



FEANTSA response to the European Commission Communication
“Working together, working better :
A new framework for the open coordination of social protection and inclusion policies in the
European Union”
([EN](#)/[FR](#)/[DE](#))

FEANTSA, European federation representing 100 national and regional homeless service providers in 30 European countries, welcomes the Communication on the launch of the social protection and social inclusion strategy which proposes new common objectives for the three strands of the new strategy (social inclusion, health, pensions) and the revised procedures to apply from 2006. Homelessness¹ being one of the societal problems treated under the streamlined social protection and social inclusion strategy, FEANTSA is directly concerned by this Strategy and wishes to respond to the measures and objectives proposed under the social inclusion strand, also indicating where FEANTSA resources can be useful.

FEANTSA’s response is based on the understanding that the Open Method of Coordination (OMC) is a policy mechanism used at EU level to coordinate and nurture national policies in different fields. The new streamlined OMC in the field of social inclusion, health and pensions, will be used as a clear framework to strengthen exchange and mutual learning of social protection and social inclusion policies, **and thereby to improve social protection and social inclusion for citizens of the EU.**

¹ Homelessness as defined in ETHOS – European Typology on Homelessness and housing exclusion – see Annex

Summary of paper

Now that homelessness is firmly on the EU agenda – see EPSCO Council decision of March 2005 [EN/FR](#) – FEANTSA is ready to take up the challenge of implementing homeless policies in Europe and believes that **5 elements of the new streamlined strategy proposed in the Commission Communication** will be crucial for supporting all relevant actors in improving the fight against homelessness.

Four of these elements existed in the previous EU social inclusion strategy and will continue under the streamlined strategy:

1. The voluntary nature of this process aiming at coordination (not harmonisation) of social inclusion policies based on common European objectives agreed on by all Member States
2. Stimulating policy development through mutual learning
3. The presence of a clear framework for dialogue between the European Commission, Member States and representatives of civil society
4. The flexibility of the process (based on *soft law*) which allows for feeding into other policy areas, and integrating the priorities of other policy areas in the streamlined process

The **fifth** element is a new element:

5. The main focus on implementation of social inclusion policies

This paper clarifies FEANTSA's view on these 5 elements, and explains how it perceives the role of FEANTSA and the place of homelessness in the overall process on social protection and social inclusion.

The key messages are the following:

- The European Commission should take up the 6 social inclusion priorities (including the treatment of homelessness) from the **call for action** from the 3/4 March 2005 EPSCO Council of Ministers. The best place to integrate these six priorities would be the European Commission Guidance Note
- The EPSCO Council of Ministers of 10 March 2006 should **remind** heads of state and government at the March Spring Summit 2006 to take up the 6 social inclusion priorities which were agreed upon last year **as priorities for all member states**
- The new streamlined process needs such clear priorities in order to make the process **stronger**, to allow for **mutual learning** (since comparison of clear policies will be possible) and thereby to make **implementation** more likely
- The three objectives proposed in the social inclusion strand of the new streamlined strategy (very much in line with the FEANTSA **toolkit**) should serve as a basis for developing an integrated strategy to combat homelessness in the streamlined **National Strategies** on social protection and inclusion
- The European Commission and Member States should strengthen cooperation with European networks of service providers like FEANTSA not only for policy development and monitoring as in the previous social inclusion process, but also for **policy implementation** (given that FEANTSA members are directly involved in the implementation of homeless policies at national and local level)
- To this end, FEANTSA is ready to take up the call for action from the EPSCO Council on the treatment of homelessness, and is gradually setting up a **European Forum to combat homelessness** (of all relevant stakeholders). The Forum would have as its principle aim to reduce the level of homelessness through the improvement of policy-making, which we hope to achieve mainly through transnational exchanges and comparison of policies.

1. A **voluntary process** aiming at coordination (rather than harmonisation) of social inclusion policies based on **common European objectives**

Coordination is an appropriate method of tackling homelessness and housing exclusion at EU level given that these are local phenomena which require local solutions rather than common harmonised EU solutions. The fact that no European policy has been imposed on national/local authorities has enabled many, although not all, Member States to develop policies to tackle homelessness according to the nature of homelessness and the profile of homeless people in their respective countries.

In this context, the common objectives agreed by the European Commission and the Council of Ministers, are crucial to guide Member States in their national policy-making. From the research and policy exchange under the EU social inclusion strategy (2001-2005), homelessness has emerged as a clear priority in the area of social inclusion for the European Union - the **EPSCO Council of March 2005** outlined 6 priorities ([EN](#)/[FR](#)):

1. Prevention of child poverty
2. Supporting the caring capacity of families
3. Promoting the equality of men and women and reconciling work and family life
4. Improvement of social services
- 5. Treatment of the phenomenon of homelessness**
6. Development of new approaches to the integration of ethnic minorities and immigrants

Homelessness (along with the other thematic priorities outlined above) has therefore clearly emerged as a political priority, and yet none of the 6 priorities of the EPSCO Council have been explicitly taken up in the new objectives proposed by the European Commission to guide policy-making in the social inclusion strand of the new strategy.

Nevertheless, the Commission Communication clearly states the following (p.5):

“Particularly for social inclusion, the more general presentation of objectives should allow Member States to focus on the policy priorities most important in each national context, for example, homelessness, child poverty and the alienation of youth, immigrants and ethnic minorities, disability...”

This is a clear reference to the priorities of the EPSCO Council (listed above) which should serve as a basis for outlining clear guidelines in the European Commission **Guidance Note** (i.e. administrative note with guidelines for preparing the national strategies on social protection and social inclusion) given that these are 6 emerging priorities for **all** Member States.

The 3 new social inclusion objectives proposed in the Commission Communication (pp.5-6) are as follows:

Objective 1. Ensure the active social inclusion of all by promoting participation in the labour market and by fighting poverty and exclusion among the most marginalised people and groups

Objective 2. Guarantee access to the basic resources, rights, and social services needed for participation in society, while addressing extreme forms of exclusion and fighting all forms of discrimination leading to exclusion

Objective 3. Ensure that social inclusion policies are well-coordinated and involve all levels of government and relevant actors, including people experiencing poverty, and that they are efficient and effective and mainstreamed into all relevant public policies, including economic, budgetary, education and training policies and structural fund (notably ESF) programmes and that they are gender mainstreamed.

Given the general nature of the 3 new social inclusion objectives, it is important that the European Commission Guidance Note clearly state that all three common objectives of the new strategy be used to develop **integrated strategies** in the social inclusion areas mentioned in the EPSCO Council priorities.

Take the three new objectives applied to homelessness for example. Homelessness is a societal problem which requires actions on all three fronts mentioned in the three objectives.

Objective 1 covers reintegration (or active inclusion) of people experiencing homelessness in the labour market, and fighting poverty and exclusion amongst those suffering from the most extreme form of homelessness – rough sleeping. Many homeless service providers work on labour market reintegration of their service users and, in some cases, on providing meaningful occupation for people experiencing homelessness who are unable to work in the mainstream labour market.

Objective 2 covers both the prevention of homelessness, and housing rights of people experiencing homelessness. Access to services (housing, healthcare, emergency shelters, advice centres) is crucial for preventing evictions, preventing worsening of health problems, preventing homelessness through education and information services. FEANTSA research on these different areas (see www.feantsa.org) has confirmed the effectiveness of prevention.

Access to rights includes housing rights – housing is in itself a material precondition for exercising fundamental rights but is also crucial for access to other basic social rights (education, social services, transfer incomes, etc), and some countries are starting to adopt a rights-based approach to developing homelessness strategies.

Objective 3 covers networking to combat homelessness and regular cooperation between all levels of government and homeless service providers, homeless user organisations, employment services, housing associations, health institutions, national statistics institutes in preventing homelessness, providing emergency support, providing reintegration support. Such involvement of actors is the most effective means of mainstreaming homelessness/housing exclusion issues in other related areas such as the employment, economic growth, fundamental rights, urban policy, and regional policy. It is therefore crucial to create an operational partnership between all stakeholders.

The FEANTSA Report proposing a basis for a toolkit (10 approaches) for developing an integrated strategy to combat homelessness (see full report [EN/FR](#)), is very much in line with the 3 social inclusion objectives proposed. Indeed, the three objectives of the social inclusion strand cover crucial aspects of social exclusion, and provide a clear framework for developing integrated strategies to help different vulnerable groups with different needs.

We **recommend** that each National strategy contain an integrated long-term strategy to combat homelessness based on all three objectives of the social inclusion strand. It is only by developing policies in this comprehensive way (rather than short-term initiatives or micro-projects) that they will have any impact on reducing homelessness, and that funds will be well invested.

2. A process stimulating policy development through **mutual learning**

Policy development through mutual learning and comparison of policies is at the very basis of the Open Method of Coordination. For this reason, it is crucial that the national reports of the Member States are of high quality with targeted measures focussing on the different societal problems covered in the social inclusion field – the 3 social inclusion objectives should allow for an integrated strategy in all areas of national concern outlined in the EPSCO Council priorities.

The national reporting (strategies, updates, implementation reports) under the EU social inclusion strategy has been useful for selecting specific policies for analysis and exchange in the framework of European networks, peer reviews, transnational projects, studies, European and national conferences (although the quality of the reports naturally varied from country to country). Certain homeless policies have been highlighted as good practices, have been examined, and in some cases have been transferred to different countries of the EU. This targeted method of working and promoting mutual learning has proved very beneficial for all parties.

The policy instruments of the new streamlined strategy proposed in the Communication generally build on previous developments, aiming for effective policy-making.

The main reporting instrument is the National Strategy on Social Protection and Inclusion (NSSPIs) which will be developed once every 3 years thereby calling for more long-term strategic objectives and

integrated strategies, based on the common objectives of the three strands and the Guidance Note of the European Commission. FEANTSA members will make their expertise and tools available to local and national governments to develop integrated strategies to tackle homelessness with clear targets. The so-called “light” years (when NSSPIs are not submitted) will “concentrate on in-depth analyses of specific issues and on disseminating policy findings”. One or two societal problems could therefore be the focus of 2007, such as homelessness and employment.

The mutual learning instruments such as European networks, peer reviews, round tables, transnational projects are to continue under the new streamlined strategy under the PROGRESS budget line. It is unclear as yet how the three strands – social inclusion, health and pensions – will be divided between these instruments. For example, it is unclear if there will be a peer review programme for each strand, or rather a single peer review programme on social inclusion and social protection. Given that the Commission Communication clearly states (p.3) that the new streamlined strategy will not lead to a “weakening of the distinct nature and scope of the inclusion and pensions processes”, it can be assumed that adequate resources will be mobilised and maintained for each strand.

The evaluation instruments would be similar to the EU social inclusion strategy: the national evaluations of the Non-governmental expert network (researchers from 28 countries evaluating the NSSPIs), the annual Joint Social Protection and Social Inclusion Report (an analytical document on the content of the NSSPIs), the indicators of progress developed by the Social Protection Committee (on all areas covered under the streamlined strategy), the monitoring and evaluation of European networks representing different interests within the social protection and social inclusion field – like FEANTSA and its *shadow* peer reviews, *shadow* implementation report (see evaluations [here](#)).

3. A process with a clear framework for dialogue between the European Commission, Member States and representatives of civil society

The **3 overarching objectives** of the strategy on social protection and social inclusion (p.5) are the following:

- Promote social cohesion and equal opportunities for all through adequate, accessible, financially sustainable, adaptable and efficient social protection systems and social inclusion policies;
- Interact closely with the Lisbon objectives on achieving a greater economic growth and better jobs and with the EU’s Sustainable development strategy;
- Strengthen governance, transparency and the involvement of stakeholders in the design, implementation and monitoring of policy.

This last overarching objective on the involvement of stakeholders shows that all strands of the new strategy will require open processes of dialogue and consultation with civil society organisations for the development of policies on social protection and social inclusion. “For inclusion, the emphasis would be on promoting participation in decision-making, ensuring policy coordination between branches and levels of government and mainstreaming a concern with poverty and exclusion into national planning” (p.8). Indeed, social inclusion covers a wide range of areas (given its multidimensional nature) and it is crucial for the European Commission and the Social Protection Committee to consult all key players which have the resources and expertise to participate in policy development, monitoring and implementation.

Up until now, the main framework for interaction and consultation has been provided by the mutual learning instruments such as the peer reviews, the European conferences, the seminars of the European networks, the transnational projects. It is therefore crucial to maintain the momentum created by the EU social inclusion strategy by strengthening these instruments which allow for more interaction and, as a consequence, more specific policy development and implementation.

European networks like FEANTSA will naturally focus on cooperation and dialogue within the social inclusion strand of the new strategy, but will also **make links and encourage mainstreaming of social inclusion** in the other two strands on pension, and especially **health**. Health is particularly important in relation to homelessness (see Annual Theme 2006 of FEANTSA [here](#)) in light of :

- the barriers to accessing healthcare which currently exist for people who are homeless (see objective 1 of the health strand)
- the need to promote effective understanding and treatment of the sometimes complex and multiple nature of the health needs of people who are homeless (see objective 2 of the health strand)
- the need for good governance and coordination between care systems and different bodies working with people who are homeless (see objective 3 of the health strand).²

It is hoped therefore that consultations in the health and pensions strands will be open to social inclusion networks which have expertise and can be an added value.

European networks have been key players in the framework of the EU social inclusion strategy, and FEANTSA as representative of homeless service providers in 30 European countries (organisations which are directly involved in implementing national and local policies) is ready to take up its role as a key player in the new streamlined strategy.

Indeed, the focus on mutual learning and implementation of the new streamlined strategy will require **a different kind of cooperation** between Member States and stakeholders, especially for stakeholders representing service providers. Such cooperation will require involvement, consultation, but will also expect service providers to take up certain responsibilities to help Member States achieve sustainable results.

FEANTSA is ready for this challenge and currently acts as a facilitator of policy-making on homelessness by providing opportunities for transnational mutual learning between public, private and NGO bodies at European, national, regional and local level, and providing relevant expertise and information when needed.

On this basis, FEANTSA is planning to further promote and facilitate the functioning of a **European Forum to combat homelessness**, which will involve the wide spectrum of actors involved in the fight against homelessness such as public authorities (at all levels - from local to European), housing associations, health organisations, organisations working in the area of employment, universities, etc. The Forum would have as its principle aim to reduce the level of homelessness through the improvement of policy-making, which we hope to achieve mainly through transnational exchanges and comparison of policies.

4. A process **flexible** enough (based on soft law) to allow for feeding into other policy areas, and integrating the priorities of other policy areas in the streamlined process

Social protection and social inclusion are policy fields governed by the rules of the Open Method of Coordination, a process which provides enough flexibility to adapt the common objectives to emerging national priorities (see current revision of objectives and the decision of the EPSCO Council), but also enough flexibility to allow for taking into account initiatives developed in other policy areas and integrating social inclusion/protection concerns in other policy areas.

The Commission Communication on the new strategy underlines the need to link social protection and social inclusion with the Lisbon process, and particularly the Broad Economic Policy Guidelines and the European Employment Strategy (p.3). It also states clearly that *“policies within the revised Lisbon agenda will contribute to social cohesion and inclusion”* thus fostering close interaction between the social protection/inclusion and the revised Lisbon strategy.

² See FEANTSA position on the health strand [here](#).

The Social Protection Committee will be expected to work closely with the Employment Committee and the Economic Policy Committee. Similarly, FEANTSA can and will make the link with Lisbon **if given the proper framework** to develop cooperation with actors in the fields of employment and growth. We hope that the relevant European Commission departments will facilitate the consultation process to strengthen links between both processes.

FEANTSA will aim to further develop horizontal links between the homelessness/housing aspects of social inclusion and other policy areas such as:

- **freedom, security and justice** through research and policy development on **housing rights**
- **urban policy** through cooperation with the EU Urban Audit on collecting homelessness data
- **the services directive** by voicing the concern of our members regarding the liberalisation of all services, including services aimed at providing support for vulnerable groups (like people experiencing homelessness)

FEANTSA will indeed feed homelessness and housing concerns into other policy areas to the extent that this can help improve the quality of life, social protection and social inclusion of EU citizens experiencing homelessness.

5. The main focus on **implementation** of social inclusion policies

Implementation is the key to success of the new streamlined process. The European Commission Communication clearly states this by underlining the need for developing National Strategies with *“enhanced focus on being strategic, setting priorities and policy implementation.”* It was clear from all evaluations of the social inclusion strategy that an **implementation gap** was preventing the process from having a major impact on improving the quality of life of marginalised citizens in Europe.

The reasons for such an implementation gap in the area of homelessness have principally been the following:

- Lack of specific objectives calling for a strategy to tackle homelessness
- Few opportunities for comparison of policies given the vagueness of some national policies outlined in the NAPsIncl
- Weak participation of European networks (service providers, local authorities) as a consequence

In the new streamlined strategy, these three issues must be resolved, **and the key is in the targeted nature of the objectives**. If there are clear priorities, the NSSPIs will develop clear policies. If there are clear policies, there will be effective mutual learning based on comparison of targeted policies. If there are targeted policies, stakeholders (like service providers and local authorities) will wish to be more involved in the process.

The social inclusion strand of the new streamlined strategy does not propose targeted objectives, but rather relies on the Guidance Note of the European Commission to outline the priorities of the Member States. It is crucial for the Guidance Note to propose clear guidelines for priority areas, calling for strategies in these areas based on the 3 objectives of the social inclusion strand.

The implementation instruments are not clearly outlined in the Commission Communication. However, the third overarching objective of the strategy refers to the role of stakeholders in the implementation of policies in the future streamlined strategy:

“Strengthen governance, transparency and the involvement of stakeholders in the design, implementation and monitoring of policy.”

European networks are no longer **only** involved in design and monitoring, but are also expected to be involved in the implementation of the new streamlined strategy through **operational partnerships** with the European Commission and Member States. Such involvement of stakeholders in the process (like service providers, local authorities) can only increase the focus on policy implementation. Under the social inclusion strand at least, the seminars of the European Commission or the European

networks, for example, can focus more on implementation rather than awareness-raising given that the EU social inclusion strategy has already contributed greatly to increasing the visibility of societal problems like homelessness.

The first phase of the Social Inclusion OMC (2001-2005) has focused on launching the process - **consultation** and **awareness raising** have therefore been crucial - and has achieved significant results in the area of homelessness and housing exclusion. Now it is time to start the second phase - **implementation** - and show that the OMC can be a useful tool for policy development at all levels.

The FEANTSA Team
January 2006

Annex

ETHOS - European Typology on Homelessness and Housing Exclusion

Conceptual Category		Operational Category		Generic Definition	National Sub-Categories
ROOFLESS	1	People Living Rough	1.1	Rough Sleeping (no access to 24-hour accommodation) / No abode	
	2	People staying in a night shelter	2.1	Overnight shelter	
HOUSELESS	3	People in accommodation for the homeless	3.1	Homeless hostel	
			3.2	Temporary Accommodation	
	4	People in Women's Shelter	4.1	Women's shelter accommodation	
	5	People in accommodation for immigrants	5.1	Temporary accommodation / reception centres (asylum)	
			5.2	Migrant workers accommodation	
	6	People due to be released from institutions	6.1	Penal institutions	
			6.2	Medical institutions	
7	People receiving support (due to homelessness)	7.1	Residential care for homeless people		
		7.2	Supported accommodation		
		7.3	Transitional accommodation with support		
		7.4	Accommodation with support		
INSECURE	8	People living in insecure accommodation	8.1	Temporarily with family/friends	
			8.2	No legal (sub)tenancy	
			8.3	Illegal occupation of building	
			8.4	Illegal occupation of land	
9	People living under threat of eviction	9.1	Legal orders enforced (rented)		
		9.2	Re-possession orders (owned)		
10	People living under threat of violence	10.1	Police recorded incidents of domestic violence		
INADEQUATE	11	People living in temporary / non-standard structures	11.1	Mobile home / caravan	
			11.2	Non-standard building	
			11.3	Temporary structure	
	12	People living in unfit housing	12.1	Unfit for habitation (under national legislation; occupied)	
	13	People living in extreme overcrowding	13.1	Highest national norm of overcrowding	