

**UNICE comments on the draft guidelines for  
the EQUAL Community Initiative**

**(COM (1999) 476 Final)**

**SUMMARY OF THE UNICE POSITION**

*UNICE welcomes the approach of the draft guidelines for EQUAL, and in particular the link between this initiative and the European Employment Strategy. It supports the overall objective of EQUAL of developing innovation to combat discrimination and inequalities in connection with the labour market. However, the draft guidelines create confusion as to the actual objectives EQUAL seeks to achieve and the overall strategy of the European Commission. EQUAL should concentrate on its key-objective of combating discrimination rather than trying to bring together – under a single initiative – all the previous programmes (i.e. ADAPT, EMPLOYMENT). Furthermore, UNICE is of the opinion that the draft guidelines lack clarity and that procedures for the implementation of EQUAL are far too complicated and bureaucratic. Therefore, UNICE invites the Commission to amend the draft guidelines to take the following comments into account.*

**I. General comments**

1. UNICE broadly welcomes the draft guidelines for the EQUAL initiative. It supports the general objective of combating discrimination and inequalities on the labour market and therefore largely shares the general objectives and principles of this initiative. In particular, UNICE endorses the emphasis that the draft EQUAL guidelines place on the labour market dimension, with the European Social Fund remaining the preferred instrument for implementation of the employment guidelines. UNICE also supports the reference to a broad range of forms of discrimination and the use of decentralised action plans
2. However, UNICE wonders about the coherence and clarity of the Commission's overall strategy in the more general framework of the European employment strategy. Thus, UNICE still has questions about what distinguishes the EQUAL initiative from activities in the context of the new objective 3.
3. UNICE supports the approach based on innovation and transnational cooperation (paragraph 4) but regrets that these two aspects are of a more peripheral nature for the development partnerships (DPs). The added value of an initiative such as EQUAL lies precisely in the possibility of pilot action with an innovative character. Although UNICE agrees that DPs should demonstrate a real potential for transnational cooperation from the moment when projects are presented, it would be unrealistic to expect full partnership to be in place at that stage. This would circumvent some difficulties encountered with earlier Community initiatives (e.g. projects whose objectives are defined in such a way as artificially to fit in with another Member State's priorities). In this regard, lessons should be learnt from the ADAPT and EMPLOYMENT initiatives (paragraph 5).

4. UNICE contests the Commission's analysis concerning inadequate participation by business in initiatives of this type (paragraph 6). There are many examples of the active involvement of companies (or business federations). The crucial point here is to encourage companies to play a more active role.

Yet, too often, companies are put off by the use of largely unintelligible jargon, by the time they must invest due to the heavy bureaucracy of such initiatives. This involves information and awareness campaigns, and a marketing exercise to underline the added value and benefits of company involvement in the EQUAL initiative and reduction in bureaucracy (see paragraph 14, below).

5. In UNICE's view, implementation of the EQUAL initiative must be closely linked to the European employment strategy (paragraph 9). It should be stressed here that the causes of unemployment vary across Europe. Hence, the choice of thematic priorities must be sufficiently wide to take account of national situations. Also, in the framework of the EQUAL initiative, it is important to ensure that all of the four pillars of the European employment strategy are taken into account, and in particular the entrepreneurship pillar. If the employment situation is improving, it is thanks to the creation of new businesses and development of existing ones.
6. UNICE supports the thematic approach of EQUAL with its direct link to Member State priorities and the European Employment Strategy. However, the guidelines for the initiative should be more explicit about the link between the thematic horizontal approach (i.e. priority themes) and the necessary approach that refers to target groups (apart from asylum seekers).
7. Generally speaking, implementation of the EQUAL initiative seems to be complicated and heavily bureaucratic. Among other things, UNICE has queries about the need to distinguish between "geographical" DPs and "sectoral" DPs (paragraph 12). Moreover, sections II and III of the document are unclear. Actions 1, 2 and 3 should be brought together under a single heading. Action 4 (technical assistance) is horizontal by nature insofar as it covers both actions to implement EQUAL and actions at European level, and should be accommodated in a separate section.
8. All in all, the decision-making procedures are unclear and there are insufficient details about participation of the social partners. In particular, the social partners must be involved in preparation, monitoring and evaluation of Community initiative programmes, and in definition of the thematic priorities.

## **II. Detailed comments**

### **Thematic fields are too wide-ranging and should be reformulated (paragraph 9)**

9. UNICE supports the Commission's approach of concentrating EQUAL action on a number of thematic priorities which would be reviewed periodically to take account of developments on the labour market. However, the present wording of the thematic fields is too vague with some themes being horizontal (e.g. introduction of new technologies) while others cut across each other (e.g. combating racism in the workplace and developing inclusive work practices). Thematic priorities need to be reformulated so as to ensure that they are focused on combating discrimination and inequalities in connection with the labour market.

### **Asylum seekers should be defined more clearly (paragraphs 14 to 16)**

10. Article 20 of regulation 1260/99 on the general provisions governing the structural funds provides for asylum seekers to be taken into account in the EQUAL initiative, although access to the labour

market for this category of persons is proscribed or subject to very restrictive conditions at national level. Hence, the Commission interprets the notion of asylum seeker widely in order to cover other categories of persons. The categories of persons that can enjoy support under the EQUAL initiative should be more clearly defined, while respecting the legislation in force at national level.

### **More clarity needed on actions within EQUAL (paragraphs 19 to 21)**

11. Paragraph 21 is not very clear. In fact, the three actions constitute the three stages of a DP provided that the latter is adopted at the end of action 1. In addition, what is meant by the reference to “actions achieving the same results”?

### **Arrangements within EQUAL are too complex and bureaucratic (paragraphs 38 to 54)**

#### *Action 3 (paragraphs 38 and 39)*

12. If UNICE endorses the wish to ensure mainstreaming of activities under the EQUAL initiative, its implementation is too heavy (cost-benefit ratio) and too bureaucratic (e.g. participation of DP promoters in meetings of the steering committees set up for each thematic area). Concerning DPs (paragraph 39), their role should not consist in putting in place mechanisms which favour an impact on national policy. This role should fall to the management authority at national level. A very clear distinction should be made between the impact on national employment policy and the impact at European level. The two elements differ in terms of both their content and the mechanisms for implementation.

#### *Actions at European level (paragraphs 43 to 46)*

13. The thematic review (paragraph 44) and periodic assessments (paragraph 45) suggest a bottom-up logic. If a link is to be established between the EQUAL initiative and national action plans, it should really be top-down. Thus, instead of a periodic assessment, a thematic network and dissemination of activities could be promoted. UNICE considers that creation of new discussion fora (paragraph 46) over and above those which already exist would disperse and duplicate efforts.

#### *Preparation, presentation and approval of programmes (paragraphs 48 to 54)*

14. The description of procedures in section IV is very detailed and may result in heavy bureaucracy. UNICE invites the Commission to put in place procedures which are sufficiently flexible to avoid rigidities. Governments should consult social partners, at the appropriate level, for preparation of proposals for CIPs (paragraph 49) as well as for monitoring and evaluation of national programmes (paragraphs 55 and 56).

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