

EASPD ist der Europäische Verband der Dienstleistungserbringer für Menschen mit Behinderungen. Wir sind eine europäische gemeinnützige Organisation, die über 17.000 soziale Dienste und Behindertenorganisationen in ganz Europa vertritt. Das Hauptziel von EASPD besteht darin, die Chancengleichheit für Menschen mit Behinderungen durch wirksame und qualitativ hochwertige Dienstleistungssysteme zu fördern.



BEWERTUNG VON FINANZIERUNGSMODELLEN FÜR EINE ERFOLGREICHE UMSETZUNG DER KINDERGARANTIE

Lehren aus der Jugendgarantie

DANKSAGUNG

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Kurzfassung

Kinderarmut gehört zu den größten Herausforderungen, mit denen sich Europa derzeit konfrontiert sieht. Laut den aktuellen Eurostat-Daten waren 2018 in Europa 24,3 % der Bevölkerung im Alter von 0 bis 17 Jahren von Armut oder sozialer Ausgrenzung bedroht. Viele Familien haben aufgrund von Migration, wirtschaftlicher Not, Behinderung oder Diskriminierung Schwierigkeiten, ihren Lebensunterhalt zu bestreiten. Kinder sind die ersten, die darunter leiden, und die Folgen davon werden noch Jahre später zu spüren sein. In Anerkennung der Tatsache, dass Kinder, die in Armut und sozialer Ausgrenzung aufwachsen, mit geringerer Wahrscheinlichkeit gute schulische Leistungen erbringen, sich guter Gesundheit erfreuen und ihr volles Potenzial im Leben ausschöpfen, und im Erwachsenenalter mit höherer Wahrscheinlichkeit arbeitslos, arm und sozial ausgegrenzt sind, hat sich die EU verpflichtet, die Beseitigung von Kinderarmut zu unterstützen, und zu diesem Zweck 2021 eine Kindergarantie verabschiedet, um sicherzustellen, dass Kinder in den am meisten gefährdeten Situationen Zugang zu sozialen Schlüsselrechten haben.

Die Kindergarantie soll sicherstellen, dass alle Kinder in Europa, die von Armut oder sozialer Ausgrenzung bedroht oder anderweitig benachteiligt sind, Zugang zu essentiellen Dienstleistungen guter Qualität haben. Darin wird empfohlen, dass EU-Länder in Strategien und Aktionspläne investieren und solche entwickeln, um sicherzustellen, dass bedürftige Kinder Zugang zu kostenlosen oder bezahlbaren Dienstleistungen haben, wie z. B. Gesundheitsversorgung, Bildung, einschließlich frühkindliche Bildung, Betreuung und Erziehung (ECEC), angemessene Ernährung, Wohnen sowie Kultur- und Freizeitaktivitäten. Mit der Investition in Kinder stellt man sicher, dass alle Kinder, unabhängig von ihrem Status, den gleichen Start ins Leben und die gleichen Möglichkeiten haben, ihr Potenzial zu entfalten.

Die Kindergarantie ist im aktuellen Kontext der durch die COVID-19-Pandemie ausgelöste soziale und wirtschaftliche Krise besonders relevant. Tatsächlich hat die Krise die Notwendigkeit dringender und

langfristiger Investitionen in besonders vulnerable Kinder und den Schutz ihrer Rechte deutlich gemacht. Vor diesem Hintergrund kann die Kindergarantie einen Beitrag dazu leisten, die negativen Auswirkungen der Krise abzumildern, indem sichergestellt wird, dass bedürftige Kinder Zugang zu den essentiellen Dienstleistungen haben.

Die Kindergarantie hat daher das Potenzial, einen erheblichen Zusatznutzen und finanzielle Unterstützung für vulnerable Kinder im Allgemeinen und Kinder mit Behinderung im Besonderen zu bieten. Und zwar nicht nur für die Kinder selbst, sondern auch für ihre Familien und die Supportdienste. Es ist eine Gelegenheit, den Kampf gegen Kinder- und Familienarmut zu verstärken und die Umsetzung der UN-Kinderrechtskonvention weiter voranzutreiben.

Um diese Chancen zu nutzen und zu garantieren, dass alle Kinder mit den gleichen Chancen aufwachsen und qualitativ hochwertige Unterstützungsleistungen zur Verfügung haben, um sich zu entwickeln und an der Gesellschaft teilzuhaben, muss die Kindergarantie richtig gestaltet werden, um die angemessenen Instrumente zu schaffen, mit denen die besonders vulnerablen Kinder erreicht werden.

Dieser Bericht will einen Beitrag zur Gestaltung der Kindergarantie leisten, damit sie ihre Ziele erreichen kann. Zu diesem Zweck werden die Erfahrungen mit einem ähnlichen Instrument (d. h. der Jugendgarantie) untersucht, die Machbarkeitsstudie zur europäischen Kindergarantie und andere wichtige Veröffentlichungen eingehend studiert, die Meinungen von Akteuren betrachtet, die aufgefordert wurden, ihr Feedback in öffentlichen Konsultationen abzugeben, und schließlich die wichtigsten Ergebnisse dieser Untersuchungen mit einer Gruppe von Schlüsselakteure aus mehreren EU-Mitgliedstaaten diskutiert, um Ideen und Empfehlungen für eine erfolgreiche Umsetzung der Kindergarantie zu sammeln.



The main findings of report are presented below in the form of “key lessons” or “key takeaways”:

Clearly identify and obtain data from the target groups.

The first lesson learnt from the Youth Guarantee is that a clear picture of the target group in terms of size, characteristics, composition, needs as well as good quality, homogeneous, comparable, disaggregated data are needed if supporting schemes are to be successful and impactful.

Clarity regarding issues of size and definition of the target groups should be the first step of any intervention on children. To date, there is no clear picture of the situation of vulnerable children in the Member States due to the lack of quality, reliability, coverage, and limitations of the information/data available and, as a consequence, the total size of the population to be covered remains largely unknown. Thus, lack of clear targets and of child-specific data and indicators are major weaknesses that threaten the Child Guarantee and any intervention on children.

Whether the focus will be in all children, in the four groups of vulnerable children identified (i.e., children in institutions, children with disabilities, children with migrant background including refugees and children

living in precarious family situations) or in the groups chosen by the Member States according to their specific priorities, quality data and child-specific indicators are needed for a Child Guarantee scheme.

For children with disabilities, it is crucial to overcome the current severe lack of data both at EU and national level. Data on children with disabilities must be disaggregated by gender, age, kind of impairment, living in institution, at home, foster care. Moreover, a clear definition of disability is also needed.

Ensure access to high-quality, inclusive, affordable, and integrated services.

To avoid stigma and segregation of vulnerable children, services must be truly inclusive and of high quality. The issue of high-quality was a recurring theme in the Youth Guarantee. The low quality of the offers/services, the lack of a clear definition of what constitutes a good quality offer, and the absence of agreed quality standards may have hampered the effectiveness of the Youth Guarantee.

Access by children to key fundamental services (education, including early childhood education

and care, health, housing and nutrition) should be guaranteed through a twin-track approach consisting of universal mainstream services for all children and additional support services for the most vulnerable. Efforts have to be made to ensure that universal services for all children are developed in an inclusive way. Good-quality universal public services play a key role in ensuring all children have access to safety, opportunity and participation. In addition, vulnerable children may need specific additional or complementary services to meet their specific needs. Such specific services should not be seen as an alternative to accessing mainstream provision but as complementary and enabling.

To ensure high quality services, it is necessary to set up clear standards or criteria. The EU could contribute to develop EU-wide quality frameworks (like the European Quality Framework developed in the area of ECEC) and set common service standards, in order to guarantee high quality services in the five areas¹ and the Child Guarantee could promote the national application of these quality frameworks.

In some cases, access to services may be hampered by lack of awareness regarding the availability of the services. Also, in rural areas, the availability and accessibility of services is limited. Finally, although a service can be free, accessing it may involve additional costs which can act as barriers for children in vulnerable situations. It is therefore necessary to consider all the costs of accessing a service, and Member States should have policies to ensure that such costs do not act as an access barrier.

For children with disabilities, the integration of services is of paramount importance as they need integrated care and services involving different areas (e.g., education, health, social services) that fall under the responsibility of different entities. Ensuring integration of services through a holistic and coordinated approach is thus fundamental.

Not only access to services but also access to resources must be guaranteed.

Although ensuring access to services is key, ensuring that children and their families have access to resources and adequate income is likewise fundamental since income is often a prerequisite to enabling access to services.

The Child Guarantee must also contemplate measures for the families since child poverty is mainly a matter of family poverty and supporting children cannot be separated from supporting their families. Not considering the family situation will only result in short-term improvements but not in the end of poverty or social exclusion for the child².

Thus, Member States and the European Commission must set the implementation of the Child Guarantee in the wider context of tackling child poverty and social exclusion based on the comprehensive three-pillar approach advocated in the 2013 Recommendation on Investing in Children³. The Child Guarantee and the 2013 Recommendation must be closely linked.

Wider support must be ensured.

Other than free access to key services (health, education, ECEC, nutrition, housing and leisure activities) there are also other support areas that need to be tackled by the Child Guarantee:

Digital literacy: investing in programs that empower and protect children in the digital era. The Child Guarantee should encourage investment in digital literacy and comprehensive education (internet safety) to empower all children to navigate the digital world and make use of its opportunities without harm. Enabling them to access and to be capable to use these tools will contribute to better results in all policy areas of the Child Guarantee.

1 The 2019 Council Recommendation on high-quality ECEC systems, which includes a European Quality Framework, is an example that could be followed in other areas.
 2 Parents’ participation in the labor market in decent jobs, fair minimum wages, access to adequate unemployment benefit and minimum income, as well as non-stigmatizing in-kind support and tailored benefits are crucial components of preventing and tackling child poverty and social exclusion. This is particularly crucial in the context of COVID-19 which is generating increased child and family poverty and social exclusion due to reduced working, rising unemployment, low levels of income support and rising prices. <http://www.alliance4investinginchildren.eu/joint-statement-on-protecting-children-and-their-families-during-and-after-the-covid19-crisis/>
 3 1.access to adequate resources, 2.access to affordable good-quality services and 3. children’s right to participate in decision making.

Effective prevention and early intervention measures: to reduce inequalities at a young age and increase physical and mental health as well as cognitive and social skills, ensuring that children are better equipped to enter into adulthood.

Transition measures: to ensure a smooth passage from childhood to youthhood. The Child Guarantee should promote these measures in close coordination with the Youth Guarantee. There must be policy coherence between the Youth and the Child Guarantees and they must support and complement each other.

Mental health: increase efforts to focus on the mental health (psychological well-being) of vulnerable children.

Children with disabilities usually have more problems with access to services than other vulnerable children.

The recommendations and financial resources to emerge from the Child Guarantee must go towards making sure mainstream education is inclusive and accessible for children with disabilities, including digital learning. Emphasis should not only go towards increasing the accessibility of the physical settings and digital tools used to teach, but also towards training teachers and classroom assistants in fully including learners with disabilities in the mainstream classroom setting. Quality inclusive education must provide persons with disabilities with preparation for work life for participation in the open labor market. To ensure smooth transition from childhood to adulthood for children with disabilities, there should be coordination in the implementation of the Child Guarantee with the Youth Guarantee.

The Child Guarantee's focus on ECEC needs to pay particular attention to ensuring that children with disabilities are not left behind. The importance of assessing the child's development early on time through appropriate screening instruments is crucial. Especially in the case of children with disabilities, early detection of problems can make a difference. Member States must ensure access to quality early childhood development, care and pre-primary education, together with the provision of support and training to parents and caregivers of young children with disabilities. If identified and supported early, young children with disabilities are more likely to transition smoothly into pre-primary and primary inclusive education settings.

For children with disabilities (and their families), access to personal assistance is fundamental. Personal assistance is a key instrument for independent living which ensures that children are supported to grow up in a family and

prevents institutionalization. In addition to personal assistance, families should also have access to technical aids and equipment such as wheelchairs, hearing aids, communication aids. To this end, the Child Guarantee can encourage Member States to use the European Social Fund (ESF+) to pilot or expand personal assistance for children with disabilities and their families. ERDF could be used to improve access of children with disabilities to technical aids and equipment, as well as for housing adaptations to make family apartments and houses fully accessible, and to prevent children from being placed in institutions because of inaccessible homes (see also the takeaway: "Make better use of EU funding opportunities").

Ensure decent salary, fair working conditions and continuous professional staff development.

This should be guaranteed for all the staff working with children in vulnerable situations.

In the case of children with disabilities, the professionalism of the staff becomes even more important. In some member states the staff does not have the skills to work with children with disabilities; they are not trained to create inclusive environments or to interact/cater for the need of children with special needs. The lack of qualifications of the professional staff in the ECEC and education sectors is also a barrier to access services for children with disabilities.

Adequate governance structures and funding allocation

One of the lessons learnt from the experience of the Youth Guarantee was the importance of having an adequate governance and appropriate resources, combining both EU and national funding. To be effective and successful, the fight against child poverty and exclusion must be a political priority. The Child Guarantee, under the form of a Council Recommendation, is a more powerful policy instrument to ensure stronger commitment at member state level than the 2013 EC Recommendation Investing in Children, which lacked support and implementation at national level.

Governance must ensure the development of integrated, comprehensive and strategic action plans/frameworks. This means developing national (and where appropriate regional/local) plans/strategies that emphasize a multidimensional, holistic approach – with a strong focus on coordination and cooperation between services and effective outreach to children in vulnerable situations.

Such plans should be coordinated at the highest level (e.g., prime minister of national/regional government) in order to give them high visibility and effective coordination. It is therefore necessary to improve coordination at all levels of governance between national, regional and local child policies. Since the needs of children in vulnerable situations and their families are often complex, multiple, and cut across different policy areas, the issue of coordination becomes of paramount importance. However, too often the delivery of policies is in policy 'silos', and there is a lack of coordination and cooperation between policy providers to ensure that their policies are mutually reinforcing and delivered in an integrated way at local level.

The allocation of funding must be adequate. The Child Guarantee is an instrument to trigger national investments. National budgets can be complemented with resources from the EU to combat child poverty and exclusion.

Make better use of EU funding opportunities.

Suggestions to ensure an appropriate allocation of funds for the Child Guarantee include making support for children in vulnerable situations a specific priority for the 2021- 2027 funding period and better mobilizing all EU funds and financial instruments (i.e., the ESF+, the ERDF, AMF, EIB, InvestEU, Structural Reform Support Program (SRSP), the Recovery and Resilience Facility, Next Generation EU and Erasmus+), combining them to support different aspects (e.g., combine ERDF and ESF+ funding to establish early-care centres and provide services to the children). With respect to ESF+, earmarking a specific minimum percentage of ESF+ funding to be used for supporting children in vulnerable situations is being evaluated⁴.

Funding and support to Civil Society Organizations (CSOs) that run projects aligned with national strategies to reduce child poverty in line with the Child Guarantee should also be provided.

When dealing with children with disabilities and EU funds, it would be important to include a mention of the UNCRPD in the enabling conditions and to avoid misuse

of funds, insist on greater clarity and further provisions in the regulations governing EU funds so that accessibility, social inclusion, and deinstitutionalisation are prioritized when devising EU-funded measures for children with disabilities. Also make sure that funding is not used in ways that are inconsistent with obligations under the UNCRC and UNCRPD and set up an independent budget line to guarantee that structured dialogue across institutions, agencies, and bodies includes meaningful consultation with and the participation of children with disabilities.

Foster collaboration and partnering with key stakeholders.

Collaboration and partnerships with key stakeholders are crucial to gain political support, develop adequate policies and ensure monitoring. The experience from the Youth Guarantee highlighted the need to have in place efficient coordination and collaboration mechanisms among key stakeholders (including governments, social partners and the civil society) to ensure the proper implementation of the measures and services.

Therefore, for policies/measures to combat child poverty and exclusion to be successful, coordination and cooperation at all levels⁵ must be ensured. In addition, children, parents and CSOs - including service providers - should be consulted at all stages of the Child Guarantee development (not only ad hoc consultation during the conception phase of the Child Guarantee but also consultation on the design, implementation and monitoring phases should be foreseen in the multi-annual national strategies and action plans).

In the case of children with disabilities, the voices of children, parents, family associations, organizations focused on disability and service providers are fundamental and should be heard in all decision-making processes that affect their lives at local, national and EU level. The involvement of children with disabilities must be taken into account very seriously and consultation should be mandatory. It is not only an obligation coming from CRPD art. 7.3 (the rights to express their view but also the right to be heard) but it is also a positive action against children with disabilities' discrimination.

⁴ The proposal to earmark 5% of the ESF+ resources to child poverty in every EU Member State has not yet been approved by the Council and negotiations are still going on.

⁵ at EU level, by involving several DGs (Education, Employment, Health, Eurostat...); at policy/national level, by involving the different ministries and related policies and creating a comprehensive approach (welfare, health, education, social policies, labor market, employment, fiscal policies...); at regional/local level, by involving key stakeholders (children, parents, professional actors in childcare and education, CSOs, service providers...)

Make sure the Child Guarantee is aligned with other EU initiatives.

As in the Youth Guarantee, also for the Child Guarantee it will be important to create synergies with other European initiatives, like the European Semester, the Minimum Income Framework, the EPSR, the EU Disability Strategy post 2020, and of course with the (Reinforced) Youth Guarantee itself. The alignment between the two guarantees will ensure policy coherence and mutually reinforcing support. The Child Guarantee strategies and action plans also have to be aligned with the UNCRC as well as with the UNCRPD, which have been ratified by the EU.

For people with disabilities, linking the Child and the Youth Guarantee could be useful for example, in relation to education and early drop-out, to further identify and reach young people in need of support and also to improve the transition between education and work for young people with disabilities.

Put in place an efficient monitoring mechanism.

So far, Member States have not always been able to properly implement and monitor existing child-related provisions. To ensure that the Child Guarantee is successful, proper implementation and monitoring are key. An effective monitoring system must be an integral part of the Child Guarantee instrument. It is necessary to regularly monitor policies/ services once they are in place to ensure that they are efficiently and effectively delivered, they are of a high quality and

are effective in ensuring access to them by children in vulnerable situations. Thus, transparent systems need to be put in place for regularly inspecting services and also to develop effective complaints procedures when parents and children have problems with accessibility or with the quality of services.

The Child Guarantee can support Member States to: (i) make full use of existing statistics and administrative data and reinforce/improve their statistical capacity (including disaggregated data by different vulnerable groups) to monitor the impact of policies on children and their families; (ii) organize systematic ex ante assessments of the potential impact of future policies on children – particularly those belonging to vulnerable groups (e.g. children with disabilities) ; (iii) build on the added value of comparability and the exchange of good practice and lessons learned; and (iv) include those who are most affected by the system in monitoring mechanisms (i.e. children, parents, CSOs, disabled person organizations, and civil society).

Monitoring must be a compulsory exercise with well-defined impact criteria and indicators. The EC could put together a comprehensive monitoring framework where every year priorities and how targets are met are monitored. There should be common child-specific indicators (other than AROPE - At Risk Of Poverty or social Exclusion indicator) to ensure that all actions to combat child poverty and exclusion are aligned. In addition, results from the monitoring exercise should also feed other initiatives like the EU Semester, the EPSR, etc.

1. Introduction

Child poverty is one of the biggest challenges Europe is currently facing. According to the latest Eurostat data, in 2018 24.3% of the population aged 0 to 17 years were at risk of poverty or social exclusion in Europe⁶. Due to migration, economic hardship, disability, discrimination and the current socio-economic crisis caused by the COVID-19 pandemic, many families are struggling to make ends meet. Children are the first to suffer and the consequences will be felt for many years to come⁷. Acknowledging that children growing up in poverty and social exclusion are less likely to do well in school, enjoy good health and realise their full potential in life, and are more likely of becoming unemployed, poor and socially excluded in their adulthood, the EU has committed to supporting the eradication of child poverty by adopting a Child Guarantee in 2021, to ensure that children in the most vulnerable situations have access to key social rights⁸.

The Child Guarantee will be particularly relevant in current context of socio-economic crisis brought about by the COVID-19 which has exacerbated the existing inequalities in accessing vital goods and services such as housing, food, healthcare, social and protection services and has also led to a sharp rise in violence against children, child neglect and abuse. Before the pandemic, one in four children in the European Union were already growing up at risk of poverty and social exclusion. According to recent projections, the global socioeconomic downturn caused by the sanitary crisis could push 117 million more children worldwide into monetary poor households. Therefore, in the absence of effective long-term mitigating policies, the total number of children affected by poverty could very quickly reach over 700 million⁹.

In this scenario, the Child Guarantee can help mitigate the dramatic consequences of the crisis on vulnerable children as well as on their families and communities by ensuring that children in need have access to essential services.

Thus, the Child Guarantee has the potential to bring substantial added value and financial support to vulnerable children in general and to children with disabilities, in particular. And not only to the children themselves but also to their families and the services that support them. To be successful, the Child Guarantee has to be properly designed to put in place the appropriate tools that will reach the most vulnerable children.

The aim of this report is to contribute to the shaping of the Child Guarantee to make it impactful so that it can reach its objectives. It will do so by reviewing the experience of a similar instrument (i.e. the Youth Guarantee), by diving deep into the feasibility study on the Child Guarantee and other key publications, by looking into the opinions of stakeholders that have been invited to give their feedback in public consultations and finally, by discussing the main findings of this exercise with a group of key stakeholders from different EU Member States to collect their ideas and recommendations for a successful implementation of the forthcoming Child Guarantee.

Learning from the experience of other (similar) models like the Youth Guarantee might be helpful in identifying the right characteristics the Child Guarantee should have to reach its objectives. Therefore, this research work looks into the characteristics the Child Guarantee should have to best support the delivery of high-quality, family-centred support services for children in need in general and also for children with disabilities in particular, on the basis of the lessons learnt from:

6 https://www.issa.nl/content/eu-child-guarantee-presents-opportunity-cannot-be-missed#_ftn1

7 <https://www.euractiv.com/section/economy-jobs/opinion/european-child-guarantee-can-be-eus-answer-to-child-poverty/>

8 <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12565-European-Child-Guarantee->

9 <https://data.unicef.org/topic/child-poverty/covid-19/>

The Youth Guarantee – Evaluations, assessments, success and failure factors reports.

The Feasibility Study on the Child Guarantee (2020) which focused on 4 disadvantaged groups (children in institutions, children with disabilities, migrant/refugee children and children living in precarious family situations) & 5 key policy/service areas (healthcare, education, childcare and early education, housing and nutrition- which constitute children's social rights).

Other publications (the 2013 EC's Recommendation on Investing in Children & Implementation reports; the 2020 EC Roadmap Communication on Delivering for children: an EU strategy on the rights of the child; the Council recommendation and Staff Working paper on high quality (2018); the report on EC Activation measures for young people in vulnerable situations, Social Europe (2018); the EC SWD (2020) European Disability Strategy evaluation report).

The feedback received to the EC's Consultation on the Child Guarantee (2020) (83 contributions from NGOs, public authorities, associations¹⁰).

The feedback received from key stakeholders from different EU member states involved in Focus Groups and interviews carried out by the Research Team in December 2020.

The current document is structured in 9 sections:

An executive summary

Chapter 1, an introductory chapter which presents the report and the background context in which the Child Guarantee emerged.

Chapter 2, which reviews the available literature on the Youth Guarantee scheme shedding light into the main challenges, areas of improvement and lessons learnt from its implementation which constitute valuable insights to take into account in the design/definition of the upcoming Child Guarantee.

Chapter 3, which presents the results of the feasibility study carried out on the Child Guarantee and examines in detail each support service (healthcare, education, including early childhood education and care, housing and nutrition) highlighting the main barriers and challenges to access these services for vulnerable children in general and for children with disabilities in particular. Also suggested actions/recommendations to overcome the barriers are presented in this chapter.

Chapter 4, which presents an overview of the use of EU funding to support the Child Guarantee and provides insights on how to use EU funds in the specific service areas.

Chapter 5, which gathers and integrates the knowledge from previous chapters and summarizes it into 5 key areas (target group, access to services and adaptability, governance and resources, collaborative approach and synergies and monitoring) that were open to discussion with a group of key stakeholders to gather their views and suggestions.

Chapter 6 presents the conclusions.

A final section collects the references used for the study and

the Annex presents the methodology used in the Focus Groups and in the interviews.

1.1 The background context of the Child Guarantee¹¹

Child poverty, social inclusion and promotion of children's rights are issues that have become increasingly important in EU policy due to the increased status given to children's rights and to the fight against poverty and social exclusion since the entry into force of the Lisbon Treaty¹², which has made the EU Charter of Fundamental Rights (CFR) legally binding¹³.

The inclusion of a specific target for reducing the number of people at risk of poverty or social exclusion in the 'Europe 2020' strategy has further helped to increase the focus on those at risk, including children.¹⁴

The EU Recommendation 'Investing in children: breaking the cycle of disadvantage', proposed by the European Commission¹⁵ (February 2013) and endorsed by the EU Council of Ministers (July 2013), has provided a clear framework for the Commission and EU Member States to develop policies and programs to promote the social inclusion and well-being of children, especially those in vulnerable situations¹⁶.

More recently, the adoption of a European Pillar of Social Rights (EPSR), which was jointly proclaimed by the European Parliament, the Council of the EU, and the European Commission on 17 November 2017, and in particular Principle 11: "*Children have the right to affordable early childhood education and care of good quality. Children have the right to protection from poverty. Children from disadvantaged backgrounds*

have the right to specific measures to enhance equal opportunities", reinforces the importance of promoting children's rights¹⁷.

It is also important to note that all Member States have ratified the United Nations Convention on the Rights of the Child (UNCRC)¹⁸ and this Convention should thus guide national and (sub)national policies and measures that have an impact on the rights of the child.

In addition, although the EU has not ratified the UNCRC, the 2013 EU Recommendation on investing in children specifically states that: "*The standards and principles of the UNCRC must continue to guide EU policies and actions that have an impact on the rights of the child*".

However, despite of the growing political commitment to promoting children's rights and well-being, as well as the stronger legal framework and clearer policy guidance, progress has been slow.

Although there have been some recent reductions in levels of risk of poverty or social exclusion in those Member States where it is highest, high levels of child poverty and social exclusion still persist in many EU Member States, particularly for some groups of children.

Recent studies on the implementation of the 2013 EU Recommendation, by the European Commission¹⁹ and the European Social Policy Network (ESPN)²⁰, highlight

11 The content from this section has been adapted from EC (2020) Feasibility Study for a Child Guarantee. Final Report (March 2020). <https://op.europa.eu/en/publication-detail/-/publication/c312c468-c7e0-11ea-adf7-01aa75ed71a1/language-en>

12 On 1 December 2009

13 <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:12012P/TXT>

14 European Commission (2010). Europe 2020: A strategy for smart, sustainable and inclusive growth, COM(2010) 2020, Brussels: European Commission. Marlier E. and Natali D., with Van Dam R. (eds) (2010), Europe 2020: Towards a more social EU?, Brussels: P.I.E. Peter Lang.

15 European Commission (2013), Investing in Children: Breaking the cycle of disadvantage, Recommendation (2013/112/EU), Official Journal of the European Union, L 59/5.

16 Ibidem

17 https://ec.europa.eu/commission/priorities/deeper-and-fairer-economic-and-monetary-union/european-pillar-social-rights/european-pillar-social-rights-20-principles_en

18 UN General Assembly (1989), Convention on the Rights of the Child, United Nations.

19 European Commission (2017), Taking Stock of the 2013 Recommendation on 'Investing in Children: Breaking the cycle of disadvantage', SWD(2017) 258 final, Brussels: European Commission.

20 Frazer H. and Marlier E. (2017), Progress across Europe in the Implementation of the 2013 EU Recommendation on 'Investing in Children: Breaking the cycle of disadvantage': A study of national policies, European Social Policy Network (ESPN), Brussels: European Commission.

10 <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12565-European-Child-Guarantee->

the fact that much more needs to be done to ensure its effective implementation. According to these studies, the 2013 Investing in Children Recommendation lacked support and implementation at national level. Thus, a stronger policy instrument, under the shape of a Council Recommendation, would help hold Member States accountable to its realization.

In this context, on 24 November 2015 the European Parliament voted for a proposition to combat child poverty and social exclusion, and to ensure the effective implementation of the 2013 EU Recommendation on investing in children, through the implementation of a “Child Guarantee”. Subsequently, in its 2017 budget, the Parliament requested the Commission to implement a preparatory action – entitled ‘Child Guarantee Scheme/ Establishing a European Child Guarantee and financial support’.

According to the budgetary remarks of the European Parliament attached to the aforementioned preparatory action, the action should make sure that every child in Europe at risk of poverty has access to free healthcare, free education, free childcare, decent housing and adequate nutrition. *“By covering these five areas of action through European and national action plans one would ensure that the living conditions and opportunities of millions of children in Europe improve considerably and with a long-term perspective”*.²¹

In response, the EC decided to commission a feasibility study focusing on four specific groups of vulnerable children that are known to be particularly exposed to poverty and exclusion: children residing in institutions, children with disabilities, children with a migrant background (including refugee children) and children living in a precarious family situation. The objective of the Feasibility Study on the Child Guarantee was to provide a thorough analysis of the design, feasibility, governance, and implementation options of a possible future CG scheme in the EU Member States, based on what is in place and feasible for the four groups of particularly vulnerable children. The final report²² was delivered in March 2020 and gathers all the findings from several activities carried out by the research team and country experts²³. Following the publication of the feasibility study, the European Commission launched a consultation which ran until October 2020 seeking the views and insights from key stakeholders (national/local administrations, service providers, citizens and civil society). The main findings and recommendations of the Feasibility Study are presented in Chapter 3 of this document. The main findings from the EC consultation to stakeholders are presented in Chapter 5 of the current document, together with the findings from the literature review on the Youth Guarantee and the views from the experts consulted by the Research Team.

2. Lessons learnt from the Youth Guarantee scheme

This section presents the Youth Guarantee scheme that was launched in 2014 by the European Commission. It reviews the available literature on the Youth Guarantee shedding light into the main challenges, bottlenecks,

and areas of improvement. The identification of what worked and what did not work, will constitute valuable insights that will help in the design/definition of the upcoming Child Guarantee.



21 Item 04 03 77 25 in Annex 3 to budgetary remarks on pilot projects/preparatory actions in the 2018 budget

22 EC (2020) Feasibility Study for a Child Guarantee. Final Report (March 2020). <https://op.europa.eu/en/publication-detail/-/publication/c312c468-c7e0-11ea-adf7-01aa75ed71a1/language-en>

See also: -EC (2019) Feasibility Study for a Child Guarantee- Children voices: Learning and conclusions from four consultations with children.

-EC (2019): Feasibility Study for a Child Guarantee Case studies on the effectiveness of funding programs. Key findings and study reports

-EC (2019): Feasibility Study for a Child Guarantee Target Group Discussion Paper on Children in Alternative Care

-EC (2019): Feasibility Study for a Child Guarantee Target Group Discussion Paper on Children living in Precarious Family Situations.

23 The Final Report summarizes the results from:

28 Country Reports;

1 report on each of the five key children’s social rights (or policy areas identified by the European Parliament: 1. free healthcare, 2. free education, 3. free early childhood education and care, 4. decent housing and 5. adequate nutrition);

1 report on each of the four TGs singled out by the European Commission (children residing in institutions, children with disabilities, children with a migrant background and children living in a precarious family situation);

1 online consultation with key stakeholders;

8 case studies highlighting lessons from international funding programs;

4 consultations with children (focus groups);

4 fact-finding workshops that took place in September and October 2019 (one on each TG); and

1 conference.

2.1 The Youth Guarantee - Background context

The great recession of 2008/2009 increased the urgency of many labour market related policy issues at a global, European and national level. Among critical issues, youth unemployment was one of the most important ones due to its potentially long-lasting impacts and damaging effects on young individuals that could ultimately result in a “lost generation” incapable of catching up later in life²⁴.

The Youth Guarantee arrived at a moment when an urgent and radical response was needed. In 2013, youth unemployment reached 23.7% in EU-28 meaning that more than 5.5 million youth aged 15 to 24 were unemployed in that year. At the same time, nearly 14 million young people (13%) were neither in employment, education or training – the so-called NEETs²⁵. This situation threatened the economic recovery and put the European model of social wellbeing in grave danger. It also brought long-lasting detrimental consequences on youth unemployment, such as permanent future income losses, skills erosion and the increased risk of discouragement and inactivity.

In this worrying situation, a number of EU initiatives were launched since 2010, among which, the European Youth Guarantee which was launched in 2014 with a broad support from all stakeholders, including governments, social partners and the civil society.

The European Youth Guarantee, formally launched on 1 January 2014, is “a commitment by all Member States to ensure that all young people under the age of 25 years receive a good quality offer of employment, continued education, apprenticeship or traineeship within a period of four months of becoming unemployed or leaving formal education” (European Commission, 2016).

The Youth Guarantee is one of the most innovative labour market policies of the last few decades, not

only in terms of its design, but also in terms of the institutional courage needed to adopt such a forceful response and the commitment made by all stakeholders to reach agreements. The European Youth Guarantee is therefore a commitment by Member States to guarantee that all young people under the age of 25 receive, within four months of becoming unemployed or leaving formal education, a good quality work offer to match their skills and experience; or the chance to continue their studies or undertake an apprenticeship or professional traineeship. Therefore, in its design, the Youth Guarantee combines the concept of guarantee, with a maximum period for countries to take action, and the notion that effective activation measures have to be comprehensive in nature. The “guarantee” aspect of the Youth Guarantee programmes evokes a rights-based concept, which can affect participants differently than traditional public policies based on the utilitarian view. It can be viewed as an EU-wide framework comprising a system of measures to be taken by each Member State. The wide variety of measures includes:

- i) education and training for employment programs
- ii) remedial education school dropout measures
- iii) labour market intermediation services; and
- iv) active labour market policies (ALMPs) aimed to affect labour demand, such as direct employment creation, hiring subsidies, and start-up incentives.

Youth Guarantees are not a new instrument. They had been used in the past by Nordic countries (see Box 1) and later on by the UK. Experiences from these countries showed that these policy measures, if successfully implemented, usually involve adjustments of active labour market policies (ALMPs) and require broad structural reforms of vocational education and training systems, general education systems and public employment services.

Box 1 | Past Youth Guarantees in Europe²⁶

Youth guarantees emerged in the 1980s and 1990s in the Nordic countries, which have been pioneers in the implementation of active labour market policies. Sweden introduced the first youth guarantee in 1984, followed by Norway in 1993, and Denmark and Finland in 1996. In the UK, the British New Deal for Young People was established in 1998. More recently, other countries embarked on similar programmes, such as the Austrian Ausbildungsgarantie and the Flemish Jeugdwerkplan, launched in 2008 and 2007, respectively. A common feature among these first youth guarantee experiences was the ability to provide a wide range of activation measures, which could be combined in different ways to tailor the particular needs of young participants. Likewise, these pioneering initiatives shared the universality principle and the fact that they targeted young people below the age of 25²⁷. These initiatives diverged, however, in terms of their particular focus: while the youth guarantees implemented in Finland, Norway and Sweden had a particular focus on improving the educational trajectories of their participants, there was a greater emphasis on apprenticeships in the case of the Austrian and Danish programmes²⁸. Relative to today’s European Youth Guarantee, although these pioneering experiments differed in several respects, they had some common features: (i) the emphasis on the preparation of customized plans based on the needs of the youth out of employment and education; (ii) the central role played by the Public Employment Systems (PE) in the provision of such a customized approach; and (iii) the fact that these programmes were already grounded on the principle of guaranteeing the unemployed youth an employment, academic or vocational training opportunity. While these first youth guarantees have been modified by various reforms over the last few decades, they effectively reduced youth unemployment even during the crisis of the 1990s (notably the Nordic experiences).

The Youth Employment Initiative, together with significant dedicated investments by the European Social Fund were the key EU financial resource to support implementation of the Youth Guarantee on the ground for the 2014-2020 programming period.

The implementation of the European Youth Guarantee at the national level has not always been easy. Youth Guarantees are not simply adjustments to ALMPs already in place; their proper implementation often requires the creation or reform of vocational training schemes, education systems and public employment services (PES). In addition, they are very costly measures. Moreover, the success of these programmes is based on their ability to build cooperative agreements with employers’ organizations, trade unions, schools and training centres and non-governmental organizations, which can often be laborious and time consuming.

Despite the Youth Guarantee has created opportunities for young people and has had a major transformative effect, acting as a powerful driver for structural reforms and innovation (in about seven years’ time, just before the COVID-19 pandemic, there were approximately 1.7 million fewer young people neither in employment nor in education or training (NEETs) across the EU and youth unemployment had dropped to a record low of 14.9% by February 2020²⁹), however, the implementation of the Youth Guarantee at national level has widely differed across countries and the evaluations carried out have highlighted areas of concern to be improved and lessons to be learnt that can also be useful for the Child Guarantee.

Although it is out of the scope of this research, the lessons learnt will also be useful, especially in view of the approaching “Reinforced Youth Guarantee” that will come to support young people in the current unprecedented crisis brought about by the COVID-19 pandemic.

24 Cahuc et al., 2013; Schmitten and Umkehrer, 2013 in Eichhorst, W., & Rinne, U. (2017). IZA Policy Paper No. 128: The European Youth Guarantee: A Preliminary Assessment and Broader Conceptual Implications. IZA Institute of Labor Economics.

25 Cahuc et al., 2013; Schmitten and Umkehrer, 2013 in Eichhorst, W., & Rinne, U. (2017). IZA Policy Paper No. 128: The European Youth Guarantee: A Preliminary Assessment and Broader Conceptual Implications. IZA Institute of Labor Economics.

26 OECD. (2015). Local implementation of youth guarantees: Emerging Lessons from European Experiences

27 With the exception of the Danish program that extended eligibility up to age 30.

28 OECD. (2015). Local implementation of youth guarantees: Emerging Lessons from European Experiences.

29 <https://ec.europa.eu/social/main.jsp?catId=1079&langId=en>

2.2 Main outcomes of the Youth Guarantee evaluations

In order to facilitate the analysis, the results from the evaluations have been grouped in 6 broad areas, namely:

1. Target group
2. Service offer
3. Governance
4. Resources
5. Collaborative approach
6. Monitoring and evaluation

Clearly identify the target group (NEETs). Although the first evaluations of the Youth Guarantee showed encouraging results (-1,4M unemployed: -700k NEET)³⁰, NEETs rates reductions were driven by a fall in unemployed rather than inactive NEETs^{31 32}. Evaluations reports concluded that a more efficient identification of beneficiaries and outreach would be required³³, as well as strengthening outreach to NEETs not registered with the public employment services³⁴, while heterogeneity should be taken into account³⁵.

As mentioned in a study carried out by Eurofound³⁶, there is a wide diversity within the population of young NEETs. While for some young people being NEET is a temporary status, for others it can be a symptom of disadvantage and indicate disengagement from society as a whole. About half of the NEET population are economically inactive and not looking for a job, with large variations across Member States. This can result

from a variety of factors, including family responsibilities and health or disability issues but also discouragement and a lack of incentive to register as unemployed. Young people's background is a determining factor. Providing tailored solutions to a diverse group of young people and making NEETs with complex needs a key target group proved to be a novelty and a challenge in several Member States. Thus, a fundamental challenge of the Youth Guarantee was how to place the needs of vulnerable young people at the heart of programme design. Vulnerable young people have varied, complex needs for whom measures solely aimed at increasing employability might be insufficient. They require a variety of professional assistance and additional sociological/psychological support to overcome the barriers they face. Personalised and intensive intervention can be resource intensive and expensive to provide. In addition, some of the most marginalised young people are not in contact with any official/state systems, making them hard to locate and connect with. Vulnerable young people can be initially sceptical of "official organisations" and, due to a lack of trust, are reluctant to engage. Bureaucratic structures and official language is something they are not familiar with and find it difficult to understand.

In practice, despite significant efforts, the most vulnerable young people were under-represented among the beneficiaries of the Youth Guarantee³⁷. Youth Guarantee interventions often remained insufficiently adapted to the needs of those facing multiple barriers, such as poverty, social exclusion,

disability and ethnic discrimination. This was the result of a number of factors, including a limited knowledge of the diversity of the NEET population and the specific needs of different NEET groups, as well as the lack of low threshold offers, insufficient geographical coverage and the complexity of registration procedures. In this context, outreach measures and measures to retain and support young people are fundamental.

Therefore, the EU and its Member States need to gather more data on young people in NEET situations. Such data should be disaggregated according to the various sub-groups forming the NEET population, in order to both gain a better understanding of the specific obstacles they have to overcome and use it to implement targeted measures and outreach strategies based on the specific needs of each sub-group.

In France, some authors³⁸ suggested that the mismatch between the training provided in the framework of the Youth Guarantee and the social situation and skill needs of participants, risks disengaging them rather than reinforcing their linkages to the programme.

An interesting positive example is the "*Ung Komp*" initiative in Sweden, which uses multi-skilled teams, and a single point of contact/location to best meet the needs of vulnerable young service users. The initiative focuses on pro-active interventions to address the complex issues faced by vulnerable, and often poorly motivated, young people, before they are embarked on further steps towards labour market integration³⁹.

An approach to integrated service delivery has been developed in Croatia through Centres for Lifelong Career

Guidance (CISOKs). CISOKs were established in 2013 to provide individual and tailored services to young people, based on their individual needs. Each centre provides a mix of different services (i.e., self-help, staff assistance, and individual guidance)⁴⁰.

Regarding awareness and outreach, more needs to be done. Although there are inspiring projects across Europe, often the general public is not aware that they are part of the Youth Guarantee. There is still room for improvement to build the Youth Guarantee as a well-known pan-European brand. Institutions such as PES, police, probation officers, mobile youth workers, sport associations, schools, youth organisations, NGOs, social partners, public institutions including health and social security institutions, can play an important role in developing or enhancing outreach and awareness-raising strategies, for example in supporting the identification of those at risk of becoming NEETs, reaching out directly to young people, or exchanging information and research. Furthermore, both outreach and service delivery need to be easily accessible. Services should be designed in collaboration with young people. Youth-friendly language as well as communication channels used by young people should be applied.

Enhance the quality of the offers and services. The EC and social partners recommend ensuring good quality offers and services^{41 42 43 44}. Wide variations were found among Member States as regards the quality of offers and their outcomes⁴⁵. Even a definition of good quality offer is lacking, which may hamper the effectiveness of the Youth Guarantee⁴⁶. Moreover, there is a relatively low prominence of apprenticeship and education offers

30 According to EC Communications and Working Documents along 2014-2016 unemployment rates and unemployed NEET rates dropped comparatively more for young people than for the adult population in many Member States (European Commission, 2016a, 2016b), although some study argue that this ratio has remained rather constant since the implementation of the European Youth Guarantee (Eichhorst & Rinne, 2017).

31 European Commission. (2016a). STAFF WORKING DOCUMENT. The Youth Guarantee and Youth Employment Initiative three years on.

32 Eichhorst, W., & Rinne, U. (2017). IZA Policy Paper No. 128: The European Youth Guarantee: A Preliminary Assessment and Broader Conceptual Implications. IZA Institute of Labor Economics.

33 European Commission. (2016a). STAFF WORKING DOCUMENT. The Youth Guarantee and Youth Employment Initiative three years on.

34 European Commission. (2016b). EC (2016) Commission Communication 'The Youth Guarantee and Youth Employment Initiative three years on.

35 Council of the European Union. (2016). Draft Council Conclusions on the implementation of the Youth Guarantee and the Youth Employment Initiative.

36 Eurofound (2016) Exploring the diversity of NEETs, Publications Office of the European Union

37 COM (2016) 646 final: The Youth Guarantee and Youth Employment Initiative three years on.

38 Loison-Leruste M., Couronné J., Sarfati F. 2016. La Garantie jeunes en action: Usages du dispositif et parcours de jeunes, Rapport de recherche No. 101, Centre d'études de l'emploi et du travail, Paris, In ILO 2017: The European Youth Guarantee: A systematic review of its implementation across countries.

39 EC (2017) Youth Guarantee Learning Forum Report

40 EC (2017) Youth Guarantee Learning Forum Report

41 European Commission. (2016a). STAFF WORKING DOCUMENT. The Youth Guarantee and Youth Employment Initiative three years on

42 European Commission. (2016b). EC (2016) Commission Communication 'The Youth Guarantee and Youth Employment Initiative three years on

43 Council of the European Union. (2016). Draft Council Conclusions on the implementation of the Youth Guarantee and the Youth Employment Initiative

44 OECD (2015). Local implementation of youth guarantees: Emerging Lessons from European Experiences

45 European Commission. (2016a). STAFF WORKING DOCUMENT. The Youth Guarantee and Youth Employment Initiative three years on.

46 European Court of Auditors. (2015). EU youth guarantee: first steps taken but implementation risks ahead, report by the Court of Auditors.

and the Youth Guarantee potential to up-skill young people can be improved⁴⁷. Besides, more personalised guidance and counselling services for the youth are needed, especially in transition phases⁴⁸, providing mobility grants is recommended, as well as a right timing of intervention⁴⁹.

The quality aspect is particularly important, as young people are more often in non-standard and precarious forms of employment compared to other age groups. Young people are also more often overqualified for the jobs they do. At the same time, youth employment is highly sensitive to macroeconomic and labour market conditions. Many young people have been hired temporarily in low quality jobs and are thus at higher risk of entering a precarious cycle and repeatedly returning to NEET status.

Although there is no common definition of a 'good-quality offer' under the Youth Guarantee, however, it is generally recognised that an offer is of good quality if the person who benefits from it achieves sustainable labour market attachment (e.g., does not return to unemployment or inactivity thereafter).

Moreover, "quality" must be interpreted as a broad concept. It starts with the specific characteristics of the offer, but also includes the need to support young people, particularly the most vulnerable, with adequate counselling, supervision and guidance before, during and after their placement. Placements must also match the needs, interests and competences of young people, leading to real opportunities.

Given the current lack of clearly defined quality standards, too many young people are offered one-size-fits all solutions, based on the misleading assumption

that "any job is better than no job". Moreover, the social and labour rights of young people participating in the Youth Guarantee scheme were often not respected or protected (e.g., young people received lower salaries and did not have access to social protection)⁵⁰.

Ensuring better quality of offers still remains a common challenge of the Youth Guarantee. The quality of offers highly depends on the capacity of Public Employment Services (PES) to engage with employers, improve the provision of career guidance and work closely with schools, and the existing strength of the Youth Guarantee network, which varies across Member States. A suitable balance needs to be struck between short-term work assignments, if these form part of essential and sustainable activation programmes, and long-term work outcomes and aspirations. In some cases, young people find work through Temporary Work Agencies, which can be a good steppingstone towards full employment if they are part of an overall career plan. Likewise, dual learning approaches can be very beneficial, especially as part of well-constructed apprenticeship programmes. Standards need to be put in place for quality of offers and monitoring. Young people themselves should be involved to assess the quality of the Youth Guarantee offers.

Governance. The European Commission recommends the full implementation of the Youth Guarantee in the national systems⁵¹. Full implementation is still recent or pending in several Member States⁵², while many Member States are not well-prepared to implement it successfully⁵³. Moreover, sustainable implementation could be jeopardized by changes in governments and policy priorities, in fact political commitment is needed for such a structural reform⁵⁴.

The Youth Guarantee has facilitated the implementation of structural reforms⁵⁵, indeed Active Labour Market Policies (ALMPs) such as the ones implemented under the Youth Guarantee require structural reforms in basic services such as VET, education or employment services⁵⁶. However, the Youth Guarantee as driver of change widely differs among Member States⁵⁷.

An important problem that arose during its implementation is the need for an adequate capacity of public employment services (PES)⁵⁸ while enhanced internal coordination and strengthened capacities and collaboration among stakeholders are needed (PES, education, VET)⁵⁹. Many different policy areas should be addressed simultaneously and systematically⁶⁰.

Regarding the role played by PES (Public Employment Services), evidence points to the role of properly staffed (in terms of both numbers and competencies) PES capable of offering customized support to different groups and effectively managing the range of services offered under Youth Guarantee programmes. The evaluation of the pilot period of the "New Deal for Young People" programme in the UK found that at

least one fifth of the positive effect of the programme on employment outcomes was due to the job search assistance and individualized support provided by the PES office⁶¹. In the case of the Youth Guarantee programmes implemented in France, it was found that the highest positive effect found within the first three months of participation in the programme, can be attributed to the high intensity of the counsellor's support during that first phase⁶². In the same line, it was found that the success of the Youth Guarantee will rely on the counsellors' provision of an intensive support, which is adapted to the target population. This is fundamental as this population is often characterized by its lack of employment and skills, as well as by a number of social, academic, economic, physical and psychosomatic handicaps⁶³.

Resources. The Youth Guarantee is a costly measure that requires structural reform and therefore substantial investment⁶⁴ ⁶⁵ and sufficient human and financial resources should be ensured⁶⁶. The EU provided considerable financial support to finance the process⁶⁷ and the financial support provided through the European Social Fund, and in most Member States

47 European Commission. (2016a). STAFF WORKING DOCUMENT. The Youth Guarantee and Youth Employment Initiative three years on.

48 Council of the European Union. (2016). Draft Council Conclusions on the implementation of the Youth Guarantee and the Youth Employment Initiative.

49 OECD (2015). Local implementation of youth guarantees: Emerging Lessons from European Experiences.

50 European Youth Forum (2018) Updated position on the European Youth Guarantee

51 European Commission. (2016a). STAFF WORKING DOCUMENT. The Youth Guarantee and Youth Employment Initiative three years on.

52 European Commission. (2016a). STAFF WORKING DOCUMENT. The Youth Guarantee and Youth Employment Initiative three years on.

53 Eichhorst, W., & Rinne, U. (2017). IZA Policy Paper No. 128: The European Youth Guarantee: A Preliminary Assessment and Broader Conceptual Implications. IZA Institute of Labor Economics.

54 European Commission. (2016b). EC (2016) Commission Communication 'The Youth Guarantee and Youth Employment Initiative three years on.

55 European Commission. (2016b). EC (2016) Commission Communication 'The Youth Guarantee and Youth Employment Initiative three years on.

56 Eichhorst, W., & Rinne, U. (2017). IZA Policy Paper No. 128: The European Youth Guarantee: A Preliminary Assessment and Broader Conceptual Implications. IZA Institute of Labor Economics.

57 Escudero, V., & López Mourelo, E. (2017). The European Youth Guarantee: A systematic review of its implementation across countries. Research Department Working Paper No. 21. International Labour Office

58 Eichhorst, W., & Rinne, U. (2017). IZA Policy Paper No. 128: The European Youth Guarantee: A Preliminary Assessment and Broader Conceptual Implications. IZA Institute of Labor Economics

59 European Commission. (2016b). EC (2016) Commission Communication 'The Youth Guarantee and Youth Employment Initiative three years on

60 Eichhorst, W., & Rinne, U. (2017). IZA Policy Paper No. 128: The European Youth Guarantee: A Preliminary Assessment and Broader Conceptual Implications. IZA Institute of Labor Economics

61 Blundell et al., 2004. «Evaluating the employment impact of a mandatory job search program», Journal of the European Economic Association, No. 2, pp. 569-606 in ILO (2017) The European Youth Guarantee: a systematic review of its implementation across countries.

62 ILO (2017) The European Youth Guarantee: a systematic review of its implementation across countries.

63 Loison-Leruste M., Couronné J., Sarfati F. 2016. La Garantie jeunes en action : Usages du dispositif et parcours de jeunes, Rapport de recherche No. 101, Centre d'études de l'emploi et du travail, Paris. In ILO (2017) The European Youth Guarantee: a systematic review of its implementation across countries.

64 European Court of Auditors. (2015). EU youth guarantee: first steps taken but implementation risks ahead, report by the Court of Auditor

65 Eichhorst, W., & Rinne, U. (2017). IZA Policy Paper No. 128: The European Youth Guarantee: A Preliminary Assessment and Broader Conceptual Implications. IZA Institute of Labor Economics

66 OECD (2015). Local implementation of youth guarantees: Emerging Lessons from European Experiences

67 European Commission. (2016b). EC (2016) Commission Communication 'The Youth Guarantee and Youth Employment Initiative three years on

through the Youth Employment Initiative, has been instrumental in setting up Youth Guarantee schemes⁶⁸. However, no robust estimates of global costs (impact) were available before proposing the Youth Guarantee scheme and total fund may therefore not be adequate⁶⁹. Moreover, sufficient national funding sources are also essential for the long-term sustainability of measures⁷⁰. Budget restrictions in countries and regions with large NEET populations, may be the cause that expectations of the European Youth Guarantee could not be met so far⁷¹.

Ensuring sufficient resources is an indispensable condition for the effective operation of Youth Guarantee programmes. This is true for the Public Employment Services - PES (i.e., administrative costs), which need to be well resourced to be ready to fulfil their mission, but also for the operational costs of programmes. For example, ensuring that the budget allocated to these policies benefits from sufficient flexibility has been found to be central to enable programmes to effectively respond to economic cycles⁷². An example of the importance of this flexibility was observed in the case of the Finnish PES, when the fast increase in the unemployed youth during the recent economic crisis challenged its ability to respond effectively⁷³. Also, accurately projecting the administrative and operational costs of the implementation of the Youth Guarantee is an important step, but also a complex one as it needs to involve material, human and organisational investments. In the case of France, for

example, an analysis of the execution of the Youth Guarantee in a number of local delegations showed that the budget allocated was around 80 per cent of the real cost, often due to difficulties to anticipate the real costs of an effective operation⁷⁴.

While acknowledging the progress made in the EU Member States with respect to policy focus and the design of youth-oriented schemes, the main expectations of the European Youth Guarantee could not be met so far. One issue concerns the budget restrictions in countries and regions with large NEET populations⁷⁵; a second major obstacle concerns the limited outreach of responsible public employment service agencies as shown by only partial registration of the NEET group.

Collaborative approach. Indeed, a holistic approach (rather than single shot) is recommended, which requires local partnerships (schools, training institutions, public employment services, employers, etc.), together with a collaborative approach with youth organizations. Moreover, analysts highlight the importance of local areas having the flexibility to tailor national programmes to local level contexts (adaptation to context, no “one size fits all” approach, even within local areas. Accordingly, right scale for policy learning and transfer between local areas with similar labour markets (regardless of variation in national contexts) is recommended⁷⁶.

Cooperation with partners and sharing of information across stakeholders is key for developing tailor made policies and for effectively reaching out to different types of NEETs (in particular those who are not registered at PES), offering integrated support, better preparing young people for the needs of the labour market and securing high quality offers of employment, continued education, apprenticeship and traineeships. A proactive partnership approach is also important to design policies that are tailored to the needs of different target groups of young people. From a strategic point of view, partnerships are also needed at European and national level to gain political support, develop adequate policies and ensure overall monitoring. The ethos of cross-sectoral, inter-agency collaboration needs to translate into concrete action at local level. PES cooperation with employers, as well as between employers and education providers, is important to secure good quality offers for young people. Cooperation with social partners remains a challenge. The involvement of youth organisations should be strengthened as it is crucial to ensure that activities are youth friendly and effectively reach young people that are further away from institutions⁷⁷.

Continuous dialogue between companies and education institutions helps ensure that skills match labour market needs as shown by the “Education Partnerships” in Germany. Education partnerships are set up between schools and companies, initiated by Chambers of Commerce. They foster cooperation between educational institutions and prospective employers, preparing pupils for the world of work and future apprenticeships⁷⁸.

Early involvement of young people/youth organisations in the design of Youth Guarantee schemes is essential. Engaging directly with young people in schools and establishing ‘Youth to Youth’ approaches are essential to build trust of young people in measures and to create a sense of ownership. The German “VET

Ambassadors” initiative is considered to be a very good example of this: VET Ambassadors are apprentices from participating organisations who offer career advice and support to pupils based on their personal experiences. It is also important to address all youth, especially the most disengaged/disadvantaged, e.g., NEETs. These people are often less likely to participate in traditional structures, so in order to effectively reach them, outreach approaches such as “street work” and youth work, and the use of social media are key. Youth organisations are often in the best position to deliver such initiatives to reach hard-to-access young people. Developing safe spaces and systems that are accessible to vulnerable young people can only be done by involving young people as co-creators of the measures and listening to youth voices. Thus, young people should be involved in the design of services and in outreach activities. Initiatives should create a space for young people’s voices to be heard or have more young people representation in partnerships at the national and local level⁷⁹.

Monitoring and evaluation. The Commission should put in place a comprehensive monitoring system for the YG Scheme, covering both structural reforms and measures targeting individuals⁸⁰ and tackle the ongoing lack of reliable data and indicators⁸¹. Indeed, efforts to monitor the Youth Guarantee’s implementation would contribute to underpinning national commitments to the YG⁸². The Youth Guarantee has suffered from a lack of transparency on how the initiative is implemented at national level, making it hard for stakeholders such as youth organisations and young people themselves to assess the quality of the opportunities offered through the scheme and to have independent monitoring. In order to improve the implementation of the Youth Guarantee on the ground, it is fundamental to establish clearly defined monitoring processes, where gaps can be highlighted and promptly addressed as necessary. Effective monitoring mechanisms, moreover, must be paired with stronger efforts to involve all relevant

68 Council of the European Union (2016). Draft Council Conclusions on the implementation of the Youth Guarantee and the Youth Employment Initiative

69 European Court of Auditors. (2015). EU youth guarantee: first steps taken but implementation risks ahead, report by the Court of Auditors

70 European Commission. (2016a). STAFF WORKING DOCUMENT. The Youth Guarantee and Youth Employment Initiative three years on

71 Eichhorst, W., & Rinne, U. (2017). IZA Policy Paper No. 128: The European Youth Guarantee: A Preliminary Assessment and Broader Conceptual Implications. IZA Institute of Labor Economics

72 Escudero, V., & López Mourelo, E. (2017). The European Youth Guarantee: A systematic review of its implementation across countries. Research Department Working Paper No. 21. International Labour Office

73 ILO (2012). Eurozone Job Crisis: Trends and Policy responses. Studies on Growth with Equity, International Institute for Labour Studies, Geneva, in ILO (2017) The European Youth Guarantee: a systematic review of its implementation across countries.

74 Farvaque et al., 2016. La Garantie jeunes du point de vue des missions locales: un modèle d’accompagnement innovant, mais source de bouleversements organisationnelle, Rapport de recherche No. 102, Centre d’études de l’emploi et du travail, Paris. In ILO (2017) The European Youth Guarantee: a systematic review of its implementation across countries.

75 Inadequate funding resulted in poor outreach, low-quality offers and insufficient monitoring of the outcomes.

76 OECD (2015). Local implementation of youth guarantees: Emerging Lessons from European Experiences

77 EC (2017): Youth Guarantee Learning Forum Report

78 EC (2017): Youth Guarantee Learning Forum Report

79 EC (2017): Youth Guarantee Learning Forum Report

80 European Court of Auditors. (2015). EU youth guarantee: first steps taken but implementation risks ahead, report by the Court of Auditors

81 OECD (2015). Local implementation of youth guarantees: Emerging Lessons from European Experiences

82 European Commission. (2016a). STAFF WORKING DOCUMENT. The Youth Guarantee and Youth Employment Initiative three years on

stakeholders in the process, particularly young people

2.2.1 The Youth Guarantee and persons with disabilities

Regarding the achievements of the Youth Guarantee and persons with disabilities, the review of the evaluations carried out agreed on the fact that interventions often remained insufficiently adapted to the needs of those facing multiple barriers (such as poverty, social exclusion, disability and discrimination) and further from the labour market^{84 85}. Therefore, the Youth Guarantee needs to engage better with disadvantaged young people (holistic and evidence-based support needed)⁸⁶. The disadvantage itself prevents disadvantaged youth to complete the Youth Guarantee program. In some countries, indeed, difficulties are reported with recruiting NEETs from certain target groups, such as under 18 minors, long-term unemployed youth or those with disabilities or coming from ethnic minorities^{87 88}.

Although the Youth Guarantee interventions in general are not sufficiently adapted to the needs of young people with disabilities, several examples of “good practice” have been identified through the literature review which are presented below:

A study from Eurofound⁸⁹ mentioned that “while some European countries have a good track record of providing tailored measures for the ill or disabled,

it is only recently that young ill or disabled people have been more specifically targeted. Some national Youth Guarantee implementation plans now make special provision for these groups or extend provisions available to all young people specifically to young people with disabilities. The study also highlighted several examples:

In the German-speaking community in Belgium, supported employment is specifically available for young jobseekers with disabilities. The Youth Guarantee Implementation Plan includes funding of €340,000 dedicated to supporting employment for young jobseekers with disabilities from this community.

In Greece, the Youth Guarantee includes measures through the PES for young people with disabilities. They include vocational training and special measures to improve the employability of young people with disabilities, who face a greater risk of social exclusion.

In Italy, financial incentives are offered to employers who convert apprenticeship contracts into permanent jobs for young people with disabilities in the targeted 15–29 years age group⁹⁰

Young people with disabilities face several barriers to accessing the labour market, ranging from negative

84 Council of the European Union (2016). Draft Council Conclusions on the implementation of the Youth Guarantee and the Youth Employment Initiative

85 European Commission. (2016b). EC (2016) Commission Communication ‘The Youth Guarantee and Youth Employment Initiative three years on

86 Council of the European Union (2016). Draft Council Conclusions on the implementation of the Youth Guarantee and the Youth Employment Initiative

87 Escudero, V., & López Mourelo, E. (2017). The European Youth Guarantee: A systematic review of its implementation across countries. Research Department Working Paper No. 21. International Labour Office

88 European Commission. (2016c). First Results of the Implementation of the Youth Employment Initiative. Annex two: key points from the evaluations

89 Eurofound, Exploring the diversity of NEETs, 2016. Available at: https://www.eurofound.europa.eu/sites/default/files/ef_publication/field_ef_document/ef1602en.pdf

and youth organisations⁸³.

83 European Youth Forum (2018) Updated position on the European Youth Guarantee

[ef_publication/field_ef_document/ef1602en.pdf](https://www.eurofound.europa.eu/sites/default/files/ef_publication/field_ef_document/ef1602en.pdf)

90 Eurofound, Exploring the diversity of NEETs, 2016. Available at: https://www.eurofound.europa.eu/sites/default/files/ef_publication/field_ef_document/ef1602en.pdf

perceptions and misconceptions held by employers to inaccessible working environments. In fact, disabled young people are over 40 % more likely to be NEET and more likely to leave school early. Another recent study of 2018 “*Activation measures for young people in vulnerable situations - Experience from the ground*” illustrates the measures to help young people with disabilities to access the labour market in place in some Member States⁹¹:

Supported employment may be provided, for example, through a social enterprise. This is the case of the Füngeling Router initiative in Germany, where young people can gain work experience and skills via a real job, which is suited to their abilities. The social enterprise, Füngeling Router, provides supported employment at workstations in mainstream labour market companies, on behalf of the relevant provider of occupational rehabilitation that financially supports the participants. Füngeling Router also employs young persons with disabilities temporarily and hires them out to mainstream labour market companies. The aim is to train these young people until they obtain a sustainable job, ideally in the same company.

Supported training pathways can help disabled young people to make the transition from school to work. In Germany, for example, incorporated training with vocational training centres is a form of supported dual (apprenticeship) training. Enterprises and vocational training centres provide assisted job placements.

Adapted training pathways can help disabled young people obtain a qualification which is recognised on the labour market. For example, the Austrian Integrative Vocational Training (IBA) programme allows young people to complete accredited apprenticeship training over a longer period of time, or to follow partially accredited curricula in a workplace setting. This programme was specifically designed for young people with disabilities (and others who would find it difficult to complete an apprenticeship on the open market).

Mentoring and coaching can provide the one-to-one support young disabled people need to make the transition into employment. Austria’s Youth Coaching (Jugendcoaching) programme offers individualised support on a case management basis, until the at-risk young person is integrated in education or in the labour market.

To support young people to build up their confidence and identify their own strengths, alternative approaches may be needed. For example, the Spanish PULSA Employment project, which includes young disabled people among its target groups, uses non-standard methods such as theatre workshops, group games and robotics to identify young people’s strengths, to empower them and to encourage them to participate in training and labour initiatives. Through individual and group activities, educational and professional guidance, the project aims to motivate the young person and identify his/her skills to match them with an appropriate offer. The project helps disabled young people develop their professional, communication and numeracy skills, as well as build their self-confidence before they enter into the labor market⁹².

Income support is an important complement to activation measures. For example, in Germany, transitional allowances are paid to the disabled person (Ausbildungsgeld) when they have no right to vocational training grants – which is typically the case for young people with disabilities as they have not usually been in employment before. This provides the young person with income support while they pursue vocational and pre-vocational training.

Financial incentives for employers can also help encourage the employment of disabled youth. In most EU countries, wage subsidies and dispensations are available for employers who take on persons with disabilities. However, it is important that jobs continue when subsidies are limited in time.

Finally, measures to change attitudes amongst employers, or to help them make practical adjustments, can help improve access to employment for disabled youth. For example, in the Netherlands, some collective agreements

aim to focus on capacity for - rather than barriers to - work and to improve support for employers.

The following boxes present further examples of good practice of specific labour market initiatives for young people with disabilities that have been implemented in Sweden, Germany, Malta, The Netherlands, UK, Latvia, Spain and Latvia.

91 Source Hadjivassiliou, K. (2016) *Mutual Learning Programme Thematic Paper: What works for the labour market integration of youth at risk*. European Commission, DG Employment, Social Affairs and Inclusion, pp. 21-23 (additional sources are cited within the text in EC (2018) *Activation measures for young people in vulnerable situations - Experience from the ground*. <https://ec.europa.eu/social/main.jsp?catId=738&langId=en&pubId=8142&furtherPubs=yes>

92 European Commission. (2017). “PULSA Employment, Spain”, *Youth Guarantee - promising practices database*. [Online]. Available at: <http://ec.europa.eu/social/main.jsp?catId=1327&langId=en>

Box 2 | Specific labor market initiatives for people with disabilities in Sweden⁹³

In addition to the general labour market measures, Sweden counts with a large number of labour market measures and programmes are specifically aimed at jobseekers with disabilities. If necessary, these people may be entitled to both vocational rehabilitation and/or special assistance in the form of subsidised employment or other support. This may include assistive devices in the workplace, a personal assistant, a special support person, measures for people with impaired sight and hearing, and special support to start a business. Jobseekers with disabilities may also be offered subsidised employment in the form of wage subsidies, public sheltered employment, and security and development employment. The individual's work capacity determines the size of the wage subsidy. In certain cases, provider allowances are also paid.

Wage-subsidised employment. The aim of wage-subsidised employment is to support people in their development towards a regular job and to stimulate employers to hire people from this group. Wage subsidies may be granted for a maximum of four years and are subject to the Employment Protection Act. When the provider is a public organisation, a provider allowance may also be paid.

Development employment. The aim of development employment is to offer individuals an opportunity to try to develop their work capacity through work and development initiatives. Development employment may last for a period of 12 months with a possibility of extension.

Public sheltered employment. Public sheltered employment aims to promote rehabilitation of the individual, develop and enhance work capacity and improve opportunities of finding a regular job. The target group consists of people with (socio-medical) disabilities and substance abusers.

Security employment. The aim of security employment is to offer individuals an opportunity to try to develop their work capacity through work and a range of development initiatives. The target group may also consist of people with disabilities whose needs cannot be met in any other way. Security employment is subject to the Employment Protection Act.

Samhall. The target group may also be offered employment at Samhall AB, whose aim is to produce goods and services in demand and, by doing so, create meaningful and stimulating work for people with disabilities. Youth under the age of 30 were prioritized to these employments 2014-2017.

Assistive devices. Assistive devices in the workplace can be excellent tools, and are often all that is needed in a new job. This may entail adapting the workplace or acquiring a particular product, and support may be given to both the employer and the employee. Employers and employees may each receive support of up to SEK 100 000.

Personal assistance. An employee may sometimes need to ask a colleague for help with certain tasks. In these cases, the employer may receive a contribution to offset any extra costs. Employers may also receive compensation if they take on a young person with disabilities for practical vocational orientation and if they are providers of labour market programmes. Self-employed people may also receive this support.

Individual support (from an SIUS consultant). If a person needs a great deal of individual support to learn to perform their work tasks, employers can receive personal introduction assistance from a specially trained employment officer, known as a special introduction and follow-up support consultant (SIUS consultant). This support is gradually decreased over the support period and will end completely when the person is able to perform their tasks independently.

Trainee programmes in the state sector. The Swedish Public Employment Service has been instructed to gradually implement trainee programmes in the state sector for people with disabilities. Public employers

should set an example.

Box 3 | German initiative to support disadvantaged young people and their employers⁹⁴

The instrument 'Assisted Vocational Training' is a funding instrument provided by the PES to prepare young people with learning disabilities or disadvantaged young people for vocational training (for example, by job interview assistance or internships) and support them throughout the training (for example, support with tests that need to be taken during the apprenticeship). Employers which offer vocational training to a vulnerable young person receive also individual support in regular meetings. Supporting measures depend on the needs of the company, such as coaching for workplace mentors or the establishment of vocational training plans

Box 4 | Work customization through job carving and crafting in Malta⁹⁵

Whilst many young people with complex needs such as disabilities can compete for and obtain jobs through traditional routes, others may not be able to complete all of the tasks defined in a job role by an employer. Although they may be defined as lacking the skills necessary to compete in the open jobs market they can however be successfully integrated if employers introduce work customization. Work customization involves designing a role to fit a person, rather than seeking to fit a person into a job. It can involve many elements, including adjusting hours and location, duties and responsibilities, and expectations. Work customization strategies can both help employers to recruit suitable workers and enable young people with complex needs to take advantage of work opportunities. This can support a variety of employees to work in ways that are tailored to meet their individual circumstances and needs and assists employers frustrated by labor shortages, especially in tight markets. Customization involves two key elements: Job Carving and Job Crafting. Job Carving is often applied in order to specifically provide employment opportunities for disabled people. It involves breaking a job down into a number of work steps which are analyzed to identify functions that can be performed by a disabled person for whom a job role is carved. Job Crafting allows employees themselves to further adapt a job to take advantage of opportunities to customize their role. This is a departure from classic top-down job design theory and can be beneficial to an organization through enhancing a worker's performance and motivation. Applying these approaches can maximize the utilization of the skills and strengths of disabled workers who possess the relevant competences.

In Malta, the Maltese PES (Jobsplus) established a partnership with the Lino Spiteri Foundation (LSF), which specializes in the labor market integration of jobseekers with disabilities. LSF set up a corporate relations unit to support enterprises in the recruitment of disabled people. The corporate relations executives identify existing occupations within the enterprise which are potentially suitable for jobseekers with disabilities. Tasks and job descriptions are then 'carved' to suit the jobseekers with disabilities. This enables the creation of valid and person-centred vacancies within a given organization whilst promoting inclusion. The 'carving' exercise is driven by the enterprise requirements and the existing competencies and skills of the registered jobseekers with disabilities. This is coupled with pre-employment efforts such as training and work exposure schemes offered by Jobsplus to improve the employability and preparedness of the registered disabled jobseeker. By April 2018, it was possible to create 278 jobs suitable for jobseekers with disabilities by making use of the job-carving approach⁹⁶.

93 Youth employment policies in Sweden – the Swedish response to the Council recommendation on establishing a Youth Guarantee. <https://www.government.se/49b72e/contentassets/92e8785ae4c6468fb6029118acffddd/youth-employment-policies-in-sweden--the-swedish-response-to-the-council-recommendation-on-establishing-a-youth-guarantee>

94 EC (2018) Activation Measures for young people in vulnerable situations - Experience from the ground.

95 EC (2018) Activation Measures for young people in vulnerable situations - Experience from the ground.

96 European Commission. (2018). 'Promising PES Practice: Job-carving for jobseekers with disabilities, Malta', PES Practices Database. [Online]. Available at: <http://ec.europa.eu/social/main.jsp?catId=1206&langId=en>

Box 5 | Inclusive Redesign of Work Processes in The Netherlands⁹⁷

In the Netherlands, Maastricht University and the Dutch Employee Insurance Agency (UWV) are developing a method called the Inclusive Redesign of Work Processes (IHW). The method identifies options for reorganizing the workplace or work processes in order to create jobs suitable for young people with a disability, especially if low-qualified or low-educated due to a chronic mental illness, psychological disorder, developmental disorder or a learning disability. As the method reallocates some simple tasks from a qualified worker, to create a position that can be filled by a worker with lower qualifications, the employer may potentially incur some savings on the wage bill. The IHW method was tested in practice with the participation of youth with disabilities in a hospital between 2010 and 2013. During the pilot project, about 100 recipients of disabled assistance started working at the hospital. The qualitative evaluation of the project shows that the IHW method proved efficient in creating appropriate positions for disabled young people. The cost-benefit analysis also suggested that enabling people with disabilities to enter employment may be cost effective for the employer, despite a greater need for guidance. This approach of job creation has been successfully implemented in a variety of private and public organizations, due to the support in applying this method by a nationwide network of consultants of the Dutch PES104. Creating a job in this way is labor-intensive and requires time, energy, and commitment. It also requires particularly skilled staff who can support the process. But it creates opportunities for those young people who need specialized support and contributes to meaningful and long-term integration.

Box 6 | Continuing to support the young person once in work in the UK⁹⁸

Experience shows that employment support needs to continue once the young person has taken up a job offer,

particularly for those in vulnerable situations. This support could be offered not only to the young person but also to the employer. Experience from the UK Talent Match program shows that personalized support needs to stretch all the way into employment as in-work support improves retention. From the experience of the program, this involves giving advice on a range of issues rather than taking action on behalf of young people, for instance:

- Practical support e.g., help with arranging transport to work, appropriate clothing or assistance with organizing caring responsibilities.
- Support with non work-related issues that impact on keeping a job e.g., advice about making hospital appointments, dealing with probation.
- Guidance on work-related matters including work-appropriate behavior and managing working relationships.
- Assistance provided to an employer to support a beneficiary's job retention such as in the case of young people with disabilities, providing practical support on resolving issues during the recruitment by redesigning the interview process to give them the best chance to showcase their skills and abilities. This in-work support needs to be tailored to the beneficiary and employer, with good communication between the parties involved.



97 EC (2018) Activation Measures for young people in vulnerable situations - Experience from the ground.

98 EC (2018) Activation Measures for young people in vulnerable situations - Experience from the ground.

Box 7 | Measures for long-term unemployed young people and young people with disabilities in Latvia⁹⁹

Latvia has measures targeting LTU youth and young people with disabilities or caring responsibilities. Subsidized work placements aim at fostering young unemployed social inclusion by helping them understand the requirements of the labor market and settle in permanent jobs. Employers provide a qualified work supervisor for each participant that assist them in acquiring the basic skills and abilities required (their involvement may differ depending on the complexity of the tasks and the participant's profile). Financial aid (up to 50 % of the total wage costs in the form of a monthly wage subsidy that cannot exceed the minimum wage) is granted for a period of 12 to 24 months. For people with disabilities support is capped and at 1.5 times the minimum wage. Additional expenses for work supervisors, working place adaptation for persons with disabilities and other support staff are covered by the PES.

Box 8 | Program to achieve the Youth Guarantee objectives in Spain¹⁰⁰

FSC Inserta, the organization from ONCE Foundation for Training and Employment for disabled people, is a non-profit organization that carries out personalized work integration itineraries for people with disabilities, offering free training activities as well as job intermediation to access a job. FSC Inserta developed the Youth Employment Operational Program ("POEJ") within the new programming period of the European Social Fund (2014-2020) which aimed to improve the employability of young people with disabilities through training for employment and lifelong learning. To this end, it combined a variety of dual vocational training plans, training with a commitment to recruitment, mixed training schemes in workshops and trade schools, non-work placements in companies, innovative training and employment plans. It counted with the support of secondary education centres, universities and higher education centres to stimulate interest in young people to follow degree studies.

2.3 Recommendations for a successful Youth Guarantee

Although the Youth Guarantee has encountered several obstacles that may have hindered its impact on the ground, it still represents a key initiative and an important investment in young people, which should be continued and strengthened. The shortcomings that have been identified should be addressed in order to ensure the sustainability of the initiative. The key recommendations for a successful Youth Guarantee have been summarised as follows:

International Labour Organization (ILO), 2017

ILO¹⁰¹ proposes six pre-requisites for Youth Guarantee success:

Clear eligibility criteria of target group, including measures in line with the target group needs and personalised (*Clear target group identification*).

Early intervention, since +4 months enhances the risk of longer-term unemployment (*Quality of offers and services*).

Comprehensive package of varied measures (*Quality of offers and services*).

Creation of appropriate institutional framework, including social dialogue (*Collaborative approach*).

Sufficient resources ensured, including accurate projecting of costs (*Resources*).

Provisions to ensure beneficiaries' commitment (*Quality of offers and services*).

European Youth Forum, 2018

European Youth Forum's¹⁰² key recommendations:

1. Recommendations to Member States

i. To recognise Youth Guarantee as a right for all young people (*Conceptual approach*).

ii. Cross-sectoral cooperation to implement a holistic and integrated approach to vulnerable young people (*Governance; collaborative approach*).

iii. To strengthen the involvement of youth organisations (*Collaborative approach*).

iv. Sufficient funding for Youth Guarantee in national budgets, especially in not eligible countries (*Resources*).

2. Recommendations to the European Union

i. To establish a commonly agreed definition of young people grouped under the term NEET (wide, heterogeneous, diverse) and collect disaggregated data (*Clear target group identification*).

ii. To define clear quality criteria and standards for offers (*Quality of offers and services*).

iii. To ensure continued and increased funding (post 2020) (*Resources*).

iv. To simplify access to Youth Employment Initiative (YEI) and European Social Fund (ESF) to youth organizations (*Governance*).

3. Recommendations to the European Union and Member States

i. To include Youth Guarantee as part of a wider, comprehensive strategy to increase youth employment and promote social inclusion (*Governance*).

ii. To ensure, monitor and evaluate quality of mentoring, placement and outcome, including relevant stakeholders, including young people and youth organizations (*Monitoring and evaluation; collaborative approach*).

European Trade Union Confederation (ETUC), 2020

Key messages from the European Trade Union Confederation¹⁰³ include:

1. Major shortcomings in implementation: low quality of the offers provided under the scheme; timely intervention within the promised period of 4 months; the poor outreach strategies to offer the scheme to those young people who are furthest from the labour market (NEETs) (*Quality of offers and services*).

99 EC (2018) Employment and entrepreneurship under the Youth Guarantee - Experience from the ground <https://ec.europa.eu/social/main.jsp?catId=738&langId=en&pubId=8143&furtherPubs=yes>

100 ANED 2016-17 -Task Social Pillar (focus topics) Country report. Country: Spain https://sid.usal.es/idocs/F8/FDO27445/ANED_2016_17_Report_Social_Pillar.pdf

101 Escudero, V., & López Mourelo, E. (2017). The European Youth Guarantee: A systematic review of its implementation across countries. Research Department Working Paper No. 21. International Labour Office

102 European Youth Forum. (2018). Updated position on the Implementation of the Youth Guarantee. Adopted by the Board. Brussels, Belgium, 20-21 January 2018

103 European Trade Union Confederation. (2020). Resolution on Reinforced Youth Guarantee; The revisited fight against youth unemployment. Adopted at the Executive Committee Meeting of 2-3 July 2020

- 2. Better involvement of social partners on European, National, Sectorial and company level in design, implementation and evaluation of the scheme (*Collaborative approach*).
- 3. No clear picture of NEETs (*Clear target group identification*).
- 4. Financial discipline and social responsibility (*Resources*).
- 5. YG has the potential to contribute to the creation of quality jobs and stability for young people particularly by creating synergies with other European initiatives such as: European Pillar of Social Rights; Skills Agenda; European minimum wage initiative; European Green Deal (*Collaborative approach*).
- 6. Binding quality criteria framework jointly designed and implemented by the social partners for all offers under the YG scheme (*Quality of offers and services*).
- 7. Appropriate financial resources from both national and EU budgets (*Resources*).
- 8. Youth Employment Initiative (YEI) should be brought back as a dedicated channel that allows a coalition of stakeholders (notably PESs, Trade Unions and NGOs) to implement crisis intervention as well as prevention (*Governance*).

The following table gathers and summarizes the key areas of the Youth Guarantee that can be improved according to ILO, EYF and ETUC's views:

TABLE 1 | Summary of recommendations for a successful Youth Guarantee

	ILO, 2017	EYF, 2018	ETUC, 2020
Enhance the quality of the offers and services	X	X	X
Clearly identify the target group (NEETs)	X	X	X
Governance		X	X
Collaborative approach	X	X	X
Resources	X	X	X
Monitoring and evaluation		X	

Thus, key lessons learnt from the evaluations of the Youth Guarantee focus on:

Making the Youth Guarantee more accessible to vulnerable young people

The Youth Guarantee has not succeeded in reaching young people who are further away from society and the labor market. One of the main reasons for this is lack of information and clarity on the people covered under the term NEETs and on the heterogeneity of their situations. Thus, there is an urgent need to clearly define the term and to gather more data on young people in NEET situations. Such data should be disaggregated according to the various subgroups forming the NEET population, with a double objective: to gain a better understanding of the specific obstacles they have to overcome, and to use the data to implement outreach strategies and targeted measures based on the specific needs of each subgroup.

Enhancing the quality of the offers and beyond

Quality refers to the specific characteristics of the offer (i.e., to allow young people to access real opportunities instead of short-term/one-shot experiences without prospects) but it should also include the need to support young people, particularly the most vulnerable, with adequate counselling, supervision and guidance before, during and after their placement. For the Youth Guarantee to support young people who are furthest away from society, quality offers must be paired with preventive and supportive measures addressing their specific needs. Given the current lack of clearly defined quality standards, many young people are offered "one-size-fits all" solutions, based on the assumption that "any job is better than no job". The EU, together with social partners and civil society organizations, must define clear quality criteria and standards for offers under the Youth Guarantee, including access to social protection, minimum income and employment rights.

Putting in place effective monitoring mechanisms

It is of paramount importance to establish clearly defined monitoring mechanisms to ensure that the implementation of the Youth Guarantee is analyzed and evaluated from both a quantitative and qualitative perspective, including the number and quality of the offers; the number of young people reached (particularly among the most vulnerable); and the quality of the outcomes. Such monitoring mechanisms must be coupled with efforts to involve all relevant stakeholders in the monitoring exercise, particularly young people and youth organizations.

Ensuring good governance and collaboration amongst stakeholders

Good governance is fundamental. Lack of coordination between public authorities, lack of involvement of relevant stakeholders, and lack of a long-term vision will negatively affect not only the quality of the offers but the whole Youth Guarantee instrument. Member States must strengthen the cooperation between employment services and the educational and training systems, also including trade unions and youth organizations. Cross-sectoral cooperation is needed to implement a holistic and integrated approach to support young people facing multiple barriers to social inclusion, ensuring that the Youth Guarantee is part of a wider, comprehensive strategy to increase youth employment and promote social inclusion.

Safeguarding adequate funding

Policies must be matched with adequate financial resources in order to ensure their continuity as well as long-term sustainability and impact. EU financial support to the Youth Guarantee represents a clear added value since many initiatives could not have been implemented without the allocation of specific EU funding. EU funding must continue and be reinforced. However, EU funding alone, is not sufficient. Member States are responsible for dealing with the problems associated to young people's participation in the labor market and therefore national budgets must adequately support these efforts.

3. The feasibility study on the Child Guarantee

This section is based on the results from the Feasibility Study on the Child Guarantee published in 2020 which carried out a deep analysis of the situation of the 4 target groups of children (children in institutions, children with disabilities, children with a migrant background (including refugee children) and children living in a precarious family situation in accessing the 5 policy/service areas (or fundamental rights): health, education including early childhood education and care, housing and nutrition. The objective of the Feasibility Study on the Child Guarantee was to provide a thorough analysis of the design, feasibility, governance, and implementation options of a possible future Child Guarantee scheme in the EU Member States, based

on what is in place and feasible for the four groups of particularly vulnerable children. The study also attempted to explore the possibility of extrapolating and learning from the insights found for the four groups to larger groups of, or eventually all, children in the EU.

The following section presents a summary of the main findings reported by the Feasibility study on the situation of EU Member States regarding access to the 5 key policy/service areas by vulnerable children in general and by children with disabilities in particular, highlighting the main barriers and challenges but also the suggested actions for improvement.

3.1 Access to key support services. Main barriers, challenges and suggested actions

Free healthcare

Barriers and challenges

Although most EU Member States have policies that are designed to provide free healthcare for children, the definition and reality of 'free healthcare' differ greatly between Member States, with some reporting that all healthcare-related services for children are free and others indicating that only some services are free.

Public health systems can have long waiting times which constitute access barriers. This can be compounded by a lack of personnel in some areas, in particular a shortage of specialist child health staff, infant nurses and paramedical staff and this situation is reported as worsening in some Member States.

The limited availability of dental care and of mental health services and their associated costs, is also a problem in a number of Member States.

Another barrier is the excessive cost of and co-payment for medicines. Furthermore, out-of-pocket payments for over-the-counter products¹⁰⁴ can represent a severe challenge for the budgets of families at risk of poverty or social exclusion, as can the cost of additional food, clothing, or consumables for families of children suffering from chronic diseases.

Low-income families can also be particularly affected by the barrier of loss of income caused by taking time off work, and the cost of travel to take children to health services.

Access to disease prevention and health promotion programs can be a problem for children in vulnerable situations where there is insufficient outreach to these children.

Where particular services, such as rehabilitation services for children or child mental health services, are underdeveloped, access can be more problematic for children from less affluent families. Frequent changes

of address can compromise continuity of access to preventive programs. In addition, poor coverage of medical services, specifically secondary-level diagnostics, in some rural areas can be a significant barrier to access, as can the cost of accessing urban-based secondary services. The lack of effective record systems in areas such as immunization and health screening can also hinder outreach to and follow up of children in vulnerable situations.

In several eastern Member States services overall are under increasing pressure. In particular, the right to travel and mutual recognition of qualifications within the EU have led to an outflow of doctors, and other professionals, to other Member States with higher remuneration and better working conditions – leading to a further deterioration in services for those who remain. Community-based services, children's services, and rural services are amongst those to suffer this professional depopulation most.

A major barrier to improving the situation is that statistics are very poorly available – as to the number of children, provision of healthcare services in primary care overall or to children specifically and in estimates of need or of risk. Many sources of data are potentially available within current national statistical systems, and could be re-analyzed to considerable effect, but currently this is not happening.

More generally a lack of information and/or consciousness about health issues and of early diagnostic services for vulnerable families can be a barrier to access and to early intervention services.

Suggested actions

All Member States should ensure universality of healthcare and affordability of healthcare costs, by following the WHO's key principle of universal health coverage.

There is no "one size fits all solution". Solutions need to be adapted and developed to fit in with existing

systems and to be locally specific.

In spite of the diversity and complexity of healthcare systems across Member States¹⁰⁵ and the impossibility to transfer solutions from one country to another, it is however possible to identify some of the elements that may be helpful in improving access by children in vulnerable situations to free healthcare:

Improving the collection of statistics on children's access to healthcare and especially making much better use of existing data sources to analyze the situation of children in general and children in vulnerable situations in particular to different aspects of health services. This can provide the basis for better planning of health services for children in vulnerable situations.

Increasing investment in order to strengthen health services for children in areas of weakness.

Putting in place universal and regular health check-ups for children, especially during the first years of life and regularly at school. Ensuring access to routine examinations at the successive growth stages of the child will guarantee early detection of developmental problems and diseases, as well as help to ensure full vaccine coverage.

Introducing exemption or reimbursement schemes for children in vulnerable situations to cover co-payments for healthcare and medication, in order to ensure that the catalogue of treatments that are fully free or reimbursed include a full range of interventions for children.

Investing in and improving (mental) health and rehabilitation services for children.

Investing in health literacy for all children (and their parents), including the most vulnerable, to foster healthy behaviors.

Developing multi-service or extended schools, aimed at offering integrated services (including healthcare and dental care).

Putting more emphasis on prevention and outreach, especially to mothers and babies.

Enhancing professional training in relation to health services for children and fostering the exchange of learning and good practice between professionals.

¹⁰⁴ E.g., remedies for mild infant fever and pain relief, dental care products, and teenage girls' personal hygiene products.

¹⁰⁵ In terms of different socio-political structures, varied funding mechanisms, and varied professional practice patterns.



Exploring the potential role of nurses in strengthening the care delivery team, and their proactive roles as educators in primary care and public health.

Developing unique record identification and thus the tracking of a child's history and needs across service providers. This is crucial for a well-coordinated healthcare delivery.

Enhancing child-based public health electronic record systems covering areas such as immunization information, health screening and other key data (thus facilitating reports to clinicians of the details of children overdue for procedures).

Encouraging home-based records (parent-held records). These are advocated by WHO as good policy – they enable parents to keep a record of vaccination and other key health and developmental events. They also provide an informal means of entitlement whereby a parent can present the record to a health provider showing what services are due or overdue for their child.

Although many of these measures fall under the competence of Member States as the responsible bodies for health services, the European Commission, through the establishment of the Child Guarantee, could provide important support by facilitating digital health standards development and functional innovation, targeted research, and networks for innovation sharing.

Healthcare and children with disabilities

Specific barriers and challenges

Children with disabilities often find that their needs are not being sufficiently recognized in mainstream health provision for children and also that their particular needs are not being addressed.

They require both disability-inclusive health policies (i.e., available to all citizens, including those with disabilities) and they need disability-specific policies to respond to the specific, impairment-related, health needs of persons with disabilities.

A lack of impairment-specific healthcare and rehabilitation may lead to difficulties in overcoming obstacles (such as those that can be overcome by means of rehabilitation or assistive technology) or accelerate the deterioration of conditions that could otherwise be prevented.

Early detection and identification of disabilities is not well established in most countries. Currently in many Member States healthcare services specific to children with disabilities are not sufficient in terms of quantity and, in some cases, not adequate in terms of quality.

In many Member States, there are wide local variations in the types of care that are available. Key barriers that arise in relation to mainstream health services include their failure to adapt to the needs of children with disabilities and problems of accessibility.

Affordability is also seen in many Member States as a major barrier. Furthermore, in some Member States, parents of children with disabilities resort to private healthcare services to close the gap between the limited services offered by the public system.

Suggested actions

The following specific measures combined with the general ones identified above, may enhance access to healthcare by children with disabilities.

Member States with no specific legislation guaranteeing the rights of children with disabilities to free healthcare, or those where policies are conditional or not clearly outlined, should develop laws, norms, and regulations in line with the UNCRC, UNCRPD, the WHO's Universal Health Coverage (UHC), and the EU disability strategy.

Member States where specific policies protecting the rights of children with disabilities to free healthcare exist should conduct regular impact studies to ensure that this right is being realized in practice. Where necessary they should invest in raising awareness of the rights of children with disabilities to core health services.

Member States with weak provision should be encouraged to increase earmarked healthcare spending for children with disabilities, including for the provision of rehabilitation and assistive technology devices. They should also strengthen the dual focus of the health system on both mainstream and disability-specific provision, to ensure a holistic, integrated, and multidisciplinary approach to the work.

All Member States should ensure that they have in place early identification and early intervention (EI/EI) services which include components of screening, prevention, and intervention in the areas of developmental delay or disability. For this, increased human/resource capacity is needed, along with

the assurance that professional education provides sufficient core values, knowledge and skills related to delays and disability. EU funds could be used to expand EI/EI services across the EU and facilitate cross-border exchange of good practice and professional training.

Free education

Member States have an obligation to provide free compulsory education in an inclusive education system to all school-age children¹⁰⁶.

Barriers and challenges

Although in theory all Member States provide access to free and inclusive education, in practice this can be limited:

In relation to 'free' education, this may only cover tuition fees but no other additional or "hidden" costs (such as of textbooks, school trips, canteens, or transport) which can be a significant barrier to school access for children in vulnerable situations.

In relation to availability, gaps in provision may occur in remote rural areas in some Member States, partly as a consequence of budget cutbacks or 'decentralization' during the crisis. Such shortages translate into absenteeism, overcrowded classes, or a lower quality of education.

In relation to inclusive education, although most Member States promote inclusive education, many systems are partial systems with segregated education provision for some children (especially those with disabilities and some of those considered to have SEN). Schools may discriminate against specific groups of children, either because they are seen as an excessive burden, or because parents from the 'majority' threaten to withdraw their children from school when 'undesirable' children are enrolled. A problem that can particularly affect children from vulnerable backgrounds is the uneven quality of schools, with children from these backgrounds being disproportionately confined to disadvantaged schools. Indeed, one of the main problems surrounding the accessibility of good-quality education is school segregation, as disadvantaged

106 The right of the child to education is enshrined in the UNCRC, the UNCRPD, and the CFR.



groups cluster together in less selective schools, while ‘majority parents’ withdraw their children from these schools to enroll them in more selective schools elsewhere. Segregation by school is a factor that negatively affects the academic performance of the most vulnerable groups¹⁰⁷.

Suggested actions

Establish a clear legal definition of school-related costs and determine who is responsible for what cost.

Reduce financial barriers to accessing education. Free education should also cover elements of access and participation: tuition, transport, textbooks, all-school activities, and meals.

Develop equity funding strategies for disadvantaged students in order to equalize educational outcomes. This necessitates priority treatment (e.g., in admission processes), compensatory action and additional resources for disadvantaged children who lag behind or are at greater risk than others. It can involve investing in increasing the quality of education in schools in disadvantaged areas or with a higher population of disadvantaged groups.

Invest in teacher training and staff incentives for more inclusive schooling. For instance, put in place targeted subsidies or retention strategies for experienced and well trained teachers in disadvantaged schools. Invest in specific in-service training and professional learning communities specifically devoted to strategies to promote equity in education.

Foster the desegregation of schools and classes by promoting inclusive education which ensures that children from disadvantaged backgrounds are not put in special schools or special classes or unduly pushed into the less valued technical and vocational tracks.

Develop partnership programs between schools, parents, local communities and social services. This can be assisted by measures such as employing educational welfare officers or home-school liaison officers to systematically activate the dialogue between

schools, parents and local communities and to work with young people and their families experiencing difficulty with school attendance.

Develop all-day schools where children, especially those from economically disadvantaged families, receive free education services that otherwise they would have to purchase in the private sector (i.e., private lessons after school).

Education and children with disabilities

Box 9 | Conceptual and terminological clarifications regarding children with disabilities

Although various interpretations of the right to inclusive education are in use in EU Member States, the UNCRPD Article 24 and UN Committee on the Rights of the Child General Comment No 4 set out a framework that must be implemented by EU Member States that have ratified the convention, as well as by the EU as a whole. Of particular relevance are the provisions and distinctions in terminology the general comment obliges EU countries to take into consideration, namely the following:

Integration is a process of placing persons with disabilities in existing mainstream educational institutions, as long as the former can adjust to the standardized requirements of such institutions.

Inclusion involves a process of systemic reform embodying changes and modifications in content, teaching methods, approaches, structures, and strategies in education to overcome barriers, with a vision serving to provide all students of the relevant age range with an equitable and participatory learning experience and environment that best corresponds to their requirements and preferences.

Placing students with disabilities in mainstream classes without accompanying structural changes to, for example, organization, curricula, teaching and learning strategies, does not constitute inclusion.

The right to inclusive education is assured without discrimination and on the basis of equality of opportunity. Discrimination includes the right not to be segregated and must be understood in the context of the duty to provide accessible learning environments and reasonable accommodation.

The exclusion of persons with disabilities from the general education system should be prohibited, including any legislative or regulatory provisions that limit their inclusion on the basis of their impairment or the degree of that impairment.

States have a specific and continuing obligation to move as expeditiously and effectively as possible

towards the full realization of UNCRPD’s Article 24. This is not compatible with sustaining two systems of education.

Specific barriers and challenges

Findings from the Feasibility Study on the Child Guarantee reveal that, although there is a strong trend in many Member States to include children with disabilities in mainstream schools, there is still a long way to go to make education really inclusive.

Sometimes children with disabilities are segregated in special units or special classes within mainstream schools and thus not fully included. In some Member States significant numbers of children with disabilities are still educated in separate schools or institutions and there may be resistance to inclusive education.

The best interests of the individual child may not always be sufficiently taken into account for children with disabilities. Even where most children with disabilities are educated in mainstream schools, barriers may exist to their real inclusion:

- negative attitudes and perceptions and lack of awareness;
- failure to follow rights guaranteed in legislation;
- failure of mainstream schools to adapt their provision to meet the particular needs of children with disabilities;
- poor coordination between educational, social and health services;
- relatively poor school infrastructure for addressing the needs of children with physical and sensory impairments and limited physical access;
- prejudice and discrimination against children with disabilities and bullying in schools;
- shortage of necessary specialized support services and specialist staff in mainstream schools;
- lack of budget funding for inclusive education.

Overcoming these gaps and challenges in inclusive education will require deepening awareness that: (a) children with disabilities are better integrated and make more learning gains in inclusive education than in

¹⁰⁷ Segregation occurs when students from the lowest income quartile are enrolled in schools that have a high concentration of vulnerable students. The concentration of students with a low socioeconomic profile thus creates ‘ghetto’ centres. These schools can suffer from insufficient resources, shortage of teachers, difficulties in retaining high-quality teachers, bad infrastructure and poor equipment. All of this leads to high levels of early school-leaving and academic failure.



segregated schools; and (b) other children's social skills in dealing with diversity develop better in inclusive schools.

Suggested actions

Ensure the development of a strategy to move to fully inclusive education provision.

Develop inclusive systems by ensuring that inclusive education is understood as high-quality education for all and not as another term for special education.

Put in place teacher education that promotes the inclusion of all children (including those with disabilities) at all levels (i.e., initial teacher education, induction of beginning teachers and continuing professional development).

Invest in educating parents on their children's rights and on their role as advocates within an inclusive education system.

Give a priority to children with disabilities in enrolment to public pre-school, primary and secondary education and foster cross-sectoral collaboration to support their participation in inclusive education.

Ensure that where children with disabilities are faced by extra costs to attend school, such as additional transport costs or dietary needs, these costs are supported.

Put in place regular monitoring and reporting on the situation of children with disabilities in Member States where inclusive educational policies exist, to ensure that practice on the ground adequately reflects policy.

Free Early Childhood Education and Care (ECEC)

Barriers and challenges

The most important barrier for access to high-quality ECEC is lack of places, especially for the youngest children.

The Feasibility Study on the Child Guarantee reveals important geographical disparities in the distribution of places. In some Member States it is a rural-urban divide, while in others it is precisely the urban metropolitan areas that suffer from shortages. In the majority of cases, it is in the poorer areas with lower female labor participation that children suffer most from this inequality. In cases of shortage, there is a risk that private ECEC is taking over, demanding higher parental fees. In addition, in those cases, priority is often given to women at work, resulting in barriers for children from

unemployed or low-employed families.

Where places are available, they are not always accessible and affordable. Especially for the youngest children, long distances, inflexible hours and parental fees jeopardize access.

When ECEC is free, there may be indirect costs that make ECEC unaffordable for some parents (e.g., clothes, transport, meals and educational materials).

Bureaucratic and administrative complexities in the enrolment of children affect vulnerable families to a larger extent than other families. This is especially the case when the competence for childcare is devolved to local municipalities or regions without a strict national reference frame being in place. In those cases, fees and regulations may vary significantly from one area to another, making it hard for parents to exercise their rights. In addition, this may also entail variation in quality, which disadvantages vulnerable families.

The poor quality of some ECEC provision can be a particular barrier. Lack of expertise, combined with a shortage of staff from ethnic minorities and staff acquainted with the care of children with special needs, is often mentioned as a reason why some parents do not have confidence in the ECEC service and prefer not to enroll their child.

In split systems, the ECEC for the youngest children is typically considered as 'childcare' for women at work. It is part of a labor and gender policy, rather than conceptualized as an educational environment in its own right. As a result, ECEC for the youngest children is scarcer than pre-school places and priorities are set that favor children with parents in employment.

Lack of flexibility in opening hours, which do not match the needs of parents (i.e., their working hours), can particularly affect single parents, parents with a migrant background and parents in precarious labor contexts as they often work atypical hours and may therefore encounter difficulties in using ECEC.

Suggested actions

Better monitor the numbers of children in vulnerable situations in ECEC as a starting point for improving access.

Increase investment in the youngest children under 3 and favor steps towards unification of split ECEC systems.

Invest in increasing the availability of provision and in addressing geographic disparities in the lack of places.

Invest in quality: investments in quantity should go hand in hand with investments in quality. Reducing quality to increase quantity would be detrimental for those children whose development is fostered less well at home and would widen existing educational gaps. In order to be effective, earmarked funds for improving the quantity of ECEC provision need to be accompanied by strict quality standards.

Put in place quality standards to ensure that children in vulnerable situations do not end up in lower-quality provision. When municipalities or local levels of policy are responsible for ECEC, it is crucial that national regulations and guidelines offer a framework that binds the local levels, in order to avoid important geographical disparities in the quantity and quality of ECEC. Such guidelines can define staff qualifications, attendant-child ratios, group size, material equipment and facilities and oversight procedures (the quality framework in ECEC developed by the European Commission could be followed).

Develop a well-trained and paid workforce. Without an adequate workforce, increasing the enrolment of vulnerable children in ECEC will have little impact, if any. Clear anti-discriminatory frameworks need to be accompanied by investment in pre-service and in-service training in working with children with special needs, in multilingualism and cultural awareness and in anti-poverty measures.

Reduce fees and subsidize related costs, or provide wholly funded ECEC, for children in vulnerable situations especially those in low-income families. Ways to increase affordability and address indirect costs include free transport and free lunches in school canteens.

Legislate to make ECEC an entitlement for all parents and their children.

Where there is a shortage of ECEC provision, develop priority enrolment for children from disadvantaged backgrounds, by developing rules such as setting specific quotas for the enrolment of children from disadvantaged backgrounds and adjusting those rules to the local composition of the population of young children.

Introduce priority funding for ECEC provision in disadvantaged areas, which can compensate for the lower fees (if means-tested) paid by low-income

parents; and allow for more generous staffing and operational expenses in services to disadvantaged families.

Promote inclusion and counter spatial segregation by allocating more resources to daycare centres in deprived areas where there are concentrations of children from disadvantaged backgrounds.

Increase the flexibility of provision to facilitate the reconciliation of work and family life.

Foster cultural change through communication programs that reach out to parents from disadvantaged groups who are suspicious of leaving their youngest children in the care of 'strangers'. High-quality provision will also help to build trust.

Ensure legal entitlements are clear and transparent and are accompanied by outreach and information to parents from vulnerable backgrounds who may be less familiar with ECEC institutions, rules, and regulations.

Simplify administrative procedures/barriers arising from online application procedures or the need to navigate diverse funding schemes.

Encourage parental participation in ECEC and combine ECEC with home visits and other types of family/parenting support.

ECEC and children with disabilities

Specific barriers and challenges

Access to ECEC for children with disabilities varies widely across the EU. Often, mainstream instruments related to ECEC are not sufficiently adapted to take into consideration children with disabilities. ECEC is important for all children but is of critical importance to children with disabilities since: (a) it provides the necessary services and structures to identify and address developmental delays and disabilities (EI/EI, as reported in the healthcare sub-section above); and (b) it supports children who have been identified as being at risk or with developmental delays and disability to access the services needed, in health, education, and social protection.

In addition to the barriers of cost and availability that affect other children in precarious situations, children with disabilities often face barriers in relation to accessibility and a failure to adapt provision to take account of their particular developmental needs.

Given that children with disabilities often have multiple needs, it is particularly important that there is a coordinated and integrated approach to meet these needs. A barrier to achieving this can be the extent to which different agencies work in silos.

Another barrier is the lack of sensitization, knowledge and skills of the staff to adequately identify and respond to the needs of children with disabilities and their families.

Suggested actions

Policies should prioritize early intervention and outreach to parents from the birth of children with disabilities, with a view to developing a tailored and coordinated plan of support which focuses on the best interests of the child.

At EU level this could be assisted by developing a multi-sector instrument to help evaluate a child's best interests, which could also be used when assessing all children in precarious situations. As some disabilities may only become apparent at a later stage, the ongoing monitoring of all children is also advisable.

Where ECEC policies do not exist, or do not provide for services that are free, these should be developed or revised to give priority access for children with disabilities to ECEC services (including EI/EI) – free of charge, and as close to the child's home as possible to ensure that taking advantage of services does not imply family separation.

Develop coordinating mechanisms/structures between sectors/policies to guarantee a smooth transition of children with disabilities and their families between services and ensure their access to ECEC. This could be helped by consolidating under one legislative umbrella the provision of a variety of cross-sectoral services for children.

Decent housing

Barriers and challenges

Key barriers in accessing decent housing include low income, a lack of affordable privately rented housing, an insufficient supply of social housing leading to long waiting lists and the inadequate level of housing benefits for low-income families.

Children living in precarious family situations are particularly at risk of living in inadequate low-quality housing, suffering housing costs overburden, living in overcrowded households and experiencing energy poverty.

Suggested actions

In considering policies and programs to improve access of children in vulnerable situations to decent housing, it is important to take into account that housing policies have to address the functioning of a market which has at least three different modes of provision, requiring different but interdependent policies: private ownership, private rental and social housing.

This requires that special attention is given to policy measures that affect the market. In this regard, the impact of all possible measures on the market should be assessed both in the short and long term before they are implemented. They should also be assessed to ensure that they address the barriers highlighted above, especially those related to low income, the inadequate supply of affordable private dwellings for rent and the inadequate supply of social housing and of housing in general.

It is also important to take into account other factors that can interact with the housing market and affect access, such as the availability of public transport.

In addition, the following measures were identified by the Feasibility Study on the Child Guarantee, on the basis of successful policies in place in some Member States:

Ensure that the right to access adequate housing is established in law.

Develop a comprehensive strategy on access to housing and a strategy for fighting homelessness that gives particular attention to access by children in vulnerable situations and their families to decent-

quality affordable housing.

Increase the supply of affordable and social housing through measures such as:

- › increasing investment in social housing and prioritizing children in vulnerable situations in allocating social housing;
- › regulating the housing market to ensure an adequate supply of affordable housing, and security of tenure for low-income households including those with children;
- › rebalancing interventions in the housing market away from tax subsidies for home ownership towards addressing housing exclusion;
- › making the private rental market more accessible to vulnerable groups by means of incentive schemes and making landlord-tenant mediation more effective;
- › developing and investing in innovative solutions for affordable housing, such as community-based housing, activation of vacant stock and private/public collaboration;
- › developing services that provide dwellings from the private residential housing stock at a lower-than-market price to low-income tenants¹⁰⁸.
- › providing subsidies for landlords to make premises suitable for habitation, funding for local authorities for new buildings, and possibly using government buildings.

Address the issue of affordability through measures such as:

- › increasing the adequacy and availability of housing allowances and targeting them carefully in order to be effective, focusing inter alia on low-income households with children – housing allowances should take account of specific household needs, such as those of families with a large number of children and those of children with disabilities (families should not be penalized for the composition

¹⁰⁸ An example of this is the Belgian agencies immobilières sociales (social rental agencies). In Belgium there are tax incentives for owners to rent their dwelling below the market rate. The agencies provide secure conditions to owners, as there are guarantees in terms of rent payment and repairs of the dwelling in case of problems.

of their household);

- › avoiding eligibility criteria that are too strict and reduce the take-up of schemes;
- › introducing, where necessary, regulation of maximum rents, under conditions aimed at preventing a reduction in the supply of housing for rental.

Increase the legal protection of children and their families in eviction processes through measures such as:

- › creating specific funds for vulnerable groups with children who have lost their home due to eviction;
- › allowing evicted persons with dependent children who have lost their dwelling because of unpaid mortgage bills to remain there on a rental basis or until the local authority grants the tenant other suitable accommodation; and
- › ending forced evictions (i.e. without due process); and when evictions do occur, ensuring (on the basis of the 'housing first' approach) rapid rehousing, with intensive social support as needed.

Provide support for utility (water and electricity) bills and mediation mechanisms for managing payment default, as well as debt management, through measures such as:

- › providing cash transfers such as targeted winter heating assistance and social benefits for vulnerable groups;
- › providing subsidies to improve long-term energy efficiency;
- › requiring households to apply for debt counselling in order to prevent the disconnection of utilities; and
- › reforming the regulatory framework and working with energy providers to ensure the protection of vulnerable households with children against energy disconnection.

Introduce targeted exemption from house-ownership taxes or council tax as a means for municipal government to reduce financial pressures on owners with children.

Housing and children with disabilities

Specific barriers and challenges

Families with children with disabilities usually face two challenges:

inadequate housing (not corresponding to their needs) and

housing cost overburden.

For the most part, mainstream instruments related

to housing are not sufficiently adapted to take into account the needs of children with disabilities and are rather broad in nature.

Financial support to adapt living quarters to the needs of children with disabilities is often not available and children with a disability from a low-income or ethnic-minority background often live in unsuitable accommodation or in residential institutions.

Suggested actions

Establish the families of children with disabilities as a priority group for receiving housing allowances.

Develop instruments related to housing that are specific to children with disabilities and ensure the adaptability of housing to meet their particular needs.

Make children with disabilities, and especially those living in low-income families, a priority in social housing allocation and subsidized housing at the national level.

Provide financial support to the households of children with disabilities to allow them to carry out the necessary adaptations, or move them to an adequate dwelling.

Adequate nutrition

Barriers and challenges

The main barriers to adequate nutrition are:

living on a low income; in many Member States the

benefits systems and minimum-income standards are not sufficient to ensure a healthy diet for children.

the high cost of healthy food;

the lack of, or inadequate, meals in schools, ECEC centres and other public services and the lack of such provision during holidays;

lack of awareness of what constitutes a healthy diet and food supply;

marketing that promotes unhealthy food, leading to the incidence of overweight and obesity;

insufficient policies and programs to promote mother and child health, in particular breastfeeding.

Suggested actions

Ensure that income-support systems for families with children are adequate to provide sufficient means to ensure healthy nutrition for children.

Develop policies to mitigate inadequate nutrition, such as the provision of universal or targeted free nutritious healthy meals in ECEC provision and primary and secondary schools.

Targeted support needs to be provided in ways that avoid a stigmatizing effect that reduces take-up.

To ensure nutritional quality, enhance the training of professionals on providing healthy food, and regularly inspect catering services.

Develop educational activities on healthy food, such as school breakfasts that empower children to act as advocates for better nutrition in their families and communities.

Complement healthy nutrition programs with programs encouraging exercise (with adequate facilities). Such programs can have health benefits as well as potentially reducing obesity. Engage staff in such initiatives.

Develop schemes that can reach children in their home environments, such as food banks or meal-at-home programs to support households lacking sufficient food. It is important that such initiatives are as far as possible integrated with other support services and are as non-stigmatizing as possible.

Monitor children's health and nutritional status on a regular basis so as to identify problems arising from

inadequate nutrition (e.g. through social restaurants or food banks).

Promote mother and child health through programs to promote breastfeeding, by providing access to information materials and raising awareness concerning the importance of breastfeeding. Discourage marketing of breastmilk substitutes and promote breastfeeding facilities in workplaces and public venues.

Promote healthy food and healthy eating habits through measures such as: supporting only healthy food in schools and ECEC centres; taxes on fatty food and lower taxes on healthy basic food, as well as regulation of the vending of unhealthy products on public premises and greater control of their

advertising; public programs for family counselling and nutritional health; and health-promoting interventions related to nutritious and healthy food, as well as physical activity.

Encourage 'no fry' zones round schools to limit the availability of high-fat fast food.

Nutrition and children with disabilities

Specific barriers and challenges

A key barrier to ensuring adequate nutrition that is often especially acute for children with disabilities is low income. Children with disabilities are disproportionately more likely to be in poor families and low income is often a key factor in poor nutrition. Moreover, when children with disabilities have special dietary needs the impact of low income on poor nutrition can be further compounded. A further issue is that where policies are in place to address

problems of nutrition, such as through school meals, the special dietary needs of some children with disabilities are sometimes not taken into account.

Suggested actions

A twin-track approach is required to ensure that nutrition policies (mainstream) adequately address the nutrition needs of children with disabilities, and that additional disability-specific policies exist to provide 'nutrition-focused support'.

Child and family income support systems should take into account the additional costs of meeting specific dietary needs for some children with disabilities.

Policies in schools and other public services to ensure adequate nutrition should take into account the need to provide special diets to students with particular dietary needs.

Improve information and training on food and nutrition issues for professionals working with children, including

children with disabilities.

Give greater recognition of specific dietary requirements in national policies and guidance.

To sum up, the following recurring barriers to developing effective programmes in the five policy/service areas have been identified in the Feasibility Study on the Child Guarantee. These barriers need to be addressed since they hinder the access of vulnerable children to their social rights.

Lack of societal and political awareness of the extent of child poverty and social exclusion and the extent to which children in vulnerable situations do not have access to the 5 policy/service areas. The lack of awareness leads to a lack of political will and insufficient political priority being given to addressing the issue.

Lack of strategic approach: a key consequence of the lack of awareness and political will is often a failure to develop a strategic approach to ensuring that all children, especially those in vulnerable situations, have access to the five policy/service areas. This leads to inadequate and under-resourced provision and to piecemeal programmes and projects.

Gap between legislation and practice: gap between the recognition in national legislation of the rights of all children to access inclusive services and the actual practice on the ground. In many cases this is linked to underfinancing of core services, such that their effective delivery is limited and of poor quality. It can also reflect a failure of service providers to understand the full implications of children's rights enshrined in legislation.

Negative impact of income poverty: living in poverty hinders the ability of children and their families to access their key social rights in two ways: (i) the costs associated with accessing services can be a barrier; (ii) the day-to-day struggle to survive on a low income and the fear of stigmatisation can undermine self-confidence and initiative; this can reduce parents' energy and capacity to find the necessary information on their rights and to access services.

Fragmented systems and lack of coordination: the needs of children in vulnerable situations and their families are often complex and multiple, and cut across different policy/service areas. Thus, effective

child-centred cooperation across policy/service areas and programmes is needed. However, too often the delivery of policies is in policy 'silos', and there is a lack of coordination and cooperation between policy providers to ensure that their policies are mutually reinforcing and delivered in an integrated way.

Lack of child and parental involvement: if parents and children are not consulted and do not have their views and experiences taken into account in the development and implementation of policies there is a risk that those policies are implemented in ways that do not reflect their needs.

Lack of understanding of what constitutes inclusive and accessible services: although the rights of all children to access services may exist in legislation, sometimes there is insufficient awareness amongst policy makers and professionals as to what is necessary to make those services truly inclusive for children coming from vulnerable situations. Sometimes the culture and ways of working of services are not flexible nor aligned to the needs of children. Outdated views on the merits of separate development and segregated services can also persist if not challenged.

The issue of deinstitutionalisation

It is important to analyze the issue of deinstitutionalisation not only because the EC calls to end deinstitutionalisation of children and ensure that they are brought up in family settings in the community but also because many children with disabilities live in institutions.

All children have the need and the right to live and grow up with a family¹⁰⁹. The preamble of the Convention on the Rights of the Child (CRC) recognizes that for their "full and harmonious development", all children "should grow up in a family environment." The UN Convention on the Rights of Persons with Disabilities (CRPD) sets out that the best interests of the child are of paramount consideration in all decisions affecting them (Article 7(2)), and places clear obligations on States to protect the right to family life (Article 23) and to live and be included in the community (Article 19).

Barriers to deinstitutionalisation

Lack of, or insufficiently comprehensive, strategy:



109 Eric Rosenthal, "The Right of All Children to Grow Up with a Family under International Law: Implications for Placement in Orphanages, Residential Care, and Group Homes", 25 Buffalo Human Rights Law Review 101 (2019) in Joint response to the EC roadmap for the Child Guarantee by the ENIL, Validity Foundation and DRI.

although the Member States identified by the European Commission as in need of deinstitutionalisation reforms have developed a strategy for deinstitutionalisation, progress is very slow due to the lack of a clear and comprehensive implementation plan. In some Member States a deinstitutionalisation strategy is even missing.

Lack of political priority/will: some Member States seem reluctant to engage in deinstitutionalisation processes and more comprehensive alternative care reforms. This can often be reinforced by the myth of the low-cost/high-benefit of institutions and concern about the transitional costs of moving to community- and family-based alternatives.

lack of funding and investment in the appropriate policies and practices to lower the number of children in residential care (due to the lack of political will)

Public resistance and conflicts of interest: in some Member States, public opinion still supports residential care institutions, which are seen as an appropriate care and protection measure. In addition, there can be a conflict of interest for those involved in institutional care: the private sector as provider of institutions and profit maker and the staff concerned about losing their jobs.

Lack of strategies and vision: most national deinstitutionalisation policies have been criticized for their lack of a systemic or holistic approach. If the policy does not include measures to support family-based care options and prevention measures, the deinstitutionalisation policy cannot be sustainable. In addition, there is often a lack of continuous support after age 18.

Lack of data: a lack of adequate and reliable data to analyze the needs of children in alternative care or at risk of being separated from their families limits the ability of countries to develop and deliver effective strategies.

Poor management, underfinancing and a lack of social/community services: some strategies lack the adequate funding, clear timeframes/benchmarks, and the involvement of children, required to make them effective. In particular, low investment in alternative services (i.e., to support families before they break down; to support families while the child is in care; to invest in social care services; and to support foster carers and specialized foster carers for children with more complex needs) explains the slow pace and sometimes stagnation of the deinstitutionalisation process. Low salaries explain, in some Member States, the difficulty in recruiting foster carers.

Lack of prevention measures: institutionalization is frequently caused by a lack of adequate preventive measures offered by the state to families, such as counselling services for parents; the limited or unavailable provision of early intervention and financial, legal or psychological support; and a lack of adequate support and inclusive education for children with disabilities. This can lead to a gap between what is intended in legislation and what is actually happening on the ground.

Fragmented and uncoordinated systems: governance and coordination between the different levels and sectors of government involved in deinstitutionalisation present a major challenge in many Member States. In particular, relatively few of them have set up efficient modes of cooperation between the different sectors involved in the process of deinstitutionalisation, or more generally cooperation between the different sectors working on child protection.

Lack of monitoring and accountability: a failure to monitor and report on the development of a range of services in the community, including prevention, in order to eliminate the need for institutional care can slow progress toward effective deinstitutionalisation.

Lack of child involvement: too often, children who experience the care system are not consulted on the decisions concerning their care and are not involved in determining the support and services they need.

Suggested actions

Develop comprehensive child-centred, relationship-based, national plans and frameworks: ensure that there is a comprehensive national framework in place to end institutional care and develop family-based care with a clear plan for its progressive implementation.

Develop prevention policies: a focus on early intervention and strengthened preventive measures can be key in avoiding the unnecessary placement of children in care. A broad range of policies are relevant here: investing in family support services and home visiting programs; training programs on positive discipline and parenting skills; and housing support or other measures to alleviate the material poverty of families. To achieve this focus, invest in training aimed at changing the mentality and social norms among service providers. In addition, emphasize to policy makers that spending money today on prevention saves money tomorrow.

Expand good-quality family-based care, especially foster care and kinship care: this requires:

- › developing clear legal and policy frameworks;
- › setting clear national quality standards in order to ensure the best outcomes for the children in alternative care – all care settings must meet general minimum standards in terms of, for example, conditions and staffing, regime, financing, protection and access to basic services (notably education and health);
- › recruiting and training foster carers;
- › developing policies to promote kinship care by reinforcing the capacities of the extended family to care for children;
- › increasing resources for family-based care including transferring resources from institutional care; and
- › putting in place effective independent monitoring/inspection/complaints systems to ensure quality standards are achieved and maintained and to

ensure there is an effective regulatory framework to close residential care or suspend a foster family or foster care provider that does not comply with national standards, with the possibility to prosecute through the criminal justice system.

Develop professional support services in the community: in particular, invest in the development of local public social services and pro-active child protection services. This requires an investment in human capacity: that is, adequate numbers, enhanced training, adequate funding, good salaries and realistic workloads. Build trust in services through developing a pro-active approach and avoiding a repressive approach that creates a fear of child protection services.

Put the best interests of the child at the centre of policy implementation: develop tailored individual packages and ongoing support for each individual child. This involves:

- › looking at children's needs holistically and developing multidimensional needs assessments;
- › ensuring children's participation in decisions related to their placement;
- › putting in place a gatekeeping mechanism which is capable of ensuring that children are admitted only if all possible means of keeping them with their parents or extended family have been examined (e.g. mediation and family group conferencing);
- › working with the family of origin while the child is in alternative care and fostering contact with the families of origin, with a view to creating the conditions for children's reintegration into their family of origin; and
- › ensuring effective coordination and harmonization of systems so as to enable coordinated cross sectoral interventions – social services can play a key role in ensuring the coordination of services in the best interests of the child.

Recognize the right of a child to be heard: involve children in decisions regarding their placement and put in place complaints mechanisms to enable children in care to raise issues of concern. In addition, involve children in alternative care in the monitoring and improvement of the system. Strengthen the voices of parents and children in relation to care issues by providing access to legal recourse and by supporting parent groups and parent advocacy networks; foster care networks; and children in care

and leaving care networks.

Develop policies related to leaving care: put in place measures to support the transition of young people from out-of-home care to independent living. This means ensuring their access to essential services in

areas such as education, housing, employment, and healthcare (including mentoring and psychological support). There is a need for an integrated approach after 18 with financial support and counselling for independent living.

3.2 Overall conclusions from the Feasibility Study on the Child Guarantee

This section presents (in a reduced/summarized format¹¹⁰) the 15 conclusions that the Feasibility Study found to be critical to assess the need for and the feasibility of establishing a Child Guarantee aimed at ensuring that all children in vulnerable situations have access to the five policy/service areas identified (i.e., free healthcare, free education, free early childhood education and care (ECEC), decent housing and adequate nutrition).

1. Access by children in vulnerable situations to the five policy/service areas needs to be improved. In spite of the lack of data on children, which is a problem that poses important concerns for the analysis¹¹¹, the evidence presented shows that the national and EU policy instruments and/or the way these instruments are used do not guarantee access by vulnerable children to their fundamental rights in EU Member States.
2. Failure to ensure access to the five policy/service areas has short- and long-term negative consequences for children and society
3. Lack of access to the five policy/service areas represents a failure to uphold children's rights
4. It is feasible to guarantee access to the five policy/service areas
5. Efforts to ensure access to the five policy/service areas should focus on all children in vulnerable situations
6. Children who are most disadvantaged need more support. A twin-track approach is key to increasing access and inclusivity.
7. Ensuring access to the five policy/service areas on its own is not sufficient: mainstream services also need to be inclusive and of high quality so as to ensure that children in vulnerable situations benefit fully and avoid stigma and segregation.
8. Ensuring access to the five policy/service areas is necessary but not sufficient to tackle child poverty and social exclusion. There is a need to formally link the establishment of the Child Guarantee to continued efforts to implement the 2013 Recommendation. In particular, although ensuring access to the five areas under scrutiny would be an important contribution to tackling child poverty (pillar no.2 of the 2013 Recommendation) it would not be sufficient. The other two pillars (no.1 access to income and no. 3 children's participation) should also be addressed.
9. Ensuring access to the five policy/service areas requires a comprehensive approach at Member State level. It is not sufficient to just to look at specific policies in the five areas, but to take into account appropriate policies and programs in other areas for example: policies to ensure adequate income; employment policies; fiscal policies; policies to develop social services for children; policies to ensure the participation of children; policies to combat discrimination; policies to promote children's rights; anti-discrimination policies; and policies and practices to improve data collection and analysis relating to children.
10. Primary responsibility for ensuring access to the five PAs rests with Member States, but EU action to support them is feasible as the EU has the legal basis

to act to support and encourage Member States' activities in this area. In practical terms it can do so by providing political leadership and using to the full two instruments which the EU can mobilize to support and encourage Member States in areas of shared concern: policy coordination and guidance (including research, innovation and knowledge sharing) and financial support.

11. Existing efforts by the EU to support and encourage Member States to ensure access by children in vulnerable situations are helpful, but a new EU initiative could bring real added value and a more effective use of EU instruments. Existing EU efforts to support and encourage Member States to ensure access by children in vulnerable situations to the five policy/service areas have not succeeded. The implementation of the 2013 EU Recommendation did not have the expected impact and EU funds have not been used as extensively or strategically as they could have been¹¹². The Child Guarantee could be an effective way of ensuring that a high political priority is given to supporting children in vulnerable situations and that EU instruments are used more effectively in this regard in the future.
12. EU funds have considerable potential to play a more effective and strategic role in supporting access to the five policy/service areas. A well-focused initiative in the forthcoming 2021-2027 programming framework could play a key role in ensuring that increased resources are allocated and used more strategically in favor of children in vulnerable situations so as to ensure their access to their rights (See also chapter 4).
13. EU political leadership will be important in encouraging Member States to ensure access to the five policy/service areas. The issue of children's access to these rights should be put much more visibly and vigorously at the centre of the political agenda¹¹³.
14. Ensure that implementing the Child Guarantee is mainstreamed across all relevant DGs and that there is regular inter-service coordination and cooperation. Ensuring access by children to the five policy/service areas needs action across quite a wide range of different policy areas at the Member State level. Thus, to support and encourage Member States to ensure effective access to these five areas, it will be important that related EU measures are mainstreamed across all relevant Directorates-General (DGs) and that there is regular inter-service coordination and cooperation. Ensure that the DGs concerned¹¹⁴ work together towards the successful realization of the Child Guarantee.
15. There is a considerable popular and political demand for a Child Guarantee. Widespread support amongst policy makers and practitioners¹¹⁵.

¹¹⁰ Full text for the overall conclusions can be found in the Feasibility Report for a Child Guarantee (2020) Summary Report.

¹¹¹ The collection of homogeneous, comparable and disaggregated child-specific data and indicators is of paramount importance. At the moment there is a lack of data and sample sizes are very often too small to lead to robust conclusions.

¹¹² Frazer H. and Marlier E. (2017), *Progress across Europe in the Implementation of the 2013 EU Recommendation on 'Investing in Children: Breaking the cycle of disadvantage': A study of national policies*, European Social Policy Network (ESPN), Brussels: European Commission.

¹¹³ Experience over the years has shown that in key areas of social policy and social rights the EU's impact is greatest when its legal, policy coordination/guidance and funding instruments are underpinned by strong political commitment and leadership by the Council of the EU, the European Commission and the European Parliament.

¹¹⁴ The Directorate Generals (DGs) concerned include especially DG Education, Youth, Sport and Culture, DG Employment, Social Affairs and Inclusion, DG Eurostat – European Statistics, DG Health and Food Safety, DG Justice, DG Migration and Home Affairs, DG Regional and Urban Policy, DG Research and Innovation, and Secretariat General (SG).

¹¹⁵ Political support is evident from the clear political demand by the European Parliament for the establishment of a CG and in the clear statement in favour of a CG in the European Commission President's political priorities: 'To support every child in need, I will create the European Child Guarantee, picking up on the idea proposed by the European Parliament. This tool will help ensure that every child in Europe at risk of poverty or social exclusion has access to the most basic of rights like healthcare and education.' This has been further reflected in the President's allocation of specific responsibilities for developing a CG in the mission letters of two Commissioners (Dubravka Šuica, Commission Vice-President for Democracy and Demography and Nicolas Schmit, Commissioner for Jobs and Social Rights).

4. The use of EU funding in support of the Child Guarantee

4.1 EU funds and children

There is a variety of EU funds that can apply to children, e.g.:

the European Structural and Investment Funds (ESIF)
- and within ESIF:

- › the European Social Fund (ESF)
- › the European Regional Development Fund (ERDF)
- › the European Agricultural Fund for Rural Development (EAFRD)

the Fund for European Aid to the Most Deprived (FEAD)

the Asylum, Migration and Integration Fund (AMIF)

the EU school scheme.

However, findings from the Feasibility Study on the Child Guarantee show that these funds have not been optimally used to support the implementation of the 2013 EU Recommendation on Investing in Children nor to improve access by children in vulnerable situations to the five policy/service areas.

Box 10 - EU opportunities to invest in children - 2014-2020 programming period

In the 2014-2020 programming period, the ESIF have concentrated on the Europe 2020 agenda, which aimed at promoting 'smart, sustainable and inclusive growth' in the EU, and its five target areas. Targets that influence the living conditions of children are: education (rates of early school-leaving below 10%); poverty and social exclusion (at least 20 million fewer people in, or at risk of, poverty/social exclusion); and, indirectly, employment (75% of people aged 20-64 to be in work).

Under the ESF regulations, Member States are asked to earmark at least 20% of their ESF spending for 'promoting social inclusion, combating poverty and discrimination'. Although this target is a great achievement in itself, Member States tend to allocate this funding to the active inclusion priority, which is often interpreted very broadly, thus leaving an open question as to the extent to which it clearly targets populations experiencing poverty and exclusion.

Two of the thematic objectives (TOs) of the ESF, TO 9 'promoting social inclusion and combating poverty' and TO 10 'investing in education, skills and life-long learning', are closely related to the children in the four target groups presented in the Feasibility Study on the Child Guarantee. TO 8 'promoting employment and supporting labor mobility' is also related as it seeks to promote 'equality between men and women and reconciliation between work and private life'. Additionally, TO 11 'enhancing institutional capacity and ensuring an efficient public administration' allows for institutional reforms in this area. Although the TOs of the ERDF and ESF do not refer specifically to children at risk of poverty or social exclusion, the regulations indicate that funding may be used to improve education, health/social infrastructure, and access to affordable and high-quality services, including: out-of-school care and childcare; interventions preventing early school-leaving; and promoting equal access to good-quality early-childhood, primary, and secondary education.

In short, the regulations give many opportunities to invest in children, and allow the Member States to draft their respective OPs according to their needs and priorities in agreement with the Commission.

In the 2014-2020 period:

The ESF has been important for: supporting social inclusion measures; reducing and preventing early school-leaving; promoting equal access to early-childhood, primary, and secondary education; promoting access to affordable, sustainable, and high quality services; and the socio-economic integration of marginalized communities such as the Roma.

The ERDF has helped develop education facilities, promoting social inclusion including the development of alternative care, and developing ECEC infrastructure.

The FEAD and AMIF have also supported children in vulnerable situations.

Notwithstanding the positive innovations in the way EU funds have been used to support disadvantaged children which included:

- a micro-territorial approach;
- the development of integrated multi-fund programs;
- support for administrative reforms;
- the promotion of intergovernmental cooperation and civil society participation; and
- reinforced attention to school drop-out and ECEC.

several weaknesses have been identified in their use:

- lack of data and systematic evaluations on interventions targeted at or affecting children's rights;
- EU-level priorities on investing in children not linked to specific indicators on children's well-being;
- an insufficiently clear focus on vulnerable children;
- complex administrative systems;
- low absorption capacity in some Member States;

limited connection between the use of EU funds and the development of national policies, and between the use of funds and national strategic policy frameworks;

the use of EU funds not being (sufficiently) embedded in local policies.

Thus, available EU funds have not been used in a strategic way that leads to better and more sustainable national policies and programs.

4.2 EU funds in support of the Child Guarantee- main suggestions for the next funding round

The following suggestions can be helpful in informing the current negotiations on the 2021-2027 EU funding round to ensure that the proposed Child Guarantee is effectively supported by EU funds:

Make support for children in vulnerable situations a specific priority for the 2021- 2027 funding period.

Mobilize all EU funds and financial instruments and extend the priority for supporting children in vulnerable situations across all of them (i.e. the ESF+ in all its strands – shared management, employment and social innovation, and health – the ERDF, AMF, EIB, InvestEU, Structural Reform Support Program (SRSP) and Erasmus+) so that there is a significant intervention in all domains, for example:

the ERDF regulation could include in its ‘priorities’ and its indicators the needs of children. Eligible measures should refer at least to housing for families in precarious situations, equipment for education, healthcare and early care as well as other support;

the AMF could in particular target vulnerable

Drawing on the Feasibility Study on a Child Guarantee findings, the following section presents a list of suggestions outlined in the report as to how EU funds might be best used in the future to support the implementation of the Child Guarantee in the 2021-2027 MFF.

children and applicants for international protection with special reception and/or procedural needs, contribute to ensure the effective protection of children in migration (in particular unaccompanied minors), and focus on inclusive education and care by providing alternative forms of care, integrated into existing child protection systems;

the InvestEU program 2021-2027¹¹⁶ could be mobilized via its ‘social investment and skills policy window’ to attract additional private investment supporting projects in domains relevant to the CG, such as: measures to promote education, training, and related services; social infrastructure (including health and educational infrastructure as well as social and student housing); social innovation; health; inclusion and accessibility; cultural and creative activities with a social goal; and integration of vulnerable people, including third-country nationals;

special attention could be paid to Erasmus+ ensuring outreach to people with fewer opportunities and contributing to improved policy developments and cooperation between schools and educational institutions, with the aim of strengthening inclusive

education; and

the European Reform Support Program could be used by Member States to strengthen their administrative capacity and to undertake reforms in the areas related to the key children’s social rights as well as to improve mutual learning.

Promote an integrated approach whereby different funds can be combined to support different aspects of an initiative aimed at children in vulnerable situations (e.g. combine ERDF and ESF+ funding to establish early-care centres and provide services to the children).

Explore the potential of the ‘social investment and skills’ window of the InvestEU program to support, through repayable finance, projects promoted by civil society organizations and investors in the area of ECEC and support to children – as well as, where appropriate, to provide advisory support and capacity building to interested stakeholders.

Increase and earmark or reserve a specific minimum percentage of ESF+ funding to be used for supporting children in vulnerable situations.

Closely link the use of these EU funds to the implementation of the Child Guarantee and connect the Child Guarantee with national policies related to the implementation of the five key social rights, the 2013 Recommendation¹¹⁷ and Principle 11 of the EPSR¹¹⁸.

Ensure that EU funds contribute to better compliance by national policies with international and European human rights instruments, ensuring that:

1. all funded programs are following a child rights-based approach and comply with the CFR but also with the UNCRC and the UNCRPD; and
2. no funds are used to support projects that are contrary to children’s rights and international

standards (e.g., no funds for institutionalization, discrimination or segregation).

Require EU funds to be used in ways that will both trigger major reforms in Member States (which will lead to the establishment of appropriate, sustainable and properly funded policies and systems) and also promote social innovation and experimentation with a view to identifying, evaluating and scaling up successful interventions in order to integrate them in national policies and mainstream service provision.

¹¹⁶ The InvestEU program 2021-2027 seeks to attract additional private financing to a wide range of operations and beneficiaries, designed to trigger up to €650 billion in additional investment across the EU. The programme addresses investment gaps in different policy areas which are often held back by persistent market failures. It will aim to support only those projects where financing could not be obtained at all, or not on the required terms, without InvestEU support. It will also target higher-risk projects in specific areas. One of its four policy windows is dedicated to social investment and skills,

¹¹⁷ Make it a condition that EU funds to support children in vulnerable situations are used in a strategic manner and are linked to national strategies to combat child poverty and social exclusion which, in line with the 2013 Recommendation and the Child Guarantee, would need to identify gaps and set priorities for furthering: (a) children’s access to adequate resources; (b) children’s access to adequate services (in particular access by children in vulnerable situations to the five PAs); and (c) children’s participation in decisions that affect their lives.

¹¹⁸ https://ec.europa.eu/commission/sites/beta-political/files/social-summit-european-pillar-social-rights-booklet_en.pdf Principle no.11. Childcare and support to children. a. Children have the right to affordable early childhood education and care of good quality. b. Children have the right to protection from poverty. Children from disadvantaged backgrounds have the right to specific measures to enhance equal opportunities.

Improve access to and the effective use of EU funding, especially for local authorities, social partners, NGOs and smaller local community projects, for instance by:

providing support in the planning process of the projects, through technical assistance, feedback, technical review, checking of the fulfilment of conditions before approving the OPs, peer-learning etc;

involving local authorities, NGOs and social partners in all stages of the program (i.e. planning, preparation, implementation and monitoring);

facilitating the process of implementation by simplifying the rules, allowing some flexibility in the eligible cost, being smart in the mechanisms of control, advancing pre-finance and reducing the rate of national contribution; and

providing technical support in the process of implementation through training activities, elaboration of guidance and tools, advising on monitoring, and providing information on existing experiences and initiatives.

Allow a wide range of measures to be eligible for support in order to enable the most appropriate approach to be implemented in each Member State and then ensure that projects are properly planned and designed, tailored to local and individual needs and located close to the children targeted.

Ensure that EU funds are used to complement, not compensate for, national funds – that is, EU funds should not be used to replace national financing where policies are deficient but to support and complement national funding by always looking for synergies and following the ‘additionality’ principle.

Reinforce the partnership principle at the heart of the use of EU funds to support the Child Guarantee, as this would encourage Member States to meaningfully involve civil society organizations and social partners in the design, implementation, monitoring, and evaluation of national strategies on poverty reduction and social inclusion. In this regard, it is important to:

involve social partners, local and regional authorities, and civil society at all stages;

enhance support for civil society participation;

ensure a role for fundamental rights bodies; and

improve the quality of consultation with civil society.

Improve the evaluation of programs supporting children in vulnerable situations through:

putting in place arrangements at EU level for closely monitoring and reporting on the ways EU funds are being used to support the implementation of the Child Guarantee;

encouraging the development of well conducted *ex ante* impact assessments and ensuring that *ex post* impact evaluations are prepared as a precondition of EU financing;

supporting Member States in the way evaluations are developed and in using counterfactual methods that can measure both effectiveness and impact; and

increasing the role of NGOs in the monitoring mechanisms of EU funds at national level.

Support investment in trained staff used to working with children in vulnerable situations and developing inclusive services and pay them decent wages (the role of staff from the same community as the children concerned can be instrumental).

Enhance the use of EU funds to support the exchange of knowledge and peer learning between Member States.

4.3 How to use EU funds in the specific policy/service areas

This section presents specific proposals of how EU funds could be used in the different policy/ services areas to support the implementation of a Child Guarantee¹¹⁹.

Access to health services

Allocate resources that lower-income EU Member States could call on:

- › to support the cost of reimbursing co-payments, over-the-counter costs for approved medical items (e.g., provision of glasses, prostheses and medicines), and essential out-of-pocket costs for attending appointments, for parents/carers;
- › for the development or enhancement of child health centres/children’s centres/primary care centres

Allocate resources to support training of health service personnel which could:

- › support Member States affected by outward medical migration or by significant retirement numbers, by helping them to train primary care doctors in child health, with a particular focus on vulnerable children’s healthcare needs and the

creation of innovative services;

- › support Member States affected by a lack of community child health and hospital pediatric nurses;
- › support Member States with inadequate child mental health services, by helping them to train

children’s mental health professionals.

Support research into virtual and digital services to cover locations with over-stretched services, and to reach hard-to-reach families.

Support the development of early years’ health checks with a view to the early identification of problems such as malnutrition.

Access to education

Allocate EU funds to support inclusive education initiatives, rather than initiatives with a focus on individualized approaches in education or initiatives that maintain the dual-track system.

Support the development of schemes to improve affordability and address financial barriers to accessing education (e.g., school materials, school clothes and shoes (uniforms), transport and after-school activities).

Invest in improving teacher training and capacity building, to develop more inclusive schooling.

Ensure that EU funds are not used to maintain

educational segregation for children in vulnerable situations and prioritize programs that end segregation in schools and promote the inclusion of children in vulnerable situations (especially Roma children, children with disabilities, and children from a migrant background) – for example, by providing

119 The contents from this section come from the Feasibility Study on the Child Guarantee Report.

support for tutoring and remedial classes; teacher training and improving the physical accessibility of schools.

Prioritize an integrated approach of EU resources¹²⁰ (i.e., combining resources from different funds)

Support initiatives to develop 'extended schools' that pursue integrated initiatives to meet the multidimensional needs of children in vulnerable situations (e.g., covering healthcare, social care, language stimulation, cultural enrichment and psychological support).

Prioritize initiatives focused on equity in school funding systems which address disparities in school funding.

Encourage initiatives to support children in transition: from special schools to mainstream schools, between different school levels, and from education to work.

Support the development of after-school programs for when parents are not at home.

Provide support to weaker/smaller NGOs and schools in preparing applications for, and management of, extra funds.

Develop alternative education strategies (informal education, popular education and mobile street teams) to reach children on the streets and support the work of social street workers.

Access to ECEC and ECI

Provide support for the development of early childhood intervention (ECI) and support initiatives:

- › support the development and strengthening of social services and social work at the community level to help reach children in the most disadvantaged situations and their families;
- › support the development of parenting and family support services;
- › support the development of a range of choices for

parents in order for them to be able to take care of their children, especially regarding children under 3;

- › support the development of early childhood intervention systems which provide early psycho-social support services to stabilize families and strengthen parental capabilities – and do this through strong inter-sectoral collaboration between education, health and social services.

Support municipalities to develop, run and monitor good-quality ECEC services, with an emphasis on including children in vulnerable situations and embracing diversity.

Support initiatives to build the capacity of the ECEC workforce by investing in in-service and pre-service training and professionalization.

promote cultural awareness and anti-discrimination training.

Invest in the construction, modernization and equipment of childcare infrastructure.

Support financially the realization of the EU quality framework for ECEC.

Give particular priority to providing funding for ECEC in regions that are most deprived.

Access to decent housing

Establish a housing guarantee fund, which could lay the basis of a housing fund available in the EU for families with children. The fund would facilitate access to housing, for instance by removing barriers to access by families with children to decent housing (e.g. by providing small loans to pay the rent-guarantee). The fund could also provide loans similar to the Spanish 'social housing fund'¹²¹ enabling families with children below 18 to stay in their home and rent it instead of being evicted.

ESIF (mainly the ERDF and ESF) have great potential to address the housing situation of Roma people¹²² by focusing investment on housing needs, particularly for the most disadvantaged groups.

A Child Guarantee could include an EU-wide guarantee to support municipalities in providing financial support to low-income households with a child with disability to adapt their dwellings to their living needs or move and live in an adequate dwelling.

Access to adequate nutrition

Use EU funds to tackle malnutrition by supporting the development of nutritious school meals and ECEC meals programs

Support educational initiatives to promote healthy eating that enable children to be empowered and act as advocates for better nutrition in their families and communities and that support parents in ensuring healthy food for their children, for example:

- › organizing food revolution days in kindergartens;
- › organizing cooking classes for children in ECEC settings and schools;
- › giving children experience of growing, cooking and eating their own food;
- › giving parents advice on: food preparation and storage; cooking workshops; educational activities to promote health nutrition; personal cleanliness; managing the household; how to reduce overweight and obesity in children and adolescents; and healthy eating habits.

Under FEAD projects, link the provision of food (e.g. through food banks) with accompanying services.

Support programs to promote breastfeeding to ensure that children have the best start in life.

Children with disabilities

Include mention of the UNCRPD in the enabling conditions but, in order to avoid misuse of funds, insist on greater clarity and further provisions in the regulations governing EU funds so that accessibility, social inclusion, and deinstitutionalisation are prioritized when devising EU-funded measures for children with disabilities.

Ensure that existing funding, such as the ESIF and other relevant EU funds already in use, is aimed at: developing support services for children with disabilities and their families in local communities; fostering deinstitutionalisation; preventing any new institutionalization; and promoting social inclusion and access to mainstream, inclusive, good-quality education for children with disabilities.

Funding should not be used in ways that are inconsistent with obligations under the UNCRC and UNCRPD.

Provide additional funding to support Member States that are committed to developing disability-inclusive policies.

Set up an independent budget line, with sufficient funding, for guaranteeing that structured dialogue across institutions, agencies, and bodies includes meaningful consultation with and the participation of children with disabilities.

Provide funding support for priority areas in inclusive education that have a significant impact on the participation of children with disabilities (e.g. teacher education, competence-based curricula, reasonable accommodation and accessibility).

Reconsider the priorities of the Erasmus+ program to bring them into line with the UNCRPD. For example, the thematic areas of the projects that are funded should address issues related to inclusive education. In addition, if an Erasmus program targets people with disabilities, this target group would need to be directly involved in planning, implementation and monitoring. The application procedures that are in place for the Erasmus+ should be improved in order for them to be 'disability inclusive'.

Reinforce the alignment with future European Disability Strategies

¹²⁰ For example: Use of ESF resources for substantive and organizational changes in education towards inclusive education; ERDF resources to adjust the educational infrastructure; AMIF resources to integrate refugee children into the same schools; FEAD resources to fund material support and healthy school meals; and Erasmus+ resources to develop and exchange both policy and concrete materials and methodologies.

¹²¹ Fondo Social de Vivienda -FSV

¹²² As pointed out by the European Network on Roma Inclusion (EU Roma Network)

5. Integration and validation of findings

The aim of this section is to integrate the main findings from previous sections and to offer “validated” insights that take into account the views of stakeholders in order to provide valuable contributions for a successful implementation of the Child Guarantee. Specifically, the integration of findings from previous sections concerns:

Findings from the Youth Guarantee analysis (Chapter 2)

Findings from the 2020 Feasibility Study on the Child Guarantee (Chapter 3)

Findings from other key publications that, although they do not recall a specific section/chapter in the report, have been consulted and relevant findings included in the current chapter. In particular:

- › 2013 EC’s Recommendation on Investing in Children & Implementation reports
- › Council recommendation and Staff Working paper on high quality Early Childhood Education and Care systems (2018)
- › EC Roadmap Communication (2020): Delivering for Children: an EU strategy on the rights of the child.
- › EC SWD (2020) European Disability Strategy Evaluation
- › EC Activation measures for young people in vulnerable situations, Social Europe (2018)
- › Feedback to the EC’s Consultation on the Child Guarantee (2020) (83 contributions from NGOs, public authorities, associations available online at the EC’s portal¹²³).

The key questions this section/exercise aims to answer is: what have we learnt from previous (similar) experiences? Is there something we have learnt from the Youth Guarantee that can be useful or that needs to be

taken into account when designing and implementing the Child Guarantee? What have we learnt from the Feasibility Study on the Child Guarantee? What are the key issues/recurring barriers that emerged from the study that need to be taken into account to make the Child Guarantee impactful? And last but not least: what is the opinion of key stakeholders? What is the reality “on the ground”? What are their views regarding the shaping of Child Guarantee in practice?

The main findings have been classified/grouped within the following 5 key broad areas that have been identified by the Research Team in order to facilitate the collection of information from the different above-mentioned sources:

1. Target group
2. Access to services and adaptability
3. Governance and Resources
4. Collaborative approach and synergies
5. Monitoring

These findings were presented to key EU stakeholders and were open for discussion and feedback. The “validation” by stakeholders was done through Focus Groups and interviews carried out to a selected sample of 12 participants from 8 Member States representing service providers, NGOs, academic experts, associations and umbrella organizations during the month of December 2020 and January 2021. Stakeholders were asked to provide insights on barriers, enablers and recommendations for a successful implementation of the Child Guarantee, especially for children with disabilities. The Member States selected cover different geographies with diverse health and social care systems: Scandinavian/Nordic countries (Finland and Sweden), Central European countries (Belgium) Southern countries (Spain, Greece and Italy) and Eastern European countries (Bulgaria and Romania).

The final list of stakeholders is presented below (a detailed table can be found in Annex):

1. Kirsi Konola (KVPS, Finland)
2. Agapi Papadaki (Amimoni, Greece)
3. Luisa Fazzi (Italian Disability Forum and Women’s group of EDF, Italy)
4. Alexandra Johari (Institute for Public Policy, Romania)
5. Enrico Tormen (Eurochild, Belgium)
6. Borislava Cherkezova (KarinDom, Bulgaria)
7. Andreia Moraru (Dizabnet, Romania)
8. Marleen Clissen (Network of Catholic Schools Flanders, Belgium)
9. Katerina Nanou (Save the Children, Belgium)
10. Slavka Kukova (Academic Network of European Disability Experts- ANED, Bulgaria)
11. Ana Jurado (Ginso, Spain)
12. Susanna Laurin (Funka, Sweden)

The following paragraphs present the main findings by key area.

5.1 Key area no.1 Target group

Although the target group of the Youth Guarantee is different from the target group of the Child Guarantee¹²⁴, some issues that emerged in the evaluations of the Youth Guarantee can be useful and need to be taken into account when designing the Child Guarantee. In particular:

Evaluations of the Youth Guarantee scheme revealed that there was not a clear picture of NEETs. A commonly agreed definition of young people grouped under NEET was missing. Engaging with NEETs, many of whom are not registered at Public Employment Services was essential to enhance the impact of the Youth Guarantee instrument. However, despite increased efforts by Member States to improve outreach, the identification of potential beneficiaries of the Youth Guarantee remained partial.

Evaluations agreed that the Youth Guarantee failed to reach the most vulnerable NEET groups. It failed to identify and assist them. The most vulnerable young people, who are the ones that would have needed and benefited most from the Youth Guarantee were under-represented among the beneficiaries of the instrument. Evaluators agreed that the Youth Guarantee interventions often remained insufficiently adapted to the needs of those facing multiple barriers such as poverty, social exclusion, disability and ethnic discrimination. This being the result of a number of

factors, including a limited knowledge of the diversity of the NEET population and of the specific needs of different NEET groups, amongst others. In the scope of the Youth Guarantee there is thus a need for better access to data on NEETs (disaggregated data would be needed) and also for more efficient outreach strategies.

A lesson learnt from the Youth Guarantee is that a clear picture of the target group in terms of size, characteristics, composition, and needs together with good quality, homogeneous, comparable and disaggregated data are needed if supporting schemes are to be successful and impactful.

The Child Guarantee focuses on vulnerable children and the Feasibility Study on the Child Guarantee identified 4 target groups that present a high degree of vulnerability: children in institutions, children with disabilities, children with migrant background (including refugees) and children living in precarious family situations). One of the main warnings of the Feasibility Study was the lack of data on children. From the very first pages, the study points out the lack of child-specific data and indicators as a major weakness that threatens the Child Guarantee and any intervention on children. Clarity regarding issues of size and definition of the target groups should be the first step of any intervention. However, to date, there is no clear picture of the situation of vulnerable children in the Member States due to the lack of quality,

123 <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12565-European-Child-Guarantee->

124 NEET young people not in employment nor in education or training in the Youth Guarantee and vulnerable children in the Child Guarantee

reliability, coverage, and limitations of the information/data available and, as a consequence, the total size of the population to be covered remains largely unknown.

The majority of stakeholders consulted in the EC public consultation on the Child Guarantee also agreed on the need to have disaggregated, comparable data on children in the 4 target groups. The collection of disaggregated data on child health, wellbeing and social inclusion must be improved and harmonized. Although it is true that the four target groups are important, a child guarantee should focus on all children. Thus, the target group will include all children. This would imply to focus on prevention and early intervention so to prevent children from falling into a vulnerable condition. Regarding the focus of the Child Guarantee, it has also been noted that since child poverty is a matter of family poverty, the target should not only be the child but also the parents/family (*“There are no poor children in rich families”*). The issue of not only focusing on children and access to key services but on parents and access to resources will be further discussed in the following area when talking about the Child Guarantee and the 3 pillars of the 2013 EC Recommendation.

The stakeholders that participated in the Focus Groups/interviews confirmed the fact that the lack of data on children is a big issue in their countries. Mediterranean (IT, EL, ES) and Eastern European (BG, RO) country representatives emphasized the urgent need to implement effective data collection procedures and to have a good knowledge of the target groups and communities.

A proposal from improvement in this area calls for the need to *“create an efficient “information model” to ensure the collection of data on the target groups. An institution should be appointed to fulfil this role in a centralised manner. There should be clear guidelines on the information to be collected and how to collect it. It would also be necessary to establish the quality criteria and standards. (...) A problem may happen in countries (e.g., Romania) where different data collection is the responsibility of different ministries/departments (labour, education, health)”*. It was also mentioned that *“if the “information model” involves all stakeholders from the very beginning, then access to services, good quality and monitoring will be ensured”*. It was also suggested to create a common database and specific indicators on children. In countries where regions have a high degree of autonomy and there is no coordination, the risk is to have non-homogeneous data that will make comparisons very difficult if not impossible. *“A common*

database or registry of data on children at central level would be very useful”.

Regarding children with disabilities in some member states (e.g., Spain) there is not a clear definition of what disability is, and the definition varies across regions. *“Clear and homogenous criteria should be defined in order to define disability and avoid the existing differences across regions that lead to different levels of children protection and assistance”*.

For children with disabilities, it is crucial to overcome the severe lack of data on children with disabilities. The available data at EU level are not updated (latest figures from Eurostat are of 2017) and at national level might even be worst (in many countries there is a complete lack of data; for instance, in Italy there are no data on children with disabilities from 0-5 years). Data must be disaggregated by gender, age, kind of impairment, living in institution, at home, foster care. *“It is important to overcome the invisibility of children in the 4 target groups and in particular the invisibility of children with disabilities”*. In addition, it was also remarked that *“the condition of disability is a condition that goes beyond any attempt of rigid classification. In each of the target groups, the presence of children with disabilities is possible”*.

If the Child Guarantee will focus on the target groups selected in the Feasibility Study, then other target groups of children that are missing should be included in the Child Guarantee: children with development delays, children with behavioural problems and children in alternative care. It is very important to support the early stages of a child’s development to identify any delay and provide support in the first years. Also, children with behavioural problems need to be taken care of. For instance, in Romania, behavioural problems are common among children living in institutions and children living in poor communities. They need to be considered because they need intervention and special attention and support. Not only children in institutions should be targeted but also *“children in alternative care”* because also children living in small home communities or in foster care are vulnerable and need to be supported (and within this group, especially children with disabilities need extra support for entering into the labour market, or in secondary education or to have an independent live).

Another option is that the Child Guarantee leaves the choice of the target groups to the Member States. Member States decide what children should be

prioritized.

“Each MS should focus on the target groups that are more important for them”. The Child Guarantee can propose some target groups but the final decision on which target group to focus should be left to the Member States”.

For instance, *“the relevant target groups in Sweden*

would be migrants, with or without papers, especially children and young adult asylum seekers who come to Sweden without their families, as well as EU-migrants, mainly Roma people from Romania or Bulgaria. For this target group of non-Swedish children, the main problem will be to find them and to communicate with them. Thus, information and support measures will be needed to support them”.

5.2 Key area no.2 Access to services¹²⁵ and adaptability

The review of the Youth Guarantee evaluations revealed that the quality of the offers (employment, apprenticeship, traineeship, and continued education offers) and services (intermediation/support services/counselling) that young people received varied widely across countries and had not always been of the highest standards. The low quality of the offers has been a key issue since quality is a key factor highlighted in the definition of what constitutes a Youth Guarantee. The lack of a clear definition of what constitutes a good quality offer and of agreed quality standards may have hampered the effectiveness of the Youth Guarantee. Despite the guidance and quality criteria defined at EU level¹²⁶ for the offers, the specific quality framework designed for traineeships¹²⁷ and the measures taken to ensure quality (control visits, blacklisting, etc.) it has not been always possible for the majority of the Public Employment Service’s staff to systematically monitor placements and ensure quality. In addition to the quality of the offers and services, evaluators of the Youth Guarantee also highlighted the importance of flexibility and adaptation to the local context versus a *“one size fits all”* approach.

Thus, for young people to get as much value as possible out of the Youth Guarantee, it is necessary that the offers

and the services they receive are of high quality and for this, it is in turn necessary to have a clear definition of what high quality means in terms of well-defined criteria and standards.

The issue of high-quality services is also a recurring matter in the Child Guarantee Feasibility Study. The Study highlights the fact that not only ensuring access to services is fundamental but also that services must be truly inclusive and of high quality to fully benefit children in vulnerable situations and to avoid stigma and segregation of vulnerable children.

The Feasibility study proposes access to key fundamental services (education, including early childhood education and care, health, housing and nutrition) through a twin-track approach consisting of universal mainstream services for all children and additional support services for the most vulnerable. Every effort needs to be made to ensure that universal services for all children are developed in an inclusive way. The development of universal services that are in theory available to all children is not sufficient to ensure the access of children in vulnerable situations, unless those services are developed in ways which are truly inclusive and child-centred and recognize the particular

¹²⁵ The five key service areas: health, education, ECEC, decent housing and adequate nutrition have been complemented with *“leisure and cultural activities”*, which has been recently included as the 6th policy/service area.

¹²⁶ Quality criteria defined at EU level for the four types of offer (i.e. employment, continued education, apprenticeship and traineeships) <file:///C:/Users/Usuario/Downloads/FAQs%20on%20the%20Youth%20Guarantee.pdf>

¹²⁷ 2014 Quality Framework on Traineeships

needs that some children have¹²⁸. This is essential to addressing inequalities between children, to ensure that all children have a decent standard of living and to ensure that children in vulnerable situations have access to the same quality of services and the same opportunities as other children. Good-quality universal public services play a key role in ensuring all children have access to safety, opportunity and participation. In addition, vulnerable children may need specific additional or complementary services to meet their specific needs. Such specific services should not be seen as an alternative to accessing mainstream provision but as complementary and enabling.

To ensure high quality services, it is necessary to set up clear standards or criteria. The EU could contribute to develop EU-wide quality frameworks (like the European Quality Framework developed in the area of ECEC) and set common service standards, in order to guarantee high quality services in the five areas¹²⁹ and the Child Guarantee could promote the national application of these quality frameworks.

Also, although a service can be free, accessing it may involve additional costs which can act as barriers for children in vulnerable situations. It is therefore necessary to take into account all the costs of accessing a service, and Member States should have policies to ensure that such costs do not act as an access barrier.

The focus of the Feasibility Study on the Child Guarantee is on access to the five fundamental services

by vulnerable children. However, although ensuring access to services is key, access to resources, ensuring that children and their families have access to adequate income is often a prerequisite to enabling access to the five services. Thus, policies which support parents' access to a decent income through the labor market and effective child and family income support systems (as set out in the three-pillar approach of the 2013 EU Recommendation on Investing in children¹³⁰, in particular in pillar no.1) play a critical role to effectively tackle child poverty and social exclusion.

The need that Member States and the European Commission set the implementation of the Child Guarantee in the wider context of tackling child poverty and social exclusion based on the comprehensive three-pillar approach advocated in the 2013 Recommendation on Investing in Children has also been expressed by the stakeholders consulted in the EC Consultation on the Child Guarantee and by the experts consulted in this research work (see paragraphs below).

The EC consultation on the Child Guarantee revealed that several stakeholders agreed on the fact that focusing on children alone is not sufficient when tackling child poverty since child poverty is mainly a matter of family poverty. Thus, measures must be defined and applied also for the families of children in need. Supporting children cannot be separated from supporting their families; thus, not taking into account the family situation will only result in short-term improvements but not in the end of poverty or social

exclusion for the child¹³¹. So, the comprehensive three-pillar approach advocated in the 2013 Recommendation on Investing in Children is the appropriate approach. National strategies on reducing child poverty and social exclusion should include the important component of the families' access to adequate financial resources, the role of the welfare state, the labor market and the economy. The Child Guarantee and the 2013 Recommendation must be closely linked.

Stakeholders agreed on the importance of guaranteeing access to high-quality services and some of them mentioned the importance of:

1. not focusing only on physical health but also on the mental health (psychological well-being) of vulnerable children;
2. investing in programs that empower and protect children in the digital era. The Child Guarantee should encourage investment in digital literacy and comprehensive education (internet safety) to empower all children to navigate the digital world and make use of its opportunities without harm. Several organizations that directly work with children on the ground revealed that the COVID-19 has led to increased poverty and inequality, a rise in family stress, a significant loss of learning and contact with school and a widening of the digital gap. Mobile phones, tablets/computers, Internet connections of good quality and Internet literacy have become basic needs for children and their parents. Enabling them to access and to be capable to use these communication tools will contribute to better results in all policy areas of the Child Guarantee.
3. effective prevention and early intervention measures, to reduce inequalities at a young age and increase physical and mental health as well as cognitive and social skills, ensuring that children are better equipped to enter into adulthood. In line with this, the importance to focus on early childhood education and care (ECEC) interventions since the

first years of a child's life are vital for his/her future development and wellbeing.

4. ensuring decent salary, fair working conditions and continuous professional development for early childhood education staff.
5. transition measures need to be in place to ensure a smooth passage from childhood to youthhood. The Child Guarantee should promote these measures in close coordination with the Youth Guarantee. There must be policy coherence between the Youth and the Child Guarantees and they must support and complement each other.

Given the challenges faced by children with disabilities and the disproportionate impact of poverty and social exclusion of this group of children, the EU institutions should mainstream disability issues in all planned activities arising from the Child Guarantee.

As stated in the contribution of the European Disability Forum (EDF): "Households that have children with disabilities in the EU have been shown to be disproportionately at risk of poverty and social exclusion. This is in part due to many parents being unable to work because of lack of access to appropriate care facilities or personal assistance for their children¹³². It is an issue that affects women in particular, who often take on the role of informal carers. In other cases, it is the increased cost of living to make up for the inaccessibility of services, housing, public transport, or the need for personal assistance, that result in such households falling into poverty. Housing itself is also a persistent issue. Families regularly struggle to find housing that is accessible for persons with disabilities, and when they do the rent usually far exceeds what would need to be paid for an inaccessible property. There is also the issue of residential care, which is typically only used as a temporary solution for children without disabilities until they find foster families, but all too often becomes a permanent "solution" for children with disabilities, who remain institutionalized for most, if not all, of their

128 The measures that can help ensure that mainstream services are truly inclusive include: (i) raising awareness amongst staff of the rights and needs of children in vulnerable situations, through training and regular reviews; (ii) focusing on improving quality through methods such as providing guidance to service providers on how to ensure inclusive services, or setting EU standards on quality and then translating these to national/sub-national levels; (iii) ensuring services are adequately resourced and staffed to develop truly inclusive services; (iv) when gaps in universal services arise for unavoidable resource reasons, ensuring that these are in localities or services that do not hit the most vulnerable children hardest (recognizing that the most vocal families may not be the most needy); (v) promoting an individual, child-centred approach based on a multidimensional needs-assessment.

129 The 2019 Council Recommendation on high-quality ECEC systems, which includes a European Quality Framework, is an

example that could be followed in other areas.

130 1.access to adequate resources, 2.access to affordable good-quality services and 3. children's right to participate in decision making.

131 Parents' participation in the labor market in decent jobs, fair minimum wages, access to adequate unemployment benefit and minimum income, as well as non-stigmatizing in-kind support and tailored benefits are crucial components of preventing and tackling child poverty and social exclusion. This is particularly crucial in the context of COVID-19 which is generating increased child and family poverty and social exclusion due to reduced working, rising unemployment, low levels of income support and rising prices. <http://www.alliance4investinginchildren.eu/joint-statement-on-protecting-children-and-their-families-duringand-after-the-covid19-crisis/>

132 https://mcusercontent.com/865a5bbea1086c57a41cc876d/files/ad60807b-a923-4a7e-ac84-559c4a5212a8/EDF_HR_Report_final_tagged_interactive_v2_accessible.pdf

lives. This will need to be taken into account in the design of the Child Guarantee. Member States need to be supported in making sure adequate support is given to housing children with disabilities and their families in line with human rights conventions such as the United Nations Convention on the Rights of Persons with Disabilities, and that children with disabilities are not in institutional care”.

In addition, the EDF’s statement also mentions that: “The Child Guarantee’s focus on early childhood education also needs to pay particular attention to ensuring that children with disabilities are not left behind. The recommendations and financial resources to emerge from the Child Guarantee must go towards making sure mainstream education is inclusive and accessible for children with disabilities, including digital learning. Emphasis should not only go towards increasing the accessibility of the physical settings and digital tools used to teach, but also towards training teachers and classroom assistants in fully including children with disabilities in the mainstream classroom setting”.

The joint contribution of ENIL¹³³, Validity Foundation and DRI¹³⁴ to the EC consultation on the Child Guarantee stressed the need to ensure access of all children with disabilities to inclusive education. Like all children, they need quality and inclusive education to develop their skills and realize their full potential. Nearly 50 percent of children with disabilities are not in school, compared to only 13 percent of their peers without disabilities¹³⁵. “Education of all students must take place in an inclusive environment, implying the obligation to move away from segregated or parallel forms of education or training for children with disabilities. Inclusive education must, therefore, be understood as a process that transforms culture, public policy and practice to create inclusive learning environments for all children, and which is responsive to the diverse needs of individual students, including students with disabilities”. Their joint statement includes several actions to be included as binding guidance in the Child Guarantee, among which:

1. Member States must ensure that the entire education system is inclusive at all levels (including pre-schools, primary, secondary and tertiary

education, vocational training and lifelong learning, extracurricular and social activities) and accessible to everyone (including buildings, information and communication, curriculum, education materials, teaching methods, assessment and language and support services).

2. Member States must ensure access to quality early childhood development, care and pre-primary education, together with the provision of support and training to parents and caregivers of young children with disabilities. If identified and supported early, young children with disabilities are more likely to transition smoothly into pre-primary and primary inclusive education settings. Member States must ensure coordination between all relevant ministries, authorities and bodies as well as OPDs and other NGO partners.
3. Quality inclusive education must provide persons with disabilities with preparation for work life for participation in the open labor market. To ensure smooth transition from childhood to adulthood for children with disabilities, there should be coordination in the implementation of the Child Guarantee with the Youth Guarantee.

Another important issue raised by ENIL, Validity Foundation and DRI regards the access of children with disabilities and their families to personal assistance, a key instrument for independent living which ensures that children are supported to grow up in a family and prevents institutionalisation. In addition to personal assistance, families should also have access to technical aids and equipment such as wheelchairs, hearing aids, communication aids. To this end, the Child Guarantee can encourage Member States to use the European Social Fund (ESF+) to pilot, or expand personal assistance for children with disabilities and their families. ERDF could be used to improve access of children with disabilities to technical aids and equipment, as well as for housing adaptations to make family apartments and houses fully accessible, and to prevent children from being placed in institutions because of inaccessible homes.

All the stakeholders that participated in the Focus Groups/interviews agreed that services should be inclusive, affordable and of high quality.

A broad definition of services that includes services plus real access is necessary. *“It is important to have access to the service and to the accompanying tools. For example, a child might have access to school but if he/she does not have a computer or computers in the school are outdated; or if he/she arrives at school without breakfast, then this is a problem...”. “If a service is free but it has associated costs (e.g., there is free education but with hidden costs- excursions, school material, lunch – this has to be taken into account”.*

Access to services is currently being jeopardized due to the COVID-19 pandemic which has left many families without their income, thus, posing a barrier to accessibility.

Assessment of the actual needs of the children in need and their families as well as flexibility in service provision is fundamental. *“...Availability of mobile services, less administrative burden on submission of written/paper requests, possibility to work on a child’s case on the phone/e-mail entirely, regular visits by social workers and professionals who work on a child’s case, clear description and clear follow-up of the situation of the child and his/her family”.*

Some countries have problems with the integration of services. This poses a major problem to vulnerable children, especially to children from marginalized/very poor communities who need integrated care and services (education, health, social services) that fall under the responsibility of different entities (at national, regional or local level). Integration of services needs to work smoothly to be beneficial, and this is not happening in some countries, which are characterised by lack of coordination and communication. *“The management of integrated services is crucial. (...) In Romania the appointment of a case manager did not work due to the lack of professional social workers”.*

Also for children with disabilities, integration of services through a holistic approach is fundamental. *“The creation of a short of “info-pack” with all the services available to children with disabilities and their families would be very useful, especially for low-income families who have difficulties in dealing with bureaucracy and going from one department to another”.*

In some countries, there is a lack of awareness of the services available which limits their accessibility.

“Services have to be publicized/disseminated, made visible; otherwise, people will not be able to access them”.

“[In Romania] it is difficult for parents to have access to services and benefits/allowances since they do not know how to obtain them and from what institutions”.

“[In Greece] there is no official mapping of the services provided by NGO’s related to early intervention. So, parents have limited knowledge and therefore cannot access them. Mapping all the services available is thus very important when talking about enablers.”

Also, to facilitate access to services, it is necessary to work directly with the family, raising awareness while taking into account the cultural differences that may exist. *“Make the parents aware of the importance of education (e.g., for girls) of healthy habits, etc. “Teaching parents” to enable children to have access to services because in some cases the barrier is the family”.*

In some countries accessibility of services is a problem, especially in rural areas. *“[In Bulgaria] in rural areas few services exist for children in need and they are not provided even to a small number of children who need*

133 European Network of Independent Living

134 Disability Rights International

135 UNICEF, available at: <https://www.unicef.org/education/inclusiveeducation#:~:text=Inclusive%20education%20means%20all%20children,speakers%20of%20minority%20languages%20too>

them”.

In Sweden, the social system for children with disabilities is very well developed and most of the services are publicly procured and provided (and paid for) by the government [children with disabilities are provided with free assistive technology and personal assistance, free taxi, interpretation and orientation support when needed] and each region has its own rehabilitation and assistive technology center [... the providers of assistive technology also provide training and reasonable accommodation]. However, although basic services and assistance are always provided for, “disabled children in smaller cities or remote areas may have less opportunities when it comes to some services, for example organised leisure and sports”.

Since Member States have different needs, flexibility is needed. “Design flexible services for target groups but with clear quality standards (...). It is very important to personalise the services (tailor made) while ensuring quality standards and quality outcomes (since in some cases “flexible” might mean “not good enough”). In addition, service areas need to be developed in a way that guarantees/facilitates parents’ access to the labour market. “For example, services in the area of ECEC should be developed in a way that is useful for parents (e.g., open all day)”.

Universal design, which is mentioned in the UNCRPD art. 4, was proposed as a way to eliminate stigma, increase awareness and create an inclusive culture. “Universal design can help secure the path for children with disabilities into a self-determined life”.

Stakeholders agreed that a comprehensive approach based on the EC 2013 Recommendation is necessary.

“A holistic approach can be guaranteed by national multiannual strategies (based on the EC 2013 Recommendation) and by national child guarantee implementation plans (focused on services). The Child Guarantee needs strong political commitment (council recommendation) based on an integrated approach sustained on the 2013 Recommendation. The momentum is now.”

“Also the national plans, based on multi-annual strategies to tackle child poverty need to be based on the 2013 Recommendation”.

And the holistic approach has to include not only the child but also the family.

“Families need a lot of flexible support. Many parents need support, and this has to be taken into account. We need a holistic approach to include the whole family”.

“The Child Guarantee (through the Council Recommendation) only focuses on services, which are of course important, but parents are critical and they need to be empowered and reinforced. Thus, the 3 pillars of the EC Recommendation of 2013 have to be followed”.

In the case of children with disabilities:

“Children with disabilities are the least listened to and the least seen. They have more problems with nutrition, access to health, education, and inaccessible housing is a problem. Moreover, the abuse of these children, de facto, is a concrete phenomenon widely underestimated”.

“Special attention should also be provided to

children with disabilities that live in institutions or in foster families”.

The importance of assessing the child development early on time through appropriate screening instruments is crucial. Especially in the case of children with disabilities, early detection of problems can make a difference.

“ECEC is fundamental (...) autism at 2 years is one thing, at 15-16 is something different. The younger the child when the problem is detected, the better. Screening is very important to look for children that need special support”.

In some countries (e.g., Bulgaria) a screening instrument at national level is missing. Organizations use different screening instruments that are not “validated” at national level. “The Child Guarantee should validate this type of instrument. It should ensure the adoption of a screening instrument to assess the child’s development

5.3 Key area no.3 Governance and Resources

Despite the strong political commitment and support received, the revision of the evaluations carried out on the Youth Guarantee revealed that a full implementation of the Youth Guarantee in member states did not occur. Consulted sources showed that full implementation is still pending in several Member States, while many of them revealed not to be well-prepared to implement it successfully.

Although the Youth Guarantee has been recognised to be a facilitator of structural reforms (Active Labour Market Policies such as the ones implemented under the Youth Guarantee required structural reforms in basic services - VET, education, public employment services), however, the extent of the reforms have widely differed among member states.

Important issues that arose during the implementation

of the Youth Guarantee were: (i) the need for an adequate capacity of the public employment services (PES) and (ii) the need for enhanced internal coordination and strengthened capacities and collaboration among

in the first years”.

Regarding ECEC and education, the lack of qualifications of the professional staff in these sectors is also a barrier to access services for children with disabilities. In some member states the staff does not have the skills to work with children with disabilities; they are not trained to create inclusive environments and to interact/cater for the need of children with special needs.

Access to personal assistants is very important for children with disabilities. “Children with disabilities need support to live independently, so access to personal assistants should be taken into account in the service area. It is necessary to make sure that parents can buy the assistant with their budgets. However, in some cases, personal assistants are not qualified, well trained staff/professionals”.

stakeholders (schools, training institutions, public employment services, employers, etc.).

In terms of resources, the Youth Guarantee was considered as a costly measure since it required substantial investments -both in terms of human and financial resources- to carry out the structural reforms needed. The EU provided financial support to finance the process¹³⁶ to be topped up by the Member States’ financial resources. The evaluations stated that since no robust estimates of the global costs were available before proposing the Youth Guarantee scheme, the total funding might have not been adequate. Moreover, since national funding sources were also essential for the long-term sustainability of measures, the budget restrictions in countries/regions with large NEET populations, might have been the cause that expectations of the European Youth Guarantee could

not be met.

Thus, the takeaway from the experience of the Youth Guarantee is the importance of being a political priority

136 The Youth Guarantee was funded by a budget of €6 billion provided in the “Youth Employment Initiative for 2014-2020”. The YEI allocation must be topped up by the Member States’ financial resources.

to ensure commitment, have an adequate governance and also an appropriate allocation of resources (both human as well as financial (EU and national funding)).

The findings from the Feasibility Study on the Child Guarantee state that in order to be effective and successful, the fight against child poverty and exclusion must be a political priority. The 2013 Investing in Children Recommendation lacked support and implementation at national level. The Child Guarantee, under the form of a Council Recommendation, is a more powerful policy instrument to ensure stronger commitment at member state level¹³⁷.

Governance must ensure the development of integrated, comprehensive and strategic action plans/frameworks. This means developing national (and where appropriate regional/local) plans/strategies that emphasise a multidimensional, holistic approach – with a strong focus on coordination and cooperation between services and effective outreach to children in vulnerable situations. Such plans should be coordinated at the highest level (e.g., prime minister of national/regional government) in order to give them high visibility and effective coordination. It is therefore necessary to improve coordination at all levels of governance between national, regional and local child policies. Since the needs of children in vulnerable situations and their families are often complex, multiple, and cut across different policy areas, the issue of coordination becomes of paramount importance. However, too often the delivery of policies is in policy ‘silos’, and there is a lack of coordination and cooperation between policy providers to ensure that their policies are mutually reinforcing and delivered in an integrated way at local level.

As far as funding is concerned, the Feasibility

Study on the Child Guarantee found evidence that investment in the 2014-2020 EU funding period was not directed sufficiently at ensuring children’s access to key social services and implementing the 2013 EU Recommendation in spite of the fact that the Recommendation specifically identified a role for EU funds in its implementation.

In order to ensure an appropriate allocation of funds for the Child Guarantee, the Feasibility Study suggests making support for children in vulnerable situations a specific priority for the 2021- 2027 funding period and to better mobilise all EU funds and financial instruments (i.e., the ESF+, the ERDF, AMF, EIB, InvestEU, Structural Reform Support Programme (SRSP) and Erasmus+), combining them to support different aspects (e.g., combine ERDF and ESF+ funding to establish early-care centres and provide services to the children). With respect to ESF+, the Study also suggests earmarking a specific minimum percentage of ESF+ funding to be used for supporting children in vulnerable situations. This issue as well as the need for good governance and cooperation have also emerged from the EC consultation to stakeholders.

Participants to the Focus Groups/interviews mentioned the lack of financial resources as a barrier to the creation of services to vulnerable children. *“Financial support is necessary to ensure affordable and inclusive childcare and long-term facilities to meet the needs of children in need, in particular those of children with disabilities”*.

The lack of financial resources is especially felt in Eastern European countries (Bulgaria and Romania) where national legislations exist but are difficult to implement due to the scarcity of funding allocated¹³⁸. At the same time, these countries usually fail to implement European and International conventions like the 2013

EC Recommendation on Investing on Children and the UNCRPD.

Sweden has made the UN convention on the Rights of the Child into national law and Swedish policies around disabled children are quite ambitious and all tax paid however, during the last five years, the resources have been decreasing.

“...It is a fact that services and resources for disabled persons are diminishing, and requirements for individuals that apply for support are sharpened, forcing more applicants to go through the legal system, which in turn risks excluding socially and economically less well-off individuals”.

The Child Guarantee is an instrument to trigger national investments. National budgets can be complemented with resources from the EU therefore *“more information on the available EU funding and how to access it is needed”*. Experts agreed on the need to mobilise other than national investments, also EU funds in order to prevent and tackle child poverty. The proposal to earmark 5% of the ESF+ resources to child poverty in every EU Member State has not yet been approved by the Council and negotiations are still going on. In addition, other EU funds like ESF, ERDF, InvestEU, Erasmus+, Recovery and Resilience Facility, and Next Generation EU need to be used more strategically to implement the Child Guarantee.

Also ensuring sustainability over time has been considered crucial: *“Funding must be sustainable over time, not only one year”*. *“Sustainable funding, over the years regardless of the government in power”*.

According to some experts, funding and support to Civil Society Organizations (CSOs) that run projects aligned with national strategies to reduce child poverty in line with the Child Guarantee should also be provided.

“Service provision is an integral part of the implementation of the Child Guarantee, so CSOs should be financed to run projects to successfully implement the Child Guarantee”.

“Some CSOs in some member states do not access

EU funds. In some countries CSOs have lower co-financing rates. They are usually small organizations that do not have the resources to participate in EU-funded projects. They need support, training, capacity building to be able to use these funds”.

“NGOs directly working with children are usually small organizations that lack the capacity to access to EU funding”.

“Support to CSOs in accessing EU funds to run projects that are going to fit within the implementation of the Child Guarantee is necessary”.

Good governance and cooperation among ministries related to child protection and avoiding working in “silos” were also mentioned and considered very important issues by participants in the focus groups.

“Governance is poor in general and project oriented. Thus, sustainability is not ensured and lots of persons in need remain without support and service”.

“Exchange of good practices, collaboration between public ministries, not segmented policies are very important”.

“Good governance is fundamental, but it needs to be linked with real life, what’s on the ground. For example, medical experts may give recommendations, but they do not know what is going on in practice. A link with real life is necessary. No theoretical recommendations”.

The need to ensure that the allocation of funds or the projects planned respond to actual/real needs and do not overlap with other national projects was also mentioned by participants. *“There must be a total alignment with national strategies- monitoring is fundamental to ensure this strategic alignment”*.

The need to raise the number, qualifications and remuneration of the staff working with children (not only social workers, but also teachers, psychologists, speech/hearing/physio therapists etc.) was mentioned together for the need for clear guidance and protocols

¹³⁷ Experience over the years has shown that in key areas of social policy and social rights the EU’s impact is greatest when its legal, policy coordination/guidance and funding instruments are underpinned by strong political commitment and leadership by the Council of the EU (and possibly the European Council), the European Commission and the European Parliament. Political support is evident from the clear political demand by the European Parliament for the establishment of a Child Guarantee and in the clear statement in favour of a Child Guarantee in the European Commission President’s political priorities: *“To support every child in need, I will create the European Child Guarantee, picking up on the idea proposed by the European Parliament. This tool will help ensure that every child in Europe at risk of poverty or social exclusion has access to the most basic of rights like healthcare and education.”* Source: Feasibility Study on the Child Guarantee Final Report.

¹³⁸ A national strategy for children exists both in Romania and in Bulgaria, however, they need to be more transparent and better communicated to the public to make them aware of the problem of child poverty.

in their work, whilst ensuring collaboration and coordination among them.

In addition:

“The “best interest” of the child” under article 3 of CRC and art. 7 of CRPD must be the guideline of all policies of the Child Guarantee”. “Best interest” means first of all that knowing or assuming to know what is best for the child under a given circumstance is not enough to quantify it in

terms of interests. This interest is higher than any opposing interests; that is, in case of conflict with opposing interests (usually, adults’ interests), the child’s interests should prevail. Whenever there is some opposition in recognizing a child’s right it is because adults have opposing interests”.

“All actions foreseen in the Child Guarantee should be viewed on how they are going to be applicable and beneficial for children with disabilities”.

5.4 Key area no.4 Collaborative approach and synergies

Collaboration and partnering with key stakeholders are needed to gain political support, develop adequate policies and ensure monitoring. Reports on the European Youth Guarantee mentioned that coordination, collaboration and broad support among stakeholders including governments, social partners and the civil society in the design and implementation

of the measures was fundamental to ensure their adoption¹³⁹. However, the implementation of the Youth Guarantee at national level was not an easy task as it often required the creation or reform of vocational training schemes, education systems and public employment services. Moreover, the success of these programs is based on their ability to create cooperative

agreements with employers’ organizations, trade unions, schools, training centres and NGOs, which can be difficult and time consuming. Cooperation among partners is key to reach out to different types of NEETs, in particular those not registered at the public employment services and to design policies that are tailored to the needs of different target groups of young people. Lack or deficient collaboration among stakeholders has also detrimental consequences on the quality of the offers (see also key area no.2) since the quality of the offers highly depends on the capacity of public employment services to engage with employers and work closely with schools, which varied widely across member states. Although it seems that social partners appeared to have been involved in all countries at some point or another in the design, implementation and evaluation of the youth guarantee schemes at national level, however, some studies are more critical regarding the involvement of social partners (trade unions and employers’ representatives). In particular, according to ETUC (2016) “the involvement of trade unions has been very often partial and sporadic over the three stages of design, implementation and evaluation”. According to the SWD (2016)¹⁴⁰, cooperation remains a challenge and the involvement of youth organizations should have been strengthened.

The learning from the Youth Guarantee is thus the need to have in place efficient coordination and collaboration mechanisms among key stakeholders (including governments, social partners and the civil society) to ensure the proper implementation of the measures and services. In addition to cooperation and collaboration among stakeholders, the alignment of the Youth Guarantee with other European initiatives (e.g., European Pillar of Social Rights; Skills Agenda; European minimum wage initiative; European Green Deal) was also a key issue to be taken into account.

The Feasibility Study on the Child Guarantee highlighted the need to ensure coordination and cooperation at all levels, if policies/measures to combat child poverty and exclusion and guarantee access to key services are going to succeed e.g.:

at EU level, by involving several DGs (Education, Employment, Health, Eurostat...)

at policy/national level, by involving the different ministries and related policies and creating a comprehensive approach (welfare, health, education, social policies, labor market, employment, fiscal policies...)

at regional/local level, by involving key stakeholders (children, parents, professional actors in childcare and education, CSOs, service providers...)

The Feasibility Study on the Child Guarantee mentioned the lack of child and parental involvement as one of the key barriers to developing effective policies and programs for children in vulnerable situations that can hinder their access to key services. “When parents and children in vulnerable situations are not consulted and do not have their views and experiences taken into account in the development and implementation of policies there is a risk that those policies are implemented in ways that do not reflect their needs and experiences; this can lead to unintended barriers to their accessing the key social rights” (FSCG Final Report).

Thus, it is necessary to put in place effective mechanisms and procedures to ensure that children and their parents are consulted in the development, delivery and monitoring of policies/services. Their views are important in identifying blocks to access and participation and suggesting improvements. In addition, the Study also mentioned the importance of resourcing civil society and their key role in raising awareness, identifying needs, developing services and monitoring the implementation of policies. “Civil society and children’s rights organizations working with children in vulnerable situations play a key role in many countries. They raise awareness of children’s rights, highlight the needs of children, develop initiatives and services on the ground, contribute to monitoring the delivery of policies, and highlight gaps and weaknesses in existing services. However, to play these roles to the full their role needs to be recognized, encouraged and resourced”(FSCG Final Report).

In the case of children with disabilities, the voice of children, parents, family associations, organizations focused on disability and service providers are fundamental and should be heard in all decision-making processes that affect

139 The European Youth Guarantee: A systematic review of its implementation across countries.

140 SWD (2016) 323 final: The Youth Guarantee and Youth Employment Initiative three years on



their lives at local, national and EU level.

The Child Guarantee strategies and action plans have to be aligned with the UNCRC as well as with the UNCRPD, which have been ratified by the EU. As in the Youth Guarantee, also for the Child Guarantee it will be important to create synergies with other European initiatives, like the European Semester, the Minimum Income Framework, the EPSR, the EU Disability Strategy post 2020 etc. In this case, a special synergy must be established between the Child Guarantee and the Youth Guarantee to ensure policy coherence and that the two schemes will support and complement each other. This would be critical to guarantee support to vulnerable children until they become resilient autonomous adults.

The EC consultation to stakeholders also confirmed the need to actively involve children and parents in the design, implementation and monitoring of policies/measures aimed at fighting child poverty and exclusion. Guaranteeing the right of children to participate in decisions that concern them must be equally applied in the case of children with disabilities. The parents' role is key for the wellbeing of their children. The wellbeing of the children depends largely on the support to the parents. Thus, parents and family associations should be consulted at all stages of the Child Guarantee development (not only ad hoc consultation during the conception phase of the Child Guarantee but also consultation on the design, implementation and assessment phases should be foreseen in the multi-annual national strategies and action plans). Likewise, also CSOs - including service providers - should be the heart of the implementation of the Child Guarantee, being included and consulted in the design implementation and monitoring both at EU and national levels. Linking the Youth Guarantee with the Child Guarantee could build important synergies as education is a key part in both schemes. In relation to early drop-out, linking the Child and the Youth Guarantee could be useful to further identify and reach young people in need of support – and to address more effectively the issue of NEET identified as one of its major shortcomings (see also key area no.1). Synergies with the Child Guarantee could also improve the transition between education and work.

Experts consulted in the Focus Groups and Interviews viewed collaboration as a fundamental issue for the success of the Child Guarantee at national level, although in practical terms it is not clear which institution should take the responsibility for coordination.

“Currently there is a lack of collaboration between different authorities and responsibilities. This should be supported from grassroot level to up”.

“A national institution could be appointed for cooperation among the health, social and education systems”.

“It is necessary to create a collaborative approach at national and local level; a model with practical steps at national level”.

“[In Bulgaria] Legislation and practice show that different ministries, agencies and their regional and local departments do not work in a coordinated manner. This is due to the lack of legal obligations to do so, lack of e-government and poor administrative service.”

Collaboration is especially important when dealing with the needs of children with disabilities and also when dealing with “transitions”:

“Any collaborative approach and synergies must take into account the intersectional discrimination and specific issues faced by children with disabilities. This intersectionality suffered by those children oblige the different stakeholders (EU and National) to study and training on it”.

“Collaboration is also very important when dealing with “transitions” (school – employment; ECEC- school or family- ECEC). Interconnectivity and networking are fundamental for transitions as there are overlapping fields”.

Experts also confirmed the importance that CSOs, children, families, service providers participate in the drafting, implementation and monitoring of the national strategies and action plans of the Child Guarantee and member

states should put in place the adequate instruments (e.g. structured dialogues) to do so.

“[In Sweden] there are a number of relevant agencies and also NGOs that should be involved to maximise impact. Anchoring processes usually have a broad and democratic coverage on paper, but in reality, it's the key organisations (and sometimes people) that count. When it comes to children, a combination of educational

institutions, civil society, childcare and the policy part stipulating parental leave etc would be the most important ones to cover”.

Last but not least, experts also mentioned that the implementation of the Child Guarantee should be underpinned by other initiatives of the European Commission, such as the European Pillar of Social Rights, the European Semester, and the EU comprehensive strategy on the rights of the child.

5.5 Key area no.5 Monitoring

Evaluations of the Youth Guarantee scheme suggested that the Commission should put in place a comprehensive monitoring system for the Youth Guarantee, covering both structural reforms and measures targeting individuals and tackle the ongoing lack of reliable data and indicators¹⁴¹. Efforts to monitor the Youth Guarantee's implementation would contribute to underpinning national commitments to the Youth Guarantee¹⁴².

An outcome of concern that emerged from the Feasibility Study on the Child Guarantee is that Member States so far have not always been able to properly implement and monitor existing child-related provisions. To ensure that the Child Guarantee is successful, proper implementation and monitoring are key. Thus, the Study calls for an effective monitoring system as an integral part of the Child Guarantee instrument. It is necessary to regularly to monitor policies/ services once they are in place to ensure that they are efficiently and effectively delivered, they are of a high quality and are effective in ensuring access to them by children in vulnerable situations. Thus, transparent systems need to be put in place for regularly inspecting services and also to develop effective complaints procedures when parents and children have problems with accessibility or with the quality of services.

The Study also puts forward the following suggestions to enhance monitoring by Member States (supported by the EU): (i) make full use of existing statistics and administrative data and reinforce statistical capacity (including by disaggregating data by different

vulnerable groups) where needed and feasible, to monitor the impact of policies on children and their families; (ii) organise systematic ex ante assessments of the potential impact of future policies on children – particularly those belonging to vulnerable groups (e.g. children with disabilities); (iii) build on the added value of comparability and the exchange of good practice and lessons learned; and (iv) include those who are most affected by the system in monitoring mechanisms (i.e. children, disabled person organisations and civil society).

Comments from stakeholders in the EC consultation are in line with the findings and recommendations of Feasibility Study regarding the need that the Child Guarantee initiative is accompanied by a robust monitoring framework and by a mechanism that will secure children's and young people's meaningful involvement in monitoring and evaluation. Also, parents and CSOs should be actively included and consulted in the monitoring of the Child Guarantee, both at European and at national level.

Participants to the Focus Groups and interviews considered monitoring an essential element for the success of the Child Guarantee. The need for periodic, independent evaluation with good indicators and counting with the participation of children and CSOs was shared by experts.

“It is fundamental to decide how you are going to monitor and this has to be decided ex-ante”.

141 EU Court of Auditors 2015 and OECD 2015

142 EC 2016 SWD_YG 3 years on

“In Sweden, there is an Ombudsman for Children who would be the obvious monitoring body for a Child Guarantee. There is also a National Anti-Discrimination Agency that has monitoring capabilities”.

“Every measure should be followed up and assessed”.

“Stakeholders engagement, especially for what concerns the representatives of the most marginalised groups must be ensured”.

“Consultation with children with disabilities and their representative organizations should be mandatory. The involvement of children with disabilities must be taken into account very seriously. It is not only an obligation coming from CRPD art. 7.3 (the rights to express their view but also the right to be heard) but it is also a positive action against discrimination against children with disabilities”. It is correct to consult CSOs but DPOs (Disable People Organizations) should have the priority in consultation”.

Whilst in Nordic countries (e.g., Sweden) most policies are monitored and results are transparent, in some Eastern European and Mediterranean countries, an evaluation culture is missing, and monitoring and evaluation are not carried out in a systematic way:

“[In Romania], most projects lack proper evaluation. CSOs have been doing the independent monitoring of programmes but it is needed to set up objectives and clear indicators, statistics, especially on disability. At the moment, each party keeps a portion of the statistics, there are many pieces, like a puzzle, that need to be put together”.
“Independent monitoring and evaluation when national programmes and strategies will be implemented is needed. Independent monitoring could be encouraged through financing lines set aside for CSOs”.

“[In Bulgaria] Monitoring and field research are generally not welcome and are not allowed by the state authorities”.

“[In Greece] there is a lack of monitoring systems for provision of services, no quality indicators and no appropriate certified training for early intervention and home visiting programs. Follow up and assessment of the services provided should be explicitly designed and form an indispensable part of each program”.

“Evaluation and monitoring cannot be something optional, they must be compulsory exercises with well-defined impact criteria and indicators. Moreover, there should be common child-specific indicators to ensure that all projects are aligned and contribute to the achievement of a broader specific objective defined at national level”.

In addition, experts mentioned that *“monitoring and good quality will be ensured if all key stakeholders are involved from the very beginning”* and *“The Child Guarantee could launch a validated instrument to be adapted at local level to the services and to the target groups on how to monitor them and also on how to follow the quality”.*

In addition, results from the monitoring exercise should feed other initiatives: *“The EC should put together a comprehensive monitoring framework where every year priorities and how targets are met are monitored, and the results have to feed other policies/initiatives like the EU Semester, EPSR, etc.”*

Finally, the issue of the need of new indicators other than AROPE (At Risk Of Poverty or social Exclusion indicator) was mentioned by participants to the Focus Groups and interviews to ensure a comprehensive understanding of child poverty and social exclusion.

“We need a robust system at national level and new key indicators, for example on early childhood development

and de-institutionalisation. The AROPE indicator must be complemented with other indicators”.

6. Summary and Conclusions

This section summarizes the results and presents the main conclusions of the report under the form of “key takeaways” with the objective to contribute to the shaping of a successful and impactful Child Guarantee.

The key lessons or key takeaways that can be extracted from the study are following:

Clearly identify and obtain data from the target groups.

The first lesson learnt from the Youth Guarantee is that a clear picture of the target group in terms of size, characteristics, composition, needs as well as good quality, homogeneous, comparable, disaggregated data are needed if supporting schemes are to be successful and impactful.

Clarity regarding issues of size and definition of the target groups should be the first step of any intervention on children. To date, there is no clear picture of the situation of vulnerable children in the Member States due to the lack of quality, reliability, coverage, and limitations of the information/data available and, as a consequence, the total size of the population to be covered remains largely unknown. Thus, lack of clear targets and of child-specific data and indicators are major weaknesses that threaten the Child Guarantee and any intervention on children.

Whether the focus will be in all children, in the four groups of vulnerable children identified (i.e., children in institutions, children with disabilities, children with migrant background including refugees and children living in precarious family situations) or in the groups chosen by the Member States according to their specific priorities, quality data and child-specific indicators are needed for a Child Guarantee scheme.

For children with disabilities, it is crucial to overcome the current severe lack of data both at EU and national level. Data on children with disabilities must be disaggregated by gender, age, kind of impairment,

living in institution, at home, foster care. Moreover, a clear definition of disability is also needed.

Ensure access to high-quality, inclusive, affordable and integrated services.

To avoid stigma and segregation of vulnerable children, services must be truly inclusive and of high quality. The issue of high-quality was a recurring theme in the Youth Guarantee. The low quality of the offers/services, the lack of a clear definition of what constitutes a good quality offer, and the absence of agreed quality standards may have hampered the effectiveness of the Youth Guarantee.

Access by children to key fundamental services (education, including early childhood education and care, health, housing and nutrition) should be guaranteed through a twin-track approach consisting of universal mainstream services for all children and additional support services for the most vulnerable. Efforts have to be made to ensure that universal services for all children are developed in an inclusive way. Good-quality universal public services play a key role in ensuring all children have access to safety, opportunity and participation. In addition, vulnerable children may need specific additional or complementary services to meet their specific needs. Such specific services should not be seen as an alternative to accessing mainstream provision but as complementary and enabling.

To ensure high quality services, it is necessary to set up clear standards or criteria. The EU could contribute to develop EU-wide quality frameworks (like the European Quality Framework developed in the area of ECEC) and set common service standards, in order to guarantee high quality services in the five areas¹⁴³ and the Child Guarantee could promote the national application of these quality frameworks.

In some cases, access to services may be hampered by lack of awareness regarding the availability of the services. Also, in rural areas, the availability and accessibility of services is limited. Finally, although a

service can be free, accessing it may involve additional costs which can act as barriers for children in vulnerable situations. It is therefore necessary to consider all the costs of accessing a service, and Member States should have policies to ensure that such costs do not act as an access barrier.

For children with disabilities, the integration of services is of paramount importance as they need integrated care and services involving different areas (e.g., education, health, social services) that fall under the responsibility of different entities. Ensuring integration of services through a holistic and coordinated approach is thus fundamental.

Not only access to services but also access to resources must be guaranteed.

Although ensuring access to services is key, ensuring that children and their families have access to resources and adequate income is likewise fundamental since income is often a prerequisite to enabling access to services.

The Child Guarantee must also contemplate measures for the families since child poverty is mainly a matter of family poverty and supporting children cannot be separated from supporting their families. Not considering the family situation will only result in short-term improvements but not in the end of poverty or social exclusion for the child¹⁴⁴.

Thus, Member States and the European Commission must set the implementation of the Child Guarantee in the wider context of tackling child poverty and social exclusion based on the comprehensive three-pillar approach advocated in the 2013 Recommendation on Investing in Children¹⁴⁵. The Child Guarantee and the 2013 Recommendation must be closely linked.

Wider support must be ensured.

Other than free access to key services (health, education, ECEC, nutrition, housing and leisure activities) there are also other support areas that need to be tackled by the

Child Guarantee:

Digital literacy: investing in programs that empower and protect children in the digital era. The Child Guarantee should encourage investment in digital literacy and comprehensive education (internet safety) to empower all children to navigate the digital world and make use of its opportunities without harm. Enabling them to access and to be capable to use these tools will contribute to better results in all policy areas of the Child Guarantee.

Effective prevention and early intervention measures: to reduce inequalities at a young age and increase physical and mental health as well as cognitive and social skills, ensuring that children are better equipped to enter into adulthood.

Transition measures: to ensure a smooth passage from childhood to youthhood. The Child Guarantee should promote these measures in close coordination with the Youth Guarantee. There must be policy coherence between the Youth and the Child Guarantees and they must support and complement each other.

Mental health: increase efforts to focus on the mental health (psychological well-being) of vulnerable children.

Children with disabilities usually have more problems with access to services than other vulnerable children.

The recommendations and financial resources to emerge from the Child Guarantee must go towards making sure mainstream education is inclusive and accessible for children with disabilities, including **digital learning**. Emphasis should not only go towards increasing the accessibility of the physical settings and digital tools used to teach, but also towards training teachers and classroom assistants in fully including learners with disabilities in the mainstream classroom setting. Quality inclusive education must provide persons with disabilities with preparation for work life for participation in the open labor market. To ensure

¹⁴³ The 2019 Council Recommendation on high-quality ECEC systems, which includes a European Quality Framework, is an example that could be followed in other areas.

¹⁴⁴ Parents' participation in the labor market in decent jobs, fair minimum wages, access to adequate unemployment benefit and minimum income, as well as non-stigmatizing in-kind support and tailored benefits are crucial components of preventing and tackling child poverty and social exclusion. This is particularly crucial in the context of COVID-19 which is generating increased child and family poverty and social exclusion due to reduced working, rising unemployment, low levels of income support and rising prices. <http://www.alliance4investinginchildren.eu/joint-statement-on-protecting-children-and-their-families-during-and-after-the-covid19-crisis/>

¹⁴⁵ 1. access to adequate resources, 2. access to affordable good-quality services and 3. children's right to participate in decision making.

smooth transition from childhood to adulthood for children with disabilities, there should be coordination in the implementation of the Child Guarantee with the Youth Guarantee.

The Child Guarantee's focus on ECEC needs to pay particular attention to ensuring that children with disabilities are not left behind. The importance of assessing the child's development early on time through appropriate screening instruments is crucial. Especially in the case of children with disabilities, early detection of problems can make a difference. Member States must ensure access to quality early childhood development, care and pre-primary education, together with the provision of support and training to parents and caregivers of young children with disabilities. If identified and supported early, young children with disabilities are more likely to transition smoothly into pre-primary and primary inclusive education settings.

For children with disabilities (and their families), access to personal assistance is fundamental. Personal assistance is a key instrument for independent living which ensures that children are supported to grow up in a family and prevents institutionalization. In addition to personal assistance, families should also have access to technical aids and equipment such as wheelchairs, hearing aids, communication aids. To this end, the Child Guarantee can encourage Member States to use the European Social Fund (ESF+) to pilot or expand personal assistance for children with disabilities and their families. ERDF could be used to improve access of children with disabilities to technical aids and equipment, as well as for housing adaptations to make family apartments and houses fully accessible, and to prevent children from being placed in institutions because of inaccessible homes (see also the takeaway: "Make better use of EU funding opportunities").

Ensure decent salary, fair working conditions and continuous professional staff development.

This should be guaranteed for all the staff working with children in vulnerable situations and in mainstream settings.

In the case of children with disabilities, the professionalism of the staff becomes even more important. In some member states the staff does not have the skills to work with children with disabilities; they are not trained to create inclusive environments or to interact/cater for the need of children with special needs. The lack of qualifications of the professional staff

in the ECEC and education sectors is also a barrier to access services for children with disabilities.

Adequate governance structures and funding allocation

One of the lessons learnt from the experience of the Youth Guarantee was the importance of having an adequate governance and appropriate resources, combining both EU and national funding. To be effective and successful, the fight against child poverty and exclusion must be a political priority. The Child Guarantee, under the form of a Council Recommendation, is a more powerful policy instrument to ensure stronger commitment at member state level than the 2013 EC Recommendation Investing in Children, which lacked support and implementation at national level.

Governance must ensure the development of integrated, comprehensive and strategic action plans/frameworks. This means developing national (and where appropriate regional/local) plans/strategies that emphasize a multidimensional, holistic approach – with a strong focus on coordination and cooperation between services and effective outreach to children in vulnerable situations. Such plans should be coordinated at the highest level (e.g., prime minister of national/regional government) in order to give them high visibility and effective coordination. It is therefore necessary to improve coordination at all levels of governance between national, regional and local child policies. Since the needs of children in vulnerable situations and their families are often complex, multiple, and cut across different policy areas, the issue of coordination becomes of paramount importance. However, too often the delivery of policies is in policy 'silos', and there is a lack of coordination and cooperation between policy providers to ensure that their policies are mutually reinforcing and delivered in an integrated way at local level.

The allocation of funding must be adequate. The Child Guarantee is an instrument to trigger national investments. National budgets can be complemented with resources from the EU to combat child poverty and exclusion.

Make better use of EU funding opportunities.

Suggestions to ensure an appropriate allocation of funds for the Child Guarantee include making support for children in vulnerable situations a specific priority for the 2021- 2027 funding period and better mobilizing

all EU funds and financial instruments (i.e., the ESF+, the ERDF, AMF, EIB, InvestEU, Structural Reform Support Program (SRSP), the Recovery and Resilience Facility, Next Generation EU and Erasmus+), combining them to support different aspects (e.g., combine ERDF and ESF+ funding to establish early-care centres and provide services to the children). With respect to ESF+, earmarking a specific minimum percentage of ESF+ funding to be used for supporting children in vulnerable situations is being evaluated¹⁴⁶.

Funding and support to Civil Society Organizations (CSOs) that run projects aligned with national strategies to reduce child poverty in line with the Child Guarantee should also be provided.

When dealing with children with disabilities and EU funds, it would be important to include a mention of the UNCRPD in the enabling conditions and to avoid misuse of funds, insist on greater clarity and further provisions in the regulations governing EU funds so that accessibility, social inclusion, and deinstitutionalisation are prioritized when devising EU-funded measures for children with disabilities. Also make sure that funding is not used in ways that are inconsistent with obligations under the UNCRC and UNCRPD and set up an independent budget line to guarantee that structured dialogue across institutions, agencies, and bodies includes meaningful consultation with and the participation of children with disabilities.

Foster collaboration and partnering with key stakeholders.

Collaboration and partnerships with key stakeholders are crucial to gain political support, develop adequate policies and ensure monitoring. The experience from the Youth Guarantee highlighted the need to have in place efficient coordination and collaboration mechanisms among key stakeholders (including governments, social partners and the civil society) to ensure the proper implementation of the measures and services.

Therefore, for policies/measures to combat child poverty and exclusion to be successful, coordination and cooperation at all levels¹⁴⁷ must be ensured. In

addition, children, parents and CSOs - including service providers - should be consulted at all stages of the Child Guarantee development (not only ad hoc consultation during the conception phase of the Child Guarantee but also consultation on the design, implementation and monitoring phases should be foreseen in the multi-annual national strategies and action plans).

In the case of children with disabilities, the voices of children, parents, family associations, organizations focused on disability and service providers are fundamental and should be heard in all decision-making processes that affect their lives at local, national and EU level. The involvement of children with disabilities must be taken into account very seriously and consultation should be mandatory. It is not only an obligation coming from CRPD art. 7.3 (the rights to express their view but also the right to be heard) but it is also a positive action against children with disabilities' discrimination.

Make sure the Child Guarantee is aligned with other EU initiatives.

As in the Youth Guarantee, also for the Child Guarantee it will be important to create synergies with other European initiatives, like the European Semester, the Minimum Income Framework, the EPSR, the EU Disability Strategy post 2020, and of course with the (Reinforced) Youth Guarantee itself. The alignment between the two guarantees will ensure policy coherence and mutually reinforcing support. The Child Guarantee strategies and action plans also have to be aligned with the UNCRC as well as with the UNCRPD, which have been ratified by the EU.

For people with disabilities, linking the Child and the Youth Guarantee could be useful for example, in relation to education and early drop-out, to further identify and reach young people in need of support and also to improve the transition between education and work for young people with disabilities.

Put in place an efficient monitoring mechanism.

So far, Member States have not always been able

¹⁴⁶ The proposal to earmark 5% of the ESF+ resources to child poverty in every EU Member State has not yet been approved by the Council and negotiations are still going on.

¹⁴⁷ at EU level, by involving several DGs (Education, Employment, Health, Eurostat...); at policy/national level, by involving the different ministries and related policies and creating a comprehensive approach (welfare, health, education, social policies, labor market, employment, fiscal policies...); at regional/local level, by involving key stakeholders (children, parents, professional actors in childcare and education, CSOs, service providers...)

to properly implement and monitor existing child-related provisions. To ensure that the Child Guarantee is successful, proper implementation and monitoring are key. An effective monitoring system must be an integral part of the Child Guarantee instrument. It is necessary to regularly to monitor policies/ services once they are in place to ensure that they are efficiently and effectively delivered, they are of a high quality and are effective in ensuring access to them by children in vulnerable situations. Thus, transparent systems need to be put in place for regularly inspecting services and also to develop effective complaints procedures when parents and children have problems with accessibility or with the quality of services.

The Child Guarantee can support Member States to: (i) make full use of existing statistics and administrative data and reinforce/improve their statistical capacity (including disaggregated data by different vulnerable groups) to monitor the impact of policies on children and their families; (ii) organize systematic ex ante assessments of the potential impact of future policies on children – particularly those belonging to vulnerable groups (e.g. children with disabilities) ; (iii) build on the added value of comparability and the exchange of good practice and lessons learned; and (iv) include those who are most affected by the system in monitoring mechanisms (i.e. children, parents, CSOs, disabled person organizations, and civil society).

Monitoring must be a compulsory exercise with well-defined impact criteria and indicators. The EC could put together a comprehensive monitoring framework where every year priorities and how targets are met are monitored. There should be common child-specific indicators (other than AROPE - At Risk Of Poverty or social Exclusion indicator) to ensure that all actions to combat child poverty and exclusion are aligned. In addition, results from the monitoring exercise should also feed other initiatives like the EU Semester, the EPSR, etc.

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