

CONTRIBUTION

European Affordable Housing Plan Should Address the Most Deprived and Excluded Situations, affecting Vulnerable Groups such as Roma

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The European Network on Roma Equality under EU Funds (EURoma Network) has been working since 2007 to foster an increased and effective use of European Cohesion Policy Funds (notably ESF/ESF+ and ERDF) to advance the social inclusion, equal opportunities and fight against discrimination of Roma people across the EU, through mutual learning, generation of knowledge and awareness-raising activities. To this end, the Network brings together public authorities responsible for Roma policies (i.e. National Roma Contact Points) and those in charge of European Cohesion Policy Funds from 15 EU Member States, as well as the European Commission. The Fundación Secretariado Gitano (FSG), which is responsible for the Network's Technical Secretariat, leads and coordinates the Network. For further information: www.euromanet.eu

This document presents the EURoma Network's input to the European Commission's public consultation regarding the forthcoming European Affordable Housing Plan, scheduled for the first half of 2026. It seeks to ensure that the new Plan duly acknowledges and effectively addresses the most severe forms of housing exclusion and deprivation – including substandard and segregated housing conditions, such as settlements - where many Roma and other vulnerable populations, including large numbers of children, continue to live.

1. Introduction

The EURoma Network welcomes the European Commission's intention to present the first-ever European Affordable Housing Plan in order to provide a European approach and add value to Member States' efforts to address the current housing crisis, guaranteeing affordable, sustainable and decent housing for all European citizens.

Indeed, it is urgent to address the current housing crisis (linked to the access to decent, affordable and quality housing), which affects a large share of the European population, including low- and middle-income households. However, as the European Commission has stated, **vulnerable people suffer disproportionately from the increasingly widespread housing affordability crisis**, especially if they cannot access social housing. Furthermore, **certain vulnerable groups, such as Roma, face additional challenges in accessing affordable and decent housing** due to discrimination and a higher risk of poverty, social exclusion and energy poverty compared to the general population. As a result, the challenges they face linked to the current housing crisis must be considered alongside the longstanding structural issues that have remained unresolved over time.

Particular attention needs to be paid to the most deprived and excluded housing conditions that still exist in the EU today, including substandard and segregated housing, such as settlements¹, and which are mainly the home to vulnerable groups such as the Roma, including a large number of children. Not only do these people live in inadequate conditions (in precarious housing without basic amenities such as running water and electricity, in areas without public services, and often in unhealthy environments exposed to pollution and toxins), but they are also often separated from the rest of the population. This undermines their access to other essential fundamental rights, including education, employment, and healthcare, and makes it difficult for them to live a dignified life and break free from poverty and exclusion.

Against this background, **EURoma calls on the future Affordable Housing Plan to not only explicitly acknowledge and pay particular attention to the specific housing situation of the most vulnerable groups such as Roma, but to also address the situations of extreme housing vulnerability and exclusion, such as settlements, which particularly affect these groups.** Such deprived and excluded housing situations in the heart of the EU cannot remain invisible in a future EU housing policy framework. The first-ever EU housing plan should be a crucial instrument to contribute, in synergy with the other sectoral policies, to building a more inclusive and equitable society that guarantees that all individuals, including vulnerable groups such as Roma, can fully enjoy their fundamental rights, including access to adequate, decent and affordable housing, along with education, employment and healthcare.

The Plan would offer an ideal framework to contribute, through a comprehensive strategy, to **giving a greater push to the current Roma-specific policy framework** -the EU Roma Strategic Framework for equality, inclusion and participation for 2020-2030²- which, despite including as one of its objectives *'Increasing effective and equitable access to adequate, non-segregated housing and essential services for the European Roma population'* has not resulted into tangible changes in this complex area. Also, to **answer to the calls for action made over the past years by the European Parliament and the European Council.** In its 2022 Resolution about the situation of Roma people living in settlements in the EU³, the European Parliament called on the Commission to step up its efforts to gradually eradicate marginalised Roma settlements across the EU by launching an EU action plan to eradicate Roma settlements by 2030. The European Council Conclusions on measures to ensure equal access for Roma to adequate and non-segregated housing and addressing segregated settlements (2023)⁴, also called on the European Commission and Member States to ensure equal access for Roma to adequate and desegregated housing, and to address segregated settlements.

EURoma Network presents its proposals outlining key elements that should be integrated into the forthcoming EU Affordable Housing Plan to ensure an effective response to the persistent situations of extreme vulnerability and exclusion that continue to exist across the EU, including substandard and segregated conditions, such as settlements, which disproportionately affect vulnerable groups such as Roma. The upcoming Housing Plan should serve as a strategic instrument to foster synergies with the EU Roma Strategic Framework, thereby strengthening efforts to address these entrenched challenges.

¹ For the purpose of this document, the definition of 'segregated settlements' agreed in the 2023 'European Council Conclusions on measures to ensure equal access for Roma to adequate and non-segregated housing and addressing segregated settlements' is used, i.e. slums and substandard housing settlements of an informal and stable nature, with physical, functional and/or social isolation, where the objective conditions related to housing, poverty and access to rights and public services are significantly worse as compared to the rest of the population, which should contribute to a common understanding and framework of the situation.

² <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52020DC0620&qid=1759123089061>

³ https://www.europarl.europa.eu/doceo/document/TA-9-2022-0343_EN.html

⁴ <https://data.consilium.europa.eu/doc/document/ST-13517-2023-INIT/en/pdf>

EURoma's contribution places particular emphasis on the critical role of EU Funds - specifically the European Social Fund Plus (ESF+) and the European Regional Development Fund (ERDF)- in achieving the objectives of the future Plan. The proposals are grounded in the collective expertise of the Network's partners, drawing from their experience in managing both Roma inclusion policies and ESF+/ERDF funds.

2. Why should the future EU Affordable Housing Plan explicitly acknowledge and address the most deprived and excluded housing situations and the groups living in them?

EURoma Network believes that the forthcoming first-ever European Affordable Housing Plan must not overlook the reality of extreme housing vulnerability and exclusion. These severe forms of housing deprivation -affecting numerous vulnerable individuals, including a significant number of Roma across Europe, with children disproportionately impacted - are an integral part of the broader housing crisis that the Plan seeks to address.

What is not explicitly named often goes unrecognised. For this reason, situations of extreme housing vulnerability, deprivation and exclusion must be explicitly acknowledged and included among the core priorities of the future interventions to be promoted under the EU Affordable Housing Plan. These highly vulnerable housing conditions are not new. They have persisted for decades, and in many cases - particularly those affecting ethnic or racial minorities such as Roma -are compounded by structural discrimination. The current policy moment offers a valuable opportunity to address these issues through comprehensive, long-term solutions.

The persistence of these terrible housing contexts highlights the need to go beyond existing policy tools, which have so far proven insufficient to bring about meaningful change of these terrible situations. The new EU Affordable Housing Plan represents a powerful instrument to scale up efforts and deliver the structural impact needed to advance social cohesion and equal opportunities across the European Union.

2.1. The persistence of housing situations of extreme vulnerability and exclusion, affecting vulnerable groups such as Roma

Situations of extreme housing vulnerability and exclusion, notably situations of substandard, deprived and segregated housing, such as settlements, still persist throughout EU Member States, affecting a share of EU population, including many of the 12 million Roma living in the EU⁵.

The European Union Agency for Fundamental Rights (FRA)'s survey findings⁶ provide us with relevant information on the worrying living and housing conditions of Roma and the significant disparities

⁵ In the European Commission's report on the implementation of the national strategic frameworks for Roma inclusion, the European Commission reiterates the lack of up-to-date data on the number of people living in segregated housing. However, 8 Member States did indicate that they had an estimate of the extent of spatial segregation: Bulgaria, Croatia, Czechia, Greece, Italy, Romania, Slovakia and Spain.

⁶ FRA surveys considered include:

- Second EU Minorities and Discrimination Survey Roma (EU-MIDIS II) (2016) <https://fra.europa.eu/en/publication/2016/second-european-union-minorities-and-discrimination-survey-roma-selected-findings> Covers 9 EU Member States: Bulgaria, Croatia, Czechia, Greece, Hungary, Portugal, Romania, Slovakia and Spain.
- Selected findings Roma and Travellers Survey 2019 <https://fra.europa.eu/en/project/2018/roma-and-travellers-survey-2018-2019>. Covers 6 EU Member States (Belgium, France, Ireland, the Netherlands, Sweden and the United Kingdom).
- Roma and Travellers in six countries (2020) https://fra.europa.eu/sites/default/files/fra_uploads/fra-2020-roma-travellers-six-countries_en.pdf

compared to the general population, including as regards environmental quality and risk of energy poverty:

- **Overcrowding.** Roma Survey 2024 indicates that 83% of Roma surveyed lived in overcrowded houses. Roma Survey 2021 shows that, overall, 82 % of Roma lived in overcrowded households in 2021, compared to 18% and 17% of the general population in 2020 and 2024 respectively, with no improvement since 2016 EU-MIDIS II. According to the Roma and Travellers Survey 2019, half of the Roma and Travellers (48 %) were living in overcrowded households.
- **Housing deprivation.** According to the Roma Survey 2024, 16% of Roma report living in housing that is too dark; 23 % in housing with leaking roofs, damp walls or rot in window frames. This means that almost half of Roma (47%) experience housing deprivation across the surveyed EU countries covered. This is somewhat less than in 2021 (52%), but still approximately three times as many as among the general population across the EU (18%). In addition, less than one in five Roma households (17%) did not have access to tap water inside the home in 2024. Overall, around one in 10 interviewed Roma and Traveller households reports in 2019 that there is no access to tap water or a shower or toilet inside its dwelling/caravan. These shares are higher among those respondents who live in caravans or mobile homes.

When focusing specifically on Roma children, the Roma Survey 2024 reveals alarming levels of housing deprivation. Overall, Roma children up to 15 years old face higher rates of housing deprivation (52%). They are significantly more likely to live in overcrowded households (93%) and in homes without access to running water (22%).

- **Housing insecurity** strongly affects Roma and Travellers in the EU. According to the Roma Survey 2024, 10% of Roma were living in a household that had been evicted from their accommodation or halting site or were forced to leave by authorities in the five years prior to the survey. The Roma and Travellers Survey 2019 shows that travelling as a way of life is the most important reason for moving (25%). However, evictions, failure to extend a contract, and financial reasons force Roma and Travellers to move as well. Across survey groups, 4 % of the respondents have been evicted at least once. Meanwhile, 9% of the Roma and Travellers expected the authorities to evict them or force them to move in the next 6 months.
- **Tenure status.** Roma Survey 2024 and Roma and Travellers Survey 2019 show higher ownership rates for Roma and Travellers, respectively 53% and 42% (though often linked to caravans or other living arrangements), but considerably lower shares of respondents and their household renting from a private landlord: 9 % in 2024 and 18 % in 2019.
- According to the Roma Survey 2024, 22% of Roma live in a household which faces **environmental problems**, such as **pollution** and **grime**, or smoke, dust, unpleasant smells or polluted water in the local area. Every fifth Roma and Traveller household (22%) is affected by such environmental problems in their local area. By comparison, according to the Roma Survey 2021, 15% of the general population across the EU-27 is affected by similar conditions. There is a notable difference between

- Roma in 10 European Countries-Roma Survey 2021. <https://fra.europa.eu/en/project/2020/roma-survey-2020-2021>. Covers 8 EU Member States (Croatia, Czechia, Greece, Hungary, Italy, Portugal, Romania and Spain) and 2 accession countries (North Macedonia and Serbia).

- FRA survey on Roma and Travellers (2024): <https://fra.europa.eu/en/project/2024/roma-survey-2024>. Covers 10 EU Member States (Bulgaria, Czechia, France, Greece, Hungary, Ireland, Italy, Portugal, Romania and Spain) and three accession countries (Albania, North Macedonia and Serbia), touching upon the same areas of life as the previous Roma Survey 2021.

types of housing. Those living in caravans face environmental problems in their local area more often than Roma and Travellers living in houses and apartments (26% versus 17%) caravans.

- **Energy poverty.** Data collected between 2019 and 2022 from different FRA surveys on hard to-reach populations, while not directly comparable, show that Roma (21%) and Roma and Travellers (15%) have a considerably higher risk of experiencing energy poverty than the average in the EU-27 (9% in 2022).
- Difficulties in **securing and keeping housing and paying associated costs.** According to the FRA's data, in 2024 Roma Survey 2021, 17% of Roma lived in households that were unable to pay for their rent or mortgage in the 12 months preceding the survey; 45% had fallen behind on utility bills twice or more; 20% could not afford to keep their home adequately warm.
- 2016 Survey on Minorities and Discrimination in EU shows that 67% of Roma respondents live in **neighbourhoods where all or most residents share the same ethnic background.**

Discrimination as a transversal challenge

To these elements, we should add the systemic discrimination in access to housing, as evidenced by different reports. According to **FRA's Roma Survey 2024**, 26% were prevented from renting a house or apartment because of their Roma background in the last 5 years. Results from FRA's Roma Survey 2021 show that a quarter of the Roma in surveyed EU countries (24%) experienced discrimination due to being Roma when trying to rent or buy housing in the 5 years before the survey. According to FRA's Roma and Travellers Survey (2019), almost half of the respondents (48%) report being discriminated against when looking for housing in the five years before the survey.

Based on the **2023 Eurobarometer survey on discrimination in the EU⁷**, Roma people often experience discrimination and harassment in the workplace, in public spaces and when looking for housing (around 15% of Roma report having experienced discrimination in all of these areas). In general terms, the report shows that Roma experience the most widespread discrimination of all the groups considered.

Discrimination in the area of housing, as well as in other areas of life, is exacerbated when ethnic origin intersects with other factors (the so-called **intersectional discrimination**) such as gender, disability or demographic or socioeconomic hardship. As a way of example:

- The prevalence of racial and ethnic discrimination in housing is highest among young people aged 16-24 years, at 43%, and it decreases by age, reducing to 22% among respondents aged 60 years or over.
- Racial and ethnic discrimination can exacerbate the condition of people in disadvantaged socioeconomic status, for example those at risk of poverty or in severe social and material deprivation. FRA's Roma and Travellers Survey (2019) show that in the surveyed countries, on average, Roma and Travellers living in a household that is only able to make ends meet with (great) difficulty are notably more likely to be discriminated against when looking for housing, compared to who not face these difficulties (57% versus 41%).

⁷ <https://europa.eu/eurobarometer/surveys/detail/2972>

The dual discrimination affecting **foreign Roma and those non-European Roma** (without the European citizenships) is also worth noting.

All of this data provides clear evidence of the existence of serious conditions of vulnerability and inequality, particularly affecting vulnerable groups such Roma, underscoring the need to duly consider them in the forthcoming European Affordable Housing Plan. Failure to do so would risk perpetuating these situations and would undermine the Plan's ability to fulfil its objective of guaranteeing affordable, sustainable, and decent housing for all European citizens.

2.2. The need to step up efforts to comply with the existing policy frameworks and achieve expected housing targets

While EU Roma Strategic Framework identifies the *'access to adequate, non-segregated housing and essential services for the European Roma population'* as a core objective, and despite the adoption of multiple policy documents by the European Parliament and the European Council addressing this issue - particularly the situation of settlements across the EU- no tangible progress has been observed on the ground. **The first-ever European Affordable Housing Plan offers a timely and robust framework to intensify efforts, ensuring alignment and compliance with existing policy commitments and enhancing the mobilisation of EU Funds in support of priority housing solutions.**

The **EU Roma Strategic Framework for equality, inclusion and participation for 2020 - 2030**⁸ includes as one of its objectives *'Increasing effective and equitable access to adequate, non-segregated housing and essential services for the European Roma population'*, reflected in three specific targets:

- Reduce the housing deprivation gap by at least one-third, to ensure that by 2030 the majority of Roma people do not face housing deprivation (housing deprivation among the Roma population is estimated at 61% compared to 17.9% of the general population).
- Reduce the overcrowding housing gap by at least half (78% of Roma people are estimated to live in overcrowded housing compared to 17.1% of the general population).
- Ensure that at least 95% of Roma people have access to running water (it is estimated that 70% of the Roma population has access to running water in their homes, compared to 97.7% of the general population).

In subsequent reports on the implementation of the EU Framework and the related National Roma Strategic Frameworks (NRSFs), the Commission assessed progress in this area, including with regard to housing segregation, and encouraged Member States to continue their efforts. In its 2023 assessment report on the NRSFs⁹, it highlights that existing national plans appear to be insufficient to eliminate housing segregation entirely.

The Commission also strongly encourages Member States to **make full use of EU funding** (ESF+, ERDF, InvestEU, and the National Recovery and Resilience Plan) to contribute to improving the living conditions and development prospects of marginalised Roma communities and Roma living in low-income households at risk of poverty and social exclusion. It calls on Member States to provide general social housing in desegregated areas, accompanied by measures to promote access to education,

⁸ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52020DC0620&qid=1759123089061>

⁹ https://commission.europa.eu/publications/assessment-report-member-states-national-roma-strategic-frameworks-full-package_en

employment, and general health and social care, and develop or update local actions and implement desegregation plans.

In addition, other European institutions have adopted reports in this area, including those addressing the situation of Roma living in settlements:

- The **European Parliament** adopted in 2022 a Resolution addressing specifically the **situation of Roma living in settlements in the EU**¹⁰, where it acknowledges that ‘an unacceptably high number of Roma people in Europe still live in poverty and are socially excluded, enduring extremely precarious, unsafe and overcrowded living conditions in segregated rural and urban areas’. In this sense, it calls on the Commission and the Member States to urgently address the situation of Roma living in settlements comprehensively and effectively, with appropriate short- and long-term policies supported by sufficient EU and national funding, in order to ensure that Roma in the EU and neighbouring countries are not left behind. It calls for prioritising desegregation approaches that use or invest in integrated social housing, as well as funding for quality, accessible social services and quality on-the-ground social work involving consultation and participation with members of the Roma community to ensure Roma leave settlements.

At EU level, it is particularly relevant the call on the European Commission to step up its efforts to gradually eradicate marginalised Roma settlements across the EU by launching an **EU action plan to eradicate Roma settlements by 2030**. This action plan should provide guidelines, establish priorities and concrete targets and envisage a component of transnational cooperation and exchange of positive practices between Member States.

- In the **European Council** Conclusions on measures to **ensure equal access for Roma to adequate and non-segregated housing and addressing segregated settlements (2023)**¹¹, this body invites Member States, in accordance with their respective NRSFs, to take concrete measures to improve the housing situation of Roma and eradicate housing segregation where segregated Roma settlements exist. It recalls that various financial instruments, such as the ESF+, the ERDF, and rural development programmes at national and regional level, as well as instruments and initiatives under NextGenerationEU and InvestEU, are available to this end. It is important to ensure effective complementarity in the use of various sources of funding.

An important point of the adopted text is that, **for the first time in an EU regulatory framework, there is a consensus on a definition of ‘segregated settlements’**, i.e. slums and substandard housing settlements of an informal and stable nature, with physical, functional and/or social isolation, where the objective conditions related to housing, poverty and access to rights and public services are significantly worse as compared to the rest of the population, which should contribute to a common understanding and framework of the situation.

¹⁰ https://www.europarl.europa.eu/doceo/document/TA-9-2022-0343_EN.html

¹¹ <https://data.consilium.europa.eu/doc/document/ST-13517-2023-INIT/en/pdf>

3. Proposals for the future European Affordable Housing Plan

EURoma Network puts forward the following proposals for the future European Affordable Housing Plan to effectively contribute to address the needs of the most vulnerable groups such as Roma and the most critical housing conditions, including substandard and segregated housing, which disproportionately affect them.

1. **Explicit acknowledgment and consideration of the most severe situations of residential vulnerability, deprivation and exclusion, and the vulnerable groups affected by them, such as Roma**
2. **Complementarity with objectives and targets with the existing EU instruments and initiatives**
3. **Boost the use of EU Funds to tackle most severe situations of residential vulnerability and exclusion, ensuring complementarity and coherence with other European financial instruments**
4. **Enhancement of governance mechanisms to improve coordination and cooperation between all relevant stakeholders**
5. **Promotion of mutual learning and exchange among relevant stakeholders**

Before proceeding with the development of proposals, EURoma wishes to emphasise the importance of establishing a clear definition of 'affordable housing' in order to enhance understanding of what is regulated under the European framework concerning access to and the enjoyment of affordable and adequate housing. While national differences may exist, at a minimum, a definition could be adopted, one that sets out basic minimum standards while allowing for adaptation to diverse national contexts. Such a definition could encompass both soft aspects (e.g., target number of units, beneficiary profiles) and hard aspects (e.g., number of rooms, available facilities), as well as affordability in terms of cost. It is equally important to distinguish between 'affordable housing' and 'social housing' to clarify the specific concepts and policy approaches associated with each.

1. **Explicit acknowledgment and consideration of the most severe situations of residential vulnerability, deprivation and exclusion, and the vulnerable groups affected by them, such as Roma**

The current housing crisis, affecting a large share of the society, including low- and middle-income households, **should not divert attention and interventions from the persistent situations of severe housing vulnerability, deprivation and exclusion** - notably substandard and segregated housing such as settlements- **and the persons living in them, who are mainly Roma or migrant families, many of them children**. On the contrary, it should be seen as an opportunity to address them, ensuring that they can benefit from the measures proposed while also anticipating any possible risks.

Against this background, it is essential that the future European Affordable Housing Plan explicitly acknowledges and takes into consideration:

- The **situations of severe housing vulnerability, deprivation and exclusion, notably substandard and segregated housing, such as settlements**.

- The **groups most affected by these situations, such as Roma**, which face distinct challenges in their access and sustainable enjoyment of decent, affordable and sustainable housing. **In addition to the structural (and unresolved) challenges they have been facing over time, they are now disproportionately affected by the current housing crisis.** The challenges faced by society at large are in their case aggravated by the previous situation as well as by the existing discrimination. This is particularly alarming for those living in the situations of extreme vulnerability such as the ones mentioned above, but it also happens when they live in ordinary social contexts.

Evidence shows that explicit, but not exclusive, mention to Roma is a necessary (although not sufficient) condition for acknowledging and raising awareness of their specific situation, as well as for strengthening efforts to address it. It signals public authorities (at national, regional and local levels) and other stakeholders the need to focus on them and helps guide/focus actions and investments (whether targeted or mainstream) and make them more focused and effective towards the promotion of social change, real equality and non-discrimination of Roma in the EU. In addition, it is proved that when Roma are not explicitly named and considered -instead being assumed to be included in broader interventions/investments targeting disadvantaged or marginalised groups - they become invisible and therefore, often overlooked. It is frequently the case in mainstream and territorial approaches (as could be the case of many of the ones used as regards general housing policies and interventions).

This **explicit acknowledgment and consideration** should happen **in all aspects of the future EU Affordable Housing Plan**, including:

- **The inclusion of the situations of severe housing vulnerability, deprivation and exclusion affecting vulnerable groups such as Roma as specific targets of the EU Plan.** While particular attention is to be paid to the most extreme situations such as settlements, the EU Plan should also address the widespread worrying living and housing conditions faced by vulnerable groups such as Roma (as evidenced by the data provided in section 2.1.), including substandard and segregated housing within ordinary neighbourhoods. The mapping of the situation (at national/regional/local levels) is a crucial first step for the identification of the needs, the design of the actions, the matching with the funding sources and the monitoring.
- **The definition of measures to counter these situations.** Specific measures are needed to ensure that the most vulnerable and socially excluded housing situations, such as those experienced by European Roma population, are addressed and that low-income households and those facing social exclusion also can benefit from decent, affordable and sustainable housing. Possible measures include:
 - **Investments for rehousing populations out of settlements** specifically articulated with the support of EU Funds and other financial instruments.
 - **Safeguards and guarantees to ensure equal access to social housing schemes for the most disadvantaged groups.** Investments on social housing schemes promoted under the European Affordable Housing Plan should **establish certain criteria, including priority criteria**, that guarantee access for the most vulnerable groups, especially those from rehousing processes. Additionally, desegregation criteria must be respected in allocating public and social housing to prevent the concentration of vulnerable groups, including Roma.

- Measures to **address the discrimination** faced by vulnerable groups such as Roma in their access and enjoyment of affordable, decent and sustainable housing, in compliance with the existing EU and national frameworks to fight discrimination and racism. Among them, ensuring that the mediation services for accessing housing include non-discrimination criteria and operate guaranteeing the principle of equal access to housing.
- The situations and groups at greatest risk of residential vulnerability and exclusion such as Roma should also be taken into account when considering the **measures related to the green transition/energy efficiency, as well as digital transformation**, in order to ensure that they can benefit from the range of opportunities this may offer (by when needed, include targeted measures, explicit mention, safeguards, measures...), while at the same time preventing and counterbalancing any negative economic and social impact that it may bring for them in terms of aspects such as energy poverty or digital gap, contributing to preventing an increase of inequalities and that no one is left behind. This should be also reflected in policy instruments such as the EU's affordable energy action plan, the Citizen's Energy Package (ensure energy affordable for all), etc.

Consideration must be given to the **roles and responsibilities of the various stakeholders with competencies in this field**, ranging from public authorities at the national and, where relevant, regional levels, who are responsible for policy development and funding, to local authorities entrusted with the management of urban planning, housing initiatives, and the welfare of their communities. Indeed, there is a dual responsibility: the state must develop policies, while local governments are charged with ensuring the well-being of their residents. This reflects the distributed and complementary nature of governance in this field, where policy frameworks at higher levels guide action, but effective implementation and community welfare depend on local authorities.

- **The monitoring framework.** It is important that the monitoring framework follows closely the implementation of such measures to tackle severe residential situations by including adhoc indicators or other monitoring mechanism that allow assessing whether the objectives are met, and the interventions have reached the most vulnerable situations and groups.

The **long-term sustainability of implemented measures** should also be considered. In the context of housing construction and provision, sustainability should be assessed over several decades, rather than being confined to the currently prevailing five-year evaluation period. It is important to acknowledge that the procurement or construction of affordable housing entails significant financial, material, and human resource commitments. Consequently, it is advisable to conduct ongoing monitoring of the sustainability of supported housing initiatives over the long term.

This should also be applied at the level of the Member States and likewise, in accordance with the internal organisation of each country and the distribution of competences, extended to the regions and local authorities with responsibilities in the area of housing.

2. Complementarity with objectives and targets with the existing EU instruments and initiatives

The new European Housing Plan should be **aligned and in coherence and synergy with existing EU policy instruments and initiatives, both specific** (EU Strategic Framework for Roma Equality,

Inclusion and Participation) **and mainstream** (EU Anti-Racism Strategy, the EU Anti-Poverty Strategy, new Action Plan of the European Pillar on Social Rights, EU Child Guarantee, Climate Social Fund and other measures related to green transition and energy efficiency...) with a view to complementing each other and contributing to an enhancement of the outcomes through a more integrated and effective support.

In addition, **the future Plan should be seen as an opportunity to contribute to reinforcing the compliance with the current policy initiatives and proposing the development of additional measures** when needed to redouble efforts to end up once for all the situations of severe housing deprivation and inequality faced by certain groups such as Roma. Reinforcing the efforts to reduce and alleviate the situation of Roma children living in settlements without the minimum living conditions, should be the utmost priority in synergies between the Child Guarantee initiative, the future EU Affordable Housing plan and the EU Strategic Framework for Roma.

The **'EU Action Plan to eradicate Roma settlements by 2030'**, which was requested by the European Parliament in its 2022 Resolution, **should be considered as part of the European Affordable Housing Plan and articulate all these needed investments in synergy.**

The **'EU Action Plan to Eradicate Roma Settlements by 2030,'** as mandated by the European Parliament's 2022 Resolution, **should be incorporated within the framework of the European Affordable Housing Plan to coordinate all necessary investments in synergy.**

The European Plan should also be **connected with policy instruments related to the green transition** such as the EU's affordable energy action plan, the Citizen's Energy Package (ensure energy affordable for all), etc., which we trust take full into account the specificities of the situations and groups at greatest risk of residential vulnerability and exclusion such as Roma.

Alongside this, the **future mobilisation of human resources for the jobs needed to expand the housing construction sector** could also include the **training and hiring of the most disadvantaged youth**, including Roma, enabling them to benefit from the increased labor opportunities generated by the implementation of the EU Affordable Housing Plan.

3. Boost the use of EU Funds to tackle most severe situations of residential vulnerability and exclusion, ensuring complementarity and coherence with other European financial instruments

The alignment of the objectives of the EU Affordable Housing Plan and the current (2021-2027) and future (2028-2034) Multiannual Financial Framework (MFF) is crucial to promote the use of the potential of the EU Funds in achieving the objectives of the Plan.

Evidence shows the key role that European Funds, notably ESF+ and ERDF, can play for social issues and social cohesion in general and to reduce disparities and inequalities in the different areas, including in the field of housing, by targeting the groups and situations of greater exclusion and vulnerability. In this sense, **more efforts should be done to take full advantage of the (still underused) potential of ESF+ and ERDF (separately and in complementarity) in this field to address the challenges housing situation of most vulnerable groups as well as the persistent situations of extreme housing vulnerability and exclusion.**

This should be considered **both for the current programming period as well as for the next Multiannual Financial Framework**. As concerns the **2021-2027 programming period**, the **recently adopted amendments to the ERDF and Cohesion Fund Regulation¹²** should be seen as an opportunity as they recognise 'affordable and sustainable housing' as a challenge and introduce it as a Specific Objective under several Policy Objectives. This opens up opportunities to introduce changes to ERDF and Cohesion Fund programmes that contribute to addressing the most critical housing conditions, including substandard and segregated housing, such as settlements.

As regards the **2028-2034 programming period**, while, given the persistent situation of inequality, there is **a need to maintain comprehensive support** (both through soft and hard investments) in the current areas of support (employment -including youth employment-, education and training, health, housing and essential services or fight against discrimination and poverty), support in the area of housing should be reinforced. They should go beyond the challenges related to current housing crisis for society as a whole and address the situations of substandard and segregated housing. The earmarking of funding for eradicating settlements where Roma people live could be considered.

The new **Platform for Sustainable Affordable Housing** should also ensure that there is a correlation between priority objectives (situations of extreme housing vulnerability and exclusion and vulnerable groups) and the investment conditions offered to Member States to fund the housing policies.

Building upon the experience related to the funding interventions related to housing and to vulnerable groups such as Roma, the following elements should be taken into account:

- The **use of a comprehensive mapping of the situation and critical needs** as a starting point to identify and prioritise the needs and match it with the existing funding sources.
- The **reinforcement of low-performed housing targets of the existing policy framework for Roma equality and inclusion** at national (National Roma Strategic Framework) or regional levels.
- The **long-term and large-scale perspective of the interventions** (in terms of dimension/budget) to allow for timeframes and economic resources adequate to the needs and the objectives to be achieved. Tackling structural residential exclusion is a complex issue that needs the proper approach, requires time, sufficient resources and adequate stakeholders' involvement and coordination.
- The effective cross-sectoral **cooperation between the bodies responsible for the policy framework in charge of Roma equality and inclusion** (National Roma Contact Points), **other sectoral ministries and those managing the funds - as well as coordination among the fund-managing bodies themselves-** is essential. **Vertical cooperation between the state level and the regions/municipalities is essential**. The **political will** plays a pivotal role for setting the necessary efficient coordination mechanism to that end.
- The **combination of soft investments** (e.g. social accompaniment) **and hard investments** (e.g. infrastructures, equipment...). Therefore, the importance of the **complementary use of ESF+ and ERDF** to combine investments with the same goal: the fight against poverty and the promotion of equal opportunities for all.

¹² Regulation (EU) 2025/1914 of 18 September 2025 amending Regulations (EU) 2021/1058 and (EU) 2021/1056 as regards specific measures to address strategic challenges in the context of the mid-term review https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202501914

- The **use of integrated approaches** that go beyond the housing aspects and involve holistic interventions in areas (such as employment, education, health and others) that contribute to improve economic and living condition and maintain them.
- The **consideration of principles related to prevention of segregation and promotion of desegregation** in all housing interventions in order to ensure that existing situations of segregation are not perpetuated or deepen.
- The **explicit consideration of the situations and/or groups at risk of vulnerability and/or exclusion in the funding cycle**, from the planning and the design of the calls to the monitoring and evaluation. This is essential to ensure that they are targeted. This is particularly important in the housing field as in many cases interventions are considered and implemented following mainstream/territorial approaches, focusing on territorial units (at local, regional or national levels).
- The consideration of **mechanisms that allow for renewing and giving continuity to pilot and/or short-term actions that prove their value and success**, allowing for their consolidation/extension/scaling up during the same programming period (or beyond, when relevant).
- The use of **approaches that have proved relevant** in general housing interventions and/or more specifically in interventions related to the most excluded situations, including:
 - The **importance of social accompaniment** during the whole intervention process. The accompaniment of the supporting teams throughout the whole process is crucial and therefore the necessary budget and resources should be foreseen to this end.
 - The **search for definitive solutions**, avoiding the establishment transitional measures in an isolate manner, not as part of a medium-long term plan aiming at achieving definitive solutions. Otherwise, it would mean to transfer and postpone the problem in time or even aggravated it, and subsequently made the solutions costlier.
 - The **use of dual-approach strategies**, designing explicit but not exclusive actions focused on the target population, which are aimed at standardising and promoting access to ordinary resources and services, building a bridge between the needs of the Roma and the mainstream services they are entitled to use or benefit from.
 - The combination of direct and indirect interventions understood as:
 - Direct interventions targeting the target group.
 - Indirect interventions targeting the context in which the actions take place, including policy, legislative and institutional frameworks (e.g. finding ways to systematically reflect the social condition when there are requirements related to the mortgage or the loans) or actions to contribute to transforming the predominant narratives, combatting stereotypes and promoting a realistic, diverse and current image of the Roma population, as well as to encourage mutual understanding and coexistence).

4. Enhancement of governance mechanisms to improve coordination and cooperation between all relevant stakeholders

Considering the complexity of the housing area, cooperation and coordination between all relevant stakeholders is essential. In order to improve the effectiveness of public policy implementation and achieve the intended impact, **stronger and more effective governance mechanisms for coordination and cooperation between the bodies coordinating the EU Affordable Housing Plan and all**

relevant stakeholders is essential in all phases, including the design, implementation and monitoring (starting from the definition of objectives, targets, measures, and impact indicators):

- **The authorities in charge policies targeting the specific target groups and sectoral ones both at EU and national levels.** Between European Commission representatives in charge of the design, implementation and monitoring of the Affordable Housing Initiative and those in charge of other relevant EU initiatives such as the EU Framework for Roma equality, inclusion and participation, the Anti-Racism Strategy, the future EU Anti-Poverty Strategy...

In this sense, it is **essential the regular, meaningful and formal dialogue and coordination processes with the bodies in charge of the EU Strategic Framework for Roma Equality, Inclusion and Participation** (including European Commission representatives and National Roma Contact Points) **for programming, implementing and monitoring actions.**

- **The authorities in charge of the EU Funds, notably ESF+ and ERDF.** In order to make the best possible use of the European financial instruments at the disposal to implement the Plan's objectives, ensuring complementarity and coherence of these financial instruments and other EU Funds. Considering the crucial role of ESF+ and ERDF, close cooperation with ESF+ and ERDF Managing Authorities is crucial.
- **The outstanding role of municipalities as those bodies responsible for implementing housing measures and key decisions** within each EU Member State. The decentralisation of competencies to local governments can present certain challenges, since they have a say in decisions related to evictions or restrictions of residence affecting Roma populations, but also in situations where the allocation of responsibilities for ensuring access to affordable housing, as well as addressing environmental burdens and waste management in marginalised Roma communities, may not be clearly defined among the relevant actors.
- **Specialised stakeholders close to the ground and to the target groups**, whether it is a public authorities or Civil Society Organisations (CSOs). Their involvement is crucial to understand the needs and to ensure reaching the relevant target groups and guaranteeing the social accompaniment.

The **capacity-building of key stakeholders** constitutes a critical component in fostering more effective cooperation and coordination.

5. Promotion of mutual learning and exchange among relevant stakeholders

Exchange and discussion have proved crucial to learn from each other and support the development and sharing of innovative approaches and methodological tools (including pilot projects).

The European Commission could **facilitate mutual learning and the exchange of practices between Member States.**

The **EURoma Network will continue playing its role as platform for engaging partners in mutual learning and the exchange of positive experiences in the area of housing**, as well as on how the use of EU funds can play a critical role in this endeavour.

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