Includ-EU

Regional and local expertise, exchange and engagement for enhanced social cohesion in Europe.

Housing

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IOM is committed to the principle that humane and orderly migration benefits migrants and society. As an intergovernmental organization, IOM acts with its partners in the international community to: assist in meeting the operational challenges of migration; advance understanding of migration issues; encourage social and economic development through migration; and uphold the human dignity and well-being of migrants.

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Includ-EU project description

Recognizing and leveraging the diversity of territorial approaches and expertise on integration, Includ-EU aims to contribute to building more inclusive and cohesive European societies by enhancing transnational knowledge and experience sharing, cooperation and partnerships between local and regional authorities from Greece, Italy, the Netherlands, Romania, Slovenia and Spain. Funded by the Asylum, Migration and Integration Fund of the European Union, the project focuses on:

a) improving knowledge and capacities to facilitate the integration of third country nationals,
b) implementing and assessing pilot projects that promote the integration of TCNs at regional and local level;
c) setting an informal network of regions and local authorities with different levels of expertise. The Includ-EU project capitalizes on the diversity of territorial approaches as well as existing policy and practice in the area of integration.

Aim of the briefing

One of the project's component specifically aims to enhance local and regional actors' knowledge and capacities to implement innovative integration measures, including through the analysis of proven integration practices and formulation of thematic policy recommendations. This briefing forms part of a complex exercise which included the mapping of successful multi-stakeholder, multi-level and public-private partnerships active in the different dimensions of third-country nationals' (TCNs) inclusion, as outlined in the new EU Action Plan on Integration and Inclusion 2021-27, in the six target countries of the Includ-EU project.

This briefing analyses the housing context for migrants in Greece, Italy, the Netherlands, Romania, Slovenia and Spain; focusing on possible implications for their integration prospects. It also presents innovative practices contributing towards improving access to adequate and affordable housing for TCNs and issues recommendations to policy makers on holistic housing policies for migrants in the EU.

Brief introduction to the Action Plan on Integration and Inclusion

At the end of 2020, the European Commission presented the new EU Action Plan on Integration and Inclusion 2021-2027 (hereafter the Action Plan). While the responsibility for integration policies lies primarily with the Member States, the EU has established a large variety of measure to incentivise and support national, regional and local, authorities as well as civil society in their efforts to promote integration. The current action plan sets the EU's integration policy priorities, proposes concrete actions, provides guidance and delineates funding opportunities to translate policy into practice. The policy priorities established by this Action Plan include: inclusive education and training; improvements of employment opportunities and skills recognition; promotion of access to health services with a focus on streamlining gendered needs; and access to adequate and affordable housing.

The housing pillar of the EU's Action Plan places emphasis on the need to ensure affordable accommodation and promote non-segregated, dignified, accessible, and affordable housing. In this respect, tools for integration and inclusion are mainly in the hands of national, regional, and local authorities, while action at the European Union level is aimed at facilitating and promoting collaboration.

The right to housing under international human rights law

The right to adequate and affordable housing is recognised in several international human rights law instruments as a fundamental right. For this reason, ensuring access to housing is a core component of integration policies targeting TCNs.

Beyond its strictly material aspect, upholding the right to housing is considered crucial for human dignity and personal development, as well as a precondition for the enjoyment of other rights. Article 25.1 of the Universal Declaration of Human Rights states that "[e]veryone has the right to a standard of living adequate for the health and well-being of himself and his family, including food, clothing, housing, medical care and necessary social services (...)." The same provision is restated by Article 11 of the International Covenant on Economic, Social and Cultural Rights which purports the right to a decent standard of living, including access to housing.

Addressing widespread discrimination is a top priority of integration governance to uphold the fundamental right to housing. The International Convention on the Elimination of All Forms of Racial Discrimination mentions that "States Parties undertake to prohibit and to eliminate racial discrimination in all its forms and to guarantee the right of everyone, without distinction as to race, colour, or national or ethnic origin, to equality before the law, notably in the enjoyment of the following rights: (...) the right to housing"(Article 5 (e) (iii)).

For specific target groups, particularly for those TCNs that receive international or subsidiary protection, additional support and services are available. Article 21 of the Convention Relating to the Status of Refugees specifies that "[a]s regards housing, the Contracting States, (...) shall accord to refugees lawfully staying in their territory treatment as favourable as possible and, in any event, not less favourable than that accorded to aliens generally in the same circumstances" [emphasis added].

Housing conditions for TCNs in the EU

Recent data on access to housing in the EU suggests that securing adequate accommodation has become increasingly difficult in the last decade. Between 2010 and 2019, house prices saw a steady upward trend with a total increase of 19 per cent. Rents went up by 13 per cent during the same period, with increases in most Member States (Eurostat 2020a: 12).

As house prices and rents go up, housing costs take up a large portion of the household budget and can become a burden. On average, in 2019 households used a fifth of their disposable income to cover housing expenses. The same figure reaches 39.3 per cent for people considered at risk of poverty (Eurostat 2020a: 15).

As a result, 11.8 per cent of the EU population living in cities was overburdened by housing costs. This means that housing costs represented more than 40 per cent of disposable income. By contrast, only 7 per cent of households living in rural areas experienced housing cost overburden (Eurostat 2020a: 15), with accommodation away from urban areas be generally more affordable.

Data on housing conditions for TCNs indicate a higher risk of social exclusion and deprivation compared to the rest of the population. In 2019, TCNs in the EU were most likely to be living in an overcrowded household (36%), while the same figure for national citizens was around 17 per cent (Eurostat 2020b).

TCNs also faced the highest housing cost overburden rate in the EU. Around 25 per cent of them struggle to meet housing expenses, compared to 19 per cent of residents from other EU Member States and 9 per cent of national citizens (Eurostat 2020b).

Despite being entitled to housing on the same footing as other residents, practically TCNs face significant obstacles in accessing adequate accommodation in their host country.

Some of these obstacles are faced by other groups of residents, too, and include **housing unaffordability**, housing **supply/demand mismatch** in economically attractive areas, a stagnant housing market and rising construction costs, and **bottlenecks in public housing**.

High levels of **unemployment and job insecurity** pose other barriers affecting TCNs housing inclusion. Although TCNs are largely income producing, they often have weak or short-term contracts. As a result, they are unable to meet stringent guarantee requirements for rental contract and cannot afford to meet ever-increasing housing costs, especially in large urban centres or in areas with higher employment potential.

Other barriers to access to housing arise as a result of TCNs' status and include:
- **reluctance, discrimination or antimigrant sentiment**: this ranges from reluctance from landlords or opposition from neighbours to outright denial of accommodation. This often forces TCNs to accept exploitative and degrading housing conditions;
- **restrictive requirements** to access public housing, particularly residency requirements and deposit payments, which often prove discriminatory;

- **lack of information or knowledge** about legal entitlements and administrative procedures: **language barriers** make access to specialized information services more difficult.

These barriers to housing inclusion expose TCNs to higher risks of living in conditions of prolonged precarity, **marginalization**, and socio-spatial segregation, and to higher risks of eviction (FEANTSA and Abbé Pierre Foundation, 2018).

The availability of decent accommodation also plays a crucial role in enabling TCNs to **enjoy other rights** such as family reunification, access to healthcare, education, and the labour market, and, more broadly, to become full-fledged members of local communities.

TCNs living in precarious or informal accommodation, with undeclared housing contracts, cannot obtain their residency registration. Consequently, they are unable to access rights-related services. Addressing barriers to housing inclusion is crucial not only to uphold TCNs' housing rights, but to **defend a broader set of social rights**.

Some groups of TCNs may face **intersectional discrimination** when looking for accommodation and, therefore, deserve **special consideration**. Undocumented migrants cannot access housing programmes and are often excluded from emergency housing systems. Moreover, their absence from residence registries results in a general underestimation of real housing needs. Other groups like unaccompanied migrant children, TCNs facing health problems, seasonal workers, and victims of gender-based violence may require **targeted housing support measures**.

Impact of COVID-19 on access to housing for TCNs

The COVID-19 pandemic exacerbated already-existing social inequalities affecting TCNs and made access to adequate housing more difficult for them. While TCNs represent a small share of the population infected in Europe, the pandemic hit hard those facing precarious housing conditions or housing deprivation.

The **lack of adequate spaces for mandatory quarantine** was a problem faced disproportionally by TCNs. Those of them who were staying in reception centres, informal settlements, or were homeless found themselves unable to self-isolate and maintain physical distance. They also faced poor hygiene conditions because of confinement in overcrowded facilities. In some cases, like in Greek reception centres, movement of residents of reception facilities was restricted and exit was not allowed with the exception of one representative per family or group of residents to cover for basic needs.

Housing **deprivation, exploitation and segregation were made worse** by the sanitary emergency. As financial benefits end and economic recession and loss of jobs worsen, housing prospects become bleaker for TCNs. Rental prices have continued to go up, making leases unaffordable for a lot of people, including TCNs (Housing Europe 2021). One of the biggest concerns reported in the countries considered is the **loss of accommodation** due to job loss. This resulted in an increased demand for temporary, low-cost housing for those facing unemployment, including the native population.

Lastly, **lack of access to verified information about COVID-19** directly affected TCNs' health and wellbeing. Support services were closed to the public and had to be adapted to remote service

provision. **Administrative procedures took longer** due to the limitations imposed to clients' physical presence in the services. This led to longer waiting period to access social housing and leave reception facilities.

More generally, the pandemic shifted the attention away from existing challenges: as long as the structural factors mentioned in the introduction and the other challenges that TCNs face in accessing housing are not addressed, the situation is likely to deteriorate even further.

Mitigation measures

Against this background, existing best practices have been adapted to cope with the new challenges in housing and living conditions. Mitigating measures ranged from permits and eviction extension to direct financial support and increased access to information.

Some countries, including Italy, extended **residence permits** and other key documents in order to ensure access to the emergency support measures. The same **extension** was granted also with respect to permanency in reception centres for asylum seekers and international protection holders who were supposed to exit the reception system during lockdown. In Italy, municipalities were allowed to include second-tier reception centres (SIPROIMI) among the sites of self-isolation or quarantine.

As for **financial support**, in addition to other national benefits, some Regions in Italy provided additional rental support. Lazio, for instance, established a fund with this purpose, giving access to it to TCNs residing in the Region. The same measures were adopted by a number of municipalities, including Turin and Milan. The latter extended reception periods in night shelters until the end of May and opened a COVID-19 hotel where people with difficult housing situations could stay for free in case of required quarantine.

In addition to the reception and financial measures mentioned above, steps were taken to improve **communication and information services**. In the Netherlands, Parnassia Groep, Pharos and Arq National Psychotrauma Center developed the guide "An eye for diversity during the Corona pandemic", providing advice and practical tips to professionals who are responsible for the welfare of migrants. In Italy, several regions and municipalities published information on their websites and activated free-toll information numbers. The third sector and international organizations played an important role to make this possible.

Housing context in the Includ-EU countries

While the barriers and challenges described above are largely shared by all European countries, **country-level specificities** exist depending on migration history, overall economic and housing situation, and national welfare and integration policies.

Greece

Greece **lacks a coherent social housing policy** for vulnerable groups. **Cuts in social expenditure** in the mid-2000 crisis resulted in an abrupt increase in poverty and social exclusion (FEANTSA, 2012: 7). As a result, housing needs are traditionally addressed either by private entities or **informally** through family support networks, rather than through public policies.

Forms of housing support available include homelessness prevention services, emergency services, transitional accommodation, and housing and social integration services (Kourachanis, 2015: 114). **Emergency services** are the prevalent form of social support (Kourachanis, 2017). Among the existing **preventive measures**, rent subsidies are available for all residents, including TCNs who have been legally residing in the country for at least five consecutive years and fulfil specific eligibility requirements. As for emergency services, these include homeless day centres and night shelters. Local NGOs also offer soup-kitchen services, social pharmacies and social groceries.

National authorities are responsible for **reception programmes** for refugees and asylum seekers. The government funds HELIOS, a large integration programme implemented by IOM which seeks to decongest public reception centres and empower refugees in the search for private accommodation (see Box 1). The official accommodation system for asylum seekers consists of:

   a) accommodation in the reception and identification centres established in the North-eastern Aegean islands and in the North-eastern town of Fylakio;
   b) temporary accommodation centres (camps) in mainland Greece;
   c) accommodation and housing in apartments and buildings in urban areas.

Beyond the reception stage, under Greek law, beneficiaries of international protection are provided with all necessary assistance in matters of housing under the conditions applicable to Greek citizens, taking into account the need to ensure equal opportunities for access to accommodation.

As housing affordability and living conditions become increasingly precarious, in Greece, the majority of TCNs are overburdened by housing cost (70.2%), almost twice as much as Greek citizens (34.3%) who also struggle to afford the accommodation they live in. Almost half of TCNs live in an overcrowded household (49.7%) compared to 28.9 of Greek nationals (Eurostat 2020b).

The main challenges encountered by TCNs in Greece are:

- **language barriers**: upon exiting the reception system, beneficiaries of international protection have no knowledge of Greek. This poses problems for the timely fulfilment of administrative procedures to sign legally binding documents, including lease agreements;
- **insufficient funds** to cover initial housing costs;
- **poor dissemination of information** and service streamlining, leading to administrative delays;
- **reluctance or refusal of property owners** to rent to TCNs due to concerns that beneficiaries will be unable to keep up with monthly payments, concerns about damages to their properties, xenophobia;
- **shortage** of affordable and adequate apartments, especially in urban areas.

Italy

The Italian Constitution lists the right to housing at Article 47.2, establishing that access to housing shall be promoted through adequate social support measures. The Consolidated Law on Immigration disciplines access to housing for TCNs and grants access to public residential housing on **equal terms** with Italian citizens, provided that specific requirements are met.

For asylum seekers and international protection holders, housing is provided directly or indirectly by the state. Following the recognition of international protection, access to housing support and to the real estate market is governed by the same rules in force for non-EU citizens and on equal terms with Italian citizens. An additional period of reception, called SIPROIMI, is granted, if required.

Between 2001 to 2010, the number of individuals facing severe housing deprivation in Italy has tripled, although about 72 per cent of the population owns the house in which they live. Only 15.8 per cent of the total housing stock is **available for rent**, while only 2.7 per cent is related to public residential housing or social rent. Large metropolitan areas are those in which housing problems are concentrated, although rural areas also face problems of **social exclusion** and **ghettoisation**. In this context, housing problems affect 11.1 per cent of the population against a European average of 5.6 per cent. According to ISTAT (2015), in 2014 58.2 per cent of homeless people in Italy were foreign nationals.

According to a recent research carried out by IOM (2019), **distrust or discrimination** by potential landlords is one of the main obstacles in the path towards housing autonomy in Italy. Real estate agencies are often unwilling to act as intermediaries for potential TCN tenants. The networks of acquaintances or compatriots, therefore, make up for the lack of other channels to secure accommodation. Another critical issue is the **shortage of rental housing and the high costs**, especially in large cities, where properties are also taken up by tourist reception activities. By contrast, Italy has unused and decaying real estate in small towns and areas subject to depopulation.

To tackle these problems and the shortage of public housing, municipalities and third sector organizations have developed a series of innovative tools, commonly referred to as **social housing**. These initiatives are both promoted and funded by public authorities, third sector organizations, and private entities (e.g. philanthropic foundations, banks, and private citizens). These projects, however, are mostly small-scale and concentrated in few areas only.

The Netherlands

In the Netherlands, the housing cost overburden rate reaches 23.7 per cent among non-EU citizens, while it amounts to 10.9 per cent for national citizens (Eurostat 2020b). Similarly, only 4.6 per cent of Dutch citizens live in overcrowded conditions, while over a quarter (27.6%) of non-EU citizens do not have an adequate number of rooms at their disposal (Eurostat 2020b9).

Overall, in the Netherlands, the identification of available homes for resident permit holders is ultimately the responsibility of **municipalities**. Due to long-standing **housing shortages** affecting all residents, securing low-cost housing has reached crisis levels, with municipalities within the so-called Randstad (central provinces including the four largest cities) suffering the most.

To share this burden, all municipalities are assigned by the Dutch government a **quota** of resident permit holders and refugees for whom they must secure housing. The quota is based on the municipality's general population and the number of residence-permit holders on a waitlist for housing. During the 2015–2016 migrant reception peak, a number of **community-based housing initiatives** emerged. Those included creative solutions such as converting prisons into housing, accommodating migrants and students or the elderly together in institutional accommodations, and using holiday homes and recreational parks as housing. Some of these initiatives are still active as backup options in times of emergency.

The receipt of a residence permit, under the direction of the Central Agency for the Reception of Asylum Seekers (COA), allows asylum seekers to relocate from asylum reception centres into the local community and to participate actively in their own immersive integration.

Resettled refugees, on the other hand, are **pre-assigned housing** prior to their arrival in the Netherlands. As with other resident permit holders, the type of accommodation and its location are allocated from the social housing register based on individual profiles (employment history, education needs, medical concerns, family composition, etc.). Occasionally, single asylum seekers and refugees are housed together in shared housing arrangements. Resident permit holders are not provided with alternative options if they are not satisfied with the allocated house, though they are free to search for alternatives themselves without the support of COA or the municipality.

Resident permit holders are entitled to apply for social welfare to cover the cost of rent, and access to public loan schemes (or grants, depending on the municipality) to furnish their homes to their own tastes.

Romania
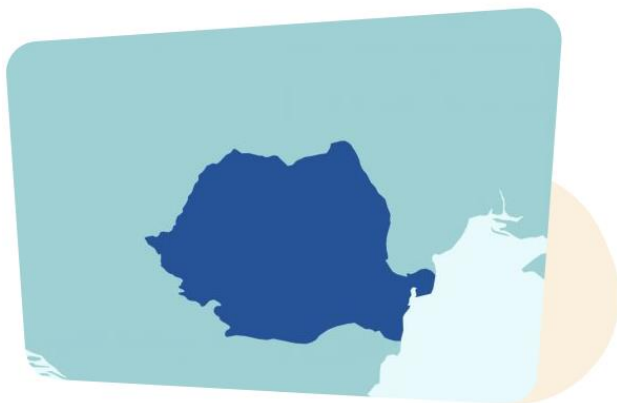
In Romania, international protection holders have **the same rights** to access social housing schemes as Romanian citizens. Local authorities are responsible for social housing provision within the limits of available resources. If there are no social homes available, the General Inspectorate for Immigration covers up to 50 per cent of rental costs on the private market for a maximum one year. However, only a small share of those who apply for social housing or rent subsidies actually receives them.

Renting a place on the private market in Romania is not as difficult as it can be in other countries in Western Europe, although prices reach **unaffordable** levels in more attractive metropolitan areas. The private real estate market is characterized by a high degree of **informality**, with related risks of **housing exploitation**.

Social housing in Romania gradually became a national problem after the fall of the communist regime. The wave of privatizations led to a sharp decline in the maintenance and construction of public housing. Since then, authorities have done little to encourage its construction. Unlike other countries in Western Europe where private and commercial investors also build public housing, in Romania, local authorities are the only ones responsible for its provision. As Romania ranks among the first countries in the European Union for social **housing deprivation**, addressing this issue remains an outmost priority.

Despite a general lack of specific data on access to housing in Romania, a major issue faced by TCNs in Romania is the **reluctance** of homeowners to give their property for rent to foreigners who do not speak Romanian and/or do not possess a residence permit. To obtain the permit, though, foreigners need to register a rental contract with tax authorities, a condition that many landlords are not willing to fulfil to evade taxes. In sum, widespread distrust towards foreigners makes it generally harder for TCNs to secure accommodation privately.

Slovenia

According to Article 78 of the Slovenian Constitution, the State must ensure that citizens are able to secure suitable accommodation. The 2015–2025 national housing programme recognizes the increasing inflow of population to urban centres due to international migration, as well as the need for more serious treatment of housing issues affecting migrants. However, the programme lacks measures that directly address this problem.

At the beginning of 2018, 80 per cent of migrants in Slovenia lived in small apartments. Data shows that average migrant households were 5.8 per cent smaller compared to the Slovenian average. In addition, home ownership among Slovenian nationals in 2018 amounted to 77 per cent, compared to 14.8 per cent among TCNs (Eurostat, 2020b).

Due to **shortage of dwellings**, both in the non-profit sector and on the private market, it is difficult to find affordable accommodation in Slovenia. In addition to this, migrants often face financial problems when renting an apartment and are more likely to live in **overcrowded accommodation** or **poorer living conditions** compared to native-born residents (OECD/European Union, 2015). Eurostat (2020b) data indicates that almost 40 per cent of the non-EU population in Slovenia lived in an overcrowded household, while the general overcrowding rate was 10.3 per cent. Around 13.5 per cent of TCNs in Slovenia experienced a burden in housing costs, as compared to 3.6 per cent of nationals.

The Government Office for Support and Integration of Migrants (UOIM) provides housing support to asylum seekers and international protection holders. Through a public tender, UOIM selects non-governmental organizations for the implementation of orientation and integration support. The scope of assistance provided includes job placement, opening of bank accounts, search for suitable private housing and communication with landlords, educational support, and counselling.

Migrants and refugees often experience **housing discrimination**, which can be subtle and difficult to prove. Many owners are not willing to rent their properties to migrants, especially large families, or refuse to register contracts. As a result, migrants face difficulties in accessing other social services.

Non-profit housing is accessible only to Slovenian and EU nationals who meet the condition of permanent residency in the municipality where the dwelling is located, as well as other criteria. International protection holders are entitled to housing benefits such as the right to monthly financial rent allowance for the period of 18 month, which can be prolonged for up to 3 years.

Lack of information and **language barriers** are two of the other challenges for migrants in Slovenia. Information on housing opportunities has been made available through different project-based initiatives, such as the DRIM initiative[1] or the website Info Tujci[2], maintained by the Slovenian Ministry of Interior.

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[1] Najemanje nepremičnin – Danube Compass
[2] InfoTujci – Informacije za tujce

Spain

Recent data on housing integration in Spain suggests that TCNs continue to face more difficult living conditions compared to Spanish nationals. Around 34 per cent of non-EU citizens is overburdened by housing expenses, while the same figure for Spanish nationals is 6.4 per cent. Accommodation conditions are also less adequate for TCNs compared to Spanish nationals. Only 4.4 per cent of the latter live in overcrowded conditions, while the same rate reaches 21.6 per cent for non-EU nationals (Eurostat 2020b).

Spanish law provides that foreigners with legal residency in the country have the right to access public housing assistance under the terms established by the competent authorities. Foreigners with long-term residency permits are entitled to such assistance under the same conditions as Spanish nationals.

The Spanish reception system, managed by the Ministry of Inclusion, Social Security and Migration (MISSM) is designed to secure housing to migrants, asylum seekers and refugees who have entered Spanish territory. Reception centres for asylum seekers are mainly financed by MISSM and managed by NGOs. Housing for people who hold international protection is provided in state-funded facilities for up to 18 months (or 24 months for extremely vulnerable cases). During this period, refugees receive support in finding independent accommodation. Irregular migrants are also sheltered in accommodation facilities funded by the Government and run by several NGOs across Spain. The time of stay in these facilities is up to three months, although extensions are granted for vulnerable cases.

The State-run reception model in Spain, regardless of the profile of beneficiaries, includes support provided by social workers, access to health, psychological support, job placement services, and others. Integration programmes are designed and implemented by **regional and local governments**, and vary significantly depending on the target group (i.e. refugees, asylum seekers, regular migrants, among others). Along with all the above-mentioned housing facilities secured with public funds, there are numerous programmes supported by private entities and religious organizations which shelter migrants regardless of their administrative status.

The **Municipal Register (Padrón Municipal)** is one of the specificities of the Spanish integration context. The Padrón Municipal is an administrative register where residents in the municipality are recorded. Registered data constitute proof of residence in the municipality and of the habitual address. All residents in Spain are required to register on the Padrón of the municipality in which they usually reside. For each resident, the registration in the Padrón contains only name and surname, sex, address, nationality, place and date of birth, ID number.

The Padrón is not only useful for statistical purposes. It is also indispensable to access municipal services as well as to carry out administrative formalities. Importantly, in some municipalities, foreigners can register regardless of their administrative status, thus being able to access municipal services.

Promoting more inclusive housing policies and practices for TCNs in Europe

Includ-EU countries have put in place a wide range of initiatives aimed at fostering TCNs' housing inclusion and improving access to the housing market. Measures include providing financial and material support in the search for accommodation, investing in collaborative housing solutions, and promoting the development of personal trust-based networks to contrast reluctance from landlords. Other good practices show how it is possible to work for greater housing inclusion while also contributing to urban regeneration and, more broadly, the welfare of the whole community. Last but not least, a number of actions in this field cater for special housing needs, including those of unaccompanied migrant children and TCNs facing health problems.

1. Ensuring financial and material support

A number of initiatives have developed to offer financial and material support to TCNs in the path toward housing autonomy. The transition from accommodation in reception facilities to private or public housing is a key step in the integration process and one where obstacles for newcomers sum up to other existing housing challenges existing at the national level.

To address these challenges and prevent housing exploitation, deprivation, and homelessness, **multilevel partnerships** have been put in place to offer **temporary accommodation** when needed, provide **tools to approach the private real estate market** or public housing, and support the search of a new home through **meditation** services. In

1 © William FORTUNATO / pexels.com

most cases, **financial support** remains a necessary tool to meet installation costs and secure apartments for rent, particularly in urban areas.

Significantly, measures to promote full housing autonomy come with a set of other initiatives regarding **job placement**, access to **services**, including **healthcare** and legal counselling, **language** training and mediation services. The examples that follow show how it is crucial to take a **holistic approach** to housing integration that also combines measures in other areas of integration policy.

Good practices at a glance

Promoting independent living through housing services - Greece

Implementing actor(s): IOM Greece, Catholic Relief Services (CRS), Danish Refugee Council Greece (DRC Greece), Greek Council for Refugees (GCR), Solidarity Now, INTERSOS, Municipality Development Agency Thessaloniki S.A. (MDAT), Metadrasi, Regional Development Agency PLOIGOS of Crete and the Public benefit agency of the Municipality of Livadeia KEDHL, Technology and Human Resources Institute (IATAP).

HELIOS is a pilot integration project that aims to support beneficiaries of international protection in their way towards integration into Greek society. The project offers services that promote independent living, including rental subsidies, integration courses, employment support, language training, integration monitoring, and sensibilization of the host community.

Eligible beneficiaries are supported in searching for an apartment, carrying out the relevant formalities, and submitting a lease agreement to apply for rental subsidies. The project activities are facilitated through:
- specialized workshops and one-to-one sessions on rental procedures and requirements;
- interpretation during apartment visits or translation of documents;
- facilitation of contacts with apartment owners;
- matching with other beneficiaries interested in sharing an apartment;
- moving costs;
- a website (www.heliospiti.com) with selected listings identified by IOM and its Accommodation Partners. The website is the go-to source where beneficiaries can find available properties, also counting on the project's mediation with landlords.

HELIOS is implemented by the IOM and its partners with the support of the Greek government and is funded by the Directorate-general of the European Commission for Migration and Home Affairs.

Regional and local authorities play a vital role in HELIOS. Some are partners in the project, provide the facilities for the local Integration Learning Centres, cooperate with IOM and other partners such as the Municipality Development Agency Thessaloniki S.A (MDAT), the Regional Development Agency PLOIGOS of Crete and the Public benefit agency of the Municipality of Livadeia KEDHL. Other regional and municipal authorities organize urban working groups on integration to exchange best practices and experiences. The Migrant Integration Councils (MICs) contribute to HELIOS by liaising with refugees and promoting project activities.

Lucca's House Agency – Matching supply and demand on the housing market – Italy

Implementing actor(s): Fondazione Casa Lucca (consortium of Municipalities of the Province of Lucca, third sector organizations and the Agency of Tenants and Houseowners).

Agenzia Casa was established in 1998 by the Municipalities of Lucca and Capannori upon Tuscany Region's initiative. As of today, it includes the municipalities of Lucca, Capannori, Porcari and Massarosa. It is managed and funded by Fondazione Casa Lucca, created in 2007 by the same entities.

The goal of Agenzia Casa is to offer housing support services to TCNs, including those exiting reception facilities, and Italian families facing housing difficulties by matching supply and demand on the private market.

Activities include:
- mediation services to find accommodation and conclude lease agreements;
- direct lease interventions;
- management of a guarantee fund to support beneficiaries and ensure the sustainability of the housing projects;
- trainings on housing rules and maintenance to build trust between owners and prospective tenants;
- consultancy services managed by the Agency's partners to guide beneficiaries to the housing support services available in the area, in collaboration with social services and third sector organizations;
- construction and management of real estate assets intended to provide short or medium-term hospitality (social housing, temporary accommodation, and co-housing projects);
- projects on housing inclusion and urban regeneration of depopulated areas.

All municipalities and third sector organizations involved are part of the Administrative Direction of Fondazione Casa Lucca which coordinates and monitors the activities.

The municipalities involved finance the guarantee fund, which covers contract stipulation and registration costs, and the management fund, which covers personnel costs. Trade unions, including the national trade union of houseowners and tenants, are also part of the project's network and, in addition to offering counselling services, oversee the general management of rental agreements.

Additional housing support for beneficiaries of international protection - Slovenia

Implementing actor(s): Government Office for the integration and support of migrants (UOIM) and NGOs selected through public competition.

UOIM aims to support beneficiaries of international protection in their search for suitable and affordable accommodation upon leaving reception facilities. To this end, UOIM has two integration houses and other accommodation available free of charge. Younger international protection holders that are still in school have access to student dormitories under the same conditions as Slovenian nationals.

UOIM coordinates all activities concerning accommodation. Integration counsellors take care of supporting each beneficiary in the house search with the help of an interpreter. UOIM is also responsible for giving information on the house search process with the assistance of partner NGOs. This way, international protection holders have access to different accommodation types depending on their needs.

Finding "A New House" in Cluj-Napoca - Romania

Implementing actor(s): Social and Medical Assistance Directorate, Municipality of Cluj-Napoca.

"A New House" is an initiative of the Municipality of Cluj-Napoca. It aims to provide material and medical assistance to vulnerable families and individuals irrespective of their country of origin, religion, age, gender. The services offered include monthly financial support, meals provided by the Social Eating House of the Municipality, counselling and employment advice, support in enrolling migrant children in school, psychological counselling, financial support for rent, and allocation of social houses.

The need to consider TCNs as eligible to receive support was identified by the Social and Medical Assistance Directorate in the first integration project funded under the AMIF National Programme in 2016–2017. The project was implemented in partnership with the Human Defence League Cluj-Napoca and IOM. It saw the direct involvement of TCNs living in Romania to identify their specific needs.

The Social and Medical Assistance Directorate is responsible for assessing the economical and medical situation of each family or person requesting support. If the families or persons meet the eligibility criteria, the Directorate prepares an intervention plan. Usually, this involves support in accessing a monthly financial support for covering the costs for renting an apartment, social houses, medical services, educational services, meetings with potential employers.

2. Supporting collaborative housing solutions

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Virtuous initiatives across Includ-EU countries show that collaborative housing solutions are successful in meeting **immediate housing needs**, fostering **social inclusion** in the local community, and building longer-term **housing autonomy**.

Collaborative housing solutions range from shared flats for youngsters to solidarity buildings that cater for different categories of residents with housing or social fragilities. These initiatives help residents **cut living costs** and create **stronger interpersonal ties** (see Section 3). Collaborative housing also addresses the needs of the **local community**, showing that inclusion of TCNs is beneficial for all involved.

As a new model of coexistence in urban and non-urban spaces, collaborative housing has shown to be **transferable** across countries and local contexts, responding to housing problems by promoting relations of proximity and **solidarity** between generations and cultures, and through **mutual support** and participation in socialization activities.

Good practices at a glance

Auntie Gessi's House in Turin: a comprehensive response to local housing needs - Italy

Implementing actor(s): Implementing actor(s): Fondazione Compagnia di San Paolo, together with the Municipality of Turin and several third sector organizations.

The "Solidarity Building" located in Turin, Gessi Street, also known as Auntie Gessi's House, is an initiative established in 2008 by the Municipality of Turin, in partnership with the Salesian Youth Association and with the financial support of Fondazione Compagnia di San Paolo.

Gessi's House consists of 30 apartments, 18 apartments assigned to elderly in public residential housing, 8 apartments for vulnerable people reported by the Municipality's Social Services (including singles parents, single women, and young people at risk of social exclusion), and four for "foster

families" who support the other residents. Temporary residents live in the apartments for up to 18 months. TCNs are both temporary beneficiaries as well as foster families.

Gessi's House includes a centre of Turin's Social Services open to the neighbourhood and a Day Centre for the Elderly, whose activities are managed with the support of the tenants.

The project aims at promoting a model of coexistence based on cross-generational and cross-cultural solidarity and mutual help. The goal of the Solidarity Building is to foster the temporary residents' autonomy and the development of long-lasting solidarity networks among residents. To achieve this, the project includes participatory planning and activities management involving tenants.

Auntie Gessi's House served as a model for similar projects in Turin, elsewhere in Piedmont, and in Liguria. It is also a meaningful example of public-private partnership, with both the Municipality and Fondazione Compagnia di San Paolo contributing to the project.

The Municipality of Turin owns the building and oversees both its management and the selection of new tenants. The Salesian Youth Agency manages the project and, together with its network, provides tailored support to the beneficiaries, organizes activities for the neighbourhood, trains foster families and oversees all financial aspects. Fondazione di Compagnia di San Paolo contributes financially and by sharing its expertise in facilitating access to housing.

Auntie Gessi's House's residents play a key role in the success of the project. The Solidarity Building also enjoys the support of NGOs and private entities like the Adecco Employment Agency, which takes care of the tenants' labour inclusion.

Parma's Tandem - building youth's housing autonomy - Italy

Implementing actor(s): CIAC and the Municipality of Parma

Tandem is a co-housing and social networking project established in 2016. It targets Italians and international protection holders aged 18–29. The initiative offers an intercultural experience combined with professional training and "active citizenship" activities.

Tandem develops across two apartments located in the city centre of Parma, loaned by a private and by a religious association respectively. Tenants pay a reduced rent and take part in a 20-hour training course offered by CIAC to make their skills available to the project and to other local social inclusion initiatives.

The co-housing experience lasts from 9 to 12 months and creates "micro communities" of young people within each housing unit. Tenants are also called to actively participate in the life of the local community through awareness-raising campaigns and voluntary activities. These activities are promoted by CIAC Onlus in collaboration with Solidarity Forum, the local Intercultural Centre, the University of Parma, the Network of Schools for Peace, and Movimento dei Focolari. After a training period with CIAC workers, Tandem tenants organise activities for the local community, including neighbourhood services, activities for the elderly (e.g. home shopping), theatre workshops, entertainment shows for children, and Italian courses.

Tandem represents an example of mutual support that takes a community-based approach to social inclusion. By facilitating social networks and informal support, it strengthens social cohesion and intercultural dialogue. The volunteer activities carried out by co-housers have a double impact at the community level: they support the most vulnerable people living in the area where the apartments are located and facilitate the development and consolidation of social networks (Section 3).

While adopting a multi-stakeholder approach, this initiative focuses also on empowering refugees in a delicate moment of their integration path (i.e. leaving the reception system) and ensuring the sustainability of their housing inclusion by strengthening their social networks.

The activities are implemented by the Municipality of Parma together with CIAC, which manages and monitors the co-habitation experiences, provides the training courses, and offers additional support through other ongoing initiatives. Co-housers also have a key role and are called to play an active part in the life of the community.

Being part of the SIPROIMI reception system, Tandem is part of the coordination and monitoring mechanism put in place by the SIPROIMI Central Service and the National Association of Italian Municipalities (ANCI).

3. Developing trust/based housing networks

As **discrimination** or **reluctance** from landlords remain considerable obstacles to TCNs' housing autonomy, building trust-based support networks provides a solution to immediate and longer-term housing needs.

Personal trust-based networks developed through collaborative housing solutions (see Section 2) or through targeted initiatives **narrow down perceived differences** between TCNs and other residents, **facilitate** the provision of material guarantees, and **strengthen** the positive effects of material housing support.

In fact, projects that respond to immediate housing needs while also fostering the development of trust-based interpersonal networks are particularly successful for three reasons. They respond to short-term housing needs, promote **TCNs' membership** and sense of belonging in their new local communities, and increase the chances of **finding future accommodation** autonomously through recourse to personal support networks.

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Good practices at a glance

Xarxa d'Hospitalitat - Hospitality Network in Barcelona - Spain

Implementing actor(s): Fundació Migra Studium

Xarxa d'Hospitalitat ("Hospitality Network") is an initiative of the Migra Studium Foundation and the Jesuit Service for Migrants in Barcelona.

The Network provides accommodation to migrants for up to 9 months with a "buddy" or accompanying person. The goal of the network is to create links between migrants, foster homes, and buddies, promoting individual autonomy.

In 2019, over 50 foster homes have joined the Network and 39 foster homes have been set up, including 6 for minors. Since the creation of the project, 63 families and communities have joined the network, providing shelter and hospitality to 65 people.

During the COVID-19 emergency, in response to a growing need for housing, the Network has been enlarged by opening the Arrupe Community, a hospitality community located in Sant Cugat del Vallès (Barcelona province) in facilities provided by the Society of Jesus. A maximum of 10 people will live together there, accompanied by the Migra Studium team and volunteers. For the future, the network works to increase the number of families willing to host migrants.

Promising Matchmaking (Kansrijke Koppeling) – Making relocation work in the Netherlands

Implementing actor(s): Central Agency for the Reception of Asylum Seekers (COA)

In the Netherlands, upon receipt of an asylum permit, migrants are permitted to relocate from the asylum reception centre to a pre-identified house in the country. Until 2017, migrants were relocated at random to receiving municipalities based on the availability of housing. Kansrijke Koppeling (or "promising matchmaking") is an effort of COA to identify the municipality and accommodation type best suited to individual profiles prior to relocation.

The initiative builds upon the assumption that when migrants reside in geographic locations that match their career ambitions, health needs, family needs, network and educational needs, they are also better placed to integrate faster. When selecting the appropriate municipality for relocation, career ambitions are strongly considered, in order to optimize the labour market integration potential of migrants.

Prior to relocation, COA staff compile the profiles of migrants through discussions about their background. This information is transferred to an online database that assigns quotas to each municipality. After the match, COA staff and the receiving municipality exchange information to

prepare for the relocation, including identifying appropriate accommodation and providing support in accessing the labour market.

4. Urban regeneration

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Adequate housing is often unaffordable or unavailable in large urban centres, with increasing pressure being put on the real estate market by tourism and rising demand from residents able to offer more guarantees than incoming TCNs. Away from the main cities, other areas are subject to depopulation and have increasing shares of unused and decaying real estate.

Small municipalities have a great potential for social inclusion. They offer not only abandoned, vacant or underused properties, but also smoother access to affordable housing and employment opportunities. More generally, in small municipalities it is also easier to develop social networks that enhance integration prospects. At the same time, housing opportunities in rural, depopulating areas poses its own set of challenges. Issues like remoteness, harder access to services and employment opportunities, and the risk of isolation suggest pursuing the twin goals of urban regeneration and housing inclusion require accompanying mitigating measures.

The good practice below suggests that, once these mitigating measures are set up, fostering TCNs' access to housing through urban regeneration projects is a win-win solution that revive local communities, avoid concentration in big metropolitan areas, and create opportunities to build a new life. In other words, this shows how it is possible to ensure that TCNs find accommodation that is adequate while, at the same time, creating cascading benefits for the local community's economy and social life.

Good practices at a glance

Reception in small municipalities and country capitals - Spain

Implementing actor(s): Department of Labour, Social Affairs and Families (DTASF) of the Catalan Government, Consell Comarcal (County Council), local economic actors, NGOs.

Through this programme, refugees who arrive in large cities are redistributed across the region with the collaboration of the Generalitat de Catalunya (Committee for the reception of refugees and mentors of the Mentoring programme), Town Councils, County Councils, the Service of Public Occupancy of Catalonia (SOC), social organizations for refugee reception, and neighbourhood organizations.

The aim of the programme is to improve refugees' access to the housing and labour markets by avoiding concentration in big metropolitan areas and reviving depopulating villages. When an interested family is identified, the programme ensures that relocation takes into account the professional profile and education needs of family members. Through the Table for the Reception of Refugees, for example in the region of Terra Alta, job offers and housing requests are disseminated to host organizations, who provide support to the interested family. The County Council, the Mayors and the Generalitat de Catalunya (Reception and Mentors Committee) also collaborate in the relocation process.

The Project is promoted and evaluated by the Reception Committee for Refugees of the Generalitat de Catalunya and it has been promoted in different regions of Catalonia, especially in Terra Alta, Les Garrigues, Pallars Sobirà, Pallars Jussà, La Segarra and Ripollès.

5. Addressing special needs

Removing barriers to access to housing for TCNs require an approach that tackles problems broadly felt by **the whole local population** (e.g. housing shortage, unaffordability, job insecurity), as well as specific integration issues (e.g. access to the labour market, access to services, and language training).

Despite the importance of this **integrated approach**, TCNs with **special needs** may face additional difficulties in securing adequate accommodation. This is the case, for example, for TCNs with special healthcare needs who struggle to meet housing costs independently. For unaccompanied migrant children it is important to ensure not only appropriate living conditions, but also tailored protection and personal development services, including psychological and legal assistance, and access to education.

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In these cases, the provision of adequate accommodation should come with targeted and empowering solutions that promote individual wellbeing.

Good practices at a glance

Murcia's Shelter for Integration and Care - Spain

Implementing actor(s): Murcia Acoge

The Shelter for Integration and Care of Convalescent Migrants has been established in 2001 upon an initiative of the Government of Murcia. The Government later decided to delegate the programme to NGOs Murcia Acoge and Caritas, with the former progressively taking up the leading role.

The project's facilities offer housing and healthcare to adult migrant men and women who suffers from temporary illness and cannot afford to pay a rent or cover their housing expenses. Beneficiaries also lacks family members or reliable social networks in the Region of Murcia. Important, services are provided regardless of legal status.

Target beneficiaries are mainly migrant workers, but other profiles of migrants (non-workers) can also get access to the programme. In the Region of Murcia there is a considerable presence of seasonal

workers from Eastern Europe and Africa, many of whom suffer from temporary illnesses or occupation accidents and require longer medical leaves. Pregnant women also have access to healthcare in the project's framework.

Migrants are usually referred to the project's facilities by the Social Services or by local Health Centres. In order to qualify for the programme, migrants should meet some minimum requirements (no financial resources, lack or inadequate housing conditions or/and lack of social networks, minimum autonomy to take care of basic domestic activities). The NGO staff carries out regular morning visit, providing food and maintenance services. The NGO staff also works on improving integration into Spanish society. The stay in the facility is initially limited to three months, but can be extended until full recovery.

The specific objectives of the programme are:
- adapt the homes to the needs of migrants who require specific medical care;
- request the support and collaboration of the migrants' relatives or social networks;
- provide free accommodation and food to migrants who lack resources and are recovering;
- provide comprehensive and individual attention to each beneficiary;
- provide medical and/or psychological care, informing the migrants about their health situation so that they can actively participate in their recovery;
- carry out training and learning workshops to facilitate their social inclusion;
- promote cohabitation;
- keep contact with residents after the end of their stay to support them if necessary;
- promote the project by seeking cooperation and the participation of a greater number of volunteers.

During the pandemic, Murcia Acoge was one of the few housing programmes still active. For this reason, it received a special recognition by the Regional Government of Murcia.

Murcia Acoge is responsible for running the programme. The Regional Government of Murcia is the donor of the programme. The Government also works very closely with Murcia Acoge through the Social Services.

The programme is evaluated based on periodic reports and through daily monitoring by the Murcia Acoge team. An annual evaluation is also conducted, mainly focusing of the profiles, illnesses and needs of the migrants.

Shelters for unaccompanied migrant children - Greece

Implementing actor(s): International Organization for Migration (IOM)

Currently, a total of 4,176 unaccompanied migrant children (UMC) live in Greece, with 62 shelters operating to accommodate them for a total of 1,637 places. Around 2,844 UMC reside in long-term accommodation, including shelters and semi-independent apartments, or temporary accommodation such as safe zones and hotels. Some 1,004 UMC live in informal or insecure housing conditions (squatting, homeless or moving frequently between different types of accommodation) (EKKA, 2020).

The lack of appropriate accommodation for UMC in Greece has led to the establishment of additional specialized shelters while also ensuring the operation of existing ones. This project consists of 6 shelters for UMC in Greece with a total capacity of up to 131 places. The Shelters were operated by NGO PRAKSIS until 31 December 2018, while IOM undertook operations as of 1 January 2019.

The services provided by IOM address the beneficiaries' basic needs by providing psychosocial support, legal counselling, and educational activities. In addition to appropriate living conditions, this project ensures the well-being, protection, and personal development of the children through tailored protection services by specialized professionals (e.g. direct psychosocial and legal assistance, educational activities) aiming at their integration into the local communities.

The shelters receive UMC through a placement mechanism managed by the Special Secretariat for the Protection of Unaccompanied Minors, in close coordination with the relevant regional Public Prosecution for Minors. The project is implemented in the regions of Attica, Thessaloniki, and Patra.

Includ-EU's contribution to housing inclusion

Includ-EU will involve the implementation and assessment of concrete pilot actions at the regional and local levels. In Italy, ANCI Toscana and IOM are piloting a project to invest in already-existing local networks and develop a model of public-private collaboration for housing inclusion.

According to the results of the research "Uneven opportunities. Immigrants and public residential housing in Tuscany", commissioned by the Department for Welfare and Housing Policies of the Tuscany Region, the need to promote housing integration in Tuscany has increased over the last few years. Initially, in fact, immigration was predominantly female and connected to domestic work, with little or no housing needed. Subsequently, family reunification led to an increase in stable immigration and new housing needs.

The same research also revealed that the vast majority of TCNs live in rented properties: 45 per cent with autonomous accommodation, and 20 per cent in cohabitation or accommodation provided by the employer. Regarding public housing, the presence of TCNs has been increasing over the last decade. In Florence, for example, it went from 13.5 per cent in 2000 to 43 per cent in 2010. However, immigrants' access to public housing proved to be more difficult than for Italians and with variations across municipalities.

After the 2008 financial crisis, the already difficult income situation of TCNs worsened, with a consequent increase in precarious housing solutions and episodes of eviction. Moreover, cases of inadequate or overcrowded accommodation and cohabitation remained more frequent among TCNs than Italians. Lastly, informal or precarious living conditions remain a considerable, but often non-visible, phenomenon.

Includ-EU pilot project

The purpose of ANCI Toscana's pilot project is to develop and provide a model that respond to temporary housing needs of migrants who are not entitled to reception services. Specifically, the pilot project will seek to:

- create a permanent network of social support to help migrants find a new home;
- strengthen the process of integration and emancipation;
- create and consolidate local public-private partnerships on housing emergencies;
- identify guidelines for participatory project design and management to support the transferability of the pilot project itself.

Significantly, the pilot project will be informed by a participatory and experimental approach. This means that it will include TCNs in ongoing collaborative housing projects that are currently being developed by public and private agencies in Tuscany.

The first step of the project consists of mapping and analysing different territorial responses to TCNs' temporary housing needs and selecting three territories for participant observation or field test. Subsequently, the project identifies social resources and key actors involved in providing concrete responses on the ground. The third step regards engaging, listening, and involving a group of migrants in co-design workshops together with residents of local communities. This step will have the goal of elaborating shared solutions. The last part will regard the implementation of the project to draw key lessons for its replication.

Overall, the expected outcomes of the pilot project will be:

- ensuring that beneficiaries have a main role in the organization and management of their home, interacting more with the housing community, and managing housing costs together;
- providing new tools and social resources to local communities to respond to housing needs of TCNs;
- integrating a participatory approach and collaborative housing model in the urban governance process;
- integrating outcomes of Includ-EU pilot project into regional reception, inclusion, and social cohesion policies.

Conclusions

Access to adequate housing is increasingly challenging for people living in the EU. Among them, TCNs are particularly overburdened by housing costs and struggle to access the real estate market due to increasing unaffordability, discrimination, and barriers to service access. Taking this into account and in order to uphold the right to housing for all, including TCNs, it is important to put in place measures that promote housing inclusion and contrast inequalities in this field.

⇒ This overview of best practices on access to housing across Includ-EU countries suggests that the following actions are crucial to uphold the right to housing of TCNs:

⇒ **Provide holistic housing support**: in order to be effective and long-lasting, actions in the field of housing inclusion should include material support (e.g. temporary or longer-term accommodation) and financial measures (e.g. guarantee funds). They should also pursue broader social inclusion goals, supporting involvement in local networks, and access to the job market, education, healthcare, and other services.

⇒ **Establish multilevel partnerships**: examples from Includ-EU countries show that it is key to promote the collaboration of national, regional, and local authorities and stakeholders in order to develop innovative housing projects.

⇒ **Engage with TCNs**: For the success of these projects, it is also crucial to engage TCNs and local communities in project design and implementation. As the good practices presented in this briefing show, this can be achieved in various ways depending on the project type and existing conditions. Forms of TCNs engagement can range from collaborative, co-housing projects to co-design and planning.

⇒ **Adopt far-reaching housing inclusion measures** that benefit larger segments of the population, including urban regeneration projects: TCNs' housing inclusion can and should benefit the whole community involved. This can be achieved, for example, by starting from the local community's needs when planning housing inclusion projects, or by opening the latter up to other residents who face similar housing issues.

⇒ **Design targeted interventions**: housing inclusion practices and policies should both be inclusive and address the needs of specific groups of TCNs, including unaccompanied migrant children, persons suffering from serious illness, seasonal workers, and victims of gender-based violence. More broadly, it is important to bear in mind that, while an increasing share of the EU population face housing difficulties, TCNs do face specific and, in some respects, greater challenges compared to other groups of residents, for example due to language barriers and discrimination. For this reason, it is paramount to make sure that housing inclusion measures remain targeted and specific, while also benefitting larger segment of the population.

⇒ **Systematically collect housing data to design more effective, evidence-based policies**: it is also crucial to undertake systematic data collection on evolving housing market dynamics, TCNs' access to housing, and local housing needs. Data availability on TCNs' access to housing would improve policy design and ensure that actions in this field address real needs and challenges.

⇒ **Take an integrated approach** to housing and social inclusion: housing and social policies are deeply interconnected. Remoteness in rural areas call for an integrated approach to ensure access to other services, including health and education. Housing inclusion in urban contexts require accompanying measures to allow access to services and counter the risks of segregation and exclusion.

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