

Position paper on the Policy Roadmap for the 2013-2014 Implementation of the SIP

EASPD is the European Association of Service Providers for Persons with Disabilities. We are a European not-for-profit organisation and represent over 10,000 social service provider organisations across Europe and disability. The main objective of EASPD is to promote equal opportunities for people with disabilities through effective and high-quality service systems.

EASPD is registered at the Transparency Register under the following number: 120906010805-50

Here is our position paper on the 'Policy Roadmap for the 2013-2014 Implementation of the SIP, commenting on our perspective on each deliverable, as well as the overall policy roadmap.

Given the important role played by EASPD in terms of representation of employment services for persons with disabilities, we are available to further support the implementation of the roadmap.

Key Points

General Overview

EASPD

- Supports the general Social Investment Package Roadmap
- Regrets that persons with disability, nor social services, are considered as a target group
- calls to be involved in the implementation of SIP –in partnership with the European Commission- to maximise impact
- Wishes that there would have been a section in the roadmap allowing to measure the success of each deliverable, perhaps in an additional outcome box.

Action 1

EASPD:

- Calls for EASPD to be further involved in certain deliverables where we could bring significant added value to the proceedings, in areas such as the

- Methodology on the efficiency, effectiveness and the investment dimension of Member States' (MS) budget for social policies,
- Knowledge bank,
- Network of social policy experts,
- European Platform on Investing in Children
- Regrets that long-term care only refers to care for elderly persons, excluding persons with disability who may also need long term care,
- Calls for person with disability to be considered as one of the six “portraits of individuals with no or limited labour market attachment”

Action 2

EASPD

- Generally supports the actions showing how to best use EU funds to support social investment:
 - Strongly welcomes the EaSI programme.
 - Welcomes that Commission proposes policy guidance for use of ESF funds. EASPD proposes that these funds may be used to organise trainings with national and regional authorities on how to best use structural funds to implement the reformed ESF for 2014-2020
 - Regrets that persons with disabilities are not been considered as a target group in Horizon 2020,
- Agrees with the need to improve the cost-effectiveness of social protection systems but not to the detriment of social protection systems that give adequate, tailored and quality support to citizens.
- Calls for the proposal on conditional cash transfers to be assessed in light of their potential effect on low-income households, in particular for those having children with disabilities.
- Calls for the study on effective policies to reduce homelessness and housing exclusion to take all aspects of de-institutionalisation into account.
- Welcomes the concrete support the Commission will give to MS with regard to support to actors engaged in social experimentation. EASPD, however, believes that MS should also be supported and given guidance on how to upscale existing innovative models.

Action 3

EASPD

- Supports the actions aiming to better monitor the outcomes of Social policies and measures, including the:
 - Social Protection Performance Monitor
 - European Statistical System
- Hopes that these actions also take into account the impact of policies on persons with disabilities and the support they get from social services.
- Regrets the fact that although these measures are key to understanding what is happening, they lack reflection on how to create quality jobs in the future.

- Strongly regrets the lack of emphasis on disability, insofar as new research on the matter would intrinsically lead to a better implementation of the UN Convention on the Rights of Persons with Disability
- Calls for the adaptation of the WHO global guide on age-friendly cities to the EU context to also take into account persons with disabilities and thus create “cities for all”.

Explanation of key points

General Commentary of the Roadmap

EASPD welcomes the Policy Roadmap for the 2013-2014 Implementation of the Social Investment Package. In particular, we support the actions mentioned in the Roadmap which consider social policy to be seen as a social investment bringing back significant economic and social returns over time. We consider this to be a fundamental and positive re-orientation in the way that the EU and its Member States consider European social policy. Yet EASPD regrets the lack of ambition in terms of binding Member States to actions so as to ensure the delivery of the proposed deliverables. Indeed, the proposed actions mainly based on peer review and the exchange of information may lack effectiveness and –based on experience- these actions often lead to a lack of involvement of civil society in their implementation.

We also regret that persons with disability are not included in the target group of the SIP and are as As disability is a cross-cutting issue and not considered as a target group, there is a strong risk that people with disabilities will be excluded from the actions stated in this roadmap. The same could be said about social services.

To ensure that this does not happen, we hope to be involved by the European Commission in the implementation of each of the relevant actions which concern our sector. EASPD understands that only be a close working partnership between the European Commission and social service providers such as ourselves can the impact of the SIP be maximised at national level. As a representative organisation of over 10,000 service providers for persons with disabilities in Europe, we believe we have sufficient expertise to offer the Commission across many of the topics included in this roadmap.

1. Strengthening the social investment approach through the European Semester

EASPD views the fact that the actions in this roadmap are placed within the framework of the European Semester as a very positive sign. We welcome the fact that Social Investment roadmap is linked to important objectives included in the Annual Growth Survey for 2014, in particular the implementation by Member States of the Active Inclusion priorities and the one-stop-shop for access to services. We are also supportive of the priority to preserve access to adequate social protection benefits, services, health and long-term care. Yet, we believe the term adequate to be rather vague and would welcome the following more focused terming in the future: “affordable, accessible and adaptable services”.

Response to deliverables

EASPD fully supports the proposal by the Commission to create a methodology on the efficiency, effectiveness and the investment dimension of MS' budgets for social policies and would like to be involved in its drafting. We believe we can bring significant added value to these proceedings as many of our members are the first to suffer or prosper on MS social policies, especially those linked to social services or disability. Similarly, we would also like to be involved in the knowledge bank and join the network of social policy experts.

Whilst EASPD welcomes the actions on long-term care (LTC), we regret that the definition of LTC only refers to care for elderly persons; thus excluding support services for persons with disabilities who also require the need to receive LTC.

EASPD fully welcomes the action to develop knowledge on active inclusion strategies at national level and in particular the objective to draft a report analysing "portraits of individuals with no or limited labour market attachment". We call on the Commission and on the World Bank (as co-partner in this project) to include a person with disabilities as one of the six individuals involved in this research. Indeed, many persons with disabilities often have no or limited labour market attachment, either by lack of support or by the severity of the disability. As around 1 in 6 people in Europe have a disability, yet in 2002 only 38% of the disabled aged 16-34 across Europe had an earned income, compared to 64% of non-disabled people. Based on our experience the figures today remain the same if not worst than in 2002. This remains a significant problem for the EU and must be tackled. We believe that an analysis of a person with disability in this research project would bring significant added value to the research as a whole. Additionally, we believe that it is of utmost importance that the European Commission issues an up-to-date study on the unemployment rates of persons with disability in Europe.

Around one third of our membership is providing job-related services or employment to people with disabilities thus these topics are high on the agenda of service providers in Europe. While EASPD recognises that employment on the open labour market is the best option, it also acknowledges that many people with disabilities are in other labour schemes for reasons of culture, history, policy or degree of disability. As such, if it were to be decided that a person with a disability would be one of the individual's considered in this study, then we believe that we should also be involved as service providers are often the link between the employment market and persons with disability.

EASPD fully welcomes the fact that the European Commission launched in February 2013 the European Platform on Investing in Children aiming to identify, evaluate and report on good practices for investing in children, in particular related to ECEC, parenting support and child participation. We are very interested in participating in this platform as many of our members provide support to children with disabilities, as well as to their families, consequently playing an important role in the fight against child poverty.

2. Making the best use of the EU Funds to support social investment

EASPD also generally supports the actions showing how to best use EU funds to support this social investment. EASPD particularly welcomes the new Employment and Social Innovation (EaSI) programme of the European Commission. However, significant change will not be possible unless there is a clear change of direction in terms of austerity measures and spending cuts in social welfare, which is currently the norm in most EU Member States. Nevertheless, EASPD considers the new EaSI programme to be an important step in the recognition of social investment as a whole.

Response to deliverables

Many Member States (MS) have undertaken consultations to ensure that all stakeholders, including civil society organisations (CSO), contribute to the priorities in Operations Programmes and Partnership agreements. EASPD welcomes that the European Commission (EC) engages in policy guidance on the use of ESF funds to support implementation of social investment. EASPD believes that it is, however, essential that all stakeholders, and particularly those contributing to social cohesion and investment such as social businesses and service providers, are also included in a process of monitoring and evaluating the implementation of the operational programmes in the MS. The EC should thus support and ensure the application of the partnership principle throughout the funding period 2014-2020. To this end, EASPD proposes that part of these funds be used to organise trainings with national and regional authorities on how to best use structural funds to implement the reformed ESF for 2014-2020.

Furthermore, the work programme and the current calls of Horizon 2020 emphasize the need for innovation and modernisation of social policies and services, particularly for elderly and children, social exclusion being a cross-cutting issue. However, attention should also be given to persons with disabilities and particularly to innovative policies for persons with disabilities who are ageing, a group which is often left out in consideration on policy reform and modernisation of services.

EASPD agrees that cost-effectiveness of social protection systems has to be a priority in the light of decreasing and unstable national social budgets. However, cost-effectiveness may not be to the detriment of social protection system that give adequate, tailored and quality support to citizens going through a difficult period of unemployment, illness, etc. in their lives. We believe that social return on investment has to play a major role in the design of reform strategies and should be underlined as main and irremissible criteria in all funding calls.

Although disability is mentioned several times in the Social Investment Package and it can be considered as a cross-cutting issue, the assessment of the effectiveness of conditional cash transfers should also be analysed, specifically taking into account children with disabilities, and particularly children with intellectual and learning disabilities. Conditional cash transfers, particularly to parents in low-income households, might have unanticipated and even negative effects on the development of children with disabilities.

Studies, as well as social policy experimentation, on homelessness focus primarily on street homelessness. The aim of social policy has to be securing citizens a home for life, thus a stable and sustainable living environment. Persons with disabilities often do not have a home of their own as they are housed in institutions and services; they can therefore be considered home-less. We fully support deinstitutionalisation (DI) and hope that the study on effective policies to reduce homelessness and housing exclusion -as proposed by the roadmap- will take DI into account.

EASPD welcomes the concrete support the EC will give to MS in the area of providing support to actors engaged in social experimentation. Member States should however, also be supported and given guidance, on how to upscale existing innovative models. There is a lack of knowledge about social innovation and innovative social business models on the local, regional and national level. This gap has to be closed, working models identified and up scaled, a process needing determined support by the EC. In France, for example, several service providers for persons with disabilities are pursuing innovative ways and have established social business to promote the inclusion of disabled people in the open labour market. Often these social innovators and entrepreneurs know little about each other, and neither do regional or national government entities. Information sharing needs to be

enhanced in order to identify existing good practices, which have proven to be effective, on the ground and upscale these.

3. Streamlining governance and reporting.

EASPD supports the actions aimed at allowing the Commission to better support Member States through better monitoring the outcomes of Social policies and measures by strengthening analytical tools such as the Social Protection Performance Monitor or the European Statistical System. These tools will help to improve the monitoring of the social situations and hopefully bring to air the damage that the current austerity measures are doing in each and every country, especially with regard to those most vulnerable such as children, the elderly AND people with disabilities.

We also believe that the deliverables in this third section are important in terms of knowing what is being done in member states, yet lack reflection on how to create quality jobs in the current context.

Furthermore, although we understand and support the emphasis on children, the elderly and gender gaps, we regret that no action focuses specifically on persons with disability which also represent a vulnerable and growing group in society. More research on disability-related issues would lead to more evidence-based policies in these areas and consequently lead to a better implementation of the UN CRPD. As such, whilst we welcome the efforts for more research on issues such as gender, childhood poverty and pensions, we regret the lack of a deliverable focused on disability.

Response to deliverable

EASPD calls for the adaptation of the WHO global guide on age-friendly cities to the EU context to also take into account persons with disabilities, to create “cities for all”, where no vulnerable group is excluded.