



EU Network of
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on Social Inclusion

Assessment of the implementation of
the European Commission
Recommendation on **active
inclusion**

[A Study of National Policies](#)

Malta

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Assessment of the implementation of the
European Commission Recommendation on
active inclusion

A Study of National Policies

MARIO VASSALLO
UNIVERSITY OF MALTA

COUNTRY REPORT – MALTA

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Executive Summary

Social Inclusion has been the leit motif for practically all aspects of Maltese social policy since the end of the 1940s when the first major steps taken by the state to ensure that the least fortunate would not have to face extraordinary difficulties to survive and live decently. Even before then, the Maltese, through the Church and through numerous other localised initiatives, had sought to integrate the less fortunate and to provide schemes and services to mitigate their sorry state. The history of social policy in modern times in Malta has been a history of cumulative provisions with the same thrust, albeit now significantly moving towards a more professionally provided and sustained welfare system.

Malta's EU membership has effectively provided the island with the tools with which to more effectively focus on its social welfare provisions and to continue developing integrated and comprehensive systems in pursuit of a higher level of wellbeing to which all citizens are entitled. The lynchpins for this integrated policies were two: education and job availability. Maltese policy makers argue that education is the key to the eventual maximisation of the only natural resource which Malta has – human resources – and if all its citizens had access to work that is at the same time productive and satisfying, they would be easing themselves out of social exclusion and the risk of poverty. Parallel to this, welfare provision was to cater for persons who could not help themselves to the same extent either because of difficulties inherent in their lot (such as being born with physical, intellectual or other defects) or because they come from deprived backgrounds (such as children of peripheral groups or immigrants who land in Malta in search of a better way of life).

The delivery of welfare services has been considerably aided by the EU Structural Funds, the use of which Malta optimised especially to improve the chances of employment through numerous schemes that helped both employers and employees to secure permanent employment, through projects that improved the delivery of educational vocational services, through schemes that stimulated a higher female participation rate and also through schemes that improved services available to its elderly population. Despite the downturn in the international economic scene, these services were not touched and continued to be fully available, and at times have been even expanded even when matters were not so rosy. This continued commitment augurs well for the future, as the latest figures for early school leaving and tertiary education uptakes definitely do.

Malta effectively made enormous steps to ensure income support, inclusive labour markets and access to quality services. Obviously these terms imply a relativity, and what is considered adequate in one instance would be very inadequate in another. Welfare provision in Malta, especially in respect of the elderly and of those surviving on the minimum wage, has in fact been highly criticised on the basis of private research initiatives such as the one conducted by Caritas Malta.

This is in fact one of the most unfortunate features of welfare provision in Malta: services continue to be provided without the necessary research back-up that a modern state should have. Malta's services keep expanding, even thanks to the close co-operation between state institutions and the private sector, with little preliminary research, with practically no action-research whilst the services are being provided, and in respect of projects or schemes with an end-date, with little quantitative analysis to assess the success or otherwise of these initiatives. If the services are to be really effective, and sustainable, parallel and continuous research provision is essential. Equally essential is that both state and private policy making units are better manned in order to be able to provide the decision makers with well-conceived, fully researched and sustainable inputs.

1. Introduction

The objectives of this report have been defined as:

- First, to assess the extent to which Member States have developed integrated comprehensive active inclusion strategies in line with the 2008 Recommendation.
- Secondly, to document the extent to which new or expanded measures have been introduced under each of the three strands since 2008.
- Thirdly, to assess the impact and the cost effectiveness of the overall strategy and the individual strands in facilitating the integration into sustainable, quality employment of those who can work and providing resources which are sufficient to live in dignity, together with support for social participation, for those who cannot.

This study covers the three areas covered by the resolution, namely:

- Adequate income support;
- Inclusive labour markets;
- Access to quality services.

2. Integrated comprehensive strategies

2.1 Background

Malta's size and parish based organisational structure has traditionally contributed to a strong sense of community and close family ties. Only recent urbanisation and new trends in construction patterns, which have made it more common for newlyweds to settle in different communities away from where they were born and bred, are fast breaking the traditionally strong community attachments. Traditionally the Church contributed extensively towards a social system that thrived on subsidiarity and provided for a set of welfare needs, like homes for the elderly, the sick, Maltese migrants (when emigration from Malta was promoted as the only way to ease serious economic difficulties resulting from the British Services rundowns) and for children born out of wedlock. But, as from the late 1940s and especially as the new state developed after the attainment of national Independence in 1964, a state-run social welfare system developed fast, and is now firmly entrenched in actively protecting those at risk-of-poverty.

2.2 Comprehensive policy Design

In view of its commitment to address these concerns and emerging needs on the matters of social inclusion and integration, Malta's National Action Plans, as far back as 2004¹, identified key areas on which action was required. Progress was made

¹ The twelve priority areas identified in the 2004-2006 National Action Plan for Malta were:
Key priority 1: To increase employment and employability of vulnerable groups (including persons who are unskilled, who have been inactive for a significant period of time, unable to work a full time -table and parents with dependent children and disabled persons).
Key priority 2: To increase the current low female employment rate.
Key priority 3: To raise the current, low employment rate of persons aged 55 years and over.
Key priority 4: Making work pay.
Key priority 5: Ensuring that literacy and numeracy skills are acquired by all members of society, reducing school absenteeism and promoting life -long and life-wide opportunities at all levels and in a wide range of areas.

following the first and second NAPs, but more waited to be done, as provided for in the *National Report on Strategies for Social Protection and Social Inclusion 2008-2010*, which focused on three major and over-arching policy priorities:

- The promotion of the social inclusion prospects of children and young persons;
- The support for active inclusion; and
- The promotion of overall equality of opportunities.

These policy priorities cut across diverse population groups, situations and needs, and were intended to promote a comprehensive social inclusion strategy for both the general public as well as to identify vulnerable groups, which included: the long term unemployed, single parents, irregular migrants, drug and alcohol dependents, persons with mental health difficulties, victims of domestic violence, persons with a disability, older persons, children, and young people at risk.²

In 2008 Malta also recognized that a proactive social inclusion policy goes beyond a social protectionist approach. Policy needed to ensure the provision of services to facilitate participation and inclusion. As such, social welfare service provision and accessibility had to be increasingly tuned to empower people towards greater self-actualisation and autonomy through their integration in the labour market. Malta's social welfare service provision was to act as a safety net for the most vulnerable members of society. The 2008-2010 National Action Plan for social inclusion (which formed part of *Malta's National Report on Strategies for Social Protection & Social Inclusion*) also identified and addressed Malta's main challenges and obstacles in combating poverty and social exclusion. As such, *Malta's 2008 National Reform Programme on Social Inclusion* promoted an integrated active inclusion strategy based on three pillars:

- Adequate income support by undertaking a review of the social security system and providing measures to increase solidarity;

Key priority 6: Ensuring further inclusion and equal opportunities for students with disabilities or learning difficulties in primary and secondary schools.

Key priority 7: To further support families in need and families at risk of social exclusion, particularly victims of domestic violence.

Key priority 8: To promote public awareness of children's rights and to provide services to protect and empower children/youth.

Key priority 9: To ensure adequate and affordable housing to vulnerable groups by providing a wider range of services and schemes.

Key priority 10: Promoting the access to services faced by disadvantaged groups (persons with mental health problems, single mothers, victims of domestic violence, substance abusers, refugees and illegal immigrants).

Key priority 11: Ensuring adequate and sustainable pensions.

Key priority 12: Regeneration of Grand Harbour Area so as to increase access to housing, employment and community care and social facilities.

Source: [http://sgdatabase.unwomen.org/uploads/Malta%20-%20NAP%20on%20poverty%20and%20social%20exclusion%20\(2004-2006\).pdf](http://sgdatabase.unwomen.org/uploads/Malta%20-%20NAP%20on%20poverty%20and%20social%20exclusion%20(2004-2006).pdf) accessed on 20 June 2012

- 2 The 2008-2010 Action Plan for social inclusion also identifies and addresses Malta's main challenges and obstacles in combating poverty and social exclusion. The set targets included:
- tackling school absenteeism, learning difficulties and illiteracy and pursuing the commitment to reduce early school leaving and educational underachievement
 - ii) increasing the overall employment rate, particularly through the inclusion of vulnerable groups within the labour market, and making work pay;
 - iii) promoting greater availability of adequate and affordable housing;
 - iv) combating the intergenerational transmission of poverty and social exclusion;
 - v) addressing the social aspects of migration and promoting equality and diversity; and
 - vi) reforming the social protection system to ensure its sustainability, adequacy and comprehensiveness.
- Source: Malta: National Report on Strategies for Social Protection And Social Inclusion 2008-2010*

- Access to inclusive labour markets through instituting measures aimed at increasing the overall employment rate and facilitating the entry of women and vulnerable groups into the labour market; and
- Access to quality social services by strengthening measures to enhance work life balance, reduce burdensome procedures and enhance the effectiveness and quality of its social welfare services.

The 2011 NRP was even more focused and provided for specific measures to target social inclusion, and dedicated Part 3 to a thematic co-ordination of the targets. It dealt with the Key Measures to reach the five targets it set itself. As can be seen, the target for social inclusion was closely integrated with the other targets in a comprehensive policy design. Targets (a), (d) and (e) are closely integrated:

- a) employment rate target at 62.9% by 2020;
- b) R&D target at 0.67% of GDP by 2020;
- c) Improve energy efficiency, renewable energy and greenhouse gas emission reduction
- d) Education: aiming to reduce school drop-out rates to 29% by 2020; and increasing the share of 30-34 years old having completed tertiary or equivalent education to 33% by 2020³;
- e) lift around 6,560 people out of risk-of-poverty and exclusion⁴.

The 2012 NRP further consolidates this approach, as can be seen from the section on *Promoting Social Inclusion in Particular through the Reduction of Poverty*. Under this section, child poverty, pensions reform, supplementary allowance, disability, support for low work intensity households and training for employees earning the minimum wage are discussed and concrete measures proposed.

³ In respect of Malta's problems with early school leavers, it is readily acknowledged that Malta has the highest rate of early school leavers in the EU (33.5% in 2010 compared to the EU average of 12.5%). But it needs to be recorded that significant progress has been made in recent years (the ESL rate in 2000 stood at 54.2%). The national benchmark on early school leaving (29%) by 2020 is expected to be achieved far before 2020. Malta is taking clear and targeted measures towards reducing its early school leaving rate and increasing tertiary attainment. These include a combination of measures in compulsory education as well as in post-secondary education and training, further and higher education and in lifelong learning. The success of these measures is evidenced by the improvements achieved between 2010 and 2011, as the ESL rate fell from 36.9% in 2010 to 33.5% in 2011, whereas tertiary educational attainment increased from 7.4% in 2000 to 21.1% in 2011. Although final figures for the new academic year starting in October 2012 are not available, preliminary figures indicate that entrance to post-secondary institutions is going to be higher this year than last year.

⁴ Despite the danger that overspill of the international financial situation will negatively impact the Maltese economy, the commitment in Malta to continue to give particular attention to those groups who are considered to be more vulnerable and thus at greater risk of poverty and social exclusion is still very strong, and focuses mainly on three main groups: children, elderly people and persons living in households with low work intensity. The measures included in Malta's National Reform Programmes for 2011 and 2012 specifically aim to address the difficulties which these target groups are experiencing. Indeed, although Malta's at-risk-of-poverty rate has shown an upward trend in recent years, the increase has been a relatively marginal one and compares favourably with that of some of the other Member States. It should also be pointed out that Malta is currently developing a tracking device which is mainly based on the employment policy area, in order to be in a position to monitor performance in achieving the national target in the coming years. In effect, this also reflects the policy consistently followed by the Maltese Government to encourage and assist people in need through active involvement in the productive economy, and thus shed their culture of dependence and move towards productivity and contribution.

The thrust of a comprehensively designed policy could not be clearer throughout the set of policy documents since 2004.

2.3 Integrated Implementation

The Maltese basis for integrated implementation is based on the concept that 'education' and 'employment' are the two lynchpins which are crucial to Malta's strategy to prevent and combat poverty and social exclusion, given the strong ties between unemployment and risk of poverty.

Active inclusion is upheld by Malta as being more effective if accompanied by measures that enhance people's prospects for participation in all aspects of life and promote equality of opportunity. Improving a person's life chances through better qualifications and work are thus perceived to be essential for the long term battle with exclusion. Achievements in these two crucial sectors would make combating discrimination in its various forms and promoting integration much easier. In essence the argument runs: educate people so that they can find work, and if they are working they are automatically helping themselves to move out of poverty.

2.4 Vertical policy co-ordination

In virtue of Malta's small size, issues of vertical integration do not arise. Local administration at community level operates through Local Councils which provide a constant flow of information services on national policies and programmes. In certain instances Local Councils are responsible for specific activities like running Day Centres for the elderly and some training programmes, but these are done within nationally established parameters, and generally by locking into national programmes both in design and funding.

2.5 Active participation of relevant actors

To ensure full social participation irrespective of religion or belief, disability, age, gender or sexual orientation, the Maltese believe that effective service delivery requires the coordinated input of all stakeholders of society, including; public, private and voluntary entities. Malta in fact endorses the need to prevent poverty and social exclusion through the help of non-governmental organisations, and as a result has instituted measures to strengthen the role of the voluntary sector. Furthermore, it is recognized that apart from the range of available measures, the effectiveness of social inclusion measures also extensively rely on the disposition and ability of all stakeholders to coordinate their initiatives with a view to achieve common goals and objectives.

Combating the risk of poverty and social exclusion is a complex cross-cutting challenge that affects various social welfare sectors. Malta's National Action Plans repeatedly acknowledge these challenges through the provision of social inclusion policies and measures that strengthen legislative and administrative mechanisms. A number of initiatives provide for subsidiarity programmes between the state and voluntary sectors to co-operate in programmes aimed to increase intensity in the implementation of social inclusion policies.

Communication among those involved in Malta is facilitated by the sheer size of the island, in which everybody knows everybody else working in the same field. Consultations are therefore continuous. Institutionally, there are two structures which contribute to the flow of communication between state and non-state segments: the *Council for Voluntary Sector* within the office of the Commissioner for Voluntary Organisation and the *Malta Council for Social and Economic Development* (MCSED). The precise extent to which both these structures have been systematically used to develop communication cannot be easily established but the structures do exist. In

respect of MCESD, it has often been commented that discussions within it generally focus on the economic and only indirectly impinge on the 'social'. In this respect a lot more needs to be done for MCESD to have the resources to address the 'social' component of its obligations implied in its very name designation.

3. The impact and cost effectiveness of measures introduced or planned under the 3 strands

3.1 Introduction

By way of introduction to this section, it has to be noted that no cost effective studies of measures is known to have yet been undertaken in Malta. The 2012 NRP promised a systematic examination of the success of measures. But this appears not to have happened yet, and if it has been, it is not yet in the public domain. One would effectively have expected this to be included in Annex 1 of the 2012 NRP, under the heading 'Quantitative information', but this is left empty throughout⁵. Perhaps this has not been implemented because it was meant to be undertaken mid-year, but the 2012 NRP was in circulation much earlier.

Table 1: NSR 2008-2010 (Social Affairs) Measures - Status as of December 2011 (for measures falling under the Ministry for Justice, Dialogue and the Family)

Status	No	Comments/Notes
Completed	18	
On-going	20	
Work in progress	16	9 of which are being implemented through ESF Funds, i.e. with a definite completion date
Halted/awaiting direction	8	2.4.1.1, 2.4.1.2, 2.4.1.3, 2.4.1.4, 2.4.3.5, 2.4.3.9, 2.4.3.12, 2.5.1.1
Withdrawn/Dropped	2	2.4.2.3, 2.4.3.1
Not approved	2	2.3.1.10, 2.5.1.3
No budget allocated	1	ETC
Implemented earlier in 2007	2	

Note: The measures listed above cover: 'Personal Development'; 'Well-being' and 'Safeguarding the rights of children and young people'

Source: Social Affairs Directorate: Implementation Report

What is known to have taken place however are a set of progress reports on the individual measures implemented up to the end of 2011. In respect of the three Priority Policy Objectives *Enhancing social inclusion prospects of children and young persons, Promoting Active Inclusion and Promoting Equality of Opportunity*, a total of

⁵ Actually this Annex is not published in the printed copy of the NRP.

sixty-eight Social Affairs Measures were envisaged and another seven under health. The status of these measures at the end of 2011 is given in Table 1 above.

3.2 Adequate income support

Measures to ensure adequate income support are addressed at two main groups of persons in Malta, name *jobless households* and the *elderly*. The measures taken in respect of each are:

a) Jobless households:

- i) increasing social benefits by the COLA amount for means tested and non-contributory benefits, such as supplementary assistance, the energy benefit, and the pink card;
- ii) strengthening efforts to curtail abuse of social benefits;
- iii) removal of the five year term limit whereby a widow/widower who remarries remains entitled to a flat rate widow pension; and
- iv) introduction of measures whereby a severely disabled person who gets married does not lose his/her pension due to his/her partner's income;
- v) introducing amendments in the part-time tax rules in order to remove anomalies which were having a negative impact, particularly on pensioners and some Government employees;
- vi) making the labour market more attractive for parents by introducing a 'parent computation' category for parents supporting children who are not gainfully employed up to 18 years of age and up to 21 years for those are still in tertiary education; and
- vii) continuation of the measures taken in favour of women who benefit from an untaxed year for every child.

b) Elderly persons

- i) the provision of the full cost of living increase to pensioners;
- ii) encouraging independent living amongst the elderly in their own homes by giving a new €300 a year grant to every elderly person over 80 living in their own home or with their family;
- iii) removal of VAT on private nursing and home help offered by the private sector to the elderly in their private homes;
- iv) increased ceiling of income tax exemption for relatives of elderly people helping their parents to live in private nursing homes;
- v) extension of present provisions regarding service pensions; and
- vi) refunds of tax paid to elderly who are tax exempt and who pay 15 percent withholding tax without completing a tax form.

These measures have had a cumulative effect and have contributed substantially to ensure the availability of a sufficient income. Obviously, the notion of what is sufficient can vary, and in effect a March 2012 study by Caritas Malta on the minimum wage insisted that the minimum wage is not enough to meet essential costs⁶. This

⁶ The Caritas Study findings were even presented formally to the Cabinet of Ministers. The outcome of this presentation is not known.

study by Caritas showed that in the case of three types of households⁷, living a frugal lifestyle, faced serious problems to survive if their income was at the level of the minimum wage. The Caritas report presents the minimum estimated cost of the selected items put together for the three household types. Assembled with a frugal approach, the basket includes eight basic categories (1) food, (2) clothing, (3) personal care, (4) health, (5) household goods, maintenance and services, (6) education and leisure, (7) transport and (8) housing. The detailed calculations of Caritas study are reproduced in Table 2 below.

The Caritas study concludes that the minimum essential budget per annum for these households, is estimated at €10,634 for two adults and two children; €8,581 for a lone parent with two dependent children;; and €6,328 for an elderly couple. These calculations include an estimate of in-kind benefits, which are annotated underneath Table 2 below. In addition, the Caritas report covers benefits under Schedule V (Yellow Card) which covers medicine entitlements for patients suffering from chronic conditions. On the other hand, the Pink Card extends entitlement for specifically listed medicines to the following categories: members of certain religious orders; diabetics; members of the police force; members of the armed forces; and patients suffering from tuberculosis, leprosy and poliomyelitis. The report insists that households that do not benefit from financial assistance on housing, medicine and energy or from free foodstuffs evidently incur higher costs.

The Caritas study figures are disconcerting. Malta's national target to lift around 6,560 persons out of risk of poverty and social exclusion by 2020 is sustained in the NRP, and in section 3.5.2.5 attention is focused on strengthening support services to Jobless Households (Low work intensity of households). In this section, the consolidation of support services is described. Section 3.5.2.6 in turn focuses on training programmes for Employees earning the minimum wage. The provision of training initiatives, coupled with a financial incentive of €25 for those who opt for training, is described in this section.

Given that according to SILC 2009, the percentage of households with disposable income under €10,000 amounted to 24.4%,⁸ the provisions of the 2012 NRP appear not to be enough, and indeed the situation might be found to be worse when more recent data becomes available.

The Caritas study makes a very strong economic case for a change in the statutory Minimum Wage from €158.11 to €180 per week of 40 hours (+ 13.8%).⁹ This concrete measure, if implemented at least partially, would contribute significantly to an improvement for many, and needs to be very seriously considered especially in the context of the Maltese economy which has, hitherto at least, not suffered extensively from the effects of the economic turndown that has affected other economies.¹⁰

⁷ The three types studied were: (i) two adults and two dependent children; (ii) a lone-parent and two dependent children; and (iii) an elderly couple. In each case it was assumed that these household types were entitled to benefits (pink card under Schedule II, in receipt of free food under the EU or local charitable food aid schemes, residing in Government-owned premises at subsidised rent, and in receipt of energy vouchers). See full report at [http://www.caritasmalta.org/AMinimumBudgetforaDecentLiving_McKay_Sammut_Farrugia_Piscopo\(MinimumSize\).pdf](http://www.caritasmalta.org/AMinimumBudgetforaDecentLiving_McKay_Sammut_Farrugia_Piscopo(MinimumSize).pdf)

⁸ https://secure2.gov.mt/nso/statdoc/document_file.aspx?id=3085. Page 14. Accessed on 1 May 2012.

⁹ Page 43.

[http://www.caritasmalta.org/AMinimumBudgetforaDecentLiving_McKay_Sammut_Farrugia_Piscopo\(MinimumSize\).pdf](http://www.caritasmalta.org/AMinimumBudgetforaDecentLiving_McKay_Sammut_Farrugia_Piscopo(MinimumSize).pdf)

¹⁰ An increase in the minimum wage has been systematically opposed by employers, who claim that, if implemented, it would reduce Malta's competitiveness. However true this may be, there is no published study to prove this claim, and the result of this opposition leaves many surviving on the minimum wage in dire straits.

Table 2: Minimum estimated costs for three household types***

Item		2 Adults & 2 Children		2 Lone Parent & 2 Children		2 Elderly Couple 65+	
		Monthly €	Yearly €	Monthly €	Yearly €	Monthly €	Yearly €
Food	7-Day Menu ¹	464.27	5,571.28	348.50	4,182.78	217.89	2,614.76
Clothing	Garments*	37.50	450	33.33	400	25	300
	Shoes & Footwear	28.67	344	20.54	246.50	15	180
Personal Care	Personal Care	56.75	681	51.75	621	46	552
Health	Pharmaceutical Products ²	17.23	206.78	12.27	147.28	30.58	367.01
Household Goods, Maintenance & Services	Furniture & Furnishings (and Textiles) *	13.84	166	13.67	164	13.67	164
	Appliances*	11.75	141	11.75	141	11.75	141
	Maintenance & Repair: Material*	10.92	131	10.42	125	10.42	125
	Maintenance & Repair: Services*	18.83	226	18.83	226	18.83	226
	Laundry detergents	7.80	93.60	6.50	78	5.20	62.40
	Non-durable Goods	10.83	130	10.83	130	5.42	65
	Telephone/TV/Internet	33	396	33	396	33	396
	Electricity^	36.95	443.39	34.10	409.25	32.77	393.26
	Gas^	14.17	170	14.17	170	17	204
	Water^	15.47	185.70	13.22	158.61	11	132.05
	Printing & Stationery	15.33	184	15.33	184	0	0
	Uniforms	16.75	201	16.75	201	0	0
Transport	Public Transport	60.67	728.04	34.67	416.04	18.40	220.80
Housing	Rent ³	15.42	185	15.42	185	15.42	185
Grand Total		886.15	10,634	715	8,581	527.35	6,328

***Notes: ¹ **Food Aid Scheme** – It has been calculated that a family of four persons is given foodstuff worth approx. €31 monthly (market value); family of three given approx. €23worth of food monthly (market value,); a family of two is given approx. € 15worth of food per month (market value); reference month September 2011 food provision. These amounts have been considered when costing the Food Menus.

²**Pink Card Holders** – Appendix C shows that 2 adults & 2 children family who are **not** entitled to the Pink Card are paying an approx. € 851 per annum (four times as much to cover health care costs). For those elderly who are not in receipt of state provided medicine via the pink card, health care costs increase up to around €949, three times as much.

³**Subsidized Rented Housing:** These figures are for Housing Authority government owned subsidised rented dwellings. Data obtained from the Housing Authority states that families with children are generally paying an average commercial rent of € 2,865

per year or €238.75 per month for private furnished apartments *Prices according to the Average Consumer Expenditure of the Lowest Income Quartile earning less than €10,585 according to HBS 2008

^Energy Benefit a family of two adults & two children receives a €151.84 per annum in water & electricity rebate; a lone-parent & two children household receive €137.64, whilst an elderly couple (65+) receives €127.16 per annum in water & electricity rebate **LPG rebate** is worked out as €15 per household per calendar year; if a single member is elderly, the amount becomes €25

Source: Malta, Caritas, 2012, 'A Minimum Budget for a Decent Living – A research study by Caritas Malta focusing on three low-income household categories'. Table 14. [http://www.caritasmalta.org/AMinimumBudgetforaDecentLiving_McKay_Sammut_Farrugia_Piscopo\(MinimumSize\).pdf](http://www.caritasmalta.org/AMinimumBudgetforaDecentLiving_McKay_Sammut_Farrugia_Piscopo(MinimumSize).pdf)

Old age poverty is increasingly becoming very real in Malta as salaries increase, the cost of living spirals, but pensions remain pegged except for cost of living increases which do not necessarily cover the full extent of increased costs because of imperfections in the instrument used (COLA: *Cost-Of-Living Adjustment*)¹¹. As can be seen from Tables 3 and 4, in 2010, as many as 18.7% of those aged 60 and as many as 18.8% of those over 65 years of age were considered to be at-risk-of-poverty. The rates are declining, but are still higher than the average of the main groups of EU Member States. Males fare worse than the average for the total population of all persons aged 60 and over and for those aged 65 and over, at 20% and 18.8% respectively. The rates for females are lower than those for males, at 17.6% for those aged 60 and over and 17.5% for those aged 65 and over. These figures are a matter of grave concern.

Matters are actually becoming increasingly worse as the young old are forced to retire if they are employed with either Government or the private sector and the possibilities of remaining in employment are very limited.¹² The relatively fortunate few who are retained or are able to find alternative employment can however keep their social security pension and their salaries, but still have to pay National Insurance contributions in full even though their pensions are fixed until death. To reduce the incidence of poverty among those aged 80+, an additional benefit of €300 has been introduced as from 2012.

¹¹ For details on COLA, please see <http://www.ssa.gov/oact/COLA/colasummary.html> Accessed 1 May 2012.

¹² Despite the delays and long waiting lists in Public Health, some very qualified surgeons were forced to retire at 61, at a great loss to the community and to themselves.

Table 3: At-risk-of-poverty rate by poverty threshold, age and sex

Age 60 years or over

	2004	2005	2006	2007	2008	2009	2010	2011
TOTAL POPULATION								
European Union (27 countries)	:	17.6	17.6	17.4	17.6	16.9	15.2	:
European Union (25 countries)	:	:	:	:	:	:	:	:
European Union (15 countries)	:	18.4	18.2	17.9	17.9	17.0	15.5	:
New Member States (12 countries)	19.4	13.9	14.9	15.4	16.5	16.5	13.9	:
Euro area (17 countries)	:	17.8	17.6	18.3	16.9	16.4	14.8	:
Malta	:	22.9	23.9	21.0	23.8	20.3	18.7	:
MALES								
European Union (27 countries)	:	15.3	15.3	14.7	15.1	14.6	13.0	:
European Union (25 countries)	:	:	:	:	:	:	:	:
European Union (15 countries)	:	16.2	16.0	15.3	15.5	15.0	13.5	:
New Member States (12 countries)	15.7	11.0	11.9	12.0	12.8	12.5	10.4	:
Euro area (17 countries)	:	15.4	15.4	15.7	14.6	14.3	12.8	:
Malta	:	23.0	24.0	22.9	24.4	21.2	20.0	:
FEMALES								
European Union (27 countries)	:	19.4	19.5	19.5	19.7	18.7	17.0	:
European Union (25 countries)	:	:	:	:	:	:	:	:
European Union (15 countries)	:	20.2	20.1	19.9	19.9	18.6	17.2	:
New Member States (12 countries)	21.4	15.9	16.9	17.7	19.0	19.2	16.2	:
Euro area (17 countries)	:	19.7	19.3	20.4	18.9	18.1	16.3	:
Malta	:	22.7	23.7	19.4	23.3	19.5	17.6	:

Source: SILC

Table 4: At-risk-of-poverty rate by poverty threshold, age and sex

Age 65 years or over

	2004	2005	2006	2007	2008	2009	2010	2011
TOTAL POPULATION								
European Union (27 countries)	:	18.9	19.0	18.4	18.9	17.8	15.9	:
European Union (25 countries)	:	:	:	:	:	:	:	:
European Union (15 countries)	19	19.8	19.7	18.9	19.1	17.8	16.1	:
New Member States (12 countries)	20.5	14.6	15.6	16.4	18.0	17.9	14.6	:
Euro area (17 countries)	:	19.2	18.8	19.3	17.8	17.1	15.2	:
Malta	:	23.4	24.2	20.7	24.7	20.9	18.8	:
MALES								
European Union (27 countries)	:	15.9	16.1	15.3	15.9	14.9	12.9	:
European Union (25 countries)	:	:	:	:	:	:	:	:
European Union (15 countries)	16	16.9	17.0	16.0	16.3	15.3	13.4	:
New Member States (12 countries)	13.2	10.7	11.7	12.0	13.4	12.8	9.9	:
Euro area (17 countries)	:	16.2	16.2	16.4	15.0	14.5	12.7	:
Malta	:	23.2	25.3	24.5	25.6	22.0	20.4	:
FEMALES								
European Union (27 countries)	:	21.1	21.1	20.7	21.2	20.1	18.1	:
European Union (25 countries)	:	:	:	:	:	:	:	:
European Union (15 countries)	21	22.1	21.9	21.1	21.3	19.8	18.3	:
New Member States (12 countries)	24.1	17.0	18.1	19.2	20.8	21.1	17.5	:
Euro area (17 countries)	:	21.4	20.8	21.5	20.0	19.1	17.1	:
Malta	:	23.5	23.3	17.7	24.1	20.0	17.5	:

Source: SILC

Malta's NRP gives attention to the sustainability of pensions in Malta in the long term, but a number of issues that affect the elderly are not addressed. These include:

- The urgent need to abolish obligatory retirement at a prescribed age. Many persons reaching this age feel that they can still contribute significantly to the economy. When they realise the effects of their sudden but very significant income decrease, quite a few feel that society is indeed keeping them alive with modern medical facilities, but then forces them to substantially reduce their living standards because of the low pensions they have a right to. The Caritas report, referred to earlier, provides further evidence of the sorry plight of Malta's elderly who do not enjoy a good pension and have no independent means;
- The revision of pensions for persons who continue to work beyond the official retiring age: these individuals continue to pay their contributions but do not derive a pension equivalent to that derived by persons who retire from work when they themselves stop working because pensions are pegged to the date when they reach 61 and not to when they actually retire. This introduces a form of

discrimination because the contributions continue to be paid, but no equivalent benefit accrues.

The increase in the working population, through the parallel policy of not forcing people to retire because of age only and making it more attractive for more female profitable activity, is an essential way forward to ensure sustainability of the welfare system in Malta.

It must be stated however that persons who have a right to existing provisions, like unemployment benefits or other social welfare entitlements, do not find difficulty to secure them. As will be seen in the next section, the incentive to work is generally preserved, except that in certain cases the amount of income support received through the various welfare schemes makes it unattractive for persons to actively seek employment, except perhaps in the black economy which will allow them to receive welfare-based income and at the same time derive income from undeclared work. A number of suggestions have been made over the years to combat this, but so far only policing has been implemented. A requirement that persons deriving benefits should be obliged to provide services of some kind, either through Local Councils or other nationally organised schemes, would definitely go much further to curtail these bad practices.

3.3 Inclusive labour markets

As has already been indicated above, Malta's approach to active inclusion is through the provision of working opportunities for all. Over the last few years, an enormous effort has been made in this direction, despite the difficult economic situation prevailing as a result of the recession. It has been frequently argued in Malta that even during a recession, labour has to be kept in gear to ensure that when demand for services and products picks up, capacity to produce still exists. The main areas where this has been implemented are:

a) Investing in the creative economy. This has been implemented by:

- offering an innovative scheme to self-employed persons registered as authors, composers, visual, film, design and performing artists working in the City of Valletta; and
- extending the 'Create' scheme to the whole area of Valletta so as to encourage more creative activity in the capital city.

b) Increasing investment in human capital by:

- allocating additional funds for training to the Employment and Training Corporation for the Employability Programme;
- continuation and consolidation of the Training Aid Programme which subsidizes between 25 and 80 per cent of training expenses; and
- offering training programmes for workers who want to work in the Green economy sector.

c) Investing in small and medium enterprises and promoting entrepreneurship through:

- extending the MicroINVEST scheme for micro enterprises;
- continuation of the BOV Jeromie scheme;
- launch of the MicroGuarantee Scheme, which provides guarantees on loans to small enterprises;

- financing of projects under the '20millionforindustry' scheme;
- setting up a Consultative Body and a College of Regulators with the aim of advising the Government on the formulation, implementation and regulation of enterprise policy; and
- proposing legislation for a regulatory framework for social enterprise.

d) Promoting inclusive and flexible Markets by:

- reviewing the social security system so that persons with a disability who receive a severe disability pension will be able to work and earn up to the minimum wage without losing any of their pension; and
- the coming into force in December 2011 of the 'Temporary Agency Workers Regulations' (Legal Notice 461 of 2010) which provide for the regulation of temporary employment.

e) Incentivising activism through the:

- extension of the Community Work Scheme; and
- launching of a consultation process with social partners on the Active Labour Market Policy in preparation of the development of a long-term policy on employment.

As can be seen, steps to promote inclusive labour markets in Malta have been extensive and far reaching. The changing nature of the international economy has exerted and continues to exert heavy stresses on the Maltese economy, but the fact that Malta continues to increase the number of gainfully employed, to increase the participation rate of females and to provide assisted training schemes to young people both in Malta and abroad, is enough testimony that in this sector Malta's efforts to reach these targets are unstinting and continuous. It even extends to initiatives to enhance employability chances to persons in correctional facilities, where, just to quote an example, 173 of the inmates received training in 2010.

One area where this is not so evident is in the effort to systematically incorporate labour available through the illegal immigrant stream. Although immigrants have the possibility to benefit from all the on-going training facilities available in Malta, their participation rate is not very extensive. In this area, a more systematic approach is required, and possibly linked to an incentive scheme that makes it attractive for members of this very diverse group to acquire new skills. This would, among other things, stop the current flow into construction related jobs, in which they are easily exploited, and better utilise skills which have hitherto remain untapped.

3.4 Access to quality services

The above discussion has already indicated that access to quality services in Malta is quite high on the agenda. Two primary service sectors are given a lot of importance in this regard: education and health. As already indicated, training opportunities are not only provided free, but financial assistance, in the form of grants through the STEPS programme, is given to those in training both in Malta and overseas in areas where training in Malta is not available. Financial assistance is also provided to students following training in private institutions in Malta as long as the academic credibility of these institutions is ascertained. Health is the other pillar on which this policy is based, in the belief that a healthy population is the best guarantee for the sustainability of a thriving economy and of a happy way of life.

The main areas of social welfare where access to quality services has been consolidated further in recent years are:

- a) *Strengthening measures to enhance work life balance and consolidate family friendly measures through:*
- the development of an action plan for implementing the third two-yearly Gender Equality Plan to help women enter, retain and progress in employment;
 - preparatory work towards the implementation of 'NISTA', a project aimed at raising awareness on the sharing of non-remunerated family work and the benefits of work-life reconciliation measures;
 - implementation of a number of initiatives aimed at increasing the female employment including: the project 'TAJJEB' funded under the PROGRESS Programme, re-launching of the 'INT (Int Ibda in-Negożju Tieghek) Scheme; the ESF Employment Aid and Employability Programmes; and the re-launching of the 'Women @work Project' initiative and the extension of the ETC Childcare Subsidy Scheme to subsidise elderly care services; and
 - undertaking of research by the National Commission for the Promotion of Equality to better understand obstacles to women's environment in training and employment.
- b) *Reduce burdensome procedures to facilitate access to social welfare services for all citizens through:*
- initial work towards the introduction of a single means testing mechanism to streamline eligibility to means-tested benefits and services across Government;
 - preparatory work towards the introduction of an on-line application system for all benefits;
 - providing beneficiaries with on-line access to relevant social security information through the development of a SABS Web Query Tool for DSS employees;
 - facilitating the annual review of benefit entitlements through better networking between government entities, thereby reducing unnecessary bureaucracy constraining service delivery; and
 - the setting up of a mechanism to streamline processes relating to the registration of births and deaths.
- c) *Ensuring the sustainability of the social protection system by reducing abuse of social benefits by:*
- proactive measures which strengthen the working processes within the Social Security Division through
 - an in-house training programme for staff of the Social Security Division;
 - instalment of hardware equipment to strengthen the Ministry's information centre and provide better customer care;
 - preparatory work towards the drawing of a Standard Operating Procedure delineating all the working processes of the various sections of the Division; and (b) strengthening the Benefit Fraud and Investigations Directorate through the engagement of additional Inspectors, the purchase of additional vehicles and enhanced security for staff; and (c) preparatory discussions towards extending the assessment regime for social benefit entitlement to work-related impairment benefit.

- d) *Continue to strengthen the voluntary sector by ensuring that the structures provided for in the Voluntary Organisations Act are in place and functioning properly. In this regard, work is underway for the:*
- compilation of a database of Voluntary Organisations;
 - organization of a filing system of press cuttings in relation to the Voluntary Sector;
 - publishing of a register of Voluntary Organisations which are enrolled with the Commissioner for Voluntary Organisations;
 - the setting up of an Information Centre at the Office of Voluntary Organisations; and
 - the conduction of research regarding the participation of youths in the voluntary sector.
- e) *Enhancing effectiveness of social services by consolidating standardisation practices and strengthening the Department for Social Welfare Standards by:*
- the design of a 2-year part-time post-graduate course on the 'Assessment in the Regulation of Social Care'; and
 - the submission of an EU funded project for carrying out a mapping exercise across the public and voluntary social care sectors, with the aim of establishing National Occupational Standards at vocational level and to determine training needs of the workforce.

In November 2011, a draft Child Policy was launched by the Ministry of Education, Employment and the Family¹³. The basic concepts on which this policy document is built upon are: *Best Interests; Mainstreaming; Well-being; Participation; Inclusion; Accessibility; Protection; Families; Accountability; and Sustainability*. The strong emphasis on 'Inclusion', 'Well-being' and 'Participation' is a clear indication that Malta believes that access to quality services must start at a very early age in life. The implementation of the new ideas contained in this document would enhance the life chances of Maltese future generations, irrespective of origin, colour or creed.

¹³ Available at: <http://c256.r56.cf3.rackcdn.com/7423365554563f7c1d728f784650d3812190623728.pdf>. Accessed on 24 June 2012.

Table 5: Expenditures on benefits: social exclusion 2000 – 2009

(All Schemes; Euro per inhabitant at constant 2000 prices)

GEO/TIME	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	% Change 2000-2009
European Union (27 countries)	:	:	:	:	:	66.58	71.77	75.83	75.76	85.40	
European Union (25 countries)	60.01	62.65	65.69	67.77	68.27	70.27	75.68	79.55	79.65	90.23	50.37
European Union (15 countries)	68.91	71.81	75.00	77.20	77.89	79.06	86.01	91.74	92.31	104.21	51.24
Malta	24.29	22.36	21.29	23.70	26.83	30.77	35.92	41.81	44.08	45.77	88.43

Source: Eurostat

Table 6: Expenditures on benefits: social exclusion 2000 – 2009

(Housing; Euro per inhabitant at constant 2000 prices)

GEO/TIME	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	% Change 2000-2009
European Union (27 countries)	:	:	:	:	:	130.33	137.78	130.51	130.15	133.85	
European Union (25 countries)	111.88	113.26	119.07	115.47	122.54	138.60	146.46	138.67	138.15	142.04	26.96
European Union (15 countries)	131.98	133.16	140.85	135.44	143.96	162.63	171.74	161.20	160.85	165.85	25.66
Malta	19.69	14.40	26.31	31.36	33.50	18.69	21.94	31.98	32.01	23.14	17.50

Source: Eurostat

Table 7: Expenditures on benefits: social exclusion 2000 – 2009

(Old Age; Euro per inhabitant at constant 2000 prices)

GEO/TIME	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	% Change 2000-2009
European Union (27 countries)	:	:	:	:	:	2099.45	2130.72	2101.77	2222.41	2326.15	
European Union (25 countries)	2023.68	2052.61	2085.82	2142.06	2184.24	2225.30	2255.84	2222.41	2345.12	2450.85	21.11
European Union (15 countries)	2343.47	2369.78	2403.60	2463.62	2508.00	2552.83	2581.36	2538.85	2682.29	2793.41	19.20
Malta	730.47	780.49	775.17	761.50	762.53	803.82	842.50	875.17	923.75	985.50	34.91

Source: Eurostat

4.2 Use of EU Structural Funds

Malta has extensively utilised EU Structural Funds to support the development and implementation of an integrated active inclusion policy¹⁴. A total of €855 million worth of EU funds has been allocated for Cohesion Policy 2007-2013 in Malta. Table 8 gives details of the allocation:

Table 8: EU Funds allocated to Malta 2007-2013

ERDF	€ 444 million
Cohesion Fund	€ 284 million
ESF	€ 112 million
European Territorial Cooperation Programmes (ERDF)	€ 15 million

The goals and strategic priorities for Cohesion Policy 2007-2013 in Malta are identified by Malta's National Strategic Reference Framework (NSRF)¹⁵, which was approved by the European Commission in December 2006. Malta was the first member state to obtain approval for its NSRF. The strategy set out in the NSRF forms the basis of two programmes which each set out the framework within which Structural Funds and the Cohesion Fund to be spent in Malta and Gozo between 2007-2013. These are:

- Operational Programme I (OPI) – Investing in Competitiveness for a Better Quality of Life. This OP focuses on the European Regional Development Fund and the Cohesion Fund.
- Operational Programme II (OPII) – Empowering People for More Jobs and a Better Quality of Life. This OP focuses on the European Social Fund.

As can be seen from Figure 2 below, Social Inclusion policy is a core theme in NSRF and is frequently mentioned as an integrative orientation for the use of EU funds. It is actually given prominence as Strategic Objective 3, which it shares with 'Education and Employment' and 'Institution Building', both of which are essential for comprehensive social inclusion policy implementation. It accordingly features in numerous sections of the NSRF, besides being discussed in its own right, where emphasis on the interrelationship between education and training, job availability, and the need to avert risk-of-poverty are discussed.¹⁶

Social Inclusion policy is sustained primarily through OPII which has been translated into numerous projects to enable improvements in education, and especially through Malta's Employment and Training Corporation (ETC) to encourage both individuals and employers to maximise the utilisation of available human resources, most especially female activity, through various support schemes. Effectively Malta has sought to optimise EU funds availability and is one of the highest users of available funds.¹⁷

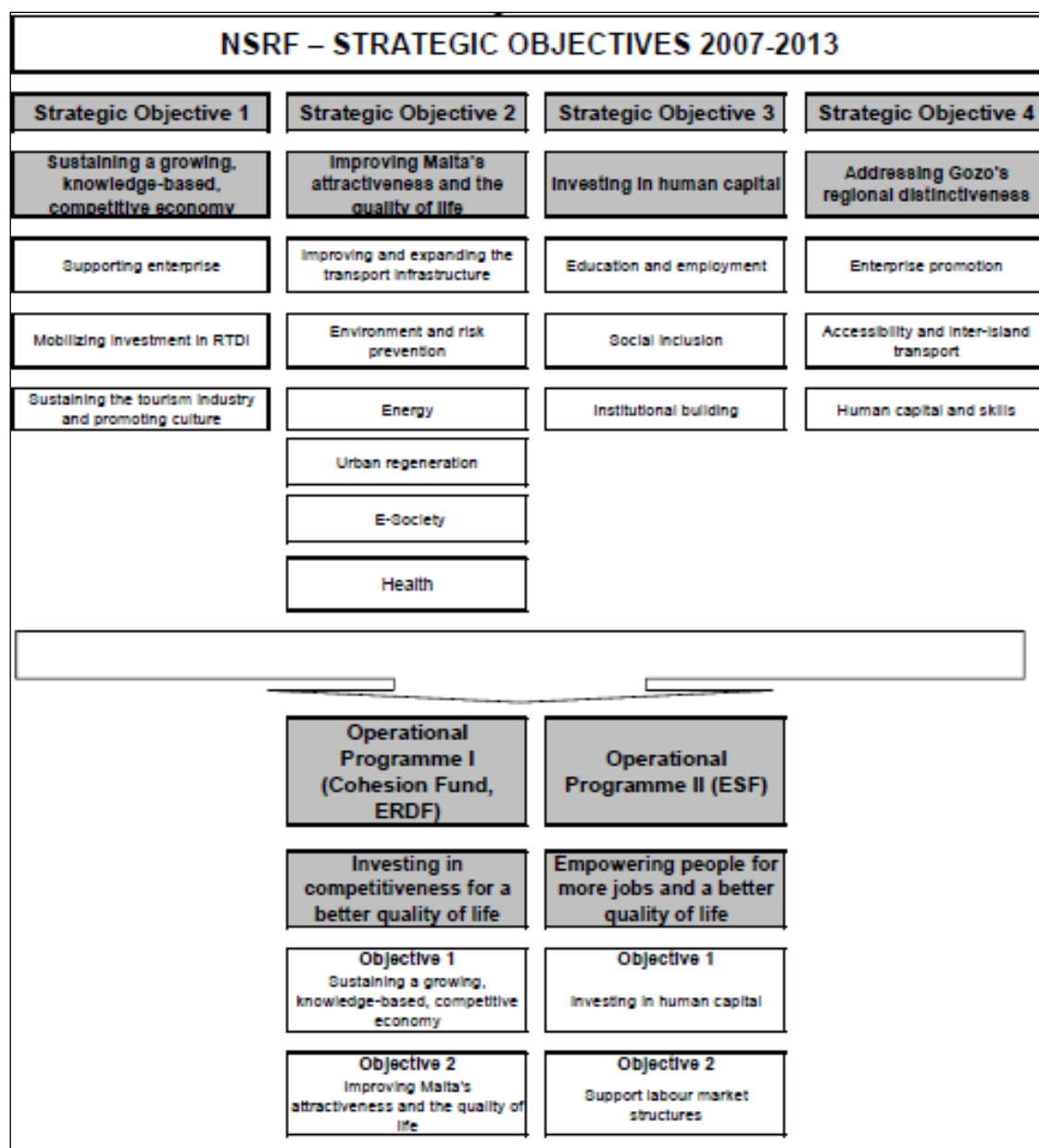
¹⁴ There are two Structural Funds during the 2007-2013 period, namely: the European Regional Development Fund (ERDF) and the European Social Fund (ESF). These funds are complemented by the Cohesion Fund. The Structural Funds and the Cohesion Fund are the main financial instruments of Cohesion Policy.

¹⁵ The full document can be accessed from http://www.ppcd.gov.mt/07_13?l=1.

¹⁶ NSRF p. 88 et seq.

¹⁷ A full list of approved projects, for both Operational Programme I and Operational Programme II can be accessed from http://www.ppcd.gov.mt/projects_07_13.

Figure 2: Social Inclusion as Integrated in the Four Strategic Objective in Malta's NSRF



Source: Malta NSRF 2007-2013, p.98.

4.3 Monitoring and evaluation

Financial monitoring and evaluation of projects run with the support of EU funds is constantly monitored by the Planning and Priorities Coordination Department (PPCD), which forms part of the prime minister's office. The status of individual project is in turn monitored by the Programme Implementation (Social Affairs) Directorate within The Ministry of Justice, Dialogue and the Family which works closely with other ministries, like that of Education, on projects whose main responsibility lies with these ministries. In effect end of 2011 status reports were produced.

In the consultation document for the NRP 2012,¹⁸ published in March 2012, a progression report on measures taken as part of the NRP 2011 were also given.

However, what needs to be emphasised is that monitoring and evaluation in Malta still lacks the scientific set-up that can produce holistic evaluations, cost-benefit analysis and to introduce an element of scientific experimentation. Status report are very important, as is detailed financial auditing, but from a policy point of view much else is needed. Lack of staff and resources make this impossible at present, and transfer of technology and the establishment of fully manned and resourced research units are essential if constant, preferably action-research initiatives, are to be undertaken on a regular basis.

¹⁸ Ministry of Finance, the Economy and Investment. March 2012. *Malta's National Reform Programme Under the Europe 2020 Strategy - Public Consultation Document*. Accessible at <http://finance.gov.mt/image.aspx?site=MFIN&ref=NRP%20Consultation%202012>. Accessed on 20 June 2012.

5. The future: recommendations

5.1 General recommendations

Foremost of all, for all the current and future effort to have a long lasting effect, action must be accompanied by research at all its stages, starting from concept analysis (which itself should be triggered by needs research) throughout implementation and, on conclusion, as post-analysis. Without research, decisions will continue to be taken on the basis of, at best, qualitative information and, at worst, as a result of sporadic ideas entertained by politicians and policy makers. Research, properly funded can take two forms: either internally through the government's own resources or through externally through regular commissioning of data analysis by academics and researchers who do not form part of government. A research component should be an essential component of each project.

It is firmly believed that proactive action can only be based on scientific research not only of the fact of poverty, but what causes it. In particular, if an action-research component is inbuilt into each and every project, it can be fine-tuned to ensure that the targets are being met before it is too late, and that the target audience is actually benefiting from action. Fact based analysis is much more efficient to implement strategy and to ascertain quality and efficiency in delivery systems.

The second priority action regards dissemination of information. Malta is blessed by its sheer size, which allows easy communication and in which even the gossip system can at times be quite efficient to disseminate information. But despite the good penetration of internet, and other e-services, it is often the case that persons who require most knowledge about existing services actually do not know where to knock and what to ask for. Drop-in centres like ACCESS¹⁹ are practically useless in this regard. Only outreach initiatives can be truly effective. More community based information services, manned by knowledgeable and well-trained persons, are required as a form of outreach to those in need of services. Retired social workers, with all the experience and skills that otherwise remain untapped, could easily be recruited back to offer these essential services and to guide the less knowledgeable through the bureaucracy. In this respect, even grandiose plans aimed at specific groups may actually not have the desired effect if they are not known and used by the target beneficiaries. A detailed, target-specific set of models will contribute to strengthening an integrated comprehensive active inclusion strategy much more than a one-fits-all model, as was being proposed when the ACCESS project was launched.

5.2 Specific recommendations by strand

a) Adequate income support

- Revise minimum wage
- Peg the pension of those who keep working after the current obligatory retiring age to the level of those who retire at the same time, and not to the level obtaining when the individual reached his/her obligatory retiring age
- Remove the obligatory retiring age. Retirement should not be compulsory at a particular age if a person is willing and able to continue in his job. Make retirement obligatory because of age discriminatory (as in the UK).

¹⁹ A Peer Review of ACCESS was conducted in 2007. Details on the project can be accessed through <http://www.peer-review-social-inclusion.eu/peer-reviews/2007/access-cottonera-community-resource-centre/>. Accessed on 20 June 2012.

b) Inclusive labour markets

- Ensure that immigrants receive training and cultural orientation to avoid exploitation
- Provide the private sector with resources to enable it to actively promote family-work balance facilities

c) Access to quality services

- Organise outreach initiatives for school leavers to entice them to improve their skills and qualifications
- Examine whether the 'second chance' secondary school in Naxxar has 'lost' its vocation as a second chance school to become a normal secondary school and if so, re-organise to provide structured second chance facilities
- Provide opportunities for training of individuals who want to improve their skills through 'open degrees', run both during the day and as evening courses for persons who have free time to attend (and who might not be able to do so only in the evening);
- Establish an Arts and Crafts facility manned by full time staff and not by the current group of part-timers who have no option but to register as unemployed outside term time.

5.2 EU level initiatives

- Introduce more schemes for transfer of technologies for research personnel to be available to governments in different member states to develop indicators and research strategies appropriate for their needs
- Provide ad hoc funds for inter-university collaboration on action-research on social inclusion issues.

Appendix A: Summary tables

Table 1

To what extent has an integrated comprehensive active inclusion strategy been developed in your Member State?												
	Comprehensive policy design			Integrated implementation			Vertical policy coordination			Active participation of relevant actors		
	Yes	Somewhat	No	Yes	Somewhat	No	Yes	Somewhat	No	Yes	Somewhat	No
For those who can work	X			X				X			X	
For those who cannot work		X		X				X			X	

Table 2

To what extent have active inclusion policies/measures been strengthened, stayed much the same or weakened since 2008 in your Member State?									
	Adequate income support			Inclusive labour markets			Access to quality services		
	Strengthened	The same	Weakened	Strengthened	The same	Weakened	Strengthened	The same	Weakened
For those who can work		X		X			X		
For those who cannot work		X		X			X		

