



European Federation for Street Children

**Comments on the
Communication from the Commission to the Council, the European Parliament, the European
Economic and Social Committee and the Committee of the Regions**

**“An EU Strategy for Youth – Investing and Empowering
A renewed open method of coordination to address youth challenges and opportunities”**

The European Federation for Street Children welcomes the Communication as an important outcome of the reflection process launched by the Commission as a follow-up to the Social Agenda, as well as of the attempt to carry out the consultation in a participatory way. EFSC broadly agrees with the priority areas set out in the communication and on the cross-sector approach that it adopts. Overall, the Communication sets ambitious goals and priorities, while not always providing the necessary details on the measures to ensure that the implementation of the Communication reaches the most excluded youth. EFSC contribution will for this reason mainly concentrate on the social inclusion field of action of the Strategy.

EFSC considers a EU policy on Youth a very important step towards addressing pressing education, health and employment needs of the present and future generations. However, EFSC regrets to see that the target group of the Communication, in spite of some mentioning of “unorganised youth”, remains mainstream youth from EU member states; EFSC would like to remind the Commission that among the greatest challenges which the EU faces in the field of social inclusion remain the young unaccompanied minors. Mostly aged 15-18, these young people are typically not registered in the public administrations, and are thus denied minimum income levels as well as access to basic services, which clearly seriously hampers their opportunities to play an active part in society and puts them at a high risk of becoming youth offenders. Even more urgent actions are required by the group of street children and youth who are only partly identical with unaccompanied minors. Following the definition of the Council of Europe, street children are people “under 18 who, for shorter or longer periods, live in a street milieu. They are children who live wandering from place to place and who have their peer groups and contacts in the street. Officially these children may have as their address their parents’ homes or institution of social welfare. Most significantly they have very few or no contacts with those adults, parents, school, child welfare institutions, social services, with a duty towards them”. In comparison with most of the other excluded groups among young people, there is a total lack of access to any social services in the field of social, health and education which goes together with non-registration on an administrative level enabling thus the exploitation through criminal organizations.

The phenomenon of street children has been acquiring an increasing European dimension for several years, as a side effect of the EU Enlargement and the creation of a space of free movement, which led to an increased migration of high-risk youngsters on their own from Eastern Europe to Western metropolis. This tendency is further strengthened by the effects of globalisation on economic and social systems. In the same time the EU migration policy seems to favour the fight against illegal migration over the protection of children’s rights. In addition, the present context of economic recession is likely to

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disproportionately affect these children. A strong EU-wide effort of policy and society is required, where NGOs should act as interfaces between EU social policy design, national legislation, and local implementation. This group is not at all considered by specific support measures at the national and European level neither by the OMC for which it would constitute a high priority group for social inclusion: The NAPs 2006-2008 and 2008-10 still insufficiently target street children as a priority group, and the political will in addressing the issue of street children in the EU and in consulting the civil society involved in their protection is still limited, although signs for an improvement for the next round have been indicated in some countries.

On the fields of action of the Communication

EFSC strongly support the Communication statement that poverty and social exclusion among youth should be prevented by “mobilising all actors involved in the life of youth”. However, the very general provisions of the social inclusion field of action may not significantly contribute to initiate a momentum of change as they address different dimensions of social exclusion in an untargeted way.

EFSC welcomes the connection which the Communication sets out with the upcoming EU strategy on the rights of the child and looks forward for this communication to boost the Commission’s efforts towards adopting and implementing an EU strategy on the rights of the child directly after the new Commission will be established. Considering the relatively longer process leading to the establishment of the EU strategy on the rights of the child, EFSC calls on the responsible officials both at national and EU level to make sure that the two processes are as far as possible interlinked and that the synergies among the two dimensions are capitalised on. The cross-sector approach should be shared among the two strategies and both should constitute an occasion to boost the internal dialogue at the European Commission on issues of relevance not only to the social inclusion of children and youth but wider to their rights and opportunities. EFSC sees improving the internal dialogue at the European Commission as a crucial dimension of the mainstreaming of children and youth in EU policies.

A clear and sustainable commitment to support organisations working with excluded youth and youth offenders is all the more needed in the present context of economic downturn, which is reducing the resources available to EFSC member organisations and other social NGOs committed to the protection of street children to the point that some organisations are struggling to survive. An EU commitment towards social inclusion of children and youth and the earmarking of funds for this purpose with a clear accountability structure is necessary to ensure that economic crisis does not subtract resources to social NGOs at national level.

EFSC also supports the statement that one of the actions of Member States and the Commission should be to “optimise the use of EU funds and experimental programmes to support social integration of young people”. Locally-active organisations working with the most excluded children and youth are often not aware about the funding opportunities available at EU level and a fundamental joint effort from the European Commission and Member States, including through their local authorities, is required to make these funding sources known to those who need them most. The allocation of these resources should, as EFSC has stressed in many different occasions, be de-linked from the political relationships of NGOs with their respective local, regional and national authorities. In the same time they must be shaped in much easier, understandable and user-oriented way using self-learning tools and oriented in a field applicable way. Furthermore, the complementary use of Brussels-centralized assistance programmes and the structural funds for projects, especially in a cross border context, must be considerably improved. An EU strategy for Youth means also ensuring a sustainable support to NGOs and too many EFSC member organisations are suffering under funding shortages due to changing

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political will.

Addressing the different dimensions of youth homelessness is fundamental for achieving social inclusion, in particular regarding unaccompanied minors and to prevent young people to enter in conflict with the law. However, EFSC would recommend that the European Commission puts more emphasis on the analysis of the causes of homelessness as well as on the preventive measures and linkages among the different dimensions of education, employment and health access, social status and homelessness.

In this respect, EFSC very much welcomes the Communications' focus on non-formal education in the Education field of action: EFSC member organisations have proven the importance of non-formal education both in the prevention and in the reintegration of street children and youth. EFSC calls on the European Commission to push Member States to fully recognise and resource this form of education as an integral part of the national educational systems.

On the suggested measures to deliver the vision in a new integrated cooperation framework

EFSC regrets that issues relating to the social inclusion of young people with fewer opportunities, excluded youth (including children) living in poverty are not addressed as such neither in the section on dialogue with youth, nor in the peer review section of the Communication.

Regarding the review of the structured dialogue, it is clear that the participation of excluded young people poses specific challenges which need to be addressed with targeted measures and not generally as "unorganised" young people. EFSC urges the European Commission and the Council to take this into account when carrying out the review of the structured dialogue as an unavoidable condition for this dialogue to be inclusive and meaningful. The effort to include the most excluded people in the structured dialogue should be a constant one, unrelated to the specific thematic cycles.

With reference to the coordinating role that the EU Strategy on Youth should play within the European Commission, which EFSC is pleased to recognise in the text of the Communication itself, EFSC would support that the theme of the structured dialogue cycle to start in 2010 would be "Combating Youth Poverty and Social Exclusion". This should contribute to maximise the synergies with the European Commission's and Member States' activities planned for the European Year 2010, and in order to learn about young people's most pressing concerns and proposals regarding the global economic downturn. Similarly, in view of the 2011 European Year of Volunteering, the structured dialogue could focus on "Youth and Volunteering". In all cases the structured dialogue should be focused on revising existing policies and to deliver concrete suggestions to be incorporated in the policies.

By the same token, we suggest connecting the Peer Learning "high-level seminars" and "clusters" to the theme at stake in the European Commission so that the synergies and awareness-raising momentum of initiatives such as the European Year 2010 can be fully capitalised on. From this point of view we suggest changing the topic of the 2010 seminar in view of collecting lessons on successful young people's initiatives to face the global economic crisis, while we support the selection of the topics for 2011. EFSC perceives that concretely gathering cross-sector stakeholders working on a specific issue may lead to more tangible results than discussing the cross-sector approach *per se* in a specific seminar. In EFSC's view, the ways to carry out the cross-sector approach have to adapt to the specific topic at stake and should be horizontally dealt with in all peer review seminars.

Regarding the implementation in Member States, the provision should be more detailed as to the forms and mechanisms of the involvement of Member States' authorities and go beyond the involvement of

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Youth Directors-General to achieve a true cross-sector approach. This applies even more as the accountability for children and youth is rather differentiated in the different Member States' administrations.

EFSC supports the Communication call for evidence-based policy-making and sees it as an opportunity to boost data collection in the field of extreme social exclusion, especially of children and youth, based on and going beyond the recommendations of the 2007 Report on Child Poverty and Well Being in the EU, on which we would support an EU-wide study to be launched in 2010.

EFSC, whose work is necessarily articulated on a cross-sector approach, is keen to support the European Institutions in the coordination among different DGs and topics, as well as in the collection of best practices.

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