

Consultation on the European Pillar of Social Rights

Fields marked with * are mandatory.

Welcome to the European Commission's online public consultation on the "European Pillar of Social Rights".

Are our social rights fit for the 21st century? The Pillar will identify a number of essential principles to address the challenges in the field of employment and social policies.

We want to involve everyone in shaping the European Pillar of Social Rights. We welcome contributions from citizens, social partners, organisations and public authorities, so have your say!

Please submit your contribution below until the end of 2016.

I. Questions for the identification of the respondent

*** Are you replying as an individual or as an organisation?**

- Individual
- Organisation

What is the type of your organisation?

- Business
- EU level organisation
- National level organisation

Your EU level organisation is a(n)

- NGO
- Trade Union
- Employers organisation
- Think tank/academia
- Other

*** Name of your organisation or institution:**

500 character(s) maximum

European Disability Forum (EDF)

*** Respondent's first name:**

Laura

*** Respondent's surname:**

Marchetti

*** Respondent's email address:**

laura.marchetti@edf-feph.org

*** Postal address of your organisation or institution:**

500 character(s) maximum

Square de Meeus 35
1000, Brussels

Country

For individuals: country of residence.

For organisations: country where the organisation is based or country where the organisation's headquarters are.

Belgium

Register ID number (if you/your organisation is registered in the Transparency register):

If you would like to register, please refer to the following webpage to see how to proceed : <http://ec.europa.eu/transparencyregister/info/homePage.do>

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*** Your reply:**

- Can be published with your personal information** (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)
- Can be published in an anonymous way** (I consent to publication of all information in my contribution except my name/the name of my organisation and I declare that none of it is under copyright restrictions that prevent publication)
- Cannot be published - keep it confidential** (The contribution will not be published, but will be used internally within the Commission)

II. Questions for the consultation

The Commission invites all interested parties to reply to the questions set out in the questionnaire below, together with any additional comments, by 31 December 2016. (*See also [Commission communication "Launching a consultation on a European Pillar of Social Rights", COM\(2016\) 127 final](#)*)

On the social situation and EU social "acquis"

1. What do you see as most pressing employment and social priorities?

2000 character(s) maximum

- Ensuring the full implementation of the UN Convention on the Rights of Persons with Disabilities (CRPD) in existing and future employment and social policies
- Addressing the raising poverty and social exclusion of persons with disabilities across Europe
- Addressing socio-economic inequalities and discrimination of persons with disabilities in term of employment and access to the open labour market, as well as access to services and independently living in the community
- Addressing the high-level of unemployment, in particular of persons with disabilities, as well as ensuring the transition for persons with disabilities to find employment in the open labour market
- Addressing exploitation and forced labour, particularly of persons with intellectual and psychosocial disabilities
- Ending the adverse and retrogressive effects of the austerity measures had on persons with disabilities, particularly concerning adequate standards of living and provision of services
- Awareness raising among private and public employers about employment of persons with disabilities, in particular women with disabilities
- Establishing an adequate social protection floor for all with access to mainstream school systems, open labour market, support services and health systems
- Ensuring that European legislation on parental leave and reconciliation policies are considerate of the needs of parents of children with disabilities, and recognising the rights of informal carers of persons with disabilities

2. How can we account for different employment and social situations across Europe?

2000 character(s) maximum

While respecting the national competences in the provision and implementation of social policies, the different employment and social situations across Europe can be addressed by a EU-wide approach that focuses on the implementation of the CRPD, which was ratified by both the EU and 27 of its Member States. A full implementation of the CRPD, supported with an overarching strategy which mainstreams the rights of persons with disabilities in all policy fields, can be a powerful tool to account for different employment and social situations across Europe.

It is also important to re-think the approach taken to the economic crisis to prioritise social investment in adequate social protection systems (including adequate minimum income), quality and affordable services, and quality, sustainable jobs. This includes investing in services and acknowledging the positive impact that public social investments have on economic growth and social cohesion (i.e. high-quality community-based support services, supported employment, work-life balance and reconciliation policies and legislation supporting families along the life-cycle, accessible ICT services, etc...).

Similarly, these differences can also be accounted through an overarching, integrated anti-poverty and inclusion strategies at the EU and national level to achieve upward social conversion. Such initiatives should not prioritise macroeconomic priorities, but comprehensive social reform.

3. Is the EU "acquis" up to date and do you see scope for further EU action?

2000 character(s) maximum

The main concern with the acquis is that not all its instruments are properly implemented, such as the CRPD, the Europe 2020 Strategy, the Barcelona targets. Due to the focus on economic goals and the lack of effective monitoring tools, existing legal and policy provisions have not been adequately implemented.

The current acquis should be updated and reviewed to ensure full harmonization with the provisions of the CRPD. Equal treatment legislation should be revised to include third-country nationals in its scope, as well as not be limited to employment. People with disabilities are still discriminated in access to healthcare, education and services, which has a negative impact on their right to work and employment. The Social Pillar should take this into account and focus on social rights beyond employment. Employment legislation should also be revised to avoid any discrimination against workers with disabilities in their access to social protection systems (i.e. Regulation on Mobility of Workers).

Finally, the acquis should also be made more comprehensive through the adoption of new legislation, including: the introduction of an EU directive on adequate minimum income; the launch of a legislative proposal to develop a coherent framework for all types of parental leave to address inequalities between men and women in paid and unpaid work; the rapid adoption of the Equal Treatment Directive (COM(2008)426); the adoption of a European Accessibility Act that includes adequate accessibility provisions for people with functional limitations, as well as a legislation that protects the rights of vulnerable consumers.

On the future of work and welfare systems

4. What trends would you see as most transformative? [Please select at most three from the list below]

between 1 and 3 choices

- Demographic trends (e.g. ageing, migration)
- Changes in family structures
- New skills requirements
- Technological change
- Increasing global competition
- Participation of women in the labour market
- New ways of work
- Inequalities
- Other

Please specify:

Poverty and social exclusion

5. What would be the main risks and opportunities linked to such trends?

2000 character(s) maximum

Many people are at risk of poverty and social exclusion. This risk has increased following the implementation of austerity measures and is more prominent for people in vulnerable situations, particularly people with disabilities. Poverty and social exclusion lead to inequalities, which have increased by the lack of accessibility of new technologies. The main risk would be therefore to overlook the importance and linkages among these trends, which would lead to a vicious cycle of growing inequalities, poverty and social exclusion.

In order to take advantage of these trends, the EU must explore and act upon the links between austerity, poverty and social exclusion, and inequalities. The EU must also ensure that technological change does not prevent people from inclusively and meaningfully participate into society, but becomes a means to empower, respect and implement human rights. Reducing inequalities would also bring important savings in the long term, as underlined by the OECD and the ILO, while the costs of inaction would be very high.

The Social Pillar should include a more holistic view which is not only focused on employment, but also social rights. This can be done by guaranteeing adequate income support, a social protection floor for everyone and universal access to quality, affordable and accessible services.

6. Are there policies, institutions or firm practices – existing or emerging – which you would recommend as references?

2000 character(s) maximum

The CRPD certainly can serve as a good, strong reference to start. Last year the EU was also reviewed by the CRPD Committee and received recommendation on how to better implement the CRPD. The recommendations give clear guidance to the EU on how to better promote, protect and ensure the rights of persons with disabilities in the EU, which would also benefit society as a whole.

Other instruments are:

- The European Charter of Fundamental Rights
- The Active Inclusion Recommendation of 2008, promoting integrated approaches that combine adequate income support, universal access to affordable, quality services, and personalized support towards quality jobs and inclusive labour markets
- The Social Investment Package
- European Structural and Investment Funds, including having non-discrimination and accessibility as horizontal principles, and earmarking of 20% of ESF for the fighting against poverty and social exclusion
- The Youth Guarantee as a model, although with a different implementation
- The Council of Europe Convention on preventing and combating violence against women and domestic violence
- Sustainable Development Goals
- European non-discrimination legislation
- The Marrakesh Treaty

However, the meaningful and adequate implementation of these instruments highly depends on the willingness of Member States to take effective action. This is why the EU should adopt binding legislative instruments when feasible, ensure that existing, binding legislation is adequately implemented and improve the implementation, monitoring and accountability of soft-law initiatives. Additionally, human rights should be safeguarded in all policy fields, including taxation, trade, competition, education, etc.

On the European Pillar of Social Rights

7. Do you agree with the approach outlined here for the establishment of a European Pillar of Social Rights?

- I strongly agree
- I agree
- I disagree
- I strongly disagree

Please specify:

2000 character(s) maximum

EDF welcomes any action from the EU which seeks to strengthen commitment to, and implementation of social rights within the EU. Yet the approach outlined fails to include important aspects, thus EDF recommends to:

- Mainstream the rights of people with disabilities throughout the Social Pillar in line with the CRPD
- Specify the legal nature of the Social Pillar and ensure that existing legal and policy instruments are fully integrated in the final text; specify how implementation will be measured and include an accountability mechanism for the EU and the Member States
- Enlarge the scope of the Social Pillar beyond Eurozone countries, EU citizens and legally residing third country nationals, to also include other individuals, i.e. undocumented migrants and refugees
- Include provisions on the direct involvement and consultation of persons with disabilities and their representative organisations in the implementation of the Social Pillar at the European and national level
- Include specific provisions on the protection from exploitation and forced labour of persons with disabilities, particularly among persons with intellectual and psychosocial disabilities, or persons deprived of their legal capacity
- Mainstream the rights of women and young people throughout the Social Pillar, including specific actions on women and young people with disabilities
- Ensure a social protection floor and a minimum income scheme throughout the Social Pillar in order to protect persons with disabilities from poverty and exclusion
- Ensure the free movement of people, particularly persons with disabilities, and the transferability of services across EU Member States
- Include provisions on deinstitutionalisation and the provision of community-based services
- Prevent adverse and retrogressive effects of the austerity measures on the adequate standard of living of persons with disabilities through the Pillar

8. Do you agree with the scope of the Pillar, domains and principles proposed here? (If you wish to provide detailed comments on any of the 20 domains, please see the section "Detailed comments by domain" below)

	I strongly agree	I agree	I disagree	I strongly disagree
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1. Skills, education and life-long learning	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Flexible and secure labour contracts	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Secure professional transitions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Active support for employment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Gender equality and work-life balance	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Equal opportunities	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
7. Conditions of employment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
8. Wages	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
9. Health and safety at work	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
10. Social dialogue and involvement of workers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
11. Integrated social benefits and services	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
12. Health care and sickness benefits	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
13. Pensions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

14. Unemployment benefits	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
15. Minimum income	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
16. Disability benefits	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
17. Long-term care	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
18. Childcare	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
19. Housing	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
20. Access to essential services	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Are there aspects which are not adequately expressed or covered so far?

2000 character(s) maximum

The rights of persons with disabilities are not adequately expressed and covered as they are limited to disability benefits. This still perpetuates an idea of disability based on a medical model and is not in compliance with the rights and principles of the CRPD, which the EU has an obligation to implement.

There is an excessive focus on employment and employability of people, including on issues related to gender equality and equal opportunities. This does not take into account other grounds of discrimination, or the prevention and protection from exploitation and forced labour. Moreover, earning a wage is not always sufficient to protect employed people from experiencing poverty and social exclusion, and it does not take into account that some people might not be able to work. The Social Pillar should also cover the setting of a social protection floor and a minimum income scheme to safeguard rights beyond employment.

Civil dialogue and the meaningful involvement of people, including people with disabilities and their representative organisations, should be included. This would be in accordance with article 11 of the Treaty on the EU and article 4.3 of the CRPD.

Other missing aspects are the link between the Social Pillar and existing legal instruments and policies, as well as clear and planned implementation and monitoring structures for the Social Pillar. Similarly, there is also no mention to taxation nor to the financing of our social protection systems and of quality, affordable and accessible services – an aspect that should receive specific attention since they constitute key investments in the long term.

Finally, the Social Pillar should have a wider scope Eurozone countries, EU citizens and legally residing third country nationals, to also include other individuals, i.e. undocumented migrants and refugees.

9. What domains and principles would be most important as part of a renewed convergence for the euro area? (Please select maximum 5)

between 1 and 5 choices

- 1. Skills, education and life-long learning
- 2. Flexible and secure labour contracts
- 3. Secure professional transitions
- 4. Active support for employment
- 5. Gender equality and work-life balance
- 6. Equal opportunities
- 7. Conditions of employment
- 8. Wages
- 9. Health and safety at work
- 10. Social dialogue and involvement of workers
- 11. Integrated social benefits and services
- 12. Health care and sickness benefits
- 13. Pensions
- 14. Unemployment benefits
- 15. Minimum income
- 16. Disability benefits
- 17. Long-term care
- 18. Childcare
- 19. Housing
- 20. Access to essential services

Comments:

2000 character(s) maximum

Achieving upwards convergence in these domains would guarantee every person's fundamental right to live a life in dignity and fully participate in society. A powerful tool to achieve this would be the CRPD as it is a comprehensive piece of legislation addressing all levels and areas of policy making.

This is why EDF asks the EU to:

- Ensure that the CRPD and its Concluding Observation are fully implemented and monitored by the adoption of a Disability Agenda for the 2020-2030 period to mainstream the rights of persons with disabilities in all policy areas
- Adopt the Equal treatment Directive (COM(2008)426) to close the gap in protection against discrimination in access to goods and services, which is an essential complement to equal treatment in employment and occupation
- Ensure a right-based and non-discriminatory universal access to quality and affordable services and care, social, health, housing, education and life-long learning services in an integrated approach, as well as adequate funding to allow free choice of care options (including support to informal carers), peers support and home schooling
- Support a progressive raise in the levels of minimum wages and adopt an EU framework directive on adequate minimum income schemes
- Ensure the existence of adequate unemployment benefits schemes in all Member States that are not linked to negative conditionality, are accessible to job-starters and to non-standard forms of employment and are set at higher levels than adequate minimum incomes.

10. How should these be expressed and made operational? In particular, do you see the scope and added value of minimum standards or reference benchmarks in certain areas and if so, which ones?

2000 character(s) maximum

Budgetary discipline should not take precedence over human rights and social investments, thus budgetary flexibility should be granted to Member States to allocate adequate funding for investment in social policies and services. Moreover, the Social Pillar should not only prominently focus on employment, but on social rights.

The Social Pillar should be made operational by prioritising the implementation and monitoring of binding pieces of legislation (i.e. the CRPD, the European Charter of Fundamental Rights, the Employment Equality Directive, etc.). Where binding legislation is not present, benchmarks should be developed and integrated into existing governance frameworks.

There is also a need to ensure a better implementation of existing relevant policy frameworks, such as EU2020, the Sustainable Development Goals, the European Structural and Investment Funds, the Social Investment Package or the Active Inclusion Recommendation.

Detailed comments by domain

If you wish to provide detailed comments on any of the domains, please select one or more from the list below and fill the table(s) and comment box(es) underneath. (A detailed description of the domains and principles is available in the [Annex "A European Pillar of Social Rights - Preliminary Outline"](#) to the [Commission communication "Launching a consultation on a European Pillar of Social Rights", COM\(2016\) 127 final](#)).

- 1. Skills, education and life-long learning
- 2. Flexible and secure labour contracts
- 3. Secure professional transitions
- 4. Active support for employment
- 5. Gender equality and work-life balance
- 6. Equal opportunities
- 7. Conditions of employment
- 8. Wages
- 9. Health and safety at work
- 10. Social dialogue and involvement of workers
- 11. Integrated social benefits and services
- 12. Health care and sickness benefits
- 13. Pensions
- 14. Unemployment benefits
- 15. Minimum income
- 16. Disability benefits
- 17. Long-term care
- 18. Childcare
- 19. Housing
- 20. Access to essential services

1. Skills, education and life-long learning

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

The challenges outlined are valid but the proposal fails to mention groups in vulnerable situations such as persons with disabilities or migrants. It also fails to include the development of inclusive education systems, training of staff, accessibility, freedom of movement and portability of services. The Social Pillar should promote participation of persons with disabilities in EU exchange programmes, ensure the provision of more accessible information on accessibility and reasonable accommodation, and guaranteeing that persons with disabilities have the same level of social protection in different EU Member States to freely move within the EU. The Social Pillar should lay down the principle of portability of services for persons with disabilities wishing to live, work and study across the EU.

The EU should fund research on accessible pedagogical material and reasonable accommodation in education, paying special attention to children in need of high level support.

This domain should contain a more holistic view on education and include a clear reference to articles 24 and 18 of the CRPD, articles 28 and 29 of the UN Convention on the Rights of the Child, and it should be fully embedded in the final draft of the Social Pillar. and the existing Education and Training 2020 framework of the EU, which contains benchmarks that must be met by 2020, such as the reduction of the rate of early leavers from education and training aged 18-24 below 10%, or the increase of the rate of adults participating in lifelong learning to at least 15%. The key role civil society organisations play in the provision of education and lifelong learning services should also be better recognised and supported.

The Social Pillar must also ensure more budgetary flexibility for investment in education to recognise the long term positive impact of investment in education on economic growth and ensure that they are are not undermined by cuts in public expenditure.

2. Flexible and secure labour contracts

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

As presented right now, the emphasis is more on flexibility rather than on security of labour contracts. Yet, every form of employment has to respect fundamental principles of quality, including accessibility and reasonable accommodation, adequate level of remuneration, access to social protection provisions and contributions, possibilities of progression in employment, prevention and protection from forced labour and exploitation. In general, flexibility in the labour market must be compensated by adequate social security or other forms of retribution, so that the worker does not end up paying the costs.

Clear distinction must also be made between voluntary part-time working or flexitime for work/life balance, and zero hour contracts, or forced part-time working. This section should also address and recognise the rights and work of formal and informal carers.

3. Secure professional transitions

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

This section does not specify how to provide secure professional transitions, but only focuses on flexibility. While important, EDF strongly believe that this section must have a clear reference to accessibility and reasonable accommodation.

It should also make a clear reference to people in a vulnerable situations, including people with disabilities, women, older people, migrants, refugees, and ethnic minorities.

The issue of re-entering the labour market after periods of care or other interruptions should also be taken into account and addressed with appropriate reintegration schemes.

4. Active support for employment

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

As described in the current draft, the challenges of active support to employment have a too narrow focus. First of all, the generalisation leaves out the situation of persons with disabilities seeking supported employment in the open labour market. This section must therefore make a clear reference to article 27 of the CRPD and must propose effective and inclusive ways to implement it. Since active support in employment can be achieved through accessibility and reasonable accommodation, this section should also refer to article 9 and 19 of the CRPD.

More in general, the section must take into account the specific obstacles faced by other groups who are furthest away from the labour market, such as single parents, informal carers, migrants and people from ethnic minorities, older people. Active support to employment can only be considered effective if it is person-centered and tailored to the needs of the individual, thus this should be reflected in this section.

The role of employers in active support to employment must also be stressed. Awareness raising among private and public employers about active support to employment of persons in vulnerable situations, including persons with disabilities, in particular women with disabilities and mothers of children with disabilities, must be included in the Social Pillar.

5. Gender equality and work-life balance

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

This section should make a clear reference to article 6 of the CRPD and the rights of women with disabilities. The Social Pillar should be used to implement effective measures in order to mainstream disability in gender policies, programmes and measures, as well as to design and develop specific positive action measures to achieve the advancement of women and girls with disabilities in the EU.

Gender equality should not be addressed only in relation to employment and access to the labour market, but in a more holistic manner. The rights of girls and women with and without disabilities should be integrated in all domain of the Social Pillar, including all aspects of health and long-term care policies and services, access to goods and services.

In relation to employment, the Social Pillar should acknowledge that women often take up the role of informal cares to family members and persons with disabilities and it should guarantee the right to pension benefits after retirement. Similarly, female (undocumented) migrants and care workers, irrespective of their status, should not suffer from unequal treatment in terms of pay, working conditions and access to social security.

Strong and effective reconciliation measures should be put in place to ensure to promote the equal sharing of responsibilities and encourage men to benefit from parental leave. The Social Pillar should better address the issue of work-life balance policies and legislation to support families along the life-cycle by guaranteeing sufficient leave schemes and flexible working arrangements, setting and monitoring the provision of quality affordable and accessible care services for children, elderly and family members with disabilities and support the revision towards fiscal systems which promote more equality and non-discrimination of different family forms.

6. Equal opportunities

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

Non-discrimination should be applied as an overarching principle. The EU's anti-discrimination legislation is inconsistent in its scope and creates a hierarchy between the different grounds of discrimination. Persons with disabilities are only protected against discrimination in employment and vocational training. This should be addressed within the Social Pillar by covering equal opportunities beyond employment. It should also take specific account of multiple and intersectional discrimination and ensure its compliance with the CRPD, in particular the recognition that the denial of reasonable accommodation is a form of discrimination.

Moreover, alongside discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation, discrimination based on socio-economic background also deserves specific attention. Further, migrants and refugees should also be covered by protection against discrimination.

Adopting the Equal treatment Directive (COM(2008)426) to close the gap in protection against discrimination in access to goods and services is essential and should be a goal of the Social Pillar.

The Social Pillar should also cover the promotion of rights-awareness and knowledge on relevant procedures to claim rights or seek redress on rights violations.

7. Conditions of employment

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

The section addresses the right to clear information for employees, yet it fails to mention the right to accessible information as enshrined in article 9 of the CRPD. Moreover, the section must include accessibility and reasonable accommodation as fundamental conditions of employment, as well as the clear mention of article 27 of the CRPD.

Conditions of employment must be based on quality of work and employment and include that all workers are entitled to receive a fair salary to lead a dignified life. Additionally, conditions of work must also include right-awareness, health and safety at work, adequate benefits, adequate training workers in a lifelong learning perspective, and unemployment benefits. Finally, the issue of non-discrimination on any ground should be at the heart of any action related to conditions of employment.

8. Wages

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

While agreeing with the principle and challenges described, EDF believes that this section should be more detailed in specified how adequate wages are to be set. It should also take into account that wages should be sufficient for a family and the individual's needs.

Minimum wages should be set in a non-discriminatory way and irrespective of contract type. Discriminations based on age or gender are not tolerable, and strong action is needed to close the gender pay gap. Workers with disabilities and workers in a disadvantaged situation should also receive minimum wage on an equal basis as others.

9. Health and safety at work

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

The provision of reasonable accommodation must be included in this section as it is a key condition to adjusting the workplace in order to meet the needs of individuals and guarantee their health and safety at work.

This section should have a clear mention of articles 26 and 27 of the CRPD. Habilitation and rehabilitation services should be included as means to help persons with disabilities have access to the open labour market and supported employment. High quality services should be promoted and guaranteed by the Social Pillar. Persons with disabilities, and in particular persons in need of high level support, may benefit from tailor made habilitation and rehabilitation services promoting inter alia early intervention.

10. Social dialogue and involvement of workers

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

Social dialogue and involvement must not be limited to social partners and workers, as also state in article 11 of the TEU. Again, the Social Pillar must focus on social rights beyond employment. Moreover, this section must also include the active involvement of persons with disabilities and their representative organizations as enshrined in article 4.3 of the CRPD. By and large, the Social Pillar must include the active involvement of civil society organisations representing different groups of individuals, including women, children, older people, persons from ethnic and religious minorities, migrants and refugees, and people in vulnerable situations.

11. Integrated social benefits and services

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

This section should focus on ensuring adequate support to the beneficiary and quality of integrated social benefits and services. Moreover, the principle of integration between benefits and services should be mainstreamed beyond employment. Access to services and benefits should also be included in the section, and it should also be specified that eligibility and conditionality criteria do not result in punitive approaches, thus leading to a reduction in access to benefits and services.

Services and benefits are key means to ensure that each individual can live an independent and dignified life. For this reason, it is vital that this section mentions article 7 and 19 of the CRPD.

Integrated social benefits and services should not stop at the board and the Social Pillar should also ensure that persons with disabilities will not be prevented from enjoying their right of free movement by restrictions in services and benefit.

12. Health care and sickness benefits

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

This section should make a clear reference to article 25 of the CRPD. It should also recognise that persons with disabilities face higher risks of discrimination in access to healthcare and should address this issue by the adoption of the Equal Treatment directive to prevent discrimination in healthcare. The Social Pillar should facilitate equal access to disability specific health care services for persons with disabilities, as well as to mainstream services, such as dental and eye care, sexual and reproductive health and preventive services, including telemedicine.

The Social Pillar must promote the development of guidelines on free and informed consent and training of health care professionals on disability awareness and provision of reasonable accommodation, with a particular attention to women, children, older and LGBTI persons with disabilities and to persons with disabilities who have communication difficulties. The Social Pillar should promote the prevention and health promotion campaigns in accessible formats, with special efforts to reach specific groups of persons with disabilities with evident health disparities, such as women with disabilities and persons with intellectual disabilities. People with disabilities may have a greater need for sickness benefits and this needs to be taken into account to prevent financial inequalities or dismissal from their jobs.

Finally, the Social Pillar should ensure that persons with disabilities travelling to another EU Member State for health care can rely on a European cross-border benefit package including treatment of chronic disabilities as well as an accessible, reliable and effective complaints and redress body.

13. Pensions

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

This section does not address the challenge of making labour markets inclusive and accessible for people with and without disabilities as the retirement age increases, nor it addresses the issue of those sectors in which it is not suitable to work after a certain age. Similarly, it should also take into account that some people might not be able to work, thus the approach to pensions should be addressed from a perspective that goes beyond employment and take into account adequate standards of living and social protection floor, as enshrined in article 28 of the CRPD.

This section should also include a specific mention to persons with disabilities who might need additional support with ageing. In general, adequacy and coverage should have a more prominent role in this section.

14. Unemployment benefits

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

The first preliminary outline of the Pillar focuses too much on the conditionality and puts too little emphasis on the adequacy of unemployment benefits. Unemployment benefits are one of the means to ensure an inclusive society and should go hand in hand with adequate standards of living and social protection. It is also important to include that unemployment benefits should be extended to self-employed workers. This section should also mention that the provision of unemployment benefits to persons with disabilities should not trigger the withdrawal of other benefits (i.e. disability benefits).

The Social Pillar should also take into account the situation of younger people, with and without disabilities. In some Member States, to receive unemployment benefits, young people have to have contributed to the unemployment benefit system via employment for a minimum period of 12 months. This one-year period is extremely difficult to achieve for young people who often have to do several internships or short-term jobs before getting a first stable job. Access to social benefits should be ensured to job-starters' reality, self-employed and non-standard forms of employment.

15. Minimum income

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

The Social Pillar should lay the ground for the adoption of a directive on minimum income schemes with article 153, 1 (h) TFEU as a legal basis. The right to an adequate minimum income is a fundamental right and enables people to live a life in dignity, support their full participation in society and ensure their independence across the life cycle.

The framework directive should set common methodologies for defining adequacy (e.g. 60% of national median income, material deprivation or reference budgets) and common approaches to improve coverage and take-up, including common information requirements and the promotion of the principle of proactive granting of benefits.

It should ensure that minimum income schemes are developed, implemented and monitored with key stakeholders, including civil societies and disabled people's organisations. It should also promote monitoring and adjudication by independent national bodies and procedures in cases of disputes between the administration and recipients.

As it is now, this section negatively makes the receipt of benefits conditional on requirements to participate in activation and fails to recognise that some people, even if in the working age, cannot work, and also fails to recognise that there are different types of activation. This should be changed to ensure that the distinctive rights to adequate income support, quality services, and inclusive labour markets are respected.

16. Disability benefits

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

Although disability rights should not be limited to benefits and must be mainstreamed throughout the Social Pillar, this section must ensure that disability benefit are not withdrawn once (re-)entering employment. Similarly, it should also ensure that disability benefits are not withdrawn if unemployment benefits are applied.

Disability benefits should also be seen as one of the means for an inclusive society. This should go hand in hand with adequate standard of living of persons with disabilities, including by setting a social protection floor, which should clearly mentioned in the Social Pillar. Other means which need to be mentioned in this section are community-based services, accessibility and reasonable accommodation, and portability of services.

This section should also recognised that there is a tendency to tighten eligibility (including disability recognition criteria) and levels of benefits for budgetary savings. The EU should look into how disability is recognised by Member States and how disability benefits are designed and then provide guidance and good practices to ensure that every person who needs disability benefits is covered by national social security systems.

17. Long-term care

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

This section should ensure quality integrated care, respectful of individual choices and to move towards a community-based model of care. It should recognise the rights of informal carers, the need for a better balance between private and professional life, as well as better training, recognition of skills, a clear legal and contractual status, with fair wages and adequate social protection. It should also include the meaningful involvement of formal and informal carers and users in the design, test, implementation and evaluation of policies and services.

While acknowledging the importance of quality and affordable long-term care services, EDF also urges for the inclusion of article 19 of the CRPD in this section. Long-term care must be in line with deinstitutionalisation, the right to live independently and be included in the community. It should also include a clear reference to core concepts like dignity, individual autonomy, freedom of choice, and independence of persons.

Affordability and sustainability of long-term care should be addressed and defined, taking into account the circumstances of the individual and their family, particularly for people on low incomes.

18. Childcare

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

This section should make a clear reference to article 7 of the CRPD, Article 3 of the TEU, article 24 of the EU Fundamental Rights Charter and the Barcelona Targets. This section must also ensure participation of children, with or without disabilities, in matters which concern them, and define the rights of parents and carers.

This section only focuses on childcare, without taking into account quality and inclusive early childhood education and care, learning with educational and development objectives for the child, and support for children with special needs and their families.

This section should make a clear reference to the need of a comprehensive childcare and education systems, and community-based services against segregated ones. Services should be person-centred and adapted to meet the needs of the child and the family. The Social Pillar should ensure that European legislation on parental leave and reconciliation policies are considerate of the needs of parents of children with disabilities by providing additional support and flexibility in balancing their private, family and professional life.

19. Housing

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

This section should have a strong human rights based approach. While welcoming the focus on shelter and social services for homeless people, it should not present them as alternatives to adequate housing, but as temporary solutions leading to access to adequate housing. It is important to include a reference to the CRPD both for the provision of accessible and reasonable accommodation, as well as a reference to deinstitutionalisation and the need to promote independent living and inclusion in the community. The important link to health services is also missing from this section and it should be adequately included, with a specific reference to the prevention and recovery from mental health problems.

20. Access to essential services

	I strongly agree	I agree	I disagree	I strongly disagree
Do you agree with the challenges described?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the principle addressing those challenges in the right way?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Should the EU act to put in reality this principle?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments or additional suggestions? For instance: how to address these challenges in the right way? How should the EU act to put in reality this principle?

2000 character(s) maximum

Access to essential services should not be limited to the service, but it should also include the accessibility of the built environment. Moreover, the list of essential services described in the first draft of the Social Pillar is rather narrow and does not include all essential services (i.e. right to water and sanitation, social services, counselling and support services, addiction, over-indebtedness etc.).

Contact

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