



Ministero degli Affari Esteri
e della Cooperazione Internazionale

Comments to the Memorandum of the Commissioner for Human Rights, Michael O’Flaherty, on child poverty in Italy

July 2026

The Italian Government would like to express gratitude to the Commissioner for Human Rights for the Memorandum on child poverty in Italy and for the constructive dialogue held with representatives of various Ministries during his visit from 12–16 January 2026, and reaffirms its full commitment to the goals of the European Child Guarantee and of the Council of Europe Strategy for the Rights of the Child 2022–2027.

The Italian Government is pleased to submit the following Comments to the Memorandum.

1. Factual remarks

- Paragraphs 21 and 39

“The Commissioner appreciates that child poverty is recognised as a serious issue by the Italian authorities and that considerable efforts have been made over the years to address it. He also welcomes that all interlocutors are aware of the need to redouble their efforts in this field.

The Commissioner welcomes reassurances from the authorities that several actions have been implemented in recent years to tackle these challenges. In particular, the Italian government has launched several initiatives focusing on infrastructure, digitalisation, and the reduction of regional disparities, leveraging resources from the EU-funded National Recovery and Resilience Plan (NRRP) and other EU funds, 42 linked to the European Child Guarantee. These resources primarily target nursery expansion – linked to new LEPs set in 2021, guaranteeing access to nursery for at least 33% of children – 43 the construction of school canteens, and the establishment of orientation services to prevent school dropouts. Authorities also pointed to the introduction of criminal sanctions against parents of children not attending school, through the so-called “Caivano decree”.”

According to data published by Eurostat for 2025, the Early Leavers from Education and Training (ELET) rate in Italy stands at 8.2%, below the EU average of 9.1% and better than the rates recorded in several other member states, such as Germany (13.1%) and Finland (9.9%). The trend is steadily positive: 10.5% in 2023, 9.8% in 2024, 8.2% in 2025. The European target of 9% by 2030 has thus been achieved five years ahead of schedule, and the National Plan for Recovery and Resilience (therein after NRRP) target of 10.2% has been exceeded. The Memorandum acknowledges the improvement of explicit dropout rates only in footnote 48, immediately qualifying it with unsourced considerations on data reliability: a result of this magnitude, achieved in the very policy area identified by the Memorandum as an entry point to breaking intergenerational poverty cycles, deserves adequate reflection in the main text.

The Memorandum does not refer to *Agenda Sud* and *Agenda Nord*, the largest national programmes specifically designed to tackle early school leaving and learning gaps in the most disadvantaged schools, starting from primary education, in Southern regions and in the peripheries of large urban centres, respectively. These programmes, supported by NRRP investments and by the National Programme “School and Skills 2021–2027”, deploy targeted actions including mentoring and orientation (as of 2025, 820,000 students have been mentored and individually accompanied), extended learning time, strengthened basic skills and enhanced

school–community cooperation. Sustainability of guidance measures is further ensured by the “*Orientamento*” initiative under the National Programme 2021–2027, with a total allocation of EUR 136,147,500 for the 2024–2026 period, providing guidance pathways in lower secondary schools.

Participation of children under the age of three in formal childcare is growing steadily: according to the Education and Training (ET) Monitor 2025, it reached 39.4% in 2024, representing an increase of 4.9 percentage points compared to 2023, bringing it in line with the EU average of 39.2% and close to Italy's national Barcelona target of 41.7% by 2030. Under the NRRP, EUR 3.7 billion has been invested, leading to the creation of 150,480 additional nursery places. These verified figures might be reflected in the Memorandum's assessment.

- **Paragraph 23**

“Italian authorities have adopted key strategies and multiple national plans either to alleviate poverty in general or to specifically address child poverty. Such plans have mainly been developed at sectoral level and based on specific EU obligations, rather than as part of a coherent nationwide strategy, and their implementation depends on interministerial and regional collaboration. Plans of particular relevance include the National plan for inclusion and fight against poverty 2021-2027, the National plan of interventions and social services 2024-2026, the Sixth national plan of action and interventions for the protection of the rights and development of individuals in developmental stages, and the 2022 National action plan for the implementation of the Child Guarantee. The latter is accompanied by significant financial support from the EU to enable Italy to implement relevant plans. Additional EU funds are deployed, together with national funds, to implement other national plans.”

It should be noted that the “Sixth National Action Plan for the Protection of the Rights and Development of Children and Adolescents” is complemented by the “National plan for the prevention of and response to the sexual abuse and exploitation of children 2025-2027”, within the framework of a common strategy. The above-mentioned National plans were adopted at central government level and are strategic planning instruments. More specifically, they set out a series of actions to be implemented at both national and local levels. Furthermore, the National plans are the outcome of a broad participatory process that actively involved a wide range of stakeholders from different sectors, including experts, representatives of central government authorities, law enforcement agencies and civil society organisations, all members of specific National Observatories (such as the National Observatory for children and adolescent and the Observatory for the prevention and fight of paedophilia and child pornography), operating at the Department for family policies of the Presidency of the Council of ministers. In addition, the implementation of the various National plans provides for monitoring and evaluation mechanisms.

Moreover, while Italy acknowledges that several national plans have been developed to implement specific EU obligations or address sector-specific priorities, this approach reflects a deliberate policy choice aimed at ensuring effectiveness, measurability and concrete implementation, rather than indicating the absence of an overarching strategic vision. In particular, the “Sixth National Action Plan for the Protection of the Rights and Development of Children and Adolescents” was developed following a comprehensive assessment of the implementation and results of the previous National Plan. In line with the principles of effectiveness and sustainability that guided the work of the National Observatory for Children and Adolescents, this evidence-based approach made it possible to ensure continuity for the most successful actions while designing new strategies based on lessons learned and emerging needs. The Sixth National Plan is structured around three strategic macro-areas, comprising a total of sixteen actions. Each action has been designed according to a common planning framework, with clearly defined objectives, implementation measures, responsible authorities, timelines and monitoring indicators. This methodology ensures that the actions are objectively measurable, realistically achievable within the lifetime of the Plan, and subject to regular monitoring and evaluation. Rather than reflecting fragmentation, the coexistence of thematic national plans allows Italy to address the different dimensions of children's rights through targeted and coordinated policy instruments, while ensuring interministerial cooperation and coherence across sectors. This approach enables the Government to respond effectively to the diverse needs of children and families, supported by robust monitoring mechanisms and evidence-based policymaking. The same approach has also been applied to the National Plan for the Prevention of and Response to the Sexual Abuse and Exploitation of Children 2025–2027.

- **Paragraph 30**

“The introduction of the AUU was unanimously praised by interlocutors met during the visit, as was the recently introduced possibility to combine it with the ADI. At the same time, it was noted that the amounts provided are not always adequate to the needs of families.”

Since its introduction, the AUU has been progressively strengthened through successive legislative measures. In particular, the amount of the benefit has been increased for large families, recognising the need to provide greater support to households with multiple children, which were not fully taken into account under the initial design of the scheme. These adjustments reflect the Government's commitment to continuously improving the effectiveness and fairness of the measure in light of its practical implementation.

- **Paragraph 35**

“The Commissioner welcomes the fact that the Italian authorities have recognised the interplay of different manifestations of child poverty and that they acknowledge the need for broad action, focusing not only on material poverty or specific manifestations, but also on multi-dimensional responses addressing the root causes. He notes that quality education, in its broader sense, represents an essential factor to address child poverty and its inter-generational transmission, as acknowledged by many interlocutors. He observes that close coordination of different actors – including multiple ministries, relevant regional and local authorities, as well as civil society organisations and local communities – is required to ensure that policy and programmes are designed and implemented in conformity with human rights obligations, that relevant data is exchanged, and that adequate resources are made available in a sustainable manner.”

The Italian Ministry of Labour and Social Policies has promoted Public Notice No. 1/2023 (Asylum, Migration and Integration Fund - AMIF 2021-2027) for the implementation of Regional Intervention Plans for the integration of third-country nationals. The Notice adopts a multilevel governance model, under which Regions and Autonomous Provinces engage local authorities, third-sector organisations and migrant associations as partners in the design and delivery of the Plans. Within this framework, the Notice funds measures relevant to migrant family units, including actions to counter educational poverty and support minors' skills, language training and work-life balance measures for women and newly-arrived minors, and measures against housing hardship such as housing mediation, social housing/co-housing support, family hosting, and rental contribution¹.

Additionally, as part of the general measures to improve the quality of education, the Ministry of Education and Merit recalls that new National Guidelines for the curriculum of pre-primary school and the first cycle of education have recently been issued, and that the Guidelines for general upper secondary education (so-called “*Licei*”) are being redefined.

The National Guidelines for the first cycle expressly frame the right to education, in the light of Article 3(2) of the Italian Constitution, as a challenge of removing the obstacles that prevent the full development of the person and of achieving educational success for all, starting with an early fight against educational poverty and against economic, social, cultural and linguistic disadvantage. Similarly, the documents regarding the integrated system for ECEC (National Guidelines for Early Childhood Education Services and Pedagogical Guidelines for the Integrated System 0-6 years) focus on the importance of an early education to fight against poverty. In particular, the Pedagogical Guidelines, in the section “Inequalities and Poverty”, underline the benefits of investing in early childhood education programmes, “as they are much more effective and less costly than subsequent interventions aimed at combating school dropout. Having a qualified set of educational services is a response to the right to a good individual and community life”.

- **Paragraph 36**

“Poverty and low educational attainment have largely reinforced each other, often influenced by factors such as birthplace, socio-economic status, citizenship, and gender, penalising people across generations. In this regard, Italy has experienced progress over the past decade – with significant

¹ See <https://integrazionemigranti.gov.it/it-it/Dettaglio-programma/id/78/Avviso-pubblico-multi-azione-n-12023>.

input and actions from civil society – around the concept of “educational poverty”, which is considered an entry point to breaking intergenerational poverty cycles.”

Italy has also made progress in the measurement of this phenomenon. In 2023, the Italian National Institute of Statistics (therein after ISTAT) established an inter-institutional scientific commission with the aim of defining and measuring educational poverty and identifying the territorial areas most affected by the phenomenon. The Commission defined educational poverty as a multidimensional concept, developed the conceptual framework, and identified 78 multi-source indicators of high statistical quality, calculated for the population aged 0-19².

- **Paragraph 37**

“The negative cycle of poverty is exacerbated by long-standing inequalities in formal education, given limited and unequal access to early childhood and quality primary education, and scarce availability of spaces for children and families to socialise, play sports, acquire skills through extra-curricular activities, or enjoy cultural events. The two dimensions are closely connected and often present in particularly deprived localities, such as areas of socio-economic hardship in urban peripheries. This recalls the importance of engaging the wider “educational community” – involving local authorities, schools, communities, families and civil society organisations.”

With reference only to the access to ECEC, Italy recalls that, despite geographical differences, in recent years the number of children accessing early childhood education has increased thanks to multiple sources of finances, one of them is the dedicated National Fund for Integrated system 0-6 within the jurisdiction of the Ministry of Education and Merit. Specifically, the ET Monitor 2025 states that “The percentage of children under three years of age enrolled in formal childcare is steadily growing. In 2024, the percentage of children aged 0-2 years enrolled in formal childcare reached 39.4%, up 4.9 percentage points compared to 2023. This rate is in line with the EU average of 39.2% and close to the national Barcelona target of 41.7% by 2030”. In order to meet the needs of territorial rebalancing of early childhood education, especially in the Southern regions, a portion of the mentioned National Fund has been annually reserved for areas with fewer places available in educational services. From 2018 onwards, this portion has gradually increased significantly. Overall, therefore, from 2018 to date, EUR 385,523,077.20 has been reserved solely for the purposes of territorial rebalancing of educational provision across the country.

Access to primary education in Italy is a universal and free right guaranteed to all minors, including children of foreign or undocumented migrants. In addition, all pupils, without any distinctions are entitled to participate in extra-curricular activities planned by schools. In complementarity and synergy with the 2021-2027 National Plan for Schools and Skills, the interventions financed by the NRRP, as outlined in the Futura programme, connect various national and European initiatives aimed at building a more innovative, sustainable, safe, and inclusive educational system with the primary objective to ensure the right to education, strengthen basic skills and competencies, enhance digital literacy, and equip students with the tools needed to face future challenges. The programme seeks to overcome disparities, reduce school dropout rates, and address educational poverty and territorial inequalities. In particular, Agenda *Nord* aims to overcome territorial disparities and to ensure equal learning opportunities for learners throughout the country. The main goal is to tackle early school leaving from primary school onwards, by actions focusing on the suburbs of large urban centres. Likewise, Agenda *Sud* aims to reduce the learning gap between Northern and Southern Italy and to ensure the same learning opportunities for students throughout the country. The main goal is to tackle early school leaving, starting with primary school, by actions targeted towards in schools located in Southern Italy.

Moreover, on this topic, in recent years the Italian Ministry of Labour and Social Policies has carried out a project about sport and integration, through the National Fund for Migration Policies, to promote access to sport in disadvantaged neighbourhoods and suburban communities with a high presence of migrants. The programme targeted migrant children and young people from economically disadvantaged backgrounds. It also promoted the participation of young people with a migrant background in sports, with the aim of overcoming stereotypes and cultural barriers that limit access to sporting activities³.

² See [Educational Poverty – Istat](#).

³ See <https://www.sportesalute.eu/sporteintegrazione.html>.

Furthermore, the Department for Family Policies has launched a number of public calls for proposals aimed, among other objectives, at promoting childcare and educational activities for children. For example, the public call “*Educare Insieme*”, EUR 65 million published in 2020, was addressed to third-sector organisations and schools and was intended to fund initiatives to combat educational poverty by promoting non-formal and informal education projects, including innovative and pilot initiatives, as well as recreational activities designed to empower children and adolescents, with a particular focus on children and young people aged 0 to 17 years. Under the public call “*Educare in Comune*”, also published in 2020, EUR 25,5 million the Department funded initiatives to combat educational poverty implemented by the municipalities awarded financial support. Under the public call for proposals “*Insieme si vince*”, published in 2025, EUR 6,2 million the Department for Family Policies provided funding, through the municipalities responsible for them, for activities carried out by publicly operated Family Centres aimed at preventing and combating all forms of sexual abuse and exploitation of children, including abuse and exploitation perpetrated online. It is also necessary to provide an overview of the funding system aimed at strengthening, at the municipality level, the implementation of socio-educational activities for children and adolescents. These measures constitute an important tool for combating educational inequalities and promoting social inclusion, in line with the observations made by the Council of Europe. From 2020 to 2025, approximately EUR 500 million was allocated overall to these activities, while from 2026 onwards the measure was made permanent by the latest Budget Law, with funding of EUR 60 million per year. In 2026, the allocation was further increased to approximately EUR 70 million.

- **Paragraph 38**

“Regarding inequalities in formal education, three major challenges have been identified. Firstly, there is limited and unequal access to nurseries, particularly in southern regions, which not only contributes to lower educational outcomes, but also restricts access to work for women, since women disproportionately carry the responsibility for looking after children. Secondly, there is limited and unequal access to school canteens, whereby children affected by food poverty may be unable to access at least one nutritious meal per day. In addition, since the absence of school canteens means children cannot access schooling in the afternoon, they lose a number of hours of schooling per year. Thirdly, there are long-standing issues with school dropouts, both in the form of “explicit” dropout (leaving school early) and in that of “implicit” dropout (completing school without basic skills).”

See also the former comment above.

Data recently published by EUROSTAT for 2025 on school dropout in Europe are extremely positive for Italy which stands at 8.2%, below the EU average of 9.1. The European target of a 9% dropout rate by 2030 has been achieved five years ahead of schedule.

Additionally, pursuant to Article 14 of Decree-Law No. 123 of 2023 (“Caivano decree”), as converted, with amendments, into Law No. 159 of 2023, the role of Family Centres has been strengthened. They are entrusted with providing counselling and services on media and digital literacy for children and adolescents, with particular attention to protecting them from exposure to pornographic and violent content due to the fact that such content undermines respect for their dignity, compromises their physical and mental well-being, and constitutes a public health concern.

- **Paragraph 39**

“The Commissioner welcomes reassurances from the authorities that several actions have been implemented in recent years to tackle these challenges. In particular, the Italian government has launched several initiatives focusing on infrastructure, digitalisation, and the reduction of regional disparities, leveraging resources from the EU-funded National Recovery and Resilience Plan (NRRP) and other EU funds, linked to the European Child Guarantee. These resources primarily target nursery expansion – linked to new LEPs set in 2021, guaranteeing access to nursery for at least 33% of children – the construction of school canteens, and the establishment of orientation services to prevent school dropouts. Authorities also pointed to the introduction of criminal sanctions against parents of children not attending school, through the so-called “Caivano decree”.”

Beyond EU-funded NRRP, since 2022, the Ministry of Education and Merit agreed to distribute the incremental resources of the Municipal Solidarity Fund (FSC), then the Special Fund for Equity in the Level of Services (FELS), under the Ministry of the Interior. This Fund is directly linked to achieving the Essential Performance Level (*Livello Essenziale di Prestazione* – LEP) of 33% of early childhood education services (EUR 825,000,000.00 from 2022 to 2025).

- **Paragraph 40 and footnotes 47-48**

“However, the Commissioner learned of concerns regarding the sustainability of funding to ensure the running of new nurseries and school canteens, insufficient resources allocated for free school meals in the absence of a specific LEP, and the adoption of targets that may perpetuate rather than address regional disparities. It was also indicated that schools do not receive adequate accompaniment in the provision of orientation services, that explicit school dropouts are not always accurately recorded, and that low educational attainment by students from disadvantaged backgrounds continues. The Commissioner further notes the potential impacts of school closures on school attendance. In the absence of adequate measures to tackle the social and relational factors underlying juvenile violence, including adequate education on affectivity and sexuality, the Commissioner also notes studies linking increased juvenile incarceration rates to security-related provisions introduced by the “Caivano decree”.”

Sustainability of funding for nurseries and school canteens

The Ministry of Education and Merit recommends that this assessment rely on actual verified data. While NRRP funds are aimed at the construction of new facilities, the National Fund for the Integrated System 0–6 — a structural fund under the responsibility of the Ministry — finances, *inter alia*, the contribution to the management costs of public and accredited private early childhood education services and pre-primary schools, also with the aim of reducing the economic participation of families (Legislative Decree No. 65/2017, Article 12(2)(b)). From 2018 to date, EUR 385,523,077.20 of this Fund has been reserved specifically for the territorial rebalancing of educational provision, with a portion annually dedicated to areas with fewer available places, especially in Southern regions. In addition, since 2022 the Ministry has agreed to the distribution of the incremental resources of the Municipal Solidarity Fund, subsequently the Special Fund for Equity in the Level of Services under the Ministry of the Interior, directly linked to the achievement of the essential performance level of 33% coverage of early childhood education services (EUR 825 million from 2022 to 2025).

Incorrect reference to the European ECEC target (footnote 47)

The statement that the Italian LEP for nurseries “lags behind the European Commission's revised goal of 50%” is factually incorrect. The revised target set by the Council Recommendation of 8 December 2022 is 45%, not 50%, and it applies as a variable target: for member states whose participation rate is between 20% and 33%, the target is calculated on the basis of the average ECEC participation rate for children under three achieved in 2017–2021 according to EU-SILC data. For Italy, the resulting target to be achieved by 2030 is 41.7% (and not the general target of 45%.) - a target which, as noted above, is close to being met.

Un sourced statement on orientation services (paragraph 40)

The indication that “schools do not receive adequate accompaniment in the provision of orientation services” appears supported by a limited reference to an appropriate source of information

Targeted interventions under *Agenda Sud* and *Piano Estate*, focusing on the most disadvantaged schools, have been implemented through specific actions, including mentoring and orientation for students (as of 2025, 820.000 students have been mentored and accompanied), extended learning time, and enhanced school–community cooperation. These measures, supported by NRRP investments, have contributed to reducing the early school leaving rate to 8.2% in 2025, as per official ISTAT data exceeding the NRRP target of 10,2% and the European target of 9%. In addition to ensure further support and sustainability the NP 2021–2027 “*Orientamento*” initiative has been introduced for a total of EUR136,147,500 for the 2024–2026 biennium, providing guidance pathways in lower secondary schools with the aim of accompanying students and reducing school dropout and early school leaving.

Unsourced statements on the recording of school dropouts (paragraph 40 and footnote 48)

The consideration that explicit school dropouts “are not always accurately recorded” and the reference to “incentives for schools to underreport dropouts” appear supported with limited sources of information that would be useful to ascertain. Indeed, according to the data published by EUROSTAT for 2025 the school dropout rates are extremely positive for our country. Italy stands at 8.2%, below the EU average of 9.1%, performing better than countries like Germany, at 13.1%, and Finland, at 9.9%. The European target of a 9% dropout rate by 2030 has even been exceeded, five years ahead of schedule.

Student attendance is systematically recorded in real time through the electronic register, the official monitoring tool, and the framework has been further strengthened by Law No. 159/2023 (the so-called “Caivano decree”), which establishes binding legal obligations and clearly defines procedures and responsibilities for schools and all relevant stakeholders.

The legislation reinforces the duty of schools to ensure continuous and accurate recording of student absences through the electronic register and requires the prompt activation of reporting and intervention mechanisms, without waiting until the end of a teaching period or term. This framework ensures the timely identification of at-risk situations, supports early intervention, and strengthens efforts to prevent school dropout, including through targeted support for students facing socio-emotional and economic difficulties, as well as tailored educational measures for students with special educational needs (SEN), which are implemented at school level and monitored at national level.

School closures and school attendance

With regard to the potential impact of the summer closure of schools, the Minister of Education and Merit has signed a EUR 300 million decree establishing the new Summer Plan, which provides recreational activities, skills-enhancement programmes and social opportunities during the summer period, with the aim of making schools a place of gathering, especially for children and young people who would otherwise lose a fundamental point of reference. Within their organisational autonomy, all schools may use the allocated resources to launch sports, musical, recreational and academic-enhancement projects promoting relationships, social interaction and group life.

Education on affectivity, respect and relationships

The observation concerning the alleged absence of “adequate education on affectivity and sexuality” does not reflect the existing framework. It is to be noted that sexuality education is a broad concept which can give rise to varying interpretations of its scope and content. In this regard, Italy prefers more specific terminology on the topic referring to sexual health and relationships education, grounded in a solid scientific evidence.

This should be understood, on the one hand, as the provision of information related to sexual and reproductive health and, on the other hand, as education on mutual respect between women and men within relationships, also with a view to preventing gender-based violence.

This approach is reflected in national policy instruments, notably the new Civic Education Guidelines (Ministerial Decree No. 183 of 7 September 2024), which expressly include respect for women and the prevention of gender-based violence among the learning objectives, and the initiative “*Educare alle Relazioni*”, promoted by the Ministry of Education and Merit to foster a culture of respect and healthy relationships in schools.

While Italy considers the family as the primary educational entity in matters related to sexual and reproductive health, this does not entail that such topics are excluded from education in the school system. Actually, in line with Law No. 104 of 9 June 2026 “Provisions Concerning Informed Consent in Schools”, these topics can be dealt with at school provided that families give their explicit prior consent regarding both contents and the external experts involved. This framework ensures the active involvement of families, in a spirit of shared educational responsibility between school and family.

Thus, education on respect and empathy is an integral part of learning at all school levels; the Civic Education Guidelines provide for instruction on respectful behaviours and relationships throughout the education system, with explicit objectives related to gender equality, respect for women and the prevention of all forms of violence; the new National Guidelines for the curriculum of pre-primary school and the first cycle of education, which will gradually come into force from the next school year, include a specific section dedicated to relationships, empathy and respect for others; and the biological aspects of sexual education, including reproduction, pubertal development and the risks of sexually transmitted diseases, are part of the science curricula nationwide. Law No. 22/2025 has furthermore introduced the development of non-cognitive and

transversal skills into school curricula, with a pilot project already launched by ministerial decree. These curricular measures are supported by systemic actions, including school psychological support services funded with over EUR 18 million per year and the programme “Educating for Respect and Equality”, developed with INDIRE under the National Programme “School and Skills 2021–2027”, which promotes a whole-school approach involving teacher training, school organisation and cooperation with families and communities.

Characterisation of the “Caivano decree”

At present, no official evidence or institutional dataset establishes a causal link between the provisions of the “Caivano decree” and rising juvenile incarceration or juvenile violence. By contrast, early institutional evidence points to positive effects in strengthening the prevention of school dropout and absenteeism, through clearer responsibilities assigned to schools, municipalities and families in ensuring compliance with compulsory education — a contribution consistent with the steady decrease of the ELET rate recalled above. Law No. 159/2023 reinforced monitoring and enforcement mechanisms by assigning clearer responsibilities to schools, municipalities, and families in ensuring compliance with compulsory education. In fact, as reported by ISTAT, the early school leaving rate (ELET indicator) in Italy has decreased, reaching 8.2% in 2025, compared to 9.8% in 2024 and 10.5% in 2023, moving below the EU 2030 target of 9% and NRRP target of 10,2% ahead of schedule.

The Ministry of Education and Merit invites a more balanced presentation of this measure, distinguishing its educational and monitoring components from considerations pertaining to the juvenile justice system, which fall outside the Ministry's remit.

- Paragraphs 48 and 49

“Children without Italian citizenship are also in a situation of particular disadvantage. As previously highlighted, not only is the incidence of poverty much higher among foreign households, but those households are also under-represented among beneficiaries of relevant allowances and services. This can happen because national and local legislation may condition access to anti-poverty measures – e.g. social housing and free school meals – with formal requirements that directly or indirectly privilege Italian nationals – such as that of holding Italian citizenship or a long-term residence permit,⁶¹ that of having resided for a certain number of years in Italy or in a specific region, or that of presenting evidence of not owning property abroad. While it is not unlawful to limit access to social rights for foreign nationals, minimum levels of subsistence have to be afforded to everyone, especially children, independently of legal status. In several cases, courts have ruled that the imposition of such requirements had been discriminatory and unlawful. Yet, their application, including in times of crisis, has led to significant cumulative effects over years, and in some cases requirements of this type continue to be applied. In this regard, the Commissioner acknowledges the existence of ombudspersons for children and adolescents at both national and local levels. However, he notes that weaknesses affecting the mandates, resources and powers of Italian human rights bodies mean that the protection of children’s rights rests largely on judicial actors, who are unable to redress violations rapidly.

Among foreign children, those who have arrived in Italy alone are at heightened risk of poverty.⁶² In past years, Italy has adopted legislative measures to protect unaccompanied children.⁶³ However, some legal protections have been weakened more recently,⁶⁴ or could be weakened on the basis of recent proposals,⁶⁵ and challenges remain in practice. For instance, unaccompanied children are sometimes required to stay in first reception centres for longer than necessary – on occasion subjected to unlawful detention and to poor material and hygienic conditions.⁶⁶ Furthermore, the appointment of legal guardians is not always prompt. In addition, municipalities and other actors assisting foreign children lack adequate resources to fulfil their responsibilities, and educational opportunities are not always provided”.

The reception system for unaccompanied foreign children, under national legislation (Legislative Decree No. 142/2015), constitutes a particularly complex governance model, characterised by collaboration and interaction among the various levels of territorial government bodies.

In particular, the decree provides the reception of UAC (Unaccompanied Children) shall being guaranteed in first-reception government facilities (Article 19, paragraph 1) for immediate rescue and protection needs, for

the time strictly necessary for identification and, where applicable, age assessment, as well as to receive information on their rights and protections. These facilities are funded through the Asylum, Migration and Integration Fund (AMIF).

The continuation of reception for the UAC hosted is ensured through their transfer to projects within the SAI (Asylum and Integration System) network.

Temporary reception facilities (Article 19, paragraph 3-bis) are also falling under first reception, exclusively dedicated to UAC, activated by Prefects in the event of large and successive arrivals (CAS – Extraordinary Reception Centres), as well as dedicated sections within adult centres to temporarily accommodate UAC older than sixteen years, for a period not exceeding 150 days.

The central role, as outlined by the legislator, for the reception of UAC is played by the second-reception projects of the SAI network (Article 19, paragraph 2), funded with resources from the National Fund for Asylum Policies and Services (FNPSA).

The placement of UAC in facilities not specifically intended for children constitutes an exceptional and temporary measure, activated exclusively in cases of the immediate unavailability of places in dedicated facilities or in the SAI UAC circuit.

Such situations are subject to constant monitoring by the Prefectures and the Ministry of the Interior, with the aim, among others, at ensuring timely transfer to dedicated facilities.

The public reception system, on a territorial base, was born with the Protection System for Asylum Seekers and Refugees (SPRAR), established by Law No. 189 of 30 July 2002, as an evolution of the National Asylum Programme promoted by the Ministry of the Interior, ANCI (National Association of Italian Municipalities), and UNHCR.

SPRAR progressively arose as a model of integrated reception, managed by local authorities and funded through the National Fund for Asylum Policies and Services (FNPSA), providing not only mere hospitality but also integration services, legal advice, healthcare, linguistic-cultural mediation, training, and social inclusion. With Law Decree No. 113 of 4 October 2018, converted by Law No. 132 of 1 December 2018, the system has been reformed with the new name of SIPROIMI (Protection System for Holders of International Protection and for Unaccompanied Foreign Children).

The reform narrowed the pool of ordinary beneficiaries to holders of international protection, holders of special protection (within the limits provided for by current legislation), and, above all, maintained the enhanced protection for Unaccompanied Foreign Children (UAC), recognising their peculiar vulnerability.

Later, Law Decree No. 130 of 21 October 2020, converted by Law No. 173 of 18 December 2020, redefined the system by introducing the SAI – Reception and Integration System, currently under Article 1-sexies of Law Decree No. 416/1989.

The SAI structure is articulated through different reception levels; indeed, Article 1-sexies of Law Decree No. 416/1989 provides the access (within the limits of available places) for applicants for international protection, only in specific cases according to the law and in case of applicants belonging to the vulnerable categories referred to in Article 17 of Legislative Decree No. 142 of 18 August 2015: children, unaccompanied children, disabled persons, the elderly, women, with priority for pregnant women, single parents with underage children, victims of trafficking, persons suffering from serious illnesses or mental disorders, persons who have suffered torture, rape, or other serious forms of psychological, physical, or sexual violence, or violence related to sexual orientation or gender identity, and victims of genital mutilation.

In these last years, the reception capacity for UAC within the SAI has increased, rising from 4,255 places as of 31 December 2019 across 166 projects to 7,028 places as of 31 December 2025 across 206 projects (+65.2% in reception places). By ministerial decree No. 12585 of 19 March 2025, 65 projects were authorized to expand by 1,000 places.

On a subsidiary basis, in the event of the temporary unavailability of the aforementioned facilities, Municipalities and the other local bodies remain obligated to temporarily ensure assistance and reception for the children (Article 19, paragraph 3), without prejudice to the possibility of being transferred to another municipality, in compliance with the protections provided for by Law No. 47/2017, taking primarily into consideration the best interests of the child, the fundamental principle of the UN Convention on the Rights of the Child (CRC).

The evolution, from SPRAR to SIPROIMI and finally to SAI, highlights the progressive consolidation of a territorial reception model based on the integrated care of the individual.

Within this evolution, Unaccompanied Foreign Children and children belonging to households and single-parent households represent the category most protected by national legislation, according to constitutional principles, the UN CRC, Legislative Decree No. 142/2015, and Law No. 47/2017.

The implementation of the European Pact on Migration and Asylum, through Law Decree No. 100/2026, introduces a new procedural framework that must continue to ensure the full protection of children's rights.

Law No. 47/2017 provides for enhanced protection instruments for unaccompanied minors, including the appointment of a guardian and the involvement of social services and the juvenile judicial authority.

Pending the appointment of the guardian, the head of the reception facility may exercise guardianship powers in relation to procedures for the residence permit and international protection (Article 6, paragraph 3, of Law No. 47/2017, in conjunction with Article 3 of Law No. 184/1983).

Additionally, on the topic, the Italian Ministry of Labour and Social Policies has implemented initiatives to support their social and labour inclusion during the transition to adulthood. Among these, the *Percorsi* project (funded through the European Social Fund (ESF), the National Operational Programme (NOP) Legality) has provided integrated support services including tutoring, career guidance, job-search assistance, skills assessment and certification, and six-month extracurricular internships with host companies for unaccompanied foreign minors aged 16 and over. The project has also promoted the active involvement of relevant institutional and local stakeholders in facilitating participants' transition to autonomy and employment⁴

- ***Footnote 67 about data on unaccompanied foreign minors in Italy***

Please consider the more updated data that as of 31 May 2026, 14,237 unaccompanied foreign minors were recorded by the Italian authorities as present in the country, mostly nationals of Egypt (33,1%), Ukraine (17,2%), Bangladesh (12,1%), Gambia (5,7%), and Tunisia (5,1%). Their age distribution was as follows: 17 years old (56,9%), 16 (20,9%), 15 (8,1%), 7-14 (12,7%), and 0-6 (1,2%). The regions hosting the most were Sicily (19,5%), Lombardy (13,4%), Campania (12,2%) and Emilia-Romagna (7,4%). Data from Ministry of Labour and Social Policy⁵.

- ***Paragraph 50.***

“The Commissioner recommends that the Italian authorities, at national, regional and municipal levels, give priority attention to the goal of eradicating child poverty and its intergenerational transmission, in particular through: Specific programmes for children with particular disadvantages, designed and executed in partnership with local administrations, civil society organisations, communities, and rights holders, albeit under the overall responsibility of national authorities.”

With a view to strengthening support measures for vulnerable migrants, including unaccompanied foreign minors, a new programme has been launched providing for the establishment of sports and educational centres. These centres aim to ensure free access to sports activities for children and young people who would otherwise be unable to participate due to financial constraints. The programme defines these centres as inclusive community spaces that promote both sports and educational activities, while also fostering social cohesion and strengthening the resilience of local communities.

⁴ See <https://integrazionemigranti.gov.it/it-it/Ricerca-news/Dettaglio-news/id/3556/Minori-stranieri-non-accompagnati-disponibili-750-doti-del-progetto-Percorsi-4>.

⁵ See <https://analytics.lavoro.gov.it/t/PublicSIM/views/HomePage/HomePage-SIM?%3Aembed=y&%3Aiid=1&%3AisGuestRedirectFromVizportal=y>

2. Recommendations (Section VII) – Comments from the Ministry of Labour and Social Policies.

“The Commissioner recommends that the Italian authorities, at national, regional and municipal levels, give priority attention to the goal of eradicating child poverty and its intergenerational transmission, in particular through:

▪ The coordination of all relevant initiatives and programmes through a specific, human rights based national plan to eradicate child poverty.”

The Memorandum highlights the need to strengthen a comprehensive national strategy to tackle child poverty, noting that the various initiatives adopted by Italy are still characterised by a prevalent sectoral approach and a high level of institutional fragmentation. This analysis captures a feature that has indeed characterised the historical evolution of the Italian social policy system, which has been deeply influenced by the constitutional distribution of powers between the State, the Regions and local authorities, and by the gradual establishment of a multi-layered system of financial and planning instruments, which have also developed in response to specific European initiatives.

However, this evaluation does not appear to take full consideration of the significant reform process launched in recent years, which is specifically aimed at overcoming the fragmentation of policies and building a unified system to guarantee social rights. Today, the national strategy is no longer based on a simple aggregation of programmes, funds or initiatives dedicated to individual population groups, but on the gradual development of a stable local welfare infrastructure, in which economic measures, social services, educational initiatives, social and health policies, and programmes funded by European funds all contribute to the implementation of a unified plan. It is in this light that the 2024–2026 National Plan for Social Interventions and Services, the National Plan for Inclusion and the Fight against Poverty, the National Plan for the Implementation of the Child Guarantee, the 2021–2027 National Inclusion Programme and others national programmes deserve specific attention: they do not constitute autonomous and independent instruments, but rather components of a single planning framework.

The main element of innovation lies precisely in the gradual move away from the logic of category-based policies towards a system based on the implementation of the minimum levels of provision (*Livelli Essenziali di Prestazione* - LEPs), which represent the common framework for the entire national planning process.

Italy’s current approach is geared towards creating a system that no longer regards individual programmes as the central element of public policy, but which instead prioritises the uniform guarantee of social rights throughout the country, through the establishment of common standards in organisational, professional and performance matters. In this context, the recent introduction, through Law No. 199 of 30 December 2025, of the LEPs Guarantee System represents a particularly significant development in the legal framework. For the first time, in fact, national legislation provides for a mechanism that structurally links the setting of LEPs with financial planning and the gradual definition of criteria for the allocation of resources, by identifying the levels of expenditure required in each Territorial Social Area to ensure the effective provision of LEPs. This innovation addresses one of the main challenges historically highlighted by international bodies, namely the difficulty of ensuring equal access to social services given the varying organisational and financial capacities of local authorities. From this perspective, the Italian system is gradually shifting from a predominantly redistributive approach to one focused on guaranteeing rights, in which financial resources, the organisation of services, the strengthening of professional expertise and local planning are aligned towards achieving common and measurable service objectives. Furthermore, the decision to designate the Territorial Social Areas as the standard level for the planning, management and implementation of social policies appears particularly significant. This decision makes it possible to overcome municipal fragmentation and promote integrated governance able to link social services, social and health services, educational institutions, educational services, employment services and the third sector, thereby effectively realising the multidisciplinary and multi-level approach advocated by the Commissioner. The implementation of the Child Guarantee itself is fully in line with this strategy. Contrary to what might be assumed from the Memorandum, it does not constitute a stand-alone programme, but represents one of the strategic priorities of the National Plan for Social Interventions and Services, and is implemented through standard national and territorial planning instruments, the enhancement of the LEPs and integration with resources from the National Inclusion Programme and national funds.

In light of these elements, it is considered that the Memorandum accurately describes the objectives that a modern social protection system should pursue, but does not fully recognise the fact that Italy has already

undertaken a process of institutional reform specifically aimed at achieving these objectives. This ongoing process aims, in fact, to transform a set of sectoral policies into an integrated national system for guaranteeing social rights, based on the progressive implementation of the LEPs, the strengthening of the Territorial Social Areas, and the structural integration of economic measures, social services, educational services and social and health services.

“▪ Legislative measures addressing existing geographic disparities through the determination of adequate LEPs.”

The Memorandum emphasises the need to ensure equal access to social rights throughout the country, highlighting the fact that significant regional disparities persist in the provision of social, educational and social-health services, and referring in this regard to the previous conclusions of the European Committee of Social Rights, which had noted the absence of a comprehensive and coordinated approach to combating poverty and social exclusion.

In order to address these critical issues systematically, the national legislature has, in recent years, embarked on a gradual process of establishing the system of minimum levels of provision (LEPs), culminating in the adoption of Law No. 199 of 30 December 2025, which introduces the System for guaranteeing LEPs. This legislative measure represents one of the most significant institutional innovations in the social policy system since the constitutional reform of 2001.

For the first time, in fact, the legislator does not merely identify the social rights to be guaranteed or the LEPs to be provided to citizens, but introduces a permanent system designed to ensure that these rights can be effectively enforced by determining the levels of expenditure required for their provision within the Territorial Social Areas. The new Guarantee System thus overcomes a barrier that had long characterised the national debate on LEPs, namely the difficulty of transforming the formal recognition of rights into a real capacity by local authorities to make them effectively enforceable.

The reform introduces a radically innovative model, based on three closely integrated elements.

- 1) It links the determination of LEPs to the setting of reference expenditure levels, overcoming the traditional separation between the recognition of a right and the availability of the resources necessary for its implementation.
- 2) It provides that the gradual development of the criteria for allocating national funds intended to finance the Guarantee System should take into account not only historical expenditure, but also the actual needs of local areas, the number of beneficiaries of the benefits, and the objective of progressively reducing regional inequalities, thereby promoting a fair distribution of resources. This is a particularly significant step, as it progressively steers social funding towards criteria consistent with the principle of substantive equality set out in Article 3 of the Italian Constitution.
- 3) The Guarantee System adopts the Territorial Social Area as its standard level of planning and management, recognising it as the institutional body best suited to ensuring the integration of social, health, educational and employment services and to guaranteeing a unified approach to supporting individuals and families.

The establishment of the Guarantee System also forms part of a process already initiated by Law No. 234 of 2021, which recognised numerous LEPs in the social sector, and by subsequent legislation that has progressively strengthened professional social work, professional supervision, supported discharges, emergency social intervention, the prevention of the removal of minors from their parents and support for care at home. Law No. 199 of 2025 therefore represents the natural culmination of this process, introducing a unified framework capable of bringing together the various regulatory innovations introduced in recent years. Furthermore, the legislator's decision to include within the Guarantee System not only the LEPs already identified by current legislation, but also those relating to the new multidisciplinary teams comprising psychologists and professional socio-pedagogical educators, as well as the essential level of social home care for people who are not self-sufficient, appears particularly significant. In this way, the Guarantee System does not merely define a set of services to be provided, but directly addresses the organisational conditions necessary for these services to be delivered in practice, recognising that the effective realisation of social rights also depends on the availability of adequate professional staff, a stable organisation of services and funding consistent with the needs of local areas.

In light of these innovations, it is considered that the Memorandum does not fully recognise the scope of the recently approved reform, which represents the Italian legal system's structural response to the observations made over the years by international bodies regarding the need to ensure greater territorial uniformity, strengthen coordination between levels of government and guarantee the effective enforceability of social rights.

Rather than a mere revision of the criteria for funding services, the LEPs Guarantee System in fact constitutes a genuine national infrastructure for guaranteeing social rights, aimed at progressively aligning the planning, funding, organisation and monitoring of social policies with common standards of protection throughout the country.

“▪ Structural policy measures to be implemented in an integrated way by all relevant ministries and levels of administration to ensure the effective provision of adequate support. These should address, inter alia:

o Provision of sufficient, accessible allowances to ensure the effective fulfilment of the right to an adequate standard of living for all, without excluding households that cannot autonomously provide for themselves, irrespective of their composition, and while adopting adequate structural measures to address the issue of in-work poverty.”

The National Inclusion Allowance (*Assegno di inclusione* - ADI) programme is aimed at combating poverty by providing income support and integrating beneficiaries into inclusion and vocational training programmes, as well as active labour market policies. The ADI is granted to households that meet specific economic, income, residential, citizenship, and residency requirements and that include members with disabilities, minors, individuals aged 60 or older, or those in disadvantaged circumstances who are enrolled in care and assistance programmes. The financial support consists of one component calculated to supplement family income, up to the threshold defined by law, and another component intended to contribute toward rent expenses for households renting under a duly registered lease agreement. This is a targeted measure that replaced the Citizenship Income (*Reddito di Cittadinanza*), shifting from a universal subsidy to a category-based measure. Nevertheless, while coverage for the most vulnerable groups has decreased, the measure ensures greater adequacy as a result of the raised eligibility thresholds. In this regard, the 2025 Budget Law provided for an increase in the ISEE (*Indicatore della Situazione Economica Equivalente* - Equivalent Economic Situation Indicator) eligibility threshold from EUR 9,360 to 10,140 and in the family income threshold from EUR 6,000 to 6,500 per year. Specifically, regarding the ISEE, Article 1, paragraph 208, raised the exemption for owner-occupied housing and introduced new adjustments to the equivalence scale for children in the household for the purpose of accessing specific family benefits and inclusion benefits, including the Inclusion Allowance, thereby making the calculation of the indicator more favourable for large families and allowing for an expansion of the pool of potential beneficiaries. Specifically, the exclusion threshold for owner-occupied homes (used as a residence) in the calculation of the asset indicator was raised from EUR 52,500 to 91,500. The threshold has been further increased to EUR 120,000 for households residing in the capital cities of metropolitan areas, with an additional EUR 2,500 added for each cohabiting child beyond the first (under current legislation, the same additional amount is provided for each additional cohabiting child beyond the second).

For households entirely composed of individuals aged 67 or older (or of such individuals and other family members who are all in a state of severe disability or lack of self-sufficiency), the household income threshold has been raised from EUR 7,560 to EUR 8,190 per year, still multiplied by the equivalence scale parameter. In any case, the threshold has been raised to EUR 10,140 if the household resides in rented housing. The income supplement for renting households has also been increased from EUR 3,360 to 3,640. For households living in rental housing consisting entirely of individuals aged 67 or older and other family members who are all severely disabled or non-self-sufficient, the amount has been raised from EUR 1,800 to 1,950. In this regard, data from the INPS (*Istituto Nazionale della Previdenza Sociale* - National Institute for Social Security) Observatory on the Inclusion Allowance, updated through December 2025, confirm an expansion of the pool of potential beneficiaries of the measure in 2025, following the regulatory changes described above. Specifically, 767,731 households received at least one month's worth of the Inclusion Allowance in 2024, reaching 1,845,906 individuals, with an average monthly payment of EUR 616. In 2025, 832,879 households received at least one month of benefits, reaching 1,956,432 individuals, with an average benefit amount of EUR 755.

Furthermore, in order to ensure that efforts to combat poverty and social exclusion are stepped up, and taking into account the results of the ongoing monitoring of the measure, Decree-Law No. 92 of 26 June 2025 – converted, with amendments, by Law No. 113 of 1 August 2025, containing “Urgent measures to support productive sectors and provisions in the field of labour and social policies”, an additional one-off payment of up to 500 euros had already been provided for in 2025 for households due to receive their eighteenth monthly benefit payment, subject to the submission of a renewal application by the end of 2025 and fulfilment of the eligibility criteria. Following the entry into force of Article 1, paragraph 159, of Law No. 199 of 30 December 2025 (“2026 Budget Law”), the additional one-off ADI payment intended for beneficiaries who, in 2025, completed their first 18 months of ADI entitlement and received the first instalment of the renewal by December, was also granted to those who completed the 18-month period in November.

Article 1, paragraph 158, of the 2026 Budget Act has also amended paragraph 2 of Article 3 of Decree-Law No. 48/2023, removing, with effect from 1 January 2026, the one-month suspension period following the expiry of the first eighteen monthly instalments and the individual twelve-month renewal periods, thereby ensuring, among other things, that households receiving the ADI continue to receive financial support.

There are also significant developments with regard to the interaction between the Inclusion Allowance and the Universal Basic Allowance (AUU). Indeed, unlike under the Citizenship Income scheme, the Inclusion Allowance can be combined with the Universal Child Allowance (AUU), the financial support provided to families with dependent children, paid for each child up to the age of 21 (subject to certain conditions) and with no age limit for children with disabilities. Given that it can be fully combined with the Universal Allowance, the component of the ADI benefit payable where there are minor children – through the application of the relevant parameter in the equivalence scale – effectively acts as a supplement to the Universal Allowance, making it more generous. In particular, given the higher amount that the AUU provides for children beyond the second, it allows for more generous support to be provided right from the first child.

Finally, at the regional level too, in certain cases, regional legislators have introduced anti-poverty measures administered by local authorities, which can be combined with the national measure in order to offset regional disparities in the cost of living.

“o Sustained efforts to ensure that social services are well-coordinated and designed to coherently assist children living in poverty and their families, addressing the multiple manifestations of poverty, including by removing barriers to accessing adequate housing, food, social assistance and psychological care.”

The Memorandum rightly draws attention to the need to ensure enhanced protection for children and adolescents living in particularly vulnerable circumstances, emphasising that policies to combat poverty must pay particular attention to single-parent families, children with disabilities, migrant children, minors from the Roma, Sinti and Caminanti (RSC) communities and, more generally, to family situations characterised by economic and social fragility.

The general approach of the Memorandum is fully commendable as it recognises the multidimensional nature of child poverty and the need to develop measures that go beyond mere financial support. However, it is worth highlighting that the evolution of the Italian welfare system has gradually moved away from an approach centred on specific target groups, shifting towards a model of integrated support for the entire household, based on a multidimensional assessment of needs and the uniform guarantee of social rights.

The Italian legal framework is, in fact, based on the understanding – widely established in international scientific literature and referred to in the European Commission’s Recommendation ‘Investing in Children to Break the Cycle of Social Disadvantage’ – that child poverty is not a stand-alone phenomenon, but rather the most obvious manifestation of the vulnerability of the entire household. Economic circumstances, the quality of family relationships, parents’ level of education, housing conditions, health, access to educational services, participation in community life and opportunities for inclusion are all factors that are closely interdependent and require a coordinated response from the social services system.

From this perspective, the protection of children cannot be effectively achieved through sector-specific measures or those aimed exclusively at the child, but requires coordinated action capable of strengthening the entire family and community context in which children grow up and develop their abilities. It is precisely this rationale that informs the new Italian system for combating poverty and social exclusion.

The Inclusion Allowance, in fact, is not merely an income support measure, but rather a tool for inclusion based on a multidimensional approach to supporting the household. The financial benefit is accompanied by the establishment of a Social Inclusion Agreement, developed on the basis of a comprehensive assessment of

the household's needs and implemented through the integrated involvement of social services, social and health services, educational services, employment services, and other relevant institutional entities. In this context, minor family members are not considered to be merely indirect beneficiaries of financial support but are an integral part of the personalized plan, within which their educational, relational, health, and developmental needs are assessed in order to develop a unified support pathway for the entire household.

A particularly significant aspect is the specific attention given to households with children during their first 1,000 days of life. In such situations, the Services Component of the Poverty Fund provides for the implementation of parenting support programmes and the involvement of multidisciplinary teams, based on the understanding that early, preventive interventions aimed at strengthening parenting skills are significantly more effective in preventing the onset of situations of severe vulnerability than subsequent interventions of a purely remedial nature.

This approach reflects a deliberate public policy choice. The aim is not merely to alleviate the effects of poverty, but to break the cycles through which social disadvantage tends to be passed down from one generation to the next, by strengthening the protective factors within the family and the community and by promoting conditions conducive to a child's development from the earliest stages of life.

In this context, the Essential Levels of Social Services relating to the prevention of children being removed from their families are also particularly important; these place the child's right to grow up, where possible, within their own family environment at the heart of public intervention, through support for parenting skills, the strengthening of local networks and the development of integrated interventions between social, health, educational and school services. The national programmes implementing the Child Guarantee, including DesTEENazione and initiatives aimed at Roma, Sinti and Caminanti minors, also form part of this same strategy, promoting a community-based approach that integrates services, schools, families and the third sector. It is also necessary to highlight a more general aspect which constitutes one of the main directions of development for the Italian system and which, in the view of this Administration, is not fully reflected in the Memorandum.

The analysis carried out by the Commissioner continues, in fact, to attribute child poverty predominantly to a variety of categories of particular vulnerability, referring to specific measures aimed at different target groups. Whilst agreeing with the need to ensure particular attention is paid to children most at risk of social exclusion, the Italian system is gradually evolving towards a different paradigm, based not on the proliferation of category-specific policies, but on the establishment of a universal system for guaranteeing social rights. The introduction of the LEPs Guarantee Scheme, the strengthening of the Territorial Social Areas, the expansion of multidisciplinary teams, the integrated support provided under the Inclusion Allowance, the interventions funded through the Services Allocation of the Poverty Fund, and the implementation of the Child Guarantee are, in fact, complementary components of a single welfare framework.

Under this model, it is not membership of a particular category that determines entitlement to public support, but rather the state of need identified through a multidimensional assessment of the individual and their household. All children are recognised as having the same fundamental social rights, guaranteed through the Essential Levels of Social Provision; what varies is the intensity of the support provided, which is tailored according to the complexity of the needs and vulnerabilities identified.

This is an approach that can be described as universal and proportionate to need, in which universality concerns the recognition of rights, whilst the differentiation of interventions constitutes the means by which the principle of substantive equality enshrined in Article 3 of the Italian Constitution is effectively realised.

From this perspective, child poverty is not addressed as a problem affecting specific categories of children, but as a multidimensional situation requiring an integrated response from the entire welfare system – one capable of combining financial support, local services, educational initiatives, parenting support, the integration of social and health care, the strengthening of local communities, and the promotion of participation by children and adolescents.

In light of these factors, it is considered that the Memorandum correctly identifies the need to strengthen measures in support of vulnerable children, but does not fully recognise the significant paradigm shift that characterises the current evolution of the Italian social policy system. The reforms recently adopted are, in fact, aimed not only at expanding the range of support measures available, but also at building a permanent infrastructure to guarantee social rights, within which tackling child poverty is the responsibility of the entire welfare system rather than the sum of sector-specific measures targeting individual groups of beneficiaries.

“o Specific programmes for children with particular disadvantages, designed and executed in partnership with local administrations, civil society organisations, communities, and rights holders, albeit under the overall responsibility of national authorities.”

The Memorandum highlights the need to strengthen coordination between the various institutional levels and amongst the stakeholders involved in policies to combat child poverty, emphasising that the effectiveness of interventions depends on the ability to integrate the actions of the State, the Regions, local authorities, schools, social services, health services, the third sector and local communities. This need is fully recognised and constitutes one of the central pillars of the reform process launched by Italy.

In this context, the strengthening of the Territorial Social Areas (ATS) represents a fundamental strategic choice. The ATSs are no longer conceived merely as functional groupings of local authorities for the joint management of services, but as the standard territorial level through which to implement the Essential Levels of Social Services, plan the integrated use of resources, organise multidimensional care and ensure greater uniformity in access to services.

This approach directly addresses one of the critical issues highlighted by the Memorandum, namely the existence of significant regional disparities in the provision of services and in the administrative capacity of local areas. Strengthening the ATSs makes it possible to overcome municipal fragmentation – which is particularly problematic in areas characterised by small municipalities, limited administrative capacity or greater social vulnerability – by promoting an organisational structure better suited to the planning, management and evaluation of social interventions. Law No. 199 of 30 December 2025 consolidates this approach, stipulating that the LEPs Guarantee System is to be determined within each Territorial Social Area as the level of expenditure necessary to progressively guarantee essential services. In this way, the ATS becomes the link between the recognition of rights, financial planning, the organisation of services and the monitoring of the actual provision of services. This is a significant step forward at an institutional level as well. The guarantee of social rights cannot, in fact, be entrusted solely to the statutory provision of individual benefits, but requires a local body capable of translating these benefits into services that are effectively accessible to individuals and families. The ATS thus becomes the administrative framework through which the principle of substantive equality can be progressively put into practice across the country. The 2024–2026 National Plan for Social Interventions and Services further strengthens this function, identifying the implementation of the LEPs as a central objective in order to guarantee uniform and effectively enforceable essential services throughout the country. The Plan complements the National Social Plan and the Plan for Social Interventions and Services to Combat Poverty, as well as the allocation of the National Fund for Social Policies and the Fund for Combating Poverty and Social Exclusion, with total resources amounting to approximately 3 billion euros over the three-year period. The strengthening of the ATS takes on particular significance with regard to child poverty. The vulnerabilities faced by children and adolescents cannot be addressed through isolated or purely sector-specific interventions, but require a local system capable of integrating financial support, professional social work, parenting support, local education provision, schools, social and health services, housing policies, employment services and community networks. From this perspective, the ATS is the institutional framework within which the care of the entire family unit can be effectively provided. It is at this level that personalised support plans can be developed, taking into account both the child’s needs and those of the family, thereby avoiding the fragmentation of support measures across different administrative bodies and ensuring continuity of care.

A similar central role for the ATS is evident in the implementation of the Child Guarantee. The Directorate’s contribution highlights that the 2024–2026 National Plan for Social Interventions and Services adopts the Child Guarantee as a strategic guideline, integrating it with other national programmes and with the implementation of the LEPs, with a view to combating child poverty and ensuring access to essential services for vulnerable children.

In light of these factors, it is considered that the Memorandum correctly identifies the need to strengthen multi-level coordination, but does not fully recognise the role that the Territorial Social Areas are assuming within the new Italian framework. The ongoing process is not limited to improving coordination between institutional bodies, but aims to build a genuine territorial infrastructure for social rights, in which the ATSs act as the link between national planning, financial resources, professional standards, multidimensional care provision and the practical implementation of the LEPs.

The Memorandum rightly emphasises that tackling child poverty requires integrated policies capable of simultaneously addressing the various dimensions of the well-being of children and adolescents, highlighting in particular the role of education, health, nutrition, housing, social participation and access to local services. It also highlights the need to strengthen coordination between the various levels of government and between the relevant authorities so that the implementation of the European Child Guarantee can result in genuinely effective and sustainable measures. This approach is fully endorsed. However, it should be noted that the Italian strategy has gradually moved beyond a conception of the Child Guarantee as a set of sectoral measures aimed at children, shifting towards the full integration of the Child Guarantee into the regular planning of social policies.

The National Action Plan for the implementation of the Child Guarantee, adopted in 2022, is not, in fact, a programme separate from other national policies, but rather a structural component of the broader strategy to strengthen the local welfare system. As highlighted in the report prepared by the Directorate-General, the Child Guarantee is one of the strategic priorities of the National Inclusion Plan and is fully integrated into the National Plan for Social Interventions and Services 2024–2026, which identifies the fight against child poverty as a cross-cutting objective of the entire national planning framework. This decision appears particularly significant from an institutional perspective. It effectively overcomes the risk that the Child Guarantee might be implemented exclusively through projects funded by European resources, instead embedding it permanently within the regular planning of social services and the process of implementing the Essential Levels of Social Provision (LEPS). In other words, the Child Guarantee is not an additional programme to the Italian social policy system, but is now one of the main guiding principles of national and local planning. The integration of the Child Guarantee, LEPS, the National Plan for Social Interventions and Services, and the National Inclusion Programme makes it possible to develop a unified strategy in which the various financial and planning instruments work together to achieve the same objectives.

In this context, the national programme ‘DesTEENazione – *Desideri in azione*’ takes on particular significance. The initiative, funded with over 313 million euros through the National Inclusion Programme and the National Metro Plus Programme, involves the creation of 92 multi-purpose spaces across the whole country, aimed at adolescents aged 11 to 17 and young people up to the age of 21.

The most innovative aspect of the programme lies in the fact that it has overcome the traditional fragmentation between educational services, social services, psychological services, cultural activities and career guidance, by bringing these functions together within a single local facility. These multifunctional spaces are not merely physical venues for extracurricular activities, but genuine local community welfare centres, designed to provide adolescents with integrated access to educational, psychological, social, career guidance, cultural and participatory services. The aim is not merely to offer new activities for young people, but to build local environments capable of identifying situations of vulnerability at an early stage, encouraging the active participation of adolescents, strengthening local educational networks and promoting personalised pathways towards growth, autonomy and social inclusion.

From this perspective, DesTEENazione represents a practical application of the principle – also referred to in the Memorandum – that tackling child poverty requires a multidimensional approach capable of addressing, simultaneously, the various determinants of the well-being of children and adolescents.

The governance model set out in the programme also appears to be particularly significant.

The initiatives are, in fact, implemented by the Local Social Services through local partnerships involving schools, social and health services, third-sector organisations, cultural institutions, local communities and other public and private bodies. This approach moves beyond the traditional focus on individual services and promotes a shared responsibility across the entire educational community for children’s development.

A similar approach characterises the public call for proposals aimed at minors from the Roma, Sinti and Caminanti (RSC) communities, developed as part of the ‘Child Guarantee’ priority of the National Inclusion Programme. The initiative is based on an integrated, local approach that moves beyond the traditional logic of sector-specific interventions, promoting the development of personalised pathways to inclusion through the coordinated involvement of schools, social services, social and health services, families, third sector organisations and local communities. The aim is not merely to encourage school attendance or to tackle specific forms of marginalisation, but to address the multiple factors that fuel processes of social exclusion, by strengthening families’ educational capacities, supporting children’s participation in community life and improving access to local services. From this perspective, inclusive education is one of the means by which to promote a broader process of social inclusion and the full exercise of citizens’ rights.

Traditionally, most policies aimed at children have focused primarily on early childhood or on the protection of minors in situations of severe vulnerability. DesTEENazione, on the other hand, introduces a national investment specifically dedicated to adolescence, recognising this stage of life as a crucial time for preventing the onset of social exclusion, early school leaving, psychological distress, social isolation and educational deprivation. This approach is consistent with the latest scientific evidence, which identifies adolescence as one of the periods in which preventive interventions can have the greatest impact on people's future well-being. In light of these factors, it is considered that the Memorandum correctly identifies the need to strengthen educational and community-based interventions for children and adolescents, but does not fully capitalise on the significant paradigm shift introduced by Italy. The national strategy is not, in fact, limited to funding new services or projects, but aims to build a stable infrastructure for educational and community welfare, within which the Child Guarantee serves as the guiding principle for the entire national and local planning framework.

“▪ The sustained allocation of adequate funds to enable the implementation of LEPs and policy measures – including after the expiration of EU funds linked to the NRRP – as well as of programmes tackling child poverty.”

The Memorandum highlights how the effectiveness of policies to combat poverty depends to a significant extent on the availability of an adequate number of qualified professionals, drawing attention to the persistent shortage of social workers, psychologists and other specialist staff in local services, and emphasising how this situation may limit the public system's ability to ensure the timely and effective support of individuals and families in vulnerable circumstances. This observation highlights an issue of undoubted importance, which is also fully recognised by the Italian authorities.

It should be noted, however, that the reform process currently under way is not aimed solely at increasing the number of staff in local services, but pursues a broader objective: the gradual transformation of the organisational model of local welfare through the establishment of stable multidisciplinary teams capable of addressing the growing complexity of social needs.

In recent years, it has become increasingly clear that organisational models based on the predominant focus on a single social profession are inadequate. Demographic changes, the rise in multidimensional poverty, the growing educational, psychological and relational needs, the spread of family vulnerability and the increasing interconnection between social and health issues now make it essential to adopt an approach based on the integration of professional skills. It is precisely in this light that the innovations introduced by Law No. 199 of 30 December 2025 must be understood.

For the first time, the national legislature has identified as an essential component of the LEPs Guarantee System not only the strengthening of the professional social work service, but also the establishment, within each Territorial Social Area, of multidisciplinary teams comprising social workers, psychologists and professional socio-pedagogical educators, whilst simultaneously setting out specific national standards for staffing levels and providing for a structural allocation of 200 million euros per annum from 2027 onwards to fund them.

This is a highly significant decision from a legal framework perspective.

For the first time, in fact, the legislator recognises that the effective realisation of social rights does not depend solely on the existence of benefits or economic resources, but also on the presence of an adequate and stable professional organisation capable of ensuring multidimensional assessments, personalised planning of interventions and continuity of care. The introduction of multidisciplinary teams is therefore one of the defining features of the reform of local welfare services. The integrated presence of social workers, psychologists and professional socio-pedagogical educators makes it possible to address, in a holistic manner, the various dimensions that characterise situations of vulnerability: economic, educational, relational, psychological, developmental and community-based.

This approach appears particularly relevant in the context of child poverty.

International literature highlights that the effects of poverty on children are not attributable solely to the availability of financial resources, but impact their cognitive, emotional, relational and social development, thus requiring integrated interventions that draw on a range of different expertise. Italy's decision to permanently integrate new educational and psychological professionals alongside the development of professional social work responds precisely to the need to ensure a truly multidimensional approach to care, in which economic interventions are accompanied by measures to support parenting, psychological support, educational guidance, the promotion of interpersonal skills and the strengthening of local networks.

This investment is not solely about the number of professionals involved.

In parallel with the introduction of the new multidisciplinary teams, the National Plan for Social Interventions and Services reaffirms the commitment to strengthening the professional social work service, aimed at achieving the minimum standard of one social worker per 5,000 inhabitants, with a service target of one social worker per 4,000 inhabitants, recognising the central role of social workers in taking charge of and coordinating local interventions.

At the same time, the Government has launched the first national recruitment competition aimed at recruiting new professionals into the public local welfare system, providing, for the first time, for the permanent inclusion of psychologists and professional socio-pedagogical educators within the Local Social Services Areas.

This initiative is accompanied by a significant investment in the development of professional skills.

In fact, starting from the 2025–2026 academic year, a national postgraduate university training programme, funded with EUR 50 million under the 2021–2027 National Inclusion Programme, aimed at delivering first- and second-level Master's degrees for social services practitioners, with the potential to train over 14,000 professionals. The aim is not merely to increase staff numbers, but to build a uniform professional system across the whole country, characterised by shared skills, common case management methodologies, the ability to work across disciplines, and a focus on the Essential Levels of Social Services.

In light of these factors, it is considered that the Memorandum correctly describes the need to strengthen the human capital of social services, but does not fully recognise the significant process of organisational reform initiated by the Italian legislature.

Recent regulatory changes do not, in fact, merely provide for new recruitment, but outline a new professional model for local welfare services, based on the stable integration of social, psychological and educational expertise, the establishment of national standards for staffing levels, the strengthening of specialist training, and the creation of permanent multidisciplinary teams.

This change is of strategic importance not only from an organisational perspective, but also as an essential condition for guaranteeing the effective implementation of the LEPs and for ensuring an integrated response to the complex needs of individuals and families. From this perspective, the strengthening of human capital is not a secondary measure, but rather a structural component of the broader reform of the Italian social protection system, aimed at giving effect to people's right to qualified, continuous and multidisciplinary care throughout the country.

The Memorandum draws attention to the need to ensure the continuity and financial sustainability of policies aimed at children and young people, highlighting the risk that some of these measures may be closely linked to temporary funding programmes, in particular those supported by European or extraordinary resources. It also emphasises the need to ensure an adequate level of public investment so that measures to combat child poverty can produce lasting and structural effects. The continuity of these measures is, in fact, an essential condition for guaranteeing the effective enjoyment of social rights and for preventing particularly complex inclusion pathways from being constrained by the duration of individual funding programmes.

However, it is worth noting that the reform process initiated by Italy was specifically aimed at moving beyond an approach based on a succession of project-based interventions, and instead at achieving the gradual consolidation of anti-poverty policies within the State's regular planning framework. The aim was not to increase the number of funded programmes, but rather to build a stable infrastructure for local welfare, in which the various sources of funding – both national and European – contribute to the realisation of a single strategic plan based on the implementation of the Essential Levels of Social Services. In this regard, please refer to what has already been said above regarding the LEPS Guarantee System. The main innovation of the reform lies precisely in linking the implementation of the essential levels to the establishment of a stable funding system, based on determining the levels of expenditure necessary to ensure their progressive delivery within each Territorial Social Area. In this way, the funding of social services is no longer determined solely by the availability of resources allocated to individual programmes, but is progressively integrated into a structural planning framework aimed at guaranteeing social rights.

With regard to initiatives funded through the National Inclusion Programme, including DesTEENazione and projects aimed at Roma, Sinti and Caminanti (RSC) minors, it should be emphasised that these are not conceived as isolated or experimental initiatives, but as tools to support the implementation of organisational models intended to be progressively integrated into the regular planning of the Territorial Social Areas. The use of European funds therefore follows a logic of transformative investment, aimed at fostering innovation in services, strengthening institutional capacities and building permanent local infrastructure, rather than simply

funding time-limited initiatives. From this perspective, the relationship between European and national funds should not be interpreted as an either/or situation, but rather as one of complementarity. European resources act as a catalyst for the reform process, whilst long-term sustainability depends on the gradual consolidation of these innovations within national legislation, routine planning and the LEPs Guarantee System.

Finally, it should be emphasised that the sustainability of social policies does not depend exclusively on the amount of resources available, but also on the system's ability to allocate them according to criteria consistent with the needs of local areas and with the objectives of reducing inequalities. In this regard, the new LEPs Guarantee Scheme introduces a particularly significant innovation, stipulating that the gradual adjustment of the criteria for the allocation of resources must take into account actual needs, the pool of beneficiaries and the objective of ensuring a more equitable territorial distribution of resources. This approach helps to strengthen not only the financial but also the institutional sustainability of the system, progressively directing public expenditure towards the guaranteed uniformity of social rights.

In light of these factors, it is considered that the Memorandum correctly identifies the need to ensure continuity in investment in the sector for children and young people, but does not fully recognise the process of structural consolidation of social policies currently underway in our country. The evolution of the Italian legal framework is, in fact, geared towards transforming programmes, funding and pilot schemes into permanent components of the local welfare system, through the integration of national funds, European resources, LEPs, the Guarantee Scheme and ordinary planning. From this perspective, sustainability is not merely a question of the availability of resources, but rather the result of a gradual institutionalisation of public policies, capable of ensuring stability, continuity and the effective enforceability of social rights over time.

“▪ Adequate monitoring mechanisms, involving all relevant actors, including civil society and persons affected by poverty and exclusion, as well as human rights bodies with the adequate mandate, resources and powers to secure the protection of children's rights.”

The Memorandum appropriately references the principle of the participation of children and adolescents in decision-making processes that affect them, citing the obligations arising from Article 12 of the United Nations Convention on the Rights of the Child and emphasising the importance of involving minors in the design, implementation, and evaluation of public policies intended to affect their living conditions. The Administration fully endorses this approach.

The participation of children and adolescents is now one of the fundamental principles guiding national social policy planning and is no longer considered solely as an individual right recognized by the UN Convention, but also as a defining element of public policies and an essential condition for improving their effectiveness, appropriateness, and ability to respond to the real needs of the younger generations.

In recent years, the Italian system has gradually moved beyond a predominantly “protective” conception of child-focused policies—in which children and adolescents were viewed primarily as recipients of interventions designed by adults—and has shifted toward a model that recognizes minors as active participants, possessing skills, experiences, and perspectives that are indispensable for shaping the policies that affect them. This evolution is fully consistent with the approach promoted by the UN Convention on the Rights of the Child and the Council of Europe's Strategy on the Rights of the Child, which identify participation as one of the fundamental tools for promoting autonomy, active citizenship, a sense of belonging to the community, and the full development of the individual. From this perspective, participation is not viewed as a merely consultative or symbolic exercise, but as a structural dimension of the pathways to social inclusion and growth for children and adolescents.

This approach is put into practice through numerous initiatives promoted by the Ministry of Labour and Social Policies.

In particular, the DesTEENazione programme views adolescent participation as a fundamental component of its intervention model. The multifunctional spaces provided for by the programme are designed not only as places to deliver services, but as educational and community settings where young people can actively contribute to shaping activities, experiment with forms of youth leadership, develop interpersonal skills, and participate in building local networks. From this perspective, participation serves as a tool for individual and collective empowerment and is itself a factor in preventing educational poverty and social exclusion. This same approach also characterizes parenting support initiatives, the personalised pathways provided under the Inclusion Allowance, and the projects developed under the Child Guarantee, in which the involvement of minors is progressively valued as an essential component of multidimensional care.

Also of particular significance is the recent Agreement signed between the Ministry of Labour and Social Policies and UNICEF, aimed at strengthening the implementation of the right of children and adolescents to be heard and involved in decision-making processes that affect them.

The agreement is part of the broader effort to implement the UN Convention on the Rights of the Child and the Child Guarantee and represents a major institutional investment aimed at promoting methodologies, tools, and practices capable of ensuring the effective participation of minors in public policy, with particular reference to social, educational, and local initiatives. Through this collaboration, the Ministry intends to promote the dissemination of participatory models that enable children and adolescents to contribute—in a manner appropriate to their age and level of maturity—to the design, implementation, and evaluation of initiatives that affect their quality of life, valuing their perspectives as an essential element for improving the quality of public policies. This is a particularly significant step, as it helps transform the right to participation from a general principle of the legal system into a standard component of national social planning.

This process is accompanied by the recent strengthening of the national regulatory framework. With Law No. 104 of July 4, 2024, the legislature has further reinforced the right of children and adolescents to be heard in proceedings and processes that concern them, introducing, among the measures to promote participation, the establishment of “Children’s Hearing Day,” an annual event designed to raise awareness among institutions and civil society regarding the right of minors to freely express their opinions and to be involved in decisions that affect their lives, in accordance with Article 12 of the United Nations Convention on the Rights of the Child. The establishment of Children’s Hearing Day has significance that goes beyond its symbolic nature. It represents the Italian legal system’s recognition that the right to be heard is a fundamental element of the protection of children’s and adolescents’ rights and helps promote an institutional culture based on the active participation of minors. This initiative complements the planning and organisational measures promoted by the Ministry of Labour and Social Policies, strengthening the overall coherence of the national strategy aimed at recognizing children and adolescents as rights-holders and key participants in their own journeys of growth, inclusion, and citizenship.

In light of these factors, it is believed that the Memorandum correctly highlights the central importance of the right of children and adolescents to be heard and involved in decision-making processes, but does not fully recognise the path our country has recently embarked upon to translate this principle into a structural component of social policies.

The integration of the principle of participation into the planning of the Child Guarantee, in national programmes targeting adolescents, in local care pathways, and in the recent Memorandum of Understanding with UNICEF Italy demonstrates, in fact, the commitment to consolidating a governance model for child-related policies in which children and adolescents are no longer considered merely recipients of protection, but active partners, rights-holders, and co-protagonists in shaping the public policies that affect them.

Conclusion

Italy reaffirms its commitment to continued engagement and cooperation with the Commissioner’s Office and, more broadly, with the Council of Europe’s Human Rights mechanisms and matters.