

15 January 2018

MMM response to the European Commission Public consultation on a possible EU action addressing the challenges of access to social protection for people in all forms of employment in the framework of the European Pillar of Social Rights

Questionnaire

Providing access to social protection and related employment services for people in all forms of employment is crucial not only for the economic and social safety of the workforce, but also for well-functioning labour markets and economies that create quality jobs and sustainable growth. Yet, there are groups of employed who are left without sufficient access to social protection and related employment services. The Commission has identified and described relevant challenges in the background document.

Respondents to this questionnaire are recommended to read the background document before proceeding.

1. The background document identifies some challenges regarding social protection and related employment services.

Do you agree with the identification of the challenges outlined in the background document?

	I do agree	I rather agree	I rather do not agree	I do not agree	I don't know
Gaps in formal coverage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Gaps in effective coverage	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Insufficient transferability of rights	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Insufficient transparency of rights and	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regulatory complexity	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There are other challenges in access to social protection and employment services	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify:

200 character(s) maximum

Conditionality: changes to benefits requirements have resulted in lower take-up & widespread reduction of coverage, duration & adequacy of benefits

2. Social protection covers several benefits and services from unemployment benefits to long-term care, and employment services are connected to some of these benefits.

Which areas of social protection and employment services (listed below) do you consider to be relevant for a possible EU initiative promoting access?

2.1 for workers in non-standard forms of employment? (please choose max. 3 items on the list)

Social protection:

	High relevance	Medium relevance	Low relevance	Not relevant at all	Don't know
Unemployment benefits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sickness benefits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Benefits in respect of accidents at work and occupational diseases	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Old-age benefits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Invalidity benefits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Survivor's benefits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Maternity and equivalent paternity benefits	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Family benefits	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Health care	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Long-term care	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2.1 for workers in non-standard forms of employment?

Employment services:

	High relevance	Medium relevance	Low relevance	Not relevant at all	Don't know
Guidance, counselling and placement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Training and updating skills	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rehabilitation and re-insertion measures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2.2 for self- employed? (please choose max. 3 items on the list)

Social protection:

	High relevance	Medium relevance	Low relevance	Not relevant at all	Don't know
Unemployment benefits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sickness benefits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Benefits in respect of accidents at work and occupational diseases	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Old-age benefits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Invalidity benefits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Survivor's benefits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Maternity and equivalent paternity benefits	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Family benefits	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Health care	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Long-term care	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2.2 for self- employed?

Employment services:

	High relevance	Medium relevance	Low relevance	Not relevant at all	Don't know
Guidance, counselling and placement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Training and updating skills	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rehabilitation and re-insertion measures	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3. Some common principles could be promoted to help increase access to social protection and employment services to all people, regardless of their form of employment, and so foster upward social convergence in the EU. Do you think that the following general policy principles should be pursued by a possible EU initiative?

I do agree I rather agree I rather do not agree I do not agree I don't know

Regardless of the type and duration of their employment relationship, workers, and, under comparable conditions, the self-employed, have the right to adequate social protection;	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Tying rights to individuals as they work (and not to the contract) and making rights transferable;	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Making rights and related information transparent;	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simplifying administrative requirements.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
No action required	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

4. People in non-standard forms of employment and self-employed are facing gaps in formal coverage to social protection and their effective coverage is limited by rules of eligibility, low-levels of benefits, complexity of rules and the risk of under-insurance. Action to address gaps in access to social protection may be taken at EU, national and regional level.

4.1 Which avenues do you consider most appropriate to address the challenges of the gaps in formal and effective coverage by social protection?

4.1.1 for non-standard forms of employment

4.1.1.1 The social protection rights and obligations not yet formally covered

should: (Please choose only one answer from the list)

- be mandatory (for every kind of job, irrespective of the type of contract)
- be voluntary (for every kind of job where gaps exist, irrespective of the type of contract)
- be partly mandatory and partly voluntary (for every kind of job where gaps exist, irrespective of the type of contract)
- remain as they are (no action required)

4.1.1.2 What should be the level of protection in the case of rights not yet formally or effectively covered? (Please choose only one answer from the list)

- Mandatory protection and contributions aligned to the level of standard workers
- A minimum level of mandatory protection and contribution is defined for all people in employment
- Differentiated levels are defined
- Remain as it is (no action required)

4.1.1.3. What is the most appropriate way to ensure effective coverage? (Multiple answers possible)

- A single social protection scheme covering all people in employment
- Specific mandatory social protection schemes could co-exist and their qualification criteria, contribution rules and benefit calculation could be tailored to the specificities of each group
- Temporary and decreasing incentives for low income people in non-standard forms of employment to enable them to fully and/or effectively participate on a mandatory basis in social protection schemes.
- Access to unemployment benefits and employment services tied with activation measures for all people in employment, regardless of their employment contract
- Automatic enrolment with opt-out clauses
- Creation of voluntary schemes accompanied with better information and reduced administrative burden
- Tailoring better the qualification criteria, contribution rules and benefits' calculation of the voluntary schemes to the needs and specificities of each group
- Temporary and decreasing incentives for low income people in non-standard forms of employment to enable them to fully and/or effectively participate on a voluntary basis in social protection schemes
- Other

4.1.1.4 In your view, is there a need for EU-level action to ensure access to social protection and related employment services for people in non-standard forms of employment where gaps exist?

- Yes
- No
- I don't know

What elements from sections 4.1.1.1, 4.1.1.2 and 4.1.1.3 should be addressed by EU action?

500 character(s) maximum

What kind of EU policy instrument(s) would be most effective?

	Highly effective	Moderately effective	Low effective	Not effective at all	Don't know
Improve the implementation of the existing EU-level legislative framework	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Introduce new EU legislation (ex: Directive)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

- | | | | | | |
|--|----------------------------------|----------------------------------|----------------------------------|-----------------------|-----------------------|
| Introduce soft EU legislation to be adhered by MS on a voluntary basis (ex: Council recommendation) | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Strengthen EU level coordination and monitoring (e.g European semester, Social Open Method of Coordination, employment guidelines, benchmarks) | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Exchange of best practices | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| A combination of two or more of the above | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please specify

200 character(s) maximum

Soft legislation has been the tool used until now. The time has come to legislate and change the framework maybe in combination with best practices or soft law.

4.1 Which avenues do you consider most appropriate to address the challenges of the gaps in formal and effective coverage by social protection?

4.1.2 for self-employed not yet covered

4.1.2.1 The social protection rights and obligations should (Please choose only one answer from the list)

- be mandatory for all self-employed
- be voluntary for self-employed not yet covered
- be partly mandatory and partly voluntary
- remain as they are (no action required)

4.1.2.2 What should be the level of protection? (Please choose only one answer from the list)

- Mandatory protection and contribution aligned to the level of standard workers
- A minimum level of mandatory protection and contribution is defined for all people in employment
- Differentiated levels are defined for self-employed according to their specific needs
- Remain as it is (no action required)

4.1.2.3 What is the most appropriate way to ensure effective coverage? (Multiple answers possible)

- A single social protection scheme could be envisaged to cover all people in employment

- Specific mandatory social protection schemes could co-exist and their qualification criteria, contribution rules and benefit calculation could be tailored to the specificities of each
- The choice of contributing to a public or private insurance scheme is left open to self-employed as long as they are part of an insurance scheme which would protect them in case of need
- Temporary and decreasing incentives for low income self-employed to enable them to fully and/or effectively participate on a mandatory basis in social protection schemes
- Access to unemployment benefits and employment services tied with activation measures
- Automatic enrolment with opt-out clauses
- Creation of voluntary schemes accompanied with better information and reduced administrative burden
- Tailoring better the qualification criteria, contribution rules and benefits' calculation of the voluntary schemes to the needs and specificities of each group
- Temporary and decreasing incentives for low income self-employed to enable them to fully and/or effectively participate on a voluntary basis in the social protection schemes
- Other

4.1.2.4 In your view, is there a need for EU-level action to ensure access to social protection for self-employed where gaps exist?

- Yes
- No
- I don't know

What elements from sections 4.1.1.1, 4.1.1.2 and 4.1.1.3 should be addressed by EU action?

500 character(s) maximum

What kind of EU policy instrument(s) would be most effective?

	Highly effective	Moderately effective	Low effective	Not effective at all	Don't know
Improve the implementation of the existing EU-level legislative framework	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Introduce new EU legislation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Introduce soft EU legislation to be adhered by MS on a voluntary basis (ex: Council recommendation)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen EU level coordination and monitoring (e.g European semester, Social Open Method of Coordination, employment guidelines, benchmarks)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exchange of best practices	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
A combination of two or more of the above	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify

200 character(s) maximum

4.2 Transferability and transparency of social protection rights could help to ensure secure labour market transitions. Which avenues do you consider most appropriate to address those gaps?

	Highly appropriate	Moderately Appropriate	Low appropriate	Not appropriate at all	Don't know
Stipulating minimum standards for timely acquisition, preservation and transferability of social protection and employment service rights	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Creation of individual accounts for social protection and/or employment service rights (in order to avoid losses of social entitlements when changing jobs)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simplifying administrative procedures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

4.2.1 If your response is highly or moderately appropriate, is there a need for EU-level action?

Yes No I don't know

- Stipulating minimum standards for timely acquisition, preservation and transferability of social protection and employment service rights
- Creation of individual accounts for social protection and/or employment service rights (in order to avoid losses of social entitlements when changing jobs)
- Simplifying administrative procedures

If yes, what kind of EU policy instrument(s) would be most effective?

- | | Highly effective | Moderately effective | Low effective | Not effective at all | Don't know |
|--|----------------------------------|----------------------------------|----------------------------------|-----------------------|-----------------------|
| Introduce new EU legislation | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Introduce soft EU legislation to be adhered by MS on a voluntary basis (ex: Council recommendation) | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Strengthen EU level coordination and monitoring (e.g European semester, Social Open Method of Coordination, employment guidelines, benchmarks) | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Exchange of best practices | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| A combination of two or more of the above | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please specify

200 character(s) maximum

-

4.3 The background document identified gaps in access to employment services for some groups. Which avenues do you consider most appropriate to address the challenges of the gaps in access to employment services?

- | | Highly appropriate | Moderately Appropriate | Low appropriate | Not appropriate at all | Don't know |
|---|----------------------------------|------------------------|-----------------------|----------------------------------|-----------------------|
| Access to employment services for workers should be ensured, irrespective of type of contract, and for self-employed | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Some social protection benefits should be bound to the participation in specific | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |

employment related programmes.

4.3.1 If your response is highly or moderately appropriate, is there a need for EU-level action to ensure that rights and obligations to employment services are voluntary where gaps exist?

- Yes
- No
- I don't know

If yes, what kind of EU policy instrument(s) would be most effective?

	Highly effective	Moderately effective	Low effective	Not effective at all	Don't know
Improve the implementation of the existing EU-level legislative framework	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Introduce new EU legislation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Introduce soft EU legislation to be adhered by MS on a voluntary basis (ex: Council recommendation)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen EU level coordination and monitoring (e.g European semester, Social Open Method of coordination, employment guidelines, benchmarks)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exchange of best practices	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
A combination of two or more of the above	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify:

200 character(s) maximum

Soft legislation has been the tool used until now. The time has come to legislate and change the framework maybe in combination with best practices or soft law.

5. According to your assessment, the impact of making social protection rights mandatory in all forms of employment would be positive, neutral or negative for

	positive	neutral	negative
The European society: Cohesion in society	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The European society: Intergenerational justice	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The labour market: Labour market transitions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The labour market: Transparency	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The economy: Competitiveness	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

The economy: Resilience and adaptability	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The economy: Economic growth	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The workers: Security of workers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The workers: Investment in people and their skills	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Social protection and public finances: Financial sustainability of social protection systems	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Social protection and public finances: Adequacy of social protection benefits and services	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Social protection and public finances: Public budget	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Small and medium sized enterprises: Cost	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Small and medium sized enterprises: Competition	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

5.1 In your opinion, what is the most important positive and negative impact of making social protection rights mandatory in all forms of employment?

400 character(s) maximum

Making social protection rights mandatory for all forms of employment would prevent situations of discrimination and abuse, while fostering transparency and promoting a level playing field both among workers and companies. It will be positive to promote female entrepreneurship as currently being self-employed penalises women and therefore they prefer to have employee status.

6. According to your assessment, the impact of making social protection rights voluntary where gaps currently exist would be

	positive	neutral	negative
The European society: Cohesion in society	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The European society: Intergenerational justice	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The labour market: Labour market transitions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The labour market: Transparency	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The economy: Competitiveness	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The economy: Resilience and adaptability	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The economy: Economic growth	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The workers: Security of workers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The workers: Investment in people and their skills	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Social protection and public finances: Financial sustainability of social protection systems	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Social protection and public finances: Adequacy of social protection benefits and services	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Social protection and public finances: Public budgets	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Small and medium sized enterprises: Cost



Small and medium sized enterprises: Competition



6.1 In your opinion, what is the most important positive and negative impact of making social protection rights voluntary where gaps currently exist?

400 character(s) maximum

Making social protection rights voluntary would fail to reach the goals set by this initiative, i.e. ensure effective access to social protection for all workers, notably the most vulnerable ones, women in part-time, temporary work etc.

7. If you have any additional comments and/or suggestions, feel free to use the open answer box below.

1500 character(s) maximum

This initiative should be complemented with:

1. universal non-discriminatory access to social protection and services for all including caregivers (who are mainly women) who provide informal care and end up in poverty in old age: Access to adequate non-work-related benefits - including old-age, invalidity, maternity and family benefits - and quality services - including care, social, health, housing, education and life-long learning services – must be ensured to all people in society, including those not in employment.
2. Legally recognize unpaid family care work as being a particular category of work that gives status and rights to caregivers. Consider Mothers and other caregivers as “active” and give them access to social protection or implementation of a Social Protection Floor, education and training, care credits in pension calculation, etc.)

8. If you wish please send your written contribution to EMPL-ACCESS-SOCIAL-PROTECTION-OPC@ec.europa.eu