Response to 'How to Use the Open Method of Coordination to Deliver Policy Progress at European Level : The Example of Homelessness'

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Introduction

Freek Spinnewijn's paper 'How to Use the Open Method of Coordination to Deliver Policy Progress at European Level : The Example of Homelessness' (hereafter referred to as 'the article') is a stimulating and timely, if controversial, critique of the European Union's Open Method of Coordination on Poverty and Social Exclusion (Social OMC). I share several of his criticisms of the failure of the OMC to have as much impact as many of us hoped, if not always his reasons for this, and some of his suggestions in relation to the future are also helpful. However, the article seems to be based on a rather idiosyncratic interpretation of the origins and purpose of the OMC and a certain amount of wishful thinking that it should have been something different from what it was precisely intended to be. This leads to some exaggerated criticisms of several aspects of the process. However, Spinnewijn states that his paper 'seeks to provoke and raise debate, and should be read in this context'. My response should also be read in this context.

The OMC as Part of the Lisbon Strategy

Launched in 2000, the Social OMC was never designed to be a narrowly focused strategy addressing only a few 'extreme' aspects of poverty and social exclusion such as homelessness. It was developed in the context of the Lisbon Strategy's overarching objective of achieving sustained economic and employment growth and greater social cohesion. At the heart of this formulation was the recognition of the interdependence and mutually reinforcing nature of economic, employment and

social policy – what became known as the Lisbon policy triangle. The Social OMC was established in recognition that social cohesion could not be achieved without addressing the continuing scandal of high levels of poverty and social exclusion across the EU. It was intended as a means of spreading good practices and achieving greater convergence towards policy objectives agreed by the EU as a whole as well as helping Member States to develop their own policies. A strategic goal agreed by Member States was to 'make a decisive impact on the eradication of poverty by 2010'. Even though this goal included, of course, addressing aspects of extreme poverty such as homelessness, it was clearly intended to be much broader and more ambitious than just that. Thus, when the article criticises the European Commission for trying to use the Social OMC for 'the establishment of a strong and ambitious social pillar in the EU structure' and blames this for complicating FEANTSA's relations with the Commission, it is in fact blaming the Commission for trying to do exactly what was intended by the Lisbon European Council.

Universal Versus Targeted Approaches

The article also criticises the European Commission for taking an ideologically driven universal approach to poverty and social exclusion and seems to imply that this somehow rules out some element of a more targeted approach. This I would suggest is not necessarily the case. First, there is a very good reason for encouraging universal policies which ensure access to opportunities and services for all. The evidence tends to show that the countries with the more universal approaches tend to be the most successful in both preventing and reducing poverty and social exclusion (see, for instance, Frazer and Marlier, 2007, p.6). Second, universal and targeted approaches are not mutually exclusive. Indeed, it is striking that the Commission realised this from the outset of the Social OMC. The first *Joint Report on Social Inclusion* (2002) recognised the need for a combination of universal and more targeted policies. In this regard it identified three types of policy approaches:

- Universality : ensuring increased levels of adequacy, access and affordability of mainline policies and provisions with the view to improving their coverage, uptake and effectiveness.

- A level playing field : addressing specific disadvantages that can be overcome by the use of appropriate policy (e.g. lack of skills).

- Solidarity for human dignity : compensating for disadvantages that can only be partially (or not at all) overcome (e.g. disabilities).

In my view a combination of all three approaches is necessary to ensure effective social inclusion policies that both prevent and reduce poverty and social exclusion.

I would thus be concerned by the implication of the article that strengthening the Social OMC is somehow a distraction from tackling (extreme) poverty in general and homelessness in particular. It is worrying if FEANSTA sees efforts to tackle housing exclusion and homelessness as somehow separate from the wider struggle against poverty and social exclusion. Surely both can and should reinforce each other.

Limited EU Competence in the Social Field

The article also criticises the Commission's approach as being unrealistic because the EU has little competence in the area of social policy. It is of course, in part, true that the Commission has limited competence in the area of social policy. However, it was undoubtedly a step forward for the Member States to agree common social objectives in 2000 and to establish the Social OMC, even if the main competence for delivering on agreed objectives remains almost exclusively at country (national and sub-national) level. Also, the Commission's approach at least created some space for addressing poverty and social exclusion issues that might not otherwise have been on the EU social agenda. This has meant that organisations like FEANTSA have had opportunities to raise issues such as housing exclusion and homelessness and to receive significant funding to help them to do so. This might not otherwise have been the case as these issues were even less an area of EU action. Indeed, the Commission, contrary to what the article suggests, has adopted a quite pragmatic approach within an overall fairly comprehensive approach to issues of poverty and social exclusion. From the very first Joint Report in 2002 core social inclusion issues were identified around which work could be built. These included 'Ensuring good accommodation for all' within which 'developing integrated responses both to prevent and address homelessness is another essential challenge for some countries'. This focus on key issues has led to increasingly effective and useful initiatives in areas such as child poverty, active inclusion and, now, on housing exclusion and homelessness. Of course, this does not mean that there are not some valid criticisms to be made about how effectively and strategically some of these issues have been followed up. As the article clearly points out, there are.

One could reasonably argue that because housing, never mind housing exclusion and homelessness, is not a competence of the EU and because compiling data on this sector has thus not been a priority for decision makers at EU level then the creation of a broader focus on social policy and its interactions with other policy areas can only be helpful in this regard. It creates an opportunity to show that that there are increasing interactions between housing and EU policies and that there thus needs to be a more effective monitoring and analysis of the main issues and trends taking place in this area, including on housing exclusion and homelessness.

The NAPs/inclusion

I would strongly agree with the criticism in the article that the National Action Plans on social inclusion (NAPs/inclusion) 'became quite quickly a bureaucratic exercise for a growing number of Member States and few had any real strategic policy development on the issues of homelessness' or, I would add, on other aspects of poverty and social exclusion. This echoes the analysis of the EU Network of Independent Experts on Social Inclusion, which concluded:

> In only a small minority of countries, not more than a quarter according to the experts, can the process be said to have become an important part of the policy making process in relation to social inclusion issues and to be having a significant impact. The key determining factor in the countries where the process is having a significant impact is a high level of political importance and leadership in relation both to poverty and social exclusion generally and to making use of the Social OMC in particular. However, in most Member States it would appear that the process has a very low political priority and status and is considered to be mainly an administrative reporting exercise. (Frazer and Marlier, 2008, p.3)

However, for all their limitations, the NAPs/inclusion still remain the key tool within the Social OMC requiring Member States to address poverty and social exclusion in a comprehensive manner and to report regularly on the progress that they are making. The challenge is thus not to abandon the NAPs/inclusion but to strengthen them. This, of course, requires greater political commitment.

Indeed, low political priority is probably the core point that is underdeveloped in the article. While there are a range of criticisms of the effectiveness of the Social Protection Committee (SPC) and of the role of the European Commission, some valid but others a bit simplistic, the article does not give sufficient attention to the diminution in political commitment that has taken place in the EU since 2001 – in many Member States and also in some parts of the Commission. This has severely curtailed the potential of the Social OMC in general and the national action plans on poverty and social exclusion in particular and has limited what the SPC and supportive officials within the Commission have been able to achieve.

Process Versus Policy

An area where I would strongly disagree with the article's analysis is the suggestions that the Commission has tended 'to select "easy" issues to work on' and that this has led to an undue focus on process and especially on stakeholder participation. I think this is mistaken on a number of grounds. The suggestion that working on process or on content are somehow mutually exclusive alternatives does not

tally with my experience. Both are necessary and this was recognised from the outset in the common objectives agreed by Member States.

I cannot think of a policy area in relation to poverty and social exclusion, including housing exclusion and homelessness, where the involvement of stakeholders, and in particular the involvement of those experiencing poverty and social exclusion, is not essential to arrive at better policies, better implementation and better monitoring of those policies and to ensure the empowerment of those experiencing poverty. Furthermore, 'participation' is not a straightforward issue. Anyone who goes back to read the early NAPs/inclusion would realise just how weak many Member States were in this area and how resistant they were to making progress on this issue. The progress that has been made since then, though still far from perfect, is one of the most positive outcomes of the Social OMC to date.

The suggestion that the Social OMC has been concerned only with 'easy' issues conflicts with reality. For instance, when the OMC started there was significant resistance, especially within the Commission, to focusing part of the effort on child poverty. The significant progress that is now being made on this issue is the result of effective and strategic efforts by a range of key NGOs, several academics and a number of supportive officials within the Commission and some Member States (Frazer, 2006). Indeed, it shows just how progress can be made when a strategic and cooperative approach to using the Social OMC is adopted by key actors. In this respect, the SPC's report *Child Poverty and Well-Being in the EU*, whose analysis and concrete recommendations were endorsed in 2008 by the Commission and all the Member States, was a major step forward.

There are also a number of other issues that have been prioritised within the process that are certainly not easy. The major effort made over the past year by the Commission and other actors on active inclusion was motivated by a real desire to make progress on the issue of adequate minimum income, which is a very difficult and sensitive political issue. Likewise, the Commission has recently been to the fore in trying to give more attention within the process to the situation of migrants and ethnic minorities; again, not an easy issue. Also, those people in the Commission actively involved with the Social OMC have tried very hard to put the issue of the interconnections between social inclusion policies and economic and employment policies on the agenda. Again, this is most certainly not a 'soft' issue either within or outside the Commission. Nor are the current efforts of the SPC and Commission to strengthen the monitoring of the impact of the economic and financial crisis on people experiencing or at risk of poverty and social exclusion.

Access to Expertise

The article is certainly correct to highlight the lack of resources and expertise in the Commission on issues of poverty and social exclusion. When I worked in the Directorate-General for Employment, Social Affairs and Equal Opportunities (DG EMPL) it was my experience that there were too few of us allocated to work on the EU's social inclusion process. This undoubtedly limited the capacity to develop detailed content on specific issues. There has been some improvement since then but there are still probably insufficient policy analysts in the social inclusion unit to do justice to all the issues satisfactorily. However, there was always recognition of this constraint and this was a major reason to resource external expertise from European networks such as FEANTSA, European Anti-Poverty Network (EAPN), European Social Network (ESN) and Eurochild, to fund thematic studies, to support peer reviews and to enable exchange projects. Nevertheless, it is undoubtedly true that a persistent practical weakness of the process has been the failure to bring together or cluster efforts sufficiently around a number of key issues such as child poverty and homelessness and housing exclusion in a really strategic manner so as to maximise the impact and learning.

The creation of the EU Network of Independent Experts on Social Inclusion early in the process was also a deliberate effort to increase the expertise available to the Commission. However, it is not the case that 'this network also concentrates heavily on the NAPs as the main tool of the Inclusion OMC and does little to increase expertise on current and future priority issues'. In fact, from 2006 to 2009, the network will have written thirteen reports for the Commission, only two of which were assessments of the NAPs/inclusion. Other topics have included child poverty, active inclusion, minimum resources, feeding in and feeding out (i.e. the synergies that ought to be sought by countries between the three pillars of the EU Lisbon Strategy), integrating immigrants, the impact of the financial and economic crisis, minimum income schemes and housing exclusion and homelessness. Given the knowledge and track record of the experts on many of these issues it seems surprising that the article concludes that they do little to increase expertise. Any one in any doubt should actually read their reports.[1]

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[1] More details about the network can be found online at www.peer-review-social-inclusion.eu/network-of-independent-experts or on the Commission's social inclusion website.

Role of Networks

I was surprised to read the view that 'Some NGOs, such as the European Anti-Poverty Network (EAPN), concentrate heavily on the NAPs process; while others, such as FEANTSA, have developed a more independent course of action over the years, and concentrate on the NAPs process only in as far as it can help advance the cause they are working on.' If that is the approach of FEANTSA, then such a detached attitude to the NAPs process may help to explain why, according to the article, FEANTSA has often found it difficult to establish an effective working relationship with the Commission officials responsible for the process. Among other things, involvement in the NAPs process has always been a key reason, if not a condition, for the Commission funding such networks. While it is appropriate that FEANTSA should first and foremost be concerned about its own agenda, it is surprising that working to make the whole EU process function as well as possible in partnership with all the other stakeholders would not also be a concern for reasons not only of solidarity but also, in effect, of self-interest.

I was also very surprised to read the interpretation of EAPN's role. I have certainly always found EAPN to provide a very independent voice. Also, my impression is that EAPN has very effectively tried to make the Social OMC, including the NAPs/inclusion, work as a process and also to focus on particular issues. For instance, EAPN's work on the content of both active inclusion in general and minimum income provisions in particular has been a very important contribution to trying to advance efforts to address poverty and social exclusion at EU level. Other areas that also stand out as being very important and which go well beyond the NAPs/inclusion include EAPN's efforts to strengthen the social inclusion dimension of the Structural Funds; to promote the participation of people experiencing poverty; to link tackling poverty to addressing issues of inequality and discrimination; and to work constantly to influence the wider Lisbon process on growth and jobs so as to have a stronger social dimension.

Likewise, if I look at the work of Eurochild, it seems to me also a good example of how it is possible for a European network to combine both a focus on the NAPs/inclusion with a wider approach to the issue of child poverty. Such an approach ranges from working on the Commission's initiative on children's rights to developing very specific ideas in areas such as early years education and care, family and parenting support, child and youth participation and children without parental care. This has resulted in considerable progress being made on the measurement and monitoring of child poverty and on the identification of policies that work. It has led to greater political commitment on this issue.

Data Collection

The importance attributed to improvements in data collection on homelessness and housing exclusion by the article is something I would strongly concur with. In my view, until recently, the lack of up-to-date, comparative European data on all aspects of poverty and social exclusion (not just homelessness) has been the process's Achilles heel. It has greatly limited the possibility for using the process to monitor progress and to put pressure on those Member States lagging behind. The work to get agreement on common indicators has been very important, as have the improvements to data resulting from the EU Survey on Income and Living Conditions (EU-SILC) though there is still some way to go on documenting the position of those not covered by these data who are often experiencing extreme poverty. Of course, the article is right to point out that progress on indicators on housing exclusion and homelessness was for a long time disappointingly slow, particularly the failure to agree an indicator on homelessness. However, the July 2009 agreement on EU indicators in the field of housing (covering overcrowded households and households overburdened with housing costs) is an important step forward.

The article also rightly highlights the very important work done by FEANTSA in developing the ETHOS typology on housing exclusion and homelessness and the success of its efforts to encourage and support the Commission to undertake important studies in this area. These studies (particularly the measuring homelessness study and Mphasis project) are leading to a further important step forward and show just what can be achieved on issues like housing exclusion and homelessness when the EU process is used effectively. Also, the ETHOS definition has the important strength of ensuring that there is not only a focus on extreme situations of rooflessness and homelessness but rather a broader approach that also addresses other key aspects of poverty such as inadequate and insecure housing and social isolation. It helps to put the focus on prevention as well as on helping people who are already homeless.

Several OMCs?

Finally, I am not convinced by the article's conclusion that the best way forward is to replace the Social OMC with a series of separate OMCs on different thematic issues. I have five particular reasons for this view:

- Most importantly, it would be a mistake to break down the issue of poverty and social exclusion into a series of separate boxes. If there is one thing above all else we have learned from the EU process since 2001 it is that poverty and social exclusion are multidimensional phenomena which need to be addressed in an integrated and coordinated manner. Issues such as homelessness, inadequate

income, child poverty, poor access to services, exclusion from the labour market and discrimination against minorities all overlap. While at certain moments focused action may be needed to assist particular groups, such action needs to be set in the broader context of effective overall social inclusion policies.

- The separation into a variety of different little OMCs does not address the core problem that has bedevilled the Social OMC: the lack of political commitment to take real action to build more inclusive societies.

- A series of separate OMCs would not be very practical or effective. The result would be to dilute and weaken the overall social inclusion dimension in relation to the jobs and growth strands of the EU just at a moment when it is possible to envisage strengthening this dimension by, first, developing strong links between social inclusion and environmental/sustainable development issues and, second, taking advantage of the Lisbon Treaty, which, for the first time, makes the combating of social exclusion and discrimination and the promotion of social justice and protection objectives of the Union. The likely overall result of the limited and narrow approach advocated in the article would, in fact, be to weaken the SPC and to reduce its political status within EU structures. In the end this would be damaging for those concerned about homelessness and housing exclusion.

- By downplaying the importance of the NAPs/inclusion instead of insisting that they become what they were originally intended to be (i.e. strategic planning tools leading to real action at national and sub-national levels to address issues of poverty and social exclusion) one would be in danger of removing the one potentially concrete aspect of the process. The NAPs/inclusion are the only part of the EU process that puts pressure on Member States to take action on and report regularly on the broad range of poverty issues in their country. The likely consequence of downplaying the role of the NAPs/inclusion would be to end up with a very soft process that would just facilitate the exchange of learning and good practice and the collection of data.

- There is a real danger that by only focusing on what is perceived as 'extreme' poverty the EU's attention would become limited to alleviating the problem rather than focussing on ensuring the policies that create an inclusive society which prevents, as far as possible, the problems arising in the first place. In any case (as the ETHOS definition demonstrates) 'extreme' poverty is not somehow separate or different from poverty more generally. Rather it is more useful to think of a continuum of interconnected situations, some more severe than others, that need to be addressed in a comprehensive and integrated manner.

In my view, it would be more effective and certainly better for the long-term struggle to combat poverty and social exclusion in the EU to argue for a stronger overall Social OMC. This would build on the progress that has been made to date. At the same time it should also be possible, within the framework of the Social OMC, to consolidate the work on a series of key themes such as child poverty, active inclusion, the integration of migrants and ethnic minorities and housing exclusion and homelessness. Thus, the useful concept outlined in the article of 'clusters of (European) stakeholders and of activities such as studies, peer reviews and data collection around the different themes' would be possible as part of the wider process. Such an approach is already in use in the Commission, for instance in the Research Directorate-General (DG RTD) framework programmes. Indeed, clustering could be a very useful way of going beyond the confines of the social inclusion process. For instance, one could use it to build on existing research – whether this research was funded by DG EMPL, DG RTD or other Commission bodies. However, an emphasis on a thematic and clustering approach within the OMC would not, and should not, be at the price of sacrificing the vital requirement for Member States to prepare NAPs/inclusion and to report regularly in a comprehensive and integrated fashion on what they are doing to prevent and address poverty and social exclusion.

If a stronger overall Social OMC is to be achieved post-2010 it will need to be strengthened in six key and closely interrelated areas. Only then is it likely to be able to truly contribute to meeting the objective of making a decisive impact on the eradication of poverty and social exclusion. The six areas are:

• Ensuring that the EU overall adopts an integrated and sustainable approach to development in which a strong social dimension is developed alongside economic, employment and environmental policies.

• Raising the political status and importance of the Social Protection and Social Inclusion OMC.

• Making the process more rigorous, more challenging and more comparative.

• Strengthening governance in relation to social inclusion issues.

• Increasing awareness of the process at both EU and (sub-) national levels.

• Enhancing the exchange of learning and good practices.[2]

2　See Frazer and Marlier (2008) for an elaboration on how these areas can be strengthened.

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