



Submission from European Youth Forum: **Recommendations for a youth-inclusive European Pillar of Social Rights Action Plan**

About the European Youth Forum

The European Youth Forum is the leading platform of youth organisations in Europe fighting for youth rights. We represent over 100 youth organisations, which bring together tens of millions of young people from all over Europe. The following submission is the result of our existing research and policy positions developed in consultation with young people across Europe and adopted by our Member Organisations.

Background

Youth and Social Rights

Young people in Europe today face significant challenges in attaining their social rights. In the EU, over one in every four young people are at risk of poverty and social exclusion¹. Youth unemployment is more than double the overall unemployment rate². Non-standard forms of work and in-work poverty are on the rise among youth and transitions from education to employment have become increasingly challenging as young people seemed to be caught in a cycle of internships, temporary, or unpaid work. These challenges to young people's financial security are exacerbated by the fact that age-based discrimination and eligibility requirements in social protection mechanisms often exclude youth. Moreover, young people's right to housing is continually under threat, affecting their transition to autonomy. Equal access to education is not a reality across Europe today despite the right to education being enshrined in many human rights frameworks at European and international level. Health services are too far from young people's needs and everyday reality.

Many of these challenges are a legacy of the 2008 financial and economic crisis and the subsequent austerity measures implemented by the EU and its Member States. These barriers are further exacerbated by emerging issues. Megatrends such as globalisation, climate change, technological advancements and demographic changes are changing the world of work and creating new challenges. The unprecedented COVID-19 pandemic is also raising serious concerns about the long term prospects for young people and rapidly exacerbating youth precarity and poverty.

In this context, ensuring an implementation of the European Pillar of Social Rights that is youth-inclusive is fundamental.

¹ Eurostat (2019) [At risk of poverty or social exclusion rate](#)

² Eurostat (2020) [September 2020 Unemployment rate](#)



Overarching points / methodology

All principles are equal

The approach of the EU and its Member States to social inclusion has often been focused on tackling issues around (un)employment, rather than eliminating poverty and social exclusion for all. While the proclamation of the Pillar was meant to revive Social Europe and reinforce social rights, its implementation has fallen short of expectations. Most of the measures put forth by the European Commission for the implementation of the Pillar have a strong link to employment. For example, the Recommendation on Access to Social Protection aims to improve access to social protection for workers and the self-employed, without tackling gaps in social welfare for those who cannot find work or who are unable to work.

While access to quality employment is crucial in the fight against poverty, ensuring that all Europeans are able to access their social rights regardless of their employment status is the only way to foster a truly social Europe. This is particularly important at a time like this, with the COVID-19 pandemic and subsequent lockdowns severely impacting the labour market. The Pillar and its twenty principles already offer the opportunity to go beyond the focus on employment, but for this to happen, the Action Plan must give equal priority to all the principles.

Furthermore, recognising the interlinkages between different social rights and their impacts on poverty and social exclusion (e.g.: the impact of education on employment outcomes; housing security on health, etc), the principles of the Pillar must not be treated hierarchically. This means that the European Commission should include indicators and proposals for legislative or other instruments for every single principle.

Mainstreaming youth in all policies

While youth-specific policies such as the reinforcement of the Youth Guarantee, in line with Principle 4 of the Pillar, are welcome, they have not been enough to tackle the scale of youth poverty and social exclusion. There has been a missed opportunity thus far to improve young people's access to social rights by failing to mainstream youth and youth rights in all legislative and non-legislative proposals. For example, the Work-Life Balance Directive failed to take into consideration the specific challenges that young parents and carers face, and the kind of support they need for their continued inclusion into society and the labour market. Similarly, the Recommendation on Access to Social Protection and the Directive on Transparent and Predictable Working Conditions have large gaps when it comes to applying them to the forms of employment or situations faced by young people, and those transitioning from education to employment in particular. This leads to a divergence where employment and social legislation increases protection for the rest of the population whilst leaving young people behind.



Too often young people are excluded from social protection measures because of their age or lack of work history. Employment policies in many Member States also discriminate against young people, either through youth minimum wage laws, or a lack of regulations to guarantee the quality of jobs and training taken up primarily by young people (such as apprenticeships and internships).

The impact of excluding young people from protections provided to others in society puts them at greater risk of social exclusion just as they undergo the important transition from school to work, and to independence.

As young people are not necessarily recognised as rights holders, youth does not always get the visibility it deserves in policies and legislation. When it comes to tackling the challenges faced by youth, the approach is often short-sighted. Instead of coming up with long-term solutions to ensure that youth rights are protected, respected and fulfilled, policies tend to focus on addressing short-term needs. The result is that, rather than tackling the root causes of young people's exclusion from society, youth policy measures are often merely reactive rather than proactive tools. This Action Plan is an opportunity to make sure that all policies measures planned to implement the Pillar include a youth perspective, are conducive to tackling age-based discrimination, and protect young people and their rights.

To achieve this, the Action Plan should include a rights-based approach to youth, which encompass also those measures that are not specifically aimed at young people, but will impact on them.

Measuring Success: Headline targets and timelines

The Action Plan on the Pillar should include the following headline targets and sub-indicators to be achieved by 2030:

- Reduction of the at risk of poverty or social exclusion rate by 50%.
 - Sub-indicator: Reduction of the at risk of poverty or social exclusion rate of young people (age 15 - 29) by 50%.
- Reduction of the youth (age 15-29) not in employment, education or training (NEET) rate by 50%.
- Reduction of the proportion of workers on temporary contracts by 50%.
 - Sub-indicator: Reduction of the proportion of young workers (age 15 - 29) on temporary contracts by 50%.

The inclusion of headline targets, as used in the Europe 2020 Strategy, would symbolise a clear political commitment at EU level to implement the principles of the Pillar and to demonstrate concretely what impact it will have on European citizens. A clear timeline for the achievement of targets should form the basis of the Action Plan. This timeline should include points at which progress will be formally and collectively measured at EU level. In cases where targets are not on track, the Action Plan should include a strategy



on how it will respond and renew efforts to attempt to get back on track to achieve them.

Following the failure to meet the Europe 2020 target on poverty, a new headline target on reducing poverty based on a percentage decrease is essential to build momentum on actions to improve the material and social wellbeing of all European citizens. Young people are one of the groups most affected by non-standard work and poverty. The EU at risk of poverty or social exclusion rate for young people (aged 15 - 29) was 25.5% in 2019 compared to 21.1% for the total population³.

Given the challenges that young people face in particular, in addition to the fact that young people are being disproportionately affected by the social and economic impacts of the pandemic, it will be crucial to include a headline target on reducing the proportion of young people with NEET status. This will also help to encourage momentum on the implementation of the Reinforced Youth Guarantee, and align with the SDGs which include an indicator on the youth NEET rate.

It is imperative to ensure that the elements of the Action Plan referring to employment focus on the quality of work. We suggest the inclusion of a target on reducing the proportion of workers on temporary contracts, which have become increasingly common and contribute to growing precariousness for many. Non-standard forms of work tend to provide lower wages, less access to social protection, less likelihood of receiving training. Moreover, the insecurity of temporary work has been shown to impact negatively on people's mental health. The proportion of young employees (aged 15 - 24) working on a temporary contract was 49.5% in 2019 compared to 14.9% for the total working population⁴.

There are certain groups who face greater risk of poverty or low quality employment, such as migrants, people with disabilities and many others. As youth is not a homogeneous group and age intersects with other personal characteristics (gender; socio-economic background; religion; ethnicity; sexual orientation; etc.), young people are often at risk of suffering multiple discrimination and facing multiple barriers to accessing their rights.⁵ In the context of the implementation of the Pillar, these are elements that should be taken into account. Therefore, it is essential that every headline indicator is disaggregated by age, gender and other categories to demonstrate the extent to which more vulnerable groups have been reached.

As outlined above, all the principles of the Pillar are important and the indicators used as headline targets and for monitoring should reflect that. However, many of the principles of the Pillar are not yet included in the Social Scoreboard, in particular those from Chapter 3 of the Pillar 'Social Protection and Inclusion' such as housing and assistance

³ Eurostat (2019) [At risk of poverty or social exclusion rate](#)

⁴ Eurostat (2019) [Youth Employment Data](#).

⁵ European Youth Forum (2012) [Policy Paper on Youth Rights](#); and European Youth Forum (2020) [global youth movement #ForYouthRights: challenges and next steps](#)



for the homeless (which could be measured with the ETHOS⁶ framework), the inclusion of people with disabilities, and access to essential services. These principles should be recognised as essential for promoting social inclusion by including them in the Social Scoreboard and through a headline target on access to social protection and services in the Pillar Action Plan, which will be important to ensure that the Action Plan does not place employment above the other chapters of the Pillar.

The European Commission should also take into consideration additional tools to measure progress. The implementation of the Pillar and its impact towards building a fairer and more social Europe could be monitored by ensuring a greater focus on social and environmental indicators. As demonstrated by the Youth Progress Index⁷, which is based on the methodology of the Social Progress Index⁸, economic and income indicators alone are not sufficient to provide a picture, as they do not provide a thorough understanding of the extent to which basic needs are met, wellbeing is safeguarded, and opportunities are provided.

Applied to the implementation of the Pillar, the Social Progress Index methodology would complement economic indicators and headline targets currently included in the Social Scoreboard, by allowing for an independent assessment of the relationship between economic performance and social progress. This would help build an understanding of the effects of economic measures on different social rights, which, in turn, could guide policy priorities and implementation, particularly in the context of the European Semester and the use of COVID-19 recovery instruments such as the Recovery and Resilience Facility.

Collection of Data

Data is invaluable in understanding where gaps and needs exist. While data on employment, NEETs or precarious work is readily available, when it comes to social rights more broadly too often data, especially youth-specific data, is lacking or not up-to-date. This once again highlights an approach excessively focused on employment, rather than on social exclusion. In line with our belief that all principles are and should be treated by the European Commission equally, it is fundamental that data linked to these issues be given equal importance. Social indicators such as housing conditions, job quality, income and gender equality, and quality of life factors like health, knowledge and skills are fundamental for achieving Social Europe.

Given the level of challenges Europe youth are facing, more data is vital to contribute towards impactful, evidence-based policy-making for the vulnerable. As noted above, given that youth are not a homogeneous group, it is also necessary for this data to be disaggregated to better understand the needs of marginalised groups such as young

⁶ FEANTSA (2017) [ETHOS - European Typology on Homelessness and Housing Exclusion](#).

⁷ European Youth Forum (2017) [Youth Progress Index](#).

⁸ Social Progress Imperative (2020) [Social Progress Index](#).



people with disabilities, young women and girls, young refugees and migrants, and ethnic and racial minorities including Roma.

Data can be a huge source of power and influence towards social progress and combating poverty and social exclusion. With relevant, reliable data collected, we can provide opportunities for Member States to share good practices, and assess the success of policy and public investment over time.

Economic Governance and synergy with the SDGs and Green Deal

It is clear that different policy fields interlink with each other in important ways, and it will be crucial that the Pillar Action Plan recognises this and includes clear synergies with the EU's other key initiatives, as well as the broader framework of the SDGs.

There should be an overarching Sustainable Development Strategy for the implementation of the 2030 Agenda for Sustainable Development. A comprehensive Sustainable Development Strategy needs to integrate the three dimensions of sustainable development at the highest level, and include the Pillar Action Plan in addition to other key policies, in particular the Green Deal.

The social dimension should also be strengthened within the Green Deal and economic governance of the EU. Whilst the Just Transition Fund is a step forwards towards ensuring the green transition works for people, social support (such as up- and re-skilling, job search assistance and active inclusion of job seekers) is only a small part of the larger package.

Sufficient fiscal space is key to implement the Pillar Action Plan and allow Member States to move forward on progressive social policies. The economic governance of the EU which regulates budget deficits and public debt levels through the Stability and Growth Pact and the European Semester has been criticised for its role in promoting austerity measures which have entrenched poverty for many, and undermined social and workers' rights - for example by increasing pension ages and depressing wages. The review of the EU's economic governance should be an opportunity to improve mechanisms for assessing the social impacts of the EU's economic governance and to strengthen the protection for social investment. In particular, we should aim to increase its flexibility and democratic oversight to ensure that the public investments needed to address the massive social and environmental challenges are not undermined by rigid and outdated rules.

The European Semester

To support the implementation of the Pillar and to effectively guide the use of the European Social Fund Plus (ESF+) and Next Generation EU funds, the social dimension of the Semester should be strengthened. The dominant focus on macroeconomic goals in the Semester risks undermining progress on the Pillar, which has often led to recommendations on cuts and efficiency measures to public services and social



protection systems. To counteract this, social policy must be given an equal footing in the analysis and recommendations issued by the Commission, for example by ensuring at least one social country-specific recommendation per country and by ensuring coherence between social and economic analysis and recommendations. The social dimension of the Semester must also ensure that all principles of the Pillar are covered and not simply those related to employment.

Furthermore, Civil Society Organisations (CSOs) who work with and represent European citizens, often the most vulnerable, should be more meaningfully involved in the European Semester process at European and national level. They play a crucial role in representing European citizens and in ensuring that governments are making progress on social rights.

Funding

The ESF+ and the Next Generation EU funds are important for the implementation of the Pillar principles, and as announced in the Communication on Youth Employment Support from the European Commission, the EU aims to invest at least €22bn in support for young people's access to employment.

However, maintaining and increasing the total size of the ESF+ is necessary in a context of high rates of poverty and social exclusion in the EU. Furthermore, youth unemployment rates are twice as high as for the general working population, and the ILO and Eurofound have found that €45 - €50bn per year is needed to reach all young people with NEET status⁹. Therefore, the EU should continue in the future to raise its ambition with regards to the amount of investment provided to support young people in order to reach the level of investment outlined by the ILO and Eurofound.

Local and national partnerships with Civil Society should be strengthened in the management of EU funds. CSOs, such as youth organisations, work directly with or represent people who are often the target of EU funds and can contribute their expertise to enhance the effectiveness of the programmes.

Projects that support young people should focus on providing quality employment opportunities, with conditions excluding precarious jobs such as unpaid internships, and eligibility criteria for employers to prevent abusive practices. The scope of ESF+ projects should also be expanded further beyond employment to cover other important dimensions necessary for supporting a young person such as access to housing and mental health services.

⁹ ILO (2015) [The Youth Guarantee programme in Europe: Features, implementation and challenges](#)

Eurofound (2015) [Social inclusion of young people](#)



The Participation of Civil Society

It is fundamental that the Action Plan recognises the contribution that civil society can make towards access to social rights by putting them on par with social partners. This means consulting and engaging in dialogue with them at all stages of policy processes, at the EU, national, regional and local level. CSOs not only have a unique acquis to contribute, but they also have a proven track record of reaching those that the social partners and the state do not. Yet civil society organisations continue to struggle to engage meaningfully and consistently, particularly at the national level where decision-makers should do more to provide opportunities for CSOs to be involved in policy-making.

To support youth organisations in particular, the European Commission should support measures to improve their participation in the Member States, when it comes to EU policy processes linked to social rights. Furthermore, providing sources of sustainable funding to youth organisations and greater information sharing that helps to build their capacities would support their meaningful engagement in these processes. In order to ensure that no one is left behind, the EU and Member States must ensure that these discussions include CSOs working with vulnerable groups like youth organisations, as well as the most marginalised, such as people with disabilities, Roma, or refugees and migrants.

Recommendations for the Principles

Principle 1. Education, training and life-long learning

The Pillar Action Plan should include measures to ensure that equal access to education is guaranteed across the EU. Access to lifelong learning should be recognised as a core element of fulfilling the right to education. To ensure that all young people can benefit from lifelong learning, governments and institutions must invest in quality and inclusive education systems. This includes investing in individualised, targeted support for more vulnerable groups of young people as well as better recognising non-formal education (NFE) and youth work and NFE and youth work providers such as youth organisations as crucial actors in providing innovative and flexible education among people at risk of social exclusion.

Vocational education, training and apprenticeships can also be great opportunities to help young people acquire new skills. They allow a space for practical learning and can help young people increase their employability. Currently, however, vocational education and training is still too often stigmatised and lacks the same recognition as education in upper secondary schools and higher education institutions.

Moreover, apprenticeships and internships which provide work-based learning often lack quality educational content and undermine young people's social and employment



rights. More systematic and efficient monitoring of internships and apprenticeship national regulations should be ensured at European level, in addition to promoting greater monitoring and compliance of existing regulations at national level. The European Youth Forum's European Quality Charter for Internships and Apprenticeships¹⁰ should be used as a basis for advancing legislation that ensures minimum quality standards for internships and apprenticeships at EU level. This should take the form of a new legally binding instrument which strengthens the principles of the Recommendation on a Quality Framework for Traineeships and addresses its main shortcomings, in particular by guaranteeing fair remuneration and access to social protection for trainees and interns.

We also call on the EU to establish paid educational leave policies in line with the ILO Paid Educational Leave Convention that allow young workers to attend training programmes during work hours and at no personal cost.

The European Commission should use the European Semester to support structural reforms to improve education policy, using EU funding and EU investment instruments to fund education and set a benchmark for Member States to invest at least 6% of their GDP in education. EU level investment in education and training needs to be seen as complementary to Member States' investments.

In the context of an increasing digitalised world, digital skills and access to ICTs (Information and Communications Technology) have become vital components to young people's access to their social rights. Many social services have become digitalised and the current pandemic has hastened the need to address Europe's gaps in digital skills as access to education, training, and life-long learning and employment have had to move almost entirely into the digital sphere. As such, the Digital Education 2021-2027 Action Plan and the implementation of Principle 1 should go hand in hand. A particular focus on young women and girls, who lag behind their male peers in terms of acquiring digital skills and in taking on STEM subjects is also necessary. Furthermore, policy measures aimed at improving digital skills should seek to support young people such as those with disabilities, rural youth, and the poor who report the lowest levels of digital literacy.¹¹ Non-formal educators and youth organisations can play a crucial role in helping to reach these groups through digital youth work, but this requires greater recognition and funding to support these initiatives.

Principle 3. Equal opportunities

Ageism is less commonly known as a form of discrimination compared to others. It is often based on perceptions and attitudes towards young people, exposing young people to discrimination and inequality, with a negative impact both on individuals and society as a whole. While EU founding treaties mention combating age-based

¹⁰ European Youth Forum (2020) [European Quality Charter on Internships and Apprenticeships](#)

¹¹ European Youth Forum (2019) [The Future of Work and Youth](#).



discrimination, when it comes to EU legislation, age has attracted less attention compared to other grounds for discrimination (e.g. race, gender, disability, religion and belief, and sexual orientation): in fact, at EU level, there is no legal protection against age-based discrimination beyond employment.¹²

A thorough implementation of the Pillar could help fill current gaps in protection. This would mean not only mainstreaming youth rights in all legislative and non-legislative initiatives to implement the 20 principles, but also unblocking the negotiations for, or proposing an alternative to, the long-halted EU Equal Treatment Directive.

Additionally, EU equality law could be reviewed to explicitly include age-based discrimination in the mandate of equality bodies, going beyond the current focus on gender and race.

Principle 4. Active support to employment

The EU's Youth Guarantee reaches millions of young people every year and plays a crucial role in supporting young people's school to work transition.

The 2020 reinforcement of the scheme made several important and positive changes. Nevertheless, two key issues must still be addressed to ensure the effectiveness of the scheme. The first is the quality of offers, and the second is the implementation of meaningful partnerships.

A quality framework should be introduced to define minimum quality standards for offers provided under the Youth Guarantee, in particular by ensuring employment offers provide long-term security, social protection and decent working conditions. Implementation of these standards can be supported by collecting data specifically on the types of offers received by young people, and by linking EU funds to binding quality criteria that prevents abuses of Youth Guarantee schemes by employers. An EU-level quality framework for offers under the Youth Guarantee could be based on the quality standards that the European Youth Forum has identified through a consultation process with youth and civil society organisations¹³. Many young people are employed in non-standard forms of work which often hinder their school-to-work transition, improving the offers provided under the Youth Guarantee can play an important role in driving the creation of better quality opportunities for young people.

Structures and protocols for meaningful partnerships with civil society organisations (particularly youth organisations and organisations representing or working with vulnerable young people) should be developed at local, national and European levels. Partnerships with stakeholders for managing the Youth Guarantee should clearly outline

¹² European Youth Forum (2016) [Policy Paper on Equality and Non-Discrimination](#).

¹³ European Youth Forum (2020) [Quality Standards for the Youth Guarantee](#)



the role of each stakeholder, provide adequate funding for their role if necessary, ensure regular and timely discussions to take stock of progress, and ensure all relevant information is shared in a transparent way to partners.

Principle 6. Wages

Young people are more likely than any other age group to be receiving the minimum wage, with one in four workers aged 20 - 25 being minimum wage earners¹⁴. Despite the aims of youth minimum wages to incentivise job opportunities for young people, research shows that it is an ineffective approach, and that in fact raising youth minimum wages has a negligible impact on youth employment levels¹⁵. Another argument for ending age discrimination in wages is that young people in the EU face a higher in-work poverty rate than the rest of the population¹⁶ and that therefore raising wage levels for young people can help to lift them out of poverty.

We call for the principle of equal pay for work of equal value to be fully respected and for age-based discrimination in access to minimum wages to be abolished. To achieve this, all Member States and EU institutions should take steps to abolish discriminatory practices against young people, starting with ensuring that the upcoming Directive on Adequate Minimum Wages clearly bans youth minimum wages.

Furthermore, the EU should seek to end minimum wage exemptions that unfairly target young people and the type of work that they undertake, such as internships and apprenticeships.

Principles 12. Social protection / 13. Unemployment benefits / 14. Minimum income

New and non-standard forms of work, primarily taken on by youth have had a significant impact on their access to social protection. The contributory nature of the EU's social protection systems is no longer compatible with the reality young people face when accessing the labour market. Across most EU countries, to receive unemployment benefits workers have to have contributed via employment for a minimum period of 12 months. This one-year period is extremely difficult to achieve for young people – who are likely to be either unemployed, or employed in non-standard work.

Young people often have to rely on 'restricted' unemployment benefits or 'minimum income schemes'. However, in some EU countries, these schemes are inaccessible for those under a certain age. An EU Framework Directive on Adequate Minimum Income would help to ensure equal access to minimum income schemes, and should remove discrimination based on age. We call for a definition of adequacy at the European level,

¹⁴ European Commission (2020) [Second phase consultation of Social Partners under Article 154 TFEU on a possible action addressing the challenges related to fair minimum wages](#)

¹⁵ ILO (2017) [Rising to the youth employment challenge: New evidence on key policy issues](#)

¹⁶ Eurostat (2019) [In-work at risk of poverty rate](#)



which ensures that the amount of income support received is actually enough to live a decent life.

Reforming contributory unemployment benefits is necessary to ensure benefits are accessible to all young people. The system needs to be adapted to job-starters' reality and to the proliferation of non-standard forms of employment by decreasing the minimum period of contributions needed to access unemployment benefits, and internship and apprenticeship contracts that give the opportunity to the young person to start contributing to the unemployment benefit system.

Finally, while we welcome the Recommendation on Access to Social Protection, as part of the implementation of the Pillar, the impact of the COVID-19 pandemic highlights the need for a legal instrument on adequate social protection for all types of workers, but also the unemployed and those who cannot work. The EU must shift from a welfare model focused on tackling unemployment to creating one that tackles poverty and social exclusion instead.

We also highlight the importance of the initiatives outlined in the Youth Employment Support Communication: the study on young people's access to social protection, and the Monitoring Framework on Access to Social Protection - these initiatives will provide much needed information on the extent to which young people are able to access social protection and can inform future policies.



Annex 1. European Youth Forum publications

Our contribution is based on the following reports and policy papers, which explore the topics outlined in this document further.

Reports:

- [Escaping the growth and jobs treadmill](#) (2020)
- [Quality Standards for the Youth Guarantee](#) (2020)
- [The Future of Work and Youth](#) (2019)
- [Youth Progress Index](#) (2017)
- [Excluding Youth: A threat to our Future](#) (2016)
- [European Quality Charter on Internships and Apprenticeships](#) (2011)

Policy Papers:

- [Policy Paper on the Future of Work and Youth](#) (2019)
- [Policy Paper on Sustainable Development](#) (2018)
- [Updated position on the Implementation of the Youth Guarantee](#) (2018)
- [An investment in Europe's Youth](#) (2018)
- [Resolution on Youth Autonomy and Social Exclusion](#) (2016)