Objective of the Public Feedback

In order to realise the full potential of the European Union and deliver on its strategic objectives, the Urban Agenda for the EU strives to involve Urban Authorities in achieving Better Regulation, Better Funding and Better Knowledge.

Established with the ‘Pact of Amsterdam’ of May 2016, the Urban Agenda for the EU is a new working method to ensure maximum utilisation of the growth potential of cities and to successfully tackle social challenges. It aims to promote cooperation between Member States, Cities, the European Commission and other stakeholders, in order to stimulate growth, liveability and innovation in the cities of Europe.

As stated in the Pact of Amsterdam, Thematic Partnerships are the key delivery vehicle towards realising the goals of the Urban Agenda for the EU. The Pact of Amsterdam lists 12 Priority Themes for the Urban Agenda for the EU. On each Theme, a Partnership has been or will soon be formed.

Four Partnerships have been set up in the first half of 2016 and have now developed draft Action Plans. These are: Inclusion of Migrants and refugees (coordinated by the City of Amsterdam and DG HOME); Air Quality (coordinated by The Netherlands); Urban Poverty (coordinated by France and Belgium) and Housing (coordinated by Slovakia and the city of Vienna).

The Partnership on Urban Poverty consists of 23 members which represent Member States, Urban Authorities, Regions, stakeholder organisations at EU and international level and the European Commission.

The Partnership was created in the Pact of Amsterdam with the mandate to develop actions aimed at “reducing poverty and improving the inclusion of people in poverty or at risk of poverty in deprived neighbourhoods”, emphasising the need for solutions designed and applied integrating both place-based (urban regeneration of deprived neighbourhood) and people-based (socio-economic integration of people living in neighbourhoods) solutions.
In addition to the focus areas identified by the Pact of Amsterdam, the Partnership decided to focus also on two extreme forms of poverty and social exclusion by giving particular attention to Roma people and the homeless. Thus, the four priorities endorsed by the Partnership are:

- Child poverty;
- Regeneration of deprived neighbourhoods;
- Homelessness;
- Vulnerability of Roma people.

This Public Feedback is part of a process to receive feedback on the actions and recommendations developed by the Partnership on Urban Poverty. The Action Plan would greatly benefit from the insights of relevant stakeholders, who have the opportunity to contribute to the improvement of actions and recommendations proposed.

The results of the Public Feedback will be taken into consideration by the members of the Partnership on Urban Poverty for the preparation of the final version of the Action Plan, which will be presented to the DG meeting on urban matters (DGs responsible for urban matters in their Member States, the European Commission, the CoR, CEMR and EUROCITIES) taking place on 26 October 2017.

The individual contributions to this Public Feedback will not be published on the Internet. At the beginning of the questionnaire, you will be able to choose between providing your personal details or submitting your contribution anonymously.

THANK YOU IN ADVANCE FOR YOUR COLLABORATION!

Target group(s)
Contributions are sought from individuals, from local, regional and national authorities, intergovernmental and non-governmental organisations, social partners and civil society, academic institutions, financial institutions, international organisations, EU Institutions and Agencies, based in EU Member States or third Countries.

Period of the online Public Feedback
From 10/07/2017 to 22/08/2017

How to submit your contribution
You can contribute to this online Public Feedback by filling out the online questionnaire, available hereafter. You may find it useful to refer to the background documents which are published alongside this
consultation.

**Individual contributions to this Public Feedback will not be published on the Internet.** Answers to the online questionnaire will be taken into account by the Partnership as input to a revised version of the Action Plan, which will be published on Futurium before the end of 2017.

**Replies should be submitted in English.**
*Only online submissions will be taken into consideration.*

**Reference documents and websites**

1. [Background Paper to the Partnership on Urban Poverty](#)
2. Pact of Amsterdam in [English](#), [French](#), [German](#) and [Portuguese](#)
3. Futurium – [section dedicated to the Partnership on Urban Poverty](#)

**Disclaimer**

The information and views contained in the Public Feedback are those of the Partnership and do not reflect the official opinion of the European Commission. The Commission does not guarantee the accuracy of the information contained therein. Neither the Commission nor any person acting on the Commission’s behalf may be held responsible for the content and the use which may be made of the information contained therein.

**Contact details**

Secretariat of the Urban Agenda, Communication team
E-mail: [UA.communication@ecorys.com](mailto:UA.communication@ecorys.com)

*1. Are you responding as an individual:*
- ☐ Yes
- ☐ No

*2.a. Are you a public, private or non-governmental organisation?*
- ☐ Public
- ☐ Private
- ☐ NGO

*1.b. In which country is your organisation based?*
- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐
2. Name, surname and position of the respondent (this information will be kept strictly confidential)
1000 character(s) maximum
Cristina Chiotan, Policy Senior Coordinator

3. Name of the institution (if applicable - this information will be kept strictly confidential)
1000 character(s) maximum
EuroHealthNet

4. Email (this information will be kept strictly confidential)
1000 character(s) maximum
1. Integrated actions

The Urban Poverty Partnership identified four priorities: child poverty, regeneration of urban deprived neighbourhoods, homelessness and vulnerability of Roma people. Actions addressing each of these priorities are developed below in chapter 2 to 5. In chapter 1, we present actions that tackle two or more of these priorities in an integrated way.

**Action 1: Cohesion Policy Post 2020: Block Grant for Urban Authorities To Fight Poverty**

**Bottleneck to be addressed**

The effectiveness of European Funds is crucial for the regeneration of deprived urban neighbourhoods. Urban regeneration projects are complex because of the need to adopt an integrated social, environmental, economic, and multi-level approach. These possibilities are very limited under the current funds regulations for the period 2014-2020. For that, the support system should be improved in the next financial perspective, addressing the following pitfalls:

- EU Funds lack concentration to effectively address urban poverty in deprived neighbourhoods, delivering a leverage effect based on the concentration of resources per inhabitant.

- The current regulation of the ESF is fragmented and optional with regard to the support of social inclusion and economic development (regeneration of deprived urban areas); The current ERDF minimum allocation at national level (5%), as well as the potential ESF allocation, are not sufficient to have a real impact on urban deprived areas. The regeneration of urban deprived areas is not targeted explicitly, and some integrated urban development strategies lack a dimension to fight urban poverty;

- In the current framework the ERDF and the ESF lack the necessary flexibility to address through comprehensive and solid strategies the complex causes of urban poverty and their spatial concentration in deprived neighbourhoods.

1. On a scale from 1 to 5 (with 1 being the weakest and 5 the strongest), to what extent you find this issue crucial and why?

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1.a. Please justify briefly your scoring

Comprehensive solutions are indeed needed to tackle complex issues such as urban poverty. It is crucial to, for example, include strategies that tackle health inequality into solutions for social inequality as both are intrinsically linked. Poorer citizens have more health problems and live less long than more wealthy citizens. Health problems accumulate and enhance social problems and vice versa. So far we miss this health perspective into the planned Action on urban poverty.

Action

The Urban Poverty Partnership proposes to establish a Block Grant as the funding instrument to use Structural Funds under a new Urban Thematic Objective (see Action 7: “Cohesion Policy Post 2020: Setting up a new Urban Thematic Objective”). The strategic and governance mechanism proposed to implement this objective and pilot this instrument would be the Local Pact (see Action 8: “Cohesion Policy Post 2020: Local Pact for the Regeneration of Urban Deprived Areas”). In addressing sustainable urban development the Block Grant will have a specific focus on fighting urban poverty. The Block Grant fulfils the need for a clear, ambitious and targeted funding to fight urban poverty.

The proposed Block Grant would have the following characteristics:

- **Multi-fund**: combining or pooling resources from different EU funds (typically the ESF and the ERDF) to achieve leverage in the regeneration of urban deprived areas.

- **Flexible**: through Local Pacts, Block Grants would have the necessary flexibility to adjust to local needs and changing challenges, to combine sectoral policies and to involve all the local stakeholders. For example, enabling re-granting would improve the involvement of the private sector, NGOs, and the development of local initiatives. The Block Grant would be managed by urban authorities (where applicable in the governance structure of the Member States) with flexibility.

- **Integrated**: the Block Grant would focus on integrated urban development approaches and not on thematic concentration. The Block Grant would fund comprehensive strategies developed by urban authorities to tackle urban poverty, and as part of it, regeneration of urban deprived areas. A part of the allocation will be dedicated to fight urban poverty based on integrated area-based urban regeneration strategies developed by urban authorities in the context of the Local Pact (see Action 8). Another part will be earmarked to undertake explicit actions at city level in the fight against child poverty (this way, we guarantee that there is sufficient investment in children), homelessness and exclusion of Roma. Remaining funds can be used to address other relevant aspects or inclusion of vulnerable groups in order to reduce poverty in their territory. The allocation of the Block Grant to each of these concepts will be based on a solid diagnosis developed by urban authorities and shared with relevant stakeholders.

Allocations of funding to beneficiary urban authorities should not only be based on GDP but other indicators should be taken into account to better measure economic, social, and environmental disparities and needs.

The implementation of the Local Pact (Action 8) and this Block Grant depends to a great extent on the ability of partner urban authorities, their budgets and qualified technical staff. Supporting these aspects and simplifying
them in the context of the creation of the new urban thematic objective of the Cohesion Policy (Action 7) is important to strengthen urban authorities’ involvement in these instruments. A part of the technical assistance allocation in the future should be devoted to support and/or reinforce the capacity building of urban authorities, especially the small and medium sized ones.

2. Based on your experience, do you believe that this action would contribute to addressing the abovementioned bottlenecks?

- Mostly Yes
- Partially Yes
- No
- I don’t know

2.a. Please justify briefly your choice

1000 character(s) maximum

The aims of the Block Grant to involve the private sector, NGOs, and to support in a direct way local initiatives is very valuable. Moreover, the ability to earmark funds and undertake explicit actions at city level to fight against child poverty, homelessness and exclusion of Roma is important for addressing health inequalities. However, it is important that actions include an integrated approach which considers social, health, and environmental sustainability issues. For example, as regards fighting child poverty, integrated approaches should be applied including parental programmes, children’s centers and key workers which ensure high quality of maternity services, childcare, health and education services and outreach activities for the most deprived. A proportionate universalism approach should be applied with tailored and targeted actions in most deprived communities and neighborhoods, and universal policies for the whole city.

3. According to your experience, do you believe that the bottleneck presented above could be better tackled through other action(s)?

- Yes
- No
- I don’t know

3.a. If yes, please briefly indicate which actors should be involved in its implementation

1000 character(s) maximum

Evaluated models and scientific evidence on the benefit of specific allocated funds and targeted actions which are used in an integrated way, including health, social and environmental aspects are available here:
INHERIT Baseline report: Exploring triple-win solutions for living, moving and consuming that encourage behavioural change, protect the environment, promote health and health equity: https://www.inherit.eu/baseline-report/
4. Are you aware of initiatives or documentation developed at EU, national or local level that could be relevant for this action?

- Yes
- No

4.a. If yes, thank you for providing relevant details

1000 character(s) maximum

Information of promising practices to ensure appropriate local conditions for sustainable, equitable and healthy lifestyles across Europe is available on INHERIT database available here:
http://www.inherit.eu/resources/about-database/

Action 2: Setting up one-stop-shop in EC website on data on urban poverty based on national observatories experiences

Bottleneck to be addressed

Poverty has a spatial dimension, but there is a lack of open access and awareness of the possibilities to comparable statistical data about poverty, disaggregated at sub-municipal level (district, neighbourhood, census tract, postal code, zip code, etc.). This lack of reliable and comparable data on the spatial and territorial aspects of urban poverty, including data on intra-neighbourhood level, exists also at national level.

Some Member States (France, United Kingdom, Belgium, Spain, Netherlands, etc.) have developed different online visualization or mapping tools (GIS: Geographical Information Systems) that allow local authorities and citizens to have access to poverty indicators at Sub-City District (SCD) level, allowing them to identify their deprived neighbourhoods and to compare their indicators with the national or regional averages.

Most of local authorities in Europe need to have access to poverty statistical indicators with the sufficient spatial disaggregation that would allow them to identify deprivation more precisely. It concerns especially, small and medium size urban areas with less capacity and awareness on how to find and develop relevant knowledge to fight urban poverty. All this useful information should be made available on one unique European website, one-stop shop.

1. On a scale from 1 to 5 (with 1 being the weakest and 5 the strongest), to what extent you find this issue crucial and why?

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1.a. Please justify briefly your scoring

1000 character(s) maximum
There are large differences between and within EU member states, between regions and cities in how long people live (i.e. life expectancy) and how many years they live in good health (healthy life years). Less educated and poor Europeans are more likely to be in worse health and die prematurely than those in more favourable socio-economic circumstances.

The proposed action is valuable through its ability to provide disaggregated data on poverty and socio-economic status at sub-municipal level. Population health outcomes should be included and disaggregated by factors like socio-economic status, gender, ethnicity and education. This type of health and social monitoring system will deliver the information to help plan and implement targeted and cost-effective policies on health inequalities and its determinants at local level; it will provide the ability for policy makers to intervene with tailored actions in most deprived communities, where it is most needed.

Action

This action proposes setting-up of a European network of observatories monitoring both people-based and place-based aspects of urban poverty, which would be useful to inform policies on evidence-based approaches. In particular, setting up an informal network of National Observatories of Urban Poverty/Deprived Neighbourhoods could give the opportunity to exchange visions, ideas, innovative approaches, etc. between the national coordinators of the Observatories of Urban Poverty/Deprived Neighbourhoods.

For Members States interested in creating a National Observatory, the network could also be useful to inform about methodologies and possible obstacles and solutions to establish these observatories. The mid-term perspective would be to constitute a sort of Member States task-force delivering advises, orientations and guidelines on urban poverty data; Eurocities will be also associated. This group of Member states should constitute a kind of task force making the link with EUROSTAT and facilitating and supporting the involvement of national authorities responsible for the development of statistics.

In order to make available and easily accessible to local authorities the outputs elaborated by the National Observatories network (methodologies, tool-kits, indicators, etc. on urban poverty), one unique European website functioning as one stop shop should be set up by the European Commission. One of the functions of the one stop-shop website will be to value and to communicate widely the outputs of the National Observatories task force (guidelines, tools, baskets of indicators) and to make them available for urban authorities with free and easy access.

*2. Based on your experience, do you believe that this action would contribute to addressing the abovementioned bottlenecks?

- Mostly Yes
- Partially Yes
- No
- I don’t know

2.a. Please justify briefly your choice

1000 character(s) maximum
The proposed action is valuable to provide data and information and also evaluated models and practices for most effective and efficient way to intervene to address urban poverty. The importance of these issues is also addressed in the response provided above.

Please note the various themed Observatories will also need to be linked and work together, for example with Health Observatories.

*3. According to your experience, do you believe that the bottleneck presented above could be better tackled through other action(s)?
   - Yes
   - No
   - I don’t know

*4. Are you aware of initiatives or documentation developed at EU, national or local level that could be relevant for this action?
   - Yes
   - No

Action 3: Further development of EU-SILC to incorporate comprehensive and specific indicators related to child poverty at the local level and to harmonise data collection on homelessness

Bottleneck to be addressed

Recent years have brought new and growing attention to the importance of measuring and monitoring children’s well-being and homelessness, two of the priorities identified by the Urban Poverty Partnership. Indicators are increasingly valued as a means to interpret and present statistical data, monitor policy implementation, and provide the ground for evidence-based policies and increased accountability.

Despite progress, there is still a lack of indicators covering some specific domains related to the implementation of children’s rights and to homelessness, which could be used to develop and shape policies and services at national and local level, by identifying objectives and setting targets against a clear timeline.

EU-SILC, provides data on income, poverty, social exclusion and living conditions – domains which are inherently related to child poverty and homelessness. Since 2010, EU-SILC has been used to monitor poverty and social inclusion in the EU, in particular through the Open Method of Coordination (Social OMC) and the Europe 2020 Strategy.

While EU-SILC has been widely used to monitor progress towards tackling poverty and social inclusion, such an instrument presents substantial gaps that call for the system to be reviewed and updated.

In the case of child poverty for instance, EU-SILC only covers people living in private households, limiting the outreach of the data and, therefore, its potential to provide an exhaustive and comprehensive overview of the situation of children at risk of poverty and social exclusion. In other words, statistical instruments such as EU-
SILC, due to their inherent gaps, result in a lack of reliable information with regards to the situation of children and young people in the EU, as they do not provide culturally sensitive data, i.e. data related to specific groups of children, such as those who, due to their circumstances (e.g. living in institutions, homeless children) or characteristics (e.g. children with disabilities, children with a migrant background or belonging to an ethnic minority).

With regards to data on homelessness, Member State collects data using different methodologies, which means that data is not harmonised. For example, an increase by 5% of homeless in one EU Member State does not equate to 5% increase in another country, as methodologies and definitions differ. A unified approach to collecting data will be very useful in monitoring the fight against homelessness. The lack of reliable and harmonised data on homelessness is an obstacle to the assessment of the impact of policies addressed at reducing homelessness.

1. On a scale from 1 to 5 (with 1 being the weakest and 5 the strongest), to what extent you find this issue crucial and why?

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*To what extent you find this issue crucial?

1.a. Please justify briefly your scoring

1000 character(s) maximum

The review and update of EU-SILC to cover more sensitive data and provide an in-depth image of child poverty and homelessness is important to support coordinated action across the EU. Harmonised and comparable data between member states is also key to monitor and prepare EU support to fight health and social inequalities, including poverty and homelessness, between regions and cities.

Action

The action aims at ensuring that indicators on the basis of which statistical data is interpreted and analysed through EU-SILC, are further developed and harmonised.

With regards to child poverty, indicators should be based on a wider range of factors and be able to underline the specific situation of different groups of children on the basis of their age, gender, ethnic background, disability and other variables. In other words, indicators should provide the necessary tools to analyse how policies and services are impacting on all children, taking into account their economic, physical and cultural differences. It is necessary to update and revise the current statistical systems to include sufficiently specific indicators to identify the needs and demands of each group of children, particularly the most disadvantaged.

With regards to homelessness, Member States should be encouraged to implement the ad hoc module on retrospective housing difficulties developed by Eurostat and EU-SILC. Member States should be encouraged to use ETHOS Light as a tool to harmonise data collection. This will ensure that each country is using the same definition of homelessness when monitoring homelessness (taking into account its different typologies).
2. Based on your experience, do you believe that this action would contribute to addressing the abovementioned bottlenecks?

- Mostly Yes
- Partially Yes
- No
- I don’t know

2.a. Please justify briefly your choice

1000 character(s) maximum

The review and update of EU-SILC as well as better use of existing tools for data collection and monitoring is valuable and will enable better information for development of targeted and effective policies as well as support from the EU level.

3. According to your experience, do you believe that the bottleneck presented above could be better tackled through other action(s)?

- Yes
- No
- I don’t know

4. Are you aware of initiatives or documentation developed at EU, national or local level that could be relevant for this action?

- Yes
- No

**Action 4: The provision of statistics on poverty to local authorities, including data on Roma and homelessness**

**Bottleneck to be addressed**

It is only possible to accomplish the recommendation of the Leipzig Charter to “pay special attention to deprived neighbourhoods” if local authorities can identify deprived areas in their territory and understand better poverty in order to design urban regeneration plans able to address the problems identified. Poverty has a spatial dimension, but there is a lack (either in European or/and in national statistics) of reliable and comparable statistical data about poverty, disaggregated at sub-municipal level (district, neighbourhood, census tract, postal code, zip code, etc.), including a lack of data on Roma people and homelessness.

Data on numbers of Roma living in Europe and their profiles remain scarce and cooperation on data collection between EU institutions and local authorities is insufficient. Only few data collections, like the 2011 EC/WB/UNDP data collections ensure comparability. This leads to a lack of knowledge regarding the Roma community and its situation, making it difficult to take measures in order to tackle the obstacles they may face, for example in accessing basic and local services.

At the moment there are not instruments concerning an EU-local level cooperation for data collection on Roma. In 2016, the Court of Auditors published a report on data protection legislation and collection of data on the
basis of ethnicity. The findings and recommendations from this report can be used to design appropriate data collection methods and tools for gathering local data on Roma at EU level.

Policy-making designed to tackle homelessness also faces the lack of harmonized information. In fact, there is no EU agency collecting data on homelessness. However, each Member State collects data using different methodologies and different definitions of homelessness, which makes impossible developing comparative analysis.

1. On a scale from 1 to 5 (with 1 being the weakest and 5 the strongest), to what extent you find this issue crucial and why?

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1.a. Please justify briefly your scoring

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Better data and information on Roma population and homelessness will enable better targeted actions and improved cost-effectiveness and policy making at regional and local level.

Action

For the identification of deprived neighbourhoods and social exclusion, local authorities need to have access to poverty statistical data on income and living conditions, child poverty, homelessness, and the specific Roma situation at SCD (Sub-City District) level in order to be able to map and analyse the spatial dimension of poverty. The specific main actions required are:

- Urban authorities need to have access to poverty statistical information with the highest degree of spatial disaggregation available. Although there are several indicators related to poverty, one of the most relevant is income. Most Member States have detailed information about income with sufficient spatial disaggregation to allow its analysis at SCD-2 level (or neighbourhood, census tract, etc.), but few of them have made them available open access. For this reason, the development of the Regions and Cities Illustrated tool at SCD level (preferably at SCD2 level) and the inclusion of poverty indicators (or at least, income) in this tool is considered crucial. The existing Cities/Urban Audit working group seems to be the best platform to explore the possibility to make this data available in Cities/Urban Audit.

- This statistical information should adopt a multidimensional perspective since poverty and vulnerability have several causes that -alone, or in combination- mean that people may be at risk of exclusion.

- It is necessary to disseminate the statistical information in the different Member States languages, so that it is fully accessible to local authorities and citizens in Cities/Urban Audit.
- A specific action that needs to be undertaken by Eurostat is the development of an indicator (or a set of indicators) on the risk of poverty and social exclusion at NUTS II and NUTS III levels. The new indicator(s) should be developed in collaboration with local authorities and Member States.

- All the above mentioned information should be easily accessible to urban authorities and other actors on the EU one stop-shop urban data portal to access urban relevant information (see Action 2).

- Regarding data-gathering on Roma people it is necessary to give place to action that: i) guarantees a long-term collaboration between local authorities and EU-level agencies such as the FRA and Eurostat, aiming to develop and implement a methodology able to provide local authorities with the correct tools for collecting data about Roma people at local level.; ii) The mentioned methodology should aim to gather data not only on the numbers of Roma people living in their respective territories, but also on the challenges they face to access basic and local services.; iii) In developing this, the national strategies on social inclusion of the Rome people should be taken into account, to enable evidence-based policy and concrete measures for improving Roma inclusion.

- Regarding the development of statistics on homelessness it is important to advance towards reliable and harmonized data in the EU taking into account what has been pointed out above on the development of statistical information on urban poverty, and the definition of adequate methodological frameworks for the specific analysis of homelessness. The development of this recommendation has to be implemented taking into account Action 3 of this Action Plan, which addresses specifically the improvement of EU-SILC.

* 2. Based on your experience, do you believe that this action would contribute to addressing the abovementioned bottlenecks?

- Mostly Yes
- Partially Yes
- No
- I don’t know

2.a. Please justify briefly your choice

1000 character(s) maximum

The indicator (or a set of indicators) on the risk of poverty and social exclusion, data gathering on Roma people and homelessness should include health status and access to health care to enable integrated policies and actions. Research has shown that people at risk of poverty and social exclusion have a poorer health status than people from higher socio-economic groups. This creates a vicious circle of disadvantage, with people at risk of poverty and social exclusion having lower rates of good health, including mental and physical illnesses, which are a barrier in accessing jobs, getting out of poverty and reintegrating labour market.

* 3. According to your experience, do you believe that the bottleneck presented above could be better tackled through other action(s)?

- Yes
- No
- I don’t know
4. Are you aware of initiatives or documentation developed at EU, national or local level that could be relevant for this action?

- Yes
- No

2. Child Poverty

Action 5: Adoption of a European Child Guarantee

Bottleneck to be addressed

The 2013 Recommendation Investing in Children, Breaking the cycle of disadvantage (IC-BCD Recommendation) is the most recent instrument adopted by the European Commission in the field of child poverty, recommending Member States to “organise and implement policies to address child poverty and social exclusion, promoting children’s well-being, through multidimensional strategies”. According to the IC-BCD Recommendation, Member States should develop these policies by acting in an integrated way along three pillars: access to adequate resources; access to affordable quality services, and; children’s right to participate.

Even though a number of initiatives to tackle child poverty exist, overall, there is a lack of political and financial investment in children and young people at EU level (and at other levels of government), which implements integrated investment and adopts a children approach based on the 3 pillars of the IC-BCD Recommendation. This lack of investment is leading to unchanged poverty levels with children being the age group most affected by poverty.

The positive evolution of employment rates in the EU in the recent past, “is not reflected in poverty figures”. The rate of children at risk of poverty and exclusion (AROPE) is not improving significantly in the EU, as figures are not improving for the general population. Employment strategies – which have been strongly prioritised by the EU and Member States – are not sufficient to tackle poverty. The problem is that the unbalance between the level of commitment to strengthening the labour market versus the level of commitment to structurally tackling poverty through an integrated rights-based approach that ensures access to quality jobs, services and social protection and commitment to redistribute tax/benefit policies.

1. On a scale from 1 to 5 (with 1 being the weakest and 5 the strongest), to what extent you find this issue crucial and why?

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1.a. Please justify briefly your scoring

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Investment in children makes sense – morally, economically, socially and politically. It is the only sustainable way of overcoming social and economic inequalities in the long term, and of reaching the Europe 2020 anti-poverty headline target. Growing up in poverty can negatively affect children's opportunities for the rest of their lives, with far-reaching consequences in relation to their future participation in the labour market and society. Acting early on child poverty and well-being is not only a moral imperative, it is cost-effective.

Using EU Funds for the delivery of the Recommendation is essential. Further national seminars are needed to promote the Recommendation with managing authorities, particularly in view of the allocation of 20% of the European Social Fund to social inclusion and poverty reduction. Involvement of civil society and other stakeholders – in particular, but not only, members of the EU Alliance for Investing in Children is key.

**Action**

If Europe wants to «act big» on child poverty, it needs to foster shared responsibility between all levels of government and encourage the establishment of a Child Guarantee, which takes into consideration the European Pillars of Social Rights. The Child Guarantee can be the tool to realise concrete investments that benefit children and young people in Europe. In order to do so, the EU and Member States must recognize that investing in children in the early years is a key strategy to tackle poverty as a whole and offer equal opportunities to all EU citizens.

The action requires acting on a number of separate sub-actions:

- Define a set of realistic objectives and measurable targets that are associated with these objectives;

- The EU and Member States commit to guaranteeing children's rights as a cornerstone to tackle the poverty rate in the EU;

- The EU and Member States' commitment shall be supported by adequate funds (intermediary and/or pilot measures could be financed by the re-allocation of ESF and/or ERDF unallocated budgets). The use of these funds will be closely monitored and evaluated.

- Member States have in place a child rights-based national plan or strategy for the fight against child poverty, which demonstrate ownership from all levels of government and across sectors; national plans could be complemented by local plans for the urban authorities where child poverty is rising or already very high.

The action further implies that:

- Member States must acknowledge all levels of government, civil society organisations and beneficiaries have a role to play and should be duly involved in any strategic or reform process in relation to tackling child poverty (vertical integration).

- Member States must pay particular attention to the challenges faced by their urban areas and local
authorities: their services and staff are at the frontline of dealing with the majority of households facing poverty.

-To further promote investment in children, extra flexibility should be considered in the monitoring of national budget expenditure (Stability and Growth Pact), for example by excluding certain forms of social investment (if not indefinitely, at least temporarily) and specifically investments that concern children from Member states’ deficit control mechanism.

**2. Based on your experience, do you believe that this action would contribute to addressing the abovementioned bottlenecks?**

- Mostly Yes
- Partially Yes
- No
- I don’t know

2.a. Please justify briefly your choice

*1000 character(s) maximum*

The action includes several very valuable elements, such as set of realistic objectives and measurable targets, the use of targeted funds to be monitored and evaluated and national policies should be complemented by regional and cities plans.

The establishment of a Child Guarantee, also in relation to the European Pillar of Social Rights, is crucial and should include indicators in the Social Scoreboard and integrate funding and analysis within the EU Semester process. Targets for reducing child poverty and social exclusion should be included in national and sub-national action plans and applied to effectively drive policy development tied to resources.

**3. According to your experience, do you believe that the bottleneck presented above could be better tackled through other action(s)?**

- Yes
- No
- I don’t know

**4. Are you aware of initiatives or documentation developed at EU, national or local level that could be relevant for this action?**

- Yes
- No

**Action 6: Progress towards a directive on investing in children based on the Recommendation Investing in Children: Breaking the Cycle of Disadvantage**

**Bottleneck to be addressed**

The 2013 Commission Recommendation Investing in Children, Breaking the cycle of disadvantage (IC-BCD Recommendation) is the most recent instrument on child poverty adopted by the European
Commission in the context of the Social Investment Package (SIP). In this document, the Commission recommends Member States to “organise and implement policies to address child poverty and social exclusion, promoting children’s well-being, through multidimensional strategies” in accordance with a number of guidelines or framework. This framework includes:

1. A set of horizontal principles that should guide the development of policy/reform.

2. Three pillars. Member States should act on namely access to adequate resources (acting on households’ income), access to affordable quality services (acting on the provision of services to children in the areas of ECEC, health, housing, education, care settings) and children’s right to participate (in recreational-sport-cultural activities and in decision making “that affects their lives”).

3. More/better governance, implementation and monitoring arrangements.

4. Full use of EU instruments including existing funding opportunities.

The Child Guarantee (envisioned under Action 5) would be a valuable step in the right direction but it wouldn’t cover all pillars, aspects and policy mechanisms cited in the Recommendation IC-BCD. As such, the Recommendation is a comprehensive, integrated, child-rights-based set of soft policy measures but it has not led to significant reforms at national and/or regional level with direct impact in urban areas and significant decrease of child poverty.

1. On a scale from 1 to 5 (with 1 being the weakest and 5 the strongest), to what extent you find this issue crucial and why?

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1.a. Please justify briefly your scoring

1000 character(s) maximum

The lack of monitoring mechanisms, target indicators at national and sub-national level and strong coordinated actions and support from EU level have impeded the full development and implementation of measures as established in the Recommendation.

Action

In order to have a real impact in the fight against child poverty in urban areas, the partnership advocates to go one step further than the above-mentioned Child Guarantee and to strengthen the legislative body at EU level in order to promote the effective implementation of children’s rights in all EU Member states by introducing: first, robust monitoring in the European Semester of an indicator related to investment in children and second, moving towards a directive on investing in children.
The partnership proposes a two-phased approach. In a first phase, the European Semester should include strict monitoring of reforms based on a new indicator related to investment in children. In a second, medium to long term phase, the Recommendation should be taken a step further and should constitute the basis of a Directive under the European Pillar of Social Rights that recognises, as one of its key principles, children’s right to protection from poverty and the necessity of specific measures to enhance equal opportunities of children from disadvantages backgrounds. This regulation, as a comprehensive and binding body of legislation will enact Member States’ engagements in relation to children’s rights (CFR).

2. Based on your experience, do you believe that this action would contribute to addressing the abovementioned bottlenecks?

- Mostly Yes
- Partially Yes
- No
- I don’t know

2.a. Please justify briefly your choice

1000 character(s) maximum

The development of stronger mechanisms for monitoring and support of the implementation of the Recommendation are very important. The measures proposed by the Action are very valuable and we support the development of a Directive under the European Pillar of Social Rights. Moreover, an EU Roadmap for the implementation of the Recommendation should be included - i.e. a visible plan which establishes specific objectives, key milestones with timeline and concrete allocation of resources, highlighting the role of different actors and government levels. In the current context of trying to rebalance social and macroeconomic priorities, the European Semester and the European Pillar of Social Rights should be more effectively used to monitor and evaluate implementation of the Recommendation.

3. According to your experience, do you believe that the bottleneck presented above could be better tackled through other action(s)?

- Yes
- No
- I don’t know

4. Are you aware of initiatives or documentation developed at EU, national or local level that could be relevant for this action?

- Yes
- No

3. Regeneration of deprived neighbourhoods

Action 7: Cohesion Policy Post 2020: Setting up a new Urban Thematic Objective
Bottleneck to be addressed

The Cohesion Policy for the programing period 2014-2020 has been structured (and is being implemented) around 11 thematic objectives supporting growth. Each of the Structural Funds prioritises different objectives (ERDF 1-4, Cohesion Fund 4-7 and 11, ESF 8-11, although ESF can also support objectives 1-4).

The funds are challenge-oriented, not territorially-oriented, especially those that focus on urban deprived areas. In fact, in Article 7 of the ERDF, there is not a specific urban objective in which action to tackle urban poverty could be framed.

The funds oriented to the implementation of regeneration strategies within the framework of the Cohesion Policy, and particularly the ERDF and the ESF, do not share the same logic of intervention, making it difficult for local authorities to combine funding from both sources in the context of integrated initiatives which tackle the complex challenges of deprived neighbourhoods through a holistic approach.

This results in segmented strategies for urban areas, and difficulties to manage integrated strategies, particularly when the ERDF and the ESF need to be combined.

1. On a scale from 1 to 5 (with 1 being the weakest and 5 the strongest), to what extent you find this issue crucial and why?

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1.a. Please justify briefly your scoring

1000 character(s) maximum

In times of simplification, it does not make much sense to add another thematic objective. It would be more beneficial to broadening or specifying existing ones to include urban poverty, or simplifying the integration of funds. Certain areas (or regions) should probably not be favoured over others. (By including *urban* poverty, one automatically excludes *rural* poverty.)

Action

This action proposes setting up a new urban thematic objective in the Cohesion Policy post 2020. It will support integrated strategies avoiding ERDF and ESF segmentation and allowing the combination of financial resources for the regeneration of urban deprived areas. Taking into account that the new instruments should be simple to be implemented to national authorities, regions, and urban authorities. They also should make possible the active engagement of the citizens and local population to gain credibility, ownership, as well as effective grass-root initiatives.

The regeneration of urban areas affected by urban poverty should be a priority in the next programming period of the Cohesion Policy (post 2020) under the new proposed thematic objective (action 7), which would see an increase in the minimum national allocation of the ERDF (currently 5%) and also introducing a minimum
national allocation of the ESF for sustainable urban development.

The new urban thematic objective in the Cohesion Policy post 2020 will address sustainable and integrated urban development through the definition of a simple regulatory framework able to overcome the sectoral approach and substitute it for a territorial and area-based understanding of urban deprivation with a focus on fighting urban poverty. Actions within this thematic objective will be funded under a Block Grant for urban authorities to fight urban poverty (see Action 1).

The new urban thematic objective should be defined by the EU, Member States, the regions, the urban authorities, and other relevant stakeholders with an important implication of the UPP. Urban authorities must be able to develop a shared analysis and diagnosis related to urban poverty with the support of relevant authorities so that they are taken into account in the final definition of the urban thematic objective.

The identification of the urban deprived areas should be done at least by national authorities (Member States) in collaboration with the local authorities based on their diagnosis and strategies.

* 2. Based on your experience, do you believe that this action would contribute to addressing the abovementioned bottlenecks?

- Mostly Yes
- Partially Yes
- No
- I don't know

2.a. Please justify briefly your choice

1000 character(s) maximum

The action proposed creates the possibility of better targeted interventions aiming at reducing discrepancies and inequalities but only for city level, which excludes rural level.

Any thematic objective should include health, social and environmental issues in an integrated approach with a focus on social and health equity. The measures should enable and promote healthier behaviours and sustainable environments, and address challenges posed by climate change, inclusion adaptation and mitigation measures. Moreover, the action should target the most deprived communities, where people are more exposed and vulnerable to environmental risks (like heat waves, air pollution, noise) according to the Science for Environment Policy 2016.

* 3. According to your experience, do you believe that the bottleneck presented above could be better tackled through other action(s)?

- Yes
- No
- I don't know

* 4. Are you aware of initiatives or documentation developed at EU, national or local level that could be relevant for this action?

- Yes
- No
Action 8: Cohesion Policy Post 2020: Local Pact for the Regeneration of Urban Deprived Areas

Bottleneck to be addressed

The convergence and the socio-spatial consequences of impoverishment concentrate poverty in disadvantaged neighbourhoods. In order to address this challenge, it is necessary to tackle urban poverty adopting a place-based approach that takes into account all the inhabitants and their necessities (people-based approach). The fight against urban poverty should be formalised on the basis of integrated urban place-based interventions in the context of a EU urban poverty reduction policy that adopts a targeted and integrated approach towards the most deprived neighbourhoods. However, under the current Cohesion Policy (2020), urban authorities face a number of obstacles to develop relevant approaches to tackling urban poverty:

First, urban authorities do not count with the necessary flexibility to address the complex causes of urban poverty through integrated urban regeneration programmes. Integrated sustainable urban development strategies are managed centrally, at the level of national operational programmes co-funded by ERDF. The territorial impact of the actions implemented in deprived areas is not sufficiently taken into account.

Second, urban authorities do not always apply a place-based approach in their urban regeneration strategies. Under the ERDF Regulation, urban authorities can implement Integrated Territorial Interventions (ITI), but this instrument is not been successful in organizing and implementing at the same time multi-fund and area-based approaches.

Third, EU funds are too dispersed, while a higher spatial concentration and intensity would be more effective to address urban poverty in deprived neighbourhoods.

1. On a scale from 1 to 5 (with 1 being the weakest and 5 the strongest), to what extent you find this issue crucial and why?

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Information of promising practices across Europe is available on INHERIT database available here: http://www.inherit.eu/resources/about-database/
A place-based approach has for long been advocated by health promotion professionals (since Ottawa charter). For example, NHS Health Scotland recently published their award-winning tool: "The Place Standard" tool which lets communities, public agencies, voluntary groups and others find those aspects of a place that need to be targeted to improve people’s health, wellbeing and quality of life. The Place Standard tool provides a simple framework to structure conversations about place and community. Its questionnaire format allows you to think about and assess (1) the physical environment - the buildings, streets, public spaces and natural spaces that make up a place, and (2) the social environment - the relationships, social contact and support networks that make up a community. 
http://www.healthscotland.scot/tools-and-resources/the-place-standard-tool

The key is to involve appropriate actors at all levels.

Action

In order to address urban poverty in urban deprived areas under the new Urban Thematic Objective of the Cohesion Policy (see action 7), the UPP proposes the creation of Local Pacts for the regeneration of urban deprived areas in a multi-level, strategic, and multi-annual perspective for the period 2021-2027.

The Local Pact would have the following characteristics:

- Mixed place-based and people-based approach: Upgrading the urban deprived areas should be done understanding the needs and difficulties felt by people in poverty situation and living in deprived areas, as well as on analysis of the causes. The Local Pact would enable the design of adequate strategies (including appropriate quality services) based on the integration of a place-based and people-based approach.

- Multi-fund: The Local Pact would combine or pool resources from different EU funds, typically the ESF and the ERDF, achieving leverage effects in the urban regeneration of deprived areas.

- Flexible: The Local Pact would enable adjustments to local needs and to the evolution of changing challenges. It would also combine sectoral policies.

- Multi-level: Local Pacts address both city-wide challenges as well as specific challenges of urban deprived areas. Under the leadership of urban authorities, and based on urban authorities’ diagnoses and strategies, they involve several levels of government (local, regional, national) and different types of stakeholders. Local Pacts should also be participative, through the setting-up of Local Committees of Users and Inhabitants (LCUI).

The Local Pact aims to give place to integrated urban regeneration interventions including the following four dimensions to tackle urban poverty:
- Urban regeneration/living environment: living environment, public space, housing, transport, equipment, facilities, services and economic development.

- Social cohesion: education, employment, health, integration, and access to jobs and skills, actions focused on vulnerable social groups, fight against child poverty, and integration of homeless and marginalized communities.

- Inclusive economic development: economic activity and business creation in urban deprived areas, transition to formal economic activities.

- Environment/energy: energy efficiency in housing and urban regeneration programmes, fight against climate change, etc.

The Local Pact will be tested through an URBACT Pilot Action. The URBACT method could be useful for modelling, testing such a partnership framework and designing some guidance for the upcoming programming period.

*2. Based on your experience, do you believe that this action would contribute to addressing the abovementioned bottlenecks?*

- Mostly Yes
- Partially Yes
- No
- I don’t know

2.a. Please justify briefly your choice

1000 character(s) maximum

We support the creation of Local Pacts to enable better targeted and use of funds and increased benefits for local communities and direct positive impact for people. Attention should be given to health and health equity dimensions as well as creating supportive environments for more healthy and environmental sustainable lifestyle for all. More information on how to achieve this and evidence from research and practice is available in INHERIT baseline report and promising practices database, available here: https://www.inherit.eu/

*3. According to your experience, do you believe that the bottleneck presented above could be better tackled through other action(s)?*

- Yes
- No
- I don’t know

*4. Are you aware of initiatives or documentation developed at EU, national or local level that could be relevant for this action?*

- Yes
- No

4.a. If yes, thank you for providing relevant details
4. Homelessness

**Action 9: Ending homelessness by 2030, through the reform of social inclusion strategies at the national level**

**Bottleneck to be addressed**

Homelessness is on the rise across the EU, yet there is no EU target to end homelessness and policy makers at national level are not encouraged to fight this problem. In 2010, under the Presidency of Belgium, a European Consensus Conference on homelessness led to the identification of a comprehensive set of principles and recommendations to effectively put an end to homelessness. Following the conference many EU bodies (European Parliament, Commitee of Regions, Economic and Social Committee, EPSCO council) supported its results. To date, this conference is still a reference in the way forward to end homelessness, notably acknowledging the efficiency of housing-led policies. These “policy approaches identify the provision and/or sustaining of stable housing with security of tenure as the initial step in resolving or preventing situations of homelessness. Moreover, metrics for measuring poverty generally exclude homelessness, while social inclusion strategies to access EU funds are required to include people who are homeless.

Experience shows that the active engagement of European, national and local policy makers in the fight to end homelessness in the EU needs to be i) underpinned by a specific target detailing both a deadline and the reduction to be achieved and ii) incentivised through the distribution of European funds.

The EU has an anti-poverty target for 2020 in which is aims to lift 20 million people out of poverty, yet Currently the European Commission is not set to meet this target. Notably, the draft of the European Pillar for Social Rights recognises the right to shelter and to housing for all individuals within the EU.

Beyond the European level, each Member State and the EU as a whole, has committed under the United Nations Sustainable Development Goal (SDG) 1 to end poverty in all forms by 2030, this implicitly includes a commitment to end homelessness, an extreme form of poverty in the EU. While setting an EU target to end homelessness is not new, and only clarifies existing international commitments, its re-affirmation is an important tool for policy makers, at all levels, to use to ensure homelessness remains a top priority.

1. On a scale from 1 to 5 (with 1 being the weakest and 5 the strongest), to what extent you find this issue crucial and why?

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1.a. Please justify briefly your scoring

1000 character(s) maximum

Removing people from homeless situations represents a key step for combating extreme poverty and social exclusion and to further enable health and social support and integration into the labour market. Progress within a potential EU Pillar of Social rights is important.

Action

At EU level, a target is needed to motivate all relevant stakeholders to end homelessness. The lack of specific targets under the Europe 2020 Strategy, in a time where homelessness has grown significantly throughout the EU, shows that in the absence of targets specifically on homelessness, policies and strategies will fail to reduce it. Re-affirming the target to end homelessness in the EU further encourages policy makers at European, national and local level to pursue other actions proposed by the Homeless Working Group.

“Homelessness” can be a disputed term. What constitutes homelessness is clearly defined and agreed upon in the ETHOS Typology on Homelessness and Housing Exclusion. This typology should be a reference for all actions pursuing the end of homelessness, understood as falling under four categories: rooflessness, houselessness, insecure housing and inadequate housing. When re-affirming a target, it should be made clear what constitutes “ending homeless”. It is proposed that it should include the following i) no one sleeping rough, ii) no one living in emergency accommodation for longer than an “emergency” situation, iii) no one living in transitional accommodation longer than is required for a successful move-on, iv) no one leaving an institution without housing options and v) no young people becoming homeless because of the transition to independent living.

At national level, Member States that request the use of European Structural Funds must be asked to develop National Social Inclusion Strategies that include specifically an aim of the inclusion of homeless persons. This action will incentivise the Member States to consider the vulnerable situation of these people as well as encourage policy makers at the local, regional, and national level, to request increased resources to invest in evidence based solutions and push for the use of harmonized data collection (see Actions 3 and 4).

Member States should be encouraged to develop and implement an integrated strategy for ending homelessness in line with the recommendations put forward during the 2010 European Consensus Conference on Homelessness, shifting from the “management” of homelessness towards the effective end of homelessness. In this respect, Housing led and Housing First policies should be encouraged. The development of National Strategies will empower urban authorities and regional actors in the pursuit of ending homelessness. The causes of homelessness can often be triggered by national level policies, but the solutions often come from the local level.

2. Based on your experience, do you believe that this action would contribute to addressing the abovementioned bottlenecks?
An integrated strategy, as proposed by the Action, should include the comprehensive provisions mentioned in the European Pillar of Social Rights, i.e. housing assistance for everyone in need, the right to housing and housing security, universal access to adequate shelters for everyone in a homeless situation, and reintegration of homeless people into society through active inclusion programmes, adequate health and social services. The criteria for adequate housing should pay attention to health related issues, e.g. mould, dampness, inappropriate heating and cooling systems, energy deficiency or exposure to noise and other health related risks.

* 3. According to your experience, do you believe that the bottleneck presented above could be better tackled through other action(s)?

- Yes
- No
- I don’t know

* 4. Are you aware of initiatives or documentation developed at EU, national or local level that could be relevant for this action?

- Yes
- No

**Action 10: Capacity building for the use of the EU funds to end homelessness**

**Bottleneck to be addressed**

Capacity Building for effective EU Structural & Investment Funds (ESIF) in the fight to end homelessness: the ERDF, the ESF and the FEAD (Fund for European Aid to the most deprived) could provide a lever for better progress in reducing and ending homelessness. They could help shift from “managing” to “ending” homelessness, for example building capacity to shift from the staircase model of providing homeless services to housing led and housing first. Ending homelessness requires boosting investment in prevention and ensuring that people who become homeless are provided with proper, evidence based, housing solutions.

To date funds have not been used to the maximum of their efficiency for this purpose. The so-called “creaming” effect means that ESIF rarely reaches people in the most vulnerable situations. Some excellent practices exist. However, the opportunity to invest ESIF in supporting people to sustainably exit homelessness, has not been fully seized. Capacity Building for the use of the funds, in the context of homelessness, can act as a simple but important step in assisting actors at the Member States and local levels to use the funds more efficiently.
European Funds have the capacity to be used in the context of preventing and fighting homelessness. However, only in a small portion the funds focus on this issue. Moreover, investments made are not always in line with the established evidence base on how to actually end homelessness. There is a lack of knowledge and shared practices about how the European Funds can be used in the context of homelessness, specifically in utilising the funds for housing led solutions.

1. On a scale from 1 to 5 (with 1 being the weakest and 5 the strongest), to what extent you find this issue crucial and why?

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1.a. Please justify briefly your scoring

While the European Code of Conduct on Partnership exists and calls for the involvement of social partners in all stages of the planning, implementation and monitoring of ESIF projects, its implementation and effectiveness is often lagging behind expectations. Increasing capacities (TO11) and awareness of managing authorities directly regarding specific issues like homelessness is very beneficial to achieve the most efficient use of the funds.

Action

Managing authorities and those responsible for the implementation and management of the funds will benefit from training on the use of the funds focusing on homelessness. Topics covered will include:

- How to end homelessness.

- Multi-fund programming.

- Blended financial instruments.

- Unit Costs.

- Transnationality.

A special effort will be made to focus the attention of the capacity building seminars on the use of housing led solutions and housing first. A gradual shift has been seen in recent years towards the housing first model of service provision, this shift can be accelerated using the funds.

This action will be facilitated through a series of seminars on addressing homelessness with the ESIF; Multi-fund programming, blended financial instruments, unit costs and transnationality are all key topics. The
seminars will be organised by the European Commission, supported by FEANTSA and other potential experts including managing authorities, beneficiaries, members of the Urban Poverty Partnership of the Urban Agenda for the EU, the EIB etc.

2. Based on your experience, do you believe that this action would contribute to addressing the abovementioned bottlenecks?

- Mostly Yes
- Partially Yes
- No
- I don’t know

2.a. Please justify briefly your choice

1000 character(s) maximum

Training courses and awareness raising seminars should be organised with Managing Authorities. The inclusion and participation of civil society and researchers as well as targeted groups to identify needs and learn from real-life situations that need to be addressed is key. The topics covered should include comprehensive approaches as mentioned in the European Pillar of Social Rights and health related risks associated with inadequate housing to avoid investment in inappropriate housing and shelters.

3. According to your experience, do you believe that the bottleneck presented above could be better tackled through other action(s)?

- Yes
- No
- I don’t know

4. Are you aware of initiatives or documentation developed at EU, national or local level that could be relevant for this action?

- Yes
- No

5. Vulnerability of Roma people

Action 11: Adoption of an Integrated Roma Framework from a Multi-Level Governance Approach

Bottleneck to be addressed

Under the EU Roma Framework that runs until 2020, Member States have committed to develop and implement National Roma Integration Strategies. To date, the main problem is the lack of integrated and coordinated approach to Roma integration, as current national strategies are a collection of thematic actions and projects relevant for Roma (on housing, on employment, on education, on healthcare), but often lack a coordinated, integrated approach. As such, the national strategies promote a fragmented approach to Roma
inclusion. This is an issue because some policies can have competing or conflicting objectives and thus generate adverse effects to Roma integration.

In other words, it is not sufficient to divide relevant actions or funding in themes of housing, education, employment and health, but these areas need to be connected into an integrated framework that takes into account the diversity at local level, and at the same time addresses core horizontal issues such as discrimination against Roma and their lack of participation. Roma inclusion should be mainstreamed in inclusive policies and services for all people. Mainstreaming a Roma inclusion perspective in sectorial and development policies is more effective than adopting sectorial Roma integration policies.

The EU, national and local authorities, should work together to make Roma integration a transversal issue across policy sectors and across departments, by means of an integrated framework.

1. On a scale from 1 to 5 (with 1 being the weakest and 5 the strongest), to what extent you find this issue crucial and why?

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1.a. Please justify briefly your scoring

1000 character(s) maximum

Integrated and comprehensive approaches are crucial for developing policies and interventions to support Roma inclusion. An integrated approach is valuable if national policies are mainstreamed at local level and adapted to the needs of each community and its local specificity and should include social, education and health promotion services. A stronger focus should be put on outreach activities and Roma mediators programmes.

Action

There is a need for a long-term vision on the integration of marginalised Roma people in our societies and to make them an objective for our communities. This vision can be realized through: i) the integration of policy, legal and funding instruments in a renewed EU Roma framework post-2020 that should promote a coherent approach to Roma integration; ii) the mainstreaming of the Roma perspective in all policies. The focus should be on integrated programmes and policies to replace thematic one-off projects.

While the focus would be on mainstream policies from an inclusive approach, a particular emphasis on the specific problems, needs and degree of deprivation of Roma (e.g. Roma children) should remain; this would mean bringing a ‘Roma lens’ into all mainstream policies to ensure they are inclusive for Roma people.

The EU framework post-2020 should adopt an integrated approach to Roma integration with a multi-level governance coordination, by joining efforts of national governments to those of regional and local authorities. The integrated approach should consist of a coordinated strategy and action plan across ministries. This means that Roma concerns should be mainstreamed into education, employment, health, housing and other
relevant policies. Mainstreaming should be ensured and monitored both at EU level as well as at national and local level. Services need to be joined up and actions coordinated (e.g. education, employment, housing) at all levels of government to achieve real improvement in the lives of Roma people.

This new EU approach to Roma integration should be applicable to all EU Member States. Member States should continue to update and improve their national Roma integration strategies by adopting a coherent, integrated approach, they should also find effective ways to mainstream the Roma perspective into all relevant policies.

*2. Based on your experience, do you believe that this action would contribute to addressing the abovementioned bottlenecks?

- Mostly Yes
- Partially Yes
- No
- I don’t know

2.a. Please justify briefly your choice

1000 character(s) maximum

An integrated approach is valuable only if national policies are reflected at local level and adapted to each community, to its cultural specificity and needs. Actions should include social, education and health promotion services. Increased funding should be ensured for outreach activities and Roma mediators programmes, which enable to reach for the most deprived and isolated Roma communities; they have proven successful for supporting disease prevention and health promotion programmes, such as vaccination, parenting programmes, health education for pregnant women and newborn. Other living conditions should also be considered, such as adequate sanitation and clean water, energy poverty or dietary needs for children (i.e. school and medical services that prevent nutritional deficiencies in children). Local authorities can play an important role, i.e. with financial support they could organise school meals and after school facilities to improve school attendance and performance.

*3. According to your experience, do you believe that the bottleneck presented above could be better tackled through other action(s)?

- Yes
- No
- I don’t know

*4. Are you aware of initiatives or documentation developed at EU, national or local level that could be relevant for this action?

- Yes
- No

4.a. If yes, thank you for providing relevant details

1000 character(s) maximum
Action 12: Strengthening the desegregation principle in EU urban areas

Bottleneck to be addressed

In European urban areas, marginalised communities face multiple forms of exclusion, and their living arrangements are often concentrated in space. Therefore, many groups, among them Roma and other ethnic minority groups, live spatially segregated and generally in much worse housing conditions as the majority of society. Roma and other marginalised groups often suffer also from educational segregation, which not only impedes social interaction with the majority of society but also means education of significantly worse quality and high early school dropout rate.

Educational and/or residential segregation results in worse outcomes in educational levels, labour market participation, health, and in growing poverty. Beyond physical separation, social separation is exacerbated by unequal access to mainstream, inclusive and high-quality services. In the case of marginalised Roma groups across European urban areas, these problems have led to wasted resources and unbalanced social, political and economic developments.

The Racial Equality Directive (2000/43/EC) sets out the obligation of all Member States to combat discrimination and prevent in particular discrimination based on the grounds of racial or ethnic origin notably in social protection, education and access to and supply of goods and services, including housing. ESI Funds cannot be used to perpetuate segregation, which falls within the scope of discriminatory treatment. Moreover, Regulation (EU) No 1303/2013 - Common Provisions Regulation (CPR) obliges the Member States to prevent any discrimination based on racial or ethnic origin, during the preparation and implementation of programmes.

In practice, the most explicit tool to support actions against segregation is a (non-binding) set of recommendations in the Commission’s ‘Guidance for Member States on the use of European Structural and Investment Funds in tackling educational and spatial segregation’ for better planning, more effective local level implementation and monitoring.

1. On a scale from 1 to 5 (with 1 being the weakest and 5 the strongest), to what extent you find this issue crucial and why?

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<th>1- Weakest</th>
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Our learning from EU co-funded studies such as DETERMINE showed the value and importance of actions towards desegregation for social, health and other fields as set out above.

**Action**

For the forthcoming implementation period of ESI Funds (2021-2027), the desegregation principle should be strengthened by mainstreaming it into the legislation, building on local level planning and implementation lessons learnt from local best practices.

According to this legislation, national and local governments should assess the level of residential and educational segregation in their urban areas and introduce adjustments to their planning and investment strategies to combat it. They should align policies by fully committing to the core recommendations of the Guidance Note, most importantly, by considering the desegregation principle as the first option in all housing and educational programmes.

Consequently, urban authorities in their comprehensive strategy should include concrete measures mitigating housing and educational segregation. For example, in the field of housing, supply of social housing in integrated neighbourhoods should be increased, mobility of Roma families from segregated neighbourhoods to integrated neighbourhoods should be promoted whilst settlements in worst conditions should be eradicated. School district design and enrolment incentives should serve more balanced opportunities for children to enrol in quality education options.

In countries, where the relevant policy fields do not fall to the local governments’ competences, mechanism should be set up enabling urban authorities to efficiently influence/push the higher level policy makers to intervene nationally, regionally, and also locally in favour of desegregation.

*2. Based on your experience, do you believe that this action would contribute to addressing the abovementioned bottlenecks?*

- Mostly Yes
- Partially Yes
- No
- I don’t know

2.a. Please justify briefly your choice

1000 character(s) maximum

*3. According to your experience, do you believe that the bottleneck presented above could be better tackled through other action(s)?*

- Yes
4. Are you aware of initiatives or documentation developed at EU, national or local level that could be relevant for this action?

- Yes
- No

**Action 13: Ease urban authorities’ access to EU funding in parallel to introducing local ex-ante conditionalities regarding – among others – Roma inclusion**

**Bottleneck to be addressed**

The EU requires Member States to set Roma inclusion strategies at national level. It would not be justified to require such strategies at local level generally, but it is justified to require strategies from urban authorities that are faced with high levels or high risk of poverty and exclusion of Roma. Urban authorities, being closer to the problems and knowing better the potential solutions than central governments, could use EU funds more effectively.

However, for various reasons, national and regional authorities are often reluctant to give access to appropriate EU funding and sufficient flexibility to urban authorities to determine the ways how ESIF resources should be spent. Moreover, local authorities found difficulties to implement EU instruments according to the regulations of the European Funds, mainly because of the red-tape and complexity of the formal procedures to access funding, to develop the programs, and to report about expenditure justification.

1. On a scale from 1 to 5 (with 1 being the weakest and 5 the strongest), to what extent you find this issue crucial and why?

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1.a. Please justify briefly your scoring

*1000 character(s) maximum*

**Action**

In order to demonstrate that urban authorities are able to plan and implement Roma inclusion programmes and
thus use EU funds effectively, local ex-ante conditionalities should be introduced in the ESIF legislation after 2020.

Local ex-ante conditionalities can be introduced with the ESIF legislation after 2020. The advantage of the action is that it improves linkages between policies and funding. Urban authorities which fulfil the ex-ante conditionalities should get more direct access to sufficient EU funding to implement their integrated plans for Roma inclusion.

The setting-up of financial instruments for financing the integrated strategies should also be explored in a complementary way and in articulation with the allocation of EU funds. The specific formulation of local ex-ante conditionalities depends on the architecture of the ESIF legislation after 2020.

* 2. Based on your experience, do you believe that this action would contribute to addressing the abovementioned bottlenecks?
   ○ Mostly Yes
   ○ Partially Yes
   ○ No
   ○ I don’t know

2.a. Please justify briefly your choice
1000 character(s) maximum

* 3. According to your experience, do you believe that the bottleneck presented above could be better tackled through other action(s)?
   ○ Yes
   ○ No
   ○ I don’t know

* 4. Are you aware of initiatives or documentation developed at EU, national or local level that could be relevant for this action?
   ○ Yes
   ○ No

You have now reached the end of the consultation. We would like to thank you very much for your time and interest.

If you would you like to be kept informed on the developments of these actions and on the activities of the Urban Agenda Partnerships, please click here to subscribe the Urban Agenda newsletter. Thank you!
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UA.communication@ecorys.com