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closing gaps in European social citizenship

***The politics of minimum income schemes reforms
in seven European countries***

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- ii) to engage with relevant communities, stakeholders and practitioners in the research with a view to supporting social protection policies in Europe. Contributions to a dialogue about these results can be made through the project website euroship-research.eu, or by following us on Twitter: @EUROSHIP_EU.

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Table of Content

1	Introduction.....	4
2	Literature review and analytical framework.....	4
3	Policy development and political dynamics of MIS in seven European countries.....	7
3.1	Norway.....	7
3.1.1	Policy development.....	7
3.1.2	Political dynamics.....	8
3.2	Germany.....	9
3.2.1	Policy development.....	9
3.2.2	Political dynamics.....	11
3.3	Hungary.....	12
3.3.1	Policy development.....	12
3.3.2	Political dynamics.....	13
3.4	Estonia.....	14
3.4.1	Policy development.....	14
3.4.2	Political dynamics.....	15
3.5	United Kingdom.....	16
3.5.1	Policy development.....	16
3.5.2	Political dynamics.....	17
3.6	Spain.....	18
3.6.1	Policy development.....	18
3.6.2	Political dynamics.....	19
3.7	Italy.....	21
3.7.1	Policy development.....	21
3.7.2	Political dynamics.....	22
4	Acknowledgment.....	24
	References.....	24

1 Introduction

In European countries, Minimum Income Schemes (MIS) – intended as non-contributory, means-tested monetary benefits for working age individuals aimed to reduce poverty and social exclusion – constitute key last-resort safety nets against the risk of poverty and social exclusion. However, extensive variation appears in the design, function, institutional architecture, benefits and conditionality mechanisms of MIS across countries in Europe (Jessoula, 2021; Panaro *et al.*, 2022; Raitano *et al.*, 2021; European Commission 2022a; European Commission 2022b).

Against this backdrop, this report aims at providing an interpretation of the distinct policy trajectories in the field of minimum income in seven selected countries – Norway, Germany, Hungary, Estonia, Spain, Italy and the UK. Building on the theoretical framework elaborated by Natili (2019), this report sheds light on 1) actor constellations 2) lines of conflicts and 3) the political dynamics behind major MIS reforms in each of the selected countries.

The rest of this paper is organised as follows. Section 2 provides a review of the main contributions in the field of MIS and discusses the theoretical framework elaborated by Natili (2019). In doing so, we reflect upon the definition and main features of *socio-political demand* and *political supply*. While the former is conditional on the position and strength of social actors, such as trade unions, faith-based organizations and social movements, the latter depends on the position of political parties and the structure of the party system. The interaction between socio-political demand and political supply will eventually determine distinct political dynamics and, ultimately, “political exchanges”. Section 3 instead provides an in-depth analysis of the policy trajectories and political dynamics of MIS in each of the seven selected countries in the last two decades.

2 Literature review and analytical framework

Historically, the origins of MIS date back to the end of the Golden Age period (1945-1975), when major anti-poverty benefits lost their discretionary and ad hoc nature to become fully fledged enforceable social rights (Ferrera, 2005; Natili, 2020). Yet, until the beginning of the new century, these schemes remained quite marginal in the architecture of the welfare state as they served as “a residual layer of social support for those exceptional cases not covered by universal or insurance-based social protection programmes” (Natili, 2020, p. 59). Their main function was to provide (limited) income support and assist individuals against the risk of poverty and social exclusion.

In recent decades, on the one hand, the “new social risks” emerged with the socio-economic transformations associated with post-industrial societies (Bonoli, 2005) have revealed the limits and the gaps of traditional social insurance programs; on the other, the latter were retrenched

due to cost containment “imperatives” in the dominant neoliberal “austerity” framework, (Clegg, 2014). As result, the relevance of means-tested minimum income programmes has increased considerably across Europe to the point that anti-poverty programmes currently constitute the so-called “third generation” of social assistance programmes in most countries (Kazepov, 2010).

Despite increasing relevance however, MIS still vary considerably across Europe. Many contributions in fact show that functional pressures (i.e. distinct levels of poverty and social exclusion) do not provide an explanation regarding variation in the structure, scope and function of MIS across European welfare state (Jessoula *et al.*, 2014; Kevins, 2015; Lalioti, 2016; Natili, 2019). Instead, more attention should be paid to the political dynamics, which typically filter ongoing functional pressures.

Building on these studies, this paper reconstructs MIS policy trajectories in the last two decades and provides a preliminary interpretation of the latter by looking at the political dynamics in the field. The *explanandum* is captured along two main analytical dimensions (cf. table 1). First, we reconstruct the national policy trajectories of MIS distinguishing between *expansionary* reforms, *retrenchment* and *stability*. Second, we identify whether a turn towards *activation* and *conditionality* is observable; also, where possible, we distinguish between “positive” activation (i.e. less conditionality, more incentives to work, more enabling services) versus “negative” activation (stricter conditionality, workfare approach).

Table 1. Politics and policy development of minimum income schemes

<p style="text-align: center;">Explanans: Politics</p>	<p style="text-align: center;">Explanandum: MIS trajectory 2000-2022</p>
<p>1. Political dynamics <i>1.1. Socio-political demand:</i> (Trade Unions, Employers’ Associations, CSOs, social movements, voters) <i>1.2. Political supply</i> (Political parties & party system)</p>	<p>Policy SQ ante & change 1. Expansion-Stability-Retrenchment <i>Institutional: Eligibility – Benefit level</i> <i>Outcome: Coverage - Expenditure</i> 2. Activation & conditionality <i>Negative activation</i> <i>Positive activation</i></p>

Source: Authors’ elaboration

In order to understand and explain the scope and the direction of MIS reforms, this paper relies on the analytical framework developed by (Natili, 2019), arguing that MIS trajectories may be well interpreted by focusing on political exchange dynamics. In particular, the author looks at different types of *credit-claiming dynamics* – namely *contentious* or *non-contentious* – resulting from the interplay between socio-political *demand* (interest groups and voters) and political *supply* (political parties) in order to interpret MIS trajectories.

In more detail, with regard to the demand side, the existing literature points at a limited public support for targeted social assistance benefits mostly due to the *absence of reciprocity* - i.e. the asymmetry between contributors and beneficiaries - and the *limited political resources of beneficiaries*, i.e. the poor are generally few, they participate less in politics and they are unlikely to organize themselves into pressure groups (Bonoli, 2005; Clegg, 2014; Natili, 2018). However, studying the role played by relevant interest groups, Natili (2019) argues that although the beneficiaries of means-tested benefits are generally politically weak, under certain conditions powerful interest groups such as trade unions, faith-based organizations and social movements may organize a demand for minimum income protection. Importantly, Natili (2019) argues that depending on the preferences and strength of social actors, socio-political demand may be:

1. **Latent**: when functional pressures that are not represented in the group arena;
2. **Weak and divided**: when social actors do not agree on this issue, with some supporting MIS introduction and/or expansion and others opposing it.
3. **Strong**: when powerful social groups mobilise in a united front in order to introduce and/or strengthen MIS.

On the supply side, the focus is on *party system properties* and *competitive dynamics*. Regarding the first, scholars focus on the possible presence of different political cleavages – namely, Church-State, Centre-Periphery and Labour/Capital – which may activate multiple lines of conflict regarding MIS (Madama, 2010; Jessoula *et al.*, 2014; Natili, 2019). In more details, studies show that the presence of conservative and Christian democratic parties is expected to hinder the introduction and/ or expansion of MIS, supporting instead traditional solidarity networks and community-based welfare institutions (Madama, 2010). Similarly, the activation of the centre-periphery cleavage may impede the introduction and/ or expansion of national MIS, because such schemes would result in redistribution of resources from rich to poor regions (Jessoula *et al.*, 2014; Natili, 2019). Along the labour/capital cleavage, in line with Natili’s framework, as it will be discussed in more detail below, we move beyond the simplified assumption that the left-wing parties support welfare redistribution whereas right-wing parties oppose it, arguing that in order to better explain the scope and direction of reforms we need to look at party competition and coalition building dynamics (Natili, 2019).

Moving to the second dimension, scholars suggest that also the type and “direction” of party competition is key to explain policy trajectories (Ferrera *et al.*, 2012; Picot, 2012) including minimum income reforms (Natili, 2019; Jessoula and Natili, 2020). In fact, the expected policy preferences of political parties cannot be theorized isolated from the context in which they compete; rather it is conditional on the interaction with institutions and rival parties with which they are confronted. In particular, Natili (2019) argues that policy output may depend on coalitional strategies and power balances between different parties. More specifically, parties may adjust their position on social policy issues to the position of a potential coalition partner

if that partner is pivotal for forming a coalition government (Häusermann *et al.*, 2013). Therefore, the configuration of party competition is decisive for politicians' calculations on whether (or not) to engage in social policy reforms and thus, avoiding the blame for unpopular reforms (Kitschelt, 2001). Actually, focusing on within-camps competition, Jessoula and Natili (2020) argue that competition within the right camp may be detrimental to the expansion of minimum income schemes, as right parties may find it convenient campaigning against these benefits in order to differentiate themselves from other right parties. Similarly, building on Garay (2016), they argue that the emergence of a new left-wing party competing for outsiders' votes may be decisive to the expansion of innovative anti-poverty measures (Jessoula and Natili 2020).

In fact, considering these two dimensions, Natili (2019) differentiates between two types of party systems: "moderate pluralism" and "fragmented pluralism". While the first type is characterised by only one political cleavage and a limited amount of within-pole competition, the latter is characterized by both multiple cleavages – beyond the traditional left–right dimension – and the presence of within-camps competition (Ferrera *et al.*, 2012; Picot, 2012).

Building on this analytical framework, the empirical section reconstructs the political dynamics to explain the MIS policy trajectories in the seven selected countries.

3 Policy development and political dynamics of MIS in seven European countries

3.1 Norway

3.1.1 Policy development

The Norwegian welfare state is broad and generous, and the social assistance (SA) minimum income scheme constitutes the second tier of a 2-tier system against the risk of unemployment. The first tier is the contributory unemployment insurance (UI). As argued by Halvorsen *et al.*, (2021), when contributory social insurance schemes expanded, MIS became a residual, "last-resort" safety net for the poor.

Until the mid-2000s no major reforms were adopted in the field of MIS. In 2004 the **Christian-Democratic coalition government** adopted the "Introductory Programme" (IP) (*introduksjonsprogrammet*), in parallel with the "Introduction Benefit" (*introduksjonsstønad*). In 2007 the centre-left coalition made up by the Socialist Left party and the Labour party introduced the "Qualification Program" (QP) The QP aims to reduce welfare dependency of social assistance recipients as it targets persons whose work ability or the ability to obtain an independent income from paid work is 'considerably reduced'. The program in particular allows

the beneficiaries to enter the labour market after completion of a one-year full-time programme, with the possibility of extension. The IB instead addresses the specific needs for improved labour market qualifications of newly arrived refugees – and their reunited family members. Similar to the QP, the IB is more generous than the ordinary MIS and is managed and financed by municipalities.

In December 2014, the conservative government pushed towards stricter activation requirements for social assistance recipients and, eventually in 2017 the Parliament introduced *mandatory activation* through active labour market programs (ALMPs) for social assistance beneficiaries below 30 years of age.

In brief, the MIS reforms adopted in the last three decades several reforms suggest that Norway moved towards *limited expansion* of the anti-poverty safety net – via the introduction of the two narrow additional schemes and modest benefit increases – as well as *increased activation* – through different strategies and tools.

3.1.2 Political dynamics

For many years the party system in Norway was characterised by a rigid two-bloc system. Yet, recent political changes transformed it from a ‘balanced two-bloc’ system to a ‘diffused’ party system, where there are many parties and none of them is decisively superior to others (Heider 2005).

Within this context, the dominant ideology across the entire political spectrum had long been that social assistance is not a good instrument to lift people out of poverty in Norway. Instead, reliance on social assistance should be temporary and only be used as the very last resort to cover basic living costs when no other source of income is available (Halvorsen et al. 2023).

Between 1997 and 2005, the Christian-Democratic coalition government led by the Prime Minister Bondevik in fact paid only marginal attention to MIS as the political debate about poverty prevention was generally centred on how to prevent individuals from ending up on social assistance.

It was only in the early 2000s that members of parliament from distinct political parties began to raise awareness on the need to alleviate poverty in Norway. For the Socialist Left Party and the Red Party (the former Communist Party), the focus on poverty served to criticize the Labour and the Conservative Party for not doing enough for those in need of help and assistance outside the labour market. For the Conservative Party, a focus on poverty has served as criticism of the Labour Party for failing to adopt efficient policy measures and failing to make priorities.

The renewed focus on poverty sparked a discussion on whether Norway had the right combination of policy measures in place. A particular concern was that with the increasing share of immigrants among social assistance recipients. By the mid-2000s in fact, immigrants were overrepresented among long-term recipients of social assistance (Gaasø 2005¹, Hirsch 2010²).

Against this backdrop, in 2004 the Christian-Democratic coalition government adopted a new “Introduction Programme” targeting newly arrived immigrants and refugees who needed to learn new basic skills. Parallel to this, the Socialist Left party continued criticizing the Christian-Democratic coalition government for causing increasing poverty in Norway, and poverty became a hot topic in the 2005 election campaign to the Norwegian Parliament.

As a result of the elections, a centre-left coalition government (2005-2009) came into power, headed by the Labour Party. During the negotiations of the government platform, discussions emerged between the Socialist Left Party, on the one side, and the Labour Party and The Centre Party, on the other side, about the social assistance scheme (Soria Moria 2005³). While the Labour Party and The Centre Party believed social assistance benefits should be kept low to avoid disincentives to find paid work, the Socialist Left Party wanted to increase the benefit level (*Aftenposten*, 28 September 2005). Eventually, the Minister of Labour and Social Affairs, Bjarne Håkon Hanssen (Labour Party), stated that he would have no mercy with people on benefits who did not sign an activation contract (*Dagbladet* 9. November 2005). The statement created considerable protests in the mass media, particularly from the Socialist Left Party (e.g. *Aftenposten*, 2006-01-22).

However, despite a mobilization of trade unions and civil society organizations claiming for the introduction of stronger and more generous standards of social assistance benefits, the strengthening of activation and conditionality measures with the 2007 Qualification Programme did not find any opposition in the political arena (Halvorsen *et al.* 2023). As a result, in 2015 the Norwegian parliament prepared stricter enforcement of conditionalities, while in 2017 the conservative government imposed participation in active labour market policy measures as a mandatory requirement for receiving social assistance, unless grave personal circumstances applied (Grødem, 2016)⁴. The new legal regulation concerns people under the age of 30 years old.

3.2 Germany

3.2.1 Policy development

¹ [Mest hjelp til å etablere seg - SSB](#)

² [Sosialhjelpsmottakere blant innvandrere 1999-2002, 2005-2008 \(ssb.no\)](#)

³ [allerallersiste \(regjeringen.no\)](#)

⁴ <https://www.regjeringen.no/no/tema/pensjon-trygd-og-sosiale-tjenester/innsikt/sosiale-tjenester/okonomisk-sosialhjelp/id570200/>

Until the early 2000s, the minimum income scheme in Germany was restricted to unemployable persons without substantial or continuous work experience and offered them a social benefit based on a means-tested flat-rate payment. In 2005 however, the governing left-wing coalition of the Social Democratic (SPD) and the Green Party (Die Grünen) introduced a path-breaking reform, the so-called 'Hartz-IV' legislation in Social Code II ("Zweites Sozialgesetzbuch", SGB II), which shifted the welfare state architecture in the field of unemployment and social assistance from a 3-tier to a 2-tier system, combining a reform of MIS with a reform of unemployment policies and public unemployment insurance (Eggers et al. 2022).

In a nutshell, the Hartz-IV reform extended the flat rate means-tested MIS to major parts of the long-term unemployed, who were no longer eligible for wage-related unemployment benefits of the insurance scheme, now called Unemployment Benefit I (UBI). Instead, a far greater part of the unemployed became only eligible for the new MIS, called Unemployment Benefit II (UBII). More broadly, the UBII targets working aged people (between 15 and 65/67 years old), individuals who are in need of support, capable to work at least 3 hours per day, including persons living with the claimant in a joint household ("*Bedarfsgemeinschaft*"). The UBII provides cash benefits to legal residents/individuals who pass a strict means-test – the latter taking into consideration assets (with some limitations, e.g., cars, capital allowances EUR 10.500 per adult, retirement savings of up to EUR 13.000 per joint household) and income, as well as social transfers. Importantly, in order to avoid 'inactivity traps', the scheme also allows the payment of 'in-work benefits', in that marginal income from work is disregarded in the means-test.

After the Hartz-IV reform, activation measures for the unemployed covered by the UBII program were based on a relatively strict *work-first approach* that prioritized the return of unemployed people to the labour market. Recipients of UBII are nowadays forced to both accept any job offer (with a maximum of 2.5 commuting hours per day) and participate in 'workfare' programmes used as 'working tests' with no regular wages (i.e. "1-Euro-jobs"). If claimants do not comply with the principles of availability and suitability (e.g. they refuse or resign from a work offer, work program/activation measure), they can be sanctioned and their benefit can be reduced by either 30, 60 or 100% of the standard UB II amount for three months. In case of no compliance, families with children are only eligible to receive benefits in-kind.

More recently, in light of the negative consequences of the COVID-19 crisis, a new debate around the UBII program has emerged and a series of amendments were adopted. These include the temporary relaxation of eligibility criteria to allow more people to access the benefit (i.e. temporary suspension of non-substantial assets requirements) (European Commission 2022b).

According to Grages *et al.*, (2020) then, since the introduction of the Hartz-IV, only moderate changes in the field of MIS have taken place, thereby MIS trajectory in Germany represents a case of stability as no major reforms in this field have been implemented since 2005.

3.2.2 Political dynamics

All parties in the German Parliament voted for the Hartz-IV reform. These included both the centre-left governing parties – the Social Democratic party (SPD) and the socio-ecological party (Bündnis 90/Die Grünen) – and the two major opposition parties – the Christian Democratic party (CDU/CSU) and the Free Democratic party (FDP).

Despite such broad support coalition, the introduction of the Hartz-IV legislation was confronted with protests from distinct social actors. In particular, the German Welfare Association (*Paritätischer Wohlfahrtsverband*) and the Caritas, together with the German Trade Union Confederation (*Deutscher Gewerkschaftsbund*, DGB) and the United Services Trade Union (*Vereinte Dienstleistungsgewerkschaft*, Verdi) openly campaigned and mobilized in actions of a broader social movement against the Hartz-IV, like the “Monday-demonstrations”.

Following the inconclusive results of the 2005 German federal election, a grand coalition was eventually formed by the SPD and the CDU/CSU. The new government started several initiatives towards benefits retrenchment and tightened conditionality of UBII. During this period (2005-2009), the socio-political demand remained rather strong, advocating for higher benefit amount and lower conditionality, while the main employers’ association (*Arbeitgeberverband*) forcibly supported the introduction of more restrictive measures.

Importantly, the decision of the SPD to sustain new measures aiming at reducing benefits and strengthening conditionality requirements contributed to a loss of its left-wing members – about 100.000 members left the SPD – which joined the left WASG/PDS, eventually becoming the basis for the new party “Die Linke” in 2007. Even if the loss of substantial parts of its left-wing clearly has weakened the SPD, this fragmentation also strengthened the power of the right-wing members within the SPD and contributed to a shift in the party system from a four- to a five-party system.

The new government (2009-2013) formed by the conservative CDU/CSU and the liberal FDP continued with more conditionality measures. However, the socio-political demand remains quite strong, with social actors mobilizing against the low level of benefits in UBII. More importantly, trade unions and civil society organizations incentivise beneficiaries of the UBII to go to the Social Court and claim for an unconstitutional judgment against the low level of benefits (Eggers et al. 2022).

It turned out that the Federal Constitutional Court proved to be relevant actors in influencing policy decisions over MIS. In particular, in 2010 the Constitutional Court, on demand of the

Federal Social Court of Hesse, decided that the UBII had to be increased, because it did not fulfil the requirements of a subsistence-covering benefit, in general, and for children aged 7-14, more specifically.

Following Courts' decision, the conservative CDU/CSU and the liberal FDP introduced some minor reforms on UBII. These include a minor increase of the UBII, in general, and of the share of the benefits for children, and the introduction of the 'educational' package with 10 EUR/month.

These decisions, however, were strongly criticised by some actors. In particular, civil society organizations and the left-wing members of the SPD argued that both the benefit increase and the educational package were far too low, and the procedures for the application were too complex (Eggers et al. 2022).

More recently, in response to the Covid-19 pandemic, a new debate around the UBII program has emerged and the new coalition government formed by SPD, Die Grünen and FDP temporary relaxed eligibility requirements in order to increase access to MI benefits.

3.3 Hungary

3.3.1 Policy development

In the early 2000s, in Hungary there were three types of benefits which working age people were entitled to, on an individual basis: 1. the earnings-related unemployment allowance (*munkanélküli járadék*); 2. the fixed-amount unemployment benefit (*munkanélküli segély*). 3. the fixed- amount regular social assistance (*rendszeres szociális segély*) for the long-term unemployed.

Between 2006 and 2021 three major reforms in the field of social assistance took place. A first reform was adopted in 2006 by the MSZP-SZDSZ government – a coalition between the socialists and the liberals. The 2006 reform introduced a *de facto* MIS, where benefits were shifted from the individual to the family level for both eligibility conditions and benefit amounts. Additionally, the regular social assistance benefit was not a fixed amount anymore, but it complemented an equalized household income to a fix threshold set at 90% of the minimum pension level. This decision implied a major increase of benefit levels, which raised to an estimated monthly EUR 300, according to Ferge et al. (2013).

A second major reform was the introduction of the 2009 "Pathway to Work" (*Út a munkához*) programme, which increased conditionality of access to social assistance. In particular, the 2009 reform, launched by the second MSZP-SZDSZ government, differentiated between persons capable and incapable of work: the formers could be involved in public work or, in case of lack of employment, they were entitled to the newly introduced 'availability support' benefit

(*rendelkezésre állási támogatás*). Additionally, between 2009 and 2010, the MSZP-SZDSZ government reduced benefit levels (i.e. lowering the maximum of the eligible amount) and increased conditionality, *de facto* return to individual entitlement (Gàbos and Tomka 2022).

The latest major reform was introduced in 2015 by the right-wing national conservative Fidesz-KDNP government, which restructured some of the competences among the national, district and local governmental level authorities: income replacement benefits, with the exception of the nursing fee, shifted from national to district-level (although eligibility conditions remained regulated at the national level), while expense compensating benefits became local-level competences. Furthermore, a new type of benefit, called “local social benefit” (*települési támogatás*) was introduced and provided by the local government with the aim to compensate for various expenditures (housing, public health services, etc.).

Overall, in the last decades the policy trajectory of MIS in Hungary has turned towards *retrenchment* (i.e. reduced benefit levels) and *negative activation*.

3.3.2 Political dynamics

The Hungarian political system, also due to the voting procedure, has long been very stable⁵. There is a multiparty system, swinging to some extent between moderate and fragmented pluralism. According to Soós (2012), between 1990 and 2010 the Hungarian party system was characterised by moderate pluralism (elections every four years, five in total, 4 to 6 parties in the Parliament) and a two-block system.

Looking at the political dynamics more closely, the 2006 introduction of the MIS (switching from individual to family level) was supported by a coalition of social policy experts, technocrats, and high-level governmental politicians of the socialist party (MSZP). Importantly however, a strong political support came from the Prime Minister which made the successful implementation of MIS possible.

Against this backdrop, the lack of a wide political support within the socialist party and in the electorate led to the introduction of small amendments in the opposite direction of the reform (i.e. lowered maximum of the eligible amount and increased conditionality), already within the next term of the MSZP-SZDSZ government (2006-2010).

A major breaking point in the Hungarian political landscape were the 2010 elections. These elections in fact ended the two-block system, as the two major left-wing parties either collapsed (MSZP) or completely disappeared (SZDSZ), while two newly formed and anti-

⁵ According to Enyedi and Casal Bértoa (2010), the Hungarian party system was the most institutionalized and stable one in Central-Eastern Europe.

establishment parties (LMP and Jobbik) passed the electoral threshold and entered the parliament.

Eventually, the landslide victory of right-wing Fidesz in 2010 and their sustained qualified majority in the next three elections led to a shift towards a *workfare approach* in the field of unemployment and social assistance.

According to both Fidesz's 2010 election party program, the main priorities of the government were the balance of public finances and the increase in financial sovereignty and economic activity. Consequently, Fidesz-led governments approach in the field of unemployment and social assistance heavily rely on earning-related benefits and had a preference for in-kind provisions instead of cash benefits for the low income and high poverty risk social groups. Importantly, socio-political demand was rather strong until 2010 as major pressures towards the 2006 and 2009 reform came from trade unions and expert-level bureaucrats. Yet, since 2010 the influence of social actors over social policy decisions was gradually weakened (Gàbos and Tomka 2022).

3.4 Estonia

3.4.1 Policy development

The Estonian welfare state architecture in the field of unemployment and social assistance is built on a 3-tier system. The Unemployment Insurance scheme (UI), based on strict eligibility conditions, and a duration between 180 and 360 days, represents the first tier. The second tier is constituted by the Unemployment Allowance (UA) having a duration of 270days. The third tier is the Subsistence Benefits, which remains residual and not particularly generous, currently conceptualized as “temporary benefit to alleviate material deprivation of persons and families” (Unt et al. 2021:19).

The national MIS, so-called “Subsistence Benefit” (SB), was established in 1995, with the adoption of the Social Welfare Act. The eligible unit for MIS application is household living and functioning together usually at the same location (address) based on population register. The scheme is organised and financed centrally, but benefits are allocated by local governments where the household is registered and renewed on a monthly basis. The benefit amounts vary depending on household composition, income and housing expenses, but do not depend on belonging to a specific group.

From 1995 to 2018, there has been no major reforms of the SB, with the expectation of (1) the use of threshold values and weights assigned to each household member; (2) the inclusion of certain types of household income as part of benefit calculation; (4) the definition of dwelling cost; and (4) other administrative aspects related to the MIS.

Interestingly, in 2017, a national debate was prompted on both the potential unfairness and ineffectiveness of conditionality measures and negative sanctions for the most disadvantaged individual. As a consequence, in 2018, the Estonian Government (through the Ministry of Social Affairs) introduced a MIS reform with the goal of increasing the effectiveness of MIS in addressing poverty and social exclusion. The 2018 reform relaxed eligibility criteria (particularly for families with children), increased monetary support and thresholds for households in need, and introduced both positive (i.e. additional support for those who participate in ALMP measures, provision of supportive social services, and flexibility in entitlement even after the (re)entering the labour market) and negative (i.e. reductions in benefit levels for recipients who do not follow workfare requirements or refuse supportive social services) activation measures.

In a nutshell, the trajectory of the Estonian MIS in the last two decades can be described as *limited expansion* – by increasing generosity and relaxing eligibility criteria – as well as activation through a peculiar combination of *positive and negative incentives*.

3.4.2 Political dynamics

Similar to other CEE countries, Estonia is a case of “chained democracy”, characterized by intergovernmental relations where local authorities’ discretion is protected by the constitution, and they are financially dependent on distribution of resources from state (Unt et al. 2023). As such, local authorities have a crucial role in implementing the MIS and have both political and administrative power in adapting the MIS as well as responsibility to find additional local (financial) resources for means-tested poverty alleviation at local level. Furthermore, the Estonian Social Insurance Board’s (a state institution, subsidiary of the Ministry of Social Affairs) is only involved in monitoring local authorities’ actions, without any political or administrative power in the field of MIS.

Historically, trade unions have played an important role in negotiating minimum wage levels and have acquired a crucial role also in the field of poverty and social exclusion. In particular, since the early 2000s, trade unions have mobilized to affect MIS generosity. At the same time, municipalities and/or the NGO Association of Estonian Cities and Municipalities are always involved in the decision-making process concerning new regulation administered locally – including MIS. However, it should be emphasised that Estonia faith-based organisations have only incidental minor roles as actors in welfare state politics or service provisions, in general.

Against this backdrop, since early 2017 a national debate over the reform of the Estonian MIS has emerged. In particular, the Ministry of Social Affairs started a series of consultations with local stakeholders’ organizations, such as representatives of local governments (LGs), local NGOs and professionals (social workers). Consequently, the Ministry of Finance was thrust

upon the Ministry of Social Affairs, which, together with the Ministry of Social Protection and the Ministry of Health and Labour, came up with a proposal on how to reform national MIS.

Importantly, it should be pointed out that Estonia has not had traditional left-right wing party politics since the collapse of the Soviet Union (Saarts, 2017). Since the early 1990s, the Estonian Parliament has represented approximately five political parties, which renders Estonia a case of moderate pluralism.

Against this backdrop, according to Unt et al. 2022, the 2018 MIS was the result of both functional pressures – *“The need for MIS reforms depends on the economic situation in society”*. (Political party) – and a strong socio-political demand where local NGOs, governments and professionals collaborated together with the Ministry of Social Affairs to reform the national MIS – *“There was indications that we should not do all the time small changes here and there, but collect these needs for changes and should do them at once”* (Ministry of Social Affairs).

3.5 United Kingdom

3.5.1 Policy development

In the United Kingdom, anti-poverty measures are non-contributory social assistance, child and housing benefits. Entitlement is linked and adjusted to any in-work earnings, however small. Both income streams and anti-poverty benefit entitlements are all managed and evaluated under one single Universal Credit (UC) system.

Introduced in 2013, UC has been one of the most important changes to welfare provision in the UK since 1945. It consolidated a range of social policies to address poverty by simplifying the application and payment of these under one government department (the DWP). Six so-called “legacy benefits” may be included in the UC payment: Jobseekers Allowance, Employment and Support Allowance, Income Support, Housing benefit, Child Tax Credit, and Working Tax Credit.⁶ Through the claimant commitment, UC attempts to ensure that those on reduced hour contracts spend their remaining working time looking for work (Larkin, 2018: 124). UC was designed to adjust automatically where incomes fluctuate, responding to the needs of our changing labour market. These measures were intended to help claimants budget and ready themselves for the world of work.

Since 2013, state support for MIS has been scaled back in the national priorities (Lambie-Mumford & Green, 2017: 273-4) and only new measures to incentivize work and reduce dependency were adopted, including *work activation measures* and a reduction in benefit

⁶ The term legacy benefit refers to welfare systems that existed prior to UC. It still includes Employment and Support Allowance (ESA), Income Support (IS) and Jobseekers Allowance (JSA). Claimants on these benefits will be migrated over to UC by 2024.

levels, well as strong increase of welfare conditionality and sanctions for the UC (*negative activation*).

3.5.2 Political dynamics

The 2010 general elections in the UK brought about a shift from a two-party to a three-party system, as the Liberal Democratic Party entered the coalition government with the Conservative Party. Since then, however, the political landscape in the UK has been dominated by the Conservative Party, despite several political turmoil.

When looking at the political dynamics in the field of MIS, the UK represents as a case of 'continuity' (Verdin et al. 2022). The UC, for instance, was adopted under the Conservative government but its idea arose within the Labour government under the aegis of Lord Freud, and it was eventually supported by both Labour and Conservatives parties. According to Verdin et al. 2022, there was a common vision between the Labour and Conservative parties around the workfare approach behind the UC, while major divisions were only with regard to the design of the scheme (i.e. access requirements, level of the benefits, duration, etc.).

Against this backdrop, minor adjustments on UC have been pushed by other actors. On one hand, there has been a change in public opinion, with around 31% of the population wanted to increase benefit spending in 2009, rising to 37% in 2014 and then to 60% by 2017 (Curtice, 2022). On the other hand, civil society organizations, traditionally very important actors in the provision of welfare since the 19th century (Beveridge, 1942; Townsend, 1957), began to mobilize as they felt constrained by their restricted capacity to influence the policy process (Verdin et al. 2022). In particular, trade unions and civil society organizations were key vocal actors opposing austerity measures in 2008-2010 (Bell, 2019).

More recently, instead, one of the striking developments from the pandemic was the alignment of representative groups of trade unions and business groups in collectively rallying to ask the government to extend social benefits for both insiders and outsiders (Verdin et al. 2022). The presence of a strong socio-political demand heralded a change (albeit temporary) in the political climate under both May (2016-2019) and Johnson's (2019-2022) conservative leadership, leading to an increase in the level of debate concerning UC.

Importantly, however, the political supply has remained largely unaltered. Within the British three-party system, there exists a very broad coalition of opinions within each party, thereby the political supply is largely shaped by movements within parties rather than competition between parties (Verdin et al. 2022). As such, the shift from a two-party to a three-party system in 2010 did not alter the political supply around the UC.

3.6 Spain

3.6.1 Policy development

The absence of a comprehensive national minimum income scheme (MIS) has been considered one of the defining historical features of Southern European welfare states (Ferrera, 1996). Until the late 1980s, protection against unemployment was organized along a 2-tier system including both Unemployment insurance (UI) and Unemployment assistance (UA). In such a context, the income guarantee system – understood as the set of non-contributory benefits that seek to ensure a basic level of economic sufficiency – remained underdeveloped, in contrast to the much more robust contributory schemes. Social assistance continued to rely heavily on informal welfare provision within family and kin networks, at least until the mid-1990s.

However, Spain was the first Southern European country to establish minimum income safety net schemes, although very residual and only at the regional level. Introduced in 1989 in the Basque country, the regional MIS (RMIS) was then extended across other regions: by 1995 each of the 17 Autonomous Communities had its own regional minimum income programme (Soler-Buades et al. 2022). It followed a period of further diffusion in the remaining regions and full *institutionalization* of RMIS (Natili 2019).

This occurred – after the expansionary measures adopted to catch up with European standards in the 1980s – in a context characterized by repeated retrenchment interventions on unemployment benefit schemes and especially UI, that was made less generous in terms of duration (1992) and eligibility conditions were made stricter (1992 and 2020). Retrenchment of UI caused a shift of beneficiaries on the UA scheme.

Due to increased problem pressure during the Great Recession phase (2008-12), RMIS were both reinforced and expanded – although unevenly across *comunidades autonomas*. Some regions reformed MIS in order to make them more inclusive and, importantly, RMIS were all recognized as subjective social rights, mostly conditional on activation programs though (Ibanez et al. 2021). Accordingly, coverage increased from 0.64% (2007) to 1.7% (2017) of total population.

On a similar note, in the post-2008 crisis period, beneficiaries of non-contributory social assistance benefits – such as UA, the agricultural subsidy, regional MIS and active insertion income – peaked at 5 million.

Although remaining residual programs, RMISs in particular became increasingly relevant in the fight against poverty and social exclusion (Aguilar-Hendrickson and Arriba 2020) in an “uncoordinated decentralized model” marked by substantial territorial differences (Natili 2019; Ibanez et al. 2021).

Against such a backdrop, the decision taken by the left-wing Spanish government in May 2020, establishing the first national MIS – *Ingreso Mínimo Vital* – marked a rupture with the previous decentralized model. This novelty was intended to overcome heterogeneity and territorial inequalities in a fully-fledged multilevel governance framework. However, different from RMISs, the IMV is purposely a program oriented towards active labour market and social integration (Soler-Buades et al. 2022) and several implementation coordination issues still need to be addressed (Raitano *et al.*, 2021).

3.6.2 Political dynamics

According to Natili 2019, between 1977 and 2013 Spain was a typical case of moderate pluralism: the level of party fragmentation was among the lowest in Europe and the concentration of votes among the two main parties – the People’s Party (PP) and the Spanish Socialist Workers’ Party (PSOE) – had remained constantly high. More recently however, the Spanish party system has slowly moved towards a fragmented pluralism with more than five relevant parties (PSOE, UP, PP, Vox and regional parties) and multiple cleavages activated in the political arena (left-wing; state-church and territorial) (Soler-Buades et al. 2022).

The political dynamics behind the introduction of the *Ingreso Mínimo Vital* (IMV) is quite complex as several political and social actors mobilize and compete over the issue. Already in 2015, after the Country Specific Recommendation (CSR) to streamline minimum income and family support schemes, several proposals for a national minimum income scheme came from trade unions and left parties PSOE and Podemos. The liberal party Ciudadanos (Cs) also included in their party manifesto a proposal for a new MIS.

In April 2015 the two main Spanish trade unions, CC.OO. and UGT launched the ‘*Prestación de Ingresos Mínimos*’ (Minimum Income Provision - MIP). In May 2016, the unions were able to gather the half a million signatures that were needed to process the MIP as a Legislative Initiative Proposal in Parliament. For workers organizations, record levels of unemployment, poverty and risk of social exclusion signalled failures in the functioning of the labour market and the social protection system. With this initiative, they aimed at a stronger non-contributory and means-tested scheme at national level that would offer a solution to the long-term unemployed lightening the weight on the unemployment subsidy. In other words, unions’ proposals intended to fill the gaps in coverage between unemployment protection and the minimum income programmes at the regional level. The MIP was accepted by Parliament and in February 2017 it became a legislative proposal.

However, strong opposition came from both PP and Cs, arguing for “excessive” public spending. The PP presented an overall amendment which was rejected by the Spanish Congress. After that, in March 2018, the PP government asked for an independent report to the Independent

Fiscal Authority (AIReF) in order to assess the financial feasibility of the proposal. In the view of the trade unions, however, this was a deliberate attempt to decelerate the process (Soler-Buades et al. 2022).

On the socio-political demand side, trade unions have not been 'alone' in pushing for an expansion in the field of minimum income, as other social actors have also played an important role. Anti-poverty (faith-based) organizations, most prominently Cáritas, have been demanding greater coordination among different anti-poverty policies at different levels of government and urged for the creation of a minimum 'national floor' over the last years (Sanzo González 2019).

In June 2018, the conservative government came to an end after a motion of censure presented by the leader of the socialists, Pedro Sánchez. General elections were announced for April 2019. With the existing socio-political demand, the two left parties Unidos Podemos (UP) and PSOE reintroduced more elaborated proposals on MIS in their party manifestos. Podemos moved from the Universal Basic Income of the 2015 elections to a minimum income characterized by low conditionality, generous child benefits and a proposal of 'in-work-benefit'. The PSOE kept a very similar proposal to the one presented in 2015 but narrower in scope compared to Ps. The proposal included a child supplement as a complementary but separated subsidy for households in need, and some work-related conditionality (labour and social insertion programs linked to the benefit). The main target for PSOE was child poverty: "households with children will be given priority, with the aim to mitigate severe poverty" (PSOE, 2019).

The results of the 2019 general elections gave the victory to PSOE but the percentage of votes were insufficient to form a government. After months of negotiations there was no viable majority, and second elections were announced for November 2019. In January 2020, the Parliament approved the first left coalition government in Spanish democracy between PSOE and UP, and with the support of various regional parties. In the Government program ('Acuerdo Progressista' - Progressive Agreement) between PSOE and Ups released on December 30th, the implementation of a national minimum income benefit was exposed as a government pledge in the second section.

Just a few weeks after the formation of the new government the Covid-19 pandemic forced the country into a severe lockdown. The State of Emergency was introduced on March 20, 2020. Together with furlough schemes, the IMV became part of the 'social shield' to cushion the impact of the economic collapse on workers and the most vulnerable citizens. In this light, the new IMV received the support of parties across the wide political spectrum, including regional parties. This political consensus was in line with a large support of the general public.

Despite general consensus, we still find important differences between actors' positions regarding policy design. Although the PSOE and UP had the same view on minimum income as

a redistributive policy and shared the need to reduce the gap between regional minimum income program and unemployment protection, the two parties differed on some issues. While the PSOE claimed for the need to introduce some training and insertion programs (Noguera 2019), UP considered the IMV as a new social right not linked to employment.

On the other side of the political spectrum, the Conservative party (PP) eventually voted in favor of the IMV, although its support was conditional to the adoption of labour market reforms. Instead, the far-right radical party, Vox, abstained from voting. Understanding the abstention of Vox to minimum income programmes is quite intuitive. Radical right positions in this field are often presented as a case of welfare chauvinism: the political view that promotes nativism as the main principle to organize social policy (Mudde 2000). Therefore, radical right parties state that welfare state policies should be directed to the native population, while asylum seekers and undocumented immigrants – groups with no contribution history – should have a very limited access, if any, in particular in the areas of old-age pensions, healthcare and unemployment. The Spanish far-right party Vox complies with this perception, and the party speakers justify their opposition to the new norm precisely on those terms, despite abstaining in the final voting.

3.7 Italy

3.7.1 Policy development

Until the mid-1990s, Italy was one of the European countries where a minimum income scheme was still missing. Despite few attempts of path departure were already made by the centre-left government led by Prodi (1996-1998) (i.e. the Minimum insertion income pilot scheme in 1998), it was only in 2018 that Italy introduced the first MIS, so-called Inclusion Income (REI). Designed as a means-tested monetary benefit conditional upon signing an “individual social contract”, REI aimed at promoting active inclusion through individualized plans and service provision. According to Jessoula et Natili (2020), REI was “the result of a negotiation process between the Gentiloni government (centre-left) and the Alliance Against Poverty – an advocacy coalition of different interest groups – which led to the signature of a joint Memorandum” (Jessoula and Natili, 2020, p. 609).

The full institutionalization of the Italian MIS however took place in April 2019, when the Conte I Government – a coalition government of the 5 Stars Movement (M5S) and the League – introduced the Citizenship Income (RdC). The RdC is a means-tested monetary benefit targeted to poor households conditional on participation in job-searching activities. Compared to REI, RdC is endowed with much more budgetary resources, it is more generous, inclusive, and with less strict duration limits (Jessoula et al. 2019; Jessoula and Natili 2020). Though, it is characterized by stricter conditionality rules for beneficiaries and a quite strong workfare activation profile.

The advent of the pandemic, however, increased the salience of MIS. Eventually, the new coalition government formed by the Democratic Party (PD), M5S and Liberi e Uguali (LeU) decided to introduce a new scheme – the Emergency Income (REM) – with the so-called “Relaunch Decree” – in addition to the RdC. Compared to RdC, REM is less generous in terms of benefit duration (up to 2+2 months) and amount (maximum 780 per month for a single individual) but has less stringent access requirements (no residency requirement) and conditionality measures.

More recently, with the adoption of the 2022 Budget Law by the heterogenous government coalition led by Mario Draghi (2021-2022), there was a shift towards strengthening conditionality mechanisms and sanctions – towards the so-called negative approach to activation. This trend towards *negative activation* has also been pursued by the current right-centre government led by Giorgia Meloni, that in the 2023 Budget Law strengthened even more conditionality mechanisms and sanctions for the beneficiaries, reduced the benefit duration and amount, and declared the “abolishment of the RdC by 2024” ⁷.

3.7.2 Political dynamics

The Italian party system, despite frequent transformations from the First to the Second Republic and the current times, has long been characterized by both multiple cleavages – i.e. traditional left–right, centre-periphery as well as State-Church) and within-poles competition (Ferrera et al., 2012; Picot, 2012). For this reason, Italy is considered to be a typical case of fragmented pluralism (Jessoula and Natili 2020: 602).

Between the mid-1990s and 2013, the socio-political demand for minimum income protection remained quite weak. Social actors, in fact, very timidly supported proposals aiming at strengthening non-contributory benefits. On one hand, religious actors, historically key actors of the decision-making process in the field of social assistance, remained quite unenthusiastic about MIS, while trade unions were reluctant and very much divided on the issue (Jessoula and Natili 2020). In terms of political supply, the Italian political landscape during this period was characterized by a bi-polar party system, where coalition governments of opposite colours took turn, and intra-coalition conflicts coupled with increasing salience of traditionally cleavages – particularly left-right and center-periphery. The interaction between a weak socio-political demand, on one hand, and a fragmented bi-polar party system, eventually resulted in several attempts to path departures – both at the national and at the regional level, always under the centre-left coalitions – followed by policy reversals – under centre-right governments.

⁷ <https://temi.camera.it/leg19/temi/il-reddito-di-cittadinanza.html>

In the aftermath of the Great Recession, a strong socio-political demand emerged, with the formation of a new advocacy coalition of interest groups, the “Alliance Against Poverty” in 2014. In addition to this “new” social actor, social movements began to mobilize supporting a national MIS (e.g. 2013 campaign for a Minimum Guaranteed Income). On the supply side, the 2013 legislative elections brought about the rise of a new populist catch-all party, the 5 Star Movement (M5S), which eventually became the first Italian party in terms of votes.

Against this backdrop, the party system, although still “fragmented pluralist”, shifted from a bipolar to a three-polar system. This shift significantly affected political competition dynamics, and especially the politics of MIS in Italy. The introduction of the Citizenship Income was in fact a M5S’ top priority and actually its battle-horse in their programmatic agenda for the 2018 elections.

In this view, the emergence of a strong-political demand coupled with the shift from a bi-polar to a three polar party system and a weakening of traditional cleavages eventually pushed the Conte I government (2018- 2019), supported by the M5S and the League, to introduce the Citizenship Income (RdC) in 2019.

At the beginning of 2020, the Conte II government, supported by a large centre-left coalition together with the M5S, eventually decided to introduce a new scheme – the Emergency Income (REM). According to Natili et al. (2021), this decision was the result of a series of political exchanges between socio-political actors which has impinged on the political competition and eventually on the government’s decision to introduce a new scheme rather than strengthen the RdC. In particular, with the advent of the pandemic, several proposals were on the table. On one hand, social actors were very much divided on the issue. On the other hand, a strong opposition against the strengthening of the RdC emerged from parties both outside (Lega, Fratelli d’Italia e Forza Italia) and inside of the coalition government (Italia Viva). As a result, the government eventually introduced the REM in order to deal rapidly with the negative consequences of the pandemic.

In February 2021 the government lost its majority in the parliament, and this led Mario Draghi to create a new more heterogenous coalition government with both centre-right and centre-left parties. At the same time, business organizations became more vocal against RdC while trade unions and social actors continued to mobilize to strengthen the latter. On the supply side, however, limited support came from parties within the coalition government – in particular the M5S – while Giorgia Meloni, the leader of the main opposition party Fratelli d’Italia (Fdi) harshly criticized the RdC. Overall, then, pushed by functional pressures and the emergence of an opposing socio-political, the Draghi government eventually adopted the 2022 Budget Law which strengthened conditionality mechanisms and introduced new sanctions with the aim to reduce the ‘disincentives in job searching’.

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