

Contribution of the EU Alliance for Investing in Children to the European Commission Public Consultation on the Child Guarantee

On 19 August, the European Commission launched a public consultation on the Roadmap for the Child Guarantee. The EU Alliance for Investing in Children welcomes the commitment and progress of the European Commission towards the development of the Child Guarantee. We particularly welcome the European Commission's intention to launch the Child Guarantee in the form of a Council Recommendation with an implementation and monitoring framework.

Notwithstanding these positive developments, the EU Alliance for Investing in Children calls the European Commission to commit to a rights-based, integrated approach to tackle child poverty in the EU and broaden the scope of the Child Guarantee and the Council Recommendation by:

- 1. Proposing that the multiannual strategies are built around the three pillars of the 2013 Investing in Children Recommendation.**
- 2. Incorporating parents' access to resources (pillar 1) and children's access to decision making (pillar 3) in the Child Guarantee Council Recommendation.**

Main Recommendations of the EU Alliance for Investing in Children:

The EU Alliance for Investing in Children has been calling the European Commission to take a rights-based integrated approach to tackling child poverty and to incorporate the three Pillars of the Investing in Children Recommendation¹ in its proposal for the European Child Guarantee. The importance of this approach has been also reflected in the Final Report of the Child Guarantee Feasibility Study Phase I, which proposes that a Council Recommendation on the Child Guarantee would "complement and build on" the Investing in Children Recommendation.²

This approach would be vital if the European Commission is to still ensure that children and families are supported holistically to exit poverty. We therefore call on the European Commission to do so in the two following ways:

- 1) Propose that the multiannual strategies are built around the three pillars of the 2013 Investing in Children Recommendation.**

Given the nature of the national strategies, giving a long term perspective and ambitions for significantly reducing child poverty and social exclusion, they should look at the issue in a more holistic way taking into account family (particularly parent's or main carer) income from work or welfare benefits, and children's access to decision making, citing the Investing in Children Recommendation three pillars. In the strategies EU Member States will outline how they intend to tackle child poverty through different policies (e.g. work-life balance policies, minimum income and minimum wage, access to tailored benefits), through the development of service areas and with the meaningful engagement of children and young people. The service areas will be outlined in the Child Guarantee Action Plans.

¹ Access to resources, access to affordable quality services, children's right to participate

² Chapter 9 of the Final Report of the Child Guarantee Feasibility Study Phase I
<https://ec.europa.eu/social/main.jsp?catId=1428&langId=en>

2) Incorporate parents' access to resources and children's access to decision making in the Child Guarantee Council Recommendation.

a) Broaden the scope of the Child Guarantee by incorporating parents' access to resources under each service area of the Child Guarantee Recommendation

Parents' inadequate access to resources has been underlined in the findings of the feasibility study as a main driver for child poverty. Poor children grow up in poor families. Although children's access to affordable quality services and participation in culture and leisure activities are crucial for their development and for ensuring equal opportunities for all, there is a need to support parents and primary caregivers in their role and ensure they have adequate income to sustainably provide this support. Their participation in the labour market in decent jobs, fair minimum wages, access to adequate unemployment benefit and minimum income, as well as non-stigmatising in-kind support and tailored benefits are crucial components of preventing and tackling child poverty and social exclusion. This is particularly crucial in the context of COVID-19 which is generating increased child and family poverty and social exclusion due to reduced working, rising unemployment, low levels of income support and rising prices³. The EU Alliance for Investing in Children proposes to the European Commission to incorporate parents' access to resources under each service area of the Child Guarantee Recommendation. This would empower parents and primary caregivers to ensure that children have access to quality and affordable services. For example, under the service areas related to housing and nutrition, the European Commission could underline the need to support parents'/families' adequate income and could propose that Member States complement cash income and adequate, coherent and efficient benefits to parents living in poor households. This would contribute to children's access to a healthy and nutritious meal every day at home (apart from children's access to quality and free/affordable school meals) and to adequate housing conditions at affordable costs. When it comes to children's access to early childhood education and care, and education, Member States should pay attention to the design of labour market policies that promote equality, access to decent jobs, allowing parents to maintain their work commitments whilst keeping a strong focus on the child's best interests⁴.

b) Safeguard the right of children growing up in poverty to have their voices heard.

The EU Alliance for Investing in Children recognises that the EU Strategy on the Rights of the Child will bring children's rights and children's voices in the heart of EU policy making. However, it is intended to have a broader scope covering the rights of all children in the EU and abroad. Children growing up in poverty and social exclusion (e.g. children growing up in institutional care, children with disabilities) should have their voices heard in all decision-making processes that affect their lives at local, national and EU level. Children should participate as partners in the development and monitoring of the national multiannual strategies and Child Guarantee Action Plans.

³ <http://www.alliance4investinginchildren.eu/joint-statement-on-protecting-children-and-their-families-during-and-after-the-covid19-crisis/>

⁴ Commission Recommendation of 20 February 2013 *Investing in children: breaking the cycle of disadvantage* (2013/112/EU)

Positive elements of the Roadmap description and recommendations for strengthening

The EU Alliance for Investing in Children particularly welcomes the following proposals and urges the EU institutions to maintain or reinforce these provisions:

- a) **Welcoming:** The proposal to launch the Child Guarantee in the form of a Council Recommendation.

One of the reasons that the 2013 Investing in Children Recommendation⁵ was not implemented, was due to lack of political commitment and ownership at national level. The suggestion to shape the Child Guarantee in the form of a Council Recommendation will bring new political prominence and will provide the necessary momentum for EU Member States to commit to tackling child poverty.

- b) **Welcoming:** The proposal for multi-annual national strategies, covering at least the period until 2030.
Proposal for reinforcement: Ensure their alignment with national antipoverty strategies and the Sustainable Development Goals, setting targets for reducing child poverty.

The EU Alliance for Investing in Children supports this proposal as it provides a long-term vision and insight into Member States' strategic plans for tackling child poverty. However, it is important to ensure that:

- Strategies on child poverty feed into the national strategies on poverty reduction and social inclusion that EU Member States are asked to develop as part of the enabling condition 4.3 (Common Provisions Regulation for the period 2021-2027).
- Strategies on child poverty are aligned with each Member States' commitment towards the fulfilment of the Sustainable Development Goals and SDG1 in particular. **The EU Alliance has already proposed to the European Commission to set an EU target for child poverty reduction, to be aligned with the targets of SDG1 to alleviate extreme poverty and to half child poverty by 2030.** This will lift at least 55 million people, among whom 10 million children, out of poverty and social exclusion by 2030, based on the multidimensional AROPE. Additional indicators will be needed though to assess the situation of those further left behind.⁶ The national strategies and the Action Plans should be monitored against this target.

- c) **Welcoming:** The proposal for Child Guarantee National Action Plans.
Proposal for reinforcement: Set up a monitoring and reporting framework.

The EU Alliance for Investing in Children has been calling for the development of national Child Guarantee Actions Plans. They should illustrate EU Member States' challenges and priorities when it comes to tackling child poverty and social exclusion; identify groups of children in vulnerable situation; and describe what kind of policies and EU and national investments will be put in place to support

⁵ Commission Recommendation of 20 February 2013 *Investing in children: breaking the cycle of disadvantage* (2013/112/EU)

⁶ For more please consult the Alliance's proposal on a Child Guarantee <http://www.alliance4investinginchildren.eu/proposal-for-a-council-recommendation-on-the-child-guarantee-for-the-wellbeing-of-all-children-across-the-eu/>

them. The Child Guarantee multiannual strategies and Action Plans should be submitted to the European Commission within three months from the adoption of the Child Guarantee Council Recommendation and should be agreed no later than six months upon the adoption of the Council Recommendation. The Action Plans should be monitored on an annual basis. Member States should report to the European Commission on the implementation of the Action Plans and results should be reflected in the European Semester cycle and in the monitoring of the Action Plan of the Pillar of Social Rights. Member States will be able to update their Action Plans when needed to meet challenges occurring within the Member States.

d) Welcoming: The reference to EU funding instruments that will support the implementation of the Child Guarantee.

Proposal for reinforcement: Ensure that EU funds are used strategically and in line with the Child Guarantee Action Plans and multiannual strategies.

The EU Alliance for Investing in Children welcomes the specific reference to the European Commission's and European Parliament's proposal for EU Member States to earmark 5% of their ESF+ resources to tackle child poverty. We urge the Council of the EU to support this proposal.

However, the EU Alliance urges EU Member States to wait with using the 5% ESF+ resources⁷ for tackling child poverty until the multiannual strategies and Child Guarantee Action Plans have been developed and agreed. This will allow strategic use of ESF+ and monitoring of its use to tackle child poverty aligned with the priorities set in each country.

We also welcome the reference to other EU resources under the next Multiannual Financial Framework – such as the European Regional Development Fund, the Asylum and Migration Fund, the InvestEU and the Erasmus Plus. These funds have specific priorities related to poverty reduction and social inclusion and should be used strategically and in line with the priorities included in the national Child Guarantee Action Plans to support the necessary reforms. In addition to these funds, the EU Recovery and Resilience Facility should be foreseen to support the implementation of European Child Guarantee and national budgets should be prioritised for the implementation of the Action Plans as EU funds can trigger, but not fully implement reforms.

e) Welcoming: The broadened categorisation of children in vulnerable situations tailored to each country's needs

Whilst the Feasibility Study on the Child Guarantee (Phase I.) identified four target groups of children in vulnerable situations for the purpose of the study (children with disabilities, children in institutions, children in migration, children growing up in precarious situations) and while the EU Alliance agrees that these children are among the most vulnerable groups and should be particularly supported, it is important that in the design of the National Action Plans, Member States define “the precise actions and priority target sub-groups” of children in need, acknowledging differences and commonalities across Europe. The implementation of the Child Guarantee should be tailored to the challenges and needs of each country, increasing the national ownership of the initiative.

f) Welcoming: The consultation with civil society for the design of the Child Guarantee.

⁷ Or equivalent agreed in the trilogues on ESF+ regulation

Proposal for reinforcement: Civil society should be a key actor in the implementation of the Child Guarantee.

Although the EU Alliance for Investing in Children welcomes the European Commission's continuous cooperation with the civil society for the design of the Child Guarantee, it is important to ensure that multi-sectoral civil society is participating as a key actor in the implementation of the Child Guarantee at national level. Civil society organisations are often the ones supporting children and their families at local level and in various sectors. Civil society has especially stepped in during the COVID19 crisis and often through limited resources it has supported children in most vulnerable situations while services were closed to continue their education or to be medically and emotionally supported. Civil society has also supported families hit by unemployment offering them in kind support or guidance. Civil society organisations should be at the heart of the implementation of the Child Guarantee. Organisations should be consulted on the development of multiannual strategies and Child Guarantee Action Plans. EU and national resources should also be foreseen to fund civil society organisations to run projects that will support the implementation of the Child Guarantee. To do so the reduction of co-financing requirements for civil society should be considered where possible.

- g) **Welcoming: The reference to a rights-based approach in tackling child poverty.**
Proposal for reinforcement: This approach should be incorporated in the Child Guarantee through horizontal principles that will guide EU Member States when implementing the Child Guarantee

The EU Alliance for Investing in Children welcomes the proposal that the Child Guarantee shall comply with Article 24 of the EU Charter of Fundamental Rights and the European Social Charter. The Alliance recommends to add horizontal principles to guide EU Member States⁸ in the implementation of the Child Guarantee. EU Member States should commit to implement the Child Guarantee in a rights-based approach always taking into consideration the best interest of the child, recognising children as independent rights holders whilst fully acknowledging the importance of supporting families as primary carers. As already proposed by the European Commission, the implementation of the Child Guarantee should be in line with the Treaty on the European Union and the Charter of Fundamental Rights of the EU. The Child Guarantee strategies and Action Plans should also be aligned with the UN Convention on the Rights of the Child as well as other relevant UN Conventions (e.g. the UN Convention on the Rights of Persons with Disabilities which have been ratified by the European Union).

- h) **Welcoming: The reference to Principle 11 of the European Pillar of Social Rights**
Proposal for reinforcement: The implementation of the Child Guarantee should be underpinned by other initiatives in the scope of the Pillar of Social Rights.

Whilst recognising that the Child Guarantee Recommendation will contribute to the implementation of Principle 11 of the European Pillar of Social Rights and will form part of the Action Plan for the implementation of the Pillar, the relevance of other Principles should also be taken into account in tackling child poverty. Strengthening of essential services to support children growing up in poverty should not be seen as a panacea to child poverty reduction. An integrated approach is needed. For example, Principle 2 on gender equality, Principles 17 on inclusion of persons with disabilities and 19

⁸ In line with the Horizontal Principles of the 2013 Investing in Children Recommendation

on housing and assistance to the homeless will also support the objectives of Principle 11 and vice versa.

The Child Guarantee should furthermore ensure coherence and complementarity with initiatives being undertaken or planned by the European Commission as part of the Action Plan on the Pillar of Social Rights such as the Disability Strategy, the Roma Strategy and the Minimum Income Framework.

Endnote

The EU Alliance for Investing in Children has been advocating for a multidimensional, rights-based approach to tackling child poverty and promoting child well-being since 2014.

This statement was endorsed by the following partner organisations of the EU Alliance for Investing in Children:

Alliance for Childhood European Network Group; ATD Quart Monde; Caritas Europa; COFACE Families Europe; Don Bosco International; Dynamo International – Street Workers Network; Eurochild; Eurodiaconia; EuroHealthNet; European Association of Service Providers for Persons with Disabilities – EASPD; European Anti-Poverty Network – EAPN; European Federation of National Organisations Working with the Homeless – FEANTSA; European Parents’ Association; European Public Health Alliance – EPHA; European Social Network – ESN; Inclusion Europe; Lifelong Learning Platform; Lumos; Mental Health Europe; Make Mothers Matter; Platform for International Cooperation on Undocumented Migrants (PICUM); Roma Education Fund; Save the Children; SOS Children’s Villages International.

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