



Policy Paper

May 2013

The Social Investment Package

EASPD Policy Paper

GENERAL COMMENT ON THE FRAMEWORK

EASPD welcomes the Social Investment Package (SIP) for its positive re-orientation towards social policy as a social investment that yields important economic and social returns over time. This is a positive step forwards with respect to the previously held view of social welfare expenditure as a pure cost. We also support the life-cycle approach to social investment and the recognition of the vital role that social provision plays at key points in the lives of individuals by helping them to confront life's risks and cope with key transition points.

However, EASPD would have liked the Social Investment Package to be more ambitious, specifically to be binding for Member States so as to ensure the delivery of the proposed actions, while the main instruments of implementation will be the European Semester, the Open Method of Coordination, the Social Protection Committee, i.e. tools mainly based on peer reviews and exchange of information, processes that may lack effectiveness and that don't always involve civil society in an adequate way.

The availability and use of structural and innovation funds to support Member States in the implementation of the Package is positive, but **the objective** of the strategy **will not be reached unless there is a clear change of direction** in terms of austerity measures and spending cuts in social welfare which are currently the norm in most European countries. A forward looking social investment strategy goes hand in hand with **positive economic policies to promote investment, innovation and knowledge** in order to create **quality employment** and greater social welfare, a holistic vision that is currently missing on the EU policy landscape.

EASPD is aware that the European Commission is counting on a broad **partnership** for implementation, and **offers its full support to guarantee a full implementation** of the Social Investment Package. The main **areas** in which EASPD and its members can make a contribution to are the following:

- social innovation in the social services sector;
- the promotion of quality employment in social services;
- the establishment of a viable social dialogue structure in the sector at European level;
- use of innovation and structural funds to make the implementation of the SIP possible;
- the organisation of social services at national level, through **clear and stable legal frameworks** (cf. impact of Internal Market rules on social services of general interest)
- the achievement of the Europe 2020 at national level and specifically of the poverty target.

Page

EASPD, as an umbrella network of service providers for persons with disabilities is in an **ideal position to support the Commission** in its implementation efforts, and more specifically by providing help in **identifying** the **needs** of the people we work with, so that the proposed Social Protection Guides and the proposed Directive can be designed in such a way as to ensure they meet the needs of vulnerable people and the services that support them.

The Communication mentions that "Social Innovation is an essential element of social investment policy since social policies require constant adaptation to new challenges. This means developing and implementing new [...] services and models, testing them and favouring the most efficient and effective."

Social Services are at the forefront of innovation in the sector as they constantly innovate their service offers to ensure that they respond to evolving users' needs in the most adequate manner. As such, EASPD and its members are ideal partners for the Commission as we can provide advice and share information on best practices, know-how, implementation, dissemination and scaling up of innovation in social services. EASPD and its Members are also available as delivery partners and support the Commission's proposal to use structural funds in addition to the Programme for Social Change and Innovation to support progress in these areas. EASPD further suggests the earmarking of funds within the upcoming Horizon 2020 Programme to finance further research on social innovation in social services and social policy.

The Communication also mentions the need to address "the widespread shortage of a health and long-term care workforce". EASPD **regrets** the fact that **no reference** is made to the similar **shortage of staff in the social care sector** and reminds that social services have had a high net employment creation record over the last decade; even despite the crisis and growing overall unemployment rates in the EU. Social services have thus demonstrated that they have a **great growth potential**, which is only set to increase given the crisis (insofar as there is a growing number of people in need of services) the demographic changes in Europe and also the ageing of the workforce in the sector, which means that there is a great, yet unexplored, potential to create stable and fulfilling employment within social services in Europe.

EASPD calls the Commission to develop a **holistic strategy** to achieve this objective and offers its full support for the creation and implementation of such a strategy. As described in a paper on Employment in the Care Sector published in 2010, there are a number of strategies that can be put in place to make the most of the sector's employment creation potential and improve working conditions.

This strategy could:

- Encompass an **expanded range of recruitment**, to attract new groups of people to the sector, such as male workers, young people and recent graduates;
- Raise the **profile of careers** and the **professional status** of the social care sector in Europe;
- Support the creation of vocational training courses and qualifications for careers in social services. The European Qualification Framework could also play a key role in ensuring that there are common references and teaching standards across the various EU Member States;
- Ensure better coordination between educational and employment policies to make sure that students are prepared for the professions that will be available once they are ready to enter the job market.

COMMENTS ON THE STAFF WORKING DOCUMENTS.

Coming to the specific Staff Working Documents (SWD) EASPD decided to **comment** on the ones with the greatest impact on our sector and namely: the SWD on the implementation of the 2008 **Active Inclusion** Recommendation, the SWD on **Long Term Care**, the SWD on the use of **structural funds** and the Third **Biennial Report** on SSGIs.

For what concerns the **SWD on Active Inclusion**, we strongly **support** this initiative, which highlights the **need for a full implementation** of the Recommendation, far from currently being achieved by most member states. This might make a difference in the achievement of the EU2020 Strategy targets and would also help to build a more social and inclusive Europe.

In particular, we welcome:

- The references to the need for adequate **income support**, which is one of the main problems for staff employed in our sector and partly explains its staff shortages;
- The reference to the need to build an inclusive labour market, and we would like to stress that supported employment services for persons with disabilities can play a crucial role in achieving this;
- The need for guaranteeing affordable, accessible and adaptable services, completely in line with EASPD's philosophy;
- The one-stop-shop principle.

Nevertheless, we are partly **concerned** about the **back-to-work approach**. The suggested policies are targeting **more towards the individuals than the working environment**. We would have welcomed, for instance, references to the employers' obligation to provide reasonable accommodation, based on the CRPD.

We would have also liked to find the following points on the SWD that are currently missing:

- The reference on **how to integrate people who cannot work**. Not everyone is able to work, but everyone should be included in society;
- The policy part. The paper is more a research on what has been done in member states to implement the recommendation, but lacks reflection on how to create quality jobs in the current context.

For what concerns the SWD on Long Term Care (LTC), EASPD welcomes:

- The community-based approach and the promotion of independent living;
- The recognition of the **role of NGOs** and of informal care in the field of LTC;
- The will to address the sector's black market problem.

It is **disappointing**, though, that the definition of LTC only refers to care for elderly persons and **excludes** support services for **persons with disabilities**.

The SWD **Social investment through the European Social Fund** (ESF) analyses the role of the ESF in supporting the implementation of the Social Investment Package.

It includes many **positive points** in our view, such as:

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- references to **Ex-ante conditionalities**,
- The fact that it will be easier providing combined support from several funds,
- The reference Partnership Principle,
- The institution of a Code of Conduct.
- The commitment for better monitoring,
- support to the capacity building of NGOs,
- The will to strengthen the EU Semester,
- The reference to the fact that structural funds are a means for the EU to support MS in the implementation of the SIP, but that the budget should be mainly allocated at national level.

EASPD, however, is concerned that:

- The SWD at page 3 states that the future programming of the European Structural and Investment
 (ESI) Funds, including the ESF, will be more strategic and geared towards results. It is not
 explained though what strategic/due towards results really means;
- The Semester will be strengthened and the Country Specific Recommendations will have a central
 role. They are instruments where the Council plays an important role in the negotiations. It will be
 difficult to give priority to social inclusion and poverty reduction targets;
- There is **lack of coherence** between the **EU semester**, which is a one-year process and the **Multiannual Financial Framework**, a 7-year one.

Moreover, the SWD could have specified which tools will be used for the partnership principle.

Finally, EASPD believes that the **Biennial Report** on SSGIs is a very **useful explanation** on the new legal framework for SSGIs; including public procurement and state aid. The results of the Forum on SSGIs have been included and the comments of service providers have been taken into account. Although EASPD certainly welcomes this, the **report part is missing**, with data and analysis on the role of social services of general interest. This would have been particularly welcome in a moment where service providers have proven their resilience to the crisis and their contribution to social inclusion.