

Building a comprehensive and participative strategy on homelessness

Institute for Social Security
Ministry of Labour and Social Solidarity

Introduction

The first National Strategy for Integration of Homeless People has been launched the 14th March 2009, in a public ceremony held by the Minister of Labour and Social Solidarity.

The strategy holds upon a rather tide homelessness definition but it enhances every local network (where local homelessness plans must be developed) to design their homelessness diagnosis and action plans within a more broad framework, including prevention, intervention and follow-up measures.

It holds on a rights-based approach, including the right to housing and equal opportunities as well as other basic rights.

The goals are framed upon two basis axes:

1. Information, education, combat against discrimination;
2. Qualification of intervention.

Special importance is given to the implementation of local diagnosis including risk indicators and local homelessness plans within the *social network programme*¹ and homelessness strategy's framework and to an integrated and client centred approach, with individual insertion contracts.

The "building" of this strategy was a participative process, including a large group of stakeholders, public and private organisations who signed up a public commitment with its goals. In fact, the designing of the Strategy was based upon a high level of motivation and development of different activities that reinforced a cooperative dynamics and a consequent integration of shared goals from the entities of the group.

We hope that the lessons learned from the drafting of Portugal's first national homeless strategy, along with the insights into governance issues and policy change gained throughout this process of will provide an opportunity for other countries to reflect and analyse their own national processes for framing and implementing new policy instruments.

The presentation and discussion of the Portuguese experience might have a great potential for dissemination, namely because its governance elements and stakeholders' commitment in the different phases of the strategy - designing, implementation, monitoring and evaluation.

¹ SNP is a programme to combat poverty and social exclusion and foster local social development (adopted territorialized strategic planning methodologies and aims at dynamising integrated support networks).

“The diverse range of actors involved in the drafting process of the homeless strategy in Portugal was gradually transformed into an active and complex network of individual and institutional stakeholders, which required the adoption of different and evolving working strategies as well as active and nurturing process management techniques. It has been argued that the factors underpinning the emergence of governance networks are often linked to efficiency, resource dependency or the need for a better integration of services. However, the nature of the issues at stake may also foster the need for a broad governance network; the multidimensional nature of homelessness goes beyond the boundaries of public responsibility and demands the engagement of various levels and areas of policy and service delivery. For this reason the emergence of governance networks in this specific domain should be analysed.”²

Background

Before the emergence of the National Strategy for the Integration of Homeless People, and despite some positive aspects, the work done with homeless people, mainly by NGOs, was not producing effective results, in spite of a significant state investment to support these NGO.

In fact the intervention of the NGO that worked with the homeless, frequently confessional ones, was disperse and unarticulated and aimed at the resolution of emergence situations, such as delivering food or cloths or providing health care, failing the necessary work to achieve the social or professional integration of homeless people.

The absence of national orientations and of the regulation of the existing shelters also contributed to the absence of results and stagnation of the social work produced by the NGOs.

The turning point arose when the Institute for Social Security, felling the need of a better understanding of the homeless phenomenon and of his social implications, decided to produce a research about homelessness. The results of the research were published in 2005 and one of the main conclusions was that there was an urgent need to design a national strategy to fight homelessness.

Designing the strategy³

The designing of the national Strategy followed up a first meeting, organised by the Institute of Social Security in May 2007, in which a group of public and private non-profit entities were invited to create the so-called inter-institutional group (IG) in order to initiate this process. (This decision was grounded in the established goals of the ISS’s 2007 action plan).

The IG was composed of several ministerial representatives (housing, employment, immigration and ethnic minorities, drugs and drug addiction, equality and citizenship, prisons and social reintegration, health and social security, research), the institution responsible for social action in

² Baptista, I. (2009) The Drafting of the Portuguese Homeless Strategy: An Insight into the Process from a Governance-Oriented Perspective, *European journal of Homelessness*, Vol. 3 December 2009.

³ This chapter was based upon the text from Isabel Baptista in the European journal of Homelessness, Vol. 3 December 2009, “The Drafting of the Portuguese Homeless Strategy : An Insight into the Process from a Governance-Oriented Perspective”, with the author’s permission.

the city of Lisbon, civil society representatives (NGO federations and federations of confessional organisations), the local municipalities' representative (the national association of Portuguese municipalities) and the research centre which represents the European Observatory on Homelessness in Portugal.

The initial group, created in May 2007, was enlarged during the drafting process.

As pointed out by Isabel Baptista⁴ it is possible to identify three stages in the engagement of different stakeholders throughout the process, which correspond to these evolving approaches:

- *Launching of the group:* The ISS invites a first group of public and private entities, proposing the activation of a process leading to the development of a national strategy.
- *Stabilisation of the core group:* The IG decides to invite other stakeholders to join due to their relevance and specificity of practice and knowledge around homelessness issues.
- *Occasional involvement of stakeholders:* Different members of the core group proposed occasional contributions by specific stakeholders at different stages of the process and with different objectives (e.g. the Director of FEANTSA was invited to present and report on FEANTSA's initiative and experience with regard to the strategy toolkit ; a presentation of good practices within the EQUAL initiative regarding the re-settlement of former prisoners was made to the whole group ; local networks' projects and strategies on homelessness were presented).

The consultative methodology involved mobilisation of stakeholders around core tasks and responsibilities throughout the process, occasional contributions from outside actors with relevant knowledge and experience and the gradual incorporation of various contributions from the local networks.

One of the main factors for the balance and the dynamics of the process was the relative stability of the core IG, enhancing internal cohesion. Despite some administrative limitations, a gradual investment of institutional resources in the process could be observed.

The pivotal role played by the coordination of the IG took in account the importance of a good preparation for and participation in all meetings and working groups, the dissemination of information, and the preparation of formal information to be circulated between senior officials in the ISS and other public bodies.

There was a special concern about the methodological approach that involved different types of communication processes:

1. Meetings

- Monthly group meetings - throughout all the process, particularly important in allowing
 - the sharing of knowledge and experience in the area of homelessness;
 - the discussion and agreement on a definition of homelessness;

⁴ Baptista, I. (2009) The Drafting of the Portuguese Homeless Strategy : An Insight into the Process from a Governance-Oriented Perspective, *European journal of Homelessness*, Vol. 3 December 2009.

- the founding principles of the national strategy.

These monthly meetings were also important in defining the strategy's trajectory in terms of objectives, tasks and responsibilities and preparation of decision's proposals (given the essentially technical nature of the representatives, these proposals had to be submitted to institutional boards).

- Enlarged meetings –involving institutional representatives with decision-making capacity at key moments of the group's work was vital for the success of the process. Therefore, these other institutional stakeholders were called upon to be present, together with the technical staff (from the IG), in enlarged meetings to approve final proposals from the group (e.g. on the definition of homelessness).
- Restricted meetings - the need to explore specific issues led to more restricted meetings which involved only those directly related to the issues under discussion, and they basically followed two different working methods:
 - Working group meetings were initiated following the initial phases of diagnosis and joint agreement on concepts, principles and structures of the strategy proposal. These meetings were held (weekly or fortnightly) for specific purposes (e.g. working groups on prevention, intervention and resettlement; groups responsible for drafting different components of the final proposal). These meetings ensured a more dynamic approach to specific tasks;
 - Sectorial meetings were held in the final stages on specific areas (health, employment, etc.) in order to ensure that relevant contributions would be made by the public sector, where necessary, to achieve the set objectives.

Participation on the working groups was on a voluntary basis, according to the expertise, interest and knowledge of the participants, institutional relevance and strategic importance, and it took into account the need to accommodate the availability of different IG members and their respective institutional commitments.

Meetings were crucial for the sharing of information (e.g. on progress achieved in the working groups, on links with external stakeholders), the discussion of ideas regarding the development of work and defining tasks and responsibilities throughout the process.

2. Communication channels

- Circulation and improvement of minutes - Following the meetings, the dissemination of the minutes, circulating for improvement contributions from all members of the IG (the minutes were prepared rotationally by all the members) allowed to establish a more efficient and inclusive communication, serving a more immediate and operational goal.
- E-mailing – this was the most commonly used communication tool throughout the process; comments on draft documents (including minutes) were circulated among members of the group (*reply to all* principle was agreed on from the beginning), who thus

had simultaneous access to the comments and suggestions made by each participant, although they were centralised by the ISS representative.

- Sharing of information – participants shared information on the development of relevant initiatives (e.g. seminars, conferences, training, and projects) and documentation (e.g. studies, policy documents, statistics at local, national or international levels), providing opportunities for upgrading and updating knowledge.
- IG's work with wider society – participation in activities mainly promoted by outside entities, organisations and working groups not directly involved in the strategy. These activities included projects implemented at different levels (national and local); for example, local networks addressing the issue of homelessness were invited to present their projects, and on-site visits to specific projects were organised. These activities generated relevant experience for the drafting of the national strategy.
- Participation of IG members in homelessness- related initiatives – this participation ensured the presentation of the progress and development of the drafting of the national strategy and the gathering of suggestions for improvement (e.g. at Lisbon's social network activities, to the Lisbon think-tank on homelessness and to the social security district delegations among others).
- Outside links – some external contacts such as the meetings with some strategic entities had a main role in creating opportunities for cooperation and interaction, and also for gradually increasing recognition of the importance of the upcoming first national homelessness strategy. This was the case of a meeting held with the national coordinator of the proposal for a national housing strategy (under preparation), and meetings with the National Statistics Institute to discuss the impact of adopting a definition of homelessness within the strategy, specifically the possibility of including some categories from the homeless definition in the 2011 census.

3. Decision making

“Decision making was mostly centred within the core group. Decisions on the contents of the strategy proposal were always taken within the context of regular IG meetings, following lengthy discussion and the drafting of different versions of the document contents. There was a specific concern throughout the process that each representative in the IG should be actively responsible for liaising with their senior officials on an ongoing basis in order to ensure institutional endorsement of the work that was being developed within the group. In cases where the scope and impact of the decision taken was seen as particularly challenging (e.g. the definition of homelessness), the methodology adopted was to gain formal institutional approval from all the entities represented in the group as soon as the group had reached a final consensus, and still within the process of drafting the strategy proposal. Thus, following approval within the group, the process of gaining institutional (and political) approval from each member of the IG was initiated: the proposals approved by the group were brought back to the respective institutions in order to be presented at a higher decision-making level (directors, presidents, boards etc.).

The IG discussed the amended versions and contributions, and an agreed new proposal was drafted that was in turn channelled through this legitimating path. In several sectors this

process facilitated the introduction of homelessness-linked measures in respective plans or strategies.”⁵

4. The launching

In spite of the fact that all stakeholders had signed out two “letters of commitment” – one for the definition of “homeless person” and another for the strategy implementation, the launching ceremony played an important role in the recognition of the public commitment with these documents. A large event, with around 300 people in the audience, was hosted by the Minister of Labour and Social Solidarity. Every responsible for each entity had the opportunity to show its approval with the strategy, through a public signature ceremony that took place after its public presentation.

5. The implementation

Three phases of implementation were planned:

1st phase – The dissemination of the definition and the strategy – 1st year;

2nd phase – The creation of local networks, diagnosis and local plans – implementation of an information system, training of professionals;

3rd phase – evaluation.

The first year of implementation

Organisational structure

The initial Interinstitutional group was replaced by a different structure to develop the implementation of the strategy:

Central level - Organisations involved in the strategy are grouped into two fundamental structures, an Extended Commission and an Executive Centre (GIMAE), and eight working groups were created, including researchers, experts and entities invited, related to the key strategic objectives.

Local level - Homelessness Local Planning and Intervention Centres (NPISA)

During this year new entities have joined the group of the Strategy (GIMAE) such as the National Defence Ministry (in view to further articulation in relation to support for former combatants in situations of homelessness), the National Statistics Institute (relating to the census and the dissemination of statistics) and the Ministry of Education (over the integration of the fight against stigma and stereotype the homeless in schools).

Elapsed over a year and a half from the ENIPSA launching, we can say that the objectives have been met, regarding the degree of generalised information that has been achieved.

⁵ Baptista, I. (2009) The Drafting of the Portuguese Homeless Strategy : An Insight into the Process from a Governance-Oriented Perspective, *European Journal of Homelessness*, Vol. 3 December 2009, pp. 68-69.

The activities planned for the first year (April 2009/2010) were fit under the careful preparation of the practical implementation of the Strategy in 2010 and had as main objectives:

- A. The dissemination of the homelessness definition approved and guaranteed use of the same language for all the entities working in the field;
- B. The characterisation of situations of homelessness in all municipalities;
- C. The involvement of social networking sites, primarily in the seven priority counties - Braga, Porto, Aveiro, Coimbra, Lisboa, Setúbal and Faro.

A. Dissemination of the homelessness definition

The spread of the definition approved and the Strategy document was carried out through meetings and workshops, conducted at two levels - internal to each of the entities represented in the GIMAE, and external.

- The internal diffusion of the definition and the strategy has resulted in various dissemination activities such as specific internal communication plans and meetings, workshops, technical guidelines, normative rules and publication / dissemination in their own journal articles, newsletters and websites each of the entities. (Statement of forms of communication used, attached).
- The level of external communication was processed in different contexts - meetings Platforms Supra-municipal, seminars devoted to the theme homeless and working meetings with the social networks of the cities of Lisbon, Porto, Coimbra, Aveiro, Braga, Setúbal and Faro (priority counties), and many others who have asked specific meetings on this topic.

Main difficulties encountered:

- Procedures for internal communication and cumbersome bureaucratic;
- Little time available from different entities of the GIMAE to attend dissemination sessions;
- Some resistance from traditional authorities to intervene in this area.

B. The characterisation of situations of homelessness in all municipalities

By the end of 2009 a questionnaire was sent to every local network in order to characterise the known homelessness situations. Responses were received from 58 counties concerning homeless and houseless people, where the former corresponds to all the situations on the street overnight accommodation and unconventional (car, abandoned building...) and the second to situations of emergency accommodation, downtown accommodation in temporary accommodation or pension or rented room.

The processing of this information permitted to obtain the following sociographic picture:

- Population mostly male (84%), about 60% are between 30 and 49 years;
- Nationality Portuguese - 82%;
- The majority of this population is isolated - 83%;
- The educational level is relatively low 8 (31% completed the first cycle and 23% completed the second cycle);
- State housing - according to the questionnaires, the housing situation prior to the collection of information, referred to most often is to stay overnight on the street (32%) or in temporary accommodation centre (22%);
- Regarding the current housing in the whole of the two categories shown, about 48% are in this situation for more than 1 year;
- The reason for the current situation is linked to family breakdown (33%), unemployment or job loss (22%) and personal problems (21%);
- Although about 28% is entitled to the Social Integration Income, and 11% of old age pensions or disability, about 25% does not enjoy any income and only 4% have income from salary;

As the main need of support, we identified the issues of drug abuse (28%), alcoholism (19%) and mental health (11%) as well as the need for occupation (referred to about 17% of cases). These data show some variation according to geographical areas.

Main difficulties encountered:

- Poor availability of staff time to fill the questionnaires;
- Lack of computerized means for recording data;
- Issues / concerns related to data protection;
- Insufficient knowledge about the situations accompanied.

At The level of GIMAE:

- Insufficient resources for data processing (information system not available yet).

C. The involvement of social networking sites

The involvement of social networks in implementing the national strategy is a prerequisite for its successful implementation in the country. Local social networks were invited to constitute

homelessness thematic groups or NPISA Planning and Intervention with Homeless People, within the social network programme framework.

According to the number of homelessness situations seven priority counties were identified – Braga, Porto, Aveiro, Coimbra, Lisboa, Setúbal and Faro. However other local networks have already constituted or are in stage of constitution of a NPISA (Cascais, Oeiras, Almada, Seixal, Figueira da Foz). In the counties where the number of homeless people is not enough to justify the creation of a NPISA, a focal point of the local network has been identified to assure the inclusion of this issue in a preventive perspective at local level development plans. So far, there have been identified 58 local partners (county level) for the National Strategy.

The 7 counties defined as priority are in different stages of their implementation, some of them having already prepared the diagnosis on homelessness and having designed their own development plan in order to pursue the objectives of ENIPSA, including:

1. To create conditions to ensure that no one has to stay overnight on the street for more than 24 hours due to lack of alternative;
2. To assure that all situations in shelters must be accompanied by a professional and the improvement in their living conditions;
3. Signalization, in time, of all situations that may run the risk of becoming homeless, in a preventive logic.

Main difficulties encountered:

- Low performance / participation or lack of some key entities (eg municipality of Porto);
- Insufficient human resources allocated to implementing the strategy (Lisbon, Porto, Faro and GIMAE);
- Insufficient budget allocation for implementation.

Specific projects

Since September 2009 the ISS, IP has funded a project "housing first" ("First Holiday") developed in Lisbon, which provides housing and personalized support to 50 homeless people suffering from mental illness, and that houses at the moment about 40 people. (The budget is 300.000€ for one year). The Strategy was also signed a protocol between the National Coordination Centre for Mental Health and Psychiatric Hospital in Lisbon, with a view to ensuring adequate access and monitoring of the situations of homeless people with mental illness.

Action plan 2010 and goals for 2010

Activities planned for 2010 were:

1. Monitoring the establishment and development of NPISA;
2. Development of information system;
3. Reformulation / creation of new solutions for homeless people;
4. Training of professionals;
5. Monitoring and evaluation of the strategy.

These activities should have been developed through the direct monitoring by their respective regional partners / locations by each of the entities of GIMAE and GIMAE organs (Extended Commission, Executive Core, Core Advisory and Sub-Working) and through an evaluation project (funded by POAT). However, not all of them were accomplished.

1. Implementation of NPISA activities

Goals

- NPISA formed in late 2010 in all municipalities that have identify the problem in their social diagnosis;
- Model of integrated intervention implemented in seven priority municipalities;
- 80% of cases identified as "homeless person" with case managers;
- 50% of cases of "homeless person" accompanied in health and mental health services if needed.

2. Development of information system

Contrary to the originally proposed, ENIPSA will not have a specific database and information system on homelessness. Instead, ISS, IP, is preparing the inclusion of the variables recommended at European level (MphasiS project) in the social security system.

Goals

- Variables introduced in Social Action Individual Process of ISS, IP;
- Social Action Individual Process available to institutions in a pilot project.

3. Reformulation / creation of new solutions for homeless people

The objective of reformulating the existing social responses or creation of new responses is part of the axis of the intervention of ENIPSA qualification and seeks to ensure a set of minimum standards that meet the needs of the heterogeneity and complexity of the problem.

It is understood that we need a basic legislation, but with sufficient flexibility, not to prevent the development of good solutions, just because he is not registering in the usual parameters of other equipment.

Goals

- Revision of the nomenclature of the SS for the responses to the homeless;
- Regulation of existing responses;
- Review existing arrangements for homeless;
- Identifying new answers to create;
- Proposal for a regulation of new answers;
- Development of new agreements;
- Creation of new Hosting answers;
- Draft participatory assessment (POAT);
- Funding Programme (PLASA) available from July.

4. Training of professionals

Development of a training programme, whose structure has already been approved by the ISS Training centre. This framework will be built by a group of researchers, professionals and homeless people coordinated by a subgroup of GIMAE and have a large practical component and use of participatory methodologies.

Goals

- Training programme available by the end of July;
- Training for technical staff and directors of institutions of Lisbon and Porto until December.

5. Monitoring and evaluation of ENIPSA

All representatives of the various entities in the GIMAE perform many other functions in addition to their work within the group, which prevents a constant attendance and ensuring continuous monitoring. However, in this implementation phase, in which was anticipated to be developed a range of activities much broader than before, it would have been necessary that the monitoring and evaluation subgroup could have had some logistical and administrative support.

It should be monitoring and evaluation on several levels:

1. Activity of GIMAE (organs and subgroups).
2. Implementation of the strategy:
 - a. Implementation level;
 - b. Activity of NPISA;
 - c. Activity of local networks in which there NPISA;
 - d. Fulfilment of different objectives.
3. Results and impact of ENIPSA.

Goals

- semi-annual monitoring reports and annual evaluation;
- semi-annual up-date reports on the activity of NPISA.

Conclusion

Good results in the designing of the strategy and the implementation of local networks were possible due to:

- Cohesion of the Interinstitutional group;
- Clear definition of tasks;
- Mobilisation and participation of stakeholders;
- Good communication channels;
- Sharing of information;
- Organisational structure;
- Existence of local networks within the social network programme;
- Evidence-base;
- Comprehensive and integrated approach.

Despite the good results obtained in relation to the targets proposed for 2009, the experience of the first phase of implementation has shown that the availability of resources was not enough to get hit all the objectives, as well as some difficulties in the harmonisation of timetables.

Therefore, the proposed activities to be undertaken in 2010 involved a greater commitment by the entities to ensure the possibility of achieving the main goals for this year, especially as concerns the provision of human, logistical and financial resources and the issuing of clear guidance from

central to local services and professionals, in relation to their participation in the integrated intervention models.

Appendix 1- Entities of GIMAE

ACS	High Commissioner for Health
ACIDI,IP	High Commissioner for Immigration and the Inter-cultural Dialogue
ANMP	National Association of Portuguese Municipalities
CIG	Commission for Citizenship and Gender Equality
DGS	General Directorate for Health
DGSS	General Directorate for Social Security
IDT	Institute for Drugs and Drug Addiction
IEFP	Institute for Employment and Professional Training
IHRU	Institute for Housing and Urban Rehabilitation
INE	National Institute of Statistics
LNEC - NES	Social Ecology Unit of the National Laboratory of Civil Engineering (research Institute)
PSP	Public Security Police
GNR	National Republican Guard
SCML	Santa Casa da Misericordia de Lisboa (Social action representative for the city of Lisbon)
DGIDC- ME	General Directorate for Innovation and Curricula development (Ministry of Education)
DGPRM- MDN	General Directorate for staff and military recruitment (Ministry of Defense)
DGRS	General Directorate for Social Reinsertion
DGSP	General Directorate for Prison Services
ENSP	National School for Public Health
ISS,IP - MTSS	Institute for Social Security
CNIS	Confederation of Social Solidarity Institutions
FNERDM	National Federation of Entities for the Rehabilitation of Mentally Ill People
CESIS	Research centre, representing Portugal in the European Observatory on Homelessness (FEANTSA)
REAPN	European Anti-Poverty Network Portugal
U-Mis	Union of the Portuguese Misericordias (not-for profit solidarity organisations)

Appendix 2 – Dissemination phase

Dissemination strategy
Internal
Workshops / meetings
Send a circular letter / guidance to the central
Preparation of document for strategic guidelines
Send a circular letter / guidance to local services
Dissemination of the Intranet Strategy
External
Newsletter / magazine / newspaper
Available ENIPSA site
Seminars, district meetings / supra-county level

Appendix 3 – Stages of implementation

Stage	Central Level	Local Level
1	<ul style="list-style-type: none"> ▪ Disclosure of the unique concept to all entities (E1-œ1) ▪ Dissemination of the intervention model and monitoring system (▪ Creation and installation of information system (E1-OE2) ▪ Creation of instruments for its implementation and monitoring (E2-OE4) and screenplay ((E1-OE3) ▪ Creation of a training and technical planning of it (E2-œ1) ▪ Proposals for the regulation of social responses (OE3 E2-, E2-and OE7C OE7D) ▪ Construction and dissemination of information material (E1-OE5) ▪ Promoting and monitoring the creation of Centres of Planning and Homelessness Intervention (E1-OE3) ▪ Disclosure programmes PROHABITA (E2-OE4) 	<ul style="list-style-type: none"> ▪ Territorial organisation of the entities involved (E1-OE3) ▪ Preparation for diagnostic, risk situations, situations, homelessness, ongoing monitoring of these situations, available resources / survey of local needs. (E1-OE3) ▪ Planning of activities (E1-OE3) ▪ Presentation of the local plan of PLASA (Programmes to Support Local Homeless) (OE2-E2 and E2-OE4)
2	<ul style="list-style-type: none"> ▪ Maintenance Information System (E1-OE2 and OE5) ▪ Creation of Internet site (E1-OE5) ▪ Survey of good practice (E1-E2-OE4 OE3) ▪ Recognition reference entities (E2-OE3) ▪ Provision of reference training (E2-œ1) ▪ Establishment and regulation of research awards and school (E1-OE4) ▪ Create proposal for introduction of the "homeless" in the curriculum of citizenship (E1-OE4) ▪ Promotion of awareness and combat stigma (E2-and E1-OE3 OE4) 	<ul style="list-style-type: none"> ▪ Recast / create answers (E2-OE3) ▪ Construction of local resource guide (E1-OE5) ▪ Survey of good practice (E1-E2-OE4 OE3) ▪ Training and awareness (E2-and E1-OE4 œ1) ▪ Developing answers to families at risk (E2, OE2) ▪ Monitoring and formalization of protocols (E2, OE2) ▪ Presentation of project "housing first" - (E2-OE4) and applications to PROHABITA
3	Stabilization, producing reports	Implementation of participatory evaluation system responses (E2-OE3)