



**European Federation for Street Children
Comments on the Strategic Framework Document
“Priorities and guidelines for the Implementation of the 2010
European Year’s activities”**

While regretting not being able to provide comments with a higher degree of thoroughness due to a very short consultation timing, which has not directly included all interested EU-level networks (such as some PROGRESS-funded networks, which are on the other hand required to include preparatory actions for the EYAP in their work programme 2009), EFSC shares and very much welcomes the selected objectives of the Year, particularly Objective 1, “Recognition of rights”, and the Commitment to concrete action under objective 4. The focus under objective 2 to “provide opportunities for forms of participatory assessment of EU and national social policies” is in line with EFSC’s willingness to give a stronger voice and boosting participation of the most marginalised children of our societies and street children in particular. The focus under the “Cohesion” Objective 3 on providing “opportunities to organisations and sectors not usually engaged in poverty” is also coherent with EFSC’s long-lasting commitment to leveraging the responsibilities and resources of the business sector through corporate social responsibility in favour of the most marginalised children of our societies.

EFSC also very much appreciates the Commission’s focus on accessibility of the actions, which shows that the shortcomings of previous Years have been adequately taken into consideration and that hopefully the European Year for Combating Poverty and Social Exclusion will have a stronger impact on people experiencing poverty, especially the growing number of children in most of the Member States suffering under poverty, and the organisations working on a daily basis to support them. Furthermore, EFSC is pleased to see that the policy area of fighting child poverty is included as one of the priorities of the Year and hopes that NIBs will be adequately sensitised on the issue in order to make sure that their National Programmes concretely address this priority area. This regards particularly the close co-operation with relevant NGOs carrying out effective inclusion in the field, notably for street children.

On the issue of partnership with civil society and stakeholders, EFSC welcomes the fact that participation of the relevant stakeholders is prioritised and is keen to provide advice and contacts to the NIBs for the elaboration and monitoring of national programmes. Still, EFSC calls on both Member States and the Commission to make sure that this commitment is actually implemented by allocating sufficient time to the consultation and opening pathways for organisations to actually contribute. EFSC welcomes the Commission’s willingness to make sure that NIBs support also small and medium-sized

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organisations working for the support of the most disadvantaged. Nevertheless, the foreseen timing from the appointment of the NIBs to the submission of the NPs (from February to end of March 2009) is certainly too short to ensure an adequate involvement of the stakeholders in the shaping of the NPs which have not been previously involved in policy-making. In particular, small-sized and predominantly field-oriented organisations operative on a local level whose action is often crucial for a sustainable re-insertion of disadvantaged groups, notably of street children, might lack the resources for a timely involvement in the consultation process. They therefore run the risk of not being involved in the shaping of the NPs at all. Once the NPs are shaped, they may find it difficult to have their proposals selected for funding under the Year. This may be the case for some of EFSC member organisations which actively contribute to fight poverty and exclusion on a daily basis. In order to avoid that their precious contribution is lost, EFSC calls on the Commission to adequately sensitise the NIBs on the issues put forward by EU-level networks and to timely inform EU-level networks about the appointment of the NIBs in order to allow wider platforms to support national-level efforts. At the same time the Commission should appeal to the NIBs to provide those NGOs with concrete user-oriented guidelines, toolkits and handouts that facilitate their engagement on a methodological and operational level.

Regarding the role of EU-level networks in the Year, EFSC feels that more clarity is required on the ways for EU-level networks to get involved, and in particular calls on the Commission to clarify the following points:

- Do PROGRESS-funded networks have to expect “moral support” of the Year to their PROGRESS activities in 2010 or can they expect that specific activities be funded under the Year?
- Is there a possibility to complement nationally-funded activities with EU-funded activities (as in EFSC concept of a EU-wide documentary on street children in preparation of a media awareness rising campaign during the European Year, to be co-ordinated at EU level and collecting cases from the national levels)?
- How will the available amount of funding be allocated between the communication campaign and EU-level subsidies?

EFSC welcomes the strong media focus of the Year but calls on the Commission to ensure that the communication campaign does not focus mainly on pan-European issues investing large financial amounts in subcontracting private communication agencies. The main impact of the media campaign should be on the national and regional levels reaching more effectively than in previous European Years the media, the political decision makers, small and medium-sized NGOs and last but not least those people who are concretely experiencing poverty. This will be crucial for achieving effectively the goals of the European Year 2010 and to ensure that it will have a concrete inclusion impact on the socially excluded citizens in our society among which street children are certainly one of the most vulnerable groups.

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