

Consultation on the European Pillar of Social Rights

Fields marked with * are mandatory.

Welcome to the European Commission's online public consultation on the "European Pillar of Social Rights".

Are our social rights fit for the 21st century? The Pillar will identify a number of essential principles to address the challenges in the field of employment and social policies.

We want to involve everyone in shaping the European Pillar of Social Rights. We welcome contributions from citizens, social partners, organisations and public authorities, so have your say!

Please submit your contribution below until the end of 2016.

I. Questions for the identification of the respondent

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Are you replying as an individual or as an organisation?

- Individual
- Organisation

What is the type of your organisation?

- Business
- EU level organisation
- National level organisation

Your EU level organisation is a(n)

- NGO
- Trade Union
- Employers organisation
- Think tank/academia
- Other

*

Name of your organisation or institution:

500 character(s) maximum

Eurodiaconia

***Respondent's first name:**

Heather

***Respondent's surname:**

Roy

***Respondent's email address:**

heather.roy@eurodiaconia.org

*

Postal address of your organisation or institution:

500 character(s) maximum

Rue Joseph II 166
1000 Brussels

Country

For individuals: country of residence.

For organisations: country where the organisation is based or country where the organisation's headquarters are.

Belgium

Register ID number (if you/your organisation is registered in the Transparency register):

If you would like to register, please refer to the following webpage to see how to proceed : <http://ec.europa.eu/transparencyregister/info/homePage.do>

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Your reply:

- Can be published with your personal information** (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)
- Can be published in an anonymous way** (I consent to publication of all information in my contribution except my name/the name of my organisation and I declare that none of it is under copyright restrictions that prevent publication)
- Cannot be published - keep it confidential** (The contribution will not be published, but will be used internally within the Commission)

II. Questions for the consultation

The Commission invites all interested parties to reply to the questions set out in the questionnaire below, together with any additional comments, by 31 December 2016. (*See also [Commission communication "Launching a consultation on a European Pillar of Social Rights", COM\(2016\) 127 final](#)*)

On the social situation and EU social "acquis"

1. What do you see as most pressing employment and social priorities?

2000 character(s) maximum

- Ensure adequate income support across the lifecycle: Existing schemes generally lack effective coordination, as well as an integrated approach to the multidimensional nature of poverty. In some cases, they impose inflexible and heavy sanctions and are insufficient to cover vulnerable individuals' real needs, keeping them locked in a poverty trap instead of improving access to the labour market. Key challenges relate to ensuring adequacy, high coverage and take-up, and providing positive incentives.
- Ensure inclusive labour markets: The flexibilisation of the labour market has led to an increased number of insecure, low-paid jobs. Quality jobs and lifelong learning should be promoted to prevent precarious employment conditions and in-work poverty. Integrated and personalised inclusion pathways should be created to facilitate labour market participation for vulnerable groups, such as the long-term unemployed, young people, persons with disabilities and migrants.
- Ensure universal access to quality, accessible and affordable services: Whilst growing poverty and unemployment rates have increased demand, budgetary consolidation measures have led to service cuts with a negative impact on the accessibility and quality of services for vulnerable groups in particular. Services should be delivered in an integrated way; administrative hurdles should be reduced; service users should be involved in service design and implementation; best practice sharing should be encouraged across borders. Adequate and sustainable financing should be guaranteed, avoiding service disruptions in every case.
- Take coordinated action to tackle homelessness and housing exclusion: All Member States should develop and implement national strategies with clear indicators and monitoring methods. The right to shelter should be ensured. Furthermore, emergency support should be combined with effective preventive measures, especially housing benefits.

2. How can we account for different employment and social situations across Europe?

2000 character(s) maximum

- GDP divide: EU Member States differ significantly in terms of their GDP and income distribution. The purchasing power of those living below the poverty line vary greatly across Member States, as does the percentage of the population facing material deprivation.
- Architectural differences of national welfare systems: Social protection systems vary significantly between countries, for example when it comes to pension levels, the structure and level of unemployment benefits, the adequacy and accessibility of minimum income schemes, the quality and accessibility of social and healthcare services, or the availability of housing-related benefits.
- Lack of effective cross-border coordination: Whilst the primary responsibility for developing and implementing social and employment policies lies with Member States, the EU needs to support and complement national action. However, previous initiatives to take comprehensive European action against poverty, social exclusion and unemployment, and to achieve upward social convergence, have delivered limited results. The Europe2020 Strategy, the Social Investment Package and the Social OMC seem to play an increasingly marginal role on the EU agenda. The European Semester, originally envisaged to become the key instrument to attain EU2020 targets including poverty reduction, continues to prioritise macroeconomic priorities over comprehensive social reform.
- Lack of fiscal space for social investment: Budgetary consolidation measures remain dominant in the context of the European Semester, restricting the space for social investment in Member States to different extents. With the absence of a golden rule to exempt social investment in social, health and education services from the Stability and Growth Pact and Fiscal Compact deficit measures, it remains highly difficult to promote an inclusive growth model and to ensure upward social convergence.

3. Is the EU "acquis" up to date and do you see scope for further EU action?

2000 character(s) maximum

Eurodiaconia supports the call for a framework directive on adequate minimum income, establishing common criteria for adequacy and a monitoring framework. In the 92/441/EEC Council Recommendation of 24 June 1992, EU Member States have committed to ensuring an adequate minimum income for their citizens, defining 'adequacy' in terms of sufficient resources to lead a life that is compatible with human dignity. The 2008 Commission Recommendation profiles adequate income support as a central pillar of an Active Inclusion approach, aimed at supporting vulnerable individuals excluded from the labour market. Adequate Minimum Income schemes are indispensable in allowing EU citizens to participate in society on an equal basis and have a positive effect on both social cohesion and economic growth.

- Firstly, they counteract the socially and politically destabilising effects of growing inequalities by contributing to a social protection floor, ensuring the social inclusion of persons who don't have access to decent employment.

- Secondly, they are of central importance in combating child poverty by preventing the devastation of entire households and breaking the circle of disadvantage which can affect future generations; they can ensure that children of individuals experiencing poverty have equal access to education and develop vocational skills.

- Thirdly, they are automatic stabilisers which boost the domestic economy, supporting reintegration into the labour market by providing longer-term financial. They also provide an essential floor to consumer spending by increasing the purchasing power of marginalised individuals.

On the future of work and welfare systems

4. What trends would you see as most transformative? [Please select at most three from the list below]

between 1 and 3 choices

- Demographic trends (e.g. ageing, migration)
- Changes in family structures
- New skills requirements
- Technological change
- Increasing global competition
- Participation of women in the labour market
- New ways of work
- Inequalities
- Other

5. What would be the main risks and opportunities linked to such trends?

2000 character(s) maximum

- The rapid rise of ageing persons is widening the gap between the demand for health and long-term care services and the supply of quality, accessible care services provided by qualified staff. Informal care is disproportionately affecting women's participation in the labour market. Pensions and benefit systems need to allow for adequate retirement incomes to prevent poverty in old age, whilst remaining financially sustainable in the light of the employment crisis and demographic challenges.
- Migration, particularly in the light of the high influx of refugees, presents both a challenge and an opportunity. If successfully integrated, migrants can contribute relevant skills and help rejuvenate Europe's graying workforce. However, migrants also face higher risks of experiencing discrimination, as well as poverty and social exclusion. They are particularly vulnerable to risks when they are in irregular situations. In the light of rising xenophobia and nationalist sentiments, migrant integration is an increasingly challenging undertaking.
- Labour market flexibilisation has often been portrayed as a key measure to stimulate economic growth and reduce unemployment. However, it has led to an increased number of atypical jobs, often paid less than permanent jobs, and offering less career stability and social security. Flexibilisation has increased job precariousness and the number of persons experiencing in-work poverty. A better balance needs to be achieved between labour market flexibility and security.
- Rising inequalities polarise society by putting more persons at risk of poverty and by increasing social unrest and xenophobia. They constitute a serious threat to the credibility of the European project, with societal groups drifting further apart rather than coming closer together. Inclusive approaches to economic growth and integrated strategies against poverty, as promoted by the Dutch Council Presidency, are urgently needed to prevent the gap from widening.

6. Are there policies, institutions or firm practices – existing or emerging – which you would recommend as references?

2000 character(s) maximum

European level:

- The 1992 Council Recommendation on Adequate Minimum Income
- The European Charter of Fundamental Rights
- The Social Open Method of Coordination and its associated processes
- The Active Inclusion Recommendation of 2008
- The Europe 2020 Strategy
- The Social Investment Package

National level:

- In Denmark, the National Strategy against Homelessness 2008-2013 (“Common Responsibility II”) was a promising initiative, though it lacked effective follow-up.

On the European Pillar of Social Rights

7. Do you agree with the approach outlined here for the establishment of a European Pillar of Social Rights?

- I strongly agree
- I agree
- I disagree
- I strongly disagree

Please specify:

2000 character(s) maximum

Eurodiaconia welcomes the recognition of social protection as an essential element of upward convergence. Well-functioning welfare systems cannot only contribute to economic growth and higher employment rates, but reduce poverty and inequality, promote social cohesion, and help restore confidence in the European project at a critical juncture in its history.

1) The Social Pillar could bring real added value by promoting an integrated approach to social protection. We welcome the fact that the importance of ‘integrated services and benefits’ is explicitly recognised, but it should be mainstreamed throughout the Pillar and connect the Pillar's principles to each other. Reducing it to a separate principle undermines the overarching relevance of Active Inclusion to ensuring both the adequacy and sustainability of social protection.

2) The Pillar resembles a benchmarking exercise rather than a catalyst for social reform. Its principles are not understood as enforceable rights, but rather as ‘points of reference’ to ‘screen employment and social performance of participating Member States’. As such, the Social Pillar currently seems to rely on the same methods of ‘soft coordination’ as its predecessors. What will be its added value, if national governments cannot be effectively held accountable for any lack of impactful policy action?

3) Whereas social dialogue is portrayed as playing a central role in shaping the Pillar, civil dialogue receives less attention. Structural dialogue with NGOs and rights-holders themselves is necessary not just during the design phase of the Pillar, but also during the implementation and evaluation phase. Eurodiaconia and its members call on the European Commission to introduce a clear guidance framework for stakeholder dialogue at national level to promote co-ownership of the Social Pillar.

8. Do you agree with the scope of the Pillar, domains and principles proposed here? (If you wish to provide detailed comments on any of the 20 domains, please see the section "Detailed comments by domain" below)

	I strongly agree	I agree	I disagree	I strongly disagree
1. Skills, education and life-long learning	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Flexible and secure labour contracts	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

3. Secure professional transitions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Active support for employment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Gender equality and work-life balance	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Equal opportunities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7. Conditions of employment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
8. Wages	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
9. Health and safety at work	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
10. Social dialogue and involvement of workers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
11. Integrated social benefits and services	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
12. Health care and sickness benefits	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13. Pensions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
14. Unemployment benefits	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
15. Minimum income	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
16. Disability benefits	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

17. Long-term care	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
18. Childcare	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
19. Housing	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
20. Access to essential services	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Are there aspects which are not adequately expressed or covered so far?

2000 character(s) maximum

- The preliminary outline rightly emphasises the importance of ensuring adequate social protection. However, a key missing element of the current outline is an analysis of the relation between the adequacy and sustainability of social protection. Whilst economic and social goals are portrayed as two sides of one coin, Eurodiaconia and its members have observed that real tensions can manifest themselves in practice. It is imperative that the adequacy of social protection is not undermined by fiscal concerns.
- In its current shape, the Pillar seems focused on enhancing employability rather than upholding the dignity of individuals. The 'equal opportunities' principle is aimed at enhancing labour market participation of under-represented groups (third country nationals and ethnic minorities) and fails to address unequal access to education, healthcare and social services. The third axis around social protection stresses the importance of activation measures and the risk of 'benefit traps', disregarding the fact that some persons might be unable to work.
- Whilst Eurodiaconia welcomes the emphasis on integrated social benefits and services, the definition of 'essential services' is too narrow (for example, it doesn't include financial services). Furthermore, it remains unclear how the different services mentioned in the Pillar should be financed.
- An important element currently missing is a European minimum standard for debt settlement. Eurodiaconia members have observed that service users are very often unable to access the existing processes for debt settlement as they are based on stringent criteria (e.g. being in employment or having a certain income). The result is that sometimes debt settlement is unavailable for people who need it the most. An effective insolvency framework, looking particularly at accessibility for the most vulnerable, could bring added value to a future Pillar.

9. What domains and principles would be most important as part of a renewed convergence for the euro area? (Please select maximum 5)

between 1 and 5 choices

- 1. Skills, education and life-long learning
- 2. Flexible and secure labour contracts
- 3. Secure professional transitions
- 4. Active support for employment
- 5. Gender equality and work-life balance
- 6. Equal opportunities
- 7. Conditions of employment
- 8. Wages
- 9. Health and safety at work
- 10. Social dialogue and involvement of workers
- 11. Integrated social benefits and services
- 12. Health care and sickness benefits
- 13. Pensions
- 14. Unemployment benefits
- 15. Minimum income
- 16. Disability benefits
- 17. Long-term care
- 18. Childcare
- 19. Housing
- 20. Access to essential services

Comments:

2000 character(s) maximum

- An integrated, life cycle-approach to social protection is necessary to prevent persons from falling through the gaps of national welfare systems. Adequate minimum income schemes and adequate access to services can meaningfully complement active labour market policies by supporting those who don't find (decent) work.
- Adequate Minimum Income schemes are indispensable in allowing EU citizens to participate in society on an equal basis and strengthening the democratic legitimacy of the European project. Rather than being a burden on the welfare system, AMI schemes can have a positive effect on both social cohesion and economic growth.
- The rapid rise of ageing persons is widening the gap between the demand for health and long-term care services and the supply of quality, accessible care services provided by qualified staff. Pensions and benefit systems need to allow for adequate retirement incomes to prevent poverty in old age.
- The number of people suffering from homelessness has increased in recent years, now including 'new' faces of homeless such as young people, women and migrants. Stronger EU action is needed, both in terms of policy and funding, to finally end this severe form of extreme poverty and material deprivation.
- Access to essential services is an integral element of an Active Inclusion approach, though the scope suggested in the current outline of the Pillar needs to be broadened so as to include adequate access to financial services.

10. How should these be expressed and made operational? In particular, do you see the scope and added value of minimum standards or reference benchmarks in certain areas and if so, which ones?

2000 character(s) maximum

Generally, the European Semester should be a core tool to operationalise the principles outlined in the Social Pillar. Over the past years, the European Semester has been gradually drifting away from the Europe2020 Strategy. With an 'inclusive growth' dimension fading into the background, many Eurodiaconia members observe that the Semester has become an instrument driving macroeconomic and fiscal consolidation measures rather than poverty reduction and social inclusion. A clear connection between the Pillar and the Semester could stimulate the implementation of the Pillar's principles whilst rebalancing social and economic objectives within a central existing governance process. In this context, social impact assessments should be promoted as a key tool to ensure that budgetary consolidation and economic growth strategies do not undermine social priorities. Particularly with regards to Minimum Income, reference budgets should be promoted as a key tool to determine adequate income levels in different national contexts and to ensure they correspond to the real needs of beneficiaries. In this context, Eurodiaconia welcomes the European Commission's work on promoting a common European methodology to improve cross-country comparability and mutual learning.

Detailed comments by domain

If you wish to provide detailed comments on any of the domains, please select one or more from the list below and fill the table(s) and comment box(es) underneath. (A detailed description of the domains and principles is available in the [Annex "A European Pillar of Social Rights - Preliminary Outline"](#) to the [Commission communication "Launching a consultation on a European Pillar of Social Rights"](#), COM(2016) 127 final).

- 1. Skills, education and life-long learning
- 2. Flexible and secure labour contracts
- 3. Secure professional transitions
- 4. Active support for employment
- 5. Gender equality and work-life balance
- 6. Equal opportunities
- 7. Conditions of employment
- 8. Wages
- 9. Health and safety at work
- 10. Social dialogue and involvement of workers
- 11. Integrated social benefits and services
- 12. Health care and sickness benefits
- 13. Pensions
- 14. Unemployment benefits
- 15. Minimum income
- 16. Disability benefits
- 17. Long-term care
- 18. Childcare
- 19. Housing
- 20. Access to essential services

11. Integrated social benefits and services

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

The definition of the domain should rely less on the organization of integrated services and more on the purpose of such integration, putting users at the centre of service provision. In fact, the stress on access and effectiveness overlooks equally important dimensions of service provision. Firstly, quality should be core to the domain and its definition fully developed. The present mention to effectiveness is a piecemeal approach to quality, which should encompass process, users' satisfaction and wellbeing, and the quality of outcomes; therefore, well beyond results only. Secondly, it is essential to incorporate user participation, which is key to a person-centred provision of (integrated) services that is tailor-made to the specific needs of each user.

The principle of integration between benefits and services is essential for social delivery and, therefore, should be mainstreamed across the Pillar, well beyond an employment-centric stress on work inclusion services only (as suggested by the limited definition of the domain). Long-term care, disability, health care and sickness benefits and services should also envisage integration as a desirable goal. The role of civil society organisations should also be recognized among the different actors needed to respond to diverse, complex service demands from a partnership approach which leverages different expertise and know-how.

The objective of addressing poverty is also a very modest approach to the potential impact of integrated services, which should aim to income maintenance and the provision of sustained wellbeing for users. The domain should also clarify how the alignment between social benefits, active support and social services should be brought in practice. The reference to such three-fold alignment as key to effective support is fully welcome, as it is coherent with an active inclusion logic.

15. Minimum income

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

Eurodiaconia welcomes the emphasis on ensuring adequate minimum income as an integral part of a comprehensive active inclusion strategy. Insufficient benefit levels, limited coverage and take-up are rightly mentioned as core challenges. Point 15a mentions that ‘‘benefits shall include requirements for participation in active support to encourage labour market (re)integration.’’ This statement fails to differentiate between different types of activation. Too often, activation measures are not aimed at providing decent jobs but any job (regardless of a person’s qualifications), leading to irregular employment and precarious contracts. Active labour market measures need to empower individuals and refrain from a one-size-fits-all approach, which fails to meet the specific needs of particularly vulnerable individuals such as long-term unemployed persons and those coping with mental health issues. Whilst mentioning ‘strict conditionality’, there is no analysis of the role of sanctions. It is imperative that sanctions for individuals who fail to comply with specific conditionalities do not jeopardise a person’s livelihood; that the length of the sanctions is not excessive; and that alternative measures are considered in cases where sanctions may affect other persons and create new social risks, such as pregnant women, parents with children, informal carers, etc. Whilst it is mentioned that many MI schemes fall below the poverty threshold, a description of methods to safeguard adequate benefit levels is missing. AMI schemes should correspond to the real needs of their users by relying on a mixed method approach. Apart from the 60% equivalised median income indicator, additional factors such as reference budgets and statistical analyses of consumption patterns should be considered. Indexation mechanisms are necessary to ensure that adequate minimum income is in line with price developments, and the purchasing power of beneficiaries does not decrease.

17. Long-term care

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

The challenges described in domain 17 should not overshadow the person-centred dimension of LTC services. This perspective is core to the definition of the principles and right to LTC and should underpin its definition in the Pillar. In this way, the active role of LTC users and their families should be introduced in the domain. Adopting an individualized, tailor-made approach does not necessarily translate into more expensive LTC. On the contrary, it will lead to more effective outcomes and strengthen the preventive (and future cost-saving) side of interventions. The present formulation of the domain also fails to recognize the potential of integrated care. Acknowledging this would, in fact, be in line with domain 11, where the call for integrated social benefits and services is formulated as a general principle. Integrating care, services and supporting activities means that the design and delivery of care is made in a more effective manner, better suited to users' needs. Integration is also more efficient, making it a winning strategy to face the dependency challenge.

The emphasis on quality in the current draft is welcome. However, quality should not be subordinated to affordability, as the wording of point 17.a) suggests. Also, the Pillar should boost the European Voluntary Quality Framework for social services as a reference to promote quality LTC across the EU. The focus on the financial challenge may solidify a restricted approach to the financing of care services, seeing them as a cost only. For this reason, the domain should incorporate a social investment logic where positive effects –both economic and social– of investing in services are also recognized. By stressing demographic challenges, the present formulation of the domain seems targeted at older persons only. Persons with disabilities and long-term illnesses, as well as any other users of LTC should be equally included in an explicit manner.

19. Housing

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

Eurodiaconia agrees with the challenges mentioned, especially the lacking availability of affordable housing. More investment into social housing and cheap housing options is necessary to support vulnerable people. Nevertheless, the phrase “Barriers to receiving cash housing assistance and to affordable social housing [...] are increasing the risk of homelessness” is not strong enough. These barriers do not only increase the risk of homelessness, but can actually cause homelessness. They prevent people who struggle to pay their bills to stay in their housing, and prevent vulnerable people suffering from homelessness to escape it by finding suitable housing options or assistance. Regarding access to shelters, Eurodiaconia fully supports the need to enable universal and rapid access. Specifically for migrants and refugees, the access claims are not always clear. The EU should encourage unconditional access to emergency accommodation and shelters for all people and foster a better understanding of rights for intra-EU migrants who also often struggle to access supported accommodation in other EU countries, according to reports from Eurodiaconia members (see Eurodiaconia report “The role of social innovation and investment in the homelessness sector”, 2016), and the Commission report “Confronting homelessness in the European Union”, pp. 8. Eurodiaconia strongly agrees that shelters need to be adapted to individual needs, also for people with specific care needs such as women, young people, elderly people and migrants. Homeless people often suffer from an interconnected and complex range of problems that need to be addressed to effectively re-integrate them into society. That is why innovative and adapted services are especially relevant in this context as they, unlike general approaches, react to the diversifying needs of homeless people.

20. Access to essential services

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

This domain should be expanded so as to include accessible and transparent financial services. According to a Flash Eurobarometer survey, basic financial services are inaccessible for 30 million people, i.e. 7% of the EU population (Flash Eurobarometer 282, Consumers' Views on Switching Providers, European Commission).

Financial inclusion entails open access to basic financial services for all persons, regardless of socio-economic or legal status (for example, people are entitled to have access to a credit or a bank account). It also entails service transparency and appropriateness, as persons may have access to a service but use it ineffectively, or find that it does not correspond to their needs. This is based on an understanding of banking services as public goods, essential to social participation and therefore to the achievement of social cohesion.

A lack of financial inclusion directly and disproportionately impacts the most vulnerable members of society; the consequences are disproportionately high on elderly persons and individuals with lower education.

Contact

EMPL-EUROPEAN-PILLAR-OF-SOCIAL-RIGHTS@ec.europa.eu
