****

**CONTRIBUTION TO THE EC CONSULTATION**

**ON**

**EU PILLAR OF SOCIAL RIGHTS**

**Social Services Europe** is the largest European umbrella organization representing non-profit social and health care providers. Our members are at the forefront of ensuring accessible, affordable and quality services for all people in Europe and believe that investing in people brings both social and economic returns. Social and health care services enable people to live with dignity and care but also support people to engage in economic activities that contribute to growth.

Below are the comments of SSE on **principle 11** of the Pillar of Social Rights concerning integrated service provision which is one of the principal topics of the work of SSE.

* **Content**
* SSE wants to point out that in several member states there is not so much a problem of multiplicity of services and benefits, but a problem of absence and/or inadequacy.
* SSE is concerned about too strong/sole focus on employment as objective of integrated service provision. Integrated service provision is key to effectively support vulnerable groups – even if employment is not an (immediate) output.
* SSE is concerned that social services and social benefits are too often *communicating vessels*, and that cuts in cash benefits are justified by investment in in-kind benefits or vice-versa. A more sophisticated approach to cost-efficient integrated services is necessary.
* Integrated service provision often requires a change of culture amongst service providers and their staff, and therefore significant investment in (re)training and education will be required.
* SSE is convinced that the best way to develop better integrated services is to empower the client/user to choose/arrange its own service package.
* SSE believes that some efficiency gains are possible in the way services are provided, but warns for overly optimistic calculations of the cost-benefit return of integrated service provision.
* SSE agrees that coverage and adequacy of benefits are important issues. Too many benefits fall short of bringing their beneficiaries to the at-risk-of-poverty threshold, and some of the most vulnerable people do not take up benefits to which they are entitled because of administrative and other hurdles.
* SSE wants to point out that the right to integrated services is a human right integrated into transnational human rights treaties such as the Council of Europe’s revised European Social Charter. We would like to refer to the jurisprudence related to art 30 and art 15 of the revESC in particular which form the basis of articles 26 and 34 of the EU Fundamental Rights Charter. It could be a source of European bench marking.
* SSE welcomes the work of the EU on the integration of people with disabilities, children, and older people, but wants all target groups to be covered by EU policies related to the promotion of integrated service provision. Too many groups such as ex-prisoners, people with mental health problems, homeless people are overlooked by EU policy makers and could benefit hugely from a more integrated and ambitious social support framework.
* In the current context of rapidly growing housing exclusion and forms of extreme poverty, it is absolutely vital to ensure that people do not risk to lose the housing support when entering the labour market, that people do not get their housing support withdrawn as a penalty for not living up to the conditions linked to social benefits, and that people living in institutions (prison, hospital, youth care, asylum centers, mental health facilities,…) are not discharged into destitution.
* Access to housing is a key element of integrated service provision, but too often overlooked/ignored in EU/national policies. The importance of housing has only increased in a context of growing emphasis on care in the community and deinstitutionalization.
* **Concrete actions**
* SSE wants to become a European knowledge platform on integrated service provision. We want to identify and promote the most promising innovative practices for the target groups our members work with, including people with disabilities, people with chronic diseases, people experiencing poverty including the homeless, older people, and migrants/refugees. As SSE has a direct connection with 100.000s of social services including some big social service providers which can act as levers, we are convinced that the knowledge platform can have some real policy impact. SSE would need some modest financial support from the European Commission to set up the platform. Once it works, we are confident that other funders would be interested to invest as well in the platform.

*Principle 11 of the Pillar of Social Rights: Integrated social benefits and services*

*In some cases, the multiplicity of benefits and services, agencies, and application procedures make it difficult for people to access all the support that they need. Lack of integrated benefits and services also reduces their effectiveness in addressing poverty, as well as supporting social and labour market integration. A three-fold alignment between social benefits, active support and social services is key to effective support. Such alignment should concern eligibility and coverage, coordinated offers of support and maintaining some entitlements when re-entering work or self-employment. Better integration of benefits and services can improve the cost-effectiveness of social protection.*

*Social protection benefits and services shall be integrated to the extent possible in order to strengthen the consistency and effectiveness of these measures and support social and labour market integration.*