

## EUROCHILD MEMBERS FEEDBACK ON NATIONAL RECOVERY AND RESILIENCE PLANS

12 May 2021

Summary of feedback	
Total number of responses	22
From the following countries	Belgium, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Finland, France, Germany, Hungary, Lithuania, Portugal, Romania, Slovakia, Slovenia, Spain
Number of members consulted on the RRP process in their country	3
Do the NRRPs include measures on children	NO: 1 YES, but it a tokenistic manner: 3 YES, but they are insufficient: 10 YES, they are sufficiently included: 4 YES, in a comprehensive and robust manner: 1 Other: 3

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## BELGIUM

### KEKI, CHILDREN'S RIGHTS KNOWLEDGE CENTRE

#### 1. Were you consulted in the drafting of your national recovery and resilience plan?

- NO

#### 2. Are measures on children included in your national recovery and resilience plan?

- YES, but they are insufficient

#### 3. Are there any red flags you would like to raise (unacceptable parts of the plan that you believe should not be included in the plan)?

- NO

#### 4. Is there anything else you would like to share with us regarding your country's plan?

- Child participation is not included in the implementation and evaluation of the plan
- The majority of the measures concern children and young people indirectly, moreover, it is not specified how children and young people will be involved and targeted in its implementation
- The plan is lacking a consistent monitoring and evaluation system
- The plan is lacking an investment in partnership and collaboration between government, civic society, non-profit organisations and researchers
- The plan does not focus enough on the social inclusion investments. It does not specify how will it impact the wellbeing of children and youth, how will it decrease/fight poverty, and how will it improve the situation for the most vulnerable children in Belgium
- The plan doesn't take into account the important findings from researches that clearly show the detrimental impact that COVID-19 is having on children and young people

#### 5. More specific comments on the plan

At least 78% of the population aged between 20 and 64 should have a job by 2030. To achieve this, the EU should aim to at least halve the gender gap in employment, **increase the provision of formal education and care for young children**, and reduce the proportion of young people aged 15-29 who are neither in employment nor in education or training (NEET) from 12.6% (2019) to 9%.

#### AXIS 2: DIGITAL TRANSFORMATION

*Project Digitalizing ONE (Government of the French Community)*

*The project aims to contribute to the digital transformation of the **Office de la Naissance et de l'Enfance** (the ONE), the public reference institution in the Wallonia-Brussels federation for everything related to **childhood**,*

**children's policy, protection of mothers and children, medico-social assistance to mothers and (future) children, care for children outside their home, etc.** The objective is to develop the digital transformation and management of ONE, aimed at administrative simplification and user-friendliness. ONE has been undergoing a major digital transformation for several years. The objective is to continue and accelerate this transformation by using the numerous possibilities offered by IT to improve the services and information provided to families, but also to partners (reception, training providers, etc.). partners (reception centres, training providers, organising bodies, preventive medicine, particularly in schools, etc.). medicine, particularly in schools, and other stakeholders), while at the same time strengthening at the same time strengthen the management capacity.

This will be done by setting up an integrated digital environment that facilitates contact with the different structures and families, by developing new services and tools for users and professionals in the field of childhood and health, by digitising processes (internal and/or mixed) and also by collecting, enriching, processing and sharing data (Open Data) and the management of the institution and/or policies related to children. The programme **includes the monitoring of policies relating to children, the use of services and applications through the collection and processing of data, which are systematically analysed to adjust policy and analysed in order to adjust policies and investments and measure their effectiveness** (feedback loop principle).

Comment: There is no mentioning of how the impact on children will be monitored or evaluated. It is also not clear how children will be involved in the digital transformation process.

### AXIS 3: MOBILITY

*Rail - accessible and multimodal stations*

*The accessibility of the reception facilities for all people, especially for persons with reduced mobility (persons with permanent or temporary disabilities, families with children, travellers with suitcases...) is a key element in the development of the train in Belgium.*

Comment: There is no mentioning of youth. Mobility is very important for young people because, among other things, it has an impact on their freedom and their social life. It is also not clear how children with permanent or temporary disabilities will be involved to make the railway stations more accessible.

### AXIS 4: PEOPLE AND SOCIETY

*Digisprong (Flemish government)*

*- Pillar 1: **Reforms in education with regard to ICT, media literacy and computational thinking***

*The Flemish government attaches great importance to the acquisition of the necessary ICT skills. In recent years, a great deal of work has been done in the area of reforming training with regard to ICT literacy. In secondary education, this led to the introduction of new ICT levels to be attained in the first grade based on the European DigComp reference framework. In February 2021, the Flemish Parliament approved similar reforms for the second and third grades. The new approved reform also strives for inclusiveness, with the aim of ensuring that ensure that every student has the necessary digital skills for his or her personal development and future participation in the labour market.*

*- Pillar 2: **Promoting effective ICT school policies***

*Digitalisation can only be effective if it is embedded in a clear educational vision. The corona crisis demonstrated that the current ICT framework is not well suited to successfully meeting today's challenges. This measure is intended to strengthen the role of ICT coordinators and to provide concrete guidelines and templates with which a sound ICT policy plan can be drawn up.*

*- Pillar 3: Digital competence of teachers and teacher trainers*

*Teachers should, under the guidance of a specialised digitally experienced school staff to further develop their own ICT skills. This large-scale operation can only succeed if members of the school team have the right ICT knowledge, skills and reflexes in their pedagogical and didactic assignments within the school context and in their own professional development.*

*We want to achieve this objective by organising pilot projects in initial teacher training that focus on digital skills. These projects will be financed outside the framework of the EU Ferro fund, but are an integral part of the broader EU Ferro Network. an integral part of the broader Digisprong investment and reform package.*

*- Pillar 4: Establishing a knowledge and advice centre to support schools with the digitisation of their educational offerings.*

Comment: We suggest to read the opinion provided from VLOR [here](#). VLOR welcomes the major investment in ICT, but is very concerned about its sustainable embedding in Flemish education. The council misses a recurring budgetary story for pupils, organisation and staff. Digital infrastructure needs permanent maintenance and, after a while, also replacement. It is currently unclear whether structural resources will be made available for this in the future. The Digisprong has large and complex digital ecosystems at schools. High-performance digitisation requires permanent investments in digital infrastructure, hardware, maintenance, expertise, training and information security, as well as in the broader school infrastructure. This requires a certain flexibility in use of resources. Digitisation in education also requires permanent investments in software and digital learning resources, which today are often offered via rental licences. The same applies to the evolution towards cloud computing. That requires ongoing investment, year after year.

What applies to infrastructure and software also applies to increasing the competence of teachers. The market for digital teaching aids and learning platforms is in motion and constantly innovating. Continuing professionalization is therefore a necessity.

The fact that the government invests in hardware for pupils is a fine and necessary step necessary step to monitor equal educational opportunities, but it is insufficient. There is a need for flanking policy initiatives to avoid a digital and social divide. The VLOR reiterates its recommendations:

- Publish an equal opportunities impact report when it comes to digitalisation and monitor the right to education for all;
- Take into account the recommendation of the e-Inclusion Taskforce, the collaboration between local administrations, public institutions and civil society organisations, which has been working for years on the digital inclusion of vulnerable groups
- Pay extra attention to vulnerable parents. If they are not sufficiently digitally literate, they cannot support their children with homework in a digital form, they cannot communicate with the school via the online platforms used for that purpose, etc.
- Have attention for internet connectivity and basic digital infrastructure in vulnerable families. In the corona crisis, a solution to this problem was found via the telecom providers, among others.

*PERSONAL ASSISTANCE IN COMPULSORY EDUCATION (GOVERNMENT OF THE WALLONIA-BRUSSELS FEDERATION)*

*The overall objective of the project is to respond in secondary schools to the psychosocial, educational and pedagogical problems of pupils and to counteract the spread of the phenomena of disadvantage and school drop-out by offering differentiated learning and personalised support programmes.*

Comment: Maldonado, J. E. & De Witte, K. The effect of School Closures on Standardised Student Test Outcomes, 2020 Working paper Department of Economics KU Leuven.

This study investigates whether and to what extent distance learning during the lockdown in spring of 2020 has led to learning disadvantages among pupils in primary education.

**Significant learning losses due to school closure:** the study identifies a significant learning disadvantage resulting from the closure of schools. The learning deficit corresponds to six months of schooling. The learning losses are greater for Dutch than for mathematics. It is suggested that distance learning are easier to organise for mathematics than for Dutch. Learning losses are also observed for French, Science & Technology. No differences are noted for People & Society. These learning losses can in the long run lead to lower wages and a higher chance of a higher risk of unemployment.

**Increased inequality between and within schools:** the inequality in test scores within and between schools also increased, both for Dutch and for mathematics, as a result of the COVID-19 crisis. Because schools themselves were for the organisation of distance learning, large differences in approach arose between schools. The disparity within the schools can partly be explained by the fact that schools could not reach all pupils.

For example, primary schools in Antwerp could not reach up to a third of the pupils initially. Another cause for this disparity is that several children did not have a laptop to do their schoolwork, 1 out of 10 did not have an Internet connection at home and more than 1 in 10 did not have a quiet place to work at home. The learning losses and inequalities increase in schools with more students from lower socio-economic groups, in urbanised areas and with lower test scores in the fourth grade.

**There is no project mentioned in Flanders, whilst this study shows a big impact of COVID-19 in the region. Moreover, how were children and youth involved in formulating different objectives and levels?**

#### (RE)QUALIFICATION STRATEGY

*There continues to be great inequality in the economy and employment in the Brussels Region. The Brussels-Capital Region is confronted with major socio-economic inequalities on its territory, which translate into high unemployment among certain groups of the population: in 2019, unemployment among young people (14-24 years old), low-skilled people and non-EU nationals was 2 to 2.5 times higher than the Brussels average (~29%, ~25% and ~25% respectively, compared to an average of ~13%).*

Comment: There seems to be no mention of targets specifically oriented towards children and young people.

## **6. Additional Information from the organisation**

KeKi's [COVID-19 Report](#), available in Dutch

### 1. Findings:

- **Public space:** In several surveys, young people indicated that they did not go out for recreation because there is no (safe) public space for meeting friends outside that is adapted to their age (e.g. playgrounds for children). Children and young people also say that they do not go out much for recreation because they are afraid of negative comments from others and of fines (police). Children and young people who live in an urban environment, in an apartment building and/or in a house without a garden or terrace have a greater need for public space. In small dwellings, tensions were also often higher (i.e. there was a greater need to go outside).

- **Taking into account the impact on the diversity of families:** families in vulnerable situations (single parents, unemployed parents, families in need of care...) were more affected by the COVID-19 measures. They have fewer options financially but are also often more worried (about social isolation, contagion, finances, the future...). Many of the corona-measures focused mainly on middle-class families, and did not take sufficient account of the diversity of families. An example from Unia's report: in 2020, some sports were allowed again, including kayaking and tennis. These are not sports that everyone can participate in.
- **Children and young people in vulnerable situations are less easy to reach:** both by youth workers and local authorities, but also for research. Their perspective is often not sufficiently known and considered. Think of: children and young people with a disability, refugees, children and young people with a migration background, children and young people who do not live at home (anymore)...
- **Well-being:** Major impact on well-being. Some surveys show that it is often still taboo to call for help (only when it is very serious). The SIGMA-study also shows that mental well-being is strongly linked to social well-being. Contact with family, friends and peers is very important for the mental well-being of young people.
- **Participation:** Children and young people often feel that they are not listened to by policy makers. They also often did not get a say in the rules at home.
- **Positive impact of social media:** informing young people who are anxious (with an indirect impact on young people's happiness) + increasing young people's happiness by using humorous content on social media.

Keki's [Study and policy advice on COVID-19](#), available in English

## BULGARIA

### FOR OUR CHILDREN FOUNDATION

Review from Early childhood development perspective

#### 1. Were you consulted in the drafting of your national recovery and resilience plan?

➤ YES

There was a consultation on the draft plan in October-November 2020. The National Network for Children submitted a statement with suggestions. These have however not been taken into account in any form in the revised version of the plan. To our knowledge, the revised version has not been subject to any consultation.

## 2. Are measures on children included in your national recovery and resilience plan?

- YES, but they are insufficient.

### **Any other comments:**

The only measures involving children are in the area of education. The plan includes a measure to renovate some of the existing education infrastructure, build new ECEC settings and new Centres for Personal Development (aimed at building the skills of students and youth).

There are no measures related to children in any other area, despite the huge impact the COVID pandemic has had on children and families.

## 3. Does the plan include any targets or milestones concerning children?

The only targets are related to the building of infrastructure - there are no targets directly concerning children, even in terms of the impact of this infrastructure on them.

## 4. Are there any red flags you would like to raise (unacceptable parts of the plan that you believe should not be included in the plan)?

- YES

YES - the plan consists almost entirely of measures that would have been undertaken regardless of the plan - at least in the health, social and education spheres. For example, the building of the Centres for Personal Development is something the state has to do anyway, as it is part of the new Law on Preschool and School Education. In the social sphere, they have included measures such as "adopt new quality standards for social services" - which is something they are already required to do as part of the regulatory framework under the new Social Services Act; these standards have been in the making even before the pandemic. There is no point in such things being included in the plan. **It seems that all the plan does is funnel the new funding towards existing projects and measures, without undertaking any actual reforms, and without any clarity on what the impact of these would be in terms of the pandemic recovery.**

## 5. Is there anything else you would like to share with us regarding your country's plan?

There is no connection between the sections of the plan describing the challenges in Bulgaria and the measures to address these challenges.

For example, the plan describes as challenges "the lack of a holistic approach to early childhood development", as well as some problems in the education system, but there are no measures in the plan to address them. We would describe this plan as another missed opportunity to do something to address the widespread child poverty, social exclusion and violations of child rights in Bulgaria.

## CROATIA

### FICE CROATIA

#### 1. Were you consulted in the drafting of your national recovery and resilience plan?

- NO

#### 2. Are measures on children included in your national recovery and resilience plan?

- YES, but they are insufficient

#### 3. Does the plan include any targets or milestones concerning children?

The plan does not contain a specific section on children. Children are included in different sections and policies of other components of the plan, e.g. the ones dedicated to education and social protection.

#### If yes, can you list the objectives below and give a brief comment on each of them?

##### *Educational component:*

1. Equal opportunities for all children and their inclusion in the education system from the earliest age and an increase in the coverage of older children from 3 years to the year of starting school - participating in early and preschool programs upbringing and education.
2. Increased level of basic literacy from early preschool education up to high school, which creates the preconditions for better mobility towards higher education, to which an increased number of mandatory ones will contribute teaching hours in primary school and increasing the share of high school students enrolled in high school programs.

Comment: The goals were well formulated and targeted at children, but they could have been more specific around certain groups of vulnerable children such as children with disabilities.

##### *The goals within the component that includes social protection are:*

1. Secured employment of 150 new experts for provision of non-institutional services, education and licensing of heads of family law measures protection and immediate guardians thus being directly affects the prevention of institutionalization.

Comment: The goal is to promote and develop deinstitutionalization, which is certainly good for children and young people in alternative care, but it could be more specific in mentioning the area of alternative care for children and its relative goals.

2. Guaranteed minimum standards ensured the most vulnerable members of society thus being affected to reduce poverty and social exclusion.



Comment: This goal is certainly needed in every society but it is in itself insufficient and needs to be well worked out to be applicable and achievable.

**4. Are there any red flags you would like to raise (unacceptable parts of the plan that you believe should not be included in the plan)?**

- NO

**5. Is there anything else you would like to share with us regarding your country's plan?**

Policies and measures focused on investing in children could have been more specific and concrete. The goals should have been focused on the welfare of children, rather than covered in other areas.

**OMBUDSPERSON FOR CHILDREN CROATIA**

**1. Were you consulted in the drafting of your national recovery and resilience plan?**

- NO

**2. Are measures on children included in your national recovery and resilience plan?**

- YES, but they are insufficient

**3. Does the plan include any targets or milestones concerning children?**

In the field of education – the NRRP announces the construction, extension, reconstruction and equipping of preschool institutions, primary schools and secondary schools, increasing the capacity of the early childhood education and care, transition to one-shift work of primary schools and introduction of full-time teaching in primary schools, improving vocational education in secondary schools, increasing inclusion of children marginalized in all levels of education, etc. The reform of the education system is necessary and urgent.

In the field of social welfare – NRRP announces the improvement of the system of social benefits and services, strengthening the capacity of experts, etc. The current major problems in the social welfare system require an urgent and comprehensive reform, which has been announced for years but without being followed by a real implementation.

The NRRP announces changes in the field of justice related to children. Judicial reform is necessary, but Croatia should set up specialized family courts to deal with all child protection cases, with specialized judges and professional associates working there.

**4. Are there any red flags you would like to raise (unacceptable parts of the plan that you believe should not be included in the plan)?**

- NO

#### **5. Is there anything else you would like to share with us regarding your country's plan?**

There are major problems in Croatia affecting children's rights, resulting from unemployment of family members, poverty, inaccessible preschool education, poor education system, health, social welfare, judicial protection, inadequate care for children with disabilities, children with a lower socioeconomic status, Roma children, children in alternative care, insufficient capacity of social care centers, etc.

The NRRP has offered certain solutions to these issues, but without improving what had already been proposed by pre-existing documents. At this stage, it is not possible to predict the quality of these solutions.

145.000 children in Croatia are at risk of poverty and social exclusion, i.e. 20% of all children. They achieve poorer educational outcomes, often drop out of education and continue the cycle of family poverty. The NRRP announces a new social service for adults (social mentoring) but does not do so for children. There is no (non-monetary) assistance for such children in the social welfare or education system in Croatia.

The NRRP does not envisage improvements and investments in providing housing for families with children of lower socioeconomic status who are not able to provide housing for themselves (social housing, city or state housing).

The NRRP does not include investments and improvement of services related to the mental health of children, youth and families.

## CYPRUS

### PANCYPRIAN COORDINATING COMMITTEE FOR THE PROTECTION AND WELFARE OF CHILDREN

At the time of writing, the NRRPs is not available yet.

It has been said that the Government plans to allocate the vast majority of this fund to the "green transition" and only around 2% to reinforcing the Health Care System.

We are afraid that the NRRP will not prioritise social issues and tackling poverty nor child poverty. One could argue that job creation will improve living conditions and the standard of living, including of children, but unless we see specific, targeted and sustainable actions towards tackling social issues, we will fail to build a more social Europe and tackle child poverty.

## CZECHIA

### ALLIANCE FOR THE RIGHTS OF THE CHILD

#### 1. Were you consulted in the drafting of your national recovery and resilience plan?

- NO

#### 2. Are measures on children included in your national recovery and resilience plan?

- YES, but they are insufficient

#### **Any other comments:**

Almost all measures are focused only on families with children, and not on all children. Example: measures to enhance employment of mothers with young children through expanding of pre-school facilities.

There are some measures in healthcare and education, such as the prevention of exclusion due to the "digital gap".

#### 3. Does the plan include any targets or milestones concerning children?

Not really, just amounts of allocated funds.

#### 4. Are there any red flags you would like to raise (unacceptable parts of the plan that you believe should not be included in the plan)?

- NO

## DENMARK

### JOINT COUNCIL FOR CHILD ISSUES IN DENMARK

#### 1. Were you consulted in the drafting of your national recovery and resilience plan?

- NO

#### 2. Are measures on children included in your national recovery and resilience plan?

- YES, but in a tokenistic manner

#### **Any other comments:**

The plan includes only measures already taken or planned.

The Minister of Employment has recently said that the government will not proceed with the abolition of the benefit ceiling, which is the main factor that has raised child poverty in Denmark.

Furthermore, no actual plan for a poverty threshold has been set up.

The Benefit Commission is to put forward its recommendations for the government by the end of May – again, this is a measure already taken and not a reaction to the pandemic.

The “Children First” initiative put forward in January 2021 is highly criticised by NGOs and have not yet reached its final form due to political disagreement. The plan includes many improvements for children in alternative care, but is unfortunately problematic under many points of view.

In sum, measures on children are included in the plan, but not as possible recovery initiatives from the pandemic – only plans already made regarding vulnerable children are mentioned.

**3. Are there any red flags you would like to raise (unacceptable parts of the plan that you believe should not be included in the plan)?**

- No, not regarding children in vulnerable positions besides the aforementioned possible issues in the “Children First” initiative.

**5. Is there anything else you would like to share with us regarding your country’s plan?**

It is puzzling that the government makes arguments from initiatives already taken which have nothing to do with recovering from the pandemic.

Children in vulnerable positions need investing in their learning and their families’ economies due to a very long period of lock-down. These crucial questions are not addressed in the plan.

## FINLAND

**CENTRAL UNION FOR CHILD WELFARE FINLAND**

**1. Were you consulted in the drafting of your national recovery and resilience plan?**

- NO

**2. Are measures on children included in your national recovery and resilience plan?**

- NO

***Any other comments:***

Children and young people are mentioned throughout the plan, but the document does not propose any measures to tackle the mentioned problems.

**3. Does the plan include any targets or milestones concerning children?**

- NO

**4. Are there any red flags you would like to raise (unacceptable parts of the plan that you believe should not be included in the plan)?**

➤ NO

**5. Is there anything else you would like to share with us regarding your country's plan?**

Young people have been severely hit by the corona crisis; the plans should thus set up measures to support them, e.g. in the field of mental health.

It is important to pay attention to the importance of reconciling work- and family- life.

**FRANCE**

[NEXEM](#)

**1. Were you consulted in the drafting of your national recovery and resilience plan?**

➤ NO

**2. Are measures on children included in your national recovery and resilience plan?**

➤ YES, but they are insufficient

***Any other comments:***

The plan is mainly focused on the access to the labour market with an effort consisting in incentives for apprenticeships and orientation where more workforce is needed.

Concerning younger children, the plan focuses on the first 1000 days of life, with a working group that will propose recommendations on health, life paths, child care. Yet, it fails to explain what will be the concrete follow up of the report and the means that will be provided.

**3. Is there anything else you would like to share with us regarding your country's plan?**

The plan contains very few measures on social issues, and no tool to respond to the social crises caused by the Covid crisis.

The plan doesn't take the funding opportunities that the EU provides to answer the urgent necessities in terms of child protection, e.g. the problematic of children that are left without support because they just reached the age of 18 (almost 1 out of 4 become homeless).

This sector - as many social services – is facing serious staff shortages. Measures in favour of the healthcare workers have been taken (Ségur de la Santé) but workers supporting children are not in the scope of these measures.

[LA FÉDÉRATION DES ASSOCIATIONS DE PROTECTION DE L'ENFANT \(CNAPE\)](#)

**1. Were you consulted in the drafting of your national recovery and resilience plan?**

- NO

**2. Are measures on children included in your national recovery and resilience plan?**

- YES, but they are insufficient

**Any other comments:**

All measures relating to children concern the professional integration of young people and equal opportunities. There is a very small section on early childhood (access to childcare).

The plan does not include anything for the most vulnerable children, such as protected or disabled children, in a situation of poverty etc.

**3. Does the plan include any targets or milestones concerning children?**

There are no concrete targets for children. The only objectives mentioned are those for employment and training.

**4. Are there any red flags you would like to raise (unacceptable parts of the plan that you believe should not be included in the plan)?**

- NO

**5. Is there anything else you would like to share with us regarding your country's plan?**

During the COVID crisis, children were left behind. This NRRP confirms this trend; the priorities are mainly pertaining to the fields of employment and equal opportunities. Albeit they represent one of the most vulnerable section of society, children seem to be forgotten.

**REVIEW FROM EARLY CHILDHOOD DEVELOPMENT PERSPECTIVE**

**1. Were you consulted in the drafting of your national recovery and resilience plan?**

- YES (*we would say YES, though we were only advised/informed, without any further expectations*)

The Inter-ministerial Delegation against Poverty and Ministry of Health and Solidarity shared the draft NRRP, which includes the specifications of the 1000-day Houses Plan to nourish the pathway for beneficiaries.

**2. Are measures on children included in your national recovery and resilience plan?**

- YES, but in a tokenistic manner

**Any other comments:**

- Key elements such as fight against social inequities and social exclusion as well as equal opportunities are being widely addressed in the French NRRP. Yet, they are being tackled mostly from a perspective of youth employment and school academic knowledge. This shows, on one hand, that there are still strong investments in development when it is often too late to provide great value and on the other hand that **there is still little understanding that the highest rate of economic returns comes from the earliest investments in children, leading to greater productivity and reduce social spending for society.**
- **There is little mention of the very early years.** The Plan reveals the First 1000 days' expert committee and plan, with one red flag to be implemented and embedded into the 2021 social security scheme: extended paternity leave. Although all other key components of the Plan are being provided with detailed implementation and financing measures, this specific measure is being included in a tokenistic manner in the overall document. This is confirmed by the lack of mention of early childhood in any other part of the document, nor in the "France Relance" plan – released in Sept 2020 as the strategic 2030 roadmap for economic, social and ecological rebuilding - as the foundation of this NRRP. According to the NRRP, France is far from considering Early Childhood as the cornerstone of recovery, nor of long-term economic growth, going against the European dynamics of the European Child Guarantee and the EU Strategy on the Rights of the Child. Instead, **early childhood is regrettably still being considered as a cost service that support and foster parents' employment, rather than as a quality investment for the youngest citizens and future generations of the society.**

### 3. Does the plan include any targets or milestones concerning children?

We recognize that the NRRP for France does address the next generation, it **does include targets concerning children**. Yet, this is rather a **short-term vision** not considering a holistic approach of the "next generations", by leaving little room for a long-term vision that considers very young generations. As explicitly mentioned under one of the 9 components "Policies for the next generation, children and youth, including education and skills" under the pillar of "Social and territorial cohesion", France affirms its choice to invest massively in favour of youth.

As part of the civil society working on the very early years, we consider that Early Childhood should be more heavily anchored in NRRP, not only in continuity of previous strategic documents such as the Country Specific Recommendations provided in May 2020, but also in anticipation of all future European plans, such as the European Child Guarantee, the EU Strategy for the Rights of the Child and the recently released ECEC Toolkit for inclusion in line with Principle 11 of the European Pillar of Social Rights, recognizing children's rights from the very early years and breaking the cycle of disadvantage as early as possible.

If yes, can you list the target(s) below and provide a short comment on each?

- To facilitate employment entries for young
- To support young far from employment

- To support the most vulnerable – those with disabilities - young towards employment
- To reduce class size from CP and CE1 levels in priority education networks (“Réseaux d’Education prioritaire”)
- To open places in collective daycare centers within the frame of the National Poverty strategy
- To guarantee access for all children above 3 years old (compulsory school)
- To accompany children in high schools to access university level
- To upgrade training of professionals and transform education work within the Ministry of Education (3 years old and beyond)
- To extend paternity leave as part of the First 1000 days pathway for families
- To develop Internats d’Excellence boarding schools
- To create 40 new “Cités Educatives” in order to reinforce local cohesion and mobilization towards the pathway of children and young from 0 to 25 years (as part of the follow up of the CSR (“RPP2 2020”) that shall offset the adverse effects of the COVID-19 crisis)
- To recognize the 1000 days Houses as one of the first steps to identify vulnerability factors and a no request from families

Overall, we recognize the urgency to address the needs of young, but our nation needs to take an ambition of a long-term perspective, considering the very early years – much earlier than school - as a winning bet for the future by giving all opportunities to unleash their full potential, regardless of their social origins and to ultimately lead to academic success with higher opportunities for employment. This would ultimately need more social investments with joint efforts from European and National funds. Quality early childhood development being the first step on the lifelong learning ladder, measures outlined above in the NRRP are insufficient.

**4. Are there any red flags you would like to raise (unacceptable parts of the plan that you believe should not be included in the plan)?**

NO



### 5. Is there anything else you would like to share with us regarding your country's plan?

In addition to the above-mentioned points about the French NRRP, we would like to emphasize on those points outlined also in the Plan:

**Reinforcement of impact evaluations:** such impact evaluation will be evaluating public spending on its impact on social inclusion – it would be expected that its purpose to improve quality and efficiency of public spending in Early Childhood and Parenting support will help to support adjustments needed for all public policies involving the early years.

**The NRRP ambition towards equal opportunities** is to grant equal access to public employment by improving success in competition exams for public service (“Classes préparatoires Intégrées”). This actually is a very restricted lens of giving equal opportunities to children and young.

**Bold measures have been taken in the NRRP to enhance training of young people and to invest in skills.** It is important to outline that such training and skills improvement need to consider all different areas of training, i.e. those willing to take the path to work as future Early Childhood and Parenting professionals. While in-service training is being addressed through the recently released National Plan to improve professionals’ skills, such measures embedded in the NRRP would address pre-service training for young who will become future professionals.

## GERMANY

### NATIONAL COALITION GERMANY NETWORK FOR THE IMPLEMENTATION OF THE UN CONVENTION ON THE RIGHTS OF THE CHILD

#### 1. Were you consulted in the drafting of your national recovery and resilience plan?

- NO

#### 2. Are measures on children included in your national recovery and resilience plan?

- YES, but they are insufficient

#### **Any other comments:**

The plan develops the following targets concerning children:

3.1. Digitalisation of education

4.1. Investment program on early childcare; support of students with pandemic-related learning gaps

### 3. Does the plan include any targets or milestones concerning children?

Launch of a digital learning platform already in 2021; full development 2022-2025

- Target of 90.000 additional childcare spots (financial means to be disbursed until December 2022)
- Up to 25% of approx. 11 million children in Germany could get an offer for tutoring/additional education to target education gaps caused by the pandemic; the exact number is based on the identified needs (the states should receive the financial means until Q2 2022)
- The stakeholder consultation included teachers, tutors, and civil society but not children themselves

Comment: Since education and childcare are the exclusive responsibility of the Bundesländer, the implementation of the measures cannot fully be determined on the federal level.

### 4. Are there any red flags you would like to raise (unacceptable parts of the plan that you believe should not be included in the plan)?

- NO

### 5. Is there anything else you would like to share with us regarding your country's plan?

Civil society as a whole, particularly children and young people, were not consulted in drawing up the plan. Important sector such as administration and the health do not address children specifically. Health services for children were already deficient before the pandemic and should now be addressed, for example Long-Covid in children.

Regarding the digitalisation of education, an already existing plan called DigitalPaktSchule is mentioned. This plan should now be bolstered by additional funds from the NRRP. Given the already existing problems of DigitalPaktSchule – more than 80 percent of the funds not having been used – it is not clear how additional funds would help this bottleneck. In addition, investing in hardware for teachers now raises the question of sustainability once this hardware is outdated.

It is particularly glaring that there are no measures supporting the non-formal education sector. Children are not merely students, their life includes sports, arts and communal activities. These are completely left out in NRRP, in stark contrast to Art. 31 UNCRC.

## DEUTSCHES KINDERHILFSWERK E.V.

### 1. Were you consulted in the drafting of your national recovery and resilience plan?

- NO

### 2. Are measures on children included in your national recovery and resilience plan?

- YES, but they are insufficient

#### ***Any other comments:***

The plan develops the following targets concerning children:

3.1. Digitalisation of education

4.1. Investment program on childcare; support of pupils with pandemic-related learning gaps

**3. Are there any red flags you would like to raise (unacceptable parts of the plan that you believe should not be included in the plan)?**

NO

**4. Is there anything else you would like to share with us regarding your country's plan?**

We welcome the initiatives to digitalise education in Germany and to provide additional funding to close education gaps among students, which were caused by the pandemic. However, we do not believe that the provided funds will suffice to meet the needs of the children.

Furthermore, the plan does not include measures to support the non-formal education sector, disregarding the importance of non-formal education for children's lives.

Even though the plan aims to strengthen some social policies, it does not address child poverty in particular. Already before the pandemic, every fifth child in Germany was affected by poverty.

Lastly, civil society as a whole and children and young people in particular were not given the opportunity to participate in the drafting of the plan and child participation is not defined as an objective for the implementation of the proposed measures.

### BAYERISCHER JUGENDRING K.D.Ö.R. ( BAVARIAN YOUTH COUNCIL)

**1. Were you consulted in the drafting of your national recovery and resilience plan?**

➤ NO

**2. Are measures on children included in your national recovery and resilience plan?**

➤ YES, they are sufficiently included

***Any other comments:***

The planned measures on children and youth are quite broad and range from the digitalisation of education and supporting schoolchildren with pandemic-related learning backlogs to securing apprenticeship positions and reducing youth unemployment.

**3. Does the plan include any targets or milestones concerning children?**

- Digitalising education

The supplementary agreement for teachers' laptops came into force on January 28, 2021. The funds for procurements are available immediately, the procurements should be settled by the end of 2021.

- Increasing the amount of childcare facilities

The program only supports the renovation of facilities. The funding period started in January 2020 and will end in June 2022. The target value of additional childcare places was set at 90,000.

- Securing apprenticeship positions

The quantitative goal of the federal program is to keep the number of newly concluded apprenticeship contracts at the same level as in the years before the corona pandemic.

- Supporting schoolchildren with pandemic-related learning backlogs

With the initiative, up to 25% of the roughly eleven million schoolchildren in Germany could be offered learning support.

The Recovery Plan lists concrete targets and milestones. Some programs are, however, lacking a strategy for the future as the programs already started in 2020.

Additionally, all the measures focus on schools and schoolchildren. Non-formal education does not play any role. The recovery plan only refers to another government program to strengthen early childhood education, to promote summer camps and activities in the field of non-formal education.

**4. Are there any red flags you would like to raise (unacceptable parts of the plan that you believe should not be included in the plan)?**

➤ NO

## HUNGARY

**OFFICE OF THE COMMISSIONER FOR FUNDAMENTAL RIGHTS, HUNGARIAN OMBUDSMAN**

**1. Were you consulted in the drafting of your national recovery and resilience plan?**

➤ NO

**2. Are measures on children included in your national recovery and resilience plan?**

➤ YES, they are sufficiently included

***Any other comments:***

Of the 9 components identified, two – the Demography and Public Education and the Renewal of universities components – focus on children and their right to quality education, but some of the other components - for example the Digitalisation reform for competitiveness component - also serve the interests of children.

**3. Does the plan include any targets or milestones concerning children?**

In the Demography and Public Education component, the aim is to increase the desire to have children, which is to be promoted through family, tax and health policy instruments. To this end, for example, the aim is to create as many crèche places as possible close to children's place of living. In addition to the establishment of institutions, the training and retraining of highly qualified professionals is needed, as caring for children under

three has a significant impact on a child's life path. With regard to public education, the aim is to ensure not only the education of children, but also quality education. This goal requires the modernization of public education institutions, increasing digital equipment in the institutions, and ensuring that all children have equal access to them. Increasing the digital competencies of teachers is also essential. All this can increase the inclusiveness of education, the enforcement of the right to quality education, and the reduction of inequalities resulting from disadvantage.

In the Catching-up municipalities component, one of the aims is to improve teachers' professional development and improve their equipment as well, which promotes the right to education. Another significant goal is to increase support for pregnancy and the first 1000 days, to promote the proper development of children through all educational, social, health and housing elements, thus promoting equal opportunities.

The Digitalisation reform for competitiveness component also plays a role in equalizing opportunities. During the development of broadband networks, these services can also reach households – and students – located in disadvantaged settlements.

**4. Are there any red flags you would like to raise (unacceptable parts of the plan that you believe should not be included in the plan)?**

- NO

**5. Is there anything else you would like to share with us regarding your country's plan?**

Many of the elements and goals of Hungary's NRRP promote children's rights, from ensuring the child's birth to entering the labour market by ensuring access to quality education and reducing social inequalities.

## LITHUANIA

VŠJ AUTO MOTO GROUP

**1. Were you consulted in the drafting of your national recovery and resilience plan?**

- NO

**2. Are measures on children included in your national recovery and resilience plan?**

- YES, they are sufficiently included

**3. Does the plan include any targets or milestones concerning children?**

1. The plan promotes health preservation and promotion activities and strengthen psychological (emotional) societal resilience to reduce suicide, addictions, with a strong focus on the psychological state of children. Include them into physical activities. It also introduces new service - psychosocial rehabilitation of children and adolescents, provided by a team of specialists: doctor child and adolescent psychiatrist, medical psychologist, social worker, mental a health nurse and, if necessary, a specialist in psychotherapy, occupational therapist, physiotherapist, art therapist, with a strong focus on the psychological state of children.

2. The plan includes an increased access to education aims to create equal opportunities for everyone in society member to receive quality and inclusive education and training services. The aim is to ensure education access to support and coordinated services for children with special educational needs of disadvantaged children, national minorities children of communities who have returned and arrived from abroad, etc. Regional differences in achievement will be reduced through the provision of individual education and training assistance and the development of Lithuanian education services. It also ensures equal opportunities for entry into education aims to increase pre-school education and full - time school services for those at risk of social exclusion.

3. Quality early education accessible to all. Everyone has access to a good school and modern curriculum. In order to use resources more efficiently, there will be ensuring complementarity and diversity between formal and non - formal education programs for children; and greater participation of children in non-formal education.

4. Career education and careers planning consultations will begin at an early age (from grade 1). Careers a counselling and planning system will help students find areas of interest at an early age; and decide on possible future career scenarios. Children will gain knowledge of the competencies acquired educational institutions, will learn about the transition between different levels of education. To increase the financial literacy of children and young people and to raise financial awareness, methodological material will be developed during the implementation of the reform, which will be integrated into educational processes, thus ensuring long-term qualitative change in knowledge.

**4. Are there any red flags you would like to raise (unacceptable parts of the plan that you believe should not be included in the plan)?**

➤ NO

**5. Is there anything else you would like to share with us regarding your country's plan?**

The envisaged measures are ambitious, but they lack information on how they should be implemented.

## PORTUGAL

**SÉRGIO ARAÚJO – Individual member of Eurochild**

**1. Were you consulted in the drafting of your national recovery and resilience plan?**

➤ Not directly, but there was an open on-line consultation to provide comments/suggestions - without guarantees they would be included on the final version of the document.

**2. Are measures on children included in your national recovery and resilience plan?**

➤ Yes, but in a very deficient and generalist mode

**Any other comments:**

*Examples:*

Resilience principle (page. 18): expand the network of equipment and social responses to the level of children, the elderly and people with disabilities; but it is not sure it includes residential care. This could be a very problematic option when Portugal it's the country with the highest percentage of children in residential care.

On page 84 they propose to conclude the "Mental Health Reform and implementation of the Dementia Strategy (88 M €)" specifying children ratios: "Create 40 community teams with the ratios defined in the PNSM (national plan for mental health) (1/200 thousand inhabitants in adults, 1/100 in childhood and adolescence).

Portugal is preparing a Nation Strategy to combat Poverty 2021-2030. Page 96 makes the connection of NRR with its implementation but we still miss which particular action it will include.

Social responses, page 93: "Within the scope of this component, it is intended to reinforce, adapt, requalify and innovate social responses aimed at children, the elderly, people with disabilities and families, with a view to promoting births, active and healthy aging, inclusion and promotion autonomy and reconciliation between professional activity and personal and family life and social and territorial cohesion. It is also intended to promote an integrated intervention in disadvantaged communities, with a view to combating poverty."

Comment: These examples show how measures and policies for children are too generic – it is not clear which kind of responses are given to children needs. Moreover, no specific groups of vulnerable children is mentioned.

### **3. Does the plan include any targets or milestones concerning children?**

One specific indicator concerning children is mentioned: "Children and young people covered by support measures to combat school drop-out" (page 327), i.e. 11 561 children until 2025.

### **4. Are there any red flags you would like to raise (unacceptable parts of the plan that you believe should not be included in the plan)?**

➤ **YES**

1. Although the document mentions the possibility to be included in national strategy to combat poverty, it does not mention the Portuguese National Strategy for the Rights of the Child (2021-2024) approved in December 2020. The action plan for the implementation of such strategy is still ongoing and will soon be publicly announced. The NRR doesn't mention even the possibility of aligning with such action plan.

2. Portugal has a new law that clearly states that children in care should be placed in foster care. In this NRRP there's no mention of a national plan for the deinstitutionalization of such children from residential care to family and community based care. The plan to "expand the network of equipment and social responses to the level of children" might include actually the opposite, i.e. the maintenance of institutionalization as the main response on the Portuguese alternative care system.

Other general concerns:

- Does the state have the capacity to manage this amount of money in such a short period? This will probably make it difficult to set up new programs, while the State will probably rely on old programs

that do not take care of the new dynamics caused by the pandemic and new political instruments, such as the National Strategy for the rights of the child

- It is not clear what will be the role of local realities such as municipalities, which should have a major and clear role to assure that local needs are truly being taken into account, especially in a country not divided in regions like Portugal and with such high levels of territorial inequality.
- Stakeholders should be part of all the process, but the plan doesn't specify how
- The focus should be not only on "recovery" actions but also – and especially - on "transformative" actions.

## ROMANIA

### REVIEW FROM EARLY CHILDHOOD DEVELOPMENT PERSPECTIVE

#### 1. Were you consulted in the drafting of your national recovery and resilience plan?

- YES

Step by Step Center has a permanent dialogue with authorities, and our long-term advocacy efforts paid off by including in the Romanian NRRP the ECEC measures Step by Step Center proposed, as early as in 2016, for the multiannual program *Educated Romania*.

#### 2. Are measures on children included in your national recovery and resilience plan?

- YES, in a comprehensive and robust manner

#### 3. Does the plan include any targets or milestones concerning children?

The plan has a whole chapter dedicated solely to "Policies for the next generation, children and young people" and, in addition, children and young people are also envisaged in other chapters by measures like "Digitization of education", "School and university infrastructure" or "Dual, technical and vocational education".

The Romanian NRRP targets regarding children are the following:

- > Reviewing the legislative framework for the organization and functioning of the early education system by updating the construction norms.
- > Development of an integrated approach for early childhood through a mechanism of inter-institutional cooperation and intersectoral coordination, by providing education, health and care services for children up to the age of 6 years.



- > Simplification of the endorsement / accreditation / certification process, elaboration of quality standards and specific methodologies for obtaining the authorization for the operation of early education and complementary child care services.
- > Update of the Romanian code of occupations (COR) for the introduction of the occupations “educator for early education” and “teacher for early education”, system for recognizing the competencies acquired in the nursery activity for the care staff (childcare, specialized educator)
- > Creation, extension, modernization of infrastructure for the organization of early education services for children up to the age of 6, in order to increase the participation rate and promote the return of parents to work by updating and correlating demographic data and infrastructure, establishing alternative services or complementary, which coexist with formal services, the transformation of kindergartens with half-day program into kindergartens with all-day program or their transformation into educational and care services with extended all day program for children from birth to 6 years.
- > Grant scheme for the construction of 200 NZEB nurseries, which will use renewable energy / early education services and their operationalization by public operators.
- > Creating market-based tools to encourage private, non-governmental investment and public-private partnership (PPP) investment for all types of early education services.
- > Creating programs for disadvantaged groups (ethnic minorities, children from disadvantaged socio-economic backgrounds).
- > Creating a motivating salary system that would make the profession of educator / teacher attractive for early education.
- > Orientation of funds towards vulnerable schools and direct intervention at school and vulnerable child level: Development of an early warning mechanism in education for students at risk of dropping out of school (MATE); Grant schemes for 1600 schools identified with a large number of students at risk of dropping out - the funds will be used for interventions decided at school level, chosen from a menu of measures made available to the school and which contribute to reducing school dropout; High school bridge scholarship program - financial support for students at risk of dropping out of school.
- > Development of new standards for built environment and endowments of educational institutions.
- > Building schools in areas where the infrastructure is not adapted to current demographic realities.
- > Reform of the process of issuing the necessary authorizations to the educational units and the social infrastructures related to them, in the sense of clarifying and simplifying the procedures for all public and private operators.
- > School governance reform, according to the governance program: professionalization of the school management career in order to attract, ensure and manage resources at the level of the pre-university education unit.
- > National program for financing school infrastructure, including the new standards on construction and facilities, in full safety for school communities; Rehabilitation, extension or construction of student dormitories and canteens.
- > Flexibility and student-centered education system through digitization.
- > Digital development in education and training for a digital society and a green economy.

- > Strengthening the resilience and functional predictability of the education system in the digital age.
- > Development of digital skills of teachers to use open educational resources (digital pedagogy skills).
- > Developing students' digital skills by revising the curriculum of ICT subjects, as well as by adapting the school curriculum for learning in the virtual environment.
- > Legislative changes to generalize the digitization of processes and content in education.
- > Creating a grant mechanism for equipping schools with equipment to ensure optimal conditions for learning in the virtual environment, depending on the identified socio-educational risk, with a higher allocation per student for more vulnerable schools.
- > Creating a grant mechanism for the development of advanced digital centers in pre-university and university education.
- > Inclusion through digitization - developing an inclusive education system by developing and implementing accessible digital literacy programs for students with disabilities, athletes and hospitalized students.
- > Revision of the digital textbooks platform (manuale.edu.ro) by supplementing with school aids in digital format, for pre-university education.

**4. Are there any red flags you would like to raise (unacceptable parts of the plan that you believe should not be included in the plan)?**

- NO

## SLOVAKIA

**MARGARETA KOVACOVA, Individual member of Eurochild**

**1. Were you consulted in the drafting of your national recovery and resilience plan?**

- NO

**2. Are measures on children included in your national recovery and resilience plan?**

- YES, they are sufficiently included

**Any other comments:**

Slovakia's NRRP includes important and specific measures on children's rights, such as education and prevention.

With regards to education, it deals with the necessity to tackle child poverty, early school dropout and segregation via reforms which are highly needed, e.g. by introducing new legislation on segregation, providing methodological support and pilot projects. It also aims to increase the accessibility and eligibility of (financial) support in pre-primary education system.

One of the most important goals of the plan is the comprehensive (and financial) reform of child counselling and prevention system within the whole country. The aim is to improve the accessibility and quality of professional support, both for children and their caregivers/parents.

As we know from reports published by Missing Children Europe, improving quality standards of helplines and hotlines is an extremely important issue.

### 3. Does the plan include any targets or milestones concerning children?

Reforms related to desegregation are the following:

- creating new methodological materials by 2022
- developing a system for financing pilot projects by 2023
- developing a new system for monitoring and it's first report by 2025

Comment: the deadline for introducing new legislation on segregation is vague.

Reforms related to child counselling and prevention system are supposed to enter into force in 2021, with a transition time of 12 months.

Comment: the target is more than welcomed.

### 4. Are there any red flags you would like to raise (unacceptable parts of the plan that you believe should not be included in the plan)?

- NO

## SLOVENIA

### SLOVENIAN ASSOCIATION OF FRIENDS OF YOUTH

#### 1. Were you consulted in the drafting of your national recovery and resilience plan?

- NO

#### 2. Are measures on children included in your national recovery and resilience plan?

- YES, but in a tokenistic manner

#### **Any other comments:**

Children are only mentioned in a few areas; no special measures are planned for them.

NRRPs should be based on the 6 pillars as described in the Agreement between EC and the Council, the 6th pillar being policies on children and youth. In the Slovenian NRRP, the 6th pillar is only mentioned on p.18, in a

chapter named simply Next Generation, with no mention of children and youth nor any envisioned measures for them.

The reason behind this is explained as “demographic projections show that the number of older people will grow remarkably rapidly in the coming decades. Needs of other target groups (some groups of adults, children, adolescents) which are extremely small and constant in number compared to the elderly, will be addressed in a greater extent under measures financed from other sources.”

This is something that worries us.

### **3. Does the plan include any targets or milestones concerning children?**

Almost none.

The plan provides additional services within the network of counselling Centres for Children, Adolescents and Parents: 4 specialists of clinical psychology and 3 experts (psychologists, spec. pedagogues). Compared to the children’s needs (especially in the area of mental health) this is far too little.

The Plan also mentions the establishment of a network of children's mental health centres, which are very much welcomed. But the setting up of this network is financed by the MFF funds 21-27, and not from this plan.

### **4. Are there any red flags you would like to raise (unacceptable parts of the plan that you believe should not be included in the plan)?**

➤ NO

### **5. Is there anything else you would like to share with us regarding your country’s plan?**

In December 2020, in a joint initiative with Eurochild, we called on the Ministry of Finance and the Ministry for Foreign Affairs to place child well-being at the centre of the NRRP. The answer of the Ministry of Finance was that the key purpose of the mechanism will be to increase the resilience of the economy through structural changes, which in particular will benefit future generations. We understand this as investing in digitalization of education system and strengthening student's digital competences.

The plan does not include or even mention Child Guarantee, which we consider a very important mechanism for improving well-being of children.

Civil society was overlooked, and there was no public debate about the plan.

In one of the shorter versions of the plan it is said: »We will not leave anyone aside and no part of Slovenia will be neglected«. In our opinion children will be left aside, because all tendencies go in the direction of helping elderly.

## SPAIN

### PLATAFORMA DE INFANCIA

#### **1. Were you consulted in the drafting of your national recovery and resilience plan?**

➤ NO

“Plataforma de Infancia” had bilateral meetings with representatives of the Ministry of Social Rights. At these meetings, component 22 (children) was vaguely discussed. However, we do not consider that this can be understood as an adequate and sufficient consultation.

The Third Sector Platform, a platform of which Plataforma de Infancia is member, is part of the Social Forum of the Ministry of Social Rights. This forum has held only one meeting in which component 22 (children) was discussed. However, this forum has not had the opportunity to really influence the Spanish Plan.

#### **2. Are measures on children included in your national recovery and resilience plan?**

➤ YES, but they are insufficient

##### ***Any other comments:***

There are 4 components out of 30 which include a large number of measures aimed at children, especially those related to the Ministry of education and - to a lesser extent - the Ministry of social rights. The components are:

- 19. National Plan for Digital Skills
- 20. Strategic plan to promote Vocational Training
- 21. Modernization and digitization of the education system, including early education from 0 to 3 years
- 22. Plan for the care economy and reinforcement of inclusion policies

These plans address important reforms especially in issues such as early childhood education or issues related to the educational system, as well as reforms in the infrastructure of the alternative care centers. However, issues such as child poverty or other structural problems are not adequately addressed.

The government has announced that other components will have an impact on children, such as 11, 15, 16, 17, 23 and 24, but the impact of the latter is lesser and children are not the main recipients or targets of them.

#### **3. Does the plan include any targets or milestones concerning children?**

There are no clear indicators regarding specific figures to improve existing rates, but there are objectives to be achieved, in particular:

##### **Component 21**

- The creation of 65,382 new public places for Early Childhood Education
- Significant reduction in early school leaving rates and repetition rates to approach the EU targets in 2030.
- Design and application of a new curricular model based on key, flexible and open competences, prioritizing fundamental learning, and regulation of an inclusive academic arrangement

### **Component 22**

A Family Diversity Law will be approved with two main objectives: legal recognition of the various types of existing family structures; establishment of the benefits and services to which they are entitled according to their characteristics and income levels.

Modernized care for children: With the creation, adaptation and improvement of residential infrastructure, based on quality standards that guarantee hygiene and health measures, adequate spaces for study and leisure activities, the elimination of architectural barriers, privacy and the safety of children, young people and their caregivers. This improvement of the infrastructures will favour the reform of the care model, promoting one that is more focused on the rights of the child and the social and / or professional inclusion of the young. For this, it is necessary to have smaller and more flexible centers, flats or units that allow for a more personalized attention to their affective needs and personal, educational and professional development, greater proximity to the community environment and a better transition to family reintegration and / or to independent living. This reform will also allow the generation of child and adolescent participation processes, and of professionals, in the design of infrastructures and in the improvement of protection models and processes. These improvements include providing internet access to residential centers and flats.

#### **4. Are there any red flags you would like to raise (unacceptable parts of the plan that you believe should not be included in the plan)?**

➤ NO

#### **5. Is there anything else you would like to share with us regarding your country's plan?**

Stakeholders have not been adequately consulted in the drafting of the Plan.

The plan lacks sufficient indicators to be able to evaluate it in the future.

Generally speaking, it seems like an adequate Plan, although there are great risks that such a huge investment concentrated in such a short period will lead to an inappropriate use.

The most worrying aspect is that some urgent issues, such as child poverty, substantial reforming the he child care system, or adequate spaces for children in judicial processes, are not sufficiently incorporated in these plans.