

To: Ms Jutta Steinruck, Rapporteur on the proposal for a regulation on a European Union Programme for Social Change and Innovation

April 5, 2012

Re: Social Platform's recommended amendments for a solid financial regulation committing the EU to strengthen social protection, social inclusion and the fight against poverty during 2014-2020

Dear Ms Steinruck,

We would like to thank you for your report on the European Commission proposal for the European Union Programme for Social Change and Innovation. We would particularly like to thank you for taking on board many of the proposals supported by Social Platform and its members and addressing many of their areas of concern.

We would also like to present you with some comments on your appreciated draft report and suggestions for amendments, which include:

1. Set a specific priority for promoting social protection and inclusion, and fighting poverty, separated from the priority on employment

Why?

116 million people in the EU are at risk of social exclusion and poverty: some may never enter employment; some need targeted, specific support to enter employment (active inclusion); levels of working poor are increasing and employment cannot provide, in many cases, the most adequate solutions to combating poverty and social exclusion. For the excluded and vulnerable groups, increasing their participation in society and reducing exclusion are often a prerequisite for employment.

Other EU strategies and programmes recognise the need to separate employment and social inclusion:

■ **The Europe 2020 strategy:**

- Requires that at least 20 million are lifted out of poverty by 2020
- Foresees separate objectives on employment and social inclusion

■ **The ESF identifies "social inclusion and combating poverty" as one of its four thematic objectives and has an earmarking of 20% of the fund**

- active inclusion is distinguished from employment policy.

How?

- Refer in particular to our proposals for amendments from 1 to 4.

2. Keep the original proposal from the Commission to allocate 60% of the total amount of the programme to the Progress axis:

Why?

We consider that the original proposal from the Commission more adequately reflects the real need for support.

If the increase of the total amount of the programme proposed by you is not accepted, while the proposed percentages of allocations to the three axes are kept, this would result in a decrease of the budget for the Progress axis.

How?

- Refer in particular to our proposal for amendment no. 5.

3. Include civil society organisations as full partners, together with social partners and public authorities, in the preparation, implementation, monitoring and evaluation of the programme (partnership principle)

Why?

We call for the recognition of civil society organisations as full partners, in the preparation, implementation, monitoring and evaluation of programmes, in order to make an added value of their sound knowledge of the reality on the ground, the needs of different target groups, on how to successfully run integrated projects funded by EU Funds and the key role played by previous programmes such as Progress and other EU funds in the fight against poverty and social exclusion and in delivering on the poverty reduction target.

In the text there are some inconsistencies; our proposals aim at ensuring coherence throughout the whole regulation and with the provision on a partnership contract of the proposal for a regulation laying down common provisions on structural funds (art. 5).

How?

- Refer in particular to our proposals for amendments from 6 to 10.

4. We propose some changes in the definitions proposed by you on “social innovation” and “social policy experimentation”:

Why?

Social innovations should prove to be effective before they can be scaled-up. However, evidence of effectiveness cannot be a pre-condition for innovation.

If all social innovations have to be “evidence based” as a pre-requisite, the risk is that some social innovations cannot be considered as such, simply because they do not have enough financial means or other resources to assess that they comply with this requirement. It could also be understood that all social innovations must prove that they are evidence based by the means of social policy experimentations, while evidence based can be proved in other ways, for instance by available statistics and research, evaluation of the impact on beneficiaries, etc.

Social policy experimentation should be developed with the direct involvement of stakeholders and beneficiaries and should lead to the long-term and sustainable financing to ensure the scaling-up of effective approaches. Long-term financing of pilot projects is not the goal of social innovation or the programme. Pilot projects serve to test an innovation and should by definition be limited in duration. If testing shows an innovation that proves to be effective, then adequate financing needs to be provided to implement scaling up. Scaling up will require links to other financial instruments such as ESF and ERDF.

How?

- Refer in particular to our proposals for amendments no. 11 and 12.

We trust that you will give these issues your utmost attention.

Yours sincerely,



Conny Reuter

President



Pierre Baussand

Director

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Social Platform is the largest civil society alliance fighting for social justice and participatory democracy in Europe. Consisting of 45 pan-European networks of NGOs, We campaign to ensure that EU policies are developed in partnership with the people they affect, respecting fundamental rights, promoting solidarity and improving lives.

Social Platform proposal of amendments on the

Committee on Employment and Social Affairs draft report on the EU Program for Social Change and Innovation

Key messages and related proposed amendments on the Committee on Employment and Social Affairs draft report

1) A specific priority for promoting social protection, social inclusion, and the fight against poverty, separate from the priority on employment

Social Platform proposal for amendment 1	
Amendment 1 – Draft report - Title	
Amendment 2 – Draft report Title	
Text proposed by rapporteur Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on a European Union Programme for Social <i>Progress</i> and <i>Employment and amending Decision No 283/2010/EU</i>	Text proposed by Social Platform Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on a European Union Programme for Social Progress and <i>Innovation</i> and amending Decision No 283/2010/EU

Justification for this proposal:

We are concerned that the proposed change in the title of the programme would suggest that its main focus is employment.

116 million people in the EU are at risk of social exclusion and poverty: some may never enter employment; some need targeted, specific support to enter employment (active inclusion); levels of working poor are increasing and employment cannot provide, in many cases, the most adequate solutions to combating poverty and social exclusion.

Therefore employment alone does not have to be the only answer to the fight against poverty and social exclusion.

Other EU strategies and programmes recognise the need to separate employment and social inclusion:

- **The Europe 2020 strategy:**
 - Requires that at least 20 million are lifted out of poverty by 2020
 - Foresees separate objectives on employment and social inclusion
- **The ESF identifies “social inclusion and combating poverty” as one of its four thematic objectives and has an earmarking of 20% of the fund**
 - active inclusion is distinguished from employment policy.

Social Platform proposal for amendment 2	
Amendment 39 – article 4 – paragraph 1 – point e a (new)	
Text proposed by rapporteur (ea) Combat poverty and social exclusion by supporting the activities of social partners, non-	Text proposed by Social Platform (ea) Combat poverty and social exclusion by supporting the activities of social

governmental organisations, social enterprises and public bodies with particular focus on social innovation and social policy experimentation;	partners, non-governmental organisations, social enterprises and social economy organisations , and public bodies with particular focus on social innovation and social policy experimentation ;
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Justification for this proposal:

We welcome that a specific priority on combating poverty and social exclusion has been included by the rapporteur in the general objectives of the programme. However, it is important to continue the support of the activities aimed at ongoing processes that fight against poverty and social inclusion which are carried out through the European Platform against Poverty and Social Exclusion and the Social OMC and do not fall under social policy experimentation and social innovation. Furthermore, we consider that the programme should also support social economy organisations that cannot be considered social enterprises.

Social Platform proposal for amendment 3 Amendment 76 – article 14 a (new)	
<p>Text proposed by rapporteur</p> <p>The Progress axis shall include the following thematic sections:</p> <ul style="list-style-type: none"> a) Employment; b) Social protection, social inclusion and the reduction and prevention of poverty; c) Working conditions; d) Social policy experimentation, as a cross-cutting section. 	<p>Text proposed by Social Platform</p> <p>The Progress axis shall include should support actions in one or more of the following thematic sections:</p> <ul style="list-style-type: none"> a) Employment; b) Social protection, social inclusion and the reduction and prevention of poverty; c) Working conditions; d) Social policy experimentation, as a cross-cutting section.

Justification for this proposal:

Working towards social inclusion and promoting employment, especially among the excluded and vulnerable groups requires flexible approach tailor-made to specific needs. Formulating the specific objectives of the Progress axis of the EUPSCI in such way that they are always in conjunction with employment may lead to over-focus on entrance to the labour market. Yet certain groups may not immediately be ready to benefit from such interventions or they may not be able to maintain employment obtained as a result of such intervention. Instead, for the excluded and vulnerable groups, community-based interventions that increase their participation in the society and reduce exclusion are often a prerequisite for employment. The current PROGRESS programme allows for this flexibility through maintaining separate thematic lines for employment, social protection and inclusion, and working conditions. It is therefore recommended to formulate specific objectives in such way that the issues of social inclusion and poverty reduction can be pursued as a priority in circumstances that require this.

Social Platform proposal for amendment 4 Amendment 77 – article 15 – paragraph 1	
Text proposed by Commission	Text proposed by Social Platform

<p>In addition to the general objectives set out in Article 4, the specific objectives of the Progress axis shall be to: ...</p>	<p>In addition to the general objectives set out in Article 4, the specific objectives of the Progress axis shall be to support the implementation of the Europe 2020 strategy, the European Platform Against Poverty and other relevant Flagships Initiatives and the engagement in the reinforced social OMC. The specific objectives shall: ...</p>
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Justification for this proposal:

Adding a specific reference to the targets of the Europe 2020 strategy, the relevant Flagship Initiatives and the social OMC, gives focus to the spending of the EUPSCI funds that is currently absent from the wording of the specific objectives of the Progress axis. In the current proposal it is not clarified what policy development aim it should pursue. The amendment specifies the directionality of changes, so that the policy development promotes social cohesion in line with and in order to reach the targets of the EUROPE 2020 strategy.

The seven Flagship Initiatives of the Europe 2020 strategy support achieving its objectives at EU level. The Progress programme finances a number of European stakeholders who work in the context of the flagship initiative European Platform against Poverty and Social Exclusion as well as the Social OMC as a stakeholder engagement mechanism. Mentioning this link would reinforce work on the Europe 2020 poverty target and the stakeholder involvement within the strategy.

Progress programme has been developed to specifically support stakeholder engagement with the European strategies against poverty and social exclusion within the framework of the Social Open Method of Coordination. It is also important to keep a reference to the OMC in the new programme, as it remains a key mechanism for advancing future work in this area and for ensuring stakeholder engagement in this coordination framework, including on the development of social reports.

2) Earmarking for the Progress axis:

<p style="text-align: center;">Social Platform proposal for amendment 5 Amendment 46 – article 5 – paragraph 2 – subparagraph 1 – point a</p>	
<p>Text proposed by rapporteur</p> <p>(a) 56% to the Progress axis, of which at least 50% shall be allocated to social protection, social inclusion and the reduction and prevention of poverty and at least 10% to fighting youth unemployment; at least 25% of the budget for this axis shall be allocated to promoting social policy experimentation; funding shall be made available to small, medium-sized and large projects alike;</p>	<p>Text proposed by Social Platform</p> <p>(a) 60% to the Progress axis, of which at least 50% shall be allocated to social protection, social inclusion and the reduction and prevention of poverty and at least 10% to fighting youth unemployment; at least 25% of the budget for this axis shall be allocated to promoting social policy experimentation; funding shall be made available to small, medium-sized and large projects alike;</p>

Justification for this proposal:

We consider that the original proposal from the Commission to allocate 60% to the Progress axis more adequately reflects the real need for support. We are concerned that the increase of the total amount of the programme proposed by the rapporteur is not accepted, while the proposed percentages of

allocations to the three axes are kept. If this happens, this would result in a decrease of the budget for the Progress axis.

We consider that the earmarking proposed for the thematic sections of the Progress axis (amendment 76) could be problematic, because it is not coherent with and reflected in the specific objectives of the axis and this would require a complete rewriting of the objectives of the whole programme and each of the axes specifically.

3) Include civil society organisations as full partners in the preparation, implementation, monitoring and evaluation of the programme (partnership principle)

Social Platform proposal for amendment 6 Amendment 7 - Recital 9	
<p>Text proposed by rapporteur</p> <p><i>Social partners play a key role in promoting quality employment and combating social exclusion and poverty as well as in fighting the crisis, and should be closely associated in all actions designed to meet the objectives of the Programme.</i> Civil society organisations active at various levels <i>should also be able to</i> play <i>their</i> important role in meeting the objectives of the Programme. <i>Therefore, social partners and civil society organisations should participate in the development, evaluation, field testing and dissemination of new policies. High-quality partnerships should be forged at all political levels. The partnership principle should be strengthened and extended as the guiding principle to all sections of the Programme.</i></p>	<p>Text proposed by Social Platform</p> <p>Social partners <i>and civil society organisations</i> play a key role in promoting quality employment and combating social exclusion and poverty as well as in fighting the crisis, and should be closely associated in all actions designed to meet the objectives of the Programme. Civil society organisations active at various levels should also be able to play their important role in meeting the objectives of the Programme. Therefore, social partners and civil society organisations should participate in the development, evaluation, field testing and dissemination of new policies. High-quality partnerships should be forged at all political levels. The partnership principle should be strengthened and extended as the guiding principle to all sections of the Programme.</p>

Justification for this proposal:

The text proposed in amendment 7 is in contradiction with the one proposed in amendment 44 on a partnership principle (in art. 4). Social Platform supports the wording of amendment 44.

To ensure coherence in the text throughout the whole regulation and with the provision of the proposal for a regulation laying down common provisions on structural funds (art. 5), we call for the recognition of civil society organisations as full partners, together with social partners and public authorities, in the preparation, implementation, monitoring and evaluation of programmes.

Social Platform proposal for amendment 7 Amendment 31 – article 3 – paragraph 1 – point a	
<p>Text proposed by rapporteur</p> <p>(a) The Progress axis, which shall support the development, implementation, monitoring and</p>	<p>Text proposed by Social Platform</p> <p>(a) The Progress axis, which shall support the development, implementation,</p>

<p>evaluation of Union policy in the fields of employment, working conditions, social protection, social inclusion and combating poverty as well as legislation in those areas and shall promote evidence-based policy-making and social progress, in partnership with the social partners and in cooperation with civil society organisations and public bodies;</p>	<p>monitoring and evaluation of Union policy in the fields of employment, working conditions, social protection, social inclusion and combating poverty as well as legislation in those areas and shall promote evidence-based policy-making and social progress, in partnership with the social partners, and in cooperation with civil society organisations and public bodies;</p>
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Social Platform proposal for amendment 8 Amendment 61 – article 6 – paragraph 1 – point 3 – point b a (new)	
<p>Text proposed by rapporteur</p> <p>(ba) Capacity-building of social partner organisations;</p>	<p>Text proposed by Social Platform</p> <p>(ba) Capacity-building of social partner and civil society organisations;</p>

Social Platform proposal for amendment 9 Amendment 66 – article 8 – paragraph 1	
<p>Text proposed by rapporteur</p> <p>1. The Commission, in cooperation with the Member States, shall ensure that activities carried out under the Programme are consistent with, and complementary to other Union action, in particular under the European Social Fund (ESF), the European Regional Development Fund (ERDF), the Horizon 2020 programme for research and innovation, the Programme for the Competitiveness of Enterprises and small and medium-sized enterprises, as well as with regard to the application of the partnership principle and the involvement of the social partners.</p>	<p>Text proposed by Social Platform</p> <p>1. The Commission, in cooperation with the Member States, shall ensure that activities carried out under the Programme are consistent with, and complementary to other Union action, in particular under the European Social Fund (ESF), the European Regional Development Fund (ERDF), the Horizon 2020 programme for research and innovation, the Programme for the Competitiveness of Enterprises and small and medium-sized enterprises, as well as with regard to the application of the partnership principle and the involvement of the social partners.</p>

Social Platform proposal for amendment 10 Amendment 78 – article 15 – paragraph 1 – point b	
<p>Text proposed by rapporteur</p> <p>(b) Facilitate effective and inclusive information-sharing, mutual learning and dialogue, within the</p>	<p>Text proposed by Social Platform</p> <p>(b) Facilitate effective and inclusive information-sharing, mutual learning and</p>

<p>framework of the European Employment Strategy and the Open Method of Coordination in the field of social protection and inclusion and by networking amongst specialised bodies, including the social partners, on Union policy in the fields of employment, working conditions, social protection, social inclusion and combating poverty as well as legislation in those areas at Union, national and international level in order to assist the Member States and the other participating countries in developing their policies and in implementing Union law;</p>	<p>dialogue, within the framework of the European Employment Strategy and the Open Method of Coordination in the field of social protection and inclusion and by networking amongst specialised bodies, including the social partners and civil society organisations, on Union policy in the fields of employment, working conditions, social protection, social inclusion and combating poverty as well as legislation in those areas at Union, national and international level in order to assist the Member States and the other participating countries in developing their policies and in implementing Union law;</p>
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4) Definitions of „social innovation“ and „social policy experimentation“

<p style="text-align: center;">Social Platform proposal for amendment 11 Amendment 29 – article 2 – paragraph 1- point d a (new)</p>	
<p>Text proposed by rapporteur</p>	<p>Text proposed by Social Platform</p>
<p>(d a) 'Social innovation' means new interventions that are social both in their ends and their means and provide more effective, efficient, sustainable and/or just responses to social needs that are unmet or insufficiently met in terms of combating poverty and social exclusion, promoting a high level of quality employment and decent work, guaranteeing adequate and poverty preventing social protection, and improving working conditions, thereby contributing to social progress.</p> <p>Social innovation shall be evidence based and shall improve the quality of life and work. It shall not be judged primarily on the basis of economic criteria but, rather, on the basis of its added value for society as a whole.</p>	<p>(d a) 'Social innovation' means new interventions that are social both in their ends and their means and provide more effective, efficient, sustainable and/or just responses to social needs that are unmet or insufficiently met in terms of combating poverty and social exclusion, promoting a high level of quality employment and decent work, guaranteeing adequate and poverty preventing social protection, and improving working conditions, thereby contributing to social progress.</p> <p>Social innovation shall be evidence based and shall improve the quality of life and work. It shall not be judged primarily on the basis of economic criteria but, rather, on the basis of its added value for society as a whole.</p>

Justification for this proposal:

Social innovations should prove to be effective before they can be scaled-up. However, evidence of effectiveness cannot be a pre-condition for innovation. If all social innovations have to be “evidence based” as a pre-requisite, the risk is that some social innovations cannot be considered as such, simply because they do not have enough financial means or other resources to assess that they comply with this requirement. It could also be understood that all social innovations must prove that they are evidence based by the means of social policy experimentations, while evidence based can be

proved in other ways, for instance by available statistics and research, evaluation of the impact on beneficiaries, etc.

Social Platform proposal for amendment 12 Amendment 30 – article 2 – paragraph 1- point d b (new)	
<p>Text proposed by rapporteur</p> <p>(db) 'Social policy experimentation' means project-based field testing of social innovations in order to gather evidence on their effectiveness and feasibility, such projects being limited in time and including a variety of actors of all sizes.</p> <p>The results of the experiments shall help to determine whether and under which conditions social innovations can be implemented on a wider scale. Social policy experimentation shall aim at improving the life of beneficiaries by tailored services or products. It shall require long-term and sustainable financing of pilot projects, monitoring and evaluation as well as the direct involvement of stakeholders and beneficiaries.</p>	<p>Text proposed by Social Platform</p> <p>(db) 'Social policy experimentation' means project-based field testing of social innovations in order to gather evidence on their effectiveness and feasibility, such projects being limited in time and including a variety of actors of all sizes.</p> <p>The results of the experiments shall help to determine whether and under which conditions social innovations can be implemented on a wider scale. Social policy experimentation shall aim at improving the life of beneficiaries by tailored services or products and should be developed with the direct involvement of stakeholders and beneficiaries. It shall require should lead to the long-term and sustainable financing of pilot projects, monitoring and evaluation as well as the direct involvement of stakeholders and beneficiaries to ensure the scaling-up of effective approaches.</p>

Justification for this proposal:

Long-term financing of pilot projects is not the goal of social innovation or the programme. Pilot projects serve to test an innovation and should by definition be limited in duration. If testing shows an innovation that proves to be effective, then adequate financing needs to be provided to implement scaling up. Scaling up will require links to other financial instruments such as ESF and ERDF.

5) Another amendment on „types of actions“:

Social Platform proposal for amendment 13 Amendment 58 – article 6 – paragraph 1 – point 2 – point b	
<p>Text proposed by rapporteur</p> <p>Deleting (b) Council Presidency events, conferences and seminars;</p>	<p>Text proposed by Social Platform</p> <p>Keep the Commission’s proposal: (b) Council Presidency events, conferences and seminars;</p>

Justification for this proposal:

We consider the choice of deleting this action not being strategic. For instance, this budget supports important spaces for direct engagement of people experiencing poverty with the Europe 2020 Objectives, the EPAP and Social OMC, such as the European Meeting of People Experiencing Poverty (co-organized between the EU Spring Presidency and the European Commission and it facilitates the linking up to the Annual Convention, coorganized by the Autumn EU Presidency and the European Commission). These are the only two spaces where people with direct experience of poverty have a chance to contribute to relevant EU processes together with a variety of stakeholders.