Opinion of the Deutscher Verein für öffentliche und private Fürsorge e.V. (German Association for Public and Private Welfare) regarding the European Commission consultation on reinforcing social Europe

The opinion (DV 6/20) was adopted on 30 April 2020.

Deutscher Verein für öffentliche und private Fürsorge e.V. (German Association for Public and Private Welfare) – the forum for the social sector since 1880.

The German Association for Public and Private Welfare (Deutscher Verein für öffentliche und private Fürsorge e.V.) is the joint forum of municipalities and non-statutory social welfare organisations and their social services in Germany, the Länder (federal states) and academia in all fields of social work and social policy. Through its experience and expertise, it monitors and shapes policy and legislation in relation to children, young people and families, the social insurance system, social assistance, assistance for the elderly, care and rehabilitation, social volunteering, the planning and management of social work and social services as well as international and European social policy and social legislation.

Transparency Reg. No. 14766442240-14



Inhalt

| 1) | Reinforcing Social Europe | 3 |
|----|--|----|
| 2) | Pursuing social goals in a European overall strategy from 2021 | 4 |
| 3) | Designing practically-oriented EU structural funding to strengthen social cohesion | 5 |
| 4) | Pursuing upward social convergence at a high level | 5 |
| 5) | Further implementation of the "European Pillar of Social Rights" a) Pursuing the EU strategy for equality with a broad-based | 6 |
| | approach (Principle 2 of the EPSR)b) Reinforcing anti-discrimination provisions at EU level | 7 |
| | (Principle 3 of the EPSR) | 8 |
| | c) Work-life balance (Principle 9 of the EPSR) | 8 |
| | d) Minimum income (Principle 14 of the EPSR) | 9 |
| | e) Old age income and pensions (Principle 15 of the EPSR) | 9 |
| | f) Inclusion of people with disabilities (Principle 17 of the EPSR) | 10 |
| | g) Long-term care (Principle 18 of the EPSR) | 10 |

The German Association welcomes the announcement by the new European Commission, in view of environmental, digital and demographic change, to pursue a strong social Europe to enable just transitions to the society of the future. The German Association is calling for the setting of social goals in a European overall strategy from 2021 and for practically-oriented EU structural funding to strengthen social cohesion. To achieve upward social convergence at a high level, it supports the further implementation of the European Pillar of Social Rights at EU level and in the member states. In doing so, national, regional and local interests and the interests of civil society should be broadly incorporated in the European process of shaping policy.

1) Reinforcing Social Europe

In its Communication "A strong social Europe for just transitions" of 14 January 2020¹, the new European Commission sets out how it intends to respond in the area of social policy to the economic change resulting from the move to a climate-neutral way of working by 2050, to the digitisation of work processes and to demographic change, notably due to population ageing and movement to cities. "The European Pillar of Social Rights is the European answer to these fundamental ambitions. It is our social strategy to make sure that the transitions of climate-neutrality, digitalisation and demographic change are socially fair and just." The Communication already contains a list of initiatives at EU level aimed at supporting implementation of the European Pillar of Social Rights (EPSR) in 2020 and 2021, and is simultaneously intended to prepare the way for the setting out of an Action Plan for future implementation of the EPSR at EU level and in the Member States which is to be published in early 2021. To that end, the Commission is seeking to initiate a broadly-based debate via the current consultation².

The German Association welcomes the announcement by the Commission, in view of environmental, digital and demographic change, to pursue a strong social Europe that enables just transitions to the society of the future. From the perspective of the German Association³, a social Europe is characterized by activities of the European Commission, of the European Parliament and of the Council of the European Union which collectively set powerful impulses for upward social convergence of the social benefit systems of the member states at a high level, flanked by adequate structural assistance to strengthen social cohesion and with clear social goals in an overall strategy for policy coordination in the EU, with national, regional and local interests together with the interests of civil society being broadly incorporated in the European process of shaping policy. In this regard, deepening the EU's social dimension also requires social shaping of the digital transformation.

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³ Expectations of the German Association for Public and Private Welfare regarding the European Union on the occasion of the European Elections 2019: Perspective for a social Europe, NDV 2019, 49 et seq.



¹ COM(2020) 14 of 14 January 2020, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX-:52020DC0014

² Consultation page "Give your opinion on reinforcing social Europe": https://ec.europa.eu/eusurvey/runner/8257efae-81ed-bee9-ccab-e143deae5ea2

The German Association welcomes the fact that the Commission, in its Communication, is already announcing social policy initiatives at EU level for all quarters of 2020 and for 2021 that are geared to the EPSR, and intends to submit an Action Plan in early 2021 for the further implementation of the EPSR.

2) Pursuing social goals in a European overall strategy from 2021

The "Europe 2020" strategy runs until the end of 2020; under it, the EU has been pursuing "smart, sustainable and inclusive growth" since 2010 and set itself key targets, including in the areas of employment, education and social inclusion, to realize that strategy. The European Council presented "A new strategic agenda 2019-2024" ⁵ in June 2019, in which it offers very guarded pronouncements on social principles and rights. Having regard to strengthening the social dimension in the EU, the German Association is once again⁶ speaking out in favour of continuing key elements of the "Europe 2020" strategy in a new overall strategy for the EU from 2021. For instance, explicit social objectives should be defined and the achievement of those objectives monitored in the "European Semester", including monitoring implementation of the EPSR, e.g. in the "Social Scoreboard". Clear social aspects need to be incorporated in an overall strategy, in the opinion of the German Association, in order to achieve a social market economy that aims at full employment and social progress, or upward social convergence at a high level. The European added value results clearly from the fact that individual member states in the Union cannot achieve the exchange with all member states and concerted, effective coordination of economic, employment and social policies in response to Europe-wide phenomena on their own.7

In the view of the German Association⁸, a new overall strategy for the EU also needs to integrate the aims of the United Nations' "2030 Agenda for Sustainable Development", such as the aims for combating poverty, for reducing inequalities and for gender equality.

⁹ https://www.bundesregierung.de/breg-en/issues/sustainability/global-goals-for-sustainable-development-355956



⁴ Communication of the European Commission "Europe 2020 – A strategy for smart, sustainable and inclusive growth" of 3 March 2010, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52010DC2020; "A new European strategy for jobs and growth", Conclusions of the European Council of 17 June 2010, https://data.consilium.europa.eu/doc/document/ST-13-2010-REV-1/en/pdf

⁵ https://www.consilium.europa.eu/media/39914/a-new-strategic-agenda-2019-2024-en.pdf

Expectations of the Deutscher Verein für öffentliche und private Fürsorge e.V. (German Association for Public and Private Welfare) regarding the German government for its Presidency of the Council of the European Union 2020, NDV 2020, 11 et seq.; Expectations of the German Association for Public and Private Welfare regarding the European Union on the occasion of the European Elections 2019: Perspective for a social Europe, NDV 2019, 49 et seq.

Expectations of the German Association for Public and Private Welfare regarding the European Union on the occasion of the European Elections 2019: Perspective for a social Europe, NDV 2019, 49 et seq.

⁸ Expectations of the Deutscher Verein für öffentliche und private Fürsorge e.V. (German Association for Public and Private Welfare) regarding the German government for its Presidency of the Council of the European Union 2020, NDV 2020, 11 et seq.; Expectations of the German Association for Public and Private Welfare regarding the European Union on the occasion of the European Elections 2019: Perspective for a social Europe, NDV 2019, 49 et seq.

3) Designing practically-oriented EU structural funding to strengthen social cohesion

It is important to the German Association that the draft Regulation for the European Social Fund from 2021 (ESF+) takes particular account of the principles and rights set out in the EPSR. ¹⁰ The EU, as a political union, should also provide impetus to the member states to acknowledge their public responsibility in framing their social welfare systems and social services and to aspire to a policy of social investment. As early as in its "Social Investment Package" of 2013, the European Commission underlined the point that precisely those countries with the most efficient social systems were amongst the most successful and most competitive economies in the world, and called on the member states to put greater emphasis on social investment. The German Association expressly welcomed at that time the European Commission's view in regarding expenditures for social purposes as sustainable investments in people and in social cohesion, and not simply as a cost factor. ¹¹

To apply EU funding in the most practically-oriented manner, the German Association is committed to involving civil society, in line with the partnership principle. The partnership approach enables intensive participation by partners in civil society at the level of developing and implementing funding programmes at member state level. The partnership arrangement of the Funds is demonstrably a success factor in implementation of the current ESF and of the Fund for European Aid to the Most Deprived (FEAD) in Germany. It should be expressly anchored in the new ESF+ Regulation, in the same way as it is defined in the new EU Common Provisions Regulation. In order to effectively align structural funding to the goal of upward convergence, it is necessary that the European Commission adopt effective measures to increase the draw-down of funds. This includes retaining the EU co-financing principles from the current funding period, in order to ensure that as many project sponsors as possible are able to use funds from the ESF+ programmes from 2021. Experience has shown in practice that project sponsors are often unable to contribute higher own shares to funding. Added to this is the fact that the proposed funding quotas, measured against the organisational and financial expenditure involved in applying and accounting for ESF funds, set too low an incentive.

4) Pursuing upward social convergence at a high level

Just as a prospering economy in the EU enables people to share in society and in the labour market, permanent economic success is based on effective and efficient social policy. The German Association is calling for the potential and the in-

¹¹ Deutscher Verein's Opinion on the European Commission's Communication "Towards Social Investment for Growth and Cohesion", NDV 2013, 298 f.



Expectations of the Deutscher Verein für öffentliche und private Fürsorge e.V. (German Association for Public and Private Welfare) regarding the German government for its Presidency of the Council of the European Union 2020, NDV 2020, 11 et seq.; Expectations of the German Association for Public and Private Welfare regarding the European Union on the occasion of the European Elections 2019: Perspective for a social Europe, NDV 2019, 49 et seq.

struments set out in the Treaties¹² to be exploited, in order to deepen the EU's social dimension.¹³

The German Association takes the view¹⁴ that social policy can equally make a contribution to growth and employment, whilst it should also be a pillar of EU policy in its own right. The EPSR, as a guideline for better implementation of social principles and rights in concrete legislation, must therefore be understood as a supporting element of the future European economic and social model.¹⁵ The German Association supports the goal, via the EPSR, of driving upward social convergence in the interests of improved economic and social cohesion in the EU and of supporting the member states in this regard over reform proposals. In doing this, it draws attention to the fact that the necessary consideration of the different traditions and systems of social policy in the individual member states is to be secured through upholding member state competences and respecting the principle of subsidiarity and proportionality in the individual EU initiatives to implement the Pillar.¹⁶

5) Further implementation of the "European Pillar of Social Rights"

In the EPSR, a plan was agreed in 2017¹⁷ to strengthen the social dimension of the EU politically and to work towards upward convergence of the social systems of the member states. The EPSR sets out 20 employment and social policy principles and social rights to be realized in all EU member states. The first proposals under the EPSR have now become applicable EU law, e.g. minimum standards for accessibility of products and services, employment contracts being specified in writing, and the release of working parents and carers to undertake the work of caring and support.¹⁸ It is now important that this is followed up with further initiatives to implement the remaining principles and rights of the EPSR. What is vital, for the German Association, is not that the EPSR exists as a text, but that it supports an improved reality of life in society for people through appropriate initiatives for

Directive (EU) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services, OJ L 151 of 7.6.2019, p. 70; Directive (EU) 2019/1152 of the European Parliament and of the Council of 20 June 2019 on transparent and predictable working conditions in the European Union, OJ L 186 of 11.7.2019, p. 105; Directive (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance for parents and carers and repealing Directive 2010/18/EU, OJ L 188 of 12.7.2019, p. 79.



¹² Art. 3 (3) TEU, Art. 8-10 TFEU, Art. 26-34 of the Charter of Fundamental Rights of the European Union, Art. 4 (2) together with Art. 151 et seq. TFEU, Art. 5 (3) together with Art. 156 TFEU, Art. 5 (2) together with Art. 145 et seq. TFEU, Art. 157 TFEU, Art. 162 et seq. TFEU

¹³ Expectations of the German Association for Public and Private Welfare regarding the European Union on the occasion of the European Elections 2019: Perspective for a social Europe, NDV 2019, 49 et seq.

¹⁴ Expectations of the German Association for Public and Private Welfare regarding the European Union on the occasion of the European Elections 2019: Perspective for a social Europe, NDV 2019, 49 ff; Opinion of the German Association for strengthening the social dimension of EU policy – establishing effective and reliable welfare provision systems, NDV 2016, 65

¹⁵ Expectations of the German Association for Public and Private Welfare regarding the European Union on the occasion of the European Elections 2019: Perspective for a social Europe, NDV 2019, 49 et seq.; Opinion of the German Association on the European Pillar of Social Rights, NDV 2018, 64 et seq.

¹⁶ Expectations of the German Association for Public and Private Welfare regarding the European Union on the occasion of the European Elections 2019: Perspective for a social Europe, NDV 2019, 49 et seq.; Opinion of the German Association on the European Pillar of Social Rights, NDV 2018, 64 et seq.

¹⁷ Interinstitutional Proclamation on the European Pillar of Social Rights, OJ C 428/10, 13 December 2017, https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017C1213(01)&from=DE

implementation at EU level and thus supports improved economic and social cohesion in the EU¹⁹.

The German Association hereby again calls on the European Commission and the member states²⁰ to adopt the principles for effective and reliable social welfare provision systems put forward by the European Economic and Social Committee (EESC) and to continue to develop their social welfare provision systems on that basis: the principle of a social protection floor, principle of need, principle of a precise definition of aims, principle of accessibility, principle of proportionality, principle of solidarity, principle of personal responsibility, principle of participation, principle of structure, principle of the user's right to decide, principle of legal certainty, principle of public interest, principle of transparency, principle of a joined-up approach, principle of a level playing field, principle of quality, principle of coordination²¹. With regard to improving the social circumstances in the member states, the German Association again makes reference²² to the good experiences with the principle of subsidiarity being applied in Germany, including an active role for civil society²³, and to the solidarity-based financing of social welfare provision systems. It calls on the member states to aspire to social policy convergence of European social welfare provision systems at a high level and, in doing so, to include the regional and local authority actors, the social insurance providers, and actors in civil society such as the Freie Wohlfahrtspflege (non-statutory social welfare organizations in Germany).

Against this background, the German Association – on the basis of its extensive practical experience in Germany – wishes to give advice to the European Commission, the European Parliament, the Council and the member states on individual policy areas ²⁴ which the EU has taken up on the European Pillar of Social Rights:

a) Pursuing the EU strategy for equality with a broad-based approach (Principle 2 of the EPSR)

The German Association welcomes the fact that the European Commission has approved a "Gender equality strategy 2020-2025" In its opinion 6, the previous

- 19 Opinion of the German Association on the European Pillar of Social Rights, NDV 2018, 64 et seq.
- 20 Opinion of the German Association on the European Pillar of Social Rights, NDV 2018, 64 et seq.; Opinion of the German Association for strengthening the social dimension of EU policy establishing effective and reliable welfare provision systems of 15 December 2015, NDV 2016, 63 et seq.
- 21 Opinion of the European Economic and Social Committee on "Principles for effective and reliable welfare provision systems" of 17 September 2015 (SOC/520), https://eur-lex.europa.eu/legal-content/EN/TXT/PD-F/?uri=CELEX:52015IE1011&from=EN
- 22 Opinion of the German Association on the European Pillar of Social Rights, NDV 2018, 64 et seq.
- 23 In simplified form, the principle of subsidiarity means: Those things which the individual, the family or groups and corporations are able to do for themselves should not be subsumed either by a superior body or by the state. It should be ensured that competence and responsibility of the respective living unit is recognized and used. However, this also includes the duty of the state to strengthen the smaller units if necessary, such that they can become correspondingly active. The recognition of social initiatives that finds expression in the principle of subsidiarity enables the needy in society to have a right of choice. This has its roots in the constitutional rights: Respect for human dignity, freedom of the person and of personal development, freedom of belief.
- Opinion of the German Association on the European Pillar of Social Rights, NDV 2018, 64 et seq.
- 25 "A Union of Equality: Gender Equality Strategy 2020-2025", COM(2020) of 05.03.2020, https://eur-lex.eu-ropa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0152&qid=1591863483872
- 26 Expectations of the Deutscher Verein für öffentliche und private Fürsorge e.V. (German Association for Public and Private Welfare) regarding the German government for its Presidency of the Council of the European Union 2020, NDV 2020, 11 et seq.



"strategic engagement", based on a Commission staff working document, was inadequate and a multi-year policy strategy of the full European Commission is needed which is implemented in committed fashion by the EU and its member states. The German Association welcomes the fact that the strategy focuses not only on the principle of wage transparency, but also on good working conditions. "Equal pay for equal work" is a key aspect, to lower the higher risk of poverty for women. But it likewise relates to the fair distribution of care or support tasks and housework between women and men, to the breaking down of persistent gender stereotypes and to measures for the effective prevention of violence against women. What is needed is the pursuit of a broad-based approach to reducing discrimination against women at EU level and in the member states. In doing so, the experiences and suggestions coming from equality work by civil society organizations and by local authority and regional administrations should be used when implementing the new strategy.

b) Reinforcing anti-discrimination provisions at EU level (Principle 3 of the EPSR)

The German Association would welcome a new draft Directive from the Commission for better implementation of the ban on discrimination.²⁷ Alongside the right to realization of gender equality, the EPSR also gives expression to the right of all persons to equal treatment with regard to social protection, education and access to publicly-available goods and services. This corresponds to the bans on discrimination in the Treaties set out in primary legislation. However, there is currently an absence of secondary legislatory provisions for protection against discrimination in daily life on the grounds of religion or belief, disability, age or sexual orientation in accordance with Art. 18, 19 of the Treaty on the Functioning of the European Union (TFEU), other than in relation to employment and career.

c) Work-life balance (Principle 9 of the EPSR)

Measures for improved compatibility of family and career benefit family members by contributing to a raised sense of well-being. However, they can also raise employment levels, particularly for women, and boost the economy. In this regard, the German Association argues for a work-life balance that extends over the full course of life. This is because that balance relates not just to the period of bringing up children, but is also a challenge when caring for family members. The German Association is therefore calling for an appreciable time easement²⁸ for combining caring with a career. The need-appropriate expansion of care offers is essential for compatibility of bringing up children and a career²⁹. Alongside framing infrastructural and financial conditions, time represents the most important resource in caring for a

²⁹ Opinion of the German Association on the European Pillar of Social Rights, NDV 2018, 64 et seq.; Recommendations by the Deutscher Verein on local family time policy, NDV 2013, 296 et seq.



²⁷ Expectations of the Deutscher Verein für öffentliche und private Fürsorge e.V. (German Association for Public and Private Welfare) regarding the German government for its Presidency of the Council of the European Union 2020, NDV 2020, 11 et seq.

²⁸ Deutscher Verein's Opinion on the draft bill from the German Federal Ministry for Family Affairs, Senior Citizens, Women and Youth and the Federal Ministry of Labour and Social Affairs for a law for better compatibility of family, care and career, NDV 2014, 466 et seq.

family. What is needed here is not just the pure time between care-giver and the recipient of care, but also time for and with a partner as the "core" of the family, personal time and social time, through which families are able to integrate into various social networks.³⁰ A sustainable family policy therefore needs to realize time-related policy measures, alongside financial and infrastructural measures.³¹

d) Minimum income (Principle 14 of the EPSR)

The German Association affirms³² that the goal of the "Europe 2020" strategy of combating poverty should be pursued with increased emphasis. Minimum income schemes make a fundamental contribution to this cause. They can safeguard individuals against social exclusion and empower them to realise their individual potential. This approach is based on respecting the dignity of every individual person and on the fundamental notion of solidarity. The efforts must be directed towards preventing people from falling into poverty in the first place, or to supporting them in their path out of (sometimes long-term) poverty.³³ The German Association endorses the observation from the EESC that in the member states "collective financing and legal safeguards [for minimum income schemes] sometimes need improving"³⁴. Minimum income schemes can and should make a vital contribution to enabling participation³⁵. The financial benefits in minimum income schemes need to create a degree of freedom for those entitled to them which enables them to undertake their own endeavours and activities, with a view to taking up employment³⁶.

In this regard, the German Association welcomes the aspirations of the EU in the EPSR to establish appropriate minimum income systems in the member states and encourages the Federal government, in line with its announcements in the current coalition agreement, to develop a framework for national social assistance systems (Grundsicherungssysteme) in the EU states.³⁷

e) Old age income and pensions (Principle 15 of the EPSR)

A sustainable system of old-age provision contributes to preventing poverty. At the individual level, it serves primarily to secure an income in retirement that allows older people to have a decent standard of living³⁸. In Germany, in the German

- 30 Recommendations by the Deutscher Verein on work-life balance, NDV 2009 513 et seq.
- 31 Recommendations of the Deutscher Verein für öffentliche und private Fürsorge e. V. ((German Association for Public and Private Welfare) regarding the further development of the system of monetary support of families and children. NDV 2019. 449 et seq.
- 32 Opinion of the German Association on the European Pillar of Social Rights, NDV 2018, 64 et seq.
- 33 Deutscher Verein's opinion on the conclusions of the Council of the European Union on common principles for active inclusion, in the interests of more effective combating of poverty, NDV 2009, 304 et seq.; Deutscher Verein's opinion on the European Platform against Poverty and Social Exclusion, NDV 2011, 152 et seq.
- 34 Opinion of the German Association on the European Pillar of Social Rights, NDV 2018, 64 et seq.; Opinion of the German Association for strengthening the social dimension of EU policy establishing effective and reliable welfare provision systems of 15 December 2015, NDV 2016, 63 et seq.
- 35 Opinion of the German Association on the European Pillar of Social Rights, NDV 2018, 64 et seq.
- 36 Recommendations by the Deutscher Verein for further development of minimum income for those seeking employment (SGB II) of 12 September 2017, NDV 2017, 433, 438.
- 37 Expectations of the Deutscher Verein für öffentliche und private Fürsorge e.V. (German Association for Public and Private Welfare) regarding the German government for its Presidency of the Council of the European Union 2020, NDV 2020, 11 et seq.
- 38 Deutscher Verein's Opinion on the European Commission's White Paper "An Agenda for Adequate, Safe and Sustainable Pensions", NDV 2012, 465 et seq.



Association's view³⁹, statutory pension insurance represents the most important pillar in ensuring an appropriate income in retirement. It is supplemented by opportunities for company and private pensions. The German Association took a critical view of the proposal from the Commission under which the statutory retirement age was to be linked to the trend in life expectancy as an automatic measure⁴⁰. It therefore welcomes the fact that the Commission has not taken up this proposal, following submission of the European Pillar of Social Rights.

f) Inclusion of people with disabilities (Principle 17 of the EPSR)

Under the UN Convention of the Rights of Persons with Disabilities (UNCRPD), which both the EU member states and the European Union itself have signed, measures are to be introduced to reinforce the rights of persons with disabilities and to support inclusion. Even if implementation of the UNCRPD presents in some cases major challenges to the signatory states, social welfare provision systems are to be geared to the group of people with disabilities and adapted accordingly in order to guarantee extensive participation⁴¹. The German Association observes that the inclusion of persons with disabilities is an important cross-sectoral task, which needs to be appropriately taken into account when implementing the European Pillar of Social Rights in all 20 policy areas, and particularly in the area of education too⁴². It welcomes the fact that the Commission has announced submission of a strengthened strategy for people with disabilities for 2021, building on the results of the current evaluation of the European Disability Strategy 2010-2020.

g) Long-term care (Principle 18 of the EPSR)

In the spirit of the EPSR, everyone has the right to affordable long-term care services of high quality, in particular home-care and community-based services. In the course of demographic change, the number of people requiring care and support with daily tasks is growing Europe-wide. It is fundamental to guarantee access to care services. In the German Association's view, persons requiring care should be able to live for as long as possible in their familiar/family environment. This requires a guarantee of support in managing daily tasks, with medical and care provision and with social participation. In saying this, the decision regarding the provision of services either in the community or in a care establishment should always be geared to the individual living conditions and needs of the individual person. Community-based care requires framing conditions allowing the care-giver, particularly family members, to undertake that activity. In addition, avoiding or reducing the need for care is of great importance⁴³.

⁴³ Opinion of the German Association on the European Pillar of Social Rights, NDV 2018, 64 et seq.; "Adapt the care system to the social structures! Recommendations by the Deutscher Verein on the further development of care", NDV 2013, 385 et seq.



³⁹ Opinion of the German Association on the European Pillar of Social Rights, NDV 2018, 64 et seq.

⁴⁰ Opinion of the German Association on the European Pillar of Social Rights, NDV 2018, 64 et seq.

⁴¹ Opinion of the German Association on the European Pillar of Social Rights, NDV 2018, 64 et seq.

⁴² Opinion of the German Association on the European Pillar of Social Rights, NDV 2018, 64 et seq.; Recommendations of the German Association: From school support to school assistance in an inclusive school system of 14 December 2016, NDV 2017, 59 et seq.

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Published by:

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