Europe 2020 strategy. This information needs to be included in the annual implementation reports in addition to the information required by the regulations.
- Draft annual implementation reports to be discussed in the Monitoring Committees with stakeholders and published online and should be made available for comments. The comments should be sent to the Managing Authority and to the European Commission with the reports.

AT LOCAL LEVEL

- Criteria for the selection of operations and project evaluation methodology relevant to social inclusion projects have to be developed with the participation of social NGOs and representatives of the so-called “target groups” (final beneficiaries) – these organisations and people living in poverty and social exclusion know better what kind of projects will help them become better-off.
- NGO representatives (and people living in poverty and social exclusion themselves) need to take part in the evaluation committees (for calls for proposals relevant to social inclusion priorities) as well as in the other tasks of Monitoring Committees, at all phases of the planning, monitoring and implementation process.
- Technical assistance should be used in order to support the participation of social NGOs in the decision-making and implementation processes i.e. development of innovative projects.
- Global grants and arrangements for up-front financing are crucial to enable small organisations to deliver on their potential.

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The European Anti-Poverty Network (EAPN) is an independent network of non-governmental 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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