Minding the gap? Tackling the social consequences of the crisis
An assessment of the European Semesters 2011 to 2013
November 2013
PART I: European Overview of the European Semesters 2011-13

Introduction

Is European society minding the gap between rich and poor, between the high achievers and those who left school early, between the healthy and the sick, between those who are in work and those who are not? Do we care about the gap and are we doing something about it? In 2010 the EU and its Member States committed themselves to “smart, sustainable and inclusive growth” through the Europe 2020 Strategy. It introduced targets to reduce early school-leaving, to raise employment levels and to lift 20 million people out of poverty and social exclusion.

At that time, the financial crisis was about to turn into a crisis of unemployment (especially youth unemployment) and sovereign debt, leading to fiscal consolidation (‘austerity’). The crisis was about to hit public expenditure hard. As we head into the European Semester 2014 and as elections to the European Parliament move closer, bringing with them a new president and college of the European Commission, it is time to evaluate the European Semesters 2011-13 and the extent to which they have contributed to combating poverty and social exclusion in Europe, notably through social services.

In 2012-13, the AGS made tackling unemployment and the social impact of the crisis one of its five priorities. In 2012 and 2013, the Commission had advised Member States to give priority to “adequate and affordable social services to prevent marginalisation of vulnerable groups”. In 2012 and 2013, ESN set out to evaluate the extent to which Member States did give priority to social services. In 2013, in addition, ESN requested its members in ten countries to identify an ‘issue to watch’ in the context of the Semester in 2014-15. These are listed at the top of each Member State evaluation page.

ESN has reviewed the European Semester in ten European countries in 2011-13: Denmark, Finland, Belgium, Germany, France, UK, Italy, Spain, Slovakia and Romania.

About the European Semester

The European Semester is the name given to the policy coordination cycle of the Europe 2020 Strategy, which begins with the ‘Annual Growth Survey’ (AGS) in November. The Member States present their National Reform Programmes (NRPs) in April, which set out government policy in response to EU-wide and country-specific policy guidance. The Commission analyses these documents and issues Country-Specific Recommendations (CSRs) in June, which are subject to agreement by the Councils of Ministers and the European Council.
The European Semester 2014 and beyond

The ten countries in which ESN has monitored the European Semester during the period 2011-13 have given priority to “tackling unemployment and the social consequences of the crisis”. Overall, though, social services are not a priority and the range and importance of their role in society is not satisfactorily captured. Many of the Country-Specific Recommendations in 2013 are relevant to social services as well as employment, education and health services. ESN members have raised a number of issues per country, which they request the Commission to examine from the European Semester 2014 onwards.

There are a number of recurring themes in these evaluations from 2011 to 2013:

- Dominance of economic and financial issues at expense of social issues;
- Lack of balance between the priorities of tackling unemployment and tackling the broader social impact of the crisis which receives much less attention
- Narrow approach to social services as related solely to employment
- Invisibility of the most poor and excluded despite the Europe 2020 target
- Invisibility of disability or mental health issues in the NRPs despite their social costs and impact on labour market participation
- Lack of consultation on the NRPs at national level, even with regions and local government

There are positives in the evaluation too, notably about the potential of European policies to provide an incentive to undertake reforms which move towards social investment.

In the AGS 2014, this text is replaced by the following recommendation:

“Improving the performance of social protection systems, in particular by strengthening the link between social assistance and activation measures through access to more personalised services ("one-stop shop") and efforts to simplify and better target benefits with particular attention to the situation of the most vulnerable.”

There is a definite tendency in the AGS 2014 to reinforce the role of social protection and education systems in promoting labour market activation.
Part II: Member State Evaluations and Issues to Watch

ESN recommends to the Commission and to the respective Member State to watch the following issues closely in 2014-15, recalling the social and economic costs of these issues.

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Looking into the future, ESN predicts that its evaluation of the European Semester 2014 will be broadly similar in 2014 unless the role of social services is given a much higher priority in the next round of NRPs and NSRs.
Denmark

**Issue to watch 2014-15: impact on unemployment, poverty and social exclusion of the disability and sickness benefits reform**

**National Reform Programme 2013**

Social services are a minor theme which seems not to be prioritised, contrary to the Commission’s call in the AGS. There is a mention of improving treatment for drug abusers, but this part is rather poorly developed. There is a reform of disability benefits to introduce a “tougher case management”. In future, the work potential of a disabled person will have to very limited to be eligible for the benefit. The government wishes to offer a job scheme instead, whereby a person works for some hours and receives benefit supplements on top of wages. There is broadly the same approach in the area of sickness benefits – the new policy is that people should not live permanently on sickness benefits, but be supported to go back to work or receive a smaller cash benefit.

There is a strong view behind these reforms that cash benefits are seen as a disincentive to work – this may be true for some but ESN member, Steinar Eggen Kristensen, is not aware of research to back this up. Mr. Eggen Kristensen sees a potential problem with the government’s reform agenda: the benefit reforms may lead to a rise in poverty and social exclusion.

**National Reform Programme 2012**

Denmark is one of the most equal societies and social services are highly developed across the country. There is nothing new in the NRP: it consists of policies already announced or in the process of implementation. He saw three lines as being connected to social services: employment (labour market integration and supported jobs for people with a disability); youth education; social inclusion, but how social services are involved is unclear. One key measure has been to increase the basic benefit level. Various new social policy initiatives are yet to be defined by the new government. The association of social directors was consulted about the individual initiatives and polices, but not about the NRP as such.

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1 With thanks to Steinar Eggen Kristensen, Director of Social and Employment Services, City of Randers, Denmark and Member of the Association of Social Directors in Denmark. ESN did not evaluate Denmark in the European Semester 2011.
Finland

**Issue to watch 2014-15:** Cost inflation and efficiency of acute health care and all long-term care service services run by municipalities to contribute to sustainable financing of welfare system

**National Reform Programme 2013**

Finland is facing societal challenges of an ageing population and youth unemployment, which has increased dramatically. Municipalities are facing cuts to social and health services for older people. Most have raised local income tax from 19 to 20% as a result, but some did not realise just how much costs are going up and income is falling, so are facing a big local budget crisis. The productivity of public services is still a concern for the government as it was in 2012, and is recognised by the Commission. It was recognised that the NRP follows the European Semester process so it does not include other policies, such as the inclusion of persons with disabilities or those with alcohol problems. There is a big divide between the government’s political vision and the local reality; municipalities have to act now to ensure the long-term stability of their finances.

The biggest crisis risk to productivity in the inflation of health care costs (around 5-6% per annum, versus 0-1% for other services), which are almost impossible for municipalities to control. This is not being addressed properly by the government and the Commission should look into it. It is good to see a CSR on prevention, rehabilitation and independent living in long-term care. This is the sort of change that has been delivered in the municipality of Hameenlinna. Ireland is another country that has faced particular problems in containing health care spending – in this case, in the context of its Economic Adjustment Programme.

**National Reform Programme 2012**

There was a great deal of attention paid to industrial policy and competitiveness. The NRP describes the problems well but is short on solutions; for example, it makes a familiar call for higher productivity in the public sector, but does not offer any tools to realise this. The biggest social policy action in the NRP is for young people who are in long-term unemployment. There is also a new proposal on services for older people, but this is a sector that already has a good level of provision. Greater investment is really needed in early childhood education and care and excluded young people. However, long-term care for older people is politically more important. More generally in public policy, a focus on investment that brings an economic and a social return would be welcome.

Municipal social services have a major role in arranging and delivering services and in general, there is a lot of discussion about local government structure (size of municipalities, distribution of responsibilities between State and local level). It is good that the Commission is aware of this. Normally, the association of social directors comments on all social policy documents, but it was not aware of the National Reform Programme before ESN raised it.

> “Benefits have been increased (but not enough) in order to keep up with the EU poverty target, however the cash benefits approach is first aid, but no cure.”

*Jukka Lindberg*

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1 With thanks to Jukka Lindberg, Head of Purchasing, Department of Social Services, Municipality of Hameenlinna and Chair of the Association of Social Directors. ESN did not evaluate Finland in the 2011 Semester.

2 For more on the health care cost inflation and its relations with long-term care please see presentation of Jukka Lindberg: [http://www.esn-eu.org/userfiles/Documents/Projects_LPI/Meeting_4/Lindberg_Ham_FI.pdf](http://www.esn-eu.org/userfiles/Documents/Projects_LPI/Meeting_4/Lindberg_Ham_FI.pdf)

Belgium

**Issue to watch 2014-15: Efficiency of the long-term care system as a whole, rather than only institutional care (as indicated in CSRs 2013)**

**National Reform Programme 2013**

It is clear from the NRP that the govt is extremely worried about immediate consequences of the crisis and how to manage the associated economic and social risks. The NRP can be seen as a framework of what the federal government thinks is important for Belgium: it is the municipalities’ role to translate it into action.

One of the headings is combating unemployment, in line with the Commission’s AGS. There is good cooperation between employment and social services, though there are some problems because of different budgets. The NRP lacks recognition of the social consequences of family debt owing to housing and energy costs. Although poverty is visible, there is a cultural gap between the world of the policy-makers writing this report and the world of the poor and excluded people seen day to day by social services. There could also be a need to invest in information technology skills, as they are critical to getting a job.

The CSR to “continue to improve the cost-efficiency of public spending on long term institutional care” caused some concern. It only talks about institutional care, rather than prevention, rehabilitation and independent living (as in the case of the Finnish CSR, for example). ESN would argue (as the Commission has elsewhere) that cost-efficiency of health and long-term care is about the design of the whole system, not only about the performance of one ‘care setting’ within it.

Flanders is already making progress on moving from institutional psychiatric care, for example. In her local area, there are no longer waiting lists for residential care because of investment in home-care. Still, there are too many people in institutions and hospitals so we have to look for more efficiency by deinstitutionalisation and prevention, whilst ensuring that the most vulnerable still get the care and support they need.

“We have to raise the profile of social services, not turn them into employment services, but help people to participate in the community as well as work.”

*Karine Lycops*

**National Reform Programme 2012**

The NRP is theoretical and presents a challenge to local policy-makers and practitioners for putting it into action. There is a big priority for tackling child poverty but a specific budget is not mentioned. There is no mention of extreme poverty in the document; it does not address people who cannot work for reasons other than disability or ill health, but instead have complex social and family problems (mental health problems, drug & alcohol, insecure housing etc.). Rising energy prices severely affect households with a low income. The NRP is weak on measuring the long-term effects of its proposals (at a level below the macro level of the Europe 2020 indicators).

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Germany

Issue to watch 2014-15: Institutionalisation, poverty and labour market exclusion of persons with disabilities and mental illness and integration of migrants into employment

National Reform Programme 2013
Unemployment is falling in Germany, so there are higher contributions to health, social and care insurance. The priorities for 2013 remain the same as for 2012:

- Better education for children (in August 2013 childcare was extended to age 2)
- More persons with a university degree
- Reduce rate of poverty and long-term unemployment

Germany has to tackle poverty and unemployment at local level through its network of 400 Job Centres. Policies for older people with care needs and people with disabilities had not been reported in 2012; in 2013, there was a small improvement.

The excessive reliance on institutional care, notably for people with a mental illness, should be an area of concern. There are high costs and this policy embeds the acceptance that these people are excluded from the labour market. Although Germany is in rather a good situation this year, it may different in a few years’ time because a crisis for southern Europe could become a crisis for Germany.

National Reform Programme 2012

The NRP had not been mentioned at meetings of the social directors of the 16 largest German cities and the medium-size cities. The NRP reports that Germany is making a big investment in the long-term unemployed and in children and young people. Cities are also introducing new universal benefits and services to families based on a central government programme and financing. There is no visible mention of older people or people with disabilities, though this may be a reporting gap rather than a policy gap. The government needs to reflect on how to meet the needs of the elderly and disabled. Overall, it is regrettable that the NRP only spanned one year at a time and was thus rather short-term in focus, despite appearing to be a highly strategic document.

National Reform Programme 2011

The main focus of the German NRP is labour market and employment policies; however there are few explicitly new policies outlined in the programme. A lot of emphasis was placed on bringing women back into the labour market. He argued that there is a need to focus more on education, as improving access to and the quality of education could prevent many issues that later emerge in the labour market. The Commission shares this view: “the unemployment rate is especially high for low-skilled workers, while their participation rate in life-long learning (LLL) remains low.” The role of local government is implied rather than made explicit due to the decentralised German federal system.

The Commission sees long-term and high unemployment among low-skilled workers, particularly with a migrant background, as a remaining challenge for Germany. However, it was concerned that the NRP did not identify people in ‘in-work poverty’ as a challenge, despite the growing number of people in this category. The NRP briefly lists some education initiatives from the Länder. It judges that further measures are necessary to tackle low educational attainment and high drop-out risks of certain social groups.

With thanks to Guido Kläser, Director of Social Services, Health and Housing, Municipality of Erfurt and Member of the Working Group of Social Directors of the 16 Largest German Cities (2013 and 2012 evaluations). Thanks also to Matthias Schulze-Böing, Director of Offenbach City JobCenter and Chair of the association for local employment policy (2011 evaluation)
United Kingdom

Issue to watch 2014-15: Government inaction on sustainable financing for long-term care (‘adult social care’) by local authorities

National Reform Programme 2013
Although the NRP presents a positive picture with good economic indicators, it does not mention social care services, so it was a disappointing read from that perspective. The housing benefits reform is described and it will have a big impact on local authorities as providers of social housing and housing benefits. It is difficult to foresee the impact, but there is an urgent housing crisis already in London. It is apparent from the NRP that Scotland and Wales conducted consultations on their parts, but England did not. The 2013 CSRs are justified and there could be some indirect implications for social services.

There are some potential areas for a CSR relating to social services: one would focus on social and health care for the oldest old – the over-85s: how to ensure adequate and sustainable financing to allow local authorities to meet their needs? This is an issue on which successive governments have failed to act. Another area to consider in line with the Recommendation on ‘Investing in Children’ could be vulnerable children who have been taken into care or are at risk.

National Reform Programme 2012
The content of the NRP is familiar but not the NRP as a document in its own right. The association of Directors of Adult Social Services was not consulted. Because of various ongoing policy debates in the UK, it would have been good to understand more of the government’s intentions on welfare and social care reform and funding, but there was a disappointing lack of depth. There was only one reference to ‘adult social care’ throughout the NRP. There is some attention paid to family carers, but the logic (possibly economically flawed given costs of care) seems to be to get them into work. The government is still not addressing long-term care funding properly, not only in this document, but in general.

There is a particular government initiative on ‘troubled families’, for which some local authorities have received small amounts of money; however the funding tends to be tied to particular central government priorities that do not necessarily reflect local needs. Thanks to ‘austerity’, the need to ‘show you’re doing something now’ through small one-off projects in some cases overrides the long-term systemic reforms, which would have a greater impact over time.

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7 With thanks to John Powell, Director of Adult Social Services and Housing, London Borough of Redbridge and Member of the Association of Directors of Adult Social Services. ESN did not evaluate the UK in the 2011 Semester.
France

Issue to watch 2014-15: Making sure that future NRPs reflect the full range of government policy on tackling poverty and social exclusion for vulnerable groups

National Reform Programme 2013
In December 2012, a major plan on poverty and inclusion was adopted by the government following consultation with the national council on poverty and inclusion – which before then, had not met for six years. In that plan, there were three points: integrated approach; reduce inequalities of social rights; inclusion and employment. The red thread in the plan was to join up policies so that all public services and partners are working together – this strategy had achieved wide-spread support.

It was therefore very disappointing to find this work was not reflected at all in the NRP, which has little to say on access to social rights, vulnerable people, migration, disability or long-term care. The NRP responds to the Commission’s concerns about France’s excessive deficit with a very economic approach. There are a lot of proposals about re-organising sub-national government and reducing health care costs, but little about the involvement of vulnerable groups in social policy or childcare. The NRP notes the European targets on early school-leaving and the employment rate, but it is not clear what action will be taken. The NRP does not reflect the full range of government policy – a similar remark to the Finnish evaluation.

“Social protection (even excluding pensions) represents a large share of public spending, so deserves more attention in a major statement of government policy such as the NRP.”

Marie-Paule Martin-Blachais

National Reform Programme 2012
In general, the NRP is very focused on employment and the economy; poverty & social exclusion appear quite late, suggesting a low priority. It is a report on existing policies and what has already been done; it is heavily focused on the job-seekers activation benefit (RSA). Child protection is invisible though there are some minor mentions of early childhood education and care. From the NRP, one could understand that social services’ role is to help get people into work, though there is of course much more to it than that. Even so, there is more about tax/benefit measures to incentivise work than there is about help and support through services. France tends to emphasise citizens’ rights strongly but is less good at making those rights known and ensuring take-up of rights and benefits. The National Agency for Child Protection was not aware of the NRP or the NSR.

8 With thanks to Marie-Paule Martin-Blachais, Managing Director of the National Observatory of Child Protection. ESN did not evaluate France in the 2011 Semester.
Italy

**Issue to watch 2014-15:** Lack of national framework for social services; regional divide in development and consequent impact on poverty, social exclusion and unemployment in South

**National Reform Programme 2013**

This NRP was submitted by the technocratic government of Mario Monti, so there is a question of its validity, now that there is a new government led by Enrico Letta. According to the NRP, Italy has to reduce public spending, but it is not clear whether the regions and provinces support this. Overall, the NRP reports on health and employment, but social services are not there. The health section emphasises community health care, but there is no parallel statement on community social services. Even if this principle had been mentioned, municipalities do not have the resources to implement it.

The Italian government’s vision was for social services is not clear from the NRP or even in general. Most Italians understand social services as an expression of charity or solidarity, but there is a need for a national approach because of huge regional differences: the North is in quite a good situation in terms of social and health care, but the Centre and the South are not. There is no single law which states what services citizens can expect from municipalities.

**Graph 10:** expenditure per capita on social services in different Italian regions; North Italy to the left, South to the right.

**National Reform Programme 2012**

Italy has produced similar strategic documents to the NRP in the past (not necessarily those within the EU process) but there has always been a large implementation gap. The NRP is a work in progress but there is little real political direction behind it and it is difficult to see what results it can produce. A 2002 law gave municipalities responsibility for social services delivery, yet Italy still has huge regional variations: in Trentino-Alto Adige, they spend €800 per inhabitant on social services, whilst in Puglia it is €200. The government is keen to decrease regional differences, which will mean reducing services in some areas and increasing them in others. The government will have to overcome major opposition from interest groups, change the structure of institutions and build stronger alliances with people and communities to help improve social security for all Italians.

As far as the NRP’s social policy priorities are concerned, these are family, work, the simplification of administration and tackling corruption. The spending priority is older people (who use up to 80% of social spending through pensions, health and long-term care). However, municipalities lack money for family policies, especially early childhood education and care. It seems doubtful that the Europe 2020 targets will be met.

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9 With thanks to Bruno Marcato, Director of Social Services Agency, Municipality of Bolzano. ESN did not evaluate Italy in the 2011 Semester.

10 Source: presentation to working group meeting 4 by Bruno Marcato: [http://www.esn-eu.org/userfiles/Documents/Projects_LPI/Meeting_4/Marcato_Bolzano_IT.pdf](http://www.esn-eu.org/userfiles/Documents/Projects_LPI/Meeting_4/Marcato_Bolzano_IT.pdf)
Spain

Issue to watch: Impact of local government reform of community social services on poverty and social exclusion

National Reform Programme 2013
There is more mention of social services in 2013 than in 2011 or 2012, but still a stronger weighting towards unemployment than the social consequences of the crisis. The lack of cooperation between health, education and social services is a major challenge which is not addressed. In addition there are two misleading statements with regard to the "rationalizing and modernizing" of the long-term care. The first one refers to the so-called delay in the introduction of the care allowance for people with lower care needs who would be suitable for prevention/pro-active social work schemes. That allowances are not in fact delayed: they are rather withdrawn from the implementation schedule. The second one points out that "the system of registering non-professional carers in the Social Security system was reorganised". It should rather say that it was eliminated. Those measures would not be in line with the Social Investment Package’s call for a focus on prevention.

The most controversial government policy – that is, the reform of the local administration – is not properly reported in the NRP, in relation to its effects in the Social Services Systems, which are an exclusive competence of the Autonomous Communities. The reform intends to remove responsibility – and thus, future funding- on community social services from the municipalities smaller than 20,000 inhabitants. This is opposed by all the whole local and regional government sector on the basis that knowledge of local needs is vital in social work. This Central State move collides with the already developed locally-centred Community Services Systems, which play a major role in prevention. This to contradict a basic principle of prevention, essential to the Social Investment Package. ESN has passed on an evaluation of the reform by the Spanish National Association of Directors of Social Services12 to the European Commission.

The CSRs are reasonable, but only if their interpretation is according to the Social Investment Package. In fact, the SIP has already helped the Autonomous Region of Galicia to win a European Social Fund grant for Roma and migrant integration, following public sector cuts. Both the NRP and the National Roma Strategy should be done in consultation with the regional and local authorities.

“Professionals accept that we have to reduce public expenditure, but it would be a mistake to do so without rethinking public services.”
Carlos Santos Guerrero

National Reform Programme 2011
The NRP is very much employment-focused; education and social services are only important in the context of helping improve the national employment rate. There are very few references to the role of social services in ensuring better levels of social inclusion. The long-term economic costs of social exclusion and poverty in terms of welfare and health expenditure were not a strategic concern. The NRP is also missing a comprehensive approach to combat the prejudice surrounding poverty. More emphasis should be placed on tackling child poverty, a point also made by the Commission: “The lack of affordable care services is a significant factor causing inactivity or involuntary part-time work, and thereby influencing child poverty.”13

11 With thanks to Carlos Santos Guerrero, Head of Service for Cooperation with Municipalities, Department of Welfare, Autonomous Region of Galicia. ESN did not evaluate Spain in the 2012 Semester.
12 “El valor de la proximidad” (“the value of proximity”): http://www.directoressociales.com/images/reforma%20ley%20bases%201marzo%202013.pdf
13 Council Recommendation (June 2011), the National Reform Programme 2011 of Spain, SEC(2011) 718 final
Slovakia

Issue to watch 2014-15: instability of legal and financing framework and for social services, including deinstitutionalisation strategy and long-term care

National Reform Programme 2013
Slovakia’s welfare system has been built up over the last twenty years, but since the crisis there are not adequate resources to meet all the social needs. The section on tackling unemployment and social consequences of the crisis is four pages altogether, and only ten lines for social services. The policy for tackling unemployment is not presented in detail: it talks about active labour market policy, targeting young people and the long-term unemployed, but there is no detail.

On social inclusion, the main principle is that citizens should be less dependent on the welfare system. By way of background, there is a very strong benefits system in Slovakia, with many different overlapping benefits. The government has announced its intention to cut the amount of certain benefits, then it introduces other new benefits, adding to the complexity and inefficiency of the welfare system. On social services, a new law on social work, national care quality standards and deinstitutionalisation are mentioned. There is also a call to providers to diversify their sources of income.

The CSRs 2013 focus on personalisation in public employment services, introducing a youth guarantee and expanding childcare. The social services sector in Slovakia would really appreciate a stable and coherent legal framework, within which they could plan and develop social services to meet the needs of the population and make progress. This would also allow them to make progress on issues on which the government is backtracking such as the transition from institutional to community care as well as areas raised by the Commission in the CSRs.

14 With thanks to Michaela Sopová, Head of Social Affairs, Bratislava Self-Governing Region. ESN evaluated the Semester in Slovakia for the first time in 2013.
Romania

**Issue to watch 2014-15: Capacity of local administration for implementation of legislation and development of adequate social services**

*National Reform Programme 2012*
There is a big focus on legislative changes, e.g. the law on social assistance but there has not been much follow-up through subsidiary legislation or methodological guidance. It is weak (as is much legislation) on clear guidance on implementation for municipalities. A lot of attention is paid to community-based social services for children and families; there had been special measures for deinstitutionalisation until 2007 ahead of EU membership but this slowed especially in relation to people with disabilities.

The NRP cites various EU-funded projects but these are not necessarily representative of the whole country or municipalities’ efforts outside of EU funding. There are big gaps in rural areas and very low capacity to implement legislation in smaller municipalities. There is nothing on the situation of older people living in poverty or long-term care. The National Roma Strategy had sought to place greater responsibilities on municipalities, but with only a derisory national budget attached, accompanied by an invitation to apply for EU funding.

*National Reform Programme 2011*
The NRP was quite ambitious in its objectives. As a result that there has been a lot of references to ‘reform’ with regards to access to health care for vulnerable groups as well as access to the labour market. She also underlined that reducing the rate of early-school leaving and integrating the Roma community were also key aims present in the NRP. According to EC recommendations, unemployment remains particularly high among vulnerable groups, especially the Roma population.

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15 With thanks to Monica Ghitiu, Head of Child Protection, City of Cluj (2012 evaluation) and Alina Mrejeru (2011 evaluation). ESN did not evaluate Romania in the 2013 Semester.
16 Council recommendations (June 2011) on the National Reform Programme 2011 of Romania, SEC(2011) 731 final