

EUROPEAN SOCIAL POLICY NETWORK (ESPN)

Access to essential services for low-income people

Italy

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Social Europe

EUROPEAN COMMISSION

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European Social Policy Network (ESPN)

ESPN Thematic Report on Access to essential services for low-income people

Italy

2020

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Quoting this report: Raitano, M., Natili, M., Jessoula, M., Pavolini, E. (2020). ESPN Thematic Report on Access to essential services for low-income people – Italy, European Social Policy Network (ESPN), Brussels: European Commission.

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Summary

Article 43 of the Italian constitution refers to "essential public services" as those services of major public and general interest, which have to be guaranteed by the state and may be managed by public institutions and/or by private regulated firms. The expression "essential public services" is also used in the legislation concerning the right to strike for workers employed in specific service sectors, where an explicit reference is made to the need to guarantee access to sanitation, water, energy and public transport (Law 146/1990).

In Italy, there is no single definition of low-income people for the delivery of the six essential services under scrutiny (water, sanitation, energy, transport, digital public services and financial services). Indeed, means-testing conditions to ensure access for low-income people differ among the various services, even if they are all based on the same indicator of economic conditions, namely the indicator of the equivalised economic condition (ISEE), computed taking into account both household income and wealth. In all the policy domains under consideration, specific national means-tested measures exist to facilitate access to services for low-income people, the exception being public transport, which is instead managed by regions. Therefore, there are bonuses for all six services considered in Italy. More precisely, at the national level in the last decade both in-kind benefits (the "water bonus") and reduced tariffs were introduced (the "waste tax" rebate, the "electricity bonus", the "gas bonus", a reduced fee for phone and internet connection, and the provision of a "zero cost" bank account), while the rules for the entitlement of low-income people to reductions in the price of train and bus passes vary extensively across regions.

The unprecedented attention to poverty and social exclusion – also revealed by the introduction and revision of a minimum-income scheme, in 2018 and 2019 respectively – has gradually led to more careful consideration of low-income people's access to (some of) the essential services under scrutiny. In particular, the 2020 Budget Law improved the overall policy framework, guaranteeing the harmonisation of the rules for access to the minimum-income scheme in place – the Citizenship Income – and the various types of means-tested bonuses, easing access to some essential services. However, further steps must be taken, since the take-up of the bonuses for access to the six essential services is very limited and the amount of these bonuses is rather low.

The 2020 Budget Law introduced some changes in the Italian policy framework concerning access to essential services for low-income people, increasing the annual ISEE threshold for being entitled to the bonuses for water, sanitation, electricity and gas and establishing that, from 2021, the beneficiaries of the Citizenship Income will be automatically entitled to these bonuses, with no need to re-apply every year. Instead, there are no ongoing or announced reforms, either at the national or at the subnational level, as regards public transport and digital and financial services.

Focusing on access to energy, it has to be emphasised that there is a problem of increasing costs for energy services and that a large number of individuals may be considered "energy poor" in Italy. To deal with energy poverty, three interrelated (and complementary) policy measures appear particularly important: i) improving buildings' energy efficiency; ii) reducing prices for consumers, which have instead greatly increased in recent years, partly due to the need to finance the transition towards renewable sources; and iii) sustaining household income. Finally, the policy framework has created important differences among low-income people concerning the possibility of accessing energy services, as those who do not use methane gas as a heating source are not entitled to the gas bonus. No studies analysing the causal effect of the lack of adequate access to energy services on individuals' health and social exclusion have been carried out in Italy. Nevertheless, a recent survey showed that energy-poor pensioners had a much higher propensity than non-energy-poor retirees to consider that the temperature in their dwelling was a crucial driver of health status.

1 Overview of national/subnational measures aimed at supporting low-income people in accessing essential services

According to Principle 20 of the European Pillar of Social Rights (EPSR), everyone should have "the right to access essential services of good quality, including water, sanitation, energy, transport, financial services and digital communications". Moreover, support for accessing such services should be available for those in need.¹ The importance of ensuring access to essential services is also well established globally in the framework of the United Nations 2030 Agenda for Sustainable Development and its 17 related Sustainable Development Goals (SDGs) which was endorsed in 2015 by all UN countries including all EU countries.² This report investigates the extent to which Principle 20 of the EPSR has already been implemented in the six services under scrutiny in Italy. The group of "those in need" is restricted in the report to people on a low income and low-income households.

1.1 Definition of "essential services"

Article 43 of the Italian constitution defines "essential public services" as those services of major public and general interest which have to be guaranteed by the state and may be managed by public institutions (be it the state or subnational entities such as regions, metropolitan cities, provinces, municipalities) and/or by private firms, under strict public regulation.

The expression "essential public services" is also used in the legislation concerning the right to strike for workers in some particular services (Law 146/1990, modified by Law 83/2000): Article 1 of Law 146 defines essential public services as those aimed at "guaranteeing constitutionally protected individual rights to life, health, freedom and security, freedom of movement, social assistance and social security, education and freedom of communication", regardless of whether these services are publicly provided or outsourced to private companies.

As concerns the six essential services under scrutiny in this report, it has to be pointed out that Law 146/1990 makes explicit reference to the need to guarantee access to sanitation, water, energy and public transport, whereas no reference is made to digital or financial services.

Other laws – mostly related to anti-poverty measures – refer to "essential levels of services", but these frameworks do not include specific reference to the six essential services under scrutiny in this report. In the specific field of anti-poverty policies, the 2000 reform for integrated social policies (Law 328/2000) introduced "essential levels of assistance" (*i livelli essenziali delle prestazioni sociali* – Liveas) specifically targeted at poor people: i) income support measures and accompanying services; ii) income support measures for dependent and frail individuals; iii) measures to support minors in situations of hardship; iv) measures to support family responsibilities; v) measures to support women in difficulty; vi) social interventions for the full integration of disabled people; vii) interventions for elderly and disabled people; viii) integrated socio-educational benefits to combat drug, alcohol and drug addiction, promoting preventive, recovery and social reintegration measures; and ix) information and advice for

¹ The EPSR was jointly proclaimed by the European Parliament, the European Council and the European Commission on 17 November 2017. For more information on the EPSR, see: https://ec.europa.eu/commission/priorities/deeper-and-fairer-economic-and-monetary-union/european-pillar-social-rights/european-pillar-social-rights-20-principles_en.

² The SDGs and their targets seek to realise the human rights of all, by promoting an integrated notion of sustainable development aimed at creating synergies between economic, environmental and social policies and objectives. For more information on the SDGs, see: <u>https://www.un.org/sustainabledevelopment/sustainable-development-goals/</u>.

individuals and households to encourage the use of services and to promote self-help initiatives.

However, the 2001 reform of title V of the constitution (Constitutional Law 3/2001) modified the institutional framework in which Law 328 was embedded, assigning exclusive competence on social assistance and social services to regions (Madama, 2010). The state was in fact no longer able to issue in-depth guidance and set standards to be guaranteed across the whole territory, unless these services were defined as essential (Liveas) by an agreement between the state and the Council of Regions (Naldini and Saraceno, 2008). A new regulatory framework was then delayed for almost two decades, until the adoption of the Inclusion Income in 2017 (Reddito di Inclusione - REI). The relevant law (Law 147/2017) introduced uniform national standards for the provision of integrated social services for the poor, considered an essential level of service to be provided throughout the national territory (Natili, 2019; Raitano et al., 2018). These national standards include: the presence of a single point of access to social services (segretariato sociale); professional social services implementing the "multidimensional personalised assessment" of individuals' needs; specific traineeships to foster personal autonomy and rehabilitation; home-based or territorial socio-educational support, including support in the management of household expenditure and budgets; socioeducational home care and outreach services; parenting support and family mediation services; cultural mediation; and emergency social intervention services. These essential levels of services were maintained with the recent law (Law 4/2019) introducing the Citizenship Income (Reddito di Cittadinanza - RdC, which also includes some specific active labour market services.

1.2 Definition of "low-income people" used in the context of access to services

Despite the fact that there are bonuses for all six services considered, a single definition of low-income people for the delivery of these services does not exist in Italy. Indeed, means-testing conditions designed to favour some individuals and households in accessing these services differ among the various services. Specifically, as explained in Sections 1.3 and 1.4, means-testing conditions differ both among benefits delivered at the national level (i.e. bonuses for water, sanitation, energy and access to digital and financial services) and among benefits delivered at the regional level (i.e. benefits related to public transport, which in Italy are managed at the subnational level). Note also that – apart from cases in which beneficiaries of minimum-income benefits (i.e. the Citizenship Income) are automatically entitled to pay lower tariffs for access to essential services – the means-testing conditions used in the context of access to services do not correspond to the thresholds used for entitlement to the Citizenship Income, or to the social assistance benefits protecting the elderly (e.g. the minimum pension, *integrazione al minimo pensionistico*, and the social allowance, *assegno sociale*).³

Nevertheless, all benefits favouring low-income people are based on the same indicator of individuals' and households' economic needs, namely the indicator of the equivalised economic condition (*Indicatore della Situazione Economica Equivalente* – ISEE), which is computed by adding household income and 20% of the value of household wealth, then dividing by a specific equivalence scale to homogenise the indicator for individuals living in households with different sizes.

In more detail, the following are the various definitions of low-income people used in 2020 in the six services under scrutiny.

³ Note that in Italy there is no official means-test threshold, since the monetary conditions to be eligible for the various social assistance transfers vary among the various types of benefits (e.g. the means-testing conditions of Citizenship Income and social allowance largely differ).

- To receive the water bonus (introduced in 2017): an annual ISEE no higher than €8,256 - or €20,000 for households with at least four dependent children. Recipients of the Citizenship Income are also entitled to the water bonus if their annual ISEE is no higher than €8,256.⁴
- 2. To receive the relief on the waste tax (introduced by the Budget Law for 2020): details about the means-testing conditions have not been defined yet, but they are expected to be the same as for energy bonuses (see below).
- 3. To receive the energy bonuses (i.e. electricity bonus and gas bonus, introduced in 2008 and 2009 respectively): an annual ISEE no higher than €8,256 or €20,000 for households with at least four dependent children. Recipients of the Citizenship Income are also entitled to these bonuses, independently of their ISEE.
- 4. Conditions to be entitled to public transport fare reductions are established by the regions, and thus vary greatly (see Section 1.3.4).
- 5. To be entitled to the reduced fee for access to a phone and internet line (introduced in 2018): an annual ISEE no higher than €8,256.
- 6. To be entitled to open and use the zero-costs bank account with basic features (introduced in 2018): an annual ISEE no higher than €11,600 or, for pensioners, a pension income for single individuals no higher than €18,000.

Moreover, it should be noted that – apart from the conditions for favoured access to the six essential services – a shared definition of low-income or poor people does not exist in Italy, since both official statistics and the eligibility requirements for means-tested benefits follow different criteria and thresholds.

On the one hand, official statistics on poverty provided by the Italian Statistical Institute (ISTAT) rely on both an absolute and a relative approach. Thus, identification of the poor is not based on a single poverty line in Italy. Absolute poverty lines are calculated by considering a fixed basket of goods and services (including a minimum food basket, plus housing needs and an allowance for non-food basic needs) considered essential for each household – according to the number and age of its members, the geographical area of residence and the municipality demographic size - to attain the minimum acceptable standard of living (see Cutillo et al., 2019). Therefore, since needs vary according to household composition, while the cost of the basket changes according to the area of residence, ISTAT calculates a set of absolute poverty thresholds (around 350 different poverty lines), instead of a single threshold. Conversely, a two-person household is considered relatively poor when its spending is lower than per capita mean spending, whereas relative poverty lines for differently sized households are computed according to a specific equivalence scale. Furthermore, the AROP (at risk of poverty) indicator - where the relative poverty line is based on a percentage (usually 60%) of the median of national equivalised disposable income – is used in official statistics.

On the other hand, since July 2018 a national minimum-income scheme targeted at lowincome households has existed in Italy, namely initially the REI, replaced by the more generous Citizenship Income from April 2019 (Raitano et al., 2018; Jessoula et al., 2019). Apart from a series of non-monetary requirements and specific conditions related to household wealth, the eligibility conditions for both schemes are based on the annual ISEE, but the definition of beneficiaries changed between the REI and the Citizenship Income, because of the increase in the ISEE thresholds used for means-testing. Indeed, individuals were eligible to the REI when their annual ISEE did not exceed €6,000 and the income component of ISEE did not exceed €3,000 per year. Conversely, individuals are now eligible to the Citizenship Income when their annual ISEE does not exceed

⁴ As mentioned, the ISEE value refers to equivalised individuals. To obtain the means-testing threshold for different-sized households, the value of the ISEE (€8,256 in this case) has to be multiplied by the specific equivalence scale used for the ISEE, whose values are, for instance, 1.57 for two-person households, 2.04 for three-person households and 2.46 for four-person households.

€9,360 and their equivalised income (computed through an equivalence scale less favourable for large households than the scale used for the ISEE) does not exceed €6,000 per year. Finally, notice that specific social assistance benefits devoted to the elderly (e.g. minimum pension, social allowance) use household income instead of the ISEE as the reference point for means-testing – apart from the Citizenship Income which, under certain conditions, is also paid to the elderly (when beneficiaries are aged over 67 it is called Citizenship Pension; Jessoula et al., 2019).

1.3 Measures for facilitating access for low-income people to services

1.3.1 Access to water

According to data from the European Union statistics on income and living conditions (EU-SILC), the share of households who live in dwellings without a bathtub or shower for their sole use is very low in Italy (0.63%), and this share remains almost negligible when considering households in the first quintile of equivalised disposable income (0.92%).⁵ Therefore, a serious problem in physical access for low-income people to water is not apparent.

However, problems related to the affordability of water bills might exist for low-income people. To deal with this issue, a specific in-kind benefit called a water bonus (*bonus acqua*) was introduced in July 2018.

Individuals entitled to this benefit receive – free of charge – 50 litres of water per day, corresponding to 18.25 cubic metres per year (in the case of households with more than one member, the free amount is multiplied by the household size). This amount – considered by law as the minimum amount for satisfying personal needs – is deducted from water consumption in computing the bill of households entitled to the water bonus.

The water bonus is provided when the household satisfies at least one of the following three means-testing conditions, based on the ISEE (which takes into account both household income and wealth; see Section 1.2):

- a) an annual ISEE not higher than €8,256;
- b) an annual ISEE not higher than €20,000 for households with at least four minors;
- c) being a recipient of the Citizenship Income and having an annual ISEE not higher than €8,256.

The water bonus is granted to households who specifically apply for it. Its duration is 12 months, after which re-application is required. Local authorities may either further increase the value of the water bonus or increase the ISEE thresholds under which the household is entitled to the benefit. Note also that in the case of temporary arrears in the payment of a water bill, a basic supply equal to 50 litres per day for household member has to be guaranteed to everyone in Italy.

1.3.2 Access to sanitation

According to EU-SILC data, in Italy the share of households without a flushing toilet for their sole use is very low (0.77%), and this share remains almost negligible when considering households belonging to the bottom quintile of equivalised disposable income (0.89%).⁶ Therefore, a serious problem in physical access for low-income people to

⁵ These statistics are based on EU-SILC 2015. For comparison, note that the share of households living in a dwelling without a bathtub or a shower for their sole use is 1.88% in France (3.22% for households belonging to the first quintile of the distribution of the equivalised disposable income).

⁶ These statistics are based on EU-SILC 2015. For comparison, note that the share of households living in a dwelling without a bathtub or a shower for their sole use was 1.81% in France (3.29% for households belonging to the bottom quintile of equivalised disposable income).

sanitation is not apparent. However, problems related to the affordability of the waste tax may emerge for low-income people.

The waste tax, named TARI (*tariffa rifiuti*), introduced in 2014, is one of the three components of the municipal single tax (IUC), which serves to cover the cost of urban hygiene services. TARI tariffs are established by municipalities, and the specific amount to be paid by households depends on the characteristics of areas of residence, dwellings (e.g. size, measured in square metres) and households (the number of members).

Exemptions based on the ISEE are established case by case by some municipalities (e.g. in Rome those with an annual ISEE lower than $\in 6,500$ are exempted from this tax, while in Trento there is a 20% reduction for those with an annual ISEE lower than $\in 5,000$). The amount of the TARI is in many cases not negligible: on average, in Italy, the amount of the TARI is around $\in 320$ per year, but values vary greatly between municipalities. For instance, in Rome, the TARI mean value is approximately $\notin 400$ per year, while in Naples and Cagliari it is approximately $\notin 450$ and $\notin 520$, respectively.⁷

However, the Budget Law for 2020 has introduced, as a national measure, the "TARI bonus", that consists of a rebate on the amount of the waste tax paid by low-income households. Details about the size of the benefit and the identification of low-income people entitled to this bonus have not yet been established (they had to be fixed by April 2020). As concerns the means-testing conditions, they are expected to be the same as for the electricity and gas bonuses (see Section 1.3.3), namely:

- a) an annual ISEE not higher than €8,256;
- b) an annual ISEE not higher than €20,000 for households with at least four minors;
- c) being a recipient of the Citizenship Income (even if the annual ISEE exceeds $\in 8,256$).

1.3.3 Access to energy

Energy poverty is a particularly important topic in southern European countries: elaborations on EU-SILC data reveal that Italy has the third highest share among the EU-15 countries of households unable to afford to keep their home adequately warm,⁸ while estimates by the Italian Observatory on Energy Poverty (*Osservatorio Italiano sulla Povertà Energetica* – OIPE) found that approximately 2.2 million households – 8.7% of the total– could be considered energy-poor according to the energy poverty indicator chosen in the national energy strategy (OIPE, 2019).⁹ A more detailed focus on energy poverty is presented in Section 3 of this report.

To facilitate access to energy services for low-income households, two specific bonuses are aimed at reducing tariffs in Italy, namely the electricity bonus and the gas bonus, which were introduced in 2008 and 2009 respectively.

These two energy bonuses are provided when households satisfy at least one of the following three means-testing conditions:

- a) an annual ISEE not higher than €8,256;
- b) an annual ISEE not higher than €20,000 for households with at least four minors;
- c) being a recipient of the Citizenship Income (even if the annual ISEE exceeds €8,256).

⁷ See <u>https://www.cittadinanzattiva.it/corporate/consumatori/1847-osservatorio-prezzi-e-tariffe.html</u>.

⁸ For instance, according to EU-SILC data for 2015, this share amounted to 17.4% in Italy while the EU-15 mean value was 8.7%, and only Portugal (25.3%) and Greece (29.1%) exceeded the Italian value. For comparison, note also that, in EU-15 in 2015, 7 countries out of 15 had a share of households unable to keep their home adequately warm lower than 5% and 11 countries had a share lower than 9%.

⁹ As explained in Section 3, a low income/high cost indicator for energy poverty has been chosen in the national energy strategy (Faiella and Lavecchia, 2015; OIPE, 2019).

Energy bonuses are granted to households that specifically apply for these bonuses and they are provided for 12 months, after which applications must be resubmitted. Electricity and gas bonuses are provided through a rebate on the amount to be paid for electricity and gas bills.

The yearly amount of the electricity bonus depends on household size: ≤ 125 for households with at most two members, ≤ 153 for households with three or four members and ≤ 184 for households with at least five members.

The amount of the gas bonus changes according to the type of usage of gas (domestic hot water and cooking only, or also for heating), household size (up to, or more than, four members) and the climatic conditions of the area of residence (when gas is also used for heating). When gas is only used for hot water and cooking – according to the type of boiler installed in the dwelling – the yearly amount of the bonus (i.e. the reduction in the tariff to be paid) is \in 32 and \notin 49 for households with up to or more than four members, respectively. When gas is also used for heating, the amount of the bonus varies according to the climatic area from \notin 72 to \notin 182 for households with up to four members and from \notin 100 to \notin 264 for households with more than four members. Note that the values of the gas bonus were defined in order to engender an approximately 15% rebate on the annual gas bills of low-income people.

Also note that, in the case of arrears in the payment of gas bills, a basic supply (i.e. 15% of the normal supply) has to be guaranteed to all clients for 15 days before the supply is cut off, while no temporary guaranteed supply of electricity exists in the case of bill arrears.

1.3.4 Access to public transport

According to the 2012 EU-SILC ad hoc module, the share of households who had difficulties in accessing public transport for physical or technical reasons (e.g. where public transport is either not adapted to guarantee access by disabled people, or is too far away or has an inappropriate timetable) is very high in Italy – 29.9% – while the EU-28 value is 19.6%. Only Croatia has a higher share. Generally, in Italy, inability to access public transport is more related to inadequate service provision than the cost of tickets. According to the data collected in the EU-SILC 2014 ad hoc module, the share of individuals who did not use public transport because tickets were too expensive was 0.6% in Italy, while the EU-28 value was 2.5%.

Since 1997 (decree no 422/1997), Italian regions have had the responsibility for managing and organising local public transport (regional trains and buses) and may decide to introduce reduced tariffs. Most regions have introduced rebates on annual tickets for some categories, especially students and the elderly. Some regions also provide rebates for low-income people. However, the rules for the identification of low-income people entitled to discounted tickets, and the amount of the rebate, differ extensively among the various regions, even if, in almost all cases, the ISEE is used as the monetary indicator for being entitled to reduced tariffs.

Among the regions that provide reduced tariffs for all individuals with an ISEE below a certain threshold, Campania reduces tariffs (by approximately 25%) for individuals with an annual ISEE lower than $\leq 12,500$ ($\leq 10,000$ if aged over 65); in Tuscany, reduced tariffs exist for those with an ISEE lower than $\leq 36,152$; in Lazio a 30% rebate favours residents with an annual ISEE lower than $\leq 25,000$ and the rebate increases to 50% where the ISEE does not exceed $\leq 15,000$; in Liguria the schedule for rebates is very complex and only individuals with an annual ISEE not higher than $\leq 12,000$ receive some benefits; in Sicily, from 2020, individuals with an annual ISEE lower than annual ISEE lower than $\leq 20,000$ pay a reduced fare (by approximately 30%) for flights direct to Italian cities.

Other regions provide reduced tariffs based on the ISEE for specific categories only. In Marche, rebates of 25% and 50% on bus and train passes respectively are provided for dependent workers, unemployed people and those aged over 65 with an annual ISEE

below $\in 6,500$; in Lombardia those aged over 65 pay a reduced tariff if the annual ISEE is below $\in 12,500$; likewise, in Emilia Romagna, only some categories (the elderly and those living in households with at least four dependent children and an annual ISEE lower than $\in 18,000$) pay reduced tariffs.

Furthermore, at the national level, starting from 2018, 19% of spending on bus and train passes may be deducted from personal income tax, up to a \in 250 yearly maximum deduction. Even if this tax deduction is not specific to low-income households, its schedule – based on a reduction in taxes with a maximum amount for a service that is relatively more used by poorer individuals – mostly favours less advantaged individuals. It should also be noted that parents are entitled to tax deductions for the cost of train and bus passes for their dependent children. However, individuals who have an income within the "no-tax area" – that is, they do not pay the personal income tax since their income is too low – cannot benefit from this tax deduction.

1.3.5 Access to digital public services

In Italy, many public institutions increasingly provide digital public services. Individuals residing in Italy may ask for a single username – through a public system of digital identity (*Sistema Pubblico di Identità Digitale* – SPID) – for accessing a number of digital services (e.g. filling in personal income tax returns or paying other taxes; checking the accrual of contributions to the public pension system; asking for certificates). The SPID is also used by some regions and municipalities to organise access to health services.

Furthermore, all regions – including those not making use of the SPID for identification purposes – provide digital public health services, mostly used for prescriptions and booking medical examinations online. Therefore, after some delays, the provision of digital public services appears now to be adequate in Italy, even if territorial heterogeneity in the provision of services persists.

As a result, possible problems for low-income people in accessing digital public services do not primarily arise from the provision of these services, but mostly from two factors: i) the costs of having an internet and telephone connection for accessing these services;¹⁰ and ii) the availability of broadband for internet access.

As concerns the first issue, from 2018 a reduced fee for access to a telephone and internet line has been introduced for low-income people, who are defined as those with an ISEE below &8,256 per year. In more detail, households that satisfy the meanstesting condition benefit from a 50% rebate on the monthly fee for access to a telephone line from TIM, the phone company that is charged with guaranteeing phone services and the telephone network in Italy. Specifically, they pay &9.50 instead of &19 and also have 30 minutes of free phone calls per month. Moreover, consumers who satisfy the meanstest may subscribe to internet flat fares with other phone providers without losing the right to pay the reduced fee. This is a novelty, since before 2018 only some categories of individuals who satisfied ISEE conditions benefited from the reduced fee – namely those aged over 75, the disabled and the unemployed. It has to be noted, however, that beneficiaries of the Citizenship Income are not automatically entitled to pay this reduced tariff.

1.4 Access to financial services (Directive 2014/92/EU)

In transposing Directive 2014/92/EU, Italy introduced in 2018 a basic zero-cost bank account for individuals whose annual ISEE was below \in 11,600 and for pensioners who received a yearly pension benefit below \in 18,000. Thus, because of the wider means-

 $^{^{10}}$ According to data collected in the EU-SILC 2014 ad hoc module, 7.7% of individuals in Italy did not have an internet connection because they could not afford it, compared with 7.6% in the EU-28, and with much lower shares in, among other countries, Germany (4.6%), France (2.6%), the Netherlands (1.4%) and Sweden (1.1%).

testing conditions, all beneficiaries of the Citizenship Income may have access to this zero-cost account.

This bank account provides a predefined number of free-of-charge banking transactions per year: 12 cash withdrawals at the banks' counters, unlimited ATM withdrawals at the bank's branches and six at other banks, unlimited payments with a debit card, and 18 payments through bank transfers.

2 National/subnational policy frameworks and reforms

2.1 National/subnational policy frameworks

In Italy, social assistance and anti-poverty policies have traditionally played a marginal role (Madama, 2010; Natili, 2019). Anti-poverty minimum-income benefits existed exclusively in some local contexts, while the absence of a social assistance framework law contributed to the underdevelopment of social care services (Naldini, 2003; Saraceno, 2010). In the absence of a coherent anti-poverty policy framework, in the mid-2000s some specific bonuses and exemptions were introduced to guarantee access to essential public services. More precisely, the interministerial decree no 28 of December 2007 introduced the "Electricity Bonus for families in economic and physical distress', a bonus which was designed to reduce electricity and gas bills for low-income households (initially, with an ISEE below \in 7,500; see above Section 1.3.3). In 2015, a similar bonus was also introduced concerning access to water (Law No 221 of December 2015), exempting low-income households, defined using the same means-test criteria as for the Electricity Bonus for the "minimum amount of water deemed vital for the satisfaction of essential needs" (see Section 1.3.1).

These benefits remain severely underused in Italy – only a small percentage of the potential beneficiaries actually apply for them. Consumers often lack adequate information, and the benefits are not included in a coherent anti-poverty policy framework.

However, in recent years, after decades of neglect, greater attention in Italy has been given to the fight against poverty and social exclusion. The REI national minimum-income scheme was introduced in 2018, complemented by a comprehensive national strategy to fight poverty (Natili, 2019; Raitano et al., 2018). As a part of this plan, Law No 147/2017 introduced uniform national standards for the provision of integrated social services for the poor, considered as an essential level of service (Art. 23) to be provided throughout the country.

The introduction of the Citizenship Income (Law 4/2019) constituted a further step in strengthening policies to combat poverty: compared with the REI, the Citizenship Income is endowed with more budgetary resources, is more generous and inclusive, and has a longer duration (for a comparison, see Jessoula et al., 2019). Beyond providing additional resources, the new Citizenship Income maintained the uniform national standards for the provision of integrated social services for the poor introduced with the previous REI.

Nevertheless, the new focus on poverty and social exclusion has gradually led to a greater focus on access to some of the six essential services under scrutiny for low-income individuals. Indeed, with the introduction of the Citizenship Income in 2019 and the approval of the 2020 Budget Law in December 2019, a national policy framework concerning the provision of essential services to low-income individuals is gradually emerging.

As pointed out in Section 1.3, eligibility for electricity, gas and water bonuses was extended to beneficiaries of the Citizenship Income (although, as mentioned in Section 1.3.1, only beneficiaries of the Citizenship Income with an annual ISEE value below $\in 8,256$ are entitled to receive the water bonus). Furthermore, as concerns sanitation, a specific bonus was introduced by the Budget Law for 2020, namely the "Social Bonus Tari 2020", which is a reduction in the amount of the waste tax (see Section 1.3.2). Conversely, as shown in Sections 1.3 and 1.4, even if specific measures easing access to public transport and digital and financial services for low-income people exist, no rules harmonising them for the beneficiaries of the Citizenship Income have been envisaged so far. As a consequence, because of the different means-testing conditions for the Citizenship Income, and for the bonuses for digital and financial services as well as for public transport (decided at the subnational level), some beneficiaries of the Citizenship Income might not have access to these three types of benefits.

In particular, while the means-test threshold for being entitled to the bonus for financial services is higher than the monetary threshold for being entitled to the Citizenship Income – an annual ISEE amounting to $\leq 11,600$ and $\leq 9,360$, respectively – and, hence, all beneficiaries of the Citizenship Income may have access to the reduced cost bank account, some beneficiaries of the Citizenship Income cannot apply for the reduced fee for phone calls and internet, which is only provided to individuals with an annual ISEE below $\leq 8,256$.

Beyond this emerging national policy framework, traditionally in Italy the subnational (both regional and municipal) level has been particularly important in the provision of means-tested cash benefits and services for low-income households. In particular, in a number of regions (Apulia, Emilia-Romagna, Friuli Venezia Giulia, Sardinia, Trentino Alto Adige, Valle d'Aosta) a regional means-tested anti-poverty benefit exists, complementing and/or topping up the national measure. However, access to these regional programmes does not guarantee access to the six essential services under scrutiny, the only exception being a programme introduced in the Lazio Region in 2009 (Regional Law 4/2009), but not refinanced since 2011. This scheme, the "Guaranteed Minimum Income", provided a monetary benefit to the beneficiaries and, in addition, provided: i) free access to public transport; ii) a contribution towards the cost of essential public services; iii) a contribution to cover the rent cost for housing.

As concerns public transport, which is exclusively managed by regions, it has to be pointed out that a consistent subnational policy framework for protecting low-income households does not exist, as is apparent when looking at the means-testing conditions for being entitled to reduced fees, which largely differ across regions (see Section 1.3.4).

2.2 Ongoing or announced reforms

As mentioned in the previous section, the 2020 Budget Law introduced some changes in the Italian policy framework concerning access to essential services for low-income people. In more detail, on the one hand, the annual ISEE threshold for being entitled to the bonuses for water, sanitation, electricity and gas was increased, from &8,107.50 to &8,256, thus slightly increasing the share of individuals who are eligible. On the other hand, access to the water bonus is now guaranteed to beneficiaries of the Citizenship Income with an annual ISEE below &8,256 - bringing it into line with the electricity and gas bonuses, which were available to all recipients of the Citizenship Income from 2019. As discussed in previous sections, the Budget Law for 2020 has also introduced a rebate on the waste tax, benefiting low-income households and beneficiaries of the Citizenship Income.

Furthermore, in order to increase the take-up rate of the bonuses for essential services, it has been established that, from 2021, the beneficiaries of the Citizenship Income will be automatically entitled to water, sanitation, electricity and gas bonuses, without the need to apply for them every year.

However, to the best of our knowledge, there are no ongoing or announced reforms, either at national or subnational level, as regards public transport and digital and financial services.

Despite a clear improvement in the Italian anti-poverty strategy – as confirmed by both the introduction of minimum-income schemes and the strengthening of the bonuses for low-income people in respect of essential services – further steps must be taken. In particular, first, the take-up rate of the bonuses relating to the six essential services is still very limited, due to a lack of detailed information about consumers' opportunities as well as the fragmentation – and, at least until the most recent years – the inconsistency of the rules for protecting low-income people. Second, the amount of the benefits – which in most cases are provided through a reduction in tariffs – is rather low and insufficient to effectively protect low-income people from arrears in the payment of bills and to ease the affordability of public transport and digital services. Third, as the incidence and the intensity of absolute poverty (Cutillo et al., 2019) are so high (and

3 A focus on access to energy

3.1 Trend of energy poverty in Italy

In a medium-high income country such as Italy, the main issue related to access to energy for low-income people is the cost of energy services, much more than a lack of physical access to lighting and heating.

Nevertheless, as mentioned in Section 1.3.3, Italy is characterised by a high share of individuals who may be considered energy-poor, even if the incidence of energy poverty clearly depends on the choice of the specific energy poverty indicator (in particular, if a subjective or an objective approach is followed; Faiella and Lavecchia, 2015).

An official definition of energy poverty was included in the national energy strategy for Italy in 2017 (OIPE, 2019; Jessoula and Mandelli, 2019).¹¹ This definition follows the "low income/high cost" indicator proposed by Faiella and Lavecchia (2015), according to which a household is identified as energy-poor when at least one of the following conditions holds:

- i. the equivalised spending on energy services is more than double the mean level of spending, and total spending (net of spending on energy) is below the relative poverty threshold;
- ii. total equivalised household spending is below the median of national spending, and the household has zero spending on heating (this condition allows researchers to capture hidden energy poverty, which is mostly related to a lack of adequate technologies).

According to this criterion, 2.2 million households were energy-poor in 2017, and the incidence of energy poverty was 8.7% (0.1 percentage points more than in 2016). However, the OIPE only refers to objective poverty (measured following a relative approach),¹² while no emphasis is placed on subjective indicators that are instead often considered at the EU level to assess – according to a multidimensional approach – the extent and the characteristics of energy poverty and vulnerability.

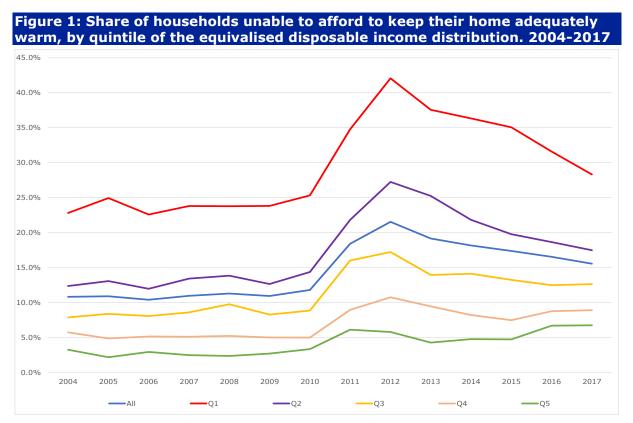
As shown in Figure 1, according to 2017 EU-SILC data, Italy had the third highest share among the EU-15 countries of households reporting being unable to afford to keep their home adequately warm (15.6%). This share has fallen in recent years, after a sudden increase in 2011 (from values around 10% in the period 2004-2010) and a peak in 2012 (21.5%). Confirming that energy poverty is clearly associated with income poverty, the share of households unable to keep their home adequately warm largely varied significantly by income quintiles: it was 28.3% and 6.7% for households belonging to the bottom and top quintiles, respectively (Figure 1). However, energy poverty does not merely overlap with income poverty. In recent years, the incidence of households unable to keep their home adequately warm fell for the bottom quintiles and rose for the top quintiles. As a consequence, the ratio between the incidence of this risk for households in the top and bottom quintiles fell from 11.5:1 in 2005 to 4.2:1 in 2017.

In recent years, the (slow) recovery of the Italian economy, though weak in comparative terms, contributed to reducing the values of the subjective indicators of energy vulnerability. Beyond the aforementioned falling trend in the incidence of households' inability to adequately heat their home, the share of households in arrears on the payment of utility bills fell from 12.6% in 2015 to 4.8% in 2017, and the share of

¹¹ To assess energy poverty and design effective policies to deal with this issue, following the establishment of the EU Energy Poverty Observatory, the Italian Observatory on Energy Poverty (OIPE) was constituted in February 2019. Researchers from various universities and institutions (e.g. Agenzia nazionale per le nuove tecnologie, l'energia e lo sviluppo economico sostenibile – ENEA, Bank of Italy) participate in the OIPE.

¹² Data needed for measuring, through an absolute approach, the energy quantity needed to provide adequate heating to a household are not available in Italy.

households living in dwellings with problems of humidity and heat insulation fell from 25% in 2014 to 16.1% in 2017 (Fondazione Di Vittorio, 2018). No clear explanation for the slightly rising trend in the share of households in the top income quintiles unable to afford to keep their home adequately warm has been provided so far.



Source: Elaborations on EU-SILC data.

3.2 Barriers for low-income people

As pointed out by the Vulnerable Consumer Working Group established by the European Commission,¹³ limits on access to energy services depend on the interaction between four factors: i) market characteristics, affecting energy prices; ii) household features (income, health, access to adequate technologies); iii) dwelling conditions, affecting the technological endowment and its energy efficiency; and iv) the climate and the social environment of the area of residence. Hence, access by low-income people to energy services may be constrained by barriers related to each factor. To deal with energy poverty, three (complementary) sets of measures are therefore relevant (OIPE, 2019): i) improving energy efficiency; ii) reducing prices for consumers; and iii) sustaining household income.

As concerns the energy efficiency of dwellings, it should be noted that – according to the 2011 Census – more than 60% of Italian residential buildings were built before 1976, when the first Law on energy saving was issued (Law 373/1976). Consequently, in most cases, these buildings have rather limited energy efficiency.

Furthermore, there is a positive correlation between household income and willingness to pay for upgrading the energy efficiency of dwellings. As a result, low-income households tend to pay for a relatively higher level of energy consumption. Since 2013, generous tax deductions have existed for energy upgrading (65% of the cost, repayable over 10 years), and less generous tax exemptions had been in place since 2007. Since 2018, to favour the energy upgrading of poor households that do not pay enough income tax to fully benefit from the tax deduction, those who come within the no-tax area receive a tax credit ("ecobonus") that can be given to the supplying firms or to banks and financial institutions. However, despite the generosity of these measures, low-income households rarely benefit from the opportunity to improve the energy efficiency of their dwelling, because of the frequently restrictive income criteria and the difficulty of obtaining credit from banks. Furthermore, specific problems concern those who live in rented accommodation, since, usually, the owners do not consider it convenient to spend money on energy efficiency (especially when the rent amount is not very high); and the tenants might not expect to live in the dwelling for enough time to make investment in energy upgrading worthwhile.

As concerns prices, electricity and gas prices have increased more than the inflation rate in recent years. More precisely, electricity and gas prices rose by 35% and 23%, respectively, from 2008 to 2017, while the consumer price index rose by 11% in the same period. The increase in energy prices was mostly due to the need to finance the transition towards renewable sources. The OIPE (2019) recently estimated that around 25% of the final energy price was related to financing renewables, while the corresponding share was 8% in 2009.

The increase in energy prices has not been matched by a reduction in energy consumption, clearly confirming that household demand for energy is rather inelastic in relation to price. Therefore, the share of energy spending in total household spending increased from 4.7% to 5.1% in the period 2007-2017, and this increase mostly penalised low-income households. As a result, in relative terms, the energy vulnerability of low-income households increased over the decade in question (OIPE, 2019): the share of spending on energy services in the total spending of households in the bottom income quintile increased by 0.5 percentage points between 2007 and 2017 (from 6.0% to 6.5%) – whereas this ratio remained relatively constant for top-quintile households. Moreover, households in the bottom income decile ended the period spending approximately 8% of their total spending on electricity and gas, while the corresponding share for those in the top decile was approximately 3.5%.

¹³ See <u>https://ec.europa.eu/energy/en/content/meetings-and-documents-related-vulnerable-consumer-</u> working-group-2012-%E2%80%93-2016.

Against this background, specific measures to ease the payment of energy bills – namely, the electricity and gas bonuses presented in Section 1.3.3 – are not enough to protect low-income households from energy poverty risks, partly due to the limited amount of the bonuses (which cover approximately 15% of the annual energy bill).

Income support for poor households – such as the Citizenship Income introduced in 2019 – may mitigate energy vulnerability, in addition to which recipients of the Citizenship Income are entitled to receive energy bonuses. However, it cannot be taken for granted that low-income households, having in most cases severe liquidity constraints, will use the minimum-income benefit to pay their energy bills or, even less likely, to invest in energy upgrading.

Furthermore, it should be noted that the take-up of energy bonuses is rather low in Italy, since some estimates show that only approximately 34% and 27% of households which satisfy ISEE requirements actually apply for the electricity bonus and the gas bonus, respectively (Fondazione Di Vittorio, 2019). The low take-up rate is likely to be related to a lack of information as well as to the fact that a non-negligible share of income-poor households are not entitled to receive the benefit due to the type of technical equipment in their dwelling. The gas bonus is only provided to households whose dwelling uses methane gas, whereas in some areas of Italy (e.g. Sardinia) methane gas is not available; and, furthermore, a non-negligible share of households – often the poorest – either use other types of fuel to heat their house (e.g. electricity, pellets, wood, carbon) or have no heating systems at all.

3.3 Inequality in access within the low-income population

As pointed out above, among low-income people, those who do not use methane gas to heat their house are clearly disadvantaged since they are not entitled to the gas bonus. Furthermore, as mentioned, tenants have much less opportunity to upgrade the energy efficiency of their dwelling. Further inequalities within households at risk of energy poverty may arise from the fact that benefits for energy costs (i.e. electricity and gas bonuses) are based on household economic conditions only, as captured by the ISEE. However, according to Fondazione Di Vittorio (2018), referring to a monetary indicator in order to protect individuals against energy poverty risks being ineffective since, apart from low income, energy poverty also depends on non-monetary dimensions such as the type of dwelling and the climatic conditions where individuals live. In other words, the sole reference to a household's ISEE may not allow energy-poor people to be accurately identified.

The OIPE (2019) used multivariate regressions to analyse the main correlates of energy poverty risks, as measured by the low income/high cost indicator. The results showed that the incidence of such risks, as expected, was higher for individuals in disadvantaged economic conditions (e.g. the poor, low-educated individuals and the unemployed), but it was also higher for those living in small municipalities and in southern regions. Consistently, computations based on EU-SILC 2017 among households belonging to the bottom quintile of equivalised disposable income show that the share of households unable to afford to keep their home adequately warm was much higher in the south (35.9%) and in the islands (32.1%) than in other areas (25.3% in the north-west, 15.8% in the north-east and 21.6% in the centre).

3.4 Evidence of effects of lack of access to energy services on the overall social inclusion of low-income people

The European Energy Poverty Observatory argues that energy poverty may engender serious negative consequences for individuals' health and wellbeing, stating, for instance, that respiratory and cardiac illnesses and mental health problems are exacerbated by low temperatures in the house and by the stress associated with unaffordable energy bills.¹⁴

There is a shared agreement on the likelihood that energy poverty may trigger physical and psychological illnesses, as well as fostering social exclusion – especially among the elderly (who suffer the most from low temperatures during winter, and increasingly high temperatures during summer): despite this, to the best of our knowledge no detailed study analysing the causal effects of lack of adequate access to energy services on individuals' health and social exclusion has been carried out in Italy.

Nevertheless, without trying to infer causal relationships, Fondazione Di Vittorio (2018) carried out a survey of perceptions of the risks associated with access to energy based on a sample of pensioners. The results were quite interesting, since the share who considered the temperature in their dwelling as a driver of their health status was 52% among those who could be considered energy-poor, whereas it fell to approximately 13% among those who were not energy-poor.¹⁵ Consistent with this, 62% of energy-poor pensioners reported living in a dwelling with an inadequate temperature, while the corresponding share was 16% among non-poor pensioners. Finally, energy poverty was also associated with sensitiveness to issues related to the environment and climate change: the share of respondents reporting that environmental protection should be a policy priority was 86.8% and 68.5% among non-energy-poor and energy-poor pensioners, respectively.

¹⁴ See <u>https://www.energypoverty.eu/about/what-energy-poverty</u>.

¹⁵ The Fondazione Di Vittorio identified as energy-poor those individuals who fulfilled at least one of the following criteria: i) were recipients of electricity or gas bonuses; ii) had equivalised annual incomes below €10,000; iii) reported not to be able to satisfy their primary needs; and iv) benefited from social assistance allowances.

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Annex

Table A1: Essential service – Water

1) Definition of "low income" used in the context of the delivery of the service in the country: $^{\rm 16}$

Low income is defined in 2020 based on the annual ISEE value and according to the following three conditions:

- a) an annual ISEE not higher than €8,256
- b) an annual ISEE not higher than €20,000 for households with at least four minors
- c) being a recipient of the Citizenship Income and with an annual ISEE not higher than €8,256.
- 2) Measures aimed at facilitating access for low-income people to water (for hygiene purposes, to cook...) in the country:

		Subnational		
	National (*)	Regional (only if <i>no</i> for national) (**)	Local (only if <i>no</i> for national) (**)	
Reduced tariffs	No	No	No	
Cash benefits	No	No	No	
In-kind benefits	Yes			
Advice/training or information services	No	No	No	
Provision of a basic/uninterrupted basic supply	Yes			

(*) For each measure: Does the measure exist in the country at national level ("Yes"/"No")?

¹⁶ **National definition** used in this context (most frequently used definition if there is more than one definition). *Only if* there is no national definition *and if* the service is organised at subnational level, most common definition used in this context at regional (if any) or local (if any) level.

Table A2: Essential service – Sanitation

1) Definition of "low income" used in the context of the delivery of the service in the country:¹⁷

The definition of low-income households entitled to pay the reduced tariff for the waste tax will be detailed in the next few months. However, the requirements should be the same as those applied to energy services. Hence, low income would be defined in 2020 based on the annual ISEE value and according to the following three conditions:

- a) an annual ISEE not higher than €8,256
- b) an annual ISEE not higher than €20,000 for households with at least four minors
- c) being a recipient of the Citizenship Income
- 2) Measures aimed at facilitating access for low-income people to sanitation (i.e. systems for taking dirty water and other waste products away from dwellings in order to protect people's health) in the country:

		Subnational		
	National (*)	Regional (only if <i>no</i> for national) (**)	Local (only if <i>no</i> for national) (**)	
Reduced tariffs	Yes			
Cash benefits	No	No	No	
In-kind benefits	No	No	No	
Advice/training or information services	No	No	No	

(*) For each measure: Does the measure exist in the country at national level ("Yes"/"No")?

¹⁷ **National definition** used in this context (most frequently used definition if there is more than one definition). *Only if* there is no national definition *and if* the service is organised at subnational level, most common definition used in this context at regional (if any) or local (if any) level.

1) Definition of "low income" used in the context of the delivery of the service in the country:¹⁸

For both electricity and gas services, low income is defined in 2020 based on the annual ISEE value and according to the following three conditions:

- a) an annual ISEE not higher than €8,256
- b) an annual ISEE not higher than €20,000 for households with at least four minors
- c) being a recipient of the Citizenship Income
- 2) Measures aimed at facilitating access for low-income people to energy (to light dwellings, heat or cool dwellings, use home appliances) in the country:

		Subnational		
	National (*)	Regional (only if <i>no</i> for national) (**)	Local (only if <i>no</i> for national) (**)	
Reduced tariffs	Yes			
Cash benefits	No	No	No	
In-kind benefits	No	No	No	
Advice/training or information services	No	No	No	
Provision of a basic/uninterrupted basic supply	No	No	No	

(*) For each measure: Does the measure exist in the country at national level ("Yes"/"No")?

¹⁸ **National definition** used in this context (most frequently used definition if there is more than one definition). *Only if* there is no national definition *and if* the service is organised at subnational level, most common definition used in this context at regional (if any) or local (if any) level.

Table A4: Essential service – Public transport

1) Definition of "low income" used in the context of the delivery of the service in the country:¹⁹

There is no national definition of low income, since the public transport service is organised at the regional level. Furthermore, regions do not apply the same rules for defining low-income households. The regional definition of low-income households is based on the ISEE indicator, but the ISEE thresholds for being entitled to benefit from regional reduced tariffs largely differ across regions.

2) Measures aimed at facilitating access for low-income people to public transport in the country:

		Subnational		
	National (*)	Regional (only if <i>no</i> for national) (**)	Local (only if <i>no</i> for national) (**)	
Reduced tariffs	No	Yes-most	No	
Cash benefits	No	No	No	
In-kind benefits	No	No	No	
Advice/training or information services	No	No	No	

(*) For each measure: Does the measure exist in the country at national level ("Yes"/"No")?

¹⁹ **National definition** used in this context (most frequently used definition if there is more than one definition). *Only if* there is no national definition *and if* the service is organised at subnational level, most common definition used in this context at regional (if any) or local (if any) level.

Table A5: Essential service – Digital public services

1) Definition of "low income" used in the context of the delivery of the service in the country:²⁰

To be entitled to pay the reduced fee for phone and internet services needed for access to digital public access, individuals must have an annual ISEE no higher than & 8,256.

 Measures aimed at facilitating access for low-income people to digital public services (e.g. digital post, digital fiscal services, digital social security services, digital healthcare appointments) in the country:

		Subnational		
	National (*)	Regional (only if <i>no</i> for national) (**)	Local (only if <i>no</i> for national) (**)	
Reduced tariffs	Yes			
Cash benefits	No	No	No	
In-kind benefits	No	No	No	
Advice/training or information services	No	No	No	
Provision of a basic/uninterrupted basic supply	No	No	No	

(*) For each measure: Does the measure exist in the country at national level ("Yes"/"No")?

²⁰ **National definition** used in this context (most frequently used definition if there is more than one definition). **Only if** there is no national definition **and if** the service is organised at subnational level, most common definition used in this context at regional (if any) or local (if any) level.

Table B1: Essential services – Summary table

- 1) Measures aimed at facilitating access for low-income people to the different services that exist at national, regional and/or local level in the country
- 2) Broader policy framework under which all or some of these measures are organised in the country
- Ongoing or announced reforms of the measures and/or related frameworks aimed at (further) enhancing effective access to the service for low-income people in the country

	1. Measures (NAT, SUBNAT,	2. Policy framework (**)		3. Ongoing or planned
	BOTH, NONE)	National	Subnational	reforms
	(*)	(Yes/No)	(Yes/No)	(Yes/No)
Access to water	NAT	Yes		Yes
Access to sanitation	NAT	Yes		Yes
Access to energy	NAT	Yes		Yes
Access to public transport	SUBNAT	No	Yes	No
Access to digital public services	NAT	Yes		No
Access to basic financial services (***)	Not applicable	Yes		No

(*) This column summarises the response provided in Tables A1-A5 above. "NAT" means that all the measures that exist in favour of low-income people are national measures; "SUBNAT" means that there are no national measures but some of/all the measures that exist are subnational measures; BOTH means a mix of NAT and SUBNAT; "NONE" means that there are no measures, be it at national or subnational level.

(**) Is there a broader national policy framework under which all or some of these measures are organised in the country for some of/all the services under scrutiny ("Yes"/"No")? **Only if** there is no such national framework for one service **and if** the service is organised at subnational level: Is there a broader subnational policy framework under which all or some of these measures are organised for this service ("Yes"/"No")?

(***) Open and use payment accounts with basic features (Directive 2014/92/EU).

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