

**An Interim Assessment of NSRs 2008-2010: Process and
Quality of Policy Design**

**SUMMARY REPORT
of Caritas Europa**

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1 Introduction

Caritas Europa is one of the largest civil society networks in Europe, with members in every country in Europe. The action of its member organisations ranges from running grassroots community projects through major migration health services to hospitals and involving in national advocacy. The extensive and wide ranging practical engagement with the poor and marginalised in European societies informs Caritas advocacy work at the national and the European level.

The present study was undertaken parting the framework of Caritas Europa's involvement – through its INCLUSION strategy and work plan – in the EU Progress programme as a part of its long standing commitment to engaging in the NSR process. It reports an interim assessment by Caritas Europa of the quality of the NSR 2008-10 design process and policy proposals.

The report is intended to feed into the European Commission report on the 2008 NSR spsi round, but it also will form the basis for ongoing interaction, analysis and work on the part of Caritas Member organisations.

2 Methodology

In order to capture of the rich insight of the Caritas network, we have used a case study approach. This enables us to reflect the variations in social policy processes, the impact of various kinds of state structures and thus the contexts that Caritas' members experience across Europe.

We have collected qualitative data by asking the INCLUSION participants representing Caritas Member Organisations in the current and candidate Member States to provide assessment of their national situation. They have been presented with two consecutive questionnaires containing open ended questions and one extra question asking to score civil society participation on a 10-point scale.

From the outset we focused this interim study on two key aspects:

- civil society involvement in the process of the design of the NSRs and
- the quality/ content of the final document represented especially by the inclusion of civil society recommendations.

Our first questionnaire, sent out in June 2008, focused on civil society involvement in the NSR 2008-2010 design process. To aid the interpretative process, the participants were asked to elaborate on their responses as well as to provide some preliminary views on the NSR content during a working group session held in Leuven in July 2008 at the occasion of the Caritas Europa Summer University. This was not an easy task, however, as in most of the participating states the NSR draft has not been made available to the civil society and other parties involved in the process by that stage. Similarly, due to the later than expected NSR publication in most of the Member States, the majority of the INCLUSION participants were only able to complete the second questionnaire, focusing on the NSR content and quality,

after mid- or very late October 2008, when many of them saw the document for the first time.

Using the combined feedbacks that we have gained we have added to our analysis of various aspects of the NSR process and content a few specific country-based examples of the good and not so good practice. These are presented in the appendices of the report.

3 Civil Society Involvement in the Social policy process

To assess the quality of civil society participation in the NSR design and, not least, to evaluate any progress compared to the previous round of NSRs, we asked INCLUSION participants a number of questions focusing on three key aspects: the extent of civil society involvement, process efficiency and the extent of actual impact of NGOs on the NSR.

In quantitative terms, INCLUSION participants' assessment of civil society involvement on 1-10 scale is presented in Table 1. We will now comment on these scores as well as discuss key qualitative findings based on responses to open ended questions.

3.1 The extent of civil society involvement: breadth of representation

We asked national Caritas' representatives to assess participation of four groups of actors: the voluntary sector in general, national Caritas Member Organisations, regional/local governments and people with direct experience of poverty.

3.1.1 The Voluntary Sector

Voluntary Sector representation varied from rather good (in Belgium, the UK, Germany, Malta, Austria, Greece) to rather poor (Slovenia, Slovakia, Romania, Croatia and even Ireland). In the latter case:

'The government decided that there had been sufficient consultation in the preceding years on the previous NSR/spsi and on the National Social Partnership Agreement and decided not to hold a formal consultation this time but to use the material already available from previous consultations.' (CORI Justice, Ireland)

In some countries, it is becoming an established practice to invite the umbrella organisations rather than individual NGOs. For example, in the case of Austria it was "Armutskonferenz" (Social network against poverty and social exclusion) and BAG - Bundesarbeitsgemeinschaft Freie Wohlfahrt (the network of five big NGOs and social service providers: Red Cross, Diakonia, Caritas, Hilfswerk and Volkshilfe), five representatives of the networks financed by the PROGRESS programme, the coordinating centre of the Self-help

groups, and the alliance of denominational hospitals. The Austrian government has also invited a number of associations, chambers of commerce and trade unions. One danger noted by our Austrian Member Organisation is that 'umbrella statements' for the NSR are sometimes rather vague.

In the UK, SPTF (Social Policy Task Force), a group of networks and organisations concerned about poverty and disadvantage and launched by the European Anti-Poverty network in the UK, was one of the main contributors to the process.

In Portugal, the voluntary sector was represented via a Forum of NGOs for Social Inclusion which united 52 organisations; and also via EAPN Portugal. The forum has produced a recommendation document regarding the new NSRpsi process. However, as of July 2008 no consultation process on the NSR had begun - the document was being developed by the National Coordinator technical team, and the civil society was able to provide input only after its approval by the government and the parliament, which makes it difficult for NGOs to influence PPOs or suggest major changes.

The INCLUSION partner from Malta was especially positive about civil society involvement in the NSR process:

'The representation of the 3rd Sector in the NSR design was very good. The Ministry in charge has organised nine Focus Groups in which the voluntary and Church NGOs including Caritas and some community groups took an active part. The groups, focusing on Disability, Mental Health, Irregular Migrants, Children and Youth, Addictions, Elderly, Domestic Violence, Gozo, Parish Priests & Local Councils, were facilitated and moderated by representatives of the NGO sector. Each group took part in two separate meetings, one for the service users and the other for the service providers.' (Caritas Malta)

Umbrella organisations and networks also took part in the process in Belgium, although their 'selection process was rather ad hoc and unclear' (Caritas Belgium). In Greece and Slovakia, EAPN was the key contributor along with Caritas, although in Slovakia the Caritas Member Organisation was not officially involved in the process.

The governments of the 'younger' EU Member States have demonstrated different degrees of interest in involving their NGO sector in the process. While such NGO involvement was practically non-existent in Slovakia and Romania, the Estonian and Lithuanian governments made an attempt to involve NGOs and, in case of Lithuania, the public. In Estonia, the Ministry of Social Affairs has held a seminar on the priorities of social inclusion and has spread information on it via a major NGO mailing list and other channels. In Lithuania, NGOs could take part in the NSR design process via a monitoring group made of around 30 organisations, however, it was dominated by ministry representatives. In addition, the public was invited to comment on PPO's via a special website, although the extent of public awareness about it is unclear.

As in the previous round, one problem articulated by different Member Organisations is that civil society involvement is limited to a formal process. For example in Luxembourg, 'the NGOs are always present but the trade unions feel they are wasting their time with the process. Local Authority organisations are involved but feel that central government gets all the credit.'

3.1.2 Caritas Member Organisations

The extent of Caritas Member Organisations' involvement in many countries reflected the overall participation of the voluntary sector although in some cases Caritas happened to be the key critic of the design process, attempting to improve its quality. Caritas Member Organisations also do play a mobilising role in some member states: for example Caritas Austria is trying to make alliances between NGOs that do advocacy and those that deliver services.

Table 1. Assessment of the NSR Process by Country (Where: 1 – very low/poor, 10 – very high/ excellent, 0 – N/A or ‘unable to assess’)

	IE	DE	UK	SL	LT	EE	BE	AT	MT	SK	EL	PT	RO	CZ	Average score
The extent of 3rd sector involvement in the NSR design process	1	7	8	3	5	4	8	6	7	1	6	3	1	5	4.6
Caritas’s involvement in the process	3	8	4	5	8	4	7	7	6	5	4	4	1	5	5.1
The extent to which Caritas/ civil society could influence the key social policy areas	2	3	3	3	6		4	8	5	3	5	4	1		3.9
The working group meetings:															
Frequency	1	2	8	0	5	4	3	4	6	0	0	0	0	5	2.7
Length	1	2	8	0	5	6	8	5	7	0	0	0	0	5	3.4
Quality	0	1	8	0	5	9	7	6	7	0	0	0	0		3.3
Use of ICT (e-mail, website, etc.)	2	7	7	4	7		6	8	4	3	0	0	1	9	4.5
Time to develop suggestions and provide feedback	2	5	7	4	5	0	7	4	4	3	0	0	0	3	3.1
Relationship with the civil servant in charge of the NSR	6	7	5	7	8	5	8	9	6	1	8	9	0	5	6.0
Relationship with the country’s independent expert	9	7	0	1	0		0	0	3	1	0	0	0		1.8
The extent of improvement in civil society involvement	1	2	5	4	8	0	4	8	5	1	0	5	1		3.4

In Germany and Austria, Caritas Member Organisations have made significant written contributions to the NSR development:

'At the kick off meeting we were invited to make a list of priority issues for the NSR, which we did before the 17th December. We also wrote a 12 page long statement on the NSR draft with very detailed proposals and recommendations as well as three best practices. It seems that two of them will be accepted in the Austrian NSR.' (Caritas Austria)

Likewise, although no formal involvement took place in Ireland, CORI Justice – the Caritas Europa INCLUSION partner – is a recognised Social Partner in the country's Social Partnership process and through this process, CORI Justice made their voice heard and positions well known in all relevant arenas. As a result some of these positions have been taken up by the government.

Caritas Malta moderated one of the focus groups and took an active part in the EAPN study which analysed a number of target groups: widows and widowers, ex-convicts, homeless people, single mothers, and third country nationals. The results of this study were presented at a seminar in order to influence the upcoming NAP Inclusion.

In Portugal, Caritas is not currently a member of the NGO Forum. Caritas tried to book a separate meeting with the National Coordinator of the NSR process to express their main concerns and suggestions before the official consultation process began, i.e. the stage when any serious impact can be made. At the same time, Caritas was raising awareness about the INCLUSION programme through the Diocesan Caritas organisations.

Sometimes, however, despite being actively involved in the process, Member Organisations had difficulties to *'put forward specific "Caritas" issues, since they are not self-evident given the priority policy objectives chosen'* (Caritas Belgium).

Likewise, in Greece Caritas felt that due to their specific programmatic competence they could contribute to only one of the PPOs focusing on refugees and migrants.

Furthermore, despite this being the second round of NSRs where Caritas took part via an EU-funded project, Member Organisations in Slovenia and Romania still had to try to *'fight'* their way into the process:

'Caritas Romania was searching who is responsible for what, to find the departments and the persons in charge. It was impossible to find even the draft version of the NSRpsi. When Caritas Europa sent the link on EC we had the opportunity to read it.' (Caritas Romania)

'In personal contact with responsible person from Ministry we asked for more "real" involvement of civil society sector and we have offered our participation but this time representative of Caritas was not a member of preparatory group.' (Caritas Slovenia)

More positively, Slovenian Caritas has involved Caritas Croatia, a Member Organisation with less experience in EU related advocacy, *'to visit "Mr. NSR" who explained to us the whole process and at the same time he informed us about priority objectives'*.

Building on its competence and confidence, developed specifically as a result of their involvement in Caritas Europa projects, Caritas Croatia has made some proactive steps to ensure its future involvement in JIM implementation.

'Caritas Croatia has participated in 2 out of 4 conferences, presenting its own input. The aim of the conferences was to discuss cooperation and exchange opinions between representatives of the European Commission, government bodies, civil society, social partners and local government in the field of social security and social inclusion in relation to implementation of the JIM. Caritas Croatia has forwarded a request to the Ministry of Health and Social Welfare to be included on the official list of representatives of the civil sector. It has requested a meeting with the Ministry's Secretary – Co-ordinator of the JIM implementation process as well as the future work of the Commission and working groups. The Secretary invited Caritas to continue cooperation in all future events that the Ministry will organise concerning the implementation of JIM.' (Caritas Croatia)

In the UK, Caritas came late to the process of the NSR. Nevertheless civil servants in the Department of Work and Pensions have now enabled the Caritas representative to contribute to three meetings and make a contribution to the UK NAP consultation.

3.1.3 People with Direct Experience of Poverty

It appears that in most surveyed Member States people experiencing poverty were either involved via the national EAPN organisation, or through other organisations representing these target groups (Belgium, Malta, Germany), or they were not involved at all.

A few exceptions are Austria, Luxembourg and the UK, where people experiencing poverty were involved in the process directly.

In March 2008, Caritas Luxembourg has arranged a meeting for people living in poverty. Over 100 people attended and participated in working groups. The minister of Social Housing attended too. These people were also involved in doing a study of the housing rental market to demonstrate the shortage of affordable housing.

In Austria, upon the initiative of the Austrian Social Network Against Poverty and Social Exclusion (Armutskonferenz) a conference with people directly experiencing poverty was organised, and the Ministry supported it.

In the UK, the SPTF (Social Policy Task Force) together with the Department for Work and Pensions had undertaken the "Get Heard" project which helped hundreds of people with experience of poverty and social exclusion to hold discussions about government policy, and have their voices heard by the UK Government. These views were collected by the project and put together in a report for the 2006 National Action Plan on Social Inclusion. In 2007 they also worked together to hold the first UK People experiencing Poverty conference in July 2007. This was modelled on the European People Experiencing Poverty conference held annually under the Presidency of the EU. They also undertook the "Bridging the Policy Gap" project 2007-8. This entailed holding pilot peer reviews in 3 local authority areas on 3 NAP related objectives. This together with the Poverty Conference in 2007 fed into the preparation of the NAP 2008-11.

In France, the government held meetings all over the country with groups of people experiencing poverty, including homeless and migrants. One downside was that mostly well educated migrants took part in the process while more vulnerable groups like Roma were neglected.

3.1.4 Regional and Local Governments

Likewise, the INCLUSION participants noted *insufficient* involvement of regional and local governments, with only Austria, Belgium, Estonia, Luxembourg, Slovakia and Greece being an exception.

In Slovenia, the Caritas Member Organisation drew government's attention to this shortcoming, although no changes have taken place:

'I have objected that almost nobody from local community was present. I don't know if the state asked them to contribute. I have the impression that only ministries contributed and some associations - Social Chamber, Trade Unions, Public Institutes...' (Caritas Slovenia)

3.2. Process Efficiency

3.2.1 Face-to-face Meetings: Frequency and Impact

According to our INCLUSION experts, working group meetings were used rather effectively in the UK, Estonia, Belgium, Austria and Malta (meeting quality was rated above 5). It should be noted however that even in these Member States, except Malta and UK, Caritas experts felt that the frequency of the meetings was unsatisfactory (Table 1).

'The process seemed to work quite well at the start: open access and timely consultation through two working groups called "actions" and "indicators". However, several meetings, including critical ones, were cancelled at the last minute. This is particularly so for the meeting scheduled in the beginning of July, where we should have had a view on a more elaborated draft. A new meeting has been scheduled for the end of August, which will leave virtually no time to influence things.' (Caritas Belgium)

Also, meetings somewhat ***lacked deeper discussion*** and dialogue, the issue addressed proactively by Caritas and NGOs in Austria:

'There were two meetings, a third one will take place next week with the European Commission. Since a lot of people attended those meetings, there was no time and opportunity for a mutual dialogue or a deeper discussion. It was more or less an exchange of positions. Caritas and the NGOs regretted this fact and suggested to establish working groups on selected main issues in the next NSR process. It seems that the ministry plans to take up this idea. On the other hand the Minister himself

attended the meetings, which gave the NGOs a possibility to address him directly.'
(Caritas Austria)

The problem of **insufficient dialogue** was re-iterated by a number of Member Organisations:

'Usually monitoring group meetings had very clearly stated terms and timetable. It was an opportunity to express opinion, but for having a dialogue time was not sufficient.' (Caritas Lithuania)

'Seminars and workshops were used. There was one NRS-specific meeting (June 19th), lasting 4 hours and thus leaving a slightly rushing impression. There was opportunity for mutual dialogue for those who had previous fixed positions, but there was not much time to generate ideas and questions on the spot.' (Caritas Estonia)

Some Member Organisations also expressed **doubt whether the seemingly very effective meetings will result in visible impact on the policy**:

'... this working method [focus groups] was a fruitful one and was very enriching for the government. On the other hand, we hope that this positive exercise will actually be analysed thoroughly and will become the basis for policy making. Let's hope this is not just a superficial exercise used for the sake of providing a consultation platform.'
(Caritas Malta)

This concern proved to be a reality in the UK:

'The DWP held consultation meetings and invited voluntary organisations but experience within at least one workshop suggests that recommendations may have been worked out by civil servants in advance of the meeting and they are the ones which are likely to appear in the final document rather than suggestions that are made outside of the SPTF framework. [...] The launch of the NAP was used as an opportunity for Anne Maguire MP, a minister in the DWP, to address issues in the green paper on social welfare reform. At the launch of the green paper itself, relatively small disability rights groups had expressed major concerns about its contents; at the launch of the NAP the voluntary organisations involved in the SPTF did not raise the same level of concern. One is left asking whether or not, by taking part in the NAP process, the critical voice of the voluntary organisations have been blunted. Interestingly, a senior civil servant responsible for the NAP transferred over to the consultation on the social welfare green paper.' (Caritas Social Action, UK)

In the case of Greece, inter-government workshops and meetings and two meetings with the union representatives took place. However Caritas Greece has not been invited to attend any of them. In this country, the government decided to involve civil society by inviting to provide input and feedback via a questionnaire.

Again, governments of some more recent EU Member States - Slovakia, Romania, Slovenia – held none or very few meetings, although in the case of Slovenia it may have been caused by the new elections:

'An introductory seminar was the only method used as an opportunity for exchange. Other meetings (except preparatory work group and inter-ministerial coordination)

as far as I know were not held. Process was in my view strongly under the influence of elections held in September.' (Caritas Slovenia)

'The only working groups consisted of governmental institutions. NGOs were not involved in debates, seminars or others actions. Civil society organisations did not have space for suggestions. They could only send comments as general public.' (Caritas Slovakia)

'In our case the Ministry of Labour had consultations only with the local offices for labour from the counties. The methodology used was questionnaire. A second method was to work with Health Ministry and with Education Ministry to get their feedback on the strategy. No data are available on the number, length or frequency of the meetings.' (Caritas Romania)

In looking at the Romanian case we also have to look at the historical habits of civil society engagement. Caritas Romania's engagement is pioneering and there are lessons to be learnt on all sides.

3.2.2 Use of ICT

It was common to supplement communication in-between working group meetings by using email and/or website and telephone in many countries. Overall, this proved to be an **effective complementary method where face-to-face process was already in place to engage in 'live' discussion.**

'Most of the communication was done by e-mail. And then there were a few telephone calls, especially concerning some detailed information and good practices. That was very useful and worked without any problems.' (Caritas Austria)

'An information package was sent via e-mail (description of workshops/ PPO's) the previous evening and distributed at the seminar. Communication so far is welcome, but only when there are already very clear positions concerning the NRS.' (Caritas Estonia)

Where meetings were not widely used, email communication often proved less effective and even quite discouraging:

'The government sent us the table of content of the report in February and the first draft in June via e-mail. The second time they asked us to write our suggestions and comments directly into the text. This method is quit complex but we did it. It has the disadvantage that we cannot really publish these suggestions. Therefore we wrote a very short summary of our comments.' (Caritas Germany)

3.2.3 Time Allocation and Feedback

As in the previous round, insufficient and inconvenient timing allocated to civil society to provide their contribution proved to be quite a common issue.

'The draft document was circulated to Social Partners during their holiday period. This was the wrong time to seek comments. No other opportunity was provided.' (CORI Justice, Ireland)

'Usually time for reaction was very limited. In this situation knowledge and skills gained through Caritas Europa activities like CONCEPT or Summer University 2008 were very helpful.' (Caritas Lithuania)

At first glance Germany could be regarded as a good practice example in terms of involving its voluntary sector in the NSR process: the Ministry of Social Affairs has sent invitations to about 50 NGOs asking to submit contributions. However, both the initial contributions in February and comments on the NSR draft in June could only be submitted in writing, with little opportunity for productive face-to-face discussion due to the poor timing:

'There has been only one meeting where the draft of the report has been discussed with NGOs and academics. That meeting took place one day after the draft has been sent to the NGOs. Therefore nearly nobody had read the whole draft. In addition the meeting took place directly after the discussion of the 3rd national report on poverty and wealth which is always a big issue in Germany. Therefore the discussion on the draft of the NSR has not been very productive.' (Caritas Germany)

Furthermore, in some Member States civil society actors were not able to comment at all as the draft **document was simply not available for comment or input**, even as late as September 2008:

'The draft version is still not released for public consultation. According to a governmental official, currently the draft NSR is undergoing revision in the cabinet of Ministers and will be released for public consultation within the upcoming couple of weeks. Following this, it will be released for consultation with Parliamentary Committee for Social Affairs and with the general public.' (Caritas Malta)

'We did not see the draft so far but we had a meeting with the National Coordinator of the NSR on the 29th of September and she informed us about the key topics and the structure of the document.' (Caritas Portugal)

Another issue of concern was **lack of feedback from the government on contributions made by the NGOs**.

'For the first time it was possible for the NGOs to make proposals for the PPOs. Two times we were asked to comment the draft report – due to the fact, that in the first draft, a lot of chapters were still missing. Discouraging is the fact, that one never – apart from exceptions - receives a feedback on the statements or position papers. It would be good for the process and it would be an enrichment of the Open Method of Coordination, if there was any kind of reaction to the concepts and ideas that we elaborate by investing lots of working hours.' (Caritas Austria)

Overall, some Member Organisations had the feeling that *'even though the participation of civil society organisations was allowed for, not much was done by way of actively encouraging them to take part and contribute to the process'*. (Caritas Greece)

3.2.4 Relationship with the Lead NSR Civil Servant and Independent Expert

Despite some of the above mentioned issues, a number of the INCLUSION partners reported a positive relationship with their country's civil servant supervising the NSR process. This was the case even where Caritas has joined the process very recently, e.g. in Greece. Some Member Organisations observed the positive role that their previous participation in the Caritas Europa CONCEPT program had played in establishing a good working relationship.

'Caritas' working relationship vis-à-vis the government is a very encouraging one. Through CONCEPT, Caritas Malta has managed to stay in regular contact, which eventually brought about a very good working relationship.' (Caritas Malta)

'Very limited (because it was recently established) but very open, Caritas was received very warmly and we were given the opportunity to obtain any information we requested on the process, the draft NSR etc.' (Caritas Greece)

'It is a very good and uncomplicated relationship. The civil servants mainly involved are very interested in the experiences of Caritas in the social services area and in the basic social work. This time we missed a deadline for a statement. It was no problem to get another five days time period to submit it.' (Caritas Austria)

On the other hand, in other Member States, the relationship of Caritas with national independent experts was either non-existent or not very positive.

'We are in touch by phone and we invited him to a formal meeting. However the independent expert is so independent that he was never worried about the total absence of a relationship with civil society. In the past our country's NSR was treated like a paper exercise, and we can probably say the same about independent evaluations. In any case the previous evaluation had no impact whatsoever on civil society's life in the country.' (One of the Member Organisations)

There were a few exceptions however:

'This time Caritas Malta did not have any official meeting with the independent expert. However the relationship between Caritas Malta and the Maltese independent expert is quite a positive one. The expert was very helpful when asked for any help and/or suggestions.' (Caritas Malta)

'We have a very good relationship with the independent expert in this process. Dialogue with her is good.' (CORI Justice, Ireland)

3.2.5 Improvement and Increased Capacity through Caritas Europa Activities

Most Member Organisations expressed the view that compared to the previous round civil society participation in the NSR process has either deteriorated or at best remained the same.

'We have moved several steps back in comparison to the previous round.' (Caritas Italy)

'It has deteriorated. There was very extensive consultation previously. But the key issue is what outcome emerges from the actions contained in the NSR. Consultation without real outcomes is not an acceptable process.' (CORI Justice, Ireland)

Only a few Member Organisations noted positive changes compared to the previous round:

'I have the feeling there was more openness in the present round.' (Caritas Belgium)

'It has improved, for sure. To what extent is hard to say. [...] This time the NSR process started much earlier than last time. But the draft report was published about a month later than planned. So there was more time than during the last period, but still not enough, being aware of the fact, that it also needs time to discuss the strategies within the NGOs. On the other hand the time lines of the EU are very tight as well, so there hardly is any margin. But maybe it would make sense to design a longer period for the NSRs (3 years)?' (Caritas Austria)

'It appears as though the SPTF and the DWP have continued along the same trajectory since 2003. They have involved the poor via their respective organisations. Civil society also includes business and there is little doubt that business is also talking to government about policies, however they do not appear at consultations with the voluntary sector and this is a major flaw in the process. Their level of impact is hard to identify but hints of it can be seen in the latest green paper on social welfare reform.' (Caritas Social Action, UK)

Participation in the CONCEPT and INCLUSION projects have certainly been regarded as highly empowering factors in building the capacity and influence of Caritas Member Organisations:

'The National Coordinator was very available and very open to Caritas Portugal. We gave her the 2 CONCEPT reports and presented her the INCLUSION programme which she said is a much necessary activity for the civil society in Portugal. She even said that such activity could boost the work of the Social Institutions Forum. She expects more Caritas contributions in the future at the implementation and monitoring phases.' (Caritas Portugal)

One positive effect of Caritas Italy's involvement in the previous Caritas Europa CONCEPT programme and previous round of NSRs was that Caritas invited representatives of regional Caritas offices to take part in the INCLUSION programme and in the present and future rounds of NSRs. Another important initiative is the establishment of an Ufficio Europa at Caritas Italy headquarters, which will be providing training on European Social policy to the regional Caritas offices.

Reflecting on the NSR process in general, we would like to end with a thought-provoking comment from one of the Member Organisations:

'As ever, a big uncertainty and an unease concerning the importance of the NSR in the European politics are still prevailing in general. One view argues that the NSR process is a 'fringe process' and will not change anything with regard to the continued dominance of economic policies in the EU. Therefore it may not be worth getting too much involved. Another view – and we share it – sees in the NSR process a first step to make the EU politics more aware of social challenges.' (Caritas Austria)

3.3. The Extent of Civil Society Impact

The comments below provide a very good summary of what applies to most of the Member States concerning the impact the NGOs and Caritas in particular are making on the NSR design:

'It is not possible to find out to what extent Caritas influenced the NSR. First of all, besides Caritas there are other NGOs, with similar or close positions to those of Caritas. Secondly, our advocacy work is taking place all year round: We have press conferences, campaigns, discussions and meetings with politicians or other events to focus on our concerns. In addition to that, we try to influence legislation in the fields concerning Caritas clients, like people living in poverty, needing care and nursing, unemployed or poor families, etc.

Therefore it cannot be said whether contents in the NSR, which correspond to demands of Caritas, were adopted due to our comments in the NSR process or as a result of other advocacy activities.

We noticed that topics we missed in the last NSR are now main chapters in the new one, for example the integration of migrants or the special caring needs of elderly people or necessary educational reforms for disadvantaged children and youth.

In general the NSR process is not the place, where the political decisions appear to be made. The four priority objectives were also part of the existing Government Programme. The NSR report summarises more or less the political decisions and plans agreed on in the government. It is a good way to get an overview of the strategies and development in the social field against the background of the European Union.' (Caritas Austria)

In other words, advocacy should not be limited to the NSR nor to merely reacting to governments' invitations to attend meetings or submit written contributions. Through the Caritas Europa CONCEPT and INCLUSION projects, Caritas Member Organisations have come to realise that a much more effective way of influencing the social policy is by proactively offering their contribution to the policy process throughout the year and through different avenues, which in turn makes them a valued partner with expertise appreciated and called upon by the government. Caritas Europa has provided them with the competence and confidence for becoming such experts.

Realisation of the need to redefine organisational priorities to make place for advocacy was expressed by several Member Organisations both during INCLUSION working groups held in summer and in responses to the questionnaire:

'The involvement of civil society has a lot to do with the resources and strategic priorities that organisations have. Although we had the CONCEPT program (years I and II), it is only now that we are really entering this process. We can easily say that the EAPN is probably the NGO that is accompanying "on time" what is going on because it is a part of their daily work. Some other organisations do it also, like we, but not so closely. However we think that this is an important and strategic new line

of work that we are opening and that we will be much better at it in the next cycle.'
(Caritas Portugal)

Furthermore, it was noted that the process of involvement in the NSR process not only helps build NGOs' in general and Caritas' capacity in particular but has also enabled them to try to make new efforts to target advocacy on the most excluded and vulnerable groups in society. There is strong feeling that this new energy needs to be built upon.

Meanwhile, in some countries and especially the UK involvement has opened up fresh debates as the proper nature, form and contribution of the voluntary sector as the EU social policy process develops. The European model of social partnership poses new challenges and opportunities in the UK especially as to how the Churches in the poverty area should act and also to debates as to the appropriate attitude of Caritas members there to policy improvement, social advocacy and welfare delivery.

4. CONCLUSIONS

In the view of our respondents the judgment across the EU would still be "could do better". Once again the Caritas network of Member Organisations has been intimately involved in the NSR process in many varying local contexts and with intensely varying impact, in many cases dictated by local policy conditions.

However a number of fresh - or crucially reiterated - **observations** arise from this interim assessment of the NSRs.

First, that continuity and consistency were emerging as vital factors in assessing the NSRs. In the case of Slovenia, for example, priorities that had been included but that had not been achieved in previous NSRs were at risk of being excluded in current plans, despite the fact that they had not been achieved. More continuity might be achieved by moving to an extended rigorous evaluation of each round of the NSR, especially evaluating the extent to which the goals and targets have been achieved. **The European Commission may want to consider changing to 3-year NSR rounds in which one year is devoted both to evaluation and, perhaps more importantly, implementation of the measures outlined in the NSR in order that evidence can be gathered to truly monitor progress or lack of progress.**

Second, that when the member state government commits to **multiple layers of communication** with regard to consultation and design for the NSR's, this can have a considerable positive effect on both civil society engagement and civil society impact.

Such multiple layers could at the least take the form of web based consultation combined with face to face consultation and involvement.

At best they would also involve a process of establishing and nurturing profound relationships at the level where decisions about the NSR are made, the involvement of poor people themselves and other ways and means of open and structured dialogue.

In some cases, the communications about the NSR process have been much better this time round but in other cases they have been as confusing or demanding as on previous occasions. **Communication in multiple forms and by multiple processes is key to the realistic success and impact of the NSRs**

Third, and notwithstanding the first two comments *the general view is that the effectiveness of involvement and the quality of policy design has – at best – stayed level and – at worst – has deteriorated.*

Fourth, that this presents Caritas Europa in particular and civil society in general with a fundamental challenge namely to reflect on how it can “measure” the impact of its engagement and “benchmark” its contributions. *The form in which such improvement measurement needs to happen is a challenge that has not yet been resolved, resulting in unclear advocacy targets on the part of civil society at the outset and/or opaque criteria for partnership with civil society on the part of the state.* The new indicators being devised in France by the government may be one way through this conundrum

Fifth, that such advocacy priority setting needs to locate the NSR process more fully within the wider advocacy strategies of Caritas member organisations. By proactively approaching the government, “without waiting for an invitation,” Caritas member organisations can enhance their civic contributions in general while also embedding structures, programs and relationships that both enhance and reinforce their NSR contributions. The risk for NGOs of a lack of integrated practice is the same for governments in not adopting civil society participation and recommendations. Both can lead to a disempowering of the voluntary sector just as the opposite aspiration is in place.

Nevertheless NGOs and especially Caritas have a special mission and responsibility to make sure the needs of the most vulnerable and neglected groups (e.g. prisoners, displaced people, 18,000 citizens of former Yugoslavia without status) are addressed by the NSR and social policy in general.



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