

EASPD's contribution to the budget expenditure tracking and performance framework of the next EU budget

European Commission Public Consultation

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The [European Association of Service providers for Persons with Disabilities](https://www.easpd.eu) (EASPD) is the leading voice of disability services across Europe. Representing over 20,000 services in 50 different countries, we promote human rights and equal opportunities for people with disabilities through effective and high-quality support. Our work focuses on key areas essential to quality support provision. This includes inclusive living, employment, education, early childhood intervention, person-centred technology, workforce development and human resources, arts, culture & sport, and policy impact.

We welcome the opportunity to contribute to the consultation the budget expenditure tracking and performance framework of the next EU budget. EASPD welcomes the European Commission's initiative to create a **simpler and harmonised framework to track all EU budget expenditure**. This approach will improve **clarity, transparency, and comparability** across programmes, reduce administrative burden, and provide citizens and stakeholders with a clearer picture of how EU funds contribute to policy priorities. We strongly support the objective of streamlining monitoring and reporting obligations and ensuring a results-based approach.

EASPD welcomes the opportunity to contribute to the consultation on the budget expenditure tracking and performance framework of the next EU budget. We strongly support the European Commission's efforts to create a simpler and harmonised framework to track EU budget expenditure, which will increase transparency, comparability, and coherence across programmes while reducing the administrative burden.

However, simplification and harmonisation must not come at the expense of **the EU's social objectives**. The next EU budget must uphold the European Pillar of Social Rights (EPSR) and the UN Convention on the Rights of Persons with Disabilities (UNCRPD), ensuring that every euro spent contributes effectively to inclusion, equality, and human rights.

EASPD is concerned that the current proposal risks weakening the social dimension of EU spending. Without binding safeguards, social impact could be diluted, particularly through the inclusion of infrastructure-heavy projects under the social coefficient (SOC) and the removal of

earmarking mechanisms that previously ensured targeted investments in social inclusion, child poverty reduction, and material deprivation.

To reinforce the social dimension of the EU budget, EASPD calls for the following:

1. Make references to the UNCRPD and the European Pillar of Social Rights binding.
2. Exclude infrastructure investments from the SOC coefficient and introduce sub-coefficients for social inclusion priorities.
3. Strengthen governance through the involvement of civil society and the European Parliament.
4. Require indicators to be disaggregated by disability, age, and gender.
5. Reinstate earmarking or sub-coefficients for key social priorities.
6. Reinforce enabling conditions for social investment beyond rule-of-law compliance.

The sections below expand on each of these recommendations and include proposed amendments to the draft Regulation.

This contribution provides detailed analysis and concrete proposals under each of these points. Many of these point are raised also in our joint statement, **100 billion Euros for social spending? The devil's in the details**, that you can read [here](#).

1. Make social rights and disability inclusion binding in the EU Budget

The explicit references in the Regulation to the **European Pillar of Social Rights** and the **UN Convention on the Rights of Persons with Disabilities (UNCRPD)** are welcome. Recital 10 and Article 6 acknowledge accessibility, independent living, and the transition to community-based support. However, these remain **non-binding** and risk being ignored in implementation. EASPD therefore proposes that the principles of social rights and disability inclusion become **enforceable obligations** for Member States through concrete provisions requiring them to demonstrate compliance.

Proposed amendment to Article 6 – Social Policies

- Member States shall ensure that programmes and activities financed under the Union budget *promote the transition from institutional to community-based services and support independent living of persons with disabilities, in line with the UN Convention on the Rights of Persons with Disabilities (UNCRPD). Programmes and activities shall also ensure accessibility for persons with disabilities in all infrastructures, products, and services, including in the built environment, transport, and information and communication technologies.*

6(3a)(new) Each Member State shall demonstrate how its plans contribute to the implementation of the European Pillar of Social Rights and the UNCRPD, including through specific targets and indicators on accessibility, deinstitutionalisation, and community-based support.

2. Guarantee meaningful investment in disability inclusion

EASPD welcomes the inclusion of disability-related intervention fields in Annex I, particularly in education, skills, and social inclusion. However, for these to generate tangible results, they must be supported by targeted funding, coherent reforms, and measurable outcomes.

Key disability-related intervention fields (Annex I):

- Education and Skills: 111 – 115 (inclusive education at all levels), 116 (access of people with disabilities to education), 133 – 134 (up-skilling and re-skilling for persons with disabilities and adults), 132 (up-skilling for marginalised groups, e.g. Roma).
- Reforms: 123 – 126 (education, skills, and early childhood reforms).
- Employment and Social Economy: 52 (support to development and transition of coastal communities, including reskilling), 63–65 (SME and social enterprise support), and 87

(creative, cultural and arts activities and services, relevant for cultural participation and accessibility).

- Accessibility and Inclusion: 90 (media literacy and countering disinformation, with potential accessibility components), 121–122 (education infrastructure, provided accessibility and universal design are guaranteed).

To ensure these areas deliver real inclusion, EASPD recommends that the Regulation:

- Requires Member States to allocate **dedicated funding** for inclusive education, lifelong learning, and employment support for persons with disabilities.
- Embeds **disability inclusion** as a **horizontal principle** across all education and employment policies.
- Introduces **capacity-building** obligations for teachers, trainers, and service providers on inclusive pedagogy and assistive technologies.
- Links education and skills investments with inclusive labour market measures and the social economy.

Proposed amendment to Article 8 – Expenditure Tracking and Performance Framework

- (5) (new) Intervention fields contributing to disability inclusion shall include dedicated indicators to measure accessibility, participation, and transition to employment outcomes of persons with disabilities. Member States shall demonstrate the allocation of sufficient financial resources to intervention fields directly supporting the inclusion of persons with disabilities, in line with their UNCRPD obligations.

3. Exclude Infrastructure-Only Spending from the Social Coefficient

The current proposal counts a range of **infrastructure investments** under the **social coefficient (SOC)**. This risks inflating figures without delivering genuine social impact.

Examples from Annex I include construction and renovation of early childhood education facilities, schools, and universities, and student housing, healthcare infrastructure, social infrastructure, and building to combat homelessness, including climate resilience measures.

EASPD welcomes investments, and renovation of infrastructure but warns that their inclusion under the social coefficient may divert resources away from community-based social services, and action towards social inclusion. Also, if the 14% target is considered as the legacy of the

European Social Fund Plus, this should not include infrastructure investment, which was formerly part of the ERDF.

Proposed amendment to Article 8 – Expenditure Tracking and Performance Framework

- (1) (d) (new) For the purpose of calculating the social coefficient (SOC), infrastructure-only investments shall not be considered social expenditure. A dedicated sub-coefficient for community-based social services, disability inclusion, child poverty, and material deprivation should be introduced to ensure accurate tracking and prioritisation of social spending.

4. Prioritise local and community-based social investment

EASPD cautions that the Regulation’s broad flexibility for Member States may lead to **large-scale investments** being favoured over **local, people-centred initiatives**. This could marginalise small service providers and local authorities who are crucial to delivering inclusive and community-based support.

EASPD therefore calls for **stronger governance and participatory monitoring**, ensuring the involvement of civil society, social partners, and service providers.

Proposed amendment to Article 11 – Evaluation by Member States under Shared Management

- (8) (new) Member States will establish Monitoring committees including representatives of civil society organisations, including organisations of persons with disabilities and social service providers, to ensure transparent tracking and implementation of social expenditure. The European Parliament shall receive annual reporting on the implementation of the social coefficient and related sub-coefficients, with a focus on community-based inclusion measures.

5. Develop disaggregated and meaningful social indicators

The Regulation’s indicators are too generic to assess outcomes for vulnerable groups, particularly persons with disabilities. To enable effective tracking, **data must be disaggregated** by disability, gender, and age, and indicators must measure **social outcomes**, not only outputs.

Proposed amendment to Article 9 – Monitoring and Reporting

(1) Stored electronically. **All performance indicators relevant to social inclusion shall be disaggregated by disability, gender, and age, in accordance with EU data protection legislation. Indicators shall measure not only participation but also quality of inclusion, accessibility, and long-term outcomes for persons with disabilities.**

6. Reinstate earmarking or introduce sub-coefficients for social priorities

Unlike ESF+, the new framework removes earmarking for social inclusion, child poverty, and material deprivation, and replaces enabling conditions with only compliance with rule of law and the Charter of Fundamental Rights. While this emphasis is important, it no longer requires Member States to demonstrate that they have the technical and strategic foundations to make investments successful. As a result of this, the quality and long-term impact of EU funding may be weakened, and enforcement may become uneven due to the political sensitivity of value-based conditionality. The loss of earmarking and enabling conditions compared to the ESF+ and Common Provisions Regulation represents a significant regression. Without dedicated minimum allocations for social objectives, there is no guarantee that the 14% social target will translate into real outcomes.

Proposed amendment – new Article 6 - Social Policies

(3) (new) The Commission shall establish specific sub-coefficients within the social coefficient for the following areas:

- Social inclusion
- Child poverty reduction
- Material deprivation
- Disability inclusion and deinstitutionalisation

6. Re-establish thematic enabling conditions for social inclusion

Unlike the ESF+, the current Regulation no longer requires Member States to demonstrate strategic and technical capacity for effective social investment. Compliance limited to the rule of law and the Charter of Fundamental Rights is insufficient to guarantee sustainable social reform.

Proposed amendment to Article 6 – Social Policies

(2) (new) In addition to ensuring compliance with the Charter of Fundamental Rights and the rule of law, Member States shall *demonstrate the existence of national*

or regional frameworks ensuring the quality, accessibility, and sustainability of social services, including services for persons with disabilities.

Conclusion and Key Messages

EASPD welcomes the Commission's ambition to simplify and harmonise the EU budget's expenditure tracking and performance framework. However, simplification must go hand in hand with **safeguards that ensure the EU's social and human-rights commitments are upheld.**

To ensure that the next EU budget delivers on the promise of "no one left behind," EASPD calls for:

- **Binding obligations** to implement the European Pillar of Social Rights and the UNCRPD.
- **Accurate social expenditure tracking** through sub-coefficients that reflect real inclusion outcomes.
- **Civil society participation** in governance and monitoring.
- **Disaggregated data** that captures the lived realities of people with disabilities.
- **Reinstated social earmarking and enabling conditions** to protect investments in people.

By adopting these measures, the European Union can ensure that the next Multiannual Financial Framework not only simplifies reporting but also strengthens its most essential purpose: **investing in an inclusive, rights-based, and socially sustainable Europe.**