

Comparative Analysis of Minimum Income Guaranteed Schemes within the Member States of the European Union

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Abstract: *The commitment of the European Union (EU) Member States towards accomplishing the commonly agreed goals (1997 European Employment Strategy, Lisbon 2000, and Europe 2020) is supported by a continuous assessment of domestic social policy tendencies. From this perspective, the main goal of the paper is to comparatively analyse the last safety net for the most vulnerable people. The screening of guaranteed minimum resources provides an overview of the applicable statutory basis, schemes in place, types of social benefits concerned, financing and organisation mechanisms, eligibility conditions, duration and time limits. As methodology, the article uses the MISSOC database, and due to the current lack of comparable information, recommendations for further harmonisation are included. 20 of the EU member states follow the minimum income guaranteed (MIG) regulations adopted already during the pre-accession period and updated after the accession phase. Seven types of domestic regulations are in force, among which the most frequent ones are acts and laws (ten countries). Common concepts used are social, and assistance. Provided allowances are mainly focused on elderly people, unemployment benefits, pensions, allowances supporting various house related costs, and benefits for disabled people. In line with 2007, 2010, and 2014 data, the financing of guaranteed minimum resources continues to remain mainly central with a shift in 2014 towards mixed financing (both central and local). The management in 2014 continues to be mainly centrally organised but the local stakeholders are also empowered. The residency is the most frequent eligibility condition. No nationality is required in 24 EU member states, for all allowances (21 countries) or for particular ones (three countries). 17 member states require no age conditions. Unlimited guaranteed minimum resources were provided in 2014 as long as the eligibility criteria were met in 23 EU member states.*

Keywords: *minimum income guarantee, guaranteed minimum resources, EU-28, social benefits*

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Introduction

The present paper is focused on screening the provision of the guaranteed minimum resources within the EU member states. Understanding social policy regulations nowadays at both EU and domestic level of each of the member states implies an assessment of the latest social protection network for the ones in need. The welfare state defined as “*gouvernants*” and “*gouvernes*” in the contractual tradition functions by its sovereign attributes (Boudon, Bourricaud, 1982, 236-237). It can also be interpreted as an essential correlation “between the idea of society and the idea of government, a certain conception of social harmony” (Compte, 1995, 114).

Social programmes for guaranteed income include: credit income tax, negative income tax, MIG, and earned income tax credit (Pop, 2002, 594). Other complementary concepts in understanding MIG schemes are guaranteed minimum resources, poverty, minimum wage, low paid work, subsistence minimum and minimum of decent life which takes into consideration elements of personal development and social affirmation (Briciu, 2002, 43-44; Arriba, Ibáñez, 2002, 16-18; Mihăilescu, 2004, 15; Ștefănescu, 2013, 117-118; Mihăilescu, 2014, 132-133; Mihăilescu, 2015a, 157; Mihăilescu, 2015b, 158).

MIG is subject of two complementary visions: as assistance supported by a universal substitute allowance and as a complementary preservation of obtained advantages in terms of allowances, pensions and guaranteed resources (Ferréol, 2000, 163). Provision of MIG supports social inclusion especially by its benefits promoting active inclusion on the labour market (Zamfir, 2002, 55-57; Ilie, Stănescu, 2004, 14; Stănescu, Dragotoiu, Marinoiu, 2012, 257-258; Stănescu *et al*, 2013, 14-16). Still, the low level of minimum income is a demotivating factor for labour insertion, people preferring to continue to access social assistance benefits through various guaranteed minimum resources rather than working for a low salary (Stanciu, Mihăilescu, 2011, 15).

As methodology, MISSOC data bases are used. Research outputs are presented in three categories: the EU founders², other old member states than the EU founders³, and Central and Eastern European (CEE) member states⁴. The research hypothesis on which this classification is based is that the accession to the EU shaped the design of the domestic social policy, and is owned by the largest post-doctoral programme to which this paper is part of.

Applicable statutory basis

This section of the article analyses the applicable statutory basis for MIG from three perspectives: the chronological development in relation to the moment of becoming an EU member state, types of regulations and subjects approached.

² France (FR), Germany (DE), Italy (IT), The Netherlands (NL), Belgium (BE), and Luxembourg (LU)

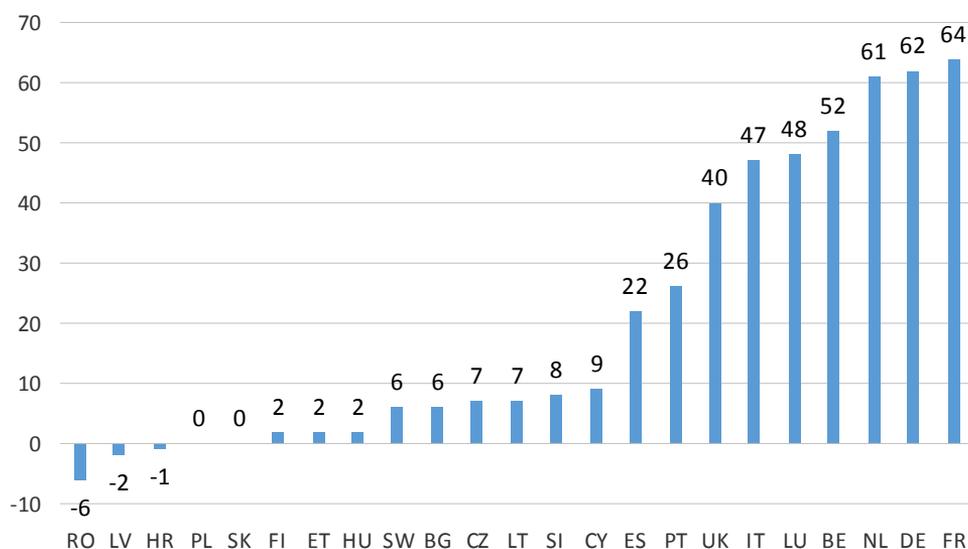
³ Denmark (DK), Ireland (IE), United Kingdom (UK), Greece (EE), Portugal (PT), Spain (ES), Austria (AT), Finland (FI), and Sweden (SW).

⁴ Cyprus (CY), Czech Republic (CZ), Estonia (ET), Hungary (HU), Latvia (LV), Lithuania (LT), Malta (MT), Poland (PL), Slovakia (SK), Slovenia (SI), Bulgaria (BG), Romania (RO), and Croatia (HR).

According to the MISSOC data base, 25 out of 28 member states updated or adopted MIG related regulations within the last decade of the 1990s (three countries), the first decade of 2000s (ten countries), and the second decade of 2000s (12 countries).

Three countries follow MIG related regulations adopted before becoming an EU member state, two countries changed these regulations in the year of EU accession, and 20 countries after the accession. In reference to the last category of countries, nine countries recorded MIG changes in less than ten years after joining EU, while four after more than 50 years.

Figure 1. Latest regulations of guaranteed minimum income by the moment of becoming an EU member state (years)



Source: MISSOC 1st of January 2014

As extreme values, RO regulated MIG six years before the EU accession, while FR continues to update regulations 64 years after becoming an EU member state. The purpose of this paper is not to analyse the reasons behind these legislative changes. Still, one recommendation in this respect is that the MISSOC data base should register differently domestic changes due to the provision conditions and to the updated amounts of MIG. The latter aspect is an element which does not essentially modify the general scheme of distributing the MIG.

Within the category of EU founders, IT and LU follow MIG related regulations that were adopted earlier on (1998 and 1999), while the latest related regulations were adopted by FR and MT in the year 2015.

Table 1. Recent regulations of minimum income guaranteed within founder members of the European Union

No.	Country	EU	Latest regulations
1.	France	1951	2015
2.	Germany	1951	2013
3.	Italy	1951	1998
4.	The Netherlands	1951	2012
5.	Belgium	1951	2003
6.	Luxembourg	1951	1999

Source: MISSOC 1st of January 2014

Looking at the category of EU member states “other old member states than the EU founders”, EE is the only country where MIG was not nationally provided in 2014. Two unsuccessful attempts (2000 and 2005) to set up MIG were followed by a pilot programme implemented in 13 municipalities (Liargovas, 2014, 6, 24-27).

It is expected that the MISSOC follow-up data in 2015 will bring relevant information in this respect. Nine different acts of the Landers are in force in AT and correlated information is not available in the MISSOC data base. As chronological development, FI preserves its regulations since 1997, while the latest are as of 2013 and were adopted in the UK. All seven countries (except AT, and EE) adopted MIG related regulations after becoming EU member states. On the one hand, the lowest values were registered by FI (two years after EU accession) and SW (six years), while the highest ones belong to UK (40 years), and DK (39 years).

Table 2. Recent regulations of minimum income guaranteed within other old member states except founder states of the European Union

No.	Country	Latest regulations	EU accession	Latest regulations
1.	Denmark		1973	2012
2.	Ireland		1973	2005
3.	United Kingdom		1973	2013
4.	Greece		1981	2012 ⁵
5.	Portugal		1986	2012
6.	Spain		1986	2008
7.	Austria ⁶		1995	
8.	Finland		1995	1997
9.	Sweden		1995	2001

Source: MISSOC 1st of January 2014

⁵ Law 4093/2013

⁶ No information available

All 13 CEE member states adopted MIG related regulations in the 2000s: six in the first decade, and seven in the second decade. Three countries adopted them before joining the EU: RO six years before, LV two years before and HR one year before. PL and SK adopted these regulations in the year of EU accession (2004). Latest regulations date from 2013 (CY and BG) and from 2015 (MT).

Table 3. Recent regulations of minimum income guaranteed within Central and Eastern Europe member states

No.	Country	Latest regulations	EU accession	Latest regulations
1.	Cyprus		2004	2013
2.	Czech Republic		2004	2011
3.	Estonia		2004	2006
4.	Hungary		2004	2006
5.	Latvia	2002	2004	
6.	Lithuania		2004	2011
7.	Malta		2004	2015 ⁷
8.	Poland		2004	2004
9.	Slovakia		2004	2004
10.	Slovenia		2004	2012
11.	Bulgaria		2007	2013
12.	Romania	2001	2007	
13.	Croatia	2012	2013	

Source: MISSOC 1st of January 2014

Seven types of MIG regulations are in force in 27 EU member states (except EE): act, law, decree, code, regulation, constitution, and emergency ordinance. The most frequent national regulations focused on MIG are acts (15 countries), followed by laws (ten countries), and decrees (six countries). These three types of regulations are present in all three categories of EU member states. In 12 EU member states the regulation of MIG is under one single domestic act (NL, AT, DK, FI, IE, SW, HR, and MT), law (LU, LV, and PL) or code (DE). In the other countries, regulations are constituted from different pieces of regulations but belonging to the same category: acts (UK, ET, and SI), laws (LT, and SK) or codes (FR). Currently enforced decrees are ordinary decree (PT, and BG), royal decree (BE, and ES), legislative decree (IT), or government decree (CZ).

⁷ <http://justiceservices.gov.mt/DownloadDocument.aspx?app=lom&itemid=8794>

Table 4. Types of MIG related regulations within the EU member states

Type of regulation	EU founders	Other old member states	Central and East European countries
Act	NL	AT, DK, FI, IE, ES, SW, UK	HR, CZ, ET, HU, ML, SI
Law	BE, LU	PT	BG, CY, LV, LT, PL, RO, SK
Decree	BE, IT	ES, PT	BG, CZ
Code	FR, DE		
Regulation			BG, HU
Constitution			CY
Decision			CY
Emergency ordinance			RO

Source: MISSOC 1st of January 2014

Within the category of other old member states than the EU founders, the most frequent MIG related regulation is represented by an act, while the law is the most frequent within CEE countries. Other forms of MIG domestic legislation in force are: codes (FR and DE), regulations (BG and HU), decisions (CY), and emergency ordinances (RO). The Cypriot Constitution mentions “the right to a decent standard of living and social security”.

Per category of domestic regulations focused on MIG, the most frequent subjects of the acts are social assistance (AT, FI, SI, and NL), social welfare (HR, ET, and IE) and social security (MT, ES, and UK). The law of social assistance concerns MIG in five post-communist countries (BG, LV, LT, PL, and RO).

As main topics included within the MIG domestic regulations, the most frequent concepts are social (23 countries), and assistance (ten countries).

“Social” is the most frequent concept present in MIG domestic regulations adopted by 23 EU member states: four EU founders (BE, FR, DE, and NL), seven other old member states (AT, DK, FI, IE, ES, SW, and UK), and 12 CEE countries (BG, HR, CY, ET, HU, LV, LT, MT, PL, RO, SK, and SI).

“Assistance” is used in ten EU member states within MIG related regulations mostly as part of “social assistance” (BG, FI, LV, PL, RO, SI, and NL), but also as “assistance in material need” (CZ, and SK) and public assistance (CY).

The concept “benefit” is identifiable in BE, ET, HU, ES, and UK. Next to it, allowance is mentioned in BE (disabled persons), and in BG (heating), and in UK (contribution).

Services are mentioned as social services (LV, and SW), social welfare services (CY), labour market services (ET), and employment services (SK). Work is mentioned as labour (FR), employment (SK), and work (NL). Pension is mentioned in BG, CY (social), and UK

(state pension credit). Need is a concept mentioned in the MIG related regulations from ES, as well as in the ones from CZ and SK where it is included in the expression “material need”. The concept of “right” appears with reference to social integration (BE) and to public funds (SI).

References to “social policy” include: social assistance (BG, FI, LV, PL, RO, SI, NL, and SI), social security (FR, MT, ES, and UK), social welfare (HR, ET, and IE), social protection (RO), active social policy (DK), social integration (BE), and social action (FR).

MIG is mentioned in BE (guarantee of income), BG, CZ (living and subsistence minimum), LT, RO, and SK (subsistence minimum).

Types of beneficiaries are mentioned as family (BE, and FR), elderly (BE, and BG) and persons residing abroad and returnees (ES).

References to social administration are made in HU, IT, SK and UK. Financial related subjects are identifiable within MIG related regulations as: indexation (CZ), financial social assistance (SI), fiscal balance (SI), and public funds (SI).

The basic principle in providing guaranteed minimum resources is to help people in need which are not able to support their daily expenses by personal effort so they could have a decent life standard. Higher amounts of MIG are provided for special categories of vulnerable people in: AT (in some regions for persons with disabilities, chronically ill persons), in CY (social welfare services depending on the income, number of dependent persons, special needs), CZ (depending on the applicant’s income, efforts and personal status), and in HR (single persons, people with general work incapacity, pregnant women and children from single-parent families). Benefits in kind and cash benefits are provided in HR, HU, IT, LV, and RO. The collection of comparable data for all EU member states would support further comprehensive analyses in this respect.

Overview of provided allowances

The following section of the paper gives an overview of the provision of MIG in the 27 EU member states except for EE from the viewpoint of the schemes in place, and the types of allowances supported by each member state, and the financing and organisation thereof.

Five frequent MIG related benefits were identified in the analysed 27 EU member states (except for EE): the ones focused on elderly, unemployment, pensions, allowances supporting various house related costs, and benefits for disabled people. Each of the first two is provided in eight member states while each of the last three is covered in seven countries. MIG forms of support for elderly are provided in eight countries (BE, FR, DE, HU, IT, LT, PT and ES). Unemployment allowances are provided in eight countries (ET, FR, DE, HU, IE, PT, ES and UK). Pensions are covered in the following EU member states (BG, HR, CY, IE, LT, ES and UK). House costs are supported in seven countries (CZ, ET, DE, LT, RO, SK and UK). Seven EU member states report disabled benefits under the MIG umbrella (BE, FR, IE, IT, LT, LU and PT).

None of the analysed countries reports all these five types of allowances under the MIG provision. Still, LT covers four of them (save for unemployment). Similar profiles were identified in FR and PT, and in IT and BE.

Table 5. Frequent focus of guaranteed minimum resources

	Elderly people	Unemployment benefits	Pensions	House related costs	Disabled people
ES	x	x	x		
DE	x	x ⁸		x	
FR	x	x ⁹			x
PT	x	x			x
HU	x	x			
LT	x		x	x	x
IT	x				x
BE	x				x
UK		x	x	x	
IE		x	x		x
ET		x		x	
BG			x		
HR			x		
CY			x		
RO				x	
SK				x	
CZ				x	
LU					x

Source: MISSOC 1st of January 2014

Two systems of guaranteed minimum resources are identifiable among the analysed 27 EU member states (except EE): a general system and a special one. In line with the MISSOC data base, three situations occur from the perspective of the systems provided within the EU member states:

- only the general system: HR, LV, and RO,
- only the special system: ES, and HU,
- both general and special systems: AT, BE, IE, PT, and BG.

⁸ Basic security benefits for

⁹ Temporary waiting period allowance if not entitled to unemployment benefits

As in the MISSOC data base only partial information is available for the other EU member states, we assume that they provide for guaranteed minimum resources in accordance with the general system. Further harmonisation of collected domestic data would be more than useful in this respect.

In line with the 2014 MISSOC database, BE reports a general system and a special system (MIG for elderly, disabled persons' allowance, and guaranteed family benefits). In BG the general non-contributory minimum is provided alongside the specific non-contributory minimum (for elderly – social pension for old-age). MIG related benefits in CY are constituted from social welfare services (public assistance, social insurance services, and social pension) and the grants and benefits service (scheme for supporting pensioners' households). The system of assistance in material need in CZ is composed by: allowance for living, supplement for housing, and extraordinary immediate assistance. DK reports the social assistance and educational assistance. In ET the subsistence benefit is regulated together with the needs-based family benefit and unemployment allowance. A fixed amount and additional ones depending on needs are regulated in FI. Various forms of MIG related supports are available in FR: active solidarity income, allowance for disabled adults, solidarity allowance for the elderly, supplementary invalidity allowance, allowance of specific solidarity, temporary waiting period allowance, and retirement-equivalent benefit (replaced since 1 July 2011 by the transitional solidarity allowance). DE regulates three forms of support: the assistance towards living expenses, the needs-based pension supplement in old age and in the event of reduced earning capacity, and basic security benefits for jobseekers. In the case of HU, no general non-contributory minimum is set up but specific non-contributory minima are in place: benefit for persons in active age (including two types of benefits: regular social allowance and employment substituting benefit) and old-age allowance.

Guaranteed minimum resources in IE imply a general non-contributory minimum and a specific non-contributory minimum: jobseeker's allowance, disability allowance, blind pension, one parent family payment, farm assist, widow's, widower's or surviving civil partner's and state pension, and carer's allowance.

In IT, the regions (but in some cases municipalities and local entities) have legislative functions and administrative competences in the field of social services for disabled persons (minors, youngsters, elderly people, poor families etc.).

A general non-contributory minimum and a guaranteed minimum income benefit are in force in LV. With reference to LT, two main non-contributory schemes for guaranteed minimum resources are regulated: a cash social assistance one (social benefit and reimbursement for the cost of house heating, hot water and drinking water) as well as a social assistance pension.

MIG in LU are covered as a guaranteed minimum income (which consists of either an integration allowance or a supplementary allowance) and a specific guaranteed minimum income for seriously disabled persons.

In MT, a subjective right to a differential means-testing benefit is provided by central government for risks of sickness or unemployment.

Various benefits are provided in PT: general system (social integration income) & specific non-contributory minima (invalidity and old-age social pension, widow(er)'s pension and orphan's pension, solidarity supplement for the elderly, social allowances in the framework of maternity, paternity and adoption protection and unemployment allowance).

The provision of MIG in RO covers a social aid, heating energy allowance, natural gas allowance and solid fuel or oil allowance.

Under the assistance in material need the following benefits are covered in SK: protecting allowance, activation allowance, housing benefit and allowance for a dependent child. In addition, a one-off benefit can be provided to cover extra expenses.

SI provided the financial social assistance (ordinary and emergency financial social assistance¹⁰) and supplementary allowance.

No general non-contributory minimum is regulated in ES. Still, specific non-contributory minima are covered under the form of: non-contributory old-age pension, non-contributory invalidity pension, unemployment assistance, minimum for Spanish persons residing abroad and returnees.

National norms have been regulated in NL. Additional special assistance can be provided by local municipalities.

The following benefits are set up in the UK: income support, jobseekers' allowance, pension credit, employment and support allowance, and housing benefit.

Financing and organisation

Financial support of MIG related benefits is organised at central level, the local one or in a mixed form of the aforementioned. Most EU member states prefer a central organisation but mixed provision is a current trend. In line with the MISSOC data¹¹ for 2007, 2010, and 2014, ten countries preserve their centralised financing: one EU founder (FR), three other old member states (IE, PT, and UK), and six CEE countries (BG, CY, CZ, ET, MT, and SK).

Table 6. Financing of minimum income guarantee schemes

	EU founders			Other old member states			Central and East European countries		
	2007	2010	2014	2007	2010	2014	2007	2010	2014
Central	BE, FR, LU, NL	FR	FR	DK, FI, IE, PT, UK	IE, PT, UK	IE, PT, UK	BG, CY, CZ, ET, LV, LT, MT, PL, SI	BG, CY, CZ, ET, HU, LT, MT, SK, SI	BG, CY, CZ, ET, MT, SK, RO

¹⁰ Special Emergency Financial Social Assistance after the Death of a Family Member and Special Emergency Financial Social Assistance for Covering Funeral Expenses

¹¹ Not applicable in EE. No information available for ES, and HU (2007), and IT (2010).

	EU founders			Other old member states			Central and East European countries		
	2007	2010	2014	2007	2010	2014	2007	2010	2014
Local	DE, IT		DE, IT	AT	AT, DK, FI	AT, DK, FI, ES SW	RO	LV, RO	LV, SI
Mixed		BE, DE, LU, NL	BE, LU, NL	SW	ES, SW		SK	PL	HR, HU, LT, PL

Source: Crepaldi (ed.), 2011, p. 23 (for 2007, and 2010), MISSOC 1st of January 2014

Two EU founders (DE, and IT) kept their local distribution of MIG while LU and NL have a mixed organisation at least as of 2010. In AT the distribution is constantly organised at the local level. DK, and FI followed at least as of 2010, and ES and SW at least since 2014.

Among CEE countries, RO is the only one which had the experience of local financing and now central support is provided, but administrative costs are partially supported by the local budgets.

Collection of the yearly data for the period 2008-2013 could give a clearer picture of the exact year when central, local or mixed financing schemes were set up. For example, a further check of the 2010 data for DE would reveal the nature of mixed regulations that were adopted since 2007, and the 2014 data shows a local focused financing. The 2007 data for SK could also provide useful information if either a central organisation was in place or a similar local organisation was experienced with.

Distribution of guaranteed minimum resources in 2014 was organised and attributed to the central level (19 EU member states), at federal level (two EU member states), at regional level (four EU member states). Decentralisation of MIG schemes in ES, and IT supported innovative policies (Natili, 2014, 30).

Municipalities were involved in ten countries. Local public administration is involved in 10 EU member states. In BG the community also plays a role. 105 municipal agencies are involved in DE. Stakeholders involved in PL include foundations, associations, churches, trade unions, employers, and natural and legal persons.

Table 7. Organisation and management of guaranteed minimum resources

	Central	Federal	Regional	Municipality	Local	Community
AT			x	x		
BE		x	x		x	x
BG	x					
HR	x			x		
CY	x					
CZ	x					
DK				x		
ET	x				x	

	Central	Federal	Regional	Municipality	Local	Community
FI				x		
FR	x					
DE		x		x	x	
EE						
HU	x				x	
IE	x					
IT			x	x	x	
LV	x			x	x	
LT				x		
LU	x			x		
MT	x					
PL	x				x	
PT	x					
RO	x					
SK	x					
SI					x	
ES	x		x			
SW	x				x	
NL	x				x	
UK	x			x		

Source: MISSOC 1st of January 2014

Discretionary entitlement to guaranteed minimum resources is regulated in BG (monthly social assistance allowance, social pension for old-age), DK, PL, and SI (extraordinary Financial Social Assistance). Non-discretionary entitlement is regulated in DE, LU (guaranteed minimum income, specific guaranteed minimum income for disabled persons), SK, and ES. We recommend that the MISSOC data base collect information relative to (non)discretionary entitlement for all EU member states currently lacking in information.

Eligibility conditions: nationality, residence, and age

Eligibility criteria for MIG refer to nationality, residence, age and means-related conditions¹², and requirements for job search, vocational training and behaviour modification. Other conditions are regulated in 12 out of the analysed 27 EU member states: two EU founders (DE, and IT), three other old member states (PT, SI, and ES), and seven CEE countries (BG, CY, ET, HU, LT, MT, and PL). This section of the article analyses conditions related to the nationality, residence and age.

¹² Rights in rem (real property), personal property (movable assets), income and (other) benefits, exhaustion of other claims, and exemption of resources.

Table 8. Eligibility criteria for receiving the minimum income guarantee

Forms of support	EU founders	Other old member states	Central and East European countries
Nationality	BE, DE	AT, ES	HR, CY, MT
Residence	BE, FR, DE, IT, LU, NL	DK, FI, IE, PT, ES, UK	BG, HR, CY, CZ, ET, HU, LV, LT, MT, PL, RO, SK, SI
Age	BE, FR, DE ¹³ , LU, NL	DK, IE ¹⁴ , PT ¹⁵ , ES, UK	BG ¹⁶ , CY ¹⁷ , ET ¹⁸ , HU, LT, MT, PL, RO, SI ¹⁹

Source: MISSOC 1st of January 2014

No nationality requirements are in force in 24 EU member states: all six EU founders (BE, FR²⁰, DE, IT, LU, and NL), seven other old member states (DK, ES, FI, IE, PT, SW, and UK), and eleven CEE countries (BG, CY, CZ, ET, HU, LV, LT, PL, RO, SK, and SI). 21 EU member states²¹ apply no-nationality condition to all MIG related benefits. Three countries apply it only to particular benefits: BE (guaranteed family benefits), DE (Basic security benefits for jobseekers), and ES (Non-contributory old-age pension, non-contributory invalidity pension, unemployment assistance).

No-nationality as eligibility condition is frequently correlated with residence condition²². In HR and MT the guaranteed minimum resources are provided to nationals but foreign nationals with legal residence are also entitled.

Nationality is required in five EU member states with reference to all minimum guaranteed resources (HR, and MT) or focused on particular social benefits: in BE (general system, MIG for elderly, disabled persons' allowance), DE (assistance towards living expenses), and ES (Minimum for Spanish persons residing abroad and returnees). In conclusion, these EU member states (BE, DE, and ES) provide a mix of nationality based and no-nationality allowances.

Other categories of people entitled to guaranteed minimum resources include:

- Refugees AT, BE (general system, MIG for elderly, disabled persons' allowance), DE (assistance towards living expenses),

¹³ In DE: Basic security benefits for jobseekers

¹⁴ In IE: jobseeker's allowance, blind pension, one parent family payment, farm assist and widow's, widower's or surviving civil partner's (non-contributory) pension, and disability allowance. State Pension (Non-Contributory): from age 66.

¹⁵ In PT: Social integration income, invalidity social pension, old-age social pension, orphan's pension, solidarity and supplement for the elderly

¹⁶ In BG: specific non-contributory minima: social pension for old-age.

¹⁷ In CY: social insurance scheme: social pensions.

¹⁸ In ET: unemployment allowance

¹⁹ In SI: supplementary allowance

²⁰ Beneficiaries for temporary waiting period allowance are regulated as asylum seekers, foreigners granted temporary or subsidiary protection, stateless persons, persons returning from abroad and awaiting reintegration.

²¹ BG, CY, CZ, DK, ET, FI, FR, HU, IE, IT, LV, LT, LU, PL, PT, RO, SK, SI, SW, NL, and UK.

²² AT, BE, HR, CY (social welfare services), FR, and MT.

- Stateless persons authorised to reside: BE (general system, MIG for elderly, disabled persons' allowance), FR (temporary waiting period allowance),
- Foreigners in AT (assimilated on the grounds of EU directives), BE (listed on the national register of natural persons), HR (with resident permits), FR (temporary waiting period allowance),
- Asylum seekers in FR (temporary waiting period allowance), DE²³,
- People returning from abroad to FR (temporary waiting period allowance),
- EU citizens BE (general²⁴, disabled persons' allowance), DE (citizens of the signatory countries to social security agreements e.g. most of the EU member states),
- Categories of persons covered by the Regulation (EC) 883/2004 BE (MIG for elderly, disabled persons' allowance²⁵).

Residence is typically not required in AT while SI accepts temporary residence. In SW persons legally entitled to stay are covered but no permanent residence is required. Categories excepted from the residency conditions are regulated in BE, and in CZ. Temporary residency is considered in HR (exceptionally), and SI. An extraordinary immediate assistance is provided in CZ for persons in serious danger staying (i)legally.

Residency represents an eligible condition in receiving guaranteed minimum resources in all EU founders, seven other old EU member states (except for EE, and taking into account the case in AT), and all CEE countries. Various ways to refer to residency include:

- Permanent residence in ten countries: BE (general system, also for MIG for elderly & MIG for disabled persons²⁶), HR, CZ, FI, FR (stable and effective), LV, LT, MT, PL, and SI,
- Legal residence in nine countries: BG (authorised by the Ministry of Interior), CY (social welfare services, social insurance services, grant and benefits service), DK, ET, LU, PT, ES (non-contributory old-age pension²⁷, non-contributory invalidity pension²⁸, unemployment assistance, minimum for Spanish persons residing abroad²⁹ and returnees³⁰), SW, and NL,
- Long-term residence in three countries: BG (indefinite period), CZ, HU (benefit for persons in active age, old-age allowance),
- Residence in three countries: IT, RO (or domicile), SK (or stay) alongside,
- Habitual residence in three countries: DE (basic security benefit for jobseekers), IE, and UK,

²³ A special benefit system applies according to the Asylum Seeker Benefits Act

²⁴ Or members of their family accompanying or joining them with the right of residence of more than three months

²⁵ Nationals of Iceland, Liechtenstein, Norway, Switzerland, Morocco, Algeria or Tunisia and who fulfil the conditions of Regulation (EC) 883/2004;

²⁶ Stay abroad of a disabled beneficiary is accepted under certain exceptions

²⁷ Have been so for at least 10 years between the age of 16 and 65 (two of which immediately prior to the date of pension application)

²⁸ Have been so for at least 5 years (two of which immediately prior to the date of pension application)

²⁹ Spanish persons residing abroad: legally resident in countries where the social protection systems are unsettled

³⁰ Spanish persons, born in ES, who have resided in countries where the social protection systems are unsettled and persons of Spanish origin who have resided in ES for 8 years before the claim and held Spanish nationality during this period.

- Actual residence in DE (assistance towards living expenses, needs-based pension supplement in old age and in the event of reduced earning capacity).

The obligation to be present in the country is mentioned in UK and two years of stay before the claim entitle the applicant for the residence test. Other periods of residence include three months (CZ³¹, HU), at least four years BE (MIG for families), at least five years during the last 20 years in LU³².

17 EU member states require no age condition when claiming minimum guaranteed resources. It is the case of three EU founders (BE, FR, and DE), five other old member states than EU founders (AT, FI, IE, PT, and SW), and nine CEE member states (BG, HR, CY CZ, ET, LV, LT, SK, and SI). Still, two categories can be identified. Within the first one, all MIG related benefits are concerned. This applies to six countries: AT, HR, CZ, LV, SK, and SW. For the second category these conditions only apply to particular types of MIG related benefits. It concerns the following 11 countries: BE (guaranteed family benefits), BG (general non-contributory minimum), CY (grants and benefits service), ET (subsistence benefit, needs-based family benefit), FI (social assistance³³), FR (allowance of specific solidarity, temporary waiting period allowance³⁴), DE (assistance towards living expenses, needs-based pension supplement in old age and in the event of reduced earning capacity³⁵), IE (supplementary welfare allowance), LT (social assistance pension in the case of disabled), PT (widow(er)'s pension, social allowances in the framework of maternity, paternity and adoption protection, unemployment allowance), and SI (financial social assistance, supplementary allowance for permanent incapacity for work or permanent non-employability).

Eight EU member states offer both age related benefits and non-age related ones: two EU founders (FR, and DE), two other old member states than the EU founders (IE, and PT) and four CEE countries (BG, CY, ET, and SI).

The minimum eligible age for guaranteed minimum resources varies as follows:

- 15 years (DE for basic security benefits for jobseekers),
- 16 years in ET (unemployment allowance), RO (heating allowance), ES (unemployment assistance), IE (disability allowance),
- under 18 years in PT (social integration income³⁶, invalidity social pension, orphan's pension),
- 18 years in MT, NL, PL, BE (general system³⁷), HU (benefit for persons in active age), IE (jobseeker's allowance, blind pension, one parent family payment, farm assist and

³¹ For EU citizens who are not under Regulation 492/2011

³² Except for nationals of an EU/EEA Member State, Swiss nationals, refugees and stateless persons

³³ It is seldom given individually to children under 18 years as parents are obliged to support their children

³⁴ The person should not fulfil the conditions for drawing a full pension.

³⁵ Minors can claim in their own right. From the age of 65 and in case of permanent full earning incapacity from the age of 18, the needs-based pension supplement in old age and in the event of reduced earning capacity is granted instead of the assistance towards living expenses.

³⁶ If the person has the sole responsibility for maintaining minor or disabled children, is married or lives in a de facto union for more than two years, or if it concerns a pregnant woman.

³⁷ Three exceptions: minors emancipated by marriage, single persons looking after (a) child(ren), pregnant minors

widow's, widower's or surviving civil partner's non-contributory pension), ES (social integration income, non-contributory invalidity pension), RO (social aid), and UK (income support, jobseekers' allowance (income-based), employment and support allowance (income-based) and housing benefit),

- 20 years in FR (allowance for disabled adults³⁸),
- 21 years in BE (disabled persons' allowances: income replacement allowance, integration allowance³⁹),
- 25 years in FR (active solidarity income⁴⁰), LU⁴¹,
- 30 years in DK (social assistance),
- 65 years in BE (guarantee of income for elderly persons, allowance for assistance to the elderly), CY (social insurance services), ES (non-contributory old-age pension),
- 66 years in IE (state pension – non-contributory), ES (old-age social pension, solidarity supplement for the elderly),
- 70 years in BG (social pension for old-age).

The maximum age to receive MIG is the standard retirement age in DE (basic security benefits for jobseekers), ET (unemployment allowance⁴²), ES (unemployment assistance), FR (allowance for disabled adults, solidarity allowance for the elderly), HU (benefit for persons in active age, old-age allowance), LT (Social assistance pensions), and SI (Supplementary Allowance). Other regulations for maximum age refer to:

- 60 years in MT,
- 64 years in BE (disabled persons' allowances: income replacement allowance, integration allowance),
- 65 years in ES (non-contributory invalidity pension),
- 66 years in IE (disability allowance, jobseeker's allowance, blind pension, one parent family payment, farm assist and widow's, widower's or surviving civil partner's non-contributory pension).

No maximum age limit is applicable in BE (general system). Age regulations in IT vary according to the regions and municipalities. The pension credit entitlement age in UK is linked to the state pension age for women.

Fixed age periods are regulated in DK and ES: 16 to 65 years (for minimum for Spanish persons residing abroad), 18 to 29 years in DK (social assistance⁴³, educational assistance), 45-65 years in ES (active integration income), and over 65 years for minimum for Spanish returnees).

³⁸ Up to the eligible age for solidarity allowance for the elderly (supplementary invalidity allowance)

³⁹ A person receiving income replacement allowance and/or integration allowance before age 65 continues to receive these benefits beyond that age. These cannot be combined with the allowance for elderly assistance.

⁴⁰ Or under 25 if they have to support at least one child, even if not yet born; or if they can prove a minimum period of activity and not having reached the age required for entitlement to old-age pension

⁴¹ Derogations for persons who are incapable of work, raising a child or taking care of a disabled person

⁴² Except persons on pre-retirement pension

⁴³ In the case of having completed an education qualifying for an occupation

Duration and time limits

Unlimited guaranteed minimum resources are provided as long as the eligibility conditions are fulfilled in 23 EU member states. Two categories of countries are identified: either this condition is in place regardless of the form of social benefits (AT, BG, HR, CZ, DK, HU, FI, IE, SK, ES, SW, LU, MT, PL, NL, and UK.) or it applies for specific benefits.

Table 9. Duration of minimum income guarantee's provision

	EU founders			Other old member states			Central and East European countries		
	2007	2010	2014	2007	2010	2014	2007	2010	2014
Unlimited	BE, DE, LU, NL	BE, DE, LU, NL	BE, FR ⁴⁴ , DE ⁴⁵ , LU, NL	AT, DK, FI, IE, SW, UK	AT, DK, FI, IE, SW, UK	AT, DK, FI, IE, PT ⁴⁶ , ES, SW	BG, CY, CZ, ET, MT, PL, RO	CY, CZ, ET, MT, SK	BG, HR*, CY, CZ, ET* ⁴⁷ , HU, LT ⁴⁸ , MT, PL, SK
Limited, extendible			FR ⁴⁹ , DE ⁵⁰	PT, ES	PT	PT ⁵¹	LT, SK, SI	BG, LV, LT, PL, RO	LT ⁵² , RO ⁵³
Limited, extendible with restrictions		FR				PT ⁵⁴	LT	SI	SI
Limited			FR ⁵⁵			PT ⁵⁶			ET ⁵⁷ , LT ⁵⁸ , RO ⁵⁹

Source: Crepaldi (ed.), 2011, p. 23 (for 2007, and 2010), MISSOC 1st of January 2014

Note: *renewable

⁴⁴ Solidarity allowance for elderly, supplementary invalidity allowance

⁴⁵ Assistance towards living expenses, basic security benefit for jobseekers

⁴⁶ Invalidity social pension, old-age social pension, widow(er)'s pension, orphan's pension, solidarity supplement for the elderly

⁴⁷ Subsistence benefit, needs-based family benefit

⁴⁸ Social assistance pension

⁴⁹ Allowances: for disabled adults, of specific solidarity, temporary waiting period, transitional solidarity

⁵⁰ Needs-based pension supplement in old age and in the event of reduced earning capacity

⁵¹ Social integration income

⁵² Social Benefit

⁵³ MIG

⁵⁴ Unemployment allowance

⁵⁵ Active solidarity income for three months

⁵⁶ Social allowances in the framework of maternity, paternity and adoption protection

⁵⁷ Unemployment allowance for 270 days

⁵⁸ Reimbursement for cost of house heating, hot water and drinking water, social benefit and reimbursement for the cost of house heating, hot water and drinking water

⁵⁹ Heating allowance

Applications for MIG benefits should be renewed in three cases: either after the expiration of fixed but extendable period of provisions, when continuous accomplishment of eligibility criteria is to be preferred or when a situation emerges meaning that the eligibility criteria change so that the MIG beneficiary is not entitled anymore to a certain type of MIG. This situation doesn't exclude that he/she could receive other MIG related benefits. These three situations are inter-correlated and in some EU member states are regulated separately. While the first one is subjective and optional, if the applicant decides to apply, the second and the third one are usually regulated on a fixed mandatory period of time and when a certain situation appears.

The most common periods to renew the application are:

- monthly ET (subsistence benefit), FR (temporary waiting period allowance but a maximum of 12 months),
- less than three months LT (cash social assistance),
- three months ET (needs-based family benefit), FR (active solidarity income), LV (the guaranteed minimum income up to six months), LT (social benefit, reimbursement for house-related costs), SI (financial social assistance, supplementary allowance – but extended for six months),
- 6 months FR (active specific solidarity), DE (renewable basic security for jobseekers),
- 12 months / yearly BE, DE (needs-based pension supplement in old age and in the event of reduced earning capacity), FR (allowance for disabled adult and up to 5 or 10 if the disability cannot improve), and PT (social integration income – renewable).

Conclusions

With respect to the chronological development of applicatory statutory basis in each member state for guaranteed minimum resources, the latest updates are registered since the second decade of the 2000s (13 countries), the first decade of the 2000s (ten countries), and the 1990s (three countries). From the perspective of becoming a EU member state, three countries followed pre-accession regulations (RO, LV, and HU), two countries changed their regulations in the year of accession (PL, and SK), and 21 have post-accession regulations. Among seven types of domestic regulations in force, the most frequent are acts (15 countries) and laws (ten countries). Common concepts used are social (23 countries), and assistance (10 countries).

Provided allowances are mainly focused on elderly people, unemployment benefits, pensions, allowances supporting various house related costs, and benefits for disabled people. Alongside other social benefits, they are organised within a general system (HR, LV, and RO), a special one (ES, and HU), or a mixed one (AT, BE, IE, PT, and BG). Further collection of harmonised information would support the finalisation of on-going research.

In line with 2007, 2010, and 2014 data, the financing of the guaranteed minimum resources continues to remain mainly central with a shift in 2014 towards mixed financing systems (both central and local). The management in 2014 continues to be mainly centrally organised but the local stakeholders are also empowered.

The residency is the most frequent eligibility condition to receive guaranteed minimum resources. No nationality is required in 24 EU member states either for all allowances (21 countries) or for particular ones (three countries). 17 member states require no age conditions. Unlimited guaranteed minimum resources were provided in 2014 as long as the eligibility criteria were met in 23 EU member states.

The common goals of promoting a decent life standard and the free movement of workers especially but not exclusively for EU citizens within member states involve a continuous assessment of social security arrangements. In this respect, the paper contributes by screening the last safety nets represented by guaranteed minimum resources towards further harmonisation.

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