



# ECRE AND PICUM POSITION ON THE PROPOSAL FOR A REGULATION OF THE EUROPEAN SOCIAL FUND + 2021-2027 COM(2018) 382

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# SUMMARY

ECRE and PICUM make the following observations and recommendations to the co-legislators on the Commission proposal for a regulation of the European Parliament and of the Council on the European Social Fund Plus (ESF+) COM (2018) 382 final.

1. **Mainstream support to the integration of third country nationals** into all the objectives and sections of the fund, and avoid discrimination based on residence status.
2. **Address the five priorities of the *European Action Plan on the integration of third country nationals*** through the national operational programmes for ESF+ implementation, with a particular emphasis on education, integration into the labour market and vocational training, access to basic services and social inclusion of third country nationals.
3. **Ensure that integration of asylum seekers and newly arriving migrants does not fall between the European Social Fund+ (ESF+) and the AMF (Asylum and Migration Fund):** the proposed division of responsibility between AMF and ESF+ must be clarified to ensure that integration and participation from the day third country nationals arrive in an EU Member State is ensured.
4. **Allocate adequate resources under shared management to social inclusion**, including integration of third country nationals, in order to avoid competition among different target groups and effectively manage the increase in demand for social inclusion measures.
5. **Uphold the fight against material deprivation and destitution as a key objective of the fund**, keeping the resources set within the current FEAD programme. Food and material aid provision should represent a vehicle to access further social services, and should be provided with the lowest reporting requirements possible.
6. **Confirm civil society's centrality in the preparation, implementation and evaluation of ESF+ actions**, as this is crucial to ensure good implementation of all the specific objectives of the Regulation, and to avoid the exclusion of third country nationals from final recipients. The Partnership Principle should enable adequate participation of civil society organisations in all member states.
7. **Ensure policy cooperation between authorities managing ESF+ and AMF funding**, to enhance synergies between the two funds. The Monitoring committees, established by member states, should provide for cooperation or establish cross-fund sub-committees, as well as ensure the usage of the same indicators.
8. **Promote and upscale successful inclusion experiences at the local and regional levels with adequate funding.** When needed, resources from the direct management strand should be available as a direct support for civil society organisations and local authorities that have developed good practices in inclusion.

# INTRODUCTION

The proposal for a regulation establishing the **European Social Fund Plus (ESF+)** is part of the European Commission's proposal for the next **Multi-annual Financial Framework (MFF) 2021–2027**.

This proposal for a funding instrument builds on the experiences of the current financial period. It aims to put into one instrument all the current Cohesion funds, which cover different objectives on social inclusion. It will thus simplify procedures supporting the delivery of the European Pillar of Social Rights. The ESF+ puts together the current European Social Fund with the Youth Employment Initiative (YEI), the Fund for European Aid to the Most Deprived (FEAD), the Employment and Social Innovation (EaSI) programme and the Programme for the Union's Action in the field of health (the Health Programme).

Merging these instruments, the European Commission aims to enhance synergies between the existing programmes, to simplify the management of funds at the national level and to reduce the administrative burden for managing authorities and beneficiaries. Although ESF funds are currently employed in a number of member states for the integration of third country nationals, from the next MFF, long-term integration of third country nationals will be directly included in the ESF objectives while early integration measures will be financed through the Asylum and Migration Fund (AMF).

ECRE and PICUM welcome the transfer of long-term integration of third country nationals from the AMF to the ESF+ as this choice is a step towards the inclusion of migrants into general social inclusion, education and labour integration policies, and the overcoming of targeted programmes based on recipients' residence status. In addition, including migrant inclusion in funding that targets a wider group across Europe, and that is managed by ministries for Employment and Social Affairs rather than Home Affairs and Migration, puts the potential inclusion of third country nationals on an equal footing with that of minorities and other disadvantaged target groups. Avoiding separate approaches for the inclusion of migrants and of nationals is also a way to prevent the idea of a possible "competition" between third country nationals and other disadvantaged groups, an idea which is increasingly fostered by populist politics.

The inclusion of migrants in the ESF+ however raises the question of the amount of funding to be provided. The proposed budget of 101.2 billion Euro is still to be confirmed given that the overall budget for the MFF 2021-2027 has not been approved yet, and there are clear risks of an overall decrease in funding for Cohesion policy.

Although ESF+ introduces a specific objective for socio-economic integration of third country nationals<sup>1</sup>, it does not ring-fence resources for this objective. To face the need for increased efforts in social inclusion, it is essential to ensure that a reasonable share of funding is allocated to this objective. Furthermore, a substantial amount of money should go to programmes tackling social exclusion through food and material assistance, to protect from extreme destitution those who are waiting for status determination, or who have not received a regular immigration status.

Splitting integration between long-term and early measures risks undermining the inclusion of newcomers – and in particular asylum seekers – in activities aiming at training and including people in the labour market. Integration is a process which should start as early as possible, and inclusion in the labour market is recognised by the EU as "central to the participation of immigrants, to the contributions immigrants make to the host society, and to making such contributions visible".<sup>2</sup> Asylum seekers should thus be allowed to benefit from ESF+ funded actions on education and promotion of employability.

Meaningful cooperation between the managing authorities of ESF+ and the upcoming AMF fund should be built into funding processes and the institutional set up in order to better shape such a crosscutting policy issue as integration, which is covered by both funds.

Civil society's centrality in the preparation, implementation and evaluation of actions funded by ESF+ is crucial to ensure good implementation of all the specific objectives of the Regulation, including the integration of third country nationals. Strengthening the Partnership Principle in the code of conduct for the management of the fund is a positive element in the proposal, and should be the means for full inclusion of civil society as equal

1. Specific objective viii in the European Commission's proposal for a regulation of the European Parliament and of the Council on the European Social Fund Plus (ESF+), COM(2018) 382 final
2. N. 3 of the **Common Basic Principles for Immigrants Integration Policy**, adopted by the Justice and Home Affairs Council in 2004 and making the foundations of EU initiatives in the field of integration.

stakeholders in the preparation of programmes and in the monitoring committees.

Finally, using directly managed funding it will be possible to support and scale up local good practices for migrant inclusion – even in member states which do not want to allocate resources to migration. These initiatives provide (EU) added value both to newcomers and to the local communities. Innovative experiences of inclusion at the local level developed by cities, local and regional authorities, social partners and civil society organisations should be able to access specific funding.

The following paper is based on insights from ECRE and PICUM and includes joint comments from both networks to improve the ESF+ proposal. Many members of the two networks are beneficiaries of funding under the current Asylum, Migration and Integration Fund (AMIF), the European Social Fund (ESF) as well as the Fund for European Aid to the Most Deprived (FEAD) inter alia. A full list of proposed amendments can be found in the annex, for ease of reference.

# INCLUSION OF THIRD COUNTRY NATIONALS AS A SPECIFIC TARGET GROUP AMONG FINAL RECIPIENTS OF THE FUND

ESF+ funded programs cover a broad range of goals, such as the promotion of sustainable and quality employment and the support to labour mobility; the promotion of social inclusion; combating poverty and any discrimination; and investment into education, training and vocational training for skills and life-long learning, regardless the status of each final recipient. In addition, the proposed inclusion of the EU's Employment and Social Innovation programme and the Health Programme in the fund could lead to innovative and targeted solutions to problems, complementing traditional social services and enabling them to face modern challenges.

ECRE and PICUM welcome the plan that the social inclusion of migrants, people seeking asylum and refugees be part of the proposed ESF+ programme. This decision should contribute to a more mainstreamed approach to social services and towards the increased access of third country nationals to regular, mainstream social services, rather than subsidiary and separate systems.

However, we highlight a few concerns:

- » The new ESF+ funding instrument puts integration of migrants in the broader framework of building more inclusive societies, and can facilitate a more holistic approach to migrants' integration, with accession to employment, housing, social services. It is essential therefore that the participation of third country nationals within the services funded with ESF+ programmes follows the principles of equality of opportunities and non-discrimination.
- » EU funding is a key means for implementing many important EU initiatives. As the new ESF+ will be spent for mid-term and long-term measures for integration of migrants, the formulation of Operative Programmes by National Authorities should keep in mind the [European Action Plan on the integration of third-country nationals](#)<sup>3</sup>. Specific reporting on how the Cohesion Funds (with a specific look at AMF, ESF+ and ERDF) contribute to the implementation of the European Action Plan on the integration of third-country nationals should be requested by the Commission (with a mid-term and a final edition), focusing on the shared managed funds and in particular, the outcomes of Member States' national programmes.
- » Third country nationals should be included as recipients of measures under all the specific objectives of the fund, together with other disadvantaged groups, and not only in targeted measures covering Objective 1.viii (Promoting socio-economic integration of third country nationals and of marginalised communities such as the Roma).
- » The **European Pillar of Social Rights (EPSR)** is currently the document that guides the application of the ESF+, and the rationale for merging of its funding objectives. However, the principles in this document concern EU citizens and third country nationals with regular residence, with unclear reference to people seeking asylum, and clear exclusion of newcomers, people whose claims have been rejected or who have an irregular status. The commitment of the Union towards social rights goes beyond the EPSR, with a reference in the **European Social Charter**, included in Article 151 TFEU. The EU is also committed to social inclusion with regard to the **Sustainable Development Goals (SDGs)**. Emphasising the link between the ESF+ proposal and both the Social Charter and SDGs is important to uphold the inclusiveness of the ESF+ and to broaden its scope beyond the EPSR.

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3. The EU Integration Action Plan of Third-Country Nationals COM(2016) 377 final, adopted by the Council of the European Union on the 9 December 2016.

## ECRE AND PICUM THEREFORE RECOMMEND THE FOLLOWING AMENDMENTS TO THE COMMISSION'S PROPOSAL

### Amend recital 3 to read:

[...] The ESF+ should also contribute to relevant aspects of the implementation of key Union initiatives and activities, in particular the “Skills Agenda for Europe”, **and the European Education Area and the Action Plan on the Integration of Third-Country Nationals**, relevant Council Recommendations and other initiatives such as the Youth Guarantee, Upskilling Pathways and on Integration of the long-term unemployed.

### Add the following paragraph to recital 4:

[...] The Council welcomed the Commission Communication on “Next steps for a sustainable European future” of 22 November 2016 as a first step in mainstreaming the Sustainable Development Goals and applying sustainable development as an essential guiding principle for all Union policies, including through its financing instruments.

The European Social Fund + can make a particular contribution to implementing the Sustainable Development Goals by halving relative poverty and eradicating extreme forms of poverty (goal 1); quality and inclusive education (goal 4), promoting gender equality (goal 5), promoting sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all (goal 8), and reducing inequality (goal 10).

### Add the following recital after Recital 4:

#### Recital 4.1 (new)

The Union and its member states, having in mind the European Social Charter signed at Turin on 18 October 1961, shall have in their objectives the promotion of employment, improved living and working conditions, with a view to lasting high employment and the combating of exclusion, in accordance with Article 151 TFEU.

### Amend recital 18 to read:

The ESF+ should support Member States' efforts to tackle poverty with a view to breaking the cycle of disadvantage across generations and promote social inclusion by ensuring equal opportunities for all, tackling discrimination and addressing health inequalities. This implies mobilising a range of policies targeting the most disadvantaged people regardless of their age, including children, marginalised communities such as the Roma, **people with disabilities, people experiencing homelessness, third country nationals, with a particular attention to the participation of those seeking asylum and refugees** and the working poor. The ESF+ should promote the active inclusion of people far from the labour market with a view to ensuring their socio-economic integration. The ESF+ should be also used to enhance timely and equal access to affordable, sustainable and high quality services such as healthcare and long-term care, in particular family and community-based care services. The ESF+ should contribute to the modernisation of social protection systems with a view in particular to promoting their accessibility.

### Amend article 3 to read:

The ESF+ aims to support Member States to achieve high employment levels, fair social protection and a skilled and resilient workforce ready for the future world of work, in line with the principles set out in the European Pillar of Social Rights proclaimed by the European Parliament, the Council and the Commission on 17 November 2017. **The ESF+ also aims to contribute to fulfilling the commitment of the Union and its member states to achieve the Sustainable Development Goals.**

The ESF+ shall support, complement and add value to the policies of the Member States to ensure equal opportunities, **non discrimination**, **equal** access to the labour market, fair working conditions, social protection and inclusion **for all**, and a high level of human health protection.

**Amend article 4.1 to read:**

**Objectives of the fund**

The ESF+ shall support the following specific objectives in the policy areas of employment, education, social inclusion and health, and thereby also contributing to the policy objective for “A more social Europe – Implementing the European Pillar of social Rights” set out in article [4] of the [future CPR]:

[...]

(iv) improving the quality, **inclusiveness** and effectiveness and labour market relevance of education and training systems, to support acquisition of key competences including digital skills;

(v) promoting equal access to and completion of, quality and inclusive education and training, in particular for disadvantaged groups, from early childhood education and care through general and vocational education and training, and to tertiary level, as well as adult education and learning, including facilitating learning mobility for all;

(vi) promoting lifelong learning, notably flexible upskilling and reskilling opportunities for all taking into account digital skills, better anticipating change and new skills requirements based on labour market needs, facilitating career transitions and promoting professional mobility;

(vii) fostering active inclusion with a view to promoting equal opportunities, **non discrimination** and active participation, and improving employability **and social inclusion**;

(viii) promoting **long term**, socio-economic integration of third country nationals and of marginalised communities such as the Roma;

**Amend article 6.1 to read:**

All programmes implemented under the ESF+ strand under shared management, as well as the operations supported by the Employment and Social Innovation and Health strands shall ensure equality between men and women throughout their preparation, implementation, monitoring and evaluation. They shall also promote equal opportunities for all, without discrimination based on sex, **nationality**, **residence status**, racial or ethnic origin, religion or belief, disability, age or sexual orientation throughout their preparation, implementation, monitoring and evaluation.



# SOCIAL INCLUSION

The current proposal for the Asylum and Migration Fund (AMF) foresees a shift of the objective of integration of third country nationals to the ESF+. Considering the average increase of protection granted to third country nationals in recent years (the number of asylum seekers granted a level of protection under international or national legislation reached 60% in 2016), and the overall increase of arrivals to Europe from 2015, the increase in the number of final recipients of social inclusion measures should be taken into account.

It is therefore essential that a significant share of the funding is dedicated to social inclusion measures, which include combating poverty and any discrimination, as stated in the current specific objective on social inclusion.<sup>4</sup> The current minimum benchmark (20% of the total ESF resources in each member state) *has been exceeded by most EU member states in the current funding period*, which led the European Commission to propose an increase in this ceiling to 25% of the fund.

To effectively support the need for social inclusion measures across the Union, and to cope with the increased number of final recipients that the ESF+ fund will face, the share of ESF+ funding allocated to social inclusion should be at least 30%. A minimum allocation to integration of third country nationals could be foreseen inside this quota. However this should not be for actions solely for the benefit of third country nationals – a choice that would work contrary to mainstreaming and inclusive approaches – but rather to support the participation of third country nationals in mainstream programmes according to their effective number in each region. Third country nationals' participation in programmes should be guaranteed to a level that corresponds with the net migration balance of each region.<sup>5</sup>

**ECRE and PICUM therefore recommend the following amendments to the Commission's proposal:**

**Amend recital 22 to read:**

To ensure that the social dimension of Europe as set out in the European Pillar of Social Rights is duly put forward and that a minimum amount of resources is targeting those most in need Member States should allocate at least ~~25%~~ **30%** of their national ESF+ resources of the ESF+ strand under shared management to fostering social inclusion, **combating poverty and any discrimination**.

**Amend article 7.3 to read:**

## Consistency and thematic concentration

[...]

3. Member States shall allocate at least ~~25% of their ESF+ resources~~ **30% of their ESF + resources** under shared management to the specific objectives for the social inclusion policy area set out in points (vii) to (xi) of Article 4(1), including the promotion of the socio-economic integration of third country nationals.

4. Regulation (EU) No 1304/2013 Of the European Parliament and Of the Council Of 17 December 2013

5. Including relevant quotas of third country nationals in social inclusion programmes through a share coherent with the overall net-migration from third countries met by each region would be coherent with the inclusion of net-migration as a criterion for calculation of overall allocation of funding to Cohesion Policy, as foreseen by the Commission' Proposal for a Common Provision Regulation on funds for Cohesion Policy – Annex XXII to COM(2018) 375 final.

# ADDRESSING MATERIAL DEPRIVATION

Among its goals, the ESF+ fund will address provision of food and material support to the most deprived people, currently provided through the FEAD programme. Research on this fund has found that the food, material aid and social inclusion measures it supports make a difference to the most deprived people in society, including those who otherwise may be left out by mainstream social assistance or who need immediate support. The unique nature of FEAD in enabling some of the most vulnerable to receive basic assistance – including undocumented migrants and undeclared residents. It thus contributes to preventing destitution and provides an initial step towards social inclusion.

Synergies among the current ESF and FEAD can improve the efficiency in the funding and provide good, long-term solutions to recipients of material support.

We highlight however a few concerns:

- » Considering the proposed overall ESF+ budget of 100 billion Euros for its shared managed fund, the current proposal of a minimum rate of 2% earmarked for the objective of addressing material deprivation, represents a drop by nearly a half from the current FEAD budget of 3.8 billion Euros. To ensure that a minimum 4% quota is reached in each EU member state, as stated by the European Commission through Recital 19 of its proposal, we recommend setting the minimum rate devoted to tackling material deprivation to 4%.
- » Currently, member states are able to decide whether this money should be used directly for material support (the current Operative Programme I) or to complement national spending with this goal, with measures of social inclusion for the most deprived persons (Operative Programme II). We hope that merging the current FEAD with ESF will increase opportunities for synergies between food/material support and basic social inclusion measures, and we believe that the combination of these two goals in the same projects should be encouraged. This often represents the only way to reach certain target groups with social inclusion measures: as food and material aid always come as emergency measures, it can turn into a door-opening opportunity for long-term solutions.
- » The organisations involved in addressing material deprivation are often small, based at the local level and with very limited budgets. This means that many organisations engaged in providing relief from severe poverty may not have the possibility to increase their share of funds for projects. The co-financing rate for this priority shall therefore remain equal to the one of the current FEAD programme.
- » In addition, organisations working at the grassroots level to provide material assistance and to reach out to the most deprived often deliver their services thanks to the work of committed volunteers. For this reason, it is essential to keep the management rules, the subsequent administrative requirements and indicators to be checked for the monitoring of results as light as possible, both because of the nature of the final recipients (who might prefer to be anonymous) and of the human resources involved (e.g. volunteers). We therefore stress the importance for all co-legislators to agree to the Commission's proposal and keep a separate Chapter III, with simpler management rules for assistance to material deprivation, in order to ensure that the implementation of ESF+ does not create unnecessary burden in projects directed to this priority.
- » Due to their residence status, some final recipients of programmes that tackle material deprivation and provide supportive social inclusion measures, such as legal counselling or health services, might prove reluctant to share their personal data. Reporting needs shall by no means discourage people to attend services alleviating social exclusion.

**ECRE and PICUM therefore recommend the following amendments to the Proposal:**

**Amend article 7.4 to read:**

4. Member States shall allocate at least ~~2%~~ 4% of their ESF+ resources under shared management to the specific objective of addressing material deprivation set out in point (xi) of Article 4(1).

~~In duly justified cases, the resources allocated to the specific objective set out in point (x) of Article 4(1) and targeting the most deprived may be taken into account for verifying compliance with the minimum allocation of at least 2% set out in the first subparagraph of this paragraph.~~

**Amend article 9 to read:**

The resources referred to in Article 7(4) shall be programmed under a dedicated priority or programme. **The co-financing rate for this priority or programme is set at 85%.**

**Amend article 17.4 to read:**

**Principles**

[...]

4. The delivery of food and/or material assistance **may shall** be complemented with re-orientation towards competent services and other accompanying measures aiming at the social inclusion of the most deprived persons.

**Amend article 20.1 to read:**

**Eligibility of expenditure**

The eligible costs of the ESF+ support for addressing material deprivation shall be:

[...]

(e) the costs of accompanying measures undertaken by or on behalf of beneficiaries and declared by the beneficiaries delivering the food and/or basic material assistance to the most deprived persons at a flat- rate of **at least 5%** of the costs referred to in point (a).

**Amend article 21 to read:**

**Indicators and reporting**

1. Priorities addressing material deprivation shall use common output and result indicators, as set out in Annex II to this Regulation to monitor progress in implementation. These programmes may also use programme-specific indicators. **Reporting requirements towards measures addressing material deprivation should be kept as simple as possible, due to the volunteer-based nature of this service.**

2. The reference values for common and programme-specific result indicators shall be established.

3. By 30 June 2025 and 30 June 2028, Managing Authorities shall report to the Commission the results of a structured **anonymous** survey of the end recipients carried out during the previous year **and focusing on their living conditions and the nature of their material deprivation**. This survey shall be based on the model which shall be established by the Commission by means of an implementing act. [...]

**Amend Annex I to read:**

**Common indicators for the general support of the ESF+ strand under shared management**

All personal data are to be broken down by gender (female, male, 'non binary'). If certain results are not possible, data for those results do not have to be collected and reported.

**Sensitive personal data should be registered anonymously when requested by the final recipient, especially in case of persons accessing services that tackle severe material deprivation or accompanying measures of social inclusion.**(1) Common output indicators related to operations targeting people:

(1.a) Common output indicators for participants

[...]

(1.b) Common output indicators for participants

If data for these indicators is not collected from data registers, values on these indicators can be determined based on informed estimates by the beneficiary. **Data is provided by participants on a voluntary basis. In case of refusal of indication of data, it does not lead to negative implications for participants or project leads.**

[...]

**Amend Annex II to read:**

**Common indicators for ESF+ support for addressing material deprivation**

**(1) Output Indicators**

~~(a) Total monetary value of distributed food and goods:~~

~~(i) total value of the food support;~~

~~— (ia) total monetary value of food for children;~~

~~— (ib) total monetary value of food for the homeless;~~

~~— (ic) total monetary value of food for other target groups.~~

~~(ii) total value of goods distributed~~

~~— (iia) total monetary value of goods for children;~~

~~— (iib) total monetary value of goods for the homeless;~~

~~— (iic) total monetary value of goods for other target groups.~~

**1. Total number of persons receiving social inclusion assistance to the most deprived;**

**2. Total number of persons met during outreach activities and street work;**

**3. Total number of consultations;**

**4. Total number of referrals to:**

- **other low threshold services implemented within the ESF+ objective of material assistance**
- **public administration services (as public employment services, social benefit support, housing services, etc).**

# PARTNERSHIP PRINCIPLE AND CENTRALITY OF THE CIVIL SOCIETY

The Partnership Principle, which is included in the Common Provision Regulation (CPR), enables greater participation of civil society organisations and social partners in the next Multiannual Financial Framework, as they will be able to take part in the preparation, implementation, monitoring and evaluation of the national programmes. In our view, this is a welcome development, as the current interpretations of the partnership principle vary from member state to member state. The Commission's proposal recognises the central position of civil society in the delivering of many projects at the local and national level and in contributing to the fulfilment of ESF objectives.

Due to its centrality in delivering social inclusion measures in cooperation with national authorities, civil society should be included in advisory bodies such as the ESF+ committee, which delivers opinions on the objectives of the fund and on technical assistance issues concerning the support of ESF+ to overall EU strategies. The involvement of civil society in addition to government and social partners should also be strongly supported at the national level.

**ECRE and PICUM recommend therefore the following amendments to the Commission's Proposal:**

**Amend article 8 to read:**

## Partnership

1. Each Member State shall ensure **adequate meaningful and inclusive** participation of social partners and civil society organisations in the **management, programming, delivery, monitoring and evaluation of activities and policies supported by the ESF strand under shared management, including** ~~of~~ employment, education and social inclusion policies supported by the ESF+ strand under shared management, **in accordance with article 6 of the common provision regulation.**
2. Member States shall allocate an appropriate amount of ESF+ resources under shared management in each programme for the capacity building of social partners and civil society organisations.

**Amend article 40 to read:**

## Committee under Article 163 TFEU

1. [...]
2. Each Member State shall appoint one government representative, one representative of the workers' organisations, one representative of the employers' organisations, **one representative of civil society, according to the common provision regulation of the structural fund** and one alternate for each member for a maximum period of seven years. In the absence of a member, the alternate shall be automatically entitled to take part in the proceedings.
3. The ESF+ Committee shall include one representative from each of the organisations representing workers' organisations, ~~and~~ employers' organisations **and civil society organisations** at Union level.

# PROMOTION OF INCLUSION EXPERIENCES AT THE LOCAL AND REGIONAL LEVEL

Cooperation between civil society organisations and local authorities has proved to be crucial for the development of good models for inclusion of migrants and refugees. Local government and cities' engagement with civil society in the inclusion of third country nationals has produced successful experiences, enabling citizens and local communities to participate in the provision of services, implementing a dual approach to integration which benefits all actors.

We strongly believe that these positive experiences should be supported and scaled up with adequate resources, also in those member states for whom migrant integration does not represent a policy priority, and where central governments may allocate fewer resources to this area (and concentrate ESF+ funding support on other social inclusion activities). In these cases, this could be addressed by making funding under direct management available to local actors.

For this reason, we support the proposal of including local projects developed by cities, local and regional authorities, social partners and civil society organisations in the field of social inclusion and integration of third-country nationals among the recipients of funding under the **Employment and Social Innovation** strand. Such initiatives at the local level need to be rewarded and considered as examples of social innovation, and supported as such.

**ECRE and PICUM therefore support the following amendments to the Commission's Proposal:**

**Amend article 23.c to read:**

[The Employment and Social Innovation strand has the following operational objectives]

## Operational Objectives

c) to support social experimentations in the fields referred to in Article 3 and build up the stakeholders' capacity to implement, transfer or upscale the tested social policy innovations, ***with a special focus on promoting the scaling up of local projects developed by cities, local and regional authorities, social partners and civil society organisations in the field of reception and social inclusion and integration of third-country nationals.***

# ANNEX – LIST OF PROPOSED AMENDMENTS

## Amend recital 3 to read:

[...] The ESF+ should also contribute to relevant aspects of the implementation of key Union initiatives and activities, in particular the “Skills Agenda for Europe”, **and** the European Education Area **and the Action Plan on the integration of third-country nationals**, relevant Council Recommendations and other initiatives such as the Youth Guarantee, Upskilling Pathways and on Integration of the long-term unemployed.

## Add the following paragraph to recital 4:

[...] The Council welcomed the Commission Communication on “Next steps for a sustainable European future” of 22 November 2016 as a first step in mainstreaming the Sustainable Development Goals and applying sustainable development as an essential guiding principle for all Union policies, including through its financing instruments.

**The European Social Fund + can make a particular contribution to implementing the Sustainable Development Goals by halving relative poverty and eradicating extreme forms of poverty (goal 1); quality and inclusive education (goal 4), promoting gender equality (goal 5), promoting sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all (goal 8), and reducing inequality (goal 10).**

## Add the following recital after recital 4:

### Recital 4.1 (new)

**The Union and its member states, having in mind the European Social Charter signed at Turin on 18 October 1961, shall have in their objectives the promotion of employment, improved living and working conditions, with a view to lasting high employment and the combating of exclusion, in accordance with Article 151 TFEU.**

## Amend recital 18 to read:

The ESF+ should support Member States’ efforts to tackle poverty with a view to breaking the cycle of disadvantage across generations and promote social inclusion by ensuring equal opportunities for all, tackling discrimination and addressing health inequalities. This implies mobilising a range of policies targeting the most disadvantaged people regardless of their age, including children, marginalised communities such as the Roma, **people with disabilities, people experiencing homelessness, third country nationals, with a particular attention to the participation of those seeking asylum and refugees** and the working poor. The ESF+ should promote the active inclusion of people far from the labour market with a view to ensuring their socio-economic integration. The ESF+ should be also used to enhance timely and equal access to affordable, sustainable and high quality services such as healthcare and long-term care, in particular family and community-based care services. The ESF+ should contribute to the modernisation of social protection systems with a view in particular to promoting their accessibility.

## Amend recital 22 to read:

To ensure that the social dimension of Europe as set out in the European Pillar of Social Rights is duly put forward and that a minimum amount of resources is targeting those most in need Member States should allocate at least ~~25%~~ **30%** of their national ESF+ resources of the ESF+ strand under shared management to fostering social inclusion, **combating poverty and any discrimination**.

**Amend article 3 to read:**

The ESF+ aims to support Member States to achieve high employment levels, fair social protection and a skilled and resilient workforce ready for the future world of work, in line with the principles set out in the European Pillar of Social Rights proclaimed by the European Parliament, the Council and the Commission on 17 November 2017. **The ESF+ also aims to contribute to fulfilling the commitment of the Union and its member states to achieve the Sustainable Development Goals.**

The ESF+ shall support, complement and add value to the policies of the Member States to ensure equal opportunities, **non discrimination**, **equal** access to the labour market, fair working conditions, social protection and inclusion **for all**, and a high level of human health protection.

**Amend article 4.1 to read:**

**Objectives of the fund**

The ESF+ shall support the following specific objectives in the policy areas of employment, education, social inclusion and health, and thereby also contributing to the policy objective for “A more social Europe – Implementing the European Pillar of social Rights” set out in article [4] of the [future CPR]:

[...]

(iv) improving the quality, **inclusiveness and** effectiveness and labour market relevance of education and training systems, to support acquisition of key competences including digital skills;

(v) promoting equal access to and completion of, quality and inclusive education and training, in particular for disadvantaged groups, from early childhood education and care through general and vocational education and training, and to tertiary level, as well as adult education and learning, including facilitating learning mobility for all;

(vi) promoting lifelong learning, notably flexible upskilling and reskilling opportunities for all taking into account digital skills, better anticipating change and new skills requirements based on labour market needs, facilitating career transitions and promoting professional mobility;

(vii) fostering active inclusion with a view to promoting equal opportunities, **non discrimination** and active participation, and improving employability **and social inclusion**;

(viii) promoting **long term**, socio-economic integration of third country nationals and of marginalised communities such as the Roma;

**Amend article 6.1 to read:**

2. All programmes implemented under the ESF+ strand under shared management, as well as the operations supported by the Employment and Social Innovation and Health strands shall ensure equality between men and women throughout their preparation, implementation, monitoring and evaluation. They shall also promote equal opportunities for all, without discrimination based on sex, **nationality, residence status**, racial or ethnic origin, religion or belief, disability, age or sexual orientation throughout their preparation, implementation, monitoring and evaluation.

**Amend article 7.3 to read:**

**Consistency and thematic concentration**

[...]

3. Member States shall allocate at least **25% of their ESF+ resources** **30% of their ESF + resources** under shared management to the specific objectives for the social inclusion policy area set out in points (vii) to (xi) of Article 4(1), including the promotion of the socio-economic integration of third country nationals.



**Add the following paragraph after paragraph 7.3**

**Amend article 7.4 to read:**

4. Member States shall allocate at least **2% 4%** of their ESF+ resources under shared management to the specific objective of addressing material deprivation set out in point (xi) of Article 4(1).

**In duly justified cases, the resources allocated to the specific objective set out in point (x) of Article 4(1) and targeting the most deprived may be taken into account for verifying compliance with the minimum allocation of at least 2% set out in the first subparagraph of this paragraph.**

**Amend article 8 to read:**

#### **Partnership**

1. Each Member State shall ensure **adequate meaningful and inclusive** participation of social partners and civil society organisations in the **management, programming, delivery, monitoring and evaluation of activities and policies supported by the ESF strand under shared management, including of employment, education and social inclusion policies supported by the ESF+ strand under shared management, in accordance with article 6 of the common provision regulation.**

2. Member States shall allocate an appropriate amount of ESF+ resources under shared management in each programme for the capacity building of social partners and civil society organisations.

**Amend article 9 to read:**

The resources referred to in Article 7(4) shall be programmed under a dedicated priority or programme. **The co-financing rate for this priority or programme is set at 85%.**

**Amend article 17.4 to read:**

#### **Principles**

[...]

4. The delivery of food and/or material assistance **may shall** be complemented with re-orientation towards competent services and other accompanying measures aiming at the social inclusion of the most deprived persons.

**Amend article 20.1 to read:**

#### **Eligibility of expenditure**

The eligible costs of the ESF+ support for addressing material deprivation shall be:

[...]

(e) the costs of accompanying measures undertaken by or on behalf of beneficiaries and declared by the beneficiaries delivering the food and/or basic material assistance to the most deprived persons at a flat- rate of **at least 5%** of the costs referred to in point (a).

**Amend article 21 to read:**

#### **Indicators and reporting**

1. Priorities addressing material deprivation shall use common output and result indicators, as set out in Annex II to this Regulation to monitor progress in implementation. These programmes may also use programme-specific indicators. **Reporting requirements towards measures addressing material**

deprivation should be kept as simple as possible, due to the volunteers-based nature of this service.

2. The reference values for common and programme-specific result indicators shall be established.

3. By 30 June 2025 and 30 June 2028, Managing Authorities shall report to the Commission the results of a structured **anonymous** survey of the end recipients carried out during the previous year **and focusing on their living conditions and the nature of their material deprivation**. This survey shall be based on the model which shall be established by the Commission by means of an implementing act. [...]

#### Amend article 23.c to read:

[The Employment and Social Innovation strand has the following operational objectives]

##### Operational Objectives

c) to support social experimentations in the fields referred to in Article 3 and build up the stakeholders' capacity to implement, transfer or upscale the tested social policy innovations, **with a special focus on promoting the scaling up of local projects developed by cities, local and regional authorities, social partners and civil society organisations in the field of reception and social inclusion and integration of third-country nationals**.

#### Amend article 40 to read:

##### Committee under Article 163 TFEU

1. [...]

2. Each Member State shall appoint one government representative, one representative of the workers' organisations, one representative of the employers' organisations, **one representative of civil society, according to the common provision regulation of the structural fund** and one alternate for each member for a maximum period of seven years. In the absence of a member, the alternate shall be automatically entitled to take part in the proceedings.

3. The ESF+ Committee shall include one representative from each of the organisations representing workers' organisations, **and employers' organisations and civil society organisations** at Union level.

#### Amend Annex I to read:

##### Common indicators for the general support of the ESF+ strand under shared management

All personal data are to be broken down by gender (female, male, 'non binary'). If certain results are not possible, data for those results do not have to be collected and reported.

**Sensitive personal data should be registered anonymously when requested by the final recipient, especially in case of persons accessing services that tackle severe material deprivation or accompanying measures of social inclusion.**

Common output indicators related to operations targeting people:

##### (1.a) Common output indicators for participants

[...]

##### (1.b) Common output indicators for participants

If data for these indicators is not collected from data registers, values on these indicators can be determined based on informed estimates by the beneficiary. **Data is provided by participants on a voluntary basis. In case of refusal of indication of data, it does not lead to negative implications for participants or project leads.**

[...]

**Amend Annex II to read:**

**Common indicators for ESF+ support for addressing material deprivation**

**(1) Output Indicators**

(a) Total monetary value of distributed food and goods.

(i) **total value of the food support;**

(ia) **total monetary value of food for children;**

(ib) **total monetary value of food for the homeless;**

(ic) **total monetary value of food for other target groups.**

(ii) **total value of goods distributed**

(iia) **total monetary value of goods for children;**

(iib) **total monetary value of goods for the homeless;**

(iic) **total monetary value of goods for other target groups.**

**1.Total number of persons receiving social inclusion assistance to the most deprived;**

**2. Total number of persons met during outreach activities and street work;**

**3. Total number of consultations;**

**4. Total number of referrals to:**

- **other low threshold services implemented within the ESF+ objective of material assistance**
- **public administration services (as public employment services, social benefit support, housing services, etc.).**



*ECRE is an alliance of 99 NGOs across 40 European countries. It was established in 1974 and has grown rapidly in recent years, reflecting European civil society's continued commitment to the right to asylum. ECRE's mission is to protect and advance the rights of refugees, asylum-seekers and other forcibly displaced persons in Europe and in Europe's external policies. Its diverse membership ranges from large INGOs with global presence to small organisations of dedicated activists. Members' work covers the full circle of displacement from zones of conflict, to the dangerous routes and arrival in Europe, to long-term inclusion in European societies, with their activities including humanitarian relief, social service provision, legal assistance, litigation, monitoring policy and law, advocacy and campaigning.*

*ECRE's secretariat in Brussels informs, supports and works with the membership through joint events, the Annual General Conference, briefings to members and management of specialist working groups. ECRE's work covers four main activities: Legal Support and Litigation, Legal and Policy Research, Advocacy and Communication. <https://ecre.org>*



PLATFORM FOR INTERNATIONAL COOPERATION ON  
UNDOCUMENTED MIGRANTS

*The Platform for International Cooperation on Undocumented Migrants (PICUM) was founded in 2001 as an initiative of grassroots organisations. Now representing a network of more than 151 **organisations** working with undocumented migrants in more than 32 countries, primarily in Europe as well as in other world regions, PICUM has built a comprehensive evidence base regarding the gap between international human rights law and the policies and practices existing at national level.*

*With over ten years of evidence, experience and expertise on undocumented migrants, PICUM promotes recognition of their fundamental rights, providing an essential link between local realities and the debates at policy level. <https://picum.org>*