



EFSC's 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

“Modernising Social Protection for greater social justice and economic cohesion: taking forward the active inclusion of people furthest from the labour market”

The European Foundation for Street Children (EFSC) is pleased to see that, as a result of the consultation process, the European Commission perceives the involvement all relevant actors as a “need” (6.2, §1) and asks the civil society partners to comment on the Communication’s content, and on the effectiveness and comprehensiveness of its proposals to promote active inclusion. EFSC agrees on the fact that the success of active inclusion policies depends upon the involvement and cooperation of several actors, and is therefore keen to contribute to this consultation with its specific focus on street children’s rights.

Overall, EFSC agrees with the active inclusion approach endorsed by the European Commission and welcomes the recognition that social inclusion requires a holistic approach involving income support, an inclusive labour market and access to quality social services.

Concerning the Active Inclusion approach

Although welcoming the holistic approach and the three strands of the active inclusion strategy, EFSC regrets to see that **the plight of child poverty seems not to be considered by the European Commission as a priority of the Active Inclusion policies; at least children in poverty as well as other marginalized groups are not specifically mentioned when the papers refers to “those at the margins of the labour market”**. It would be important to make such visionary policy design more concrete in order to pave the way for more specific target group-oriented solutions. Indeed, child poverty is not mentioned at all throughout the Communication, in spite of its prioritisation under the Open Method of Coordination on Social Protection and Social Inclusion.

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Although active inclusion and child poverty are expressed as two different priorities of the Social Inclusion Strategies for Member States 2008-2011, active inclusion strategies and measures to tackle child poverty should not be considered as isolated from each other. On the contrary, it is imperative that children and, particularly, strongly excluded children be much more taken into consideration in social inclusion policies than was the case in the past: namely, the issue of street children has been completely disregarded in the 2004-2006 National Action Plans for social inclusion.

Active inclusion strategies, if properly formulated, may have a very strong impact on child poverty:

- First, child poverty is closely related to household poverty; the extent to which active inclusion affects not just the individuals at the margin of the labour market but also their family environment, should be made clear within the strategies;
- Second, poor children are very likely to become socially excluded adults: preventive measures to tackle this plight will increase the long-term effectiveness of the active inclusion strategies;
- Third, children are, according to the UN Convention on the Rights of the Child, all individuals under 18 years of age. This means that the exclusion from vocational training opportunities directly affects some categories of children; the specific needs of poor adolescents and the measures to tackle them should be clarified within the strategies.

As a result, **EFSC urges the Commission to explicitly address child poverty as an integral part of the Active Inclusion approach and to include it in its Recommendation**, so that Member States are more strongly pushed to take the child poverty dimension into account when drafting the national strategies. This comprehensive approach to Active inclusion is particularly important in order to avoid the risk of creating incoherence between measures to promote active inclusion and strategies to tackle child poverty.

Concerning the common principles for the three strands of the Active Inclusion strategy

Explicitly addressing the issue of street children in the Recommendation that the European Commission will draft is going to directly contribute to the effectiveness of the social inclusion strategy when implemented, in terms of concretely reaching those social groups who are left at the margins of the labour market. The problems of street children and other extremely marginalized groups of children are too often overlooked and underestimated at the decision making level, partly due to the difficulties faced in the collection of reliable data and partly to the lack of political will at the local, regional and national level.

Recognising the urgency of the street children issue in Europe has a strong political significance and is at the same time setting the basis for the elaboration of strategies and the allocation of an adequate budget to implement them.

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Therefore, EFSC calls on the Commission to make explicit what the impact of the implementation of the common principles in each of the three strands would be on children and in particular on street children and other strongly marginalized groups of children.

Minimum income schemes

EFSC welcomes the Commission's rights-based approach to minimum income schemes as well as the principle of implementing the right of a person to "sufficient resources and social assistance to live in a manner compatible with human dignity" according to practical guidelines. Minimum income schemes are likely to indirectly benefit children by improving the income situation of their families.

Nevertheless, EFSC recommends that, when defining the practical guidelines, the Commission take into consideration not only the individual dimension but also the **distribution of income within a household, and more generally the impact of a variation of income on the whole household.**

Further, it should not be overlooked that **minimum income schemes may fail to reach some categories of extremely marginalised children, particularly street living children, who do not count on a family and therefore are not entitled to any benefit under this strand.** In other words, their right to resources sufficient to live in a manner compatible with human dignity is not fulfilled.

Inclusive labour market

EFSC welcomes the call for active and preventive labour market measures (4.2, §1) aiming at improving the link to the labour market and including early identification of needs, job search assistance, guidance and training. Also this strand is likely to contribute indirectly to the well-being of children by improving the employability of the members of their families.

Still, EFSC calls on the Commission to specify in its common principles that "early identification of needs" implies not only identifying the needs of the direct beneficiary of the support measure, but also of its family and children in particular.

Most street children and extremely marginalized children are involved in forms of child labour, which in some cases – e.g., when it is linked to illicit activities, abuses and exploitation - becomes the main reason for their social exclusion and prevents them from acquiring a job in the formal labour market or the necessary education and training to achieve this at a later stage. **Specific measures should be identified for the sake of the re-inclusion in the labour market of young people with very low levels of education and training, for example through informal education.** A very important role here is played by non-for-profit organisations working on a daily basis with marginalized children and youth, and their expertise and best practices should be capitalised on. At the same time, providing children of an appropriate age with training is likely to contribute to improving their qualifications and reducing their vulnerability to exploitation and

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violence. EFSC calls on the Commission to take this issue into consideration and to include it explicitly in its Recommendations.

Access to quality services

Access to quality services is a crucial means to serve the social inclusion of any marginalized group and EFSC very much welcomes the principles of accessibility - implying both availability and affordability-, and quality. Indeed, street children in general are totally out of the reach of social services and improving their accessibility is a step towards directly contributing to their capacity to benefit from social services.

Particularly relevant to tackling the plight of street children is the element of coordination and integration of services: given the complexity of the street children issue, a coordinated answer by, for example, unemployment services, drug addiction services and health care services is likely to have a stronger impact on marginalization than the isolated response of one institution.

EFSC calls on the Commission to specify that, for the sake of active inclusion, those services should not only target adults but also children, as a preventive measure against social marginalisation.

Concerning the supporting EU framework

EFSC supports all initiatives envisaged by the Commission in order to support the implementation of the common principles.

The systematic monitoring and evaluation exercise and the new European Social Fund regulation to support active inclusion are both powerful means to ensure the effectiveness of the implementation of principles and can be very useful to support the active inclusion of extremely marginalized groups of children, provided that they specifically foresee active inclusion of children as a priority.

Similarly, the EFSC supports the call for full involvement and commitment of national and regional actors as well as the establishment of a Network of Local Observatories for monitoring and promoting best practices. Given the particular importance of best practices in the field of active inclusion of children, the Network can strongly contribute to improving the available knowledge and effectiveness of social inclusion strategies, as well as to raising awareness on the importance that addressing strongly excluded children's issues has in the light of the wider social cohesion. EFSC is keen to contribute to the Network with its own expertise and knowledge pool gained through its work in the field for the social inclusion of street children.

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Concluding remarks

Overall, the EFSC supports the holistic approach endorsed by the Commission and its renewed efforts towards active inclusion.

As for the comprehensiveness of the Commission's proposals to promote active inclusion, the current approach seems to be incomplete as it overlooks the specific issue of extremely marginalised groups of children and street children in particular. **EFSC calls on the Commission to include addressing the needs of extremely marginalised children as an integral part of the Active Inclusion strategy**, both from a rights-based perspective and from the point of view of socio-economic convenience in the light of the Lisbon strategy.

On the other hand, investing on children's active inclusion is crucial to the long-term effectiveness of any proposed active inclusion strategy. **Therefore, the EFSC recommends that children's rights are mainstreamed in the common principles guiding Active Inclusion strategies and included in the forthcoming Commission's Recommendation.**

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