



AGE Platform Europe Policy Statement

Building an age-friendly Europe with the European Pillar of Social Rights

Response of AGE Platform Europe to the Commission's communication COM(2016)127 final: 'Launching a consultation on a European Pillar of Social Rights' and Annex : 'First preliminary outline of a European Pillar of Social Rights'

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AGE Platform Europe

Rue Froissart 111
1040 Bruxelles, Belgium

www.age-platform.eu

Tel: +32 2 280 14 70

E-Mail: info@age-platform.eu

From 1 January 2017:
Avenue de Tervuren 168
1150 Bruxelles, Belgium

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First informal statement by AGE Platform Europe

AGE Platform Europe welcomes the initiative of the European Commission on establishing a European pillar of social rights. AGE will send a full response to the consultation later this year, building on the following key recommendations which will be further discussed and approved at its General Assembly on 16-17 November 2016. Meanwhile, AGE is delivering a preliminary statement with first policy recommendations

Setting the scene

The European Union is at a crucial moment of its history. The crisis triggered almost ten years ago is still going on; many more workers are without jobs, low growth is becoming a long-term scenario. The effects are palpable across all population and age groups: inequalities are rising together with precariousness and under-employment, and politicians at all levels are faced with growing criticism and calls for quick-fix, adequate and sustainable solutions. In this setting, it is important to reverse the course and to pay more attention to social rights than in the past, where the focus has been mainly on economic concerns.

The European Commission's initiative to propose an EU pillar of social rights illustrates that any solution to the current situation must be a common one taken collectively at the European level. As announced by the Commission's President, Jean-Claude Juncker, in the 'letter of intent' that he and his first vice President, Frans Timmermans, sent to the European Parliament President Martin Schulz and Slovak Prime Minister Robert Fico on 14 September 2016, one of the key challenges is '[...] enhancing the capacity of Europe to act as a single and strong player on the global scene...".

AGE therefore welcomes the initiative on social rights put forward by the European Commission. With this proposal, the Commission reconfirms its commitment to the Community method, as stated in the same letter by President Juncker. AGE strongly welcomes and supports such unequivocal attachment to the principles of solidarity and common interest which underpin the European integration. At the same time, we regret that President Juncker, in his State of the Union Address, did not mention social rights, neither specifically referred to the European Pillar of Social Rights, although he had flagged it up in his address last year. AGE urges the European Commission to use all its power and fulfil its initial engagement to propose more 'social Europe' through a comprehensive and ambitious Pillar of social rights.

To face the current challenges, Europe needs to have a coordinated reflection on the impact of demographic change, digitalisation, climate change and migration as well as how to best preserve its social models in ways that works for all citizens, young and old and current and future generations.

Older people are also affected by the crisis: inequalities between older men and older women are increasing with a gender pension gap at almost 40 % and the Ageing Report 2015 projects an increasingly vulnerable situation for older women in the future¹; pension reforms have reduced the real value of current and future pensions, while reforms in the health and long-term care sectors are

¹ 'The [Theoretical Replacement Rate] projections highlight the particular risks from incomplete careers because of a shorter career of just 30 years or due to involuntary early retirement two to five years before the standard pensionable age.' from: European Commission and Social Protection Committee, *Pension Adequacy Report 2015*. p. 261.



leading to more out-of-pocket payments for older people. Investments in health promotion and preventive health care are postponed and healthy life expectancy has reduced already in some countries since 2010, aggravating health inequalities between women and men. While pension reforms have tightened the link between contributions and benefits, and especially in the last years before the legal pension age, only 52 % of people aged 55 to 64 are in employment. Groups such as older Roma and older migrants face aggravated challenges recently highlighted by the United Nations Economic Commission for Europe.²

The rights-based approach proposed by the Commission is appropriate and necessary to real outcomes for the citizens. The EU should make more reference to international rights instruments that already exist to build a comprehensive framework for the respect, protection and promotion of social rights. Real political commitment and visibility are needed for this new initiative to avoid mistakes of the past, such as the lack of progress on Europe 2020 Strategy's targets.

AGE is assessing each of the rights put forward and would like to comment on the following ones, which are fully in line with AGE's priorities to promote an EU for all ages:

Right to long-term care

In the outline of the pillar of social rights the Commission highlights the right to access quality, affordable long-term care services, including home-based care and provided by adequately qualified professionals. It also highlights that the financing of long-term care services shall be strengthened and improved to access adequate care in a financially sustainable way. AGE highly welcomes these provisions, which set out standards for a domain in which the European Union is not active yet, although action is badly needed given the rapid development of the long-term care sector, including profit-making providers, across the EU.

The importance given in the Commission's proposal to long-term care fully reflects the provisions of the Article 25 of the Charter of Fundamental Rights of the European Union, enshrining the right of older persons to live in dignity and independence. It is indeed very difficult for many older people and their families to find care services which provide dignity and independence and are affordable for them. The out-of-pocket costs for long-term care exceed the disposable income of the vast majority of pensioners, not only those on minimum pension schemes. Quality of long-term care is a serious challenge as well, as many care professionals are poorly trained, overloaded with work and structures for the prevention of abuses are not in place.

At the moment, in many member states informal carers are forced to provide care services to their older dependent relatives because there are no long-term care services available – 70% of care work is informal. There is also a growing trend for long-term care providers to target only light to medium needs and reject older people with very severe dependency needs, such as persons with fronto-temporal dementia, because they are considered to be too heavy burden for the limited staff. The duty of care for these heavy cases falls back on the shoulders of families who are neither trained nor supported to provide 24h/365d long-term care to their dependent relative. For many, quality support

² UNECE, 'UNECE calls for active strategies to meet older migrants' economic, social and healthcare needs', 07/09/2016.



services are not present, as highlighted by European Parliament very recently³. Eurofound highlighted that 22% of women and 18% of men care for dependent family members.⁴

AGE recommends:

- to use the European Quality Framework for Long-term Care Services⁵ developed by the WeDO project to create a European framework on the quality of long-term care
- to put more effort in the development of home care, paying due attention to develop care services that cater for all needs including the most complex
- to further push the reflection on how to avoid neglect and abuse in long-term care
- to support palliative care as a form of care that enhance quality of life
- to support informal carers by quality care infrastructure, services and assistance to informal carers, training and skills validation
- to allow informal carers to reduce their working time while continuing to enjoy full social protection rights and remuneration when they care for their family members; to introduce a 'carer's leave directive' to support work-life balance of carers
- to promote the concept of design for all and of age-friendly environments to support independence of people with care needs for as long as possible; to support the European Covenant on Demographic Change to gather regional and local stakeholders around these concepts

Access to the labour market

As stated above, while there is an increased pressure on people to accumulate sufficient years in employment to enjoy a dignified standard of living, only about one in two people between 55 and 64 are in employment. There is also huge gender gap in the employment of older workers, and transitions from unemployment into employment are extremely low.

The Commission's proposal contains many issues that are important for older workers – equal opportunity, active employment support, the right to life-long learning, access to unemployment benefits, secure transitions, strong health and safety. However, the specific challenges of older workers are absent or not spelled out – while, in practice, they are most often forgotten. Negative stereotypes are still fostering discrimination against older workers on the workplace and in hiring. The large restructuring cases in the past years still show that it is most often older workers (meaning workers who still have to work 10 years to secure a full pension) who are made redundant first, as recently shown in Belgium. Older workers are also the ones who take the least part in life-long learning and in-work training. Often, older workers are encouraged to continue working as self-employed, which often means leaving many rights to social protection provisions behind.

³ European Parliament, *Resolution of 13 September 2016 on creating labour market conditions favourable for work-life balance*, 2016/2017(INI)

⁴ Eurofound, *Working and caring: Reconciliation measures in times of demographic change*, 2015.

⁵ WeDO project, *European Quality Framework for Long-term Care Services*

AGE recommends:

- to create a specific employment target for older workers, as was the case in the Lisbon strategy
- to develop guidelines for job search services that take into account the needs of older workers
- to fight stereotypes and discrimination by implementing more adequately the Employment equality directive, and by strengthening the promotion of diversity in the workforce
- to adopt the horizontal equal treatment directive and make funding available to communicate the value of the directive especially in fighting ageism, to further support the paradigm shift towards valuing all ages
- to protect older workers in restructuring cases by intensifying training and placement assistance for those being made redundant regardless of age
- to adapt the workplace to workers of all ages by strengthening the preventive approach in occupational health and safety rules and by including all risks, including psycho-social and emerging risk in occupational health and safety regulations; strengthen the EU-OSHA campaign on healthy workplaces for all ages and exchange practices between member states on how to support the adaptation of workplaces to Europe's ageing workforce
- to specifically focus on older workers in the development and promotion of life-long learning, such as in the EU Skills Agenda; harmonise rules and access to skills validation
- to bring different employment relationships, such as employment and self-employment, closer together in the acquiring of social protection rights and make the statutes more compatible
- to mandate public employment agencies to intervene in the management of the transition from work into retirement; allow for flexible retirement pathways where reduced working hours can be combined with part-time pensions, without losing out on pension rights

Pensions and fight against poverty

The pension systems in several member states were facing considerable challenges to their financial sustainability due to the change in demographics. The Commission stated in the 2015 Ageing Report and Pension Adequacy Report that, by and large, financial sustainability was attained through the past reforms, consisting of lowering pension and indexation levels, increasing retirement ages, tightening the link between contributions and benefits and the promotion of complementary retirement savings.

In view of the growing inequalities, also among pensioners, AGE highlights that only social security pensions have the capacity to prevent old-age poverty and to compensate for discriminations on the labour market and health problems.



The outline of the pillar reaffirms the link that should be made between retirement age and life expectancy. However, in the past, many pension reforms have focussed solely on retirement ages, without creating health and labour market conditions that allow older workers to continue working until the age to qualify for a full pension. The Pension Adequacy Report highlights that challenge of adequacy is far from being lifted. The gender pension gap, already at a high level before the pension reforms, is standing at almost 40 % and will probably increase due to the tightened link between contributions and benefits, as long as women are still fulfilling the care services that the state does not provide.

Minimum income schemes are key to ensure that no-one falls through the nets of social protection. Reference budgets are a useful complement to relative poverty measures, as they assess the needs of people in different household compositions, geographical locations and ages according to the system of in-cash and in-kind benefits in place in many member states and account for reforms that increase the cost of social services.

AGE recommends:

- to pay special attention to safeguarding or restoring the equity function of social security pensions in pension reforms; strengthen gender equality by recommending to create care credits in pension schemes, at the same time as developing quality long-term care services and facilitating work-life balance for carers, as outlined above
- to introduce a link between retirement age and the 'healthy life years' indicator. This would create an additional incentive for member states to invest in preventive health and health promotion, as well as strong occupational health and safety rules.
- to allow workers with disabilities to retire with a disability pension or an equivalent rather than to force them to stay in the labour market and to use up unemployment benefits
- abolish mandatory retirement and allow for more flexibility in the transition from work into retirement, as outlined above
- to table a European Framework Directive on Minimum Income Schemes to create benchmarks based on reference budgets and median equivalised income and which address the challenge of non-take up of minimum income; take into account AGE's recommendations in setting an old-age minimum income⁶

Access to essential services and age friendly environments

Accessibility should mean affordability for people with low incomes, accessibility for people with disabilities and availability for people who need essential services close to their living environment.

The Commission's proposal for a European Accessibility Act is an important step into this direction, which would be even reinforced by the adoption of the horizontal non-discrimination directive, which includes all sectors and services. The concept of age-friendly environments should especially be applied to housing, transport and new technologies.

⁶ European Minimum Income Network, *What should an adequate old-age income entail to life in dignity? Learnings from France, Ireland and Poland.* 2014.





AGE recommends

- to adopt the European Accessibility Act and the horizontal equal treatment directive
- to make housing adaptable to the needs of persons when they acquire disabilities; housing adaptations should be possible at an accessible price to ensure older people can stay at home as long as they wish.



Formal response to the Commission consultation

The following response has been adopted by the AGE General Assembly on 17/11/2016 by unanimity

First part: challenges and issues of EU social and employment policies

1. Most pressing priorities for employment and social policies

- Address structural ageism and stereotypical images of older people in society, which create barriers in accessing social rights.
- Enable adequate financing of social protection by fair taxation policies and apply social impact assessments to the European Semester to protect the most vulnerable
- Ensure pension systems that provide an adequate standard of living without intergenerational and gender biases and keep track with the rise of living costs
- Take older workers into account in job-creation policies
- Labour rules securing workers' interest throughout the life-course, allowing for employee-driven flexibility
- Adapt workplaces to build on the strengths of older employees with their unique experience and potential
- Invest into education to keep older workers connected to changing conditions; improve skills transfers inside and outside companies and among sectors, building on the experience of older workers; Ensure inclusive labour markets for older workers, who wish or need to work for longer
- Support social services, which are a job provider for many people, including older women
- Provide quality and affordable long-term care services.
- Support informal carers through adequate services (i.e. respite care, trainings, etc.) and benefits, including helping those in the labour market combine care and work.
- Promote active ageing – not only from an economic perspective, but also in terms of social participation and citizenship
- Adapt social policies to the context of demographic change and other developments, such as the increasing number of single-parent families and single-person households, including in old age
- Close the gaps in social protection systems to protect everyone, including migrants, self-employed and the most vulnerable older persons i.e. the oldest old among whom mainly women
- Tackle social emergencies linked to migration and promote integration of migrants, which can also contribute to the sustainability of social protection systems

2. How to account for different employment and social situations across Europe?

Each member state has its peculiarities and own ways to adapt to major challenges, but the goals and the path to reach them should be shared. This requires a common high-level political commitment to take necessary action to reach these goals. The Europe 2020 Strategy, while being ambitious, has suffered from a lack of political commitment, of publicity on positive and negative developments and of incentives to work towards the goals of the strategy. It did not play a role in national debates on social policy or social dialogue. Lessons should be learnt from these shortfalls.

The pillar of social rights should set social targets in a consensual manner, involve citizens and local actors and highlight that everyone has something to learn from others. For example, the 'Active Ageing Index' developed by the European Commission and the UN Economic Commission for Europe (UNECE) takes the highest performer in each category as a benchmark, thereby constructing a 'virtual' country with the highest performances, even outperforming the highest-performer. This encourages every member state to look at and learn from others' policies and experiences.

To make the European Semester process more inclusive and more visible, it should slow down to a cycle of 2-3 years, where the progress on past commitments and targets is clearly publicised and debated at national and local level. Indicators in the Semester process should go beyond the labour market and include indicators on poverty, healthy life expectancy, social participation and inequalities (for example the Palma ratio). Reforms should be evaluated on their social and health impact both *ex ante* and *ex post*.

Social partners bear a strong responsibility in implementing the pillar and should be included in the process at all stages, including at national level. Civil society organisations should be consulted as well in the setting up of priorities, policies, and in their implementation.

3. Is the EU 'acquis' up to date and do you see scope for further EU action?

Some important parts of the acquis are not yet implemented or new proposals are pending, such as the horizontal directive on non-discrimination, ensuring an inclusive market of goods and services.

Areas to develop additional legislation are:

- A framework on adequate minimum income across the life cycle, setting quality standards for the provision and take-up of national minimum income schemes combining the use of the relative poverty lines with reference budgets;
- In addition to the Accessibility Act focused on digital infrastructures and services, there is need to further promote and implement age-friendly environments to improve accessibility in broader sense i.e. in built and outdoor environments and the transport sector to ensure that citizens can actively participate in society as long as possible.
- Employment and internal market legislation as well as research funding that protects the health of citizens, enabling them to be healthier and to work for longer: high standards in the fields of health and safety at work, support for adapting workplaces, health promotion and disease prevention initiatives to challenge non communicable diseases;
- An adaptation of labour market legislation to ageing, e.g. by tackling the barriers to employment beyond the retirement age laid down in collective agreements, pension schemes and by the absence of staff insurance coverage beyond pension age;
- An ambitious policy on life-long learning and adapting skills, not only to labour market needs, but to face the transitions of society at any age, including very old age
- The fine-tuning of the EU directives on parental and on maternal leave, and drafting of a directive on paid carer's leave, to ensure no-one needs to interrupt his or her career to face caring responsibilities;
- Develop access targets for long-term care services similar to the Barcelona targets developed; ensure a more vigorous follow-up of these.



4. What trends would you see as most transformative?

X Demographic trends (e.g. ageing, migration)

- Changes in family structures
- New skills requirements

X Technological change

- Increasing global competition
- Participation of women in the labour market
- New ways of work

X Inequalities

- Other

5. What would be the main risks and opportunities linked to social trends that mostly transform societies?

Due to demographic change social and health costs will increase. Other challenges are the changes in family structures and technological change. Investments in human capital of people of all ages are key to keep up with a shrinking population. The question of how to include people of all ages in society is more pressing than ever, otherwise there is a risk of breaching the rights of a growing population.

The opportunity of this trend is that health and technology, as well as social innovations can create a society where knowledge is maintained, people can stay economically and socially active. It also means that women must be valued higher in the labour market. Research shows that more inclusive companies are performing better, which indicates further potential. To increase women's potential, investments in child care, long-term care and services for informal carers are necessary, including leave provisions for informal care duties.

Fast technological change may leave older people behind – both because ICTs are not all designed in an inclusive manner, and because older workers are often seen as out of touch with technological developments, creating discrimination in the labour market and on the workplace. New technologies are also quite expensive for older people with low income. To counter the resulting risk of exclusion of an increasingly large population group, accessibility requirements in the field of ICT, transport and built environments should be set by EU law and older people should be included in the development of products and services.

Migration has always shaped European societies; Europe should build on its experience to avoid repeating mistakes from the past. Current trends lead to the presence of more older people with a migrant background who face specific challenges in terms of adequate standards of living in old age, inclusion in life-long learning and social services. Durable solutions to the challenge of integration must include their needs as well.

6. Which policies, institutions or company practices would be recommendable as references?

Ageism and negative stereotypes are important barriers to fulfilling the potential of older people in society. These should be combated by legislation, but it is more important to tackle stereotypes





themselves by promoting positive images in the media and official communications. All policies should therefore take a human rights based approach.

The Active Ageing Index can be used to access untapped potentials among older people, monitor overall progress, and identify where challenges remain. It can be used to benchmark member states' performances in a way that avoids that high performers get the impression that they have nothing to do, while indicating the domains in which a country can still improve.

The Nordic welfare systems can serve as examples on how to foster the inclusion of women and older workers in the labour market, with low levels of social exclusion. However, every member state is different and this should be accounted for. Some member states face financial constraints that hinder them to implement ambitious social policies their ageing populations need. Adequate social protection should be remain a key EU objective and should be protected from austerity cuts.

Flexible working hours and employee-driven part-time work are important for creating a life-cycle approach to employment, helping them to manage work, care and family lives.

New ways of work have to be thoroughly tested both on their technical and ethical potential and risks, especially in projecting their long-term impact on social security systems and individual biographies.

The design-for-all principle is a promising framework to steer technological change in a socially inclusive manner. This is especially relevant for the implementation of right 20, but should be streamlined. The adoption of the horizontal equal treatment directive and the Accessibility Act would create a powerful framework for this.

7. Do you agree with the presented approach for a EU pillar of social rights?

I strongly agree

I agree

I disagree

I strongly disagree

Comments:

We agree in principle with the approach presented to create European rights in social policies. However, it does neither specify who the rights-holders are, in which way these rights are implemented and enforced, nor how they are monitored.

Many attempts have been made at EU level to coordinate social policies in order to reach common objectives. If a rights-based approach is to be implemented, this should also follow the approach that has already been used across the world, such as under the European Charter of Social Rights or the UN system of human-rights treaty bodies. These are articulated around protecting rights, respecting rights and promoting rights through indicators and monitoring, establishing action plans and checking if there is progress towards agreed benchmarks.

The European Commission's seems to embrace only the third part, via benchmarks and peer-review. However, the first two principles are essential and should also be included in the EU approach. It





should lead to an upward convergence of social protection systems without requiring standardisation.

The European debate should be linked to existing international standards: the UN ICESCR, the European Social Charter as well as the ILO core conventions, including the ILO Recommendation on Social Protection Floors. These instruments should complement and support each other.

The current focus on the Economic and Monetary Union bears the risk of leaving non-Eurozone member states behind. If applied to all member states, the proposed framework would help prevent social dumping and ensure a fairer implementation of the EU fundamental principle of free movement of citizens.

Attention has to be paid to implicit age limits that are formulated as parts of the rights. For example, the rights to access the labour market may have mainly people of working age in mind, while increasingly people who have reached legal retirement age need or wish to continue working or return to work.

	I strongly agree	I agree	I disagree	I strongly disagree
1. Skills, education and life-long learning	X			
2. Flexible and secure labour contracts		X		
3. Secure professional transitions		X		
4. Active support for employment		X		
5. Gender equality and work-life balance	X			
6. Equal opportunities	X			
7. Conditions of employment	X			
8. Wages		X		
9. Health and safety at work	X			
10. Social dialogue and involvement of workers		X		
11. Integrated social benefits and services	X			
12. Health care and sickness benefits	X			
13. Pensions	X			





14. Unemployment benefits	X			
15. Minimum income		X		
16. Disability benefits	X			
17. Long-term care	X			
18. Childcare		X		
19. Housing		X		
20. Access to essential services		X		

8. Are there aspects which are not adequately expressed or covered so far?

While the Commission insists on inequalities as the justification for the introduction of the pillar of social rights, the rights outlined do little to assess their effectiveness in terms of reducing inequalities. Adequate financing of social protection can be made possible if member states agreed on common principles for fair taxation, including on fiscal rules on pension savings plans, and if the Commission uses all available flexibility to exempt social investments from the deficit calculations under the Stability and Growth pact.

In the light of Euroscepticism, the pillar should be implemented gradually and in a very inclusive manner. More should be done to make the initiative known among citizens, including to older people. It should be seriously implemented and not undermined by restrictive fiscal policies.

There is an issue with the presence of the principle of non-discrimination as only one separated right (access to the labour market), while it should be mainstreamed into the implementation of all rights, including the rights that are not related to the labour market. The principle of non-discrimination should be stated as an overarching one and not as a separate right, and take into account the intersection of inequalities and multiple discriminations, such as of older women or older persons with disabilities.

The right to life-long learning is only expressed through the lens of access to the labour market, while it should be possible to everyone, at every age, to fulfil her or his right to education and life-long learning. To make it really life-long, it should be expressed as a right for those in work, looking for work, and not able to work, regardless of their age.

Large parts of the population who cannot work are not linked to the pillar: nothing is said about social participation of younger and of very old people, nor of the situation of migrants who are not allowed to access the labour market or for whom barriers of access are very high.

9. What domains and principles would be most important as part of a renewed convergence for the euro area?

1. Skills, education and life-long learning
2. Flexible and secure labour contracts
3. Secure professional transitions





4. Active support for employment

X **5. Gender equality and work-life balance**

X **6. Equal opportunities**

7. Conditions of employment

8. Wages

9. Health and safety at work

10. Social dialogue and involvement of workers

11. Integrated social benefits and services

12. Health care and sickness benefits

X **13. Pensions**

14. Unemployment benefits

X **15. Minimum income**

16. Disability benefits

X **17. Long-term care**

18. Childcare

19. Housing

20. Access to essential services

Comments

Although the European economy as a whole continues to show signs of moderate recovery there are also signs of serious erosion of living standards of a large proportion of people in the EU who struggle daily to make ends meet as governments continue to implement austerity measures. The adverse situation of many people in economically negatively affected countries should be of especially great concern. The erosion of living standards and the reduction of public services cannot be ignored as this would be counter-productive and produce a situation of bitterness and disappointment in large sections of the EU population.

It is often portrayed that older people have been rather saved from the crisis, as older people's employment rises and poverty rates have not risen. However, this hides that income levels have fallen, and therefore the poverty threshold as well. Goods and services have become more expensive, especially where they were publicly provided and financed: in health care, long-term care, mobility and other essential services. These changes hit older people and especially older women, who are more dependent on health and long-term care services and who often feel more socially isolated and excluded.

For the 'EU pillar of social rights' exercise to succeed, it is important that it truly leads to upwards, convergence and not to a further dilution of social protection systems. The gaps in standard of living should be addressed, not only by benchmarks, but also by allowing funding for bridging these gaps. The availability of European solidarity funds should be considered to provide such funding.

Age discrimination as a primary concern of AGE members should be addressed more comprehensively: it is implicit in public policies, such as excluding non-working age population from certain services or benefits, in companies' hiring and promotion practices and in society in forms of stereotypes. Senior citizens should rather be seen as a resource for European societies.





10. How should these be expressed and made operational? In particular, do you see the scope and the added value of minimum standards or reference benchmarks in certain areas, and if so, which ones?

Making the social pillar operational requires strong public communication and visibility. Just annexing benchmarks to existing documents in processes such as in the European Semester would not create sufficient visibility and would limit its impact. An annual European Council could for instance focus on the situation of social rights in Member States.

On a more technical level the principles should be supported by adequate funding and not counterbalanced by contradicting policies. Any principle in the pillar of social rights must therefore be echoed in the European Semester. Indicators should be clear, the same for all member states (i.e. not the same as the EU2020 poverty target, measured differently across member states), and there should be action attached to progress or regress towards the benchmark.

To safeguard social protection, a 'golden rule on social protection' or on social investment, earmarking a certain percentage of government spending and/or of GDP, could be established within the rules of economic and fiscal governance of the European Union and the Eurozone. This could safeguard sufficient financing for the minimum standards set out in the pillar.

Finally, it is important to include service users and benefit recipients in the design and delivery of policies at all levels, especially at local level. Participation of senior citizens in the design of long-term and integrated care, pension policies, job-search assistance, design of products and services for the 'Silver Economy', the creation of reference budgets to benchmark minimum income schemes, in adapting workplaces and designing life-long learning offers and in fighting age stereotypes themselves are the best way to ensure that policies are effective in matching their needs and demands. This is why civil dialogue, especially intergenerational dialogue, should have a strong role similar to social dialogue.





Second part: Outline of the draft pillar of social rights

Chapter I: Equal Opportunities and Access to the Labour Market

1. Skills and life-long learning: adequate level of basic skills and key competences

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	X			
Is the principle addressing those challenges in the right way?		X		
Should the EU act to put in reality this principle?	X			

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

It is very positive that the right is included and comes on top of the list; however it is problematic that it is framed in the chapter of 'rights to work'. It should be derived from the right to education, which applies to all age groups. It should not only be 'low-skilled young people and working age adults' who should be 'encouraged to up-grade their skills', but people generally. This could be rephrased: 'Especially low-skilled young people and working age adults shall be encouraged to up-grade their skills, while education and training should be available to all'.

The Nordic Council of Minister's discussion on introducing a right to education for over-60-year olds should also be discussed in the European context.

The paragraph stays silent on skills validation and certification, a cornerstone of transforming skills acquired through non-formal and informal learning into assets in the labour market. This should be included under the right to education as well, just as the necessity to improve and upgrade the skills of migrants to allow for a swift integration into society.





2. Equal treatment regardless of **employment contract**, flexibility for employers

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?		X		
Is the principle addressing those challenges in the right way?		X		
Should the EU act to put in reality this principle?		X		

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

It is important to safeguard non-standard employment contracts from abuse by not only preventing them, but by establishing incentives for employers to transition contracts to open-ended standard contracts. Employers should account for the share of non-standard vs standard employment contracts in their organisation.

Article (b) of the right looks like an employer's right rather than an employee's right, which turns the 'rights to access the labour market' upside-down. Flexibility should be one that the employee can use to provide for changes in personal situations.

The article does not emphasise the security counterpart of flexible contracts: it could, for example, refer to income and employment security for lower-hour arrangements in cases of sudden fall of output in industries (the German 'Kurzarbeit' principle). Social dialogue should be the driving force for such arrangements.

Employee-driven flexibility needed in the transition into retirement. Rather than going from 100% to 0% immediately, many older workers could work for longer if they were allowed to reduce their working time, combining this with pensions. The ongoing reflection on this issue by Eurofound is very positive and should be continued.

Many older workers are encouraged to shift from full-time employment to part-time auto-entrepreneurial consultant statuses, often losing out already acquired pension rights or rights to health insurance. This should be avoided, either to allow for part-time employment that can be combined with part-time pensions or by strengthening social protection for self-employed.





3. Secure transitions: individualised job-search assistance; Preservation of social and training entitlements

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	X			
Is the principle addressing those challenges in the right way?		X		
Should the EU act to put in reality this principle?	X			

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

The reference to working age should be deleted; all persons should have access to individualised job-search assistance. It should also be specified that job-search assistance can be useful to persons who are already in a working relationship – this might help them to change, to escape precarious working conditions, or to build a career that increases their skills by collecting experiences/trainings. Subsection (b) on preservation and portability of training entitlements is very positive. EU action would be especially necessary to safeguard the portability of training entitlements in case of intra-EU mobility. The same holds true for social entitlements, as already outlined for the paragraph on employment contracts.

A transition not mentioned is the one from working to retirement: this is a transition that needs to be prepared as well, as many people are unprepared for this. The EU and member states should encourage measures to keep links between employers and their retirees, also giving them the possibility to come back in times of need for their specialised skills, such as to train younger employees. The option of transitioning progressively into retirement should be explored as well.

The issue of re-entering the labour market after periods of care or other career interruptions should be better taken into account. Specialised reintegration in such cases should be offered by public employment services, and an assessment and validation of people’s skills should take place after these periods.





4. Active support to employment: individual assessments and service offer for long-term unemployed within 18 months and youth guarantee

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	X			
Is the principle addressing those challenges in the right way?		X		
Should the EU act to put in reality this principle?	X			

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

It is positive that the Commission wants to stir action in this domain. It should be further emphasised that an individualised assessment and guidance should ideally take place in the first month of unemployment, rather than after 18 months maximum, especially when the unemployed person belongs to a category specifically at risk of long-term unemployment because of age or the personal situation (long, low-skilled work experience before, experience from a sector in decline, return from career interruptions due to health or family reasons, etc.). In some member states, unemployed have to 'sit out' the period of one year of unemployment before being allowed to take up studies or other forms of training on their own initiative. Situations like these should be avoided to allow for positive transitions between jobs as well as from one career to another, in a life-cycle view.

AGE's position on the long-term unemployment recommendation can serve as a guideline:
http://www.age-platform.eu/images/stories/Publications/papers/2015_AGE_Position_long-term_unemployment.pdf





5. Gender equality and work-life balance: equal treatment in pay, segregation; access to adequate leave arrangements for people with caring responsibilities; flexible working arrangements

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?		X		
Is the principle addressing those challenges in the right way?		X		
Should the EU act to put in reality this principle?	X			

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

Paragraph (a): Equal treatment is a fundamental principle that has its full place in this list of rights, however not only in the access to employment – non-discrimination should be stated as a general principle in accessing all rights outlined in the pillar

Paragraph (b): it is important to include people with caring responsibilities in the formulation of the right. Remunerated leave should be available not only to parents, but should be transferrable to grandparents and people with caring responsibilities as well. However, leave in itself is not sufficient, there needs to be more investment into quality care services, as referred to in the section on long-term care. These include services that support informal carers in balancing paid employment and unpaid care work. Please see AGE’s response to the consultation on work-life balance and the attached policy paper: <http://www.age-platform.eu/images/stories/Publications/papers/Carers leave and reconciling work and family life AGE paper Feb2016.pdf>.

The leave arrangements for fathers and mothers should be rebalanced to support a more equal uptake of care responsibilities, which supports women’s employment and the chances of couples to have another child. Working grandparents can also play a role in enhancing work-life balance of parents and should be regarded in leave policies. It is crucial to support especially small and medium-sized companies in the implementation of care leave arrangements.

Paragraph (c): Flexible working arrangements are important for workers with children and/or caring responsibilities, as it is important to take into account workers’ and employers’ needs. The article should also point to the role of the state in providing social protection for the time not spent in work in terms of providing income security, continued accrual of pension rights and preservation of rights to health and unemployment benefits.





6. Equal opportunities: enhance labour market participation of under-represented groups, equal treatment, raise awareness

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	X			
Is the principle addressing those challenges in the right way?		X		
Should the EU act to put in reality this principle?	X			

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

Non-discrimination is a fundamental principle of EU primary and secondary law. In the scope of the pillar of social rights, it should stand out in the beginning and be applied as a principle to the implementation of all the rights, including in the rights to access social protection. It is important in the field of access to the labour market, but important areas of discrimination remain in other domains as well. The Horizontal non-discrimination directive is a cornerstone of new legislation that should be enacted. Special attention should also be paid to the application of existing non-discrimination legislation.

The article rightly points out the necessity to increase labour market representation of under-represented groups. The preamble seems to suggest that this article is primarily against discrimination based on race or ethnic origin; age discrimination and discrimination against persons with disabilities is however present and employment rates of older workers are significantly lower than for the general population, showing a very high gender gap in employment rates at this age. It should be further highlighted that this article is for all grounds of discrimination, including age and disability. Non-employment related matters such as the representation of older people in the media play a vital role in combatting discrimination and should also be included in the implementation of this right. The role of older people, their contribution and potential should be further highlighted to improve their access to social rights.

For further assessment of structural discrimination on the grounds of age, see AGE’s policy paper on structural ageism: http://www.age-platform.eu/images/stories/Publications/papers/AGE_IntergenerationalSolidarity_Position_on_Structural_Ageism.pdf





Chapter II: Fair working conditions

- 7. Employment conditions** (rights and obligations in employment relation, work contract, probation period of reasonable duration, motivated dismissals and notice period; compensation in case of dismissal and access to rapid and effective appeal and dispute resolution)

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	X			
Is the principle addressing those challenges in the right way?		X		
Should the EU act to put in reality this principle?		X		

- 8. Fair remuneration**, enabling to a decent standard of living

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?		X		
Is the principle addressing those challenges in the right way?		X		
Should the EU act to put in reality this principle?		X		





9. Health and safety at work: adequate level of protection from all risks

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	X			
Is the principle addressing those challenges in the right way?		X		
Should the EU act to put in reality this principle?	X			

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

This article is important for active ageing as it is promoted by the EU and member states. Effective health and safety measures maintain employability and health throughout the life-cycle and should not be limited to older workers; it should be however clearer that this includes awareness-raising about and tackling of new and emerging risks, such as psycho-social risks. Awareness-raising campaigns, such as the ones promoted by EU-OSHA, are important to reach out to employers, but this should not divert from the need of strong EU-level legislation on occupational health and safety, which is supportive of a preventive and life-cycle approach.

Specific support for small and medium-sized companies is needed to help them be up to the standards of legislation.

Reintegration and rehabilitation does also include workplace adaptations in line with the health needs and capacities of workers. Public authorities should provide guidance such as the one offered by the Belgian former ‘Professional Experience Fund’, which allowed employers to apply for funds to finance ageing-related workplace adaptation. The coupled period of consultation allowed to make work sustainable even without spending money on the projects.





10. Social dialogue and involvement of workers

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	X			
Is the principle addressing those challenges in the right way?		X		
Should the EU act to put in reality this principle?	X			

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

Social dialogue is an important pillar of social and industrial relations, and should be strengthened, including at the EU level. The implementation of the pillar and other social policies needs to be financed, and reaching an agreement between social partners is instrumental to the sustainability of these policies. The strengthening of the organisation of trade unions in digital jobs and jobs organised in the form of bogus self-employment is crucial to build sustainable labour markets for the future.

The principle of civil dialogue is however absent from this principle: civil society organisations representing important groups, which are not necessarily organised in the form of trade unions, have important contributions to make in the implementation and design of social policies: this is the case for disability or patients' organisations, organisations of carers and people experiencing poverty, including homelessness, organisations representing older people and those representing the social economy. Civil dialogue should therefore also be a principle of the proposed pillar.





Chapter III: Adequate and Sustainable Social Protection

11. Integration of services

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	X			
Is the principle addressing those challenges in the right way?		X		
Should the EU act to put in reality this principle?	X			

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

This right is truly innovative, as the integration and dynamics between social benefits and social services, including health care services, as well as between different services, are key in ensuring adequate social protection. This includes paying attention to effective service provision and affordability where competences for certain social services are decentralised to the local level. In the implementation of the right, much attention has to be paid to local and regional authorities who are coordinating these services.

An additional concern is that integration of benefits and services and between services should work to the advantage of the user. Making, for example, access to child or long-term care services conditional upon active job search may not reach the goal pursued, as care responsibilities might not be the only obstacle faced by job-seekers. Integration of services means to put the citizen first and to build an individualised support system around her or him; such integration is not only advisable but also indispensable when it comes to ensuring good quality service provision, such as quality long-term health and social care.

Changes in support systems can be very confusing, especially for older citizens. It is important that there is very clear information about what is available and which agency is in charge of providing it. The creation of ombudsperson services should also be a key part of this.

Information in an accessible format and understandable language is key in the integration and reorganisation of services. It is essential to develop one-stop-shops that offer a single point of information and application to the benefits and services that the individual is entitled to (ranging from health, unemployment and family to housing), however this should be implemented maintaining quick and clear procedures, rather than adding an additional layer of bureaucracy.





12. Health: timely access to good quality preventive and curative health care, cost-effective provision, sick leave, return to work

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	X			
Is the principle addressing those challenges in the right way?		X		
Should the EU act to put in reality this principle?	X			

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

Paragraph (a): it is very positive to outline the access to preventive health care alongside curative health care; as well as the importance of affordability and resilience of healthcare systems. The EU has a role to play in better promoting research funding programmes dedicated to health promotion and health inequalities (H2020), including to enhance evaluation and monitoring. A strengthening of partnership with the WHO would also help to support in a meaningful way exchange of good practices across the EU. To take one example: mental health is a key issue that need better attention at EU level notably when it comes to working longer but also to tackle social isolation of older people and its consequences. Last but not least, health issues should be streamlined across EU policies, through the ‘health in all policies’ approach and notably by developing a true health impact assessment of EU initiatives, such as in the agriculture, transport or taxation areas.

Paragraph (b): the argument of cost-effectiveness has often been used to reduce the provision of medical services. There should be no reduction in universal access to health care alongside an increased focus on preventive health, health promotion and disease prevention, as healthy ageing starts at birth. Better would be to monitor the outcomes of the health care system and other policies on health which requires to break the silos in the way public budget are managed. The inclusion of the healthy life years indicator in the European Semester could favour this on EU level.

Paragraph (c): It is important to mainstream social protection for the self-employed, therefore it is important that the reference to self-employed is part of the pillar, but it should be generalised to other rights (and corresponding duties) as well. Reintegration and rehabilitation should be promoted, to maintain links with the labour market and social inclusion in situations of recovery of life with long-term conditions.





13. Pensions: decent standard of living, reduce gender pension gap, care credits; sustainability and future adequacy, link of retirement age to life expectancy, increase effective retirement age

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	X			
Is the principle addressing those challenges in the right way?		X		
Should the EU act to put in reality this principle?	X			

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

(a): Ensuring a decent standard of living is important and this underlines the importance of looking at pension adequacy alongside sustainability. The reduction of the gender pension gap is also an important goal, and care credits are a right way to achieve this. Solutions should be found where pension entitlements derive more from complementary pension schemes than from statutory public pensions. The same comments on self-employed apply as for right 12 on health. It should be added that minimum pensions should be adequate to lead a life in dignity, including in case of long-term care and health care needs. Indexation of pensions in line with wage and price growth should be mentioned to prevent pension devaluation over time. In fiscal tightening or restructuring processes, pensions should be safeguarded. It is very difficult for low-income pensioners to adapt to the changes of pension benefits, as it has been shown in countries under adjustment programmes. Current pensions should therefore not be reduced. To encourage personal pension savings, favourable tax treatments should be found, without compromising the effectiveness of public pensions.

(b): Linking life expectancy and pension age is important, but it oversees negative the developments of healthy life years. HLY provide guidance for fixing pension age without risking increasing sick leaves or inactivity. Solutions should exist for persons and professions in unsustainable employment that cannot be continued until retirement age. The link with old-age labour markets is missing; functioning labour markets are a precondition for higher retirement ages to work as planned. The right should also entail the possibility of retirees to continue work or to start working again without the full loss of his/her pension.

Further proposals by AGE, e.g. on the decumulation phase of funded pensions, are in annex to the 2015 Pension Adequacy Report or on AGE's website: <http://bit.ly/2eFruug>





14. Unemployment benefits: requirement for active job search combined with adequate benefits

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	X			
Is the principle addressing those challenges in the right way?			X	
Should the EU act to put in reality this principle?	X			

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

It is odd to formulate the right by first pointing to the conditionality of effective job search. Unemployment benefits are an important safeguard against poverty and downwards social mobility and the right to unemployment benefits after a certain period of work should be put up front – of course, linked to certain positive requirements. The right should also be extended to young people leaving education and/or internship periods that did not allow for acquiring social security rights. Periods with unemployment benefits should account for accrual of pension rights to ensure adequacy of future pensions, as people with scattered work biographies are most at risk of old-age poverty.

The combination with active labour market policy, such as job search assistance, adult education, vocational training etc. should be mentioned as an addition to the right to unemployment benefits. It should also be emphasised that training can be a substitute for job search, as it builds human capital and increases the chances of finding a sustainable job afterwards. In some member states, it is not per se possible to follow training right after registering as an unemployed – the combination of unemployment benefits and training is possible there only after one year of unemployment. This creates a false incentive for ‘sitting out’ the first period of unemployment benefits and counteracts the idea to reduce skills mismatches.

It should be ensured that unemployment benefits do not provide incentives for employers to rely on substandard or precarious employment, for example by monitoring the staff turnover in companies with many short-term and other non-standard or subsidised contracts.

It should be ensured that people who receive unemployment benefits are however able to work and are in a positive process of job-search and/or training. Abuses such as combining unemployment benefits with informal jobs should be combated.





15. Adequate minimum income; with requirement to participate in active labour market policies

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	X			
Is the principle addressing those challenges in the right way?		X		
Should the EU act to put in reality this principle?	X			

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

There is a legal basis for a European framework directive on minimum income, which could create a framework for setting national adequate minimum incomes and put into practice this right.

The right to adequate minimum income should define what adequacy means. A European method to define national goods baskets and reference budgets would be helpful in this sense, as in some member states the common benchmark of 60% of median income does not cover basic needs. Adequate minimum income should be at least fixed at this threshold, with possibilities for an increase according to reference budgets. Reference budgets should be defined not only for one type of household and situation, but should include different household compositions in terms of numbers of children and adults, and according to their age and geographical location. The link to job search is problematic as some minimum income recipients are unable to work for health and other reasons. This should be rephrased as 'For those who are able to work, these benefits shall include services and counselling to actively support labour market (re)integration.'

For older people in particular, the question of revision and indexation of minimum pensions is crucial, as living costs tend to increase at the end of life. The adequacy of old-age income is mentioned in the Commission's situation analysis, but not precisely in the formulation of the right. It should be highlighted that this right applies to people of all ages. AGE has created a brochure on what adequate minimum income in old age should entail: http://www.age-platform.eu/images/stories/Publications/AGE_EMIN_publication_Dec2014_EN.pdf





16. Disability: enabling services and basic income security, compatibility of benefits with employment

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	X			
Is the principle addressing those challenges in the right way?		X		
Should the EU act to put in reality this principle?	X			

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

The term of ‘basic income security’ marks a problematic difference with the wording of ‘adequate income’ concerning other rights. It is important to be able to combine disability benefits and employment to avoid disincentives to work, as well as with pensions, as disability often generates costs and needs for services that go beyond the value of pension entitlements. The inclusion of enabling services is important, but should be outlined that this means quality, affordability and accessible services.

Enabling services should be accompanied by enabling environments that will lower the need for specific support and enhance autonomy and independence. Enabling services should also not be necessarily coupled with conditions to enter the first labour market. Support should be provided to employers to enable them to employ persons with disabilities, including through reasonable accommodation.

The EU has a role in setting non-discrimination legislation and in implementing the UN CRPD. The funding of services and innovations for social participation of persons with disabilities via structural and social funds is important.

In some cases, adults who are faced with impairments for the first time when they reach old age are no considered as people with disabilities. Across the EU, we come across laws and policies that enshrine differential treatment for older people imposing age limits in access to benefits, (BE and EL), mobility allowances (IE) or personal assistance (SK). But also people with disabilities in younger ages are sometimes not considered the same way as they age and may face a reduction of the benefits and services which were available to them. The EU should monitor these cases and encourage member states to fully comply with the non-discrimination principles in the EU treaties and to apply these principles to the provision of social services.

AGE’s position is summarised in its input to the Council of Europe’s Disability Strategy:

<http://bit.ly/2dWL57W>





17. Long-term care: access to quality and affordable long-term care services, provision and financing

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	X			
Is the principle addressing those challenges in the right way?		X		
Should the EU act to put in reality this principle?	X			

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

The right to LTC is a key part of the pillar. Demographics and stagnating health outcomes show that needs will rise, while art. 25 of the EU Charter of fundamental rights enshrines the right of older persons to live independently and in dignity. The UN Independent expert on the autonomy of older persons stressed that a human-rights based approach to care is needed.

Affordable, available and accessible long-term care services that include the community are important to achieve gender equality, as the majority of care is provided informally and by women who lose out on social protection while caring. Our comments on right 5 refer to the need for services to support informal carers.

AGE has developed an EU quality framework for long-term care services as part of the WeDO project, a starting point for further quality initiatives on care in the EU: bit.ly/2eYsNAM. It is especially important that the prevention of abuse and neglect is part of all provisions concerning LTC, formal or informal.

An EU policy on long-term care should build on the conclusions of the 2015 SPC report and include all forms of care, including prevention, promotion, rehabilitation, long-term and palliative care, social care and community services. The promotion of palliative care in all settings can improve the quality of life of care recipients. The PACE project that provides recommendations on this issue:

www.eupace.eu

To ensure sustainability of LTC systems, an investment initiative is needed to develop skills and services. The Life Long Living model from Fredericia (DK) shows that integration of health and social care services at home and the accent on rehabilitation that quality of life and efficiency can be achieved at the same time without higher costs. More information on integrated care in Europe has been collected by the SUSTAIN project: www.sustain-eu.org





Age-friendly environments as promoted by the WHO and enabling services have a great potential to reduce needs for care services.

18. Childcare

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	X			
Is the principle addressing those challenges in the right way?		X		
Should the EU act to put in reality this principle?	X			

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

Without having the competence to comment on the wording of the right to child care, AGE fully supports the inclusion of childcare as a European social right. Availability, quality and accessibility of childcare facilities are crucial to ensure an equal start into life for children and employability and gender equality for parents throughout the life-course.

19. Housing

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	X			
Is the principle addressing those challenges in the right way?		X		
Should the EU act to put in reality this principle?	X			

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

AGE supports the inclusion of housing as an essential social service in the pillar. Accessible buildings and apartments should be promoted in all EU housing policies. Additionally, it should be emphasised that a large share of social and subsidised housing should be accessible for persons with disabilities





and adequate for older people with functional limitations to ensure they can benefit from the provision of these services and benefits. The EU could for example facilitate the development of standards for accessible housing and ensure adequate funding support through existing programmes. In this area the technological change can help to provide with solutions that would allow more flexibility in managing the housing stock.

Alternative housing solutions can also be supported in order to promote for example intergenerational living solutions

Housing should be designed so that it can be adapted to the needs of persons when they contract disabilities. A good example can be quoted from Spain. In Catalonia the law on minimum housing standards includes dimensions that, beyond obliging that all common spaces shall be accessible, guarantee that in case of a need for housing adaptation this will not cost more than 6.000€.

20. Access to essential services (electronic communication, banking, energy, transport, ...)

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	X			
Is the principle addressing those challenges in the right way?		X		
Should the EU act to put in reality this principle?	X			

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

The consideration of access to essential services is a truly innovative part of the pillar which should be supported. The best way to ensure this is the adoption of the horizontal non-discrimination directive, which includes all sectors and services, alongside the adoption of the Accessibility Act. The Act could even be strengthened, for example, by including buildings around the services into the scope of the Act. The pillar of social rights should, in addition to this legal framework, monitor the implementation of equal access to essential services and develop guidelines for implementation, including for people experiencing poverty and social exclusion.

The services listed should not only be accessible, but also affordable and available, including in remote and sparsely populated area.

Accessibility is key for persons with disabilities, but also essential for older people, notably those with functional limitations. The Covenant on Demographic Change brings together local and regional stakeholders to build age-friendly environments, through initiatives that go beyond the built environment and includes the access to goods and services. The EU should support this initiative.





While new technologies can offer alternative solutions, for example to provide access to public services in remote areas, a balance should be found to avoid further digital exclusion. For instance, the right to choose to receive information on paper rather than only digitally is essential, as are courses and trainings for those who are still less familiar with electronic devices. Since digital illiteracy also creates additional obstacles in the access to essential services. EU funds can play a role in fostering the development and innovation of adult learning programmes, which have the potential to reduce the gaps of digital and non-digital illiteracy. The principle of being able to manage public and private services and benefits offline should always be respected.

