

Submission to the European Commission in Response to the Call for Evidence on the Proposal for a Council Recommendation on Fighting Housing Exclusion.

07 April 2026

Executive Summary

Housing exclusion in the EU must be recognised as a structural issue, driven by housing shortages, rising costs and systemic inequalities, rather than individual vulnerability. Women, particularly single mothers, women with disabilities, elderly women, migrant women and survivors of violence are disproportionately affected. Yet they remain underrepresented in data and policy. Current approaches fail to capture hidden homelessness, where women rely on unsafe or temporary arrangements to avoid violence.

Shelter systems are often inadequate and unsafe, while short-term responses without long-term housing pathways trap women in cycles of homelessness and exploitation. Violence against women is a key pathway into homelessness. At the same time access to housing remains conditional, contrary to EU legal obligations. Migrant women face additional barriers, including discrimination, administrative restrictions and dependency on employers, increasing their risk of exclusion and abuse and deportation.

Problem Analysis and Key Issues

Housing exclusion should not be framed primarily as the result of individual vulnerabilities but consequence of structural inequalities and systemic failures, including housing market dynamics, welfare gaps and migration policies. While the call for evidence acknowledges structural factors, its continued reference to vulnerability risks shifting responsibility onto individuals rather than addressing the underlying causes of homelessness. **The Council Recommendation should explicitly recognise housing exclusion as a structural issue and ensure that policy responses focus on systemic drivers rather than individual characteristics.**

As acknowledged in the *European Affordable Housing Plan (2025)* and the forthcoming *EU Anti-Poverty Strategy*, the current housing crisis, including the shortage of affordable and social housing and rising rental costs as well as poverty is a central driver of housing exclusion across the EU. Women, particularly single mothers and migrant women, are disproportionately affected due to lower incomes and limited access to stable employment. **The Council Recommendation should call on Member States to expand the supply of affordable, social and non-profit housing and to adopt measures to address rising housing costs and ensure accessibility for low-income households. Housing policies must be explicitly inclusive and responsive to diverse needs, including those of women with disabilities by guaranteeing accessibility and safety and considering intersecting factors such as age, migration or ethnic background.**

A critical limitation in current approaches to homelessness is the systematic underrepresentation of women in both data and policy responses. Existing EU-level estimates refer to approximately 1 million people experiencing homelessness across Europe without specifying the number of affected women. This lack of sex-disaggregated data (inconsistent with the *EU Gender Equality Strategy*, which calls for improved

sex-disaggregated data across policy area) obscures the scale and nature of women's homelessness and contributes to policy frameworks that do not adequately reflect their lived realities. Additionally, the Commission call for evidence for Council Recommendations aims to suggest to *“emphasise person-centred, housing-led and integrated approaches to support people in precarious housing situations in both urban and rural areas. These may include for example young people, including students, with low financial means, families with children (including single parents) and older people in precarious housing situations, the long-term unemployed and those furthest from the labour market (including third-country nationals), persons with disabilities, LGBTIQ+ individuals facing discrimination and Roma communities.”* However, women as a distinct category are not explicitly recognised in the list, despite evidence that women's homelessness is systematically underrepresented in official data.

Data collection methods tend to prioritise visible forms of homelessness, such as rough sleeping, which do not reflect the lived realities of many women. Women are far more likely to experience hidden forms of homelessness as they often avoid sleeping on the streets due to fears for their safety. Instead, they rely on temporary and insecure arrangements, including staying with friends or extended family, remaining in hospitals beyond medical need or spending nights in places such as fast-food restaurants or other public spaces. While these situations may not meet narrow definitions of homelessness, it fits the broader homelessness vulnerabilities definitions of *European Typology of Homelessness and Housing Exclusion ETHOS* as well as UN definition that says that homelessness involves a broader *“disaffiliation process interrelated with poverty, lack of full and productive employment, decent work and access to infrastructure, as well as other socioeconomic issues that may constitute a loss of family, community and a sense of belonging”*. Thus, invisible homelessness represents severe housing insecurity as women do not have access to safe, stable and independent housing. **Their experiences remain largely invisible in official statistics, which limits effective policy responses and increases exposure to exploitation, including economic dependency, coercion and sexual violence.**

In addition, women experiencing homelessness face severe challenges in maintaining basic personal hygiene, in particular menstrual health, which directly impacts their dignity and health. Lack of access to safe and hygienic sanitation facilities as well as menstrual products forces women to manage menstruation in unsafe and degrading conditions. This is especially acute for women avoiding shelters due to safety concerns and women with disabilities who require adapted facilities. **The Council Recommendations should require Member States to ensure access to safe, private and hygienic sanitation facilities and menstrual products for women experiencing homelessness as an integral part of adequate and dignified housing.**

Older women and women with disabilities experience disproportionately high yet largely invisible forms of both hidden and visible homelessness across the EU, reflecting a critical gap in both data and policy responses. Their housing exclusion is shaped by intersecting structural inequalities related to sex, age and disability, often compounded by migration or socioeconomic status. Older women may face housing loss due to inheritance disputes following widowhood, financial exploitation or scams by caregivers or increased vulnerability to abuse and neglect, while some are pushed into exploitative situations, including in system of prostitution as a means of survival. At the same time, women with disabilities encounter systemic barriers such as inaccessible housing, lack of appropriate support services and heightened risks of institutionalisation or violence within both private and shelter settings. **The Council Recommendation should require Member States to adopt an intersectional approach to housing exclusion that addresses the diverse and intersecting needs of women, supported by improved data collection, accessible and safe housing, and tailored support services to ensure long-term stability and protection from exploitation and violence.**

Many women deliberately avoid accessing emergency shelters. A significant number of shelters across Member States are mixed-sex facilities. Such shelters are unsafe, particularly for women who have

experienced male violence or who are accompanied by children. This is also reflected in the standards set by the *Istanbul Convention*, which requires the provision of safe, sex-sensitive accommodation for survivors of violence. The lack of sex-segregated, trauma-informed and child-sensitive accommodation creates a structural barrier to accessing support, effectively excluding women from services that are formally available. **EU funding for housing must be contingent on the provision of safe, women-only spaces to break the cycle of re-victimisation.**

Even where shelters are available, they are frequently designed as short-term solutions, offering only temporary protection without ensuring pathways to long-term, stable housing. Women are required to leave after a limited period regardless of whether they have secured safe and independent accommodation. This creates a situation in which women in vulnerable situations are settled into continued housing insecurity placing them at high risk of re-exploitation, returning to abusive environments, or entering homelessness. **Without access to long-term housing, many women become trapped in a cycle between temporary shelters, unsafe arrangement and abuse.**

While housing-led approaches, including *Housing First* as promoted under the European Platform on Combatting Homelessness, are an important shift away from emergency responses, they must be adapted to reflect women's specific experiences. Women, particularly survivors of violence, require safe, sex-segregated and trauma-informed housing solutions, not only rapid access to housing. **The Council Recommendation should ensure that housing-led approaches are sex-responsive and integrated with specialised support services for survivors of violence and exploitation.**

Women experiencing homelessness, particularly single mothers, face structural barriers related to child custody and family reunification. In many cases, access to or retention of custody depends on having stable and adequate housing, yet as mentioned above, existing housing solutions are often temporary, overcrowded, or unsuitable for children. This creates a situation where women are expected to secure appropriate housing to reunite with their children while being unable to access it. **The Council Recommendation should therefore ensure that housing solutions for mothers are adequate in size, stability and quality to support family reunification.**

Access to housing for survivors of male violence must be unconditional. Currently, many Member States require women to prove they have exited exploitation or cooperate with legal proceedings to qualify for support. Women who have experienced violence against women, including domestic violence and trafficking are at heightened risk of homelessness. While some emergency shelters and specialised services exist, their availability is often limited, uneven across regions and insufficient to meet demand with restricted access by eligibility criteria. This results in women being denied safe accommodation and pushed into homelessness or forced to remain in or return to exploitative environments. **The Council Recommendation should therefore call on Member States to ensure immediate, unconditional access to safe and stable housing for survivors of male violence, independent of their cooperation with authorities or their legal status.**

Housing exclusion affects both urban and rural areas, but manifests differently depending on context. In rural areas, limited service provision, lack of shelters and geographic isolation can exacerbate women's vulnerability and restrict access to support. **The Council Recommendation should ensure that responses are adapted to both urban and rural contexts with adequate service provision and housing options for women, including women with children across all regions.**

Under the *EU Victims' Rights Directive (2012/29/EU)* and the *Directive on combating violence against women and domestic violence (2024/1385/EU)*, Member States are required to ensure protection and safety for survivors regardless of migration status. Migrant women, especially single mothers and those employed in informal or low-wage sectors, often face intersecting obstacles due to both sex and migration status.

Temporary shelter provision for migrant women across Europe remains highly inadequate, structurally exclusionary and unable to meet existing needs, despite clear evidence of increasing homelessness among migrant populations across EU. Migrant women face multiple, intersecting barriers to accessing shelter, including legal and administrative restrictions tied to residence status, which can exclude undocumented women or those awaiting decisions, as well as discrimination, language barriers and lack of information about available services. Moreover, these facilities are predominantly mixed-sex and short-term. **The Council Recommendation should ensure safeguards for migrant women can access housing without fear of immigration enforcement or discrimination.**

In addition to above mentioned, migrant women face compounded discrimination in accessing private housing, which further increases their risk of homelessness. In practice, access to rental housing often depends on background checks, proof of stable income and local references. These are requirements that vast majority of migrant women, especially single mothers are unable to meet, particularly upon arrival when they do not yet have stable residence status or secure employment. These barriers are strengthened by discriminatory practices in the private rental market. Landlords are often unwilling to rent out to migrant women without local documentation or may exclude applicants based on nationality, ethnicity, or perceived financial insecurity. As a result, many migrant women are left with no viable alternatives and are pushed into cycles of homelessness, informal arrangements, exploitative situations or face risks of deportation, which highlights a systemic failure to provide both immediate protection and sustainable housing pathways. **The Council Recommendation should therefore call on Member States to address discrimination in the private rental market and remove disproportionate administrative requirements to accessing housing.**

Migrant women engaged in domestic work face heightened risks of housing exclusion and exploitation, particularly where employment and accommodation are directly linked. Domestic work is predominantly carried out by women and many are employed in live-in arrangements where housing is tied to their employer, resulting in a lack of privacy, constant control over movements and on-call expectations, often combined with deductions for accommodation and food that create financial strain. These conditions limit women's ability to secure independent housing and reinforce dependency on employers. This vulnerability is further exacerbated for those in irregular or precarious residence situations, as insecure legal status restricts their ability to seek alternative housing or report abuse without fear of retaliation, job loss, or deportation. Thus, many migrant women domestic workers become trapped in a cycle of exploitation, housing dependency and exclusion. **The Council Recommendation should therefore call on Member States to separate access to housing from employment relationships.**

While housing policy remains a national competence, EU-level action plays a critical role in ensuring coordination, consistency and accountability. The Council Recommendation should strengthen EU-level guidance by promoting common standards, facilitating data comparability and ensuring that Member States address structural and sex-specific drivers of housing exclusion.

The Council Recommendation should:

Framing and recognition

- explicitly recognise housing exclusion as a structural issue and ensure that policy responses focus on systemic drivers rather than individual characteristics.
- explicitly include women, migrant women, single mothers, elder women and women with disabilities as well as survivors of male violence and exploitation as groups in precarious housing situations.

Data and evidence

- implement mandatory sex-disaggregated data collection across all Member States, including indicators capturing women's hidden homelessness and exploitation-related housing insecurity.

Housing access, inclusiveness, affordability and market barriers

- call on Member States to expand the supply of affordable, social and non-profit housing and to adopt measures to address rising housing costs and ensure accessibility for low-income households.
- housing policies must be explicitly inclusive and responsive to diverse needs, including those of women with disabilities and elderly women, by guaranteeing accessibility and safety and considering intersecting factors such as age, migration or ethnic background.
- require Member States to adopt an intersectional approach to housing exclusion that addresses the diverse and intersecting needs of women, supported by improved data collection, accessible and safe housing, and tailored support services to ensure long-term stability and protection from exploitation and violence.
- call on Member States to address discrimination in the private rental market and remove disproportionate administrative requirements to accessing housing for migrant women, including single mothers.

Protection, safety and sex-responsive housing

- require Member States to provide sex-segregated (women-only), safe and trauma-informed shelters and long-term housing solutions.
- ensure that housing-led approaches are sex-responsive and integrated with specialised support services for women survivors of violence and exploitation.
- ensure immediate, unconditional access to safe and stable housing for survivors of male violence, independent of their cooperation with authorities or their legal status.
- require Member States to ensure access to safe, private and hygienic sanitation facilities and menstrual products for women experiencing homelessness as an integral part of adequate and dignified housing.

Specific support measures and prevention

- should call on Member States to establish safe, low-threshold day spaces for women experiencing hidden homelessness.
- ensure that housing solutions for mothers are adequate in size, stability and quality to support family reunification.
- Migrant women and structural barriers
- ensure safeguards so that migrant women can access housing without fear of immigration enforcement or discrimination.
- call on Member States to separate access to housing from employment relationships.
- Territorial dimension (urban/rural)
- ensure that responses are adapted to both urban and rural contexts, with adequate service provision and housing options for women, including women with children, across all regions.

EU-level governance and implementation

- ensure that EU funding for housing is contingent on the provision of safe, women-only spaces to prevent re-victimisation.
- strengthen EU-level guidance by promoting common standards, facilitating data comparability and ensuring that Member States address structural and sex-specific drivers of housing exclusion.