



FEANTSA Evaluation of the Open Method of Coordination in the field of social protection

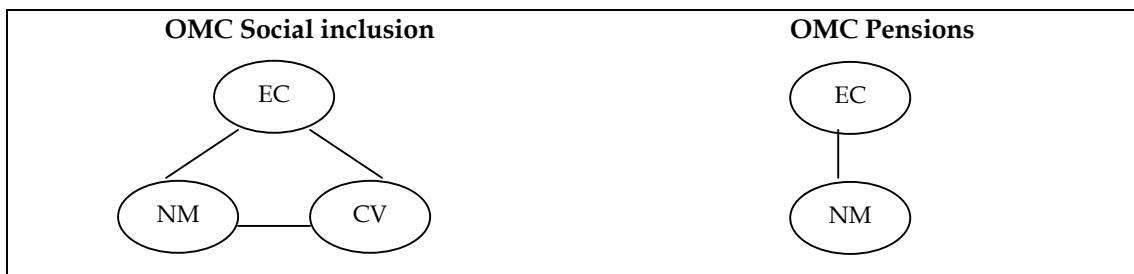
*OMC applied to homelessness:
Strong interest, great potential, and results guaranteed*

FEANTSA perspective on the Social Inclusion OMC

As one of the actors in the EU social inclusion process, FEANTSA¹ welcomes the European Commission's initiative to organise an open evaluation of the open method of coordination in preparation of the streamlined strategy on social protection and social inclusion.²

It is important to note that FEANTSA is providing feedback on the *Social Inclusion OMC* rather than the *Pensions OMC*. Although these two policy areas will become two strands of a single process under the new streamlined strategy, these OMCs are at present very different in nature in terms of actors and policy instruments.

The *actors* under the Social Inclusion OMC are clearly divided into three poles: European Commission (EC), National Ministries (NM), and Civil Society (CS). The Social Inclusion OMC is truly an *open* method of coordination since the European Commission and national ministries work with civil society organisations such as networks of service providers (like FEANTSA), service users, regional authorities, local authorities, and trade unions. In the Pensions OMC, there appears to be no structured participation of civil society groups and therefore it remains a fairly closed technocratic reporting process involving mainly civil servants and the European Commission.



The *policy instruments* used under both OMCs are different. Both OMCs have an overall political process consisting of regular reporting on national social inclusion/pensions policies through the National Action Plans (Social Inclusion) and the National Strategy Reports (Pensions). However, the social inclusion process is far more developed in this respect since it has clear forums for transnational exchange created under the Community Action Programme to combat poverty and social exclusion - namely the Peer Review Programme, the Round Table on Social Inclusion, the European networks - all of which allow for information exchange and specific policy development.

Our analysis will focus on two aspects of the OMC on Social Inclusion:

- The *process* - from a service providers' perspective
- The *content* - from a homelessness and housing exclusion perspective

¹ European Federation of national organisations working with the homeless - see www.FEANTSA.org

² See questionnaire in Annex 1

OMC Social Inclusion : The Process from a service providers perspective

FEANTSA is the main representative European network on homelessness and housing exclusion issues at EU level. It provides a voice for homeless service providers and housing associations in the EU political arena, and is regularly consulted by the European Commission in the framework of the EU social inclusion strategy for policy development on issues related to homelessness. FEANTSA provides expertise by carrying out research (see FEANTSA's European Observatory on Homelessness at www.feantsa.org), and by linking the work of FEANTSA members (more than 100 homeless service providers in 29 European countries) to European and national debates on homelessness.

Added value of the OMC - To what extent has the OMC helped to achieve progress in the national policy-making process and at European level?

The impact of the OMC in the area of social inclusion at national level is hard to determine since some countries' policy orientations had already started to change before the EU social inclusion strategy was established. Rather than a one-way impact of the EU level on national policy-making, it would be more accurate to refer to a multi-level interaction, given the wide range of stakeholders involved.

In the area of homelessness and housing exclusion, we have noted the potential of the OMC in helping to advance national agendas in the area of homelessness and housing exclusion. Some countries have no definitions of homelessness. Some countries have no clear integrated policies to tackle homelessness. The OMC is therefore a very timely process allowing for comparison of concrete policies and practices. Countries are benefiting much from transnational exchanges at service provider level within FEANTSA, and also at ministerial level through policy instruments like the **peer reviews**.

In 2004, the peer review programme enabled member states to examine a good practice in the area of homelessness: the England Rough Sleepers Strategy 1999-2002. This strategy was successful in many respects, namely in reducing the number of rough sleepers on the streets of England. This integrated approach to combating homelessness focusing on one sub-population of the homeless population (i.e. rough sleepers³) is currently being examined by other countries and in some cases being transferred to other countries (taking into account local needs and capacities). FEANTSA firmly believes in the added value of transnational exchange for policy development in the area of homelessness and severe housing exclusion.

Moreover, the OMC process has helped to raise awareness on the fact that homelessness is a common problem for all 25 EU member states: at their last meeting in March the Council of Ministers for Employment and Social Affairs acknowledged that "treatment of the phenomenon of homelessness" requires priority action in the area of social inclusion (see meeting [report](#)).

However, the OMC could have **an even greater impact** if certain elements are strengthened under the streamlined strategy. There is a need for a more targeted approach in the common objectives, focusing on specific priorities rather than general issues of housing, health, employment, etc. Up until now, there has been too much focus on procedures (structure of the NAPsIncl, consultations, etc) and too little focus on content (i.e. how to translate the objective into concrete action). An effective way of improving this is to apply the OMC tools and transnational exchanges to thematic priorities - namely the six priority actions outlined in the Council of Ministers report⁴- involving all relevant actors. European thematic networks

³ See [ETHOS](#) - European Typology on Homelessness and housing exclusion - for information on other categories suffering from homelessness

⁴ These are discussed in further detail below.

could be designated as facilitators of such *informal* OMCs in specific areas, using their expertise to support the European Commission in driving and monitoring exchanges on thematic priorities. It is important at this stage to make the streamlined strategy more output oriented, and use the potential of the European networks for policy development and implementation. As homeless service providers, FEANTSA members work closely with public authorities on policy development and implementation, and can therefore ensure follow-up of OMC outcomes.

The first phase of the Social Inclusion OMC has focused on launching the process - **consultation** and **awareness raising** have therefore been crucial - and has achieved significant results. 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.

Indicators and targets - Have indicators fulfilled their role in monitoring the progress achieved towards the common objectives? Have the targets proved to be both feasible and effective in driving forward more ambitious policy reform?

Each policy area covered under the social inclusion process (homelessness, child poverty, access to employment, etc) progresses at different paces and requires strengthening of different aspects (policy approaches, indicators, awareness-raising, etc). In the area of homelessness and housing exclusion, indicators and targets are clearly underdeveloped. This was recognised by the Social Protection Committee in their 2001 *Report on Indicators in the field of poverty and social exclusion* where it is clearly stated that they were unable to present a proposal for housing indicators, but agreed on the following common approach: "NAPsIncl should contain quantitative information covering three issues: (1) decent housing, (2) housing costs, (3) homelessness and other precarious housing conditions." However, indicators and targets in this area remain weak, as is reflected in the NAPsIncl and the latest Joint Social Protection and Social Inclusion Report (2005). Several countries do not even have a definition of homelessness. Most countries do not have any reliable figures on the number of homeless people, let alone targets set out in their NAPsIncl. Where figures do exist, the methodology for counting and monitoring trends differs from country to country, and therefore these figures lack comparability.

FEANTSA has therefore taken stock of the homelessness data collection in Europe over the past 3 years.⁵ We have now developed a European Typology on Homelessness and housing exclusion ([ETHOS](#))⁶ which defines who is homeless in Europe, and shows what sort of data should be collected. ETHOS is an example of a concrete contribution of service providers to the advancement of the OMC process in this specific area of policy, and demonstrates just how important it is to have social and political deliberation when elaborating indicators.

In conclusion, indicators and targets have been lacking in the case of homeless policies, and therefore have not contributed in any way to driving reforms in different member states. The driving force is to be found elsewhere (such as the direct involvement of service providers in the process through FEANTSA, or the awareness raised in the framework of the different policy instruments). This would deserve a more in-depth analysis.

⁵ See Review on Homelessness Statistics [2002](#), [2003](#) and [2004](#)

⁶ This is a housing-based typology. So the people in this typology suffer from a form of **housing** exclusion. As for insecure and inadequate housing: not all people in these categories are homeless, but some people under these categories can sometimes be homeless (for example, living in a garden shed is not necessarily better than living in a homeless shelter).

Mobilisation of all actors - Has the OMC on the national level been implemented effectively and in a way conducive to better coordination between different government departments and levels, and to a greater mobilisation of stakeholders?

The regular consultation and inclusion of civil society in the different policy instruments of the OMC process means there is greater mobilisation and awareness in the current EU social inclusion strategy than in the other OMCs (European Employment Strategy, Pensions, BEPGs, etc), and should serve as a model for all OMCs including the forthcoming streamlined OMC on social protection and social inclusion. FEANTSA agrees with the general need “to simplify and streamline Lisbon”.⁷ Simplifying and streamlining Lisbon also means clarifying the roles of the different actors, also as a means of consolidating the social dimension of Lisbon. This OMC evaluation should therefore be used to clarify the role of the current actors in the process: national ministries, European networks, and the European Commission. Furthermore, it is crucial at this stage to set up appropriate structures for the participation of parliaments, both European and national.

National Ministries

As well as regularly reporting on national social inclusion policies in the NAPsIncl, the national ministries have a steering role through intergovernmental committees, composed of national civil servants, which regularly convene in Brussels such as the Social Protection Committee, the Programme Committee, the Indicators Sub-Group. The presence of experts on these committees naturally reinforces the potential for mutual learning and transferability of practices. The civil servants however recognise that social inclusion covers a very wide range of policy areas (from homelessness, immigration, disability, health, employment, etc) and therefore they use the expertise of other bodies such as the European networks. The future streamlined strategy will cover *three* different areas: social inclusion, pensions and health. In this context, it will be even more important to strengthen the expertise of the European thematic networks (namely those focusing on homelessness, social housing, child poverty, age, disability, etc) in order to ensure the quality of the streamlined OMC process is maintained.

European networks

There are a number of European networks which support the work of the European Commission and the intergovernmental committees, such as FEANTSA in the area of homelessness and housing exclusion. As a European thematic NGO developing expertise in the area of homelessness and housing exclusion, FEANTSA involves its national members in the NAPsIncl preparation, in the peer reviews, in the Round Table on Social Inclusion, in international seminars on homelessness.⁸ Many different actors are involved in the framework of these policy instruments, including representatives from the national ministries, from research institutes, and from local authorities from all 25 EU member states. FEANTSA has in fact been working as *facilitator* of the OMC in the area of homelessness and housing exclusion. This evaluation is a good opportunity to officialise the role of FEANTSA as facilitator of the OMC in the area of homelessness. Concretely FEANTSA could be responsible for organising peer reviews in the area of homelessness, workshops on homelessness in major conferences, etc. The national member organisations of FEANTSA – all homeless service providers – can not only provide real expertise, but also ensure follow-up and implementation of EU objectives at local level.

⁷ See President Barroso’s Communication on the new Lisbon strategy

⁸ See upcoming seminar in the European Parliament aiming to provide a political arena for exchange of information between national parliaments in the area of homelessness and housing exclusion.

European Commission

The European Commission should continue to take up and strengthen its role as evaluator of the EU social inclusion strategy, namely through regular monitoring and evaluation of the individual NAPsIncl. Given its central place in the Community machinery, the European Commission is the only body which can objectively take up this role. It should have responsibilities in two respects.

Firstly, it should take up a monitoring role by measuring progress towards agreed objectives using agreed monitoring tools like common indicators and targets. In the absence of legal constraints, this is crucial to measure progress and implementation.

Secondly, it should provide systematic evaluations of the effectiveness of policies covered in the field of social inclusion, looking at what aspects of the policies need strengthening (e.g. indicators and targets for homelessness), and formulating recommendations to individual member states in areas where they are under-performing. This should be carried out in close consultation with expert bodies such as the European thematic networks.

Parliaments: European and national

Both the European Parliament and national parliaments have been formally absent from the process since the OMC is intergovernmental in nature (although in practice the European Parliament has tried to get involved). The European parliament has been marginally linked to employment and economic policy. The EU social inclusion strategy, however, has been managed and prepared outside any real democratic process. It is crucial at this stage to set up structures for their participation in the future streamlined strategy in order to improve the legitimacy and effectiveness of the OMC. There are different ways of involving Parliaments in the process.

The European Parliament could debate specific policy issues in the relevant parliamentary Committees and Intergroups (for areas where no parliamentary committees exist - see recently set up Intergroup on housing and urban issues) and review progress of member states towards the common objectives.

Efforts to democratise the OMC should also focus on national parliaments. This can be done with systematic parliamentary debates on the NAPsIncl before the annual Spring European Council. The European thematic networks can also contribute to increasing participation of parliaments by creating forums of debate and information exchange.

Working methods - Have the working methods developed at European level to promote mutual learning and discuss results of the open method of coordination been the most appropriate and effectively managed?

The OMC is a soft policy-making method with much potential. It works on two levels. The first level is the main political process of coordination of social inclusion policies based on the submission of National Action Plans on social inclusion (NAPsIncl). The second level are the different policy instruments under the Community Action Programme to combat poverty and social exclusion which provide more scope for analysis of the NAPsIncl and specific policy development. This includes the peer review process, the European Round Table on Social Inclusion, the transnational exchange projects, and the forums for exchange created by European networks.

On the first level, each EU country prepares a NAPIncl every two years (which should include policies aimed at achieving the common objectives, including policies to tackle homelessness, and this NAPIncl is submitted to the European Commission. In some countries, the preparation of the NAPsIncl has involved all relevant stakeholders including homeless service providers - often members of FEANTSA. The quality of the consultation varies much from country to country. Despite consultation of national service providers, not all NAPsIncl contain integrated policy measures for preventing homelessness, helping the most vulnerable, and promoting access to housing. In countries where the NAPsIncl have very weak sections on homelessness and housing exclusion, the NAPsIncl exercise becomes

irrelevant for service providers and does not encourage them to use the tools provided by the OMC.

On the second level, the working methods are far more varied and of greater interest to FEANTSA. Examples of policy tools which have proved very effective for improving knowledge and policies in the area of homelessness are the peer reviews, the European Round Table on Social Inclusion, and to some extent also the transnational exchanges.

The Peer review programme is an important framework to examine policies which are poorly covered in the NAPsIncl (as has often been the case for homelessness policies up until now). The countries which *have* outlined successful policies to combat homelessness and housing exclusion put forward their national practice for evaluation in the peer review programme. The review of the practice by peer countries, by the European Commission, by national experts, and by European experts (including European NGOs) provides scope for information exchange on concrete policies in specific policy areas under social inclusion e.g. homelessness, immigration, child poverty, etc). The openness of the peer review programme enables various actors to contribute their perspective to the debate including service providers, local authorities, service users, etc., and allows for concrete follow-up on any potential policy transfers.

The annual European Round Table on Social Inclusion aims to take stock of progress towards the common objectives, but lacks visibility which inevitably weakens the impact of the Round Table outcome. Nevertheless, this event brings together many relevant stakeholders and therefore has potential for awareness-raising on different issues and raising the visibility of urgent issues which require priority action – as was the case for homelessness at the Rotterdam Round Table in 2004. This event provides yet another framework for stakeholders to feed their expertise in the policy-making process.

Transnational exchanges are managed independently through micro-projects financed by the European Commission, and are also managed in a more structured and systematic way within European networks. There are thematic European networks focusing on specific issues (like FEANTSA and Eurochild) and more general networks which represent the interests of the social sector focusing on awareness raising campaigns. Each network has a specific role to play. FEANTSA works on homelessness and housing exclusion and therefore organises regular exchanges and evaluations between members in this area (see for example [Shadow Peer Review 2004](#)).

OMC Social Inclusion: The Content from a homelessness perspective

The EU social inclusion strategy covers a wide range of policy areas including housing, health, and employment. Homelessness and housing exclusion are priority issues which need to be addressed under each area given its multi-dimensional nature. For each priority issues, there are different actors, different weaknesses and different levels of progress. FEANTSA has been working with the European Commission, national ministries and European networks to improve specific policy development on homelessness and housing exclusion.

The Common Objectives

The 4 common objectives⁹ of the EU social inclusion strategy are the following:

1. To facilitate participation in employment and access by all to resources, rights, goods and services
2. To prevent the risks of exclusion
3. To help the most vulnerable
4. To mobilise all relevant bodies

These objectives address priority issues but only in quite vague terms. The sub-objectives more clearly address priority issues such as homelessness and housing exclusion. Objective 1 refers to the need to implement policies aiming to provide access for all to decent and sanitary housing. Objective 2 refers to the need to prevent homelessness. Objective 3 refers to the need to help the most vulnerable – as the most excluded of excluded groups, the homeless are targeted specifically. However, none of these objectives include *concrete policy approaches* for tackling each issue. This may be one of the reasons why the policies of the NAPsIncl often remain vague. The objectives should therefore be strengthened by the integration of recommendations on policy approaches based on commonly accepted principles. In the case of homelessness, FEANTSA would suggest a general policy approach which can be adapted to each national context: all member states should develop and implement an integrated strategy to prevent and tackle homelessness.

As mentioned above, an effective way of improving the content of the Social Inclusion OMC would be to focus on thematic priorities agreed on by the Council of Ministers at their last meeting:

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

Existing European networks working on these specific issues can work together with the European Commission and member states in order to facilitate transnational exchanges on these specific issues, allowing for concrete policy proposals and concrete outcomes.

Homelessness under the future streamlined strategy

The objectives of the social inclusion pillar of the streamlined strategy will be adapted and modified to reflect the priority issues in the Enlarged EU. The need for a clear and specific objective encouraging all EU member states to develop integrated strategies to prevent and tackle homelessness is necessary for a number of reasons.

⁹ See Annex 1 for full outline of the Common Objectives

Firstly, experience from the EU social inclusion strategy shows that if the objectives remain vague without any concrete proposals, the member states will not necessarily develop specific policies in this area within their NAPsIncl.

Secondly, homelessness is a phenomenon which has to be treated on different levels. With the current structure of common objectives, the NAPsIncl need to include policies under different objectives in order to tackle the different root causes of homelessness in an effective way. It is now time to recognise that homelessness is a horizontal issue linked to various areas including housing, employment, health, and social care, which requires a specific objective with a strategy focusing on these different aspects.

Thirdly, the new objectives need to be adapted to emerging priorities in the Member States. "The treatment of the phenomenon of homelessness" is amongst these priority issues (see decision of the Council of Ministers last month). The flexibility of the OMC is an advantage in this respect since the objectives can be modified in accordance with evolving situations/problems, and target areas where Europe is performing less well. Homelessness is a concrete example. With EU enlargement homelessness has become an increasingly important issue for EU Member States.

Fourthly, a specific and targeted objective focusing on homelessness will allow for more concrete policy proposals and more effective policy comparisons. Such targeted objectives for homelessness and other issues will also increase the relevance of the OMC process for local actors and consequently increase the visibility of the process.

Fifthly, many EU member states are eager to tackle the phenomenon of homelessness. In this political context, the OMC can be a very useful tool and a clear objective on homelessness would therefore allow member states to use the EU policy instruments of the OMC in an effective way and allow for successful information exchange on relevant policies and practices.

The links between the Social Inclusion OMC and other processes

There is a natural link between the Social Inclusion OMC and other OMC processes, since social exclusion is a horizontal issue related to a number of factors including lack of housing, lack of employment, bad health, etc. Areas covered under the Social Inclusion OMC, such as employment and health, therefore have their own separate OMC processes¹⁰. The relation between these OMC processes could however be improved.

Health and employment issues should remain under the Social Inclusion OMC insofar as they relate to social exclusion – solutions or policy measures in these areas can be developed under social inclusion, but then should be integrated in the guidelines of the other official OMCs in the area of health and employment.

Social inclusion is different to the other OMC areas since it tackles a real and urgent societal problem. Therefore social inclusion issues should be integrated into other OMCs rather than the other way round.

¹⁰ It is interesting to note that OMC processes exist for all "sensitive" policy areas - like social inclusion, health, pensions, employment, environment, information society - **except for housing**. Yet housing is an increasingly important issue for all EU member states not only from a housing exclusion perspective, but also from the point of view of housing economics, social housing, urban and city development, etc.

Further development of the OMC in a streamlined context: FEANTSA recommendations

FEANTSA would like to make some concrete recommendations for the future streamlined strategy:

- 1. Elaborate a common objective on homelessness: "To develop and implement an integrated strategy to prevent and combat homelessness"*
- 2. Ensure that the new streamlined strategy on social protection mobilises the participation of a wide range of actors in the field of social inclusion in order to make the OMC a truly useful tool (based on the successful current social inclusion model)*
- 3. Offer a wide range of policy instruments in order to maximise the use, analysis, and implementation of the NAPsIncl*
- 4. Clarify the role of European NGOs as facilitators in specific thematic areas*
- 5. Create structures for strengthening the involvement of parliaments in policy development within the framework of the OMC*

FEANTSA
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QUESTIONNAIRE

1. The added value of the OMC

To what extent has the OMC helped to achieve progress in the national policy making process and at European level?

2. The Common objectives

Are the common objectives still in line with key policy priorities and do they still address the most important challenges as identified in the most recent Joint Reports?

3. Indicators and targets

Have indicators fulfilled their role in monitoring the progress achieved towards the common objectives?
Have targets proved to be both feasible and effective in driving forward more ambitious policy reform?

4. Mobilisation of all actors and co-operation at national level

Has the OMC, on the national level been implemented effectively and in a way conducive to better coordination between different government departments and levels, and to greater mobilisation of stakeholders?

5. Working methods at European level

Have the working methods developed at European level to promote mutual learning and to discuss results of the open method of coordination been the most appropriate and effectively managed?

6. The links between the OMC and other processes

How do you assess the interaction between the OMC in the field of social inclusion and pensions and other relevant coordination processes on the EU level?

7. Future development of the OMC in a streamlined context

What suggestions would you make for the future development of the open method of coordination in the field of social protection and social inclusion?

EU OBJECTIVES IN THE FIGHT AGAINST POVERTY AND SOCIAL EXCLUSION

1. To facilitate participation in employment and access by all to resources, rights, goods and services

1.1. Facilitating participation in employment

In the context of the European employment strategy, and the implementation of the guidelines in particular:

(a) To promote access to stable and quality employment for all women and men who are capable of working, in particular:

- by putting in place, for those in the most vulnerable groups in society, pathways towards employment and by mobilising training policies to that end;
- by developing policies to promote the reconciliation of work and family life, including the issue of child- and dependent care;
- by using the opportunities for integration and employment provided by the social economy.

(b) To prevent the exclusion of people from the world of work by improving employability, through human resource management, organisation of work and life-long learning.

1.2. Facilitating access to resources, rights, goods and services for all

(a) To organise social protection systems in such a way that they help, in particular, to:

- guarantee that everyone has the resources necessary to live in accordance with human dignity;
- overcome obstacles to employment by ensuring that the take-up of employment results in increased income and by promoting employability.

(b) To implement policies which aim to provide access for all to decent and sanitary housing, as well as the basic services necessary to live normally having regard to local circumstances (electricity, water, heating etc.).

(c) To put in place policies which aim to provide access for all to healthcare appropriate to their situation, including situations of dependency.

(d) To develop, for the benefit of people at risk of exclusion, services and accompanying measures which will allow them effective access to education, justice and other public and private services, such as culture, sport and leisure.

2. To prevent the risks of exclusion

(a) To exploit fully the potential of the knowledge-based society and of new information and communication technologies and ensure that no-one is excluded, taking particular account of the needs of people with disabilities.

(b) To put in place policies which seek to prevent life crises which can lead to situations of social exclusion, such as indebtedness, exclusion from school and becoming homeless.

(c) To implement action to preserve family solidarity in all its forms.

3. To help the most vulnerable

(a) To promote the social integration of women and men at risk of facing persistent poverty, for example because they have a disability or belong to a group experiencing particular integration problems such as those affecting immigrants.

(b) To move towards the elimination of social exclusion among children and give them every opportunity for social integration.

(c) To develop comprehensive actions in favour of areas marked by exclusion.

These objectives may be pursued by incorporating them in all the other objectives and/or through specific policies or actions.

4. To mobilise all relevant bodies

(a) To promote, according to national practice, the participation and self-expression of people suffering exclusion, in particular in regard to their situation and the policies and measures affecting them.

(b) To mainstream the fight against exclusion into overall policy, in particular:

- by mobilising the public authorities at national, regional and local level, according to their respective areas of competence;
- by developing appropriate coordination procedures and structures;
- by adapting administrative and social services to the needs of people suffering exclusion and ensuring that front-line staff are sensitive to these needs.

(c) To promote dialogue and partnership between all relevant bodies, public and private, for example:

- by involving the social partners, NGOs and social service providers, according to their respective areas of competence, in the fight against the various forms of exclusion;
 - by encouraging the social responsibility and active engagement of all citizens in the fight against social exclusion;
 - by fostering the social responsibility of business.
-