



Reponse to the public consultation on the EU Green Paper on Ageing



AGE Platform Europe
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Introduction

This document is the copy of AGE Platform Europe’s responses to the public consultation of the European Commission on the EU Green Paper on Ageing. AGE’s response to the consultation also includes an Age Equality Strategy as an annex. It is available in complement to the present document.

It should be noted that this contribution has been prepared by AGE Secretariat in Brussels, Belgium, based on the numerous policy positions developed with its member organisations over the years. Many AGE member organisations have also submitted their own response to the public consultation.

Abbreviations

AGE: AGE Platform Europe

AROPE: At Risk of Poverty and Exclusion

EIOPA: European Insurance and Occupational Pensions Authority

EP: European Parliament

EPSR: European Pillar of Social Rights

EU: European Union

LLL: Lifelong Learning

LTC: Long-Term Care

PEPP: Pan-European Personal Pension Product

R&D: Research and Development

STEM: Science, Technology, Engineering, and Mathematics

UN: United Nations

UNCRPD: United Nations Convention on the Rights of Persons with Disabilities

WHO: World Health Organisation

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Question 1 on healthy ageing

How can healthy and active ageing policies be promoted from an early age and throughout the lifespan for everyone? How can children and young people be better equipped for the prospect of a longer life expectancy? What kind of support can the EU provide to Member States?

WHO defines healthy ageing as “*the process of developing and maintaining the functional ability that enables wellbeing in older age*”; i.e. having the capabilities to be and do what people have reason to value, including ability to meet basic needs; learn, grow and make decisions; be mobile; build and maintain relationships; and contribute to society.

To foster active and healthy ageing we need a fundamental shift in how we think about old age and how we frame our policy approaches to ageing. A lifecourse approach is critical: unlike a lifecycle approach, it pays due attention to the social context, roles and individual trajectories. Strategies to ensure equal opportunities for active and healthy ageing should target individuals at various points of their lives instead of focusing on specific age categories.

However, specific action may be necessary when the position of older people and the real conditions/opportunities available to them are fundamentally different to those of other age groups. This shows the importance of combating socio-economic inequalities and lifetime discrimination experienced by people of all ages, including ageism, and is the best way to ensure equality in older age.

We call on the EU to:

- Improve data availability and quality to better understand the diversity of older people and address barriers and discrimination older people face.
- Put equality and non-discrimination at the core of its initiatives: adopt a legislation and measures to prohibit and combat discrimination across sectors.
- Implement the recent Council conclusions on ageing (Oct. 2020, March 2021).
- Lead the rallying for a new UN Convention on the rights of older people.
- Ensure a participatory approach as planned within the UN Decade of Healthy Ageing (2021-2030); develop a strong cooperation around the Decade and the Global report on Ageism.
- Prioritise public health in all relevant EU funding instruments: the EU budget offers multiple opportunities to help build a healthy Europe, and to combine that objective with other important goals including fighting the climate and environmental crisis, tackling psycho socio-economic and regional inequalities, improving healthcare systems, ensuring a fair, open and secure digital environment.

- Mainstream the impact of EU policies on people's health, following the health-in-all policies approach (Council Conclusions, Feb. 2019).

Question 2 on life-long learning

What are the most significant obstacles to life-long learning across the life-cycle? At what stage in life could addressing those obstacles make most difference? How should this be tackled specifically in rural and remote areas?

Research shows that life-long learning (LLL) is beneficial at any age, making a sole focus of education policies on younger and working-age populations inadequate. Yet, the EU does not apply the UNESCO definition of LLL as *"integration of learning and living, covering learning activities for people of all ages, in all life-wide contexts... and through a variety of modalities (formal, non-formal and informal) that meet a wide range of learning needs and demands"*.

Rather, EU policies target either the formal, initial education sector (cf. Digital Education Action Plan) or the labour market (cf. Upskilling Pathways). The EPSR Action Plan's Education target, despite an ambition to reach 'all adults', only covers people until 65. In addition, while, employers do not see the benefit nor are encouraged to invest in training of their older employees, (cf. low rates of uptake by older workers), the exemptions for education and training in the Employment Directive create an impression that this is permissible.

Last but not least, the accessibility and availability of learning opportunities are a challenge notably for older people living in rural areas, older people with disabilities, older people living in institutional environments. And the increasing digitalisation of information and provision of life-long learning creates an additional barrier. All this shows how challenging is still the implementation of the art. 14 of the EU Fundamental Rights Charter on the right to education.

We call on the EU to:

- Increase the age groups covered by education and learning indicators in Eurostat to fully encompass pensioners and include them in the targets of the EPSR Action Plan.
- Better apply and support the EU's key competences framework for LLL', including also health literacy as a competence, promoting also learning in areas that are not linked to the labour market.
- Adopt an EU initiative on individual learning accounts and paid educational leave for all workers to engage in learning during working lives.
- Increase public support for non-formal and informal learning and make it a valued source of learning.

- Create frameworks for financing, quality and access to these forms of learning.
- Apply the recommendation on validation of skills and increase access to validation.
- Address the digital skills divides along the life-course.
- Fund innovative projects for LLL targeting institutional settings, rural areas and older learners specifically.

Question 3 on employment

What innovative policy measures to improve participation in the labour market, in particular by older workers, should be considered more closely?

Older workers face major obstacles in the EU, rooted in ageism and discrimination. The EU Employment Directive contains unclear language and exemptions; jurisprudence allows discriminatory practices and mandatory retirement. While many workers stay longer in the labour market leaving their jobs later, those who lose their job before are seldomly reemployed. Other barriers are disability, lack of reasonable accommodation, and lack of encouragement linked to ageism, no access to training, a paradigm of a linear career paths and lack of a career management approach. Work-life balance, gender care gaps and gender segregation particularly hit older female workers.

We call on the EU to:

- Revise the Employment Directive, unambiguously ban mandatory retirement and progressively phase out different pension ages for women and men.
- Strongly discourage the practice of targeting older workers to leave employment as part of restructurings, particularly in the current crisis. Training and outplacement services should be privileged. Analyse the success factors of support to employers of older workers through lower taxes or social contributions.
- Enable flexible transitions into retirement, such as working time arrangements to encourage workers to stay for longer.
- Fight and prevent physical and psycho-social risks such as stress and burnout in the next EU Occupational Safety and Health Framework. Improving mental health at work should be a priority.
- Change paradigm from a focus on reducing unemployment to career management, with mid-career assessments of needs, skills and aspirations, job rotation and learning in all settings without discrimination.

- Better protect workers with caring responsibilities; propose an initiative for increasing carers' leave duration and to introduce minimum standards for remuneration and social protection of informal carers.
- Give stronger priority to reducing the gender gaps in the labour market.
- Enforce, promote, and support the right to reasonable accommodation for workers with disabilities, as well as reintegration and rehabilitation of workers after sick leaves or care leaves by funding and regulation, including through public support for employers.
- Pioneer outreach of public employment services to pensioners who might want to return to the labour market.

Question 4 on social innovation & entrepreneurship

Is there a need for more policies and action at EU level that support senior entrepreneurship? What type of support is needed at EU level and how can we build on successful social innovation examples of mentorship between young and older entrepreneurs?

Senior entrepreneurship is for some older persons a way to stay active and continue to work beyond retirement; in cases where they have lost their employment and unable to find a new one because of age barriers, is it also a way to bridge the time between employment and retirement. It can help older persons with inadequate pensions to have an additional income, although it can be argued it is unlikely for older persons at the brink of poverty and social exclusion to have the resources to start a thriving business. Mentorship is an important tool to keep older persons linked to the labour market after retirement and to change stereotypes and attitudes towards older workers. The EU has developed a useful [good practice guide](#) on senior entrepreneurship in 2016.

We call on the EU to:

- Assess and reduce financial disadvantages for senior entrepreneurship, such as the reduction or loss of pension payments or the inability to pay contributions to accrue pension rights.
- Fully include senior entrepreneurs (i.e. also those beyond statutory retirement age) into social protection, such as through the provisions of the Council recommendation on access to social protection.
- Fund projects such as incubators for intergenerational co-entrepreneurship, where the skills and needs of younger and older entrepreneurs can be complementary.

Question 5 on rural areas

How can EU policies help less developed regions and rural areas to manage ageing and depopulation? How can EU territories affected by the twin depopulation and ageing challenges make better use of the silver economy?

Rural areas face the particularity of being populated by a larger share of older people. Many rural areas face the reality of being deserted by public and private services: medical services, schools, childcare, long-term care, banking, shopping, administrative services etc. Rural areas may also face particular challenges in lack of accessibility and community services such as for volunteering, socialising, access learning and recreational activities. While older people are more exposed to this phenomenon because they may be less mobile than younger persons (homeownership, sense of community and belonging, social contacts, ...), these services are just as important for younger people. Revitalising rural areas therefore has the double advantage of improving quality of life of older persons and encourage younger families to settle.

We call on the EU to:

- Enable the use of cohesion funds to develop services such as child care, health and long-term care, as well as the development of life-long learning and community activities. But also, intergenerational spaces for housing and activities, support for cultural and sports activities.
- Focus on the development of community-based care services in rural areas, as there might be a tendency to geographically concentrate care provision into institutions. Invest into the coverage of rural areas by high-speed internet connectivity as well as developing offers for increasing digital skills of older people in all ages in rural areas (cf. Q15).
- Pay particular attention to accessibility of rural environments and the availability of affordable mobility services, including through recommendations in the European Semester (cf. Q15).
- Focus on rural areas for developing mentoring and intergenerational co-entrepreneurship activities.
- Understand the 'Silver Economy' as an economy offering potential and solutions for people of all ages, covering a wide range of areas including mobility, housing, culture and tourism. Promote mainstreamed solutions for wider increasingly age-diverse consumers rather than niche products/services for older people that are stigmatising and/or targeted at rather well-off people. A more inclusive approach caring for accessibility and affordability, as well appealing to all age groups has a higher potential.

Question 6 on volunteering & intergenerational contacts

How could volunteering by older people and intergenerational learning be better supported, including across borders, to foster knowledge sharing and civic engagement? What role could a digital platform or other initiatives at EU level play and to whom should such initiatives be addressed? How could volunteering by young people together with and towards older people be combined into cross-generational initiatives?

Volunteering by older persons is an important way to remain active beyond the labour market, yielding benefits in terms of social inclusion, well-being and health, all while creating value to society. Support in engaging with volunteering, especially in the phase of the transition from the labour market into retirement, would be beneficial to support healthy ageing. Volunteering can take the form of providing informal care, still the situation of informal carers is very specific and requires adequate and specific support (cf. also Q9 to 14).

While volunteering is supported by the EU through the European Solidarity Corps, the Erasmus+ and the Europe for Citizens programmes, there is little or no focus on older persons in these programmes. Cross-border learning was supported by the EU as part of the GRUNDTVIG programme, which however was not maintained during the transition into Erasmus+. It should be noted that it is important to support volunteering for all age groups: volunteering is a key social sector/activity where generations can mix thus contributing to intergenerational contacts, mutual understanding, and reduced ageism.

We call on the EU to:

- Improve data collection to map, understand and count the contributions made by older people through volunteering and intergenerational exchanges.
- Include mobility for adult learners into the Erasmus+ programme under the support for adult learning and to include intergenerational exchange as a specific objective of the Erasmus+ adult learning programme.
- Provide people engaged voluntarily into informal care activities with opportunities for training and exchange, such as via funding by the ESF+ or other European funds.
- Make volunteering accessible to all: procedures to apply, online platform and communication used to promote and enable volunteering should be accessible.
- Assess the need and expectations of volunteers before launching a new digital platform (see Council Conclusions Oct. 2020). For example, a platform could centralise offers for cross-border learning and volunteering

opportunities and available funding for it via Erasmus+, ESF+ or Europe for Citizens and national programmes.

- Strengthen the intergenerational dimension of volunteering by supporting programmes for volunteers to support social services such as education and care. However, volunteers cannot replace trained professionals, a focus must be on the improvement of well-being of service users rather than supporting services in their core missions.

Question 7 on autonomy & independence

Which services and enabling environment would need to be put in place or improved in order to ensure the autonomy, independence and rights of older people and enable their participation in society?

Autonomy, independence, equal opportunities for full and effective participation in society, but also access to health, care and support, education and lifelong learning, access to work and access to justice: all these covered by the Green Paper are fundamental rights. In order to ensure these human rights can be equally by all individuals regardless of age, all EU initiatives need to be grounded on human rights standards and principles, including among others the EU Charter of Fundamental Rights and the UN Convention on the Rights of Persons with Disabilities (UNCRPD).

Unfortunately, most of the policy thinking on ageing - including at least partly also this Green Paper - still frames ageing as a challenge, and older people as vulnerable individuals in need of protection. This mindset reproduces negative stereotypes and impinges on efforts to foster autonomy, independence, participation of older people and the equal enjoyment of all human rights in old age.

We call on the EU to:

- Adopt a rights-based approach to guide policy thinking on ageing, as mentioned in the recent Council conclusions, adopted by the German and Portuguese presidencies (9 October 2020 and 12 March 2021), and in the 2018 report of the EU Fundamental Rights Agency.
- Elaborate an 'EU Age Equality Strategy' that would provide a much needed conceptual and policy framework for dedicated ageing policies and also for age-inclusive mainstreaming using a rights-based approach. An Age Equality strategy would complement the existing EU acquis, which already includes strategies on gender, disability, children, LGBTI+, Roma in line with EU's priority to build a Union of Equality.

It would also allow the EU to better address inequalities across the lifecourse and to combat intersectional forms of discrimination. An

essential component of this strategy would be to push for the adoption of new anti-discrimination legislation covering among other grounds also discrimination on the basis of age.

- Ensure a proper implementation and monitoring of legal instruments like the European Accessibility Act, the Web-accessibility Directive, as well as transport accessibility legislation and continue working to expand the legal tools and relevant EU standards to support accessibility (e.g. implementation of the European Standard on accessibility of the built environment – EN17210).

Question 8 on situations of vulnerability

How can the EU support vulnerable older persons who are not in a position to protect their own financial and personal interests, in particular in cross-border situations?

Older people may find themselves in a situation of vulnerability in terms of accessing justice, defending their interests, and exercising their human rights. Due to persistent ageism, they are at greater risk of unfair treatment, exploitation, or abuse and exposed to further victimisation, intimidation and retaliation. Cross-border settings can lead to additional obstacles, due to linguistic, technological, legal, administrative, physical accessibility and other barriers. However, we stress that older people are not inherently vulnerable and in need of protection. We need to focus on the barriers such as lack of support (legal aid, independent advocacy services, ...), and enabling environment (physical or digital barriers, absence of laws, age limits, lack of information and literacy) that create situations of vulnerability.

A key barrier to accessing justice and remedy is the law itself. At EU level, the lack of legal prohibition of age discrimination beyond the field of employment entails that in many countries it is impossible to challenge decisions denying older people insurance or a loan. Additionally, sometimes there are discrepancies in law. For instance, whereas under the UNCRPD institutionalisation is prohibited, international norms merely call for allowing older persons to live at home 'for as long as possible'. Given this caveat, it is more difficult for older persons to access justice in cases of forced placement, coercion or breaches of autonomy.

We call on the EU to:

- Improve information about the law and how to exercise rights, e.g. in case of elder abuse.
- Adopt a rights-based approach in full compliance with the standards of the UNCRPD.

- Help member states accelerate efforts to develop systems that are compliant with the UNCRPD, including for instance through supported decision-making mechanisms. We share concerns that the potential ratification and implementation of the 2000 Hague Convention on the protection of vulnerable adults would allow the continuation of practices that are prohibited by the UNCRPD, including guardianship and involuntary placement and treatment.
- Ensure that all EU legislations and initiatives, including the 2012 EU Directive on Victims' Rights and the EU Victims' Rights Strategy 2020-2025, take into account the specific issues faced by older people and persons with disabilities who are at a higher risk of becoming victims of crime including in cross border settings.

Question 9 on social protection systems

How can the EU support Member States' efforts to ensure more fairness in the social protection systems across generations, gender, age and income groups, ensure that they remain fiscally sound?

Fairness means that everyone is guaranteed the right to social protection and an adequate standard of living, as enshrined in international treaties, and the EU Charter of Fundamental Rights (Art. 34). Fairness in pensions means compensating for periods where a person was unable to provide contributions. It also means that while pension rights should reflect the contributions made during the lifecycle, higher contributions should also fund solidarity mechanisms. It furthermore means that everyone should be able to contribute and be protected by social protection for major life risks: unemployment, sickness, health and long-term care, family benefits for children and informal carers, old-age income and disability.

We call on the EU to:

- Change the narrative around ageing that perpetuates a perception of older age as a period of decreased productivity and capacity and consider a lifecycle approach to social protection and intergenerational fairness, given the increasing fluidity between periods of life.
- Ensure social protection systems cover everyone, including those working in new forms of jobs, working in the informal economy, younger people facing unemployment without having worked, and expand automatic disbursement to ensure people in vulnerable situations access their rights to social benefits.
- Guarantee solidarity mechanisms in the pension system to ensure an adequate standard of living to all, regardless of the mix of pension pillars, including by adopting an initiative on pension credits for care.

- Require ex-ante impact assessment to pension reforms and promote gradual adaptations rather than radical change in reforms to preserve the intergenerational contract.
- Rather than focussing on statutory retirement age, move towards empowering older workers to stay in the labour market; remove barriers such as mandatory retirement or the inability to combine work and pensions.
- Establish long-term care as a social protection risk in all member States.
- Adopt an initiative for the social protection of and services to informal carers.
- Maintain and improve support for young people via the Child and Youth Guarantees, especially those in vulnerable situation.
- Consider innovative solutions to ensure fairness (e.g. tax income from profits, financial transactions or pollution to fund social protection) and adopt a lifecourse perspective approach, notably to better measure the impact of social investment.

Question 10 on poverty in old age

How can the risks of poverty in old age be reduced and addressed?

Old-age poverty and social exclusion is an increasing risk in the EU, as shown in rising of AROPE (At Risk of Poverty and Exclusion) rates for persons 75+, esp. among women, a number of member states where poverty and social exclusion rates are extremely high and the higher-than-average poverty and social exclusion rate of older workers (55-64).

Tightening of the link between contributions and benefits and reduction of benefits have increased this risk in the past. Lack of appropriate indexation of pension benefits means an erosion of benefits over time and old-age poverty for many of the oldest old. Insufficient minimum pensions mean that even people who have worked on low incomes throughout their lives face the risk of old-age poverty.

There is pressure to reduce survivor's pensions, which are currently an important tool to maintain lives out of poverty and social exclusion for older women. Discrimination and disadvantages accumulated during the lifecourse mean a higher risk of old-age poverty in particular for women, persons with disabilities, ethnic minorities, LGBTIQ and persons with migrant background. The Council recommendation on minimum income of October 2020 is a chance to fully embrace minimum pensions as one element of adequate minimum incomes in the EU.

We call on the EU to:

- Create a EU framework for minimum pensions when updating the EU framework on minimum income, setting a methodology taking into account

the costs to maintain an adequate and healthy standard of living, especially in case of need for long-term care and support or health care (medication).

- Adopt an initiative for the social protection and services of informal carers as well as one to introduce adequate pension credits for child care across the EU.
- Ensure adequacy of pensions over time by guaranteeing pension indexation at least in line with inflation, but taking into account the specific expenses of older people (like health, long-term care).
- Maintain survivor's pensions to protect older women from old-age poverty.
- Ensure coverage of all types of work by pension insurance and inclusive old-age labour markets (cf. Q9).
- Establish ex-ante impact assessments of pension reforms on these points.
- Target older peoples' homes in initiatives such as the 'Renovation wave' to protect them from energy poverty and poor housing conditions (cf. Q17).
- Ensure that disability benefits do not stop at a specific age.
- Revise the EU statistical framework to make poverty and social exclusion of 85+ visible.

Question 11 on adequate pensions

How can we ensure adequate pensions for those (mainly women) who spend large periods of their working life in unremunerated work (often care provision)?

Much of the EU's action in the field of gender equality focusses on younger and working-age women, notably to close the child care gaps, the gender pay gap and gender segregation in high-earning professions (STEM). Older women are left out of this framework: gender gaps (employment, hours and pay) are highest for women 55-64 and women have a very high risk of old-age poverty, particularly above 75. Women are mainly present in the informal economy, such as in domestic work, unable to pay pension contributions. Professions with a predominance of female workers are less covered by collective agreements and therefore lack access to occupational pensions; gender pay gaps mean that women are less likely to contribute to private pensions as well.

We call on the EU to:

- Preserve solidarity mechanisms and survivors' pensions in statutory pension systems by fully including their efficiency into Country Reports and Country-Specific Recommendations.

- Adopt an initiative for introduction of pension credits for care to children and persons in need of care and assistance in all EU member States.
- Adopt an initiative for the social protection of and services to informal carers, covering access to social protection rights also beyond pensions (income support, health care, unemployment insurance) as well as supporting services such as day-care and respite care.
- Apply the Recommendation on Access to Social Protection and cover all forms of work.
- Fully implement the [Barcelona targets](#) on early childhood education and care.
- At the earliest possible date, assess the impact and revise the Directive on Work-Life Balance for Parents and Carers in view of increasing the number of days of carers' leave and set minimum standards for remuneration and protection of informal carers.
- As part of the initiative on minimum income, establish a framework for adequate minimum pensions established, covering also persons who have been working all their lives but were relegated to the informal economy.

Question 12 on supplementary pensions

What role could supplementary pension play in ensuring adequate retirement incomes? How could they be extended throughout the EU and what would be the EU's role in this process?

Supplementary pensions are often invoked as a solution to the 'pension gap', the stress placed on the pension systems by the effect of population ageing, a time-limited effect within the next decades. The 2018 Ageing Report showed a return to spending levels on pensions to 2016 levels by 2070.

Interventions making labour market more inclusive, increased participation at all ages and particularly of older workers, shifts in retirement ages, improved productivity through education and upskilling, R&D investment and technological change have a high potential to offset these effects.

Supplementary pensions are by definition not accessible to all, either because they rely on voluntary contributions by employers or coverage by collective agreements (occupational pensions) or income levels that allow individuals to put money aside (private pensions).

Statutory pensions are for the time being the only type of pension which include solidarity mechanisms for lost income due to informal care, disability, disease or unemployment. Therefore, supplementary pensions cannot play the only role in

offsetting the costs of demographic change in a spirit of social justice and solidarity between generations. Still, they can contribute in a number of ways.

We call on the EU to:

- Regularly assess the coverage of the total workforce by occupational pensions, as well as eventual gaps in coverage linked to gender, branch, employment contract etc. in EIOPA's consumer trends report.
- Lead a reflection on how occupational pension coverage can be expanded especially to groups who have no access to such pensions and the impact of occupational pensions on the gender pension gap.
- Legislate to ensure safe and understandable investment products with caps and transparency in their costs of administration and distribution, such as the PEPP (pan-European Personal Pension Product), and ensure effective competition and consumer choice for investment products.
- Reduce conflicts of interest of retailers of investment products.
- Ensure tax subsidies for private pensions do not constitute forms of regressive taxation that lead to reduced financial resources for social protection systems.
- Follow-up on the recommendations of the high-level group on supplementary pensions whose final report was released in Dec. 2019.
- Long-term investment such as pensions cannot counteract the need to shift to more sustainable growth models. Especially where consumers have no choice about the way their savings are invested, environmental sustainability must be ensured.

Question 13 on sustainable health and care

How can the EU support Member States efforts to reconcile adequate and affordable healthcare and long-term coverage with fiscal and financial sustainability?

In long-term care and support for older people, lack of access, unaffordability and low quality are issues consistently reported. Given those challenges, increasing their levels of public spending on long-term care is a necessary policy for EU Member States, not only to compensate for increasing demand but also to enforce a true right to quality long-term care as prescribed by the European Pillar of Social Rights (EPSR).

Likewise, if put at the heart of a lifecourse perspective, health promotion and disease prevention can be a powerful tool to combine improved access, greater levels of quality and sustainability of public budgets. Addressing challenges in

care should therefore be part of a comprehensive, long-term strategy combining investments and prevention, especially now in the pandemic recovery and crisis preparedness period (cf. Q1). A wide understanding of sustainability should also take into account the multiple positive spillovers of better access to quality, professional care services.

We call on the EU to:

- Promote a lifecourse approach demonstrating the link between investments in people's health throughout their lives and the levels of long-term care needs in older age.
- Addressing long-term care and sustainability issues as part of EU's policy making in all areas, in line with health-in-all-policies approach.
- Adopt a comprehensive approach to fiscal sustainability, notably in the analyses of the Ageing Report, the Joint Employment Report, and the European Semester. This should include measurements of the negative spillovers associated with the lack of access to quality professional care and support like:
 - lost economic output due to lower labour market participation, especially by women;
 - increase in mental and physical health conditions among informal carers;
 - avoidable use of healthcare resources as a result of lack of access or access to insufficient services (e.g., rehabilitation and prevention);
 - loss of income associated with unaffordable care costs and informal care provision;
 - burnout and safety issues among care professionals;
 - lost potential for job creation in the care sector.
- Have a comprehensive approach of the indicator "spending on long-term care" proposed by the Action Plan of the EPSR and read it together with the levels of access in terms of coverage of needs/unmet needs.
- Ensure EU's tax policies and funding programmes contribute to access to and sustainability of social rights, including health and long-term care.

Question 14 on quality long-term care

How could the EU support Member States in addressing common long-term care challenges? What objectives and measures should be pursued through an EU policy framework addressing challenges such as

accessibility, quality, affordability or working conditions? What are the considerations to be made for areas with low population density?

There are gaps in access to long-term care and some services have discriminatory practices in admission (eligibility and allocation). Affordability issues are linked with the weak social protection for LTC in the EU, most often a highly means-tested safety net and not a universal entitlement. When social protection is available, the hours of care covered are often insufficient. Due to the scarcity of resources, the difficult working conditions, the over-reliance on informal care and services that overlook the dignity of care recipients, quality is a concern.

Reforms aiming at containing costs seem to have aggravated the situation. Thus, the right of older people with care needs to live autonomously and independently, as well as free from violence, abuse, and neglect, is at risk. The COVID-19 pandemic has revealed the strong impacts of these pre-existing challenges. Those challenges are persistent across the EU but may be greater in rural and isolated areas where services are more often unavailable.

We call on the EU to:

- Introduce EU-wide quality and access indicators for long-term care and support, and to allow for benchmarking by building on existing reporting systems.
- Set compulsory access targets, similarly to the [Barcelona targets](#) for childcare, to measure progress in access to long-term care and support. Data on access should be disaggregated by care setting – institutions, community and at home. Particular ambition should be given to the development of access to community and home-based services, in line with the UNCRPD and principle 18 of the EPSR.
- Develop a common strategy for the implementation of integrated care, within and between health and social care services.
- Introduce a common approach to measures to support informal carers (cf. Q3, 9, 11, 13).
- Improve working conditions in the care sector, via a dedicated EU Sectoral Social Dialogue for social services to raise qualification and training requirements, wages and health and safety at work.
- Enforce regulations in the running of private for-profit care services, including assessing the possibilities for action at EU level to address the lack of quality and insufficient enforcement of regulations.
- Use the potential of the Resilience and Recovery Facility to address the challenges in LTC, with a particular focus on home and community-based services.

- Fund and upscale innovative practices on access to care in rural and low-density areas to enable older people remaining at home and in their communities.

Question 15 on digitalisation of services

How can older people reap the benefits of the digitalisation of mobility and health services? How can the accessibility, availability, affordability and safety of public transport options for older persons, notably in rural and remote areas, be improved?

This broad question is very much linked to the issue of environments which play an important role since they hold incredible potential for enabling or constraining the possibilities and capacities we have to be included in our societies. The COVID crisis shed lights on how much digitalisation can help in a pandemic context but also reinforce barriers, notably for already excluded. Likewise, mobility is crucial.

We call on the EU to:

- Continue its effort to ensure accessibility through design-for-all across the EU, in compliance with the UNCRPD, by enforcing the existing EU laws, reinforcing them notably in relation to the build environment and continuing developing accessibility standards.
- Support via the different EU funding schemes, the development of enabling physical and digital environments which are crucial to support autonomy and independence as clearly described by the [WHO concept of age-friendly environments](#).
- Tackle the digital divide and digital poverty which increase social exclusion and create further inequalities. This should encompass funding support and initiatives to improve infrastructure (access to electricity and broadband coverage), to support equipment (PCs, tablets, smartphones) and digital literacy (cf. Q2).
- Coordinate efforts across policies notably linked to social protection, employment and education to tackle inequalities, and poverty and social exclusion, therefore impacting the digital divide.
- Whenever needed, support the access of older people to specific technologies (assistive technologies) which assist them in accessing physical and digital environments, as well as services provided to the public, such as health-care services.

- Ensure a full equal access to services, so that face-to-face options remains available whenever services are digitalised (e.g. public administration, transport, bank).
- Prioritise accessible and affordable public transport (vehicles, infrastructure, built and outdoor environments) in its funding programmes in order to ensure door-to-door mobility between and within EU countries, therefore enabling participation and social inclusion and tackling geographical divide, notably for people living in remote and/or segregated community/area.
- Coordinate efforts across policies notably linked to social protection, environment and transport to strengthen equal access to mobility and healthy environments for all.

Question 16 on Loneliness & social isolation

Are we sufficiently aware of the causes of and impacts of loneliness in our policy making? Which steps could be taken to help prevent loneliness and social isolation among older people? Which support can the EU give?

The issue of loneliness and social isolation among older people is well known by organisations active on ageing issues for a long time as shows the work conducted through the [ROSEnet Cost Action](#). The COVID-19 pandemic has again shed light on this issue. From the very beginning, we have made clear that the containment measures taken to constrain the virus spread should not break our social bonds.

We call on the EU to:

- Adopt a lifecourse approach to understand how exclusion evolves across the lifespan and assess the causes and implications of old-age exclusion.
- Recognise the differences (1) between social and emotional loneliness; and (2) between social isolation and exclusion, considering they need to be addressed differently.
- Continue to support research and data collection to better understand the variety of situations faced and the impact of loneliness and social isolation, including through a regular module in Eurostat.
- Support participatory approaches and processes involving isolated persons so that they contribute from their perspective. During the COVID pandemic a number of decisions have been taken without consulting targeted groups, like older people living in residential care.

- Encourage exchanges and learning between member states and local authorities on how to combat loneliness.
- Enhance the overall coherence of policy making, e.g. impact of dematerialisation/digitalisation of local services, importance of access to public transport, to education, to cultural activities, to volunteering. Interrelationship between the physical and social environments notably with the access to community-based services, to adequate housing, accessible outdoor spaces. Link with social protection and adequate income (Q9, 11, 12).
- Develop a European Mental Health Strategy to foster the right to mental health and to access health services and social support, including non-drug-based support regardless of age.
- Support projects and initiatives focusing on transition periods when exclusion from social relations may be more of a risk (e.g. bereavement, retirement, onset of ill health, assumption of caring roles etc.) that will help to design interventions focusing on these transitions or to promote existing initiatives.
- Tackle the digital divide and digital poverty: while the successive quarantines have shown how digital technologies can help connect people, they are also reminding us of the inequalities that exist in accessing them (see Q15).

Question 17 on housing & built environments

Which role can multigenerational living and housing play in urban and rural planning in addressing the challenges of an ageing population? How could it be better harnessed?

“Housing is essential to safety and well-being. (...) There is a link between appropriate housing and access to community and social services in influencing the independence and quality of life of older people” (WHO, Global Age-Friendly Cities: A Guide, 2007). Supporting the right to housing is therefore critical given its critical impact on everyone’s well-being (mental and physical). This topic is very much interlinked with notably Q5, 14 and 16.

We call on the EU to:

- Support initiatives and policies which are compliant with the art. 19 of the UNCRPD, i.e. ensuring independent living and inclusion in the community at all ages. All older people should have the choice to decide where and with whom to live, enabling them to remain independent in the community they feel most comfortable in. Multigenerational housing should be based on the free and informed consent of the person.

- Continue its effort to foster accessibility of the built environment and outdoor spaces (see Q7) and comply with the UNCRPD: dwellings are part of a continuum that should enable older people to be independent and autonomous.
- Adopt a lifecourse approach: innovative housing solutions can also help designing alternative housing options, allowing older people to choose other solutions than either the family house or the residential care. Moreover, housing that adapts to changing needs of its inhabitants would not only enable people to remain in their homes as they age but also support carers.
- Enhance a comprehensive approach of EU policies and initiatives related to housing such as:
 - Renovation Wave for Europe and more largely the Green Deal, taking into account populations, including older people, who are vulnerable to extreme weather conditions;
 - Funding programmes available to tackle energy poverty which increase the risk of poverty among people in vulnerable situations including older people;
 - EU Cohesion Policy Fund, notably to better address the specific situation of rural and/or remote areas, including the availability of new technologies.
 - The EPSR, given the importance of access to adequate housing for all, as well as social protection and social inclusion which are crucial to access housing.
 - EU initiative, policy and funding programme on health given that housing is a key parameter to enhance healthy ageing.
- Consider the recommendations included into the EP report on decent and affordable housing for all (2019/2187/INI).

Key reference documents

Council of the European Union

- [Conclusions on Mainstreaming Ageing in Public Policies](#) (March 2021)
- [Conclusions on Human-rights-based post-COVID-19 recovery](#) (Feb. 2021)
- [Conclusions on Human Rights, Participation and Well-Being of Older Persons in the Era of Digitalisation](#) (Oct. 2020)
- [Conclusions on The Economy of Wellbeing](#) (Oct. 2019)

Trio Presidency of the Council of the European Union

- [Trio Presidency Declaration on Ageing](#) (Dec. 2020)

European Commission

- [European Pillar of Social Rights](#)

United Nations

- [UN Decade of Healthy Ageing](#) (2021-2030)
- [UN Global Report on Ageism](#) (Mar. 2021)

AGE Platform Europe

- [AGE Barometer \(2019, 2020\)](#)
- [AGE Reports, open letters, press releases in relation to the COVID-19 pandemic](#)
- [AGE General guidelines on a human-rights based approach](#) (Nov. 2020)
- [AGE-Youth Forum joint op-ed on the generational blame game](#) (Nov. 2020)
- [AGE contribution to the European Pillar of Social Rights](#) (Nov. 2020)
- [AGE contribution to the EU Digital Education Plan](#) (Oct. 2020)
- [AGE reaction to EU Council Conclusions](#) (Oct. 2020)
- [AGE response to the consultation on the Employment Directive](#) (Sept. 2020)
- [Report of the Homes4Life Project](#) (May 2020)
- [Joint Press Release on a post-pandemic world built on intergenerational solidarity by AGE and the European Youth Forum](#) (April 2020)
- [Declaration by AGE General Assembly](#) (June 2019)
- [AGE-ROSEnet Seminar on reducing old-age social exclusion](#) (April 2019)
- [AGE Input to UN OEWG on Education, LLL, training, capacity building](#) (Feb. 2019)
- [AGE Input to UN OEWG on Autonomy and Independence](#) (Feb. 2019)
- [AGE summary of the new EU Strategy on Victims' Rights 2020-2025](#)
- [AGE summary on the climate crisis and older people](#) (2019)
- [AGE Contribution to the Pension Adequacy Report](#) (2018)
- [AGE response to EU consultation on passengers' rights](#) (2017)



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