

Preventing Family Separation and Institutionalisation of Children

Recommendations for the 2028-2034 MFF Regulatory Framework

EU Collaborative supported by Tanya's Dream Fund

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"The EU budget is the Union's engine, which has time and again shown its transformative impact..."

COM (2025) 570 Final 16.7.2025 - The Multiannual Financial Framework 2028-2034, p1



Who are we?

We are a group of individuals and organisations with a pan-European perspective on social and environmental justice, equality, and civic engagement. Collectively, we bring decades of experience working to ensure EU funds deliver on their promises for the most marginalised communities, particularly children and families.

Our experience shows that EU funds have too often fallen short of delivering their intended 'transformative impact'. In many cases, they have not only failed to deliver meaningful change but they have actually caused harm.

Our collaboration is enabled by Tanya's Dream Fund (TDF), a time-limited, grant-giving initiative aimed at catalysing systems change in Bulgaria so that families and communities are supported to help children thrive. By scaling what works and creating effective partnerships, TDF supports initiatives at community, national and European level that contribute to lasting change.

Our shared ambition is that the design of the next EU funds is informed by TDF's learning and achievements, alongside the collective knowledge and experience of our organisations.

Our shared values

Evidence matters. Public policies and funding decisions must be grounded in robust data and proven evidence of what works

Collaborative ecosystems. Lasting progress requires collaboration across sectors, public, private and non-governmental, and professions and policy sectors

Inseparability of environmental and social justice. Environmental harm disproportionately affects marginalised communities and exacerbates inequality; solutions must be designed with fairness and inclusion at their core

Lived experience. The meaningful involvement of affected communities is essential to achieving sustainable and effective change

Intersectionality. Policies and solutions must recognise and address how the intersecting forms of inequality and discrimination shape people's lives and opportunities

Rights-based. International human rights standards must guide action and be upheld through transparent and independent oversight

Our shared purpose

We share a commitment to end the unnecessary separation of children from their families. We are resolute in our belief that families and communities living in adversity are partners in finding solutions, driving change and holding public authorities to account. We stand against any structural discrimination and racism and institutional maltreatment.

We aim to shift the narrative at EU level by proactively influencing the design and content of EU policies and funding, whilst also tracking and supporting the roll-out of existing EU policies and funds in Bulgaria. We come together to support and amplify the work of individual members, as well as to deliver collective action.

ERGO Network -- Eurochild -- European Roma Rights Centre -- CEE Bankwatch Network --
ATD Fourth World -- Bridge EU -- Make Mothers Matter -- Eurofam Network -- European
Expert Group -- Tanya's Dream Fund

Why this paper

The next EU Multiannual Financial Framework (2028-2034) will support the design and implementation of Member States' social policies and investments for the next decade.

Evidence from across Member States shows that families experiencing poverty and multiple forms of discrimination, based on ethnicity, race, disability or migration status, rarely interact with public authorities except in moments of stress. Institutional responses tend to be reactive and punitive rather than preventative and supportive. Children are separated from families because of poverty or discrimination rather than genuine protection needs.

By contrast, when systems are designed to provide timely, community-based support to families, outcomes improve for children and public expenditure decreases over time. EU funds play a decisive role in supporting structural changes and reforms in public policy and services.

This briefing sets out how EU funds can be designed to deliver better outcomes, stronger accountability, and long-term social and economic value, in line with the EU's legal obligations and strategic priorities.

We want to see EU funds that:

- **Incentivise prevention,**
- **Support integrated, community-based services,**
- **Respect fundamental rights,**
- **And embed accountability and participation.**

EU funds should encourage Member States to invest in strengthening families and communities. The EU's horizontal principles, solidarity, cohesion, human rights, partnership, transparency, 'do no significant harm' and 'leave no one behind', must be enforced consistently throughout the funding cycle.

Positive aspects of the Commission's regulatory proposal

We welcome several aspects of the Commission's regulatory proposal for the Fund that strengthen the EU's ability to invest effectively in inclusive social systems, including:

- A more coherent funding architecture aligning instruments such as ERDF, ESF+, CAP, and AMIF through National and Regional Partnership Plans (NRP Plans).
- Strong commitments to fundamental rights and the rule of law in the design and implementation of funds (Articles 7, 8, 9, 56(1)(c) and 56(2)(b) Fund Regulation).
- Clear objectives on social cohesion (Article 3(c)) and on fundamental rights, democracy and the rule of law (Article 3(e)), as well as objectives on strengthening the asylum systems and supporting the integration and social inclusion of third-country nationals.
- Provisions ensuring the participation of civil society, fundamental rights bodies, and social partners in the design, implementation and monitoring of EU funds (Article 6 Fund Regulation), including through monitoring committees (Article 55(1)).
- Requirements for monitoring committees to apply non-discriminatory, inclusive and transparent criteria, ensure accessibility and gender equality, and take account of the Charter (Article 56(2)).
- Simplification measures and increased flexibility that improve access to funds for smaller organisations and social economy actors, provided that adequate safeguards are maintained.
- Opportunities for cross-sectoral reforms through integrated funding streams, and the ability of the EU Facility to mobilise resources quickly in response to crises.

These elements can create the conditions for preventative, rights-based investments, provided they are applied consistently and supported by clear implementation requirements.

Key risks and gaps in the Commission's draft

We identify three overarching concerns in the current proposal:

- Insufficient and inconsistent support for civil society input and oversight;
- Inadequate mechanisms to ensure fundamental rights compliance;
- A weakening of the EU's leverage to drive social reforms.

A. Partnership Principle

While the EC proposal explicitly refers to involving representative civil society bodies in monitoring committees related to NRP Plans, it does not go far enough to ensure meaningful civil society participation in improving the quality of spending decisions and their oversight.

Specific concerns:

- Civil society representation remains vulnerable to political pressure. The Regulation should require balanced and independent representation, with formal review mechanisms when complaints about the monitoring committee composition are raised.
- The possibility for Member States to apply derogations from the partnership requirements in the areas of border management and internal security is deeply concerning. These policy areas require more transparency and accountability, not less.
- There is insufficient financial and organisational support for civil society to meaningfully contribute to the design and monitoring of EU funds.
- The Partnership Principle is confined to the monitoring of NRP Plans. It should be extended to the design phase of NRP plans and applied consistently across all EU Funds.

B. Fundamental rights compliance

Although fundamental rights obligations are referenced throughout the proposal, there is little clarity on how they should be interpreted or implemented.

Specific concerns:

- When identifying challenges under the NRP Plans, Member States are not required to explicitly name fundamental rights obligations. Their compliance with the Charter horizontal conditions relies on 'self-assessment', with no provision for independent verification.
- Complaints regarding the misuse of EU funds are expected to be reviewed by the Member States themselves, raising serious concerns about independence, impartiality and access to effective legal remedy. (Article 58(j))
- There is no detailed guidance on how to operationalise the funds in a manner compliant with fundamental rights, leaving room for continued misuse, for example, financing residential care institutions for children without addressing root causes of family separation.

C. Weakened EU leverage to drive social reforms

While the proposal repeatedly references objectives such as poverty reduction, particularly child poverty, the funding allocation is lower, and the accountability mechanisms are weaker, than in the current programming period.

The absorption of the European Social Fund (ESF) into the NRP Plans, combined with the removal of 'thematic enabling conditions' risks weakening the Funds' alignment with key EU social priorities including Roma inclusion, deinstitutionalisation, disability rights, and the European Child Guarantee.

Specific concerns:

- The proposed minimum 14% budget allocation for social objectives lacks ambition. At a minimum, funding should match the current level (25% of ESF+ for social inclusion), alongside specific earmarking for the European Child Guarantee.
- The Regulation provides no clarity on how funding will be distributed across objectives, or how they will support integrated investments in education, housing, employment, health, family support and social care.

Our key demands

To ensure EU funds deliver long-term social and economic value, we recommend the following.

1. Strengthen prevention and social inclusion	2. Ensure effective partnership and accountability	3. Operationalise fundamental rights
<p>Require NRP Plans to reflect EU policies on:</p> <ul style="list-style-type: none">• Charter of Fundamental Rights• Anti-racism• Roma inclusion• Poverty and child poverty reduction• Children's rights and integrated child protection• Deinstitutionalisation and social inclusion <p>Amend Article 10 (Budget) to:</p> <ul style="list-style-type: none">• Increase the minimum allocation for social inclusion• Earmark at least 5% for the European Child Guarantee (10% in higher child poverty MS)• Require detailed descriptions of how the 14% social allocation will be achieved• Provide technical assistance and capacity building to managing authorities for prevention investments.	<ul style="list-style-type: none">• Apply the partnership principle consistently across all funds, including border management and security.• Guarantee independent, representative and balanced civil society participation throughout the funding cycle.• Provide dedicated, long-term funding for civil society capacity building, participation and monitoring.• Provide capacity building and peer exchange opportunities for managing authorities.	<ul style="list-style-type: none">• Require NRP Plan challenges (Art. 22(2)(b)) to explicitly reference the Charter, infringement proceedings, case law, and international human rights recommendations.• Assign a central role to fundamental rights bodies in developing and monitoring the Charter horizontal condition self-assessment.• Establish independent complaints mechanisms for allegations of fund misuse or rights violations.• Support strategic litigation, including access to legal representation, for effective remedies.

Conclusion

The next Multiannual Financial Framework offers a strategic opportunity to ensure EU funds:

- **Support families before problems escalate,**
- **Deliver better outcomes for children,**
- **Reduce long-term public expenditure,**
- **And uphold the EU's legal and policy commitments.**

With clear governance, effective partnership, and operationalised safeguards for fundamental rights, EU funding can act as a catalyst for resilient, inclusive social systems across Europe.