



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR EMPLOYMENT, SOCIAL AFFAIRS AND INCLUSION

The Director-General

Brussels
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Dear Secretary General Skalkos,

I thank you for your letter dated 12/06/2020 addressing “*ESF funding of Roma actions – eligibility issues to consider and resolve*”. I am pleased that Greece is developing an integrated approach to active inclusion of the Roma. In this context, the ESF-funded dedicated Roma branches under the network of Community Centres across the country are a good example. I welcome your efforts to further develop this approach in the new programming period as it yields important results and helps ensuring the necessary coordination of social interventions.

The European Social Fund supports activation pathways through employment, social inclusion, education and health actions, which are particularly important in case of vulnerable groups like marginalised communities including Roma. The latter need a full range of well-coordinated assistance, including access to decent housing, as provided for under national rules and the scope of respective EU Funds.

You are seeking clarifications regarding the eligibility of parts of a set of actions for which you have been in contact with my services in the last two years, at different stages of their preparations. Let me start by the question of rent subsidies for which I need to confirm the approach taken by my services in your discussions. As these are passive measures, they cannot be programmed under ESF rules as stand-alone measures. This matter was already clarified by DG EMPL back in 2015 following your questions to EGESIF.

When assessing the eligibility of expenditure for support under the ESF it should be assessed whether the intervention logic of the action fits within the scope of assistance of the Fund as set out in Article 3 of Regulation (EU) No 1304/2013 (ESF Regulation), i.e. whether the action contributes to the achievement of the specific objectives set out by the Member State for an investment priority and the corresponding thematic objective. The investment priorities have to be interpreted in line with the mission of the ESF as set out by Article 162 (TFEU).

Rent subsidies can therefore only be included for ESF support, on an exceptional basis and as part of the same operation, if they constitute a precondition for the success of an activation component of an operation i.e. any such support on accommodation should be

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anchored in substantial labour market activation measures, training and/or social inclusion accompanying measures.

I take good note of the activation criteria set for granting such rent subsidies, of the monitoring procedure for the inclusion process based on personalised inclusion plans and of the fact the Roma branches established in the Community Centres are closely associated. Still, I invite you to look into how this part of the Roma actions can be developed to include a stronger element of activation into the labour market, education, training and/or social accompanying measures.

Should you decide to proceed with including an element of rent subsidies within a bigger ESF eligible action comprising active measures, it is important that it would be linked and complementary with other support schemes such as the housing benefit that has been activated in Greece in 2019. In case the pilot proves successful and calls for scaling up the approach in the next programming period, it will still be important to explore the right synergies across funds. For example, the ERDF can play an important role in housing beyond infrastructure as laid down under Article 2 of the proposal for ERDF for 2021-2027 (COM(2018) 372 final), which refers under Policy Objective 4 to *“increasing the socioeconomic integration of marginalised communities [...] through integrated measures, including housing and social services”*.

With regard to the “management units for transitory relocation” and “improving living conditions”, I consider that as they stand both operations are mainly infrastructure operations and therefore not eligible for support by the ESF, with the exception of the health advisors element in the action “improving living conditions”. We have noted that you intend to make use of Article 98(2) CPR by which the ESF may provide support to part of an operation on the basis of the rules applicable to the ERDF, bearing in mind that the use of this provision is limited to 10% for each priority axis. Regarding the intention to offer job placements to members of the Roma community for purposes of mediation and other maintenance work to accompany the successful relocation of families in local communities, one might consider other formulas in line with the ESF such as public work schemes.

To conclude, I take good note of your clarifications about the Roma actions, developed as a pilot in view of possible continuation in the next programming period. I strongly encourage you to develop an integrated approach exploring all options for synergies between funds. My services remain available to assist you. The EU Framework for National Roma Integration Strategies promotes such an integrated and holistic approach. The ESF and the ESF+ have an important role to play but remain only one of potential funding sources and cannot be used to replace other instruments within their specific scope, such as the ERDF.

Yours faithfully,



Joost KORTE