

Berlin, May 2023

Statement on the German draft National Action Plan “New Opportunities for Children in Germany”

For the family organisations within the AGF, the European Child Guarantee is an important instrument both for combating child poverty in Germany and for at least mitigating the social inclusion deficits of children and young people. It was for this reason that the AGF made its voice heard very early by setting up a series of workshops and producing recommendations on the central topics of the EU Child Guarantee and its implementation in Germany.¹

The AGF greatly appreciated the German government’s commitment to the adoption of the European Child Guarantee throughout the drafting process, especially during the German Council Presidency in 2020. The joint declaration, which was initiated by Germany and finally endorsed by 24 Member States, had a lot of support from the German family associations, as well as from COFACE Families Europe.

Consequently, the AGF welcomes the fact that Germany, although one of the six remaining EU States that have not yet adopted a National Action Plan (NAP) for the implementation of the EU Child Guarantee, has now presented at least a working version of the NAP, which has yet to be agreed between the different ministries and obtain their approval.

Overall impression: the NAP lacks a future-oriented element

However, the family organisations regret that, as is evident in the draft, the Federal Government falls short of fulfilling its role as supporter and promoter of the European Child Guarantee, not only in terms of time, but also in terms of content. One of AGF’s recommendations was that, for the successful implementation of the Guarantee, “the National Action Plan that is to be drawn up, the AGF expects the Federal Government to encourage substantial progress in the individual thematic areas for opportunities for disadvantaged children to participate in society. The basis must be the objectives of the Child Guarantee against the background of the current situation in Germany. This means that the Action Plan must, where appropriate, go beyond the individual demands of the Child Guarantee in order to achieve its basic goals. It will not be sufficient to limit measures to those that already exist.”

Regrettably, the draft NAP precisely represents the scenario that is deemed to be unsatisfactory. There is scarcely any mention of new approaches inspired by the Child Guarantee that will lead to a fundamental improvement in the living situations of poor children and young people or those at risk of poverty. Instead, the NAP makes it clear that no additional financial resources will be provided. However, to combat child poverty and improve social

¹ AGF Recommendations for the National Action Plan for the Implementation of the Child Guarantee in Germany: https://www.ag-familie.de/media/docs22/DE_220531_AGF_CG_Empfehlungen.pdf. The Future Forum Family was not yet a member of the AGF when the AGF recommendations were formulated and had produced an impulse paper together with the AWO, which is also mentioned in the draft NAP: https://www.zukunftsforum-familie.de/wp-content/uploads/AWO_ZFF_Impulspapier-zur-Umsetzung-der-EU-Kindergarantie_2022_Final-11.pdf.



inclusion, further targeted investments are needed in the fields of action mentioned in the Child Guarantee, such as education, health and the living environment of children and young people in particular. The NAP lacks a visionary and future-oriented element, an element that contrasts the problem of poverty and its consequences among children and adolescents, which is split up into departments and social security codes and disaggregated into federal, state and municipal responsibilities, with the prospect of improved cooperation and approaches that bring together federal responsibilities, including any necessary investments. While other countries with similar structural conditions at least attempt in their NAPs to take a perspective on overcoming the fragmentation of poverty reduction and social inclusion policies, the German Action Plan remains a mere report and in its ambitions even falls behind the coalition agreement of the current federal government from 2021.

Description of the need for action

The draft NAP delineates the problem and the need for action. These outlines are based on the report of the BMFSFJ's (Federal Ministry of Family Affairs, Senior Citizens, Women and Youth) own conferences and especially on statements and papers submitted by associations and organisations. The recommendations of the AGF are also mentioned in the draft. The AGF very much welcomes the fact that the federal government takes up and expounds on the expertise of the associations and other specialists in its discussions. Last but not least, cooperation with civil society is among the recommendations of the Child Guarantee. The needs outlined in the draft are accurate in their description and convey a picture of the challenges. However, it is noticeable that the federal government refers only to experts' descriptions of situations. It is unclear whether the associations' analyses are shared by the federal government in this form or whether it is merely presenting "external" content.

Not least for reasons of time, the AGF will not, at this point, go in detail into the NAP's treatment of the different topics of the Child Guarantee. It has presented its proposals and considerations on the need for action and measures in detail in its recommendation paper. For discussion of the central fields of action, we therefore refer to the detailed AGF recommendations for the NAP for implementation of the Child Guarantee in Germany (see footnote 1). However, some structural points should be briefly highlighted.

Planning and measures: extensive lists, no progress on content

While the draft NAP refers to the needs for action put forward by the expertise of the associations and other specialists, the corresponding recommendations for action, as set out in the written statements and positions of members of civil society, are largely omitted. There is no in-depth discussion of these recommendations for action to improve the situation of impoverished children and young people. Instead, the draft lists projects and measures taken by the ministries and refers to the current activities of the Länder, municipalities and cooperation partners, without systematically classifying them in terms of goal achievement and significance. The NAP also refrains from making systematic connections with the challenges of particularly affected groups, especially in the federal measures. These include single-parent households, children from large families and children with a migration background.

Measures are set side by side

The draft NAP does provide a very good overview of ongoing and planned measures. It chooses the approach of juxtaposing existing (and some planned) measures on different levels and implemented by different actors. In doing so, however, the draft reproduces the fragmentation of policies to deal with poverty among children and young people, even though, for a proper implementation of the Child Guarantee, ideas for integrating perspectives and solving compartmentalisation would actually be necessary. There is scarcely any mention of approaches to tackling the complex multi-layered problems of children, young people and families in poverty through an



integrated plan of action. Approaches are needed that are thought out from the point of view of those affected and not from the point of view of those who have the responsibility. With a lot of good will, the draft NAP can be interpreted in such a way that the stock of measures at different levels and by different actors becomes the first step towards overcoming the pillarisation and fragmentation of poverty policies. Unfortunately, however, the NAP lacks strategic ambition as to how the federal government might solve the grave and profoundly regrettable problems of child poverty and social exclusion that have long plagued one of the richest countries in the world, within the foreseeable future.

Listed plans fall short of the coalition agreement

At this point, the AGF refrains from commenting on and evaluating individual measures from the catalogue. However, the categorisation of measures chosen in the draft NAP is surprising and leaves some questions unanswered. A distinction is made between a) measures already being implemented, b) measures in planning, and c) measures named in the coalition agreement.

It remains unclear whether the projects listed only under "coalition agreement" are still "in planning" or whether these objectives of the coalition agreement relating to children and families are no longer being pursued. However, apart from the surprising distinction between "planned projects" and "projects in the coalition agreement", the draft NAP does not even mention all the projects of the coalition agreement. This applies to the following, among others.

- The draft NAP itself, by citing the Council recommendation, calls for ensuring "consistency of social, education, health, nutrition and housing policies at national, regional and local level and, wherever possible, improve their relevance for supporting children in an integrated manner;" and "continue and where necessary step up investment in education, adequate health and social protection systems in order to address effectively the needs of children and their families, in particular of those exposed to social exclusion". The current federal government's coalition agreement also states that, "Together with the Länder, we will significantly increase public spending on education and ensure that long-term support reaches the places where it is most needed."² The list of measures in the NAP no longer mentions this.
- According to the coalition agreement, the government "strives for closer, more targeted and binding cooperation between all levels (cooperation requirement). To this end, we want to take the combined local power of school authorities, the independence of the Länder in respect of culture and education and the supportive potential of the federal government to a new level and establish a new culture in educational cooperation". Such a goal would also be desirable for the NAP, especially if it were backed up by concrete measures. Instead, the NAP refers several times and very explicitly to "the various competences".
- The draft NAP mentions the planned basic child allowance. This is gratifying, in that a basic child allowance that is financially sound and designed around the needs of children can be a cornerstone in the fight against family poverty. However, there is no mention of the fact that, according to the coalition agreement, the socio-cultural subsistence minimum is to be redefined.
- Housing is explicitly mentioned in the Child Guarantee and homelessness as a particular problem. There are statements on this in the coalition agreement, but they did not make it into the NAP as plans. For example: "We will promptly launch a new non-profit housing scheme with tax incentives and investment subsidies and thus create a new dynamic in the construction of and permanent social commitment to affordable housing. [...] In order to eliminate the causes of impending homelessness, we will evaluate and challenge tenancy law,

² Translation of the coalition agreement by AGF.

especially where grace period payments stand in the way of continued tenancy. We have set ourselves the goal of overcoming (street) homelessness by 2030 and are launching a National Action Plan to this end."

- The abandonment of the pledge to "further develop the care leave and family care leave laws and enable caring relatives and loved ones to have more independent control over their time, also by granting a wage replacement benefit when someone takes care-related time off" is very regrettable, because this could prove to be highly relevant to the risk of poverty among families with children and young people in need of care.

Further examples can be found in other thematic areas, including health. In all cases, it would be desirable for the federal government to use the opportunity of the Child Guarantee, rather than omitting these concerns, to concretise them and at least outline approaches to implementation. In the case of housing, for example, it would have made sense for the draft NAP to give more detail on family-specific measures. There is no perspective on how the federal government, in cooperation with the Länder and municipalities, plans to make the social allocation of housing for families disadvantaged in the housing market more effective, how the opportunities of agreeing on occupancy rights are to be extended and how the protection of tenants and the prevention of displacement and forced evictions for socio-economically disadvantaged families with children can be improved in the medium term.

In this respect, the NAP unfortunately falls short of the coalition agreement. In view of the crisis facing children and families affected by poverty, this is a very bad sign – not only for the implementation of the Child Guarantee, but also for the fight against child and family poverty as a whole.

Participation and cooperation

The federal government emphasises that it plans to involve associations, organisations and other experts, as well as the direct participation of children and young people, for which new methods are to be developed, especially for the latter. This is a reasonable approach. The AGF strongly encourages actively involving children and young people in the implementation process and taking them seriously. This goes far beyond the participation in individual discussion rounds or panels that happens quite often. What is needed is a process for intensive participation that is long-term and tailored to children and young people, using a mix of methods throughout the entire process.

The draft also asserts that a large part of the further process is to be coordinated by a NAP committee. This committee is to "monitor the measures and advise on the updating of the NAP". The AGF welcomes the future focus on productive cooperation between different actors, which should be at the centre of further implementation. It also welcomes the fact that the committee will also include the perspective of families.

However, it remains somewhat unclear what the exact mandate of the new committee will be and what resources and competences will be available to it. If the positions and ideas of the actors involved are to be taken seriously, the committee needs a certain degree of autonomy and its own room for manoeuvre, as well as a budget. The goal must be to find and implement the best solutions for poverty prevention and reduction in a joint effort. Importantly, the federal government must always make transparent how it deals with the proposals of the actors involved. This applies to proposals from associations, organisations and other experts, those from children and young people and those from the NAP committee as a whole. Not every suggestion needs to be implemented exactly as submitted. However, plausible reasons why ideas were not implemented or did not find their way into the further process must be given.

Monitoring

The EU Child Guarantee requires governments to report on progress every two years. This is a reasonable way to ensure that the efforts to implement the Guarantee do not slacken and can be adapted to current circumstances.



The draft NAP rightly takes up this proposal. In order for the reporting to make a meaningful contribution, sound monitoring is necessary. It is therefore good that the federal government plans to involve the German Youth Institute (DJI), an established scientific institution, for monitoring an established scientific institution for monitoring. However, the family organisations note the absence of concrete information in the draft NAP about the development of a monitoring instrument to measure progress in the fight against poverty and the promotion of participation for poor children and young people and those at risk of poverty, such as operationalisable, measurable targets and plans to measure the success of political initiatives.

From the AGF's point of view, in addition to recording poverty rates, indicators should also be included that can demonstrate the outcomes of the measures, such as the development of social inclusion for children and young people. It would also be plausible for the federal government to examine the effectiveness of new projects that are intended, for example, to overcome the fragmentation of individual policies for reducing poverty and increasing participation. The planned scientific monitoring, as well as the NAP's own claim to evaluate the results of the reporting in political terms with the relevant stakeholders in order to formulate further steps, makes sense. This could offer innovative solutions that the federal governments will have to take up in the continuing process until 2030.

Interdepartmental budgets for the implementation of the EU Child Guarantee

The fight against poverty and its consequences is a question of financial resources, but not of these alone. The NAP makes it clear that the federal government does not plan to make additional funds available to any large extent for the implementation of the EU Child Guarantee or to bundle together interdepartmental funds that are aimed at preventing or dealing with the consequences of poverty among children and young people in any sort of integrated strategy. Instead, the introduction to the list of measures in the annex could hardly be more qualified in tone: "These are both existing and planned departmental measures, including those arising from the coalition agreement whose feasibility has not yet been fully assessed, but also measures from the coalition agreement that are neither coordinated within the federal government nor backed by financial resources." This is highly regrettable, because it calls into question the very support of children's social inclusion. Instead, in order to achieve the goals of the EU Child Guarantee and to enable more tailored solutions for complex problem situations and for impoverished children and young people at risk of poverty and their families, the AGF believes that cross-departmental and cross-federal cooperation would be crucial. For this, a multidisciplinary steering group and a joint cross-sectoral budget could be useful, so that innovative forms of reducing poverty and promoting participation can be tested.

Summary and outlook

The federal government took almost two years to prepare the present draft. This long gestation suggests that time was taken up with complicated coordination between the ministries. This would have the positive consequence that the ministries concerned would have to deal with the issues of child poverty and social inclusion, even though they had no obvious competence in the area.

However, the time was obviously not used to establish a joint effort of all ministries, and thus to give the document a future-oriented, creative perspective with a horizon beyond the end of the current legislative period. The family associations find it unsatisfactory that the draft National Action Plan conforms to a very limited extent only with the character of a political action plan. High levels of child poverty have existed in Germany for several decades and the political measures of the last governments have made scarcely a dent in the extent and individual drama of child poverty. The family associations' expectations for a National Action Plan to implement the European Child Guarantee would have been a critical analysis of the inadequate policies on poverty and the development of a



perspective lasting and cross-legislative period of systematically combating child poverty and social exclusion and identifying concrete steps towards this goal. However, the draft NAP shows that there is currently no holistic view of child poverty in which both infrastructural and monetary policies are jointly thought through across the different (levels of) responsibility to form a comprehensive overall strategy. The limited explanations of the plans and measures also suggest that there is a lack of willingness to consider the necessary funds as an investment in the present and future of children and young people and thus to spare them the effects of early poverty and exclusion. The federal government stresses that it regards the National Action Plan as a dynamic process. All in all, we hope for an collective work towards an implementation of the Child Guarantee that will in future provide the impetus for an innovative child poverty policy that is interdepartmental and integrates federal levels of authority.