



closing gaps in European social citizenship

Intersectional inequalities and minimum income schemes: Do last resort safety nets help some people more than others?

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- i) to advance the knowledge base that underpins the formulation and implementation of relevant policies in Europe with the aim of exercising the EU social rights as an integral part of EU citizenship and promoting upward convergence, and
- 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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1. The importance of inclusive minimum income schemes

Since the 2008-2012 financial crisis, minimum income schemes (MIS) have received increasing attention as a fundamental tool in the European policy framework to reduce levels of poverty and social exclusion. In 2008, the European Commission issued Recommendation 2008/867/EC on the active inclusion of people who are excluded from the labour market, and since then, protecting an individual's basic right to resources and social assistance has regained visibility in political and academic debates. At the same time, these developments regarding MIS have taken place in a context where the negative effects of the crisis have been combined with an austerity logic in public expenditure. In this regard, several social policy scholars have pointed out that this austerity logic has prevented EU member states further developing active inclusion services (Clegg 2016).

However, the political response to the COVID-19 crisis in 2020 showed a significant change in spending priorities in several countries. In particular, in the field of MIS, some countries have been trying to make advancements: Spain, for instance, developed a national floor - the Minimum Living Income (IMV) - to overcome a regional, fragmented and weak minimum income system. In 2023, the monthly IMV payment was increased to 565 euros, when many regional schemes paid less than 400 euros. In Estonia, positive incentives for work were implemented in 2017 within the Subsistence Benefit, in light of the negative effects that sanctions seemed to have. Another attempt to improve MIS took place in Germany very recently. The new benefit, called Bürgergeld, meant an increase of 53 euros for single beneficiaries and a reduction in sanctions over the first 6 months of receiving the benefit. In addition, more resources were allocated through the Weiterbildung to promote education and training in the long-term, partly leaving behind the "work-first" approach promoted by the Hartz IV reform.

It may be too soon to assess the paradigm change at the European level by examining recent data, barely two years after the COVID-19 crisis first hit in March 2020 and when public budgets are facing unexpected inflationary pressures created by the Ukrainian war. Nevertheless, we can assess whether MIS are inclusive policy tools to reduce risks of poverty and social exclusion, and if so, to what extent. This is a necessary effort that social policy scholars and national and international institutions must make in order to draw new and innovative policy proposals.

Until 2020, the most generous of the EUROSHIP countries (Norway, Germany, and the UK) had been reducing overall spending in income support programmes (from 7% of GDP in 1995 to around 5-6% in 2019) (Coady et al. 2021); and over the 2008-2019 period, MIS may have been the subject of more promises than of substantial political backing across European national governments (Raitano et al. 2021). In addition, austerity agendas concerned with maximizing the impact of spending on poverty conditioned the design and implementation of most means-tested programmes as activation tools. Gábos and Tomka (2022) have indicated that over the last two decades, most EUROSHIP countries have undergone a decline in relative benefit levels. In this context, the fact that poverty and social exclusion have seen significant declines since the 2008 crisis in many European countries was mostly explained by increases in employment rates linked to "work-first" activation strategies. However, this also meant pushing low-skilled workers into low-paid service jobs, which increased income inequality and in-work poverty (IWP) (Jessoula 2021). In all EUROSHIP countries except for Hungary, IWP has increased significantly since 2008, and regarding the Southern European countries (Spain, and Italy), both AROPE and IWP rates increased until 2020, something that has led Jessoula

(2021) to speak of a critical “Southern European syndrome” in the interplay between work and poverty.

These general trends frame recent efforts to strengthen MIS as a central social protection policy, and the main obstacles they face in supporting those that are the most in need. Numerous studies (Raitano et al 2021; Jessoula 2021) have shown that a significant proportion of individuals of working age are ineligible for MIS - even when they fall below a poverty line set at 40 per cent of median income. This evidence has led some scholars to argue that MIS eligibility rules might be limiting coverage by design “either by introducing categorical conditions that exclude potential beneficiaries or by setting the income threshold for entitlement too low” (Figari et al 2012: 10). Against this background, these authors explain that eligibility for MIS recipients is often evaluated in terms of assessing assets and incomes. However, earlier studies do not cover other aspects of eligibility - see Dalli (2019) for an exception -. In this regard, examining who is granted access to social rights -entitlement principle- and when -eligibility criteria- allows us to understand the inclusiveness of social rights and, subsequently, to what degree such rights are granted to everyone (Blum & Dobrotić, 2021; Dobrotić & Blum, 2020).

For this report we use Blum and Dobrotić’s framework (2021) as a starting point, and measure inclusiveness within minimum income schemes (MIS). By inclusiveness we refer to the extent to which MIS are available to all individuals in need, irrespective of their particular personal circumstances. Applying this concept also allows us to tackle the problem of the intersectionality of needs, which is something that is currently not emphasised in the design of the policy, making it insufficiently tailored to intercept the intersections that might magnify a person’s exposure to the risk of poverty. Intersectionality is an analytical framework that allows us to think about different systems of inequalities (e.g. gender, age, migrant background, disability, etc.) as inherently interrelated, and as such, it helps us include the complexity of their intersections when analysing policy needs (Hankivsky et al. 2019). Specific intersections might magnify or reduce the risk of poverty, and then a different grade of exposure to the possible risk could be determined. The inability/ability of policy to adapt to specific needs, and consequently, for an adequate protection for certain profiles to be designed, also affects the way in which MIS is designed across countries. In this report we only look at inclusiveness from the perspective of policy design.

In the following sections (sections 2, 3, and 4) we analyse MIS eligibility rules across the seven EUROSHIP countries - Spain, Italy, Germany, Norway, Hungary, Estonia and the United Kingdom. In so doing we intend to provide further knowledge on the potential limitations posed by policy design for individuals in need. The report focuses on the following requirements to access MIS programmes: age, nationality-residence and unit of assessment (individual, family or household). In these sections, all the information on eligibility criteria and work-related conditionality across European MIS is based on country-expert survey data gathered and shared among all EUROSHIP partners.¹ In section 5, we adopt an intersectional perspective to offer a closer look at how a subset of EUROSHIP interviewees with ethnic minority and migratory backgrounds interact with MIS.

¹ Norway: Rune Halvorsen, Mi Ah Schoyen and Helle Cathrine Hansen; Estonia: Marge Unt and Kersti Kriisk; Hungary: András Gábos and Zsófia Tomka; Germany: Eggers, T.; Grages, C. and Pfau-Effinger, B.; Italy: Angelo Vito Panaro, Viola Shahini and Matteo Jessoula; UK: Rachel Verdin, Ann McDonnell and Jacqueline O’Reilly.

2. How old are you; where are you from? Evaluating age and residence requirements

Age requirements and residence requirements vary significantly across the seven European countries analysed. In some countries, neither nationality nor long-term residency requirements are in place. In others, migrants need to wait many years to become eligible, such as in Italy where 10 years of legal residence are required, or the UK where migrants cannot claim benefits until they have ‘indefinite leave to remain’ status which normally takes five to ten years and can be dependent on their financial situation.

In **Italy**, since the introduction of the Reddito di Cittadinanza (RdC) in 2019, individuals over the age of 18 - with no upper age limit - are eligible. The benefit is granted to Italian and EU citizens, non-EU citizens with a permanent residence permit, refugees, asylum seekers and persons who are entitled to subsidiary and/or international protection, as well as family members of Italian or EU citizens and stateless persons. However, as said, the residence requirement is very strict, imposing 10 years of legal residence in the country – and with the last two years being continuous.

In the **United Kingdom** (UK), the minimum age to access the Universal Credit (UC) is 18 and the maximum age is that of the state pension age. As per the Pensions Acts of 1995, 2011 and 2016, this age is gradually rising, and is expected to be 67 by 2028. With regards to nationality-residence, individuals falling within the following status can apply: (i) British or Irish citizens, those with (ii) indefinite leave to remain (ILR), (iii) refugee status or humanitarian protection, (iv) settled status under the EU settlement scheme, (v) pre-settled status under the EU settlement scheme and who meet extra conditions. In addition, it now covers those who hold (vi) a visa under the Ukraine family scheme or the Homes for Ukraine scheme. Exceptions are also made for homeless people - they can get benefits if they can prove their identities, although these do not include housing benefits - and asylum seekers of any age, who receive £40.85 per person per week and some form of housing, although as well as being a hostel, this could also be a detention centre. An asylum seeker is not able to work or claim any benefits until their refugee status is determined. As said above, in the UK, migrants can only claim benefits when they have ‘indefinite leave to remain’ status which normally takes five to ten years. In addition, migrants pay a national insurance levy which is approximately £500 a year. They have no access to public funds; however they can work and when doing so are subject to taxation and national insurance contributions.

In **Germany**, all legal residents of working age (18-64) who are in need of support are eligible for the MIS, but they must be available to work at least 3 hours per day and have their habitual residence in Germany. This includes people living with the claimant in a joint household (“Bedarfsgemeinschaft”), such as children younger than 25 years of age and spouses/partners. Some non-national groups are not eligible, in particular asylum seekers without permanent residence permits, who receive an asylum benefit instead.

In **Norway**, there is officially no age requirement, although in practice the allowance is seldom granted to children under 18 years of age, due to the Children’s Act recognising parental responsibility for providing for their children under 18. As for residence-nationality requirements, foreign citizens must have legal and permanent residence in Norway. If they do not have this, they are still entitled to financial assistance in emergency situations. For example, citizens of the EEA are permitted to stay in Norway for up to three months, or six months if actively seeking employment. During this period, the individual is expected to provide for

themselves, and does not have the right to social assistance beyond emergency help in acute situations. Along these lines, a European Court of Justice sentence determined that an EEA migrant cannot expect access to national benefit schemes, including the minimum income, unless they have earned access to it through working in the receiving country (Hatland 2015). There are some special regulations for refugees when they move to another municipality during the first five years of settling into a first municipality. Furthermore, neither asylum seekers housed in asylum reception centres nor persons who reside illegally in Norway have the right to social assistance, although they can be entitled to emergency financial aid and emergency shelter. This can only be granted until the claimant is able to leave the country.

In **Hungary**, the age requirement in place to receive support for health-related impairments, for taking care of children and to receive the employment replacement subsidy is that the recipient must be at least 18 years of age and must not yet have reached retirement age, with no exceptions to this for any specific vulnerable groups. These benefits can be provided to long-term residents and persons with the right of free movement (EEA nationals, family members of EEA nationals, and family members of Hungarian nationals), who have been resident in Hungary for more than 3 months (Albert 2015: 8).

In **Estonia**, there are no age requirements. Retired people who fall below the minimum subsistence threshold can also apply. Young people under the age of 24 who live independently can apply although being granted the benefit this is subject to strict residential conditions. In terms of residence, all legal residents have access, and also the beneficiaries of international protection (refugees). However, asylum seekers are not entitled to the aforementioned benefits, but they receive the same amount of monetary help from their accommodation centre.

Lastly, **Spain** has stricter age requirements than the rest: 23 years old, or 18 if the claimant has a dependent child. However, those between the ages of 23 and 30 have to prove that they have lived independently (outside their parents' home) for the two years prior to requesting the aid and that they have contributed to Social Security for at least 12 months within that same period. These requirements are not applied to those above 30. The Spanish minimum income includes important exceptions to the requirements: women who are victims of gender-based violence, victims of human trafficking and sexual exploitation, children who have been under state guardianship in the three years prior to their 18th birthday. The residence requirement is one year, with the same exceptions. Table 1 summarizes the age and residence eligibility requirements, and whether legal exceptions are made for vulnerable groups.

Table 1. Eligibility requirements

	Age category	Residence (years)	Exceptions*
ITA	18	10	Yes
U.K	18-67*	5-10 years	Yes*
NO	18	Pre-condition	Yes
GE	18-64	Pre-condition	No*
HU	18-65	3 months*	No*
EST	No	Pre-condition	Yes*
ES	23 (30)	1	Yes

Source: *Own elaboration.*

* *ITA: Exceptions for vulnerable groups.*

* *UK: The pension age in 2018 will be 67. Currently (2023) it is lower.*

* *UK: However, asylum seekers are not able to work or claim any benefits until their refugee status is determined. In addition, migrants pay a national insurance levy which is approximately £500 a year. Migrants have no access to public funds; however they can work and when doing so, pay taxes and national insurance contributions.*

* *GE: Some groups of foreigners are not eligible, in particular asylum seekers without permanent residence permits.*

* *NO: financial assistance in emergency situations.*

* *HU: Only for long-term residents and persons with the right of free movement (EEA nationals, family members of EEA nationals, family members of Hungarian nationals).*

* *EST: The beneficiaries of international protection (refugees) have access to the SB. However, asylum seekers are not entitled to the aforementioned benefits, but they receive same amount of monetary help from their accommodation centre.*

3. Who do you live with? Evaluating the unit of assessment in MIS

The unit of assessment (UA) might trigger different modes of social exclusion. For example, when national governments consider a family as a UA, they underestimate the potential economic dependency of women (and dependent members such as non-emancipated young people) on their families. In addition, people who are not related but live together and suffer economic constraints might be excluded from the benefit. Claimants often need to be legally constituted as a household in order to enter the system, and this frequently leads to the exclusions of vulnerable individuals with migrant backgrounds that live together for economic reasons.

In **Italy**, for example, the family unit is the UA. The period of time for the assessment is one year, and there are no exceptions for groups in vulnerable positions. Moreover, if there is a change in the family unit (e.g. a death or a birth), the beneficiaries must submit a new claim for the RdC/PdC within 2 months of this change. If they do not do so, the benefit is withdrawn. This might be too coercive for individuals in vulnerable positions since they often face administrative burdens throughout these processes. In the UA, individuals under 26 years old might be considered as independent from the family unit and therefore be able to claim the RdC autonomously when: i. they have a minimum income of 4,000 euros per year; ii. are married; iii. have children. If the claimants do not fulfil any of those requirements, if they are under 26 years of age, they are considered part of the same family unit.

In the **UK**, in Norway and in Hungary the UA is at the individual level. The Job Seekers Allowance in the UK can be claimed individually by anyone over the age of 18. However, for

additional help with housing costs the UA is the household income. This generally refers to the combined gross income of all members of a household above a specified age. Social assistance in **Norway** is also provided to individuals, although married people and dependent children are considered as one economic unit, as they are legally obliged to provide for one another. Moreover, any alternative income that members of the household might receive are to be deducted from the amount of social assistance payable. However, municipalities/caseworkers are known to follow different practices concerning the deduction of earnings brought home by teenage children. In this sense, recent national guidelines now recommend that such additional earnings should no longer be deducted.

In **Hungary**, the UA is primarily the individual. Nevertheless, there is a maximum two-individual eligibility condition which states that there can only be two beneficiaries in one household if one person is receiving the employment replacement subsidy and the other is receiving support for a health-related impairment and childcare role (Gábos and Tomka 2022). Also, the applicant is entitled to the benefit if the per-consumption-unit net family income does not exceed 90% of the statutory minimum pension (HUF 25,650/EUR 83) (Albert 2015: 9). There are no exceptions to these conditions for groups in vulnerable positions.

Estonia, Germany and Spain all take the household as the UA. The SB in Estonia states that the UA is a household that lives and functions together usually at the same location (address) based on the census, but no exceptions are taken into account for vulnerable in vulnerable positions.. **In Germany**, the SGB-II is means-tested on a household basis, including cohabiting with people of a different sex. **In Spain**, the IMV provides sufficient guarantees for special situations that do not meet the conditions established to form a household. The law understands a household as a unit formed by two or more people residing in the same home and who are related to each other by blood or by affinity up to the second degree. Nevertheless, when people do not have the expected family ties but live at the same address, they might demonstrate through a certificate issued by the competent social services that they are indeed at risk of social exclusion. In addition, in Spain several special situations are contemplated for certain people (for example, for women who are victims of gender-based violence, among others), and also for certain special residential situations (when a person lives in a hostel, or is subletting a room, for example). However, although these provisions seem to increase the inclusiveness of MIS, they often imply complex and tricky bureaucratic procedures that do not facilitate access to potential recipients.

4. Work-related conditionality for groups in vulnerable positions

Looking at how work-related conditionality within MIS applies to groups in the most vulnerable positions, with serious employability gaps is crucial, since many studies show that a strong conditionality in this regard can generate unfavourable long-term outcomes with regards to earnings, job quality and employment retention for these groups (Watts et al. 2014). Along these lines, young people, homeless people, ethnic minority communities, people with mental health problems, disabled people and individuals with low levels of qualifications and work experience have been identified by this literature as the most affected (Watts and Fitzpatrick, 2018; Patrick, 2011). Tight conditionality can therefore be ineffective in promoting paid employment for certain people, ultimately leading to further inequalities among disadvantaged individuals (Dwyer and Wright 2014). Table 2 highlights the extent to which such groups are taken into consideration when introducing exceptions to work-related conditionality within MIS.

Table 2. Work-related conditionality in EUROSHIP countries

<i>Country</i>	<i>Work-related conditionality & exceptions</i>
ITA	<p>Strong work-related conditionality.</p> <p>The sanctions introduced with the Budget Law 2022 – e.g. 5-euro reduction after a first job-offer rejection and the withdrawal of the benefit after a second job-offer rejection – do not apply to i. a family unit that has a disabled or non-self-sufficient person; ii. a family unit where at least a member is below 3 years of age or iii. all the cases where beneficiaries are excluded from signing the Pact for Work and Pact for Social Inclusion.</p>
UK	<p>Strong work-related conditionality</p> <p>Claimants are expected to sign a contract (claimant commitment) which clearly states their obligations with regard to finding work or finding better paid work. These contracts differ according to individual circumstances. For example: someone who is carer for a child, as the child gets older, has the obligation to find work increases; if the claimant cares for a child under 1 they would not be asked to work in return for their Universal Credit, whereas by the time a child is aged 13, they would be expected to work full time (35-hour week or spend 35 hours looking for work). If the claimant is aged 18 to 21, they are required to take part in Youth Obligation for six months in return for the benefit.</p> <ul style="list-style-type: none"> ○ Other points to note; an estimated 15 billion pounds of benefits per year are not claimed (UK) ○ Proving a disability affects people’s lives and ability to work and the process is onerous and intrusive. ○ The benefit cap is applicable to claimants that are unemployed. The effect is to cut the level of benefits received below an amount that is considered enough to live on.
DE	<p>Strong work-related conditionality, but softened since the 2005 reform, and activated with an enabling character.</p> <p>In order to receive UB II, claimants have to be constantly “available” for integration into the labour market in terms of time and place, and have to actively look for work and accept any suitable employment offer, training programme or work programme. All jobs are defined as suitable as long as the person is physically and mentally able to carry out the work and the work does not conflict with the provision of care for a child younger than 3 years or another family member. A sufficient reason not to accept a work offer is not that it requires different or lower qualifications than the person holds, if the working conditions and wage are worse than in their previous job or if the working place is further away than that of the previous job, while a daily commuting time of 2.5 hours is regarded acceptable. If claimants do not comply with the principles of availability and suitability, they can be sanctioned and their benefits can be reduced by 30% of the standard amount for three months. Sanctions apply to all benefit recipients, as long as people are classified as “employable”.</p>

NO	<p>Low work-related conditionality but strengthened in recent years.</p> <p>Since 2017 municipalities are required by law to set an activation condition for recipients of financial assistance who are under 30 years of age after an individual assessment of the recipient's capabilities (Social Service Act, §20). In 2021, a change was made to the Social Service Act (§20a), stating a duty for the municipality to have a condition that young adults under 30 learn Norwegian for those who were not able to support themselves due to lack of Norwegian language skills (Government proposal to the Parliament, Prp. 24, (2020-2021)). The level of assistance and follow-up is grouped into categories to which the service user may be assigned depending on the service user's needs and distance to the labour market. An ordinary job seeker will be assigned to 1) standard effort, meaning that they will not receive any particular follow-up. If they are defined as being further from the labour market, they will be assigned to 2) a situationally-adapted service, meaning that they will receive follow up and employment-oriented measures. However, if they are classified as having reduced work capacity they will be assigned to category 3) specially adapted service, meaning that they are entitled to comprehensive follow-up and individually-tailored measures. Finally, those for whom ordinary employment is out of reach will be assigned to the category of being in 4) permanent need for assistance (Nossen & Gjerde, 2022).</p>
HU	<p>Strong work-related conditionality for those receiving the <i>employment replacement subsidy</i>: these have to accept any employment opportunity offered. If they refuse, their entitlement to the provision will be terminated – also in the case that the recipient does not apply to register as unemployed within the given timeframe when granted benefit for persons of working age, or cannot fulfil his/her duty of at least 30 days of employment at the yearly revision of the benefit, among others. However, those receiving <i>support for health impairment and for taking care of children</i> have no obligation to do this: they are exempt from the conditionality attached to the employment replacement subsidy.</p>
EST	<p>Strong/medium work-related conditionality. However, in practice, for local governments, sanctioning is very rare. For people with full disability/ no work ability, activation is not mandatory.</p>
ES	<p>Low social inclusion conditionality is attached to the IMV in terms of design, but, however, no specific social inclusion activities nor sanctions have been implemented yet. Beneficiaries must register as job seekers in the first six months after being granted the IMV.</p>

Source: Own elaboration based on EUROSHIP country reports, and Raitano et al (2021).

5. MIS and ethnic minorities with a migrant background,² an intersectional perspective

Ideally, MIS policies should help persons in difficult socioeconomic situations participate in society in more satisfactory and meaningful ways than their recurrent daily struggles to survive with no hopes or aspirations for the future. These policies are often evaluated along their three main institutional dimensions: access to MIS benefits, their adequacy (income level in relation to poverty thresholds), and how enabling these benefits are (Raitano et al. 2021, Jessuola 2021, Natili 2019). Given the mix of variables behind inequality and vulnerability, exploring these three dimensions with an intersectional perspective helps to understand the links between the design of MIS and implementation issues, on the one hand, and, on the other hand, their outcomes. In other words, when MIS benefits and services are just tools to put beneficiaries back to work as soon as possible regardless of working conditions or the personal preferences, or to what extent these income programmes facilitate active inclusion practices across different social groups.

We have no detailed quantitative data about how people in vulnerable positions and who have a migrant background in the seven EUROSHIP countries have access to MIS depending on their income and poverty levels. However, in the EUROSHIP life-course interviews we have collected considerable qualitative evidence about how interviewees experience their access or lack of access to MIS benefits, to what extent the income levels received attenuate their hardships, and in which ways this improves their participation in the labour market and/or society.

We found numerous concerns regarding access, adequacy and enabling issues. In the seven European countries we studied, numerous ethnic minority migrant interviewees reported that they had suffered language obstacles and bureaucratic difficulties to obtain information and to tackle the administrative procedures to make their requests. Many said that they would have appreciated interpreters, easier application forms, and more transparent information. For example, Ira (DE-3-1-Ira), a Polish-German woman in her thirties, raised the issue of how public sector professionals should provide more information about the help offered by NGOs when relevant, since it had actually proved crucial in supporting several interviewees in processing their applications for MIS. Among those whose applications were rejected, many thought they had made mistakes in the application process, while others did not understand the reasons why their applications had been denied. A few interviewees said that given the excessive bureaucratic hurdles, the unclear prospects of obtaining the benefit, and in some countries, the low levels of benefits granted, they had decided not to request MIS benefits.

Before even considering eligibility issues among ethnic minority migrant interviewees, we discovered that many were reluctant to ask for means-tested support unless they were enduring very difficult situations. This raises the issue of differences in feelings of entitlement between social groups, fears of stigmatization, and feeling discouraged by complicated procedures. Several of the interviewees felt that some staff from the administration treated migrants with mistrust, as if they were asking for help that they did not really need. However, others

² We stress our attention on ethnic minority migrants rather than migrants in general because many of them talk about how intersectionality matters. In their life stories, ethnic minority disadvantages (language barriers, religious, cultural and value differences) interplay with migratory situation obstacles (residence permits, accreditation of qualifications, weaker family and networks' supports). These difficulties often overlap, and sometimes it is not so easy to differentiate what is behind what, but they refer to different social realities.

appreciated the support and tailored individual help provided by their case workers and coaches (UK-2-1-Anissa), or how supportive it is to meet a personal adviser that belongs to one's own ethnic-minority group (EE-3-1-Maria).

Eligibility

As we saw in section 2, in most European countries, the residence requirements (see table 1) to access MIS increase the risks of excluding population groups in extremely exposed conditions: homeless people, Roma living in settlements, and migrants who are not legal residents. Getting resident permits may be difficult, and it may require customized help by NGOs or public sector personnel. Many interviewees obtained this support from NGOs and/or public sector social services, with numerous cases in which NGOs and public sector worked together, combining formal and informal procedures of multi-agency collaboration. Other migrants lacked this support.

Several ethnic minority migrant interviewees struggled to obtain residence permits. Besides, since obtaining a residence permit is a crucial step for many subsequent applications, they are particularly vulnerable when the procedure for obtaining residence permits is designed in ways that their lack of information can be abused by some of the actors involved. Serge (NO-2-2-Serge), a 41-year-old Balkan migrant living in Norway, remembers his vulnerability during his first years in Norway when his first employer told him "I own you", referring to the fact that Serge's Norwegian residence permit was dependent upon him having a work contract. He struggled to get the right information.

For several groups such as homeless people, undocumented migrants, and regularized migrants without a fixed residential address, it is often difficult to meet the formal residential requirements to access benefits or to provide the detailed documentation to prove them. For example, in Spain, one's domicile is accredited by means of a city registration certificate, and this has been a main obstacle for several of the interviewees that had insecure accommodation arrangements.

Among them: ES-3-1-Ana, a young woman in her thirties from El Salvador who had been living in Spain since 2018; and ES-3-2-Nabil, a 33-year-old Moroccan who had been living in Spain since 2017:

"We spent some time (years) without being registered, and for any help, they ask you for a year or a year and a half of being in Barcelona (or in the country). Since we arrived, we have "lost" that time and therefore our access. They didn't explain that to me, since you arrive you have to go, and I didn't know that you could register without a fixed address. So, of course, we went to the place, we asked if they could register us and they told us that they couldn't, and nothing happened... from now on more doors will open, but we have lost time there that we have to recover" (ES-3-1-Ana)

"Not having a city registration has meant plenty of difficulties in finding jobs... I had to do shit jobs in bars and shops... And during the COVID I did not get the minimum income because of that". (ES-3-2-Nabil)

Moreover, residence criteria still carry inbuilt assumptions that favour native long-term settled life courses, that prejudices the more itinerant lifestyles of migrants who are looking for jobs across several European countries. Jonathan (IT-2-2-Jonathan) a 37-year-old Chadian, was 21 when he left Chad. He spent 5 years in Libya working in cleaning and delivery jobs before arriving in Italy in 2011, where he lived in Florence for a couple of years. He then looked for

jobs in France and Germany. When his ID card expired, he had to go back to Italy, and in 2016 with the support of an NGO he began to apply for citizenship. By 2022 he was expecting to get his citizenship. In the case of Italy, the strict 10-year residence requirement is behind the fact that out of 13 migrant interviewees who have experienced several years of hardship in Italy, none of them received MIS support, even if several benefited from significant support from NGOs (free/cheap accommodation in community housing, shelters, access to social services, food, clothes, mental support) and other public sector benefits. The way the 10-year residence requirement is designed and managed means that ethnic minority migrant interviewees such as IT-2-1-Alma, IT-2-1-Ida and IT-2-1-Loretta, who have been living in Italy for over 10 years, but not continuously and without the necessary documentation to prove it, have no access to the Reddito di Cittadinanza (Italian minimum income), despite having suffered and still suffering intersectional and heavily cumulative disadvantaged situations (the three of them, after years of hardships, recently entered shelter homes). Their life trajectories in Italy include long undocumented periods, numerous residential changes and years of homelessness, that block their access to the Reddito di Cittadinanza. In addition, IT-2-1-Lina, a 42-year-old Romanian woman who grew up as an orphan in Romania and arrived in Italy in 2016 in search of her sister, is one of the interviewees who have been through many long-term difficulties in their lives. She has received support from NGOs and in 2021 entered an NGO shelter home, but she has no access to Reddito di Cittadinanza or other enabling benefits. Lina said:

“You know, to get this and there are always requirements, and there is always some kind of requirement that I don’t have. I feel abandoned, as if I never had what it’s needed to have a chance to improve the situation.” (IT-2-1-Lina)

As for income eligibility, we found several cases of ethnic minority migrants who had been unsuccessful with their MIS applications despite experiencing economic hardship. Several of them were excluded because of the income threshold eligibility criteria. In this sense, it is worth stressing that among our larger group of 210 interviewees we met people who as a result of their paid employment were above the income eligibility threshold to get any MIS; but these people, after paying high rents -specially in big cities, ended up with less disposable income than persons receiving MIS and who did not pay for accommodation. Among the former group, we found both natives and migrants, but migrants may be overrepresented since most of them are not homeowners, are forced into more frequent residential mobility, and have limited access to social housing (we have no more extensive quantitative evidence of this). The ethnic minority migrants we interviewed who were in this situation had irregular employment trajectories made up of mixed spells of unemployment, involuntary part-time work, and low-paid full-time positions in caring and cleaning jobs. In the case of IT-2-1-Dina, a Nigerian 42-year-old woman, despite having worked almost every year since she arrived in Italy 20 years ago, a housing debt and the subsequent eviction procedure put her in a critical situation that made her consider suicide. For these migrants in low-paid jobs who rent accommodation, primary residence not being computed in the income threshold eligibility, or the way it counts very low when it does, may limit their chances of obtaining MIS. Therefore, they benefit more from pre-distributive measures such as a higher minimum wage, housing policies, and MIS compatibility with paid employment. As IT-2-1-Meri, a 56 Honduran woman working in Italy as a full-time “badante” (elderly care worker), puts it:

“If I looked at a studio apartment of 600 euros plus expenses, I’d just work to pay the rent with nothing left.” (IT-2-1-Meri)

In this way, Meri has to rent a room for her and her daughter in a shared flat with other people, something she dislikes doing, as she misses having her own space without having to constantly

compromise with other people's habits. She is in a similar situation to ES-2-1-Marta, a 48-year-old Equatorian mother of four who has been living in Barcelona since 2005 and earns around 800€ per month caring for old people but spends 600€ renting two rooms in a shared flat for her and her three younger children.

Adequacy

In terms of adequacy, there are vast differences across the EUROSHIP countries in levels of minimum income benefits (from less than 15% of median disposable income in Hungary, to over 50% in Germany for a couple and 2 children, Jessoula 2021). Still, even in the more generous contexts, MIS have a limited impact in reversing poverty. At most, when combined with other support (childcare and housing benefits, NGOs, and family), MIS offer a vital lifeline against severe poverty. A main difference between ethnic minority migrant interviewees who receive MIS and natives with native backgrounds receiving them is that the latter are much more likely to combine MIS programs with other public (childcare, training) and non-public support (especially support from their families with childcare and access to housing), which not only affects their final standard of living, but above all affects the radically different enabling potential of the same level of benefit. A very small number of interviewees, thanks to receiving MIS benefits, had some room of manoeuvre to improve their participation in paid employment, including the possibility of substituting low-paid low-skilled waged work with voluntary, training, and other activities for significant periods of time (> 1 year). But the large majority of them were natives. In a very small number of cases, ethnic minority/ migrant interviewees benefiting from MIS were in paths that led towards possibly decent jobs, but we met no one who could speak of a transition that had been achieved from poverty to average-paid employment. However, this may be less related to the design and implementation of MIS programs than with the macro-structural trends in the labour market that overshadow the potential of social protection policies. As we said in Ibanez et al. (2023), the kinds of jobs that can help people out of poverty and offer them a foreseeable horizon of improved working conditions to better fulfil their long-term life plans may be in decline in most European countries. A particular view on the interplay between MIS and in-work-poverty was offered by NO-2-1-Stanislav,

“The system needs people like me, as a driver of a garbage truck. If people become better with money, then we would not have people who would clean floors and such. Those who clean can't get better salaries and jobs because they don't have the education... If they become wiser and others become wiser, then in the end we would not have anyone to wash floors anymore.” (NO-2-1-Stanislav)

For all ethnic minority migrant interviewees who received MIS benefits, these payments were often crucial in mitigating their material scarcity, but most of them remained trapped in situations where they were “getting by”. This was the case of UK-3-1-Rebecca, a 32-year-old separated Bangladeshi-British mother of four young children, who left education at 14, and currently combines low-paid part-time jobs with universal credit support (including childcare costs). Caring for her children and working part-time in a job that in her own words “has no career prospects” leaves her no time to do anything else, as compared to her sister who managed to get into university as an adult and will get her law degree soon, thanks to her husband and family support. The British universal credit system is insufficient for Rebecca,

“... I have borrowed off my sister, ... I've borrowed off my next-door neighbour. She's dead nice to me anyway and my Universal Credit came through today which I need to pay her back with today. It's just so complicated, I get so frustrated. I did actually get so low and I told them right I'm going to have to leave my job..., you're not paying

me full and you're not helping, so I'd rather just sit on my backside and do nothing or what people say people do when they claim benefits that's what I'm gonna do now.”
(UK-3-1-Rebecca)

The enabling role of minimum income benefits

Among the 210 EUROSHIP interviewees, we came across a handful of cases where minimum income benefits played a clear enabling role. Most of them were in Norway and Germany, and the interviewees reported how receiving minimum income benefits and the predictability of receiving it long term was a key factor in allowing them both a standard of living that was austere but far from severe deprivation as well as considerable autonomy to participate in society. For example, Mahsa (De-2-1-Mahsa), an Iranian refugee woman in her forties living in Germany said her asylum benefit offered her and her son a very simple but secure livelihood, including housing. The money she receives is not sufficient, and she needs to complement it with NGO supports (subsidized food, clothes, furniture, tec), but she has time to take German courses and training to become a supply teacher. However, even in Germany, the European country where MIS are more developed in terms of coverage (7.38% of the population) (Jessoula 2021), Ute (DE-1-1-Ute), a Czech-German woman in her seventies, speaks of her rather difficult life. She worked from her early youth until her fifties as a chambermaid and waitress in different hotels and guesthouses, and her financial situation was never ideal, but it became problematic in her early fifties, when she could no longer find work. She received a minimum income, and even though she was not put under much pressure to find paid work by the employment office, she found the income too low, and she regularly needed and continues to need support from NGOs for food or clothes, and also for “an open ear” that she particularly appreciates.

Most of the interviewees who live on benefits feel they are in the midst of a struggle it is very hard to escape from, and which considerably constrains their social activities, even basic socialising. This was stressed by Anisa (UK-1-2-Anisa), an Algerian woman in her forties who has lived in the UK for 14 years and has spent the last two years living through a very difficult situation despite receiving income support. In 2022, when the interview took place, she was receiving a job-seeker allowance of £133 a fortnight. She spoke of her last two years:

“Basically, I can't (manage) I live on tea and biscuits when I can afford it until the one meal I have in the evening. I didn't put heating on at home for the last two years. I put on layers upon layers upon layers: to keep warm.”

“People need to understand what's going on. I don't go anywhere. I don't see anybody because I can't pay for my coffee. So, I don't have anything. I can't even be honest with my family about what I'm going through. I keep myself to myself. The birds in the garden are my only companions. There is no fun to be had, what would you need to tell people, how miserable you are, how miserable your life is. I don't want to go through this with anybody else. It's not fair on people, they've got their own problems.”

In relation to social participation and the enabling role of MIS, a key area of interest is the wellbeing of children of MIS beneficiaries and the social activities accessible to them. This is an issue raised by several migrant interviewees. Anna (NO-3-1-Anna), a young single mother living in Norway who is a migrant from a South-eastern European country, explained how despite receiving a combination of different benefits and doing part-time jobs, she felt her son was not participating in activities that were important for his development because of her lack

of resources, and she stressed the importance of supporting meaningful activities and social networks for low income families, parents and children.

MIS policies rarely provide an escape from relative poverty, but they may offer a basic income that gives beneficiaries a sense of security to consider different options. In the case of EE-3-1-Maria, a 25-year-old Russian young woman living in Estonia, this security is given by a disability benefit:

“Disability benefit is the best thing I have, I always know that now I can feed myself with something, pay with something, that this [benefit] will always come, no matter what happens to me, what time it is, there [will be] work, there will not [be] work, I know that this amount will always be there. Well, it calms me down very much, that I don’t worry that I’ll be completely at zero for a month, without some kind of money coming in, that this is a benefit, it saves me a lot of... right, well, I can’t put into words how much it saves me.”

6. Conclusions

Across Europe, means tested minimum income programs (MIS) can help to reduce inequalities, but their main reason of being still is their original goal: supporting people in severe deprivation, and this is embedded in their design. With the increasing presence of activation logics in social protection policies since the 1990s, MIS also become part of the policy repertoire that could help people into employment participation. After the Great Recession and more recently the Covid-19 crisis, at the same time as employment and in-work-poverty rates kept rising to record levels, several European governments re-oriented MIS to better help persons left in vulnerable situations and with significant employability gaps, for whom paid employment was not always a feasible part of the solution, at least in the short and medium term. Therefore, MIS are gaining terrain as tools to support social inclusion via both employment-oriented activities (training, public-sector and NGOs workfare activities), and non-employment-oriented activities (volunteering, lifelong learning, culture, and leisure). For some persons, MIS may actually be more supportive in enabling social inclusion when favoring non-employment-oriented purposes and activities, than when promoting employment-oriented ones.

The different welfare and economic dynamics in the seven EUROSHIP countries we have studied, shape a diversity of MIS realities. MIS are more consolidated in Germany, but countries such as Norway or the UK have favored other social protection systems (unemployment and disability insurance and/or assistance). In the other EUROSHIP countries, MIS are less developed, as they have trusted in employment participation as the main and almost unique form of poverty reduction policy. To some extent, and for some groups, this has worked in Hungary and Estonia. By contrast, Italy and Spain have expanded MIS as an anti-poverty almost social emergency tool in response to growing in-work, relative and total poverty since the 2008 crisis. Still, by early 2023, in the seven countries, it is too soon to assess radical changes in terms of the social relevance of MIS and in the public expenditure allocated to it. There is no clear structural departure from the constraining logics that have framed welfare public policies across Europe since well before 2008, and this looks even more difficult in the present context of inflationary pressures fueled by the war in Ukraine.

With the idea of looking at MIS policies from one of several possible intersectional angles, in section 5 we present a preliminary discussion of how 30 ethnic minority migrants we have interviewed in EUROSHIP interact with MIS programs. In line with a qualitative perspective, a close attention to personal cases, to their ambiguities, contradictions, and singularities, reveal that the differences between interviewees within the same intersectional categories, in both the degree of cumulative disadvantages and in how these disadvantages are coped with, are much more striking than the differences between different ethnic minority migrant groups or between different intersectional categories. However, ethnic minority migrants do share some common. We have stressed three of them. First, in all countries they have a more limited access to MIS than natives, either because of residential eligibility criteria, irregular situations, itinerant lives, or language and information barriers. Besides, as many migrants feel urged to accept any paid employment regardless of the working conditions, they end up following employment trajectories that make them ineligible to MIS because of income thresholds, even if these trajectories are precarious and trap them into in-work-poverty in the long term. Finally, among those ethnic minority migrants who benefit from MIS, many have little or no possibilities to combine the meagre MIS benefits with additional forms of support (e.g.: access to housing or post-compulsory education). This certainly limits the enabling potential they may get from MIS. For them, MIS is often vital to make ends meet, but is far from enough to succeed in a meaningful participation in the labour market or society more broadly.

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