



**European Commission releases proposal for the European Child Guarantee
– What’s in it for Europe’s Roma¹?**

On 24 March 2021, the European Commission released a proposal for a Council Recommendation establishing the [European Child Guarantee](#). The **EU Strategy on the Rights of the Child 2021-2024** was released in the same time, and ERGO Network prepared a separate response to that initiative. The European Child Guarantee aims at providing Member States with guidance and means **to support children in need and break the cycle of poverty and social exclusion** across generations, through ensuring effective access to healthy nutrition and adequate housing, as well as free early childhood education and care, free education and school-based activities, free healthcare, and at least one free healthy meal a day.

ERGO Network has engaged closely in lobbying and advocacy around this initiative, also as part of the [Investing in Children EU Alliance](#), to ensure that Roma children and their specific concerns are included in the proposal. Read our full [Input to the European Commission consultation on the Roadmap for a Council Recommendation for a Child Guarantee](#) (October 2020).

¹ The umbrella term “Roma” encompasses diverse groups, including Roma, Sinti, Kale, Romanichels, Boyash/Rudari, Ashkali, Egyptians, Yenish, Dom, Lom, Rom and Abdal, as well as Traveller populations (gens du voyage, Gypsies, Camminanti, etc.), in accordance with terminology used by the [European Commission](#).

ERGO Network warmly welcomes that “children with a minority racial or ethnic background (particularly Roma)” are explicitly mentioned in point (5) of the proposal for a **Recommendation**, referring to the groups of children in need identified as being at a specific disadvantage for the scope of the Child Guarantee. This inclusion is all the more significant given that the original [Roadmap](#), released by the European Commission in 2020, did not include any reference to Roma children at all, much less did it point to them as a priority intervention group. Roma children are further mentioned in Recital 20 of the same proposal, in the context of their higher early school-leaving rates. “Children... with a minority racial or ethnic background”, without naming the Roma specifically, are also highlighted in Recital 24 as being at a higher risk of experiencing housing deprivation. All these references are very positive.

The **EU Strategic Framework for Roma Equality, Participation and Inclusion** is referred to in the **Explanatory Memorandum** accompanying the Proposal for Recommendation (released as part of the same document), thus strengthening the link between the two processes. Unfortunately, **this link is not reprised in the text of the proposal for a Council Recommendation** itself. In the Memorandum, there are several other explicit referenced to Roma children, once again clearly identified as key priority group for the application of the Child Guarantee. The Memorandum reaffirms that **Roma children experience poverty rates up to three times higher** than the majority population. It also speaks about the need to **combat specifically discrimination against Roma children** (without using the term antigypsyism though), as part of an effort “to ensure that children with a minority racial or ethnic background have equal access to education and that teachers are trained to work with all children and be sensitive to the needs of pupils from different backgrounds.”

Regrettably, the fight against discrimination on all grounds, including racism and antigypsyism, is not an explicit objective in the European Child Guarantee, and no specific actions are associated with it. This is a glaring missed opportunity. In the proposal for a Recommendation, Recital 20 mentions discrimination alongside segregation only about children with disabilities or with a migrant background, but not with regards to any other categories of children in need.

More encouragingly, point (7) clearly states that “measures **to promote inclusion and to avoid and tackle discrimination and stigmatisation**” must be part of the integrated and enabling policy framework that Member States are invited to build. Finally, point (11) speaks of the need to involve bodies dealing with non-discrimination, such as National Equality Bodies, in the implementation of the Child Guarantee.

In our view, it is unfortunate that the Child Guarantee only **marginally reaffirms the commitment of the European Pillar of Social Rights to mainstream equal opportunities in all relevant policy fields**. Discrimination is an important deterrent to wellbeing, both in itself, leading to emotional distress and isolation, as well as in impeding effective access to income and services. In the Explanatory Memorandum, while several barriers to accessing services are acknowledged (affordability, availability, accessibility, lack of information, administrative barriers), discrimination is not one of them, despite the Feasibility Study on the Child Guarantee clearly indicating stigma and discrimination in its conclusions. While we very much welcome the paragraphs on the implementation of the EU Anti-Racism Action Plan, the EU Racial Equality Directive, and the EU Roma Framework, **a clear commitment to fight all forms of discrimination, segregation, bullying, and racism (including antigypsyism) is not mainstreamed** throughout the approach. Equally, disaggregated data collection, including by ethnic origin, is not mentioned.

In addition to those mentioned above, the proposal also makes **very important, clear links with other key policy processes and frameworks at the EU level**, such as the European Semester (including the Country-Specific Recommendations), the European Pillar of Social Rights, the Recovery and Resilience Facility, the Investing in Children Recommendation, and the Sustainable Development Goals. These will be crucial for policy coherence and effective implementation. While **a number of other very important initiatives are mentioned in the Explanatory Memorandum**, they are disappointingly not reprised in the proposal for Recommendation – for example the EU’s strategies on gender equality, LGBTQI+, and disability, the Youth Guarantee, the Migration Action Plan, the Recommendations on Active Inclusion, Long-Term Unemployment, and Access to Social Protection, or the Directive on Adequate Minimum Wages.

ERGO Network response to the European Child Guarantee

Overall, ERGO Network very much welcomes that the approach is explicitly rooted in **combatting child poverty and social exclusion, with a focus on children’s rights and wellbeing**, rather than on the economy or their potential as ‘human capital’. The proposal for a Recommendation includes strong references to breaking the cycle of disadvantage in a rights-based approach, while quality and inclusiveness are consistently mentioned dimensions. The **impact of Covid-19 on family incomes and distance learning, including the digital divide**, is very clearly defined in Recital 25. Furthermore, an “integrated, person-centred and multidimensional approach” is put forward, with “performing outreach activities” explicitly mentioned (11 d). Both these axes of intervention are very important for Roma children facing complex disadvantages. The Explanatory Memorandum clearly underpins child poverty by the composite AROPE indicator, while pointing out that making services cost-free is an important tool to maximise access.

It is **very positive that the proposal supports a broad view of providing wrap-around support for parents, acknowledging that there are no poor children in rich families**. While the focus of the Child Guarantee itself is to provide children with access to services, there are several welcome references to investments in social protection and **providing income support and labour market assistance to parents**, as part of the enabling policy framework Member States need to enact. Recital 16 also says that Member States should either provide such services or “adequate benefits so that parents or guardians of children in need are in a position to cover for these services”.

The **proposals on education are very comprehensive and important for Roma children**, including tackling financial and non-financial barriers to education, preventing and reducing early-school leaving, providing learning support, educational materials, and at least one healthy meal a day, digital support, transport, school-based activities. The Recommendation clearly states that education should be of quality and inclusive. However, once again, **nothing is said about segregation** (except for children with disabilities or of migrant origin), antigypsyism, and bullying. Additionally, there are sadly no references about incorporating **Roma history and culture** in the school curriculum, or about **providing language support** (only in the Memorandum). Another missed opportunity is not encouraging Member States to **employ Roma educational mediators and ensure diversity of staff** in schools and services, to better respond to the needs of all children.

The proposal for Recommendation equally **focuses on access to healthcare, including healthy nutrition, with a number of welcome actions**. In Recital 22, it acknowledges the social determinants of health, while Recital 23 equally highlights the importance of school meals in ensuring access to proper nutrition. Access to adequate healthcare includes **provision of affordable and quality medical services, medicines, and vaccination, as well as rehabilitation facilities** for children with disabilities. It is not very clear what the first measure entails and, while it does not specifically mention these aspects, we hope that it covers much-needed dimensions such as access to health insurance, developing the health infrastructure to cover remote communities, maternal health, curbing institutional discrimination, ensuring diversity in the medical staff, and hiring key workers such as Roma health mediators. With regards to access to food, we very much welcome calls to support **access to free, healthy, nutritious meals within school settings and outside of them**. However, the need for specific measures such as soup kitchens, social cafeterias, door to door delivery of hot meals etc is not spelled out, which would be key for Roma communities with reduced access to storage or cooking facilities.

Access to adequate housing is another key dimension of the proposal for a Recommendation on the Child Guarantee, which is very positive, as child homelessness and housing deprivation are consistently acknowledged. The Recommendation puts forward a set of measures with the potential to be very positive for Roma communities, such as providing homelessness centres and support, enacting social housing policies, supplying adequate housing benefits, tackling energy poverty, avoid institutionalization of children. Unfortunately, the **key aspects of forced evictions, segregated and ghettoized communities, legalising Roma settlements, or tackling environmental hazards are not part of the text**. There is only a vague reference in the section dedicated to enabling policy framework in the Explanatory Memorandum which speaks of “addressing the territorial dimension of social exclusion”, though this could strictly refer to imbalances between regions, or between rural and urban. Moreover, the implications of **lack of a legal address (as well as lack of identity documents, of a bank account etc)** are not taken on board in the proposal, despite significantly hindering access to rights, resources, and services.

ERGO Network response to the European Child Guarantee

ERGO Network is very pleased with the proposed implementation framework for the Council Recommendation on the Child Guarantee, firmly anchored in the **European Semester**, which will serve as monitoring mechanism, through the revised **Social Scoreboard** of the European Pillar of Social Rights (Recital 30). Member States have 6 months to present a **National Action Plan up to 2030** (Recital 11), which should detail target groups, quantitative and qualitative targets, measures planned (with the corresponding timelines and financial resources), enabling policy framework, national data collection, evaluation and monitoring. Each Member State also needs to **appoint a national Child Guarantee Coordinator**, to oversee the implementation. A mid-term evaluation will be carried out five years into the process. Some remaining questions regarding implementation concern to what extent will the Child Guarantee be included in the National Recovery and Resilience Plans, given the very short timeline, or how exactly will the revised Social Scoreboard trigger concrete policy change in the context of the Child Guarantee. Reporting for Member States is to happen biennially, which also raises concerns about alignment with other processes, such as the European Semester, which are yearly.

We further appreciate the **strong role given to the Social Protection Committee (SPC)** in the definition of qualitative and quantitative indicators and in establishing the joint monitoring framework (Recital 2). Another **very positive key dimension is the involvement of all stakeholders**, “including non-governmental organisations promoting children’s rights” (Recital 30). Furthermore, point (11) (e) encourages Member States to ensure participation of stakeholders such as children, civil society organisations, national Equality Bodies and others in the preparation, implementation, monitoring and evaluation of the National Action Plan. We hope that the **necessary support and outreach measures will be put in place for Roma children, Roma communities, and Roma NGOs to be able to engage** with these processes on equal footing.

ERGO Network and its members will continue to monitor the adoption process of the Council Recommendation on a Child Guarantee, as well as its implementation at national level, through the definition of national Action Plans in the next months. **We aim to ensure that Roma children’s voices are being heard**, and that appropriate links will be made, at EU and national level, between children’s rights and wellbeing and the objectives of the EU Roma Strategic Framework.