

# FEASIBILITY STUDY FOR SOCIAL HOUSING IN EIGHT MUNICIPALITIES IN MONTENEGRO



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# FEASIBILITY STUDY FOR SOCIAL HOUSING IN EIGHT MUNICIPALITIES IN MONTENEGRO

(BAR, BERANE, BIJELO POLJE, BUDVA,  
HERCEG NOVI, KOTOR, NIKŠIĆ, ULCINJ)

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# Executive Summary

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This study was commissioned by the Council of Europe under the European Union/Council of Europe Joint Programme [Roma Integration III](#), implemented by the Roma and Travellers Division of the Council of Europe. The study was conducted in cooperation with the Ministry for Social Welfare, Family Care and Demography of Montenegro and examines the socio-economic conditions and housing needs of Roma and Egyptian communities across eight municipalities in Montenegro: Bar, Berane, Bijelo Polje, Budva, Herceg Novi, Kotor, Nikšić, and Ulcinj. Despite national and local initiatives, many Roma and Egyptian households continue to live in poor conditions with limited access to essential services. Key challenges include inadequate housing, lack of legal housing rights, and poor sanitation, particularly in marginalised areas. The findings also reveal significant income inequality, high poverty levels, and a lack of basic amenities, all of which negatively impact health and limit social inclusion.

The study provides a comprehensive analysis based on field research, interviews, and demographic surveys and offers a series of recommendations to improve living conditions, secure housing rights, and promote social inclusion. These include developing legally recognised housing through a phased legalization process for informal settlements, alongside upgrading infrastructure to provide access to essential services such as water, electricity, and sanitation.

The recommendations stress the need for a centralized database to track housing conditions, ensuring accurate monitoring and evaluation of interventions, and for support to be provided to municipalities to enhance their administrative capacity to implement these measures effectively. Targeted funding strategies are also recommended by the study and besides government allocations, additional support is encouraged to be sought through donor funding and public-private partnerships. Moreover, it is considered that aligning these initiatives with EU accession priorities and international human rights commitments can attract further financial and technical assistance in the field.

The study proposes further the establishment of a multi-tier governance structure to oversee housing initiatives. This includes forming a National Administrative Board with key ministries (Finance, Social Welfare, and Human Rights), a National Coordination Committee for project implementation, and an Im-

plementation Unit within the [Administration for Capital Projects](#) to manage construction activities. Clear mechanisms for selecting housing beneficiaries and transparent allocation processes are critical to ensuring fairness and effectiveness.

Furthermore, it is considered that housing policies and interventions should be integrated within broader social inclusion measures and therefore complemented by programs improving access to education, healthcare, and employment for Roma and Egyptian communities. Moreover, encouraging active community participation in decision-making processes will ensure that their needs and priorities are addressed effectively.

Finally, the feasibility study proposes a housing support project to be implemented in collaboration with national and local authorities. This project should prioritize the construction of adequate housing units and address long-standing issues such as sanitation and infrastructure gaps.

By implementing these recommendations, Montenegro can make significant strides in improving the living conditions of Roma and Egyptian communities, fulfilling its commitments to human rights and social inclusion while aligning with broader European Union and Council of Europe standards for Roma integration.



# Introduction

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The **Council of Europe** has long addressed the substandard housing conditions faced by Roma<sup>1</sup> communities, developing a comprehensive set of recommendations and standards to improve Roma housing. These standards focus on access to adequate housing, non-discrimination, participation in decision-making processes, and integration within broader urban and rural housing policies.

Key CoE documents include **Recommendation Rec(2005)4 of the Committee of Ministers to member states on improving the housing conditions of Roma and Travellers in Europe**, which calls for **non-discrimination** in housing access and the improvement of living conditions by ensuring proper sanitation, infrastructure, and access to public services. It promotes **desegregation** to prevent ghettos and foster integration within mainstream communities. **Article 31** of the **European Social Charter (ESC)** obligates states to ensure that affordable, quality housing is available for all, including vulnerable groups like Roma. This article has been pivotal in assessing Roma housing conditions and advocating for improvements.

The **European Committee of Social Rights (ECSR)** has ruled on several cases concerning Roma housing, often identifying violations of the European Social Charter, particularly regarding insecure tenure, forced evictions, and segregated housing practices. These rulings reinforce the importance of secure housing rights, as reflected in the **European Commission against Racism and Intolerance (ECRI)** reports, which regularly call for central and local authorities to eliminate housing discrimination and adopt equal access measures.

**The Framework Convention for the Protection of National Minorities (FCNM)** also stresses the need for Roma to have access to **adequate housing**

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<sup>1</sup> The term “Roma and Travellers” is used at the Council of Europe to encompass the wide diversity of the groups covered by the work of the Council of Europe in this field: on the one hand a) Roma, Sinti/Manush, Calé, Kaale, Romanichals, Boyash/Rudari; b) Balkan Egyptians (Egyptians and Ashkali); c) Eastern groups (Dom, Lom and Abdal); and, on the other hand, groups such as Travellers, Yenish, and the populations designated under the administrative term “Gens du voyage”, as well as persons who identify themselves as Gypsies. The present is an explanatory footnote, not a definition of Roma and/or Travellers.

that meets health and safety standards. In support of this, the [Parliamentary Assembly of the Council of Europe \(PACE\)](#) has issued several resolutions urging **integrated housing policies** and respect for Roma dignity in housing.

In parallel with these CoE efforts, the [Poznań Declaration](#) (Declaration of Western Balkans Partners on Roma Integration within the EU Enlargement Process), adopted during the **Western Balkans Summit in 2019**, further strengthens the commitment of European countries to improving Roma housing conditions. The declaration commits participating countries to addressing **informal settlements**, ensuring access to **essential services**, and improving **housing security** for Roma community closely aligning with CoE standards. It also highlights the importance of using **EU structural funds** and other financial mechanisms to support these housing initiatives. Addressing housing issues is also in line with the [EU Roma Strategic framework for equality, inclusion and participation for 2020-2030](#).

The **Ministerial Conclusions on Roma integration** under the [Berlin Process Summit](#) reinforce these principles, acknowledging the ongoing issues of **sub-standard housing**, **discrimination**, and **segregation** faced by Roma communities. Ministers committed to addressing these challenges by integrating Roma housing needs into **central strategies** and **action plans**, echoing both the CoE and the Poznań Declaration's focus on secure legalisation of the housing units and preventing evictions. The conclusions also stressed the importance of **equal access** to public housing services and the **integration** of Roma community into mainstream housing programmes, closely reflecting the CoE's emphasis on **non-discrimination** and the **desegregation** of housing policies.

Both the Poznań Declaration and the ministerial conclusions advocate for a **holistic approach** to housing that integrates housing policy with employment, education, and healthcare, thus addressing the broader social exclusion faced by Roma communities. The use of **EU structural funds** and international support, emphasised in both documents, aligns with CoE recommendations, which call for adequate resources to promote Roma inclusion.

In conclusion, the **Council of Europe's recommendations**, the **Poznań Declaration**, and the **Ministerial Conclusions related to Roma housing** all share a common commitment to improving the housing conditions of Roma communities through **non-discrimination**, the provision of secure and adequate housing, and **Roma participation** in housing policy decisions. Together, these frameworks promote a comprehensive, cross-sectoral approach to Roma housing inclusion, aiming to break the cycle of marginalisation and social exclusion faced by Roma community across Europe.

# Situational analysis

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The last official population census in Montenegro from 2023 shows that, on the territory of Montenegro, which has a total area of 13,883<sup>2</sup> square kilometres, there are 633,158<sup>3</sup> inhabitants. Since the data from that census related to the number of Roma and Egyptians in Montenegro has not been published yet, according to the 2011 census, 6,251 persons, or 1.01% of the population, declared themselves as Roma by nationality, whereas 2,054 persons declared themselves as Egyptians.<sup>4</sup> According to the estimates of the Ministry of Human and Minority Rights, the number of Roma and Egyptians in Montenegro is actually significantly higher than the Census data shows, and according to the data it is higher than 12,000.<sup>5</sup> According to the data of the Council of Europe, that number may be as high as 25,000.<sup>6</sup>

In numerous reports, among others, reports on the progress of Montenegro for 2022<sup>7</sup> and 2023,<sup>8</sup> it is stated that Roma and Egyptians are the community most drastically affected by their socio-economic situation and that their situation has further worsened in the aftermath of the COVID-19 pandemic. As it was stated in the 2023 Report on Progress, Roma and Egyptians are still exposed to “discrimination, hate speech and hate crimes”.<sup>9</sup> They also face numerous challenges in exercising their rights, and the protection of the Romani language is not in accordance with EU<sup>10</sup> standards and legislation.

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2 Montenegro in Figures 2022: *Statistical Office – MONSTAT*, 2021, Podgorica, Montenegro.

3 Preliminary results of the Census of the Population, Households and Dwellings in 2023: *Statistical Office – MONSTAT*, 2021, Podgorica, Montenegro.

4 Strategy for Social Inclusion of Roma and Egyptians 2021–2025, *Ministry of Human and Minority Rights*, 2021, Podgorica, Montenegro.

5 Report on the Implementation of the Action Plan of the Strategy for Social Inclusion of Roma and Egyptians 2021–2025 for the year 2022, *Ministry of Human and Minority Rights*, 2023, Podgorica, Montenegro.

6 Strategy of Social Inclusion of Roma and Egyptians 2021–2025, *Ministry of Human and Minority Rights*, 2021, Podgorica, Montenegro.

7 URL:<https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-10/Montenegro%20Report%202022.pdf> (accessed on 05/01/2024).

8 URL:<https://op.europa.eu/en/publication-detail/-/publication/66f8e-ded-7eee-11ee-99ba-01aa75ed71a1/language-en> (accessed on 05/01/2024).

9 Ibid (46).

10 Ibid.

# The key problem

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The Strategy for Social Inclusion of Roma and Egyptians 2021–2025 states that there are still a number of illegal, unhygienic and dilapidated buildings in which members of this population live, as well as many settlements without road, electrical and water infrastructure. This strategy states that solving their **housing** issue in the future will represent a real challenge for the state of Montenegro. Since 2016, 231<sup>11</sup> housing units have been provided for the Roma and Egyptian population in Montenegro. However, it is obvious that this has not significantly affected their overall housing conditions. Research on the socio-economic position of Roma from 2023 states that, even after the success of housing construction measures between 2016 and 2018, there is almost no difference between the distribution of Roma living in and outside Roma settlements between 2018 and now.<sup>12</sup> There is still no available database which would present the real housing conditions of Roma and Egyptians in a systematic and clear way, although this was a recommendation by the OSCE/ODIHR<sup>13</sup> back in 2003.

It should also be stated that the numerous existing datasets are merely the product of research studies, among which are: Regional Research on Roma (2017),<sup>14</sup> Multiple Indicator Cluster Survey (2018)<sup>15</sup> and Research on the Socio-Economic Position of Roma in Montenegro (2023).<sup>16</sup>

On 19 October 2022, a government session was held in Podgorica. It was at-

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11 Strategy for Social Inclusion of Roma and Egyptians 2021–2025, *Ministry of Human and Minority Rights*, 2021, Podgorica, Montenegro.

12 Socio-Economic Position of Roma in Montenegro, *Center for Democracy and Human Rights (CEDEM)*, 2023, Podgorica, Montenegro.

13 Regional Methodology on Mapping of Roma Housing, 2020: 19, *Regional Cooperation Council Roma Integration 2020 Action Team*, Belgrade, Serbia.

14 Third Regional Roma Survey, conducted by UNDP, the World Bank and the European Commission. URL: <https://documents1.worldbank.org/curated/en/646541554470226635/pdf/Regional-Roma-Survey-Briefs.pdf> (accessed on 05/07/2024).

15 URL: <https://www.monstat.org/uploads/files/MICS/FINAL%20Crna%20Gora%202018%20MICS6%20SFR.pdf> (accessed on 05/07/2024).

16 Socio-Economic Position of Roma in Montenegro, *Center for Democracy and Human Rights (CEDEM)*, 2023, Podgorica, Montenegro.

tended by the relevant ministers of Western Balkan countries,<sup>17</sup> who are responsible for the inclusion of Roma and who agreed to firmly support the agreed goals in order to stop discrimination against Roma and improve, among other things, the conditions related to **housing**.<sup>18</sup>

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17 Obligations are implemented in accordance with the definitions of the Declaration of the Western Balkan Partners on Roma Integration, and all within the EU enlargement process (Poznan Declaration).

18 URL:<https://www.gov.me/cyr/clanak/vlade-zemalja-zapadnog-balkana-cvrsto-podrzavaju-inkluziju-roma> (accessed on 05/01/2024).

## *Structure of the study*

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In all the municipalities which are the subject of this study (Bar, Berane, Bijelo Polje, Budva, Herceg Novi, Kotor, Nikšić, Ulcinj), the members of the Roma and Egyptian populations were recorded by the 2011 census. Therefore, **the first part** of the study will present the demographic and socio-economic characteristics of Roma and Egyptians in these eight cities in Montenegro, which will be surveyed after the conducted field research.

**In the second part**, the study will present the circumstances and possibilities of the living conditions of Roma and Egyptians in all eight municipalities, after conducting in-depth interviews with representatives of the municipalities, as well as with the representatives of the Ministry of Labour and Social Welfare and the Ministry of Human and Minority Rights.

**In the third part**, the study will briefly present an assessment of the legal and regulatory framework, taking into consideration the central and local legal framework related to this area.

**The fourth part** of the study will present the recommendations on how to permanently solve the housing issue of Roma and Egyptians in these municipalities, the mechanisms for implementing a potential project on the housing issue of Roma and Egyptians, as well as the recommendations regarding the funds necessary for such a project.

# FIELD RESEARCH ON THE DEMOGRAPHIC AND SOCIO-ECONOMIC CHARACTERISTICS OF ROMA AND EGYPTIANS IN BAR, BERANE, BIJELO POLJE, BUDVA, HERCEG NOVI, KOTOR, NIKŠIĆ AND ULCINJ

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## 1. EMPIRICAL RESEARCH

### ***1.1 Methodological framework of the research***

The research on the demographic and socio-economic characteristics of Roma and Egyptians in Bar, Berane, Bijelo Polje, Budva, Herceg Novi, Kotor, Nikšić and Ulcinj for the purpose of adequate adaptation of housing issues involves quantitative methods that will be conducted through the survey in substandard<sup>19</sup> Roma settlements and other places in these municipalities where it was found in the field that Roma and Egyptians live in inadequate housing units.

Prior to the quantitative part of the research, in analysing the reference literature, only a brief review was made of the number of inhabitants of Montenegro, the registered number and the living conditions of Roma and Egyptians in Montenegro, as well as of the key activities undertaken regarding the position of Roma and Egyptians in Montenegro. Primary and secondary data sources are used in the report itself.

The population from which the sample was taken is the total number of Roma and Egyptians living in these municipalities according to the official available data, i.e. according to the census data from 2011. In Nikšić, the sample is 446 Egyptians and 483 Roma; in Kotor, 63 Egyptians and 74 Roma; in Budva, 144 Egyptians and 33 Roma; in Herceg Novi, 28 Egyptians and 258 Roma; in Berane, 170 Egyptians and 531 Roma; in Bijelo Polje, 334 Roma; in Bar, 33 Egyptians

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<sup>19</sup> The term “substandard” implies areas where living and housing conditions are not at the level of generally accepted standards of adequate housing (Regional Methodology on Mapping of Roma Housing, 2020: 19, *Regional Cooperation Council Roma Integration 2020 Action Team*, Belgrade, Serbia).

and 203 Roma; and in Ulcinj, 73 Egyptians and 159 Roma.<sup>20</sup>

All the members of households<sup>21</sup> in substandard Roma and Egyptian settlements and other places in these municipalities, where it was assumed in the field that Roma and Egyptians live in unsuitable housing units, were selected from this population. Those households and their members represent the target group of *this study*, i.e. the target group for permanent solution of their housing issue.

All the households found there were surveyed.

The planned sample was realised. In Nikšić, 173 households with a total of 657 members were surveyed; in Kotor, 39 households with 185 members were surveyed; in Budva, 55 households with 200 members were surveyed; in Herceg Novi, 50 households with 203 members were surveyed; in Bar, 37 households with 189 members were surveyed; in Berane, 126 households with 683 members were surveyed; and in Bijelo Polje, 26 households with 97 members were surveyed.

The survey was conducted within the territory of all eight cities, on 10–18 June 2024, and the data processing provides data for all eight municipalities.

The reference period for all the data from this research is June 2024.

## **1.2 Research results**

### **1.2.1 Place of residence and living conditions of Roma and Egyptians in Nikšić**

In Nikšić, the following settlements were covered by the research: Brlja, Budo Tomović, Gvozdenice, Humci, the settlement under Trebjesa, Zverinjak and Nikšić (the core of the city). During the research, 173 households with a to-

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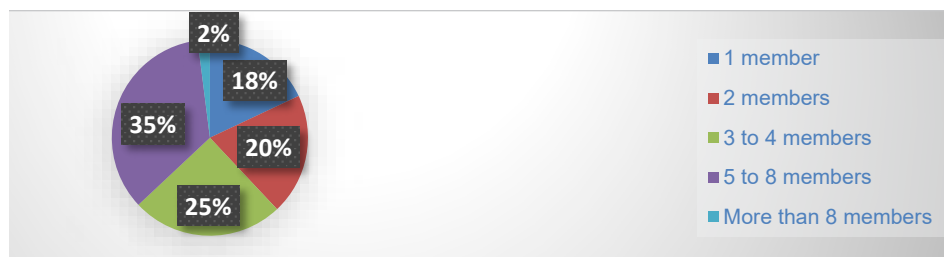
20 Census of the Population, Households and Dwellings in Montenegro in 2011. *Institute of Statistics – MONSTAT*, 2021, Podgorica, Montenegro.

21 "A household is any family or other community of persons who live together, regardless of whether all members are permanently in the place where the household is located or some of them stay for a long time in another place or another country, for work, education or any other reasons. Any person who lives alone in a place (single household) and does not have a household in another place or country is considered a household. A household is also considered a collective household, i.e. a household made up of persons living in institutions for the care of children and adults, in health institutions for the accommodation of incurable patients, monasteries, convents and other religious buildings" (Methodology for the preparation, organisation and implementation of the MONSTAT census, *Institute for Statistics – MONSTAT*, 2021: 11, Podgorica, Montenegro).



tal of 657 members were surveyed in these settlements, and they are: **Brlja**, 10 households, with a total of 31 members; **Budo Tomović**, nine households, with a total of 43 members; **Gvozdenice**, one household, with a total of four members; **Humci**, six households, with a total of 27 members; **the settlement under Trebjesa**, 131 households, with a total of 502 members; **Zverinjak**, 10 households, with a total of 36 members; **the core of the city**, six households, with a total of 14 members. The following chart presents the overall structure of the surveyed households in Nikšić.

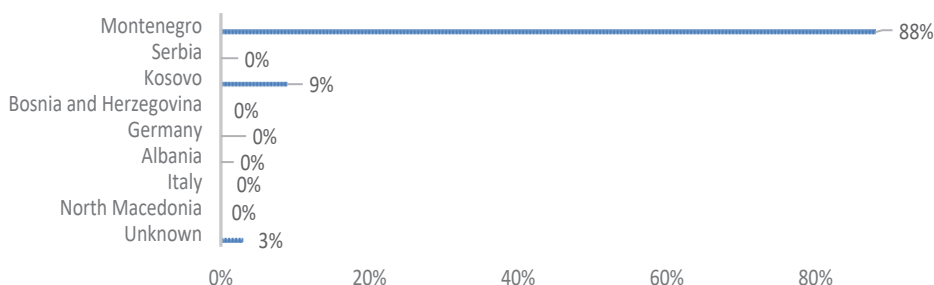
**Chart 1: Number of household members**



**Source:** Author's research.

As seen in the previous chart, most of the surveyed households living in Nikšić consist of five to eight members, whereas the fewest households (2%) consist of more than eight members. The following chart presents the origin of Roma and Egyptian households living in Nikšić.

**Chart 2: Place of origin**



**Source:** Author's research

As shown in the chart, 88% of the surveyed heads of households from Nikšić are of Montenegrin origin, while 9% of them are from Kosovo\*. The following chart presents the incomes of the households surveyed in Nikšić.

\* This designation is without prejudice to positions on status and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo Declaration of Independence.

**Chart 3: Incomes of households per month**



**Source:** Author's research

Of all the surveyed households in Nikšić, 74% have an income of less than 450<sup>22</sup> euros per month, 21% have an income of 450 to 814<sup>23</sup> euros, whereas 5% of the respondents have an income of more than 814 euros. The following chart presents the scope of rights from the Law on Social and Child Protection exercised by Roma and Egyptian households living in Nikšić.

**Chart 4: Beneficiaries of Social and Child Protection**



**Source:** Author's research.

***Financial Assistance for Individuals and Families is received by 27% of the households in Nikšić.***

Regarding the type of personal documents which they possess, the respondents answered as is presented in the following chart.

**Chart 5: Possession of personal documents**



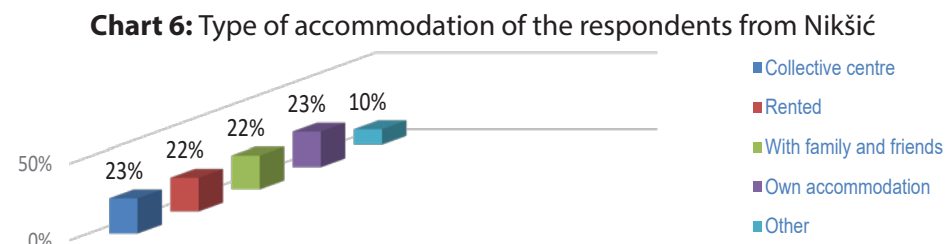
**Source:** Author's research

***In Nikšić, 20% of the heads of households do not possess a personal document.***

<sup>22</sup> The lowest earnings in Montenegro.

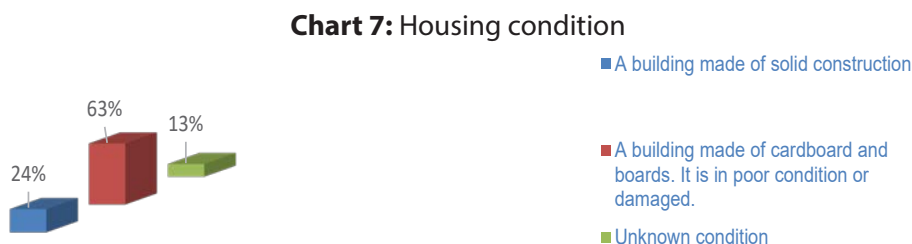
<sup>23</sup> Average earnings (Average earnings (table): Bureau of Statistics – MONSTAT, 2024, Podgorica Montenegro).

The following chart shows the type of household accommodation in Nikšić.



**Source:** Author's research

In Nikšić, 23% of the households included in this research have their own accommodation, whereas 23% of the households live in collective accommodation. The other households, i.e. 54% of them, do not have their own accommodation. The following chart shows the housing condition in Nikšić.



**Source:** Author's research

***There are 63% of Roma and Egyptian households living in inadequate accommodation in Nikšić.***

Seven per cent of the households declared that they do not have access to infrastructure.

***Eighty per cent of the heads of households declared that they would accept being relocated from the current settlement to another one, if necessary, whereas 20% would reject such an offer.***

### 1.2.2 Place of residence and living conditions of Roma and Egyptians in Kotor

In Kotor, the following settlements were included in the research: Lovanja, Trojica and Stari grad (Old Town). During the research, 39 households with a total of 185 household members were surveyed in these settlements. In the set-

tlement of **Lovanja**, 30 households with 140 members were surveyed; in the settlement of **Trojica**, eight households with 43 members were surveyed; and in the settlement of **Kotor Stari grad** (Kotor Old Town), one household with a total of two members was surveyed. The following chart presents the structure of the households surveyed in Kotor.

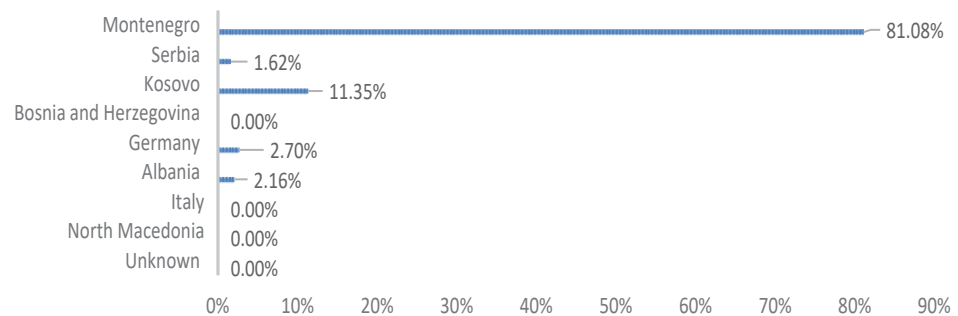
**Chart 1: Number of household members**



**Source:** Author's research.

Most households living in Kotor have five to eight members, while those with one member are least represented. The following chart presents the origin of the heads of households living in Kotor.

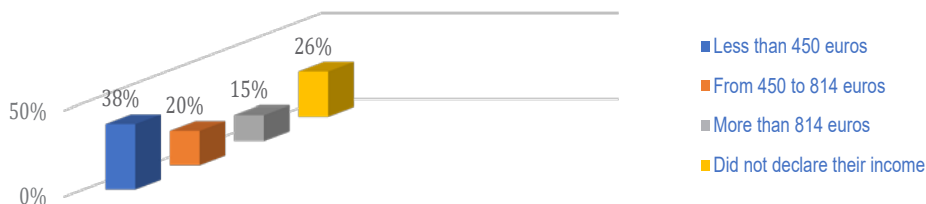
**Chart 2: Place of origin**



**Source:** Author's research

As seen in the chart, 81.08% of the surveyed heads of the households in Kotor are of Montenegrin origin, whereas 11.35% of them are from Kosovo. Households originating from Albania, Germany and Serbia are represented with a total of 6%. The following chart presents the income per month of the households surveyed in Kotor.

**Chart 3: Household income per month**



**Source:** Author's research

Fifteen per cent of the households have an income of more than 814 euros per month, whereas 38% of them have an income of less than 450 euros. Twenty per cent of the households have an income between 450 and 814 euros, whereas 26% of them did not want to declare their income. The following chart will show the scope of rights from the Law on Social and Child Protection that are exercised by Roma and Egyptians in Kotor.

**Chart 4: Beneficiaries of Social and Child Protection**

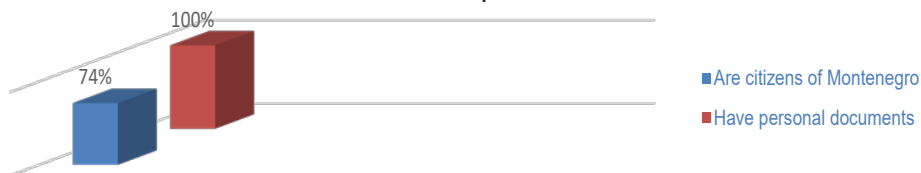


**Source:** Author's research

***Financial Assistance for Individuals and Families is received by only 3% of the households.***

The following chart shows data about personal documents.

**Chart 5: Possession of personal documents**



**Source:** Author's research

All heads of the households in Kotor have personal documents.

The following chart presents the type of accommodation of the households surveyed in Kotor.

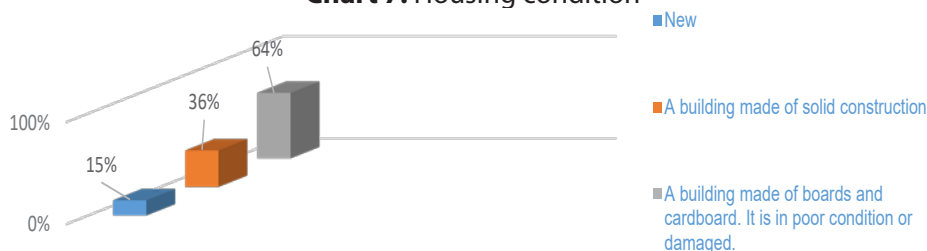
**Chart 6:** Type of accommodation of the respondents from Kotor



**Source:** Author's research

In Kotor, 25% of the households included in this research have their own accommodation, whereas 49% of them live in collective accommodation. The remaining households, i.e. 36% of them, do not have accommodation. In the following chart, we will present the housing condition in Kotor.

**Chart 7:** Housing condition



**Source:** Author's research

***Sixty-four per cent of the households live in inadequate accommodation in Kotor.***

The settlements are not provided with the public sewerage infrastructure, nor public lighting, they do not even have access to water and are illegally connected to the electricity grid. Fifteen per cent of the households are without any heating.

***Eighty-two per cent of the respondents said that they would accept being relocated from their current settlement to another one, if necessary, while 18% of them would refuse such an offer.***

### **1.2.3 Place of residence and living conditions of Roma and Egyptians in Budva**

In Budva, the settlements covered by the research are Lastva Grbaljska and Palestina. During the research, 55 households with a total of 200 members

were surveyed in these settlements. In the settlement of **Lastva Grbaljska**, five households were surveyed, with a total of 16 members, while in the settlement of **Palestina**, 50 households were surveyed, with a total of 184 members. The following chart shows the structure of the households surveyed in Budva.

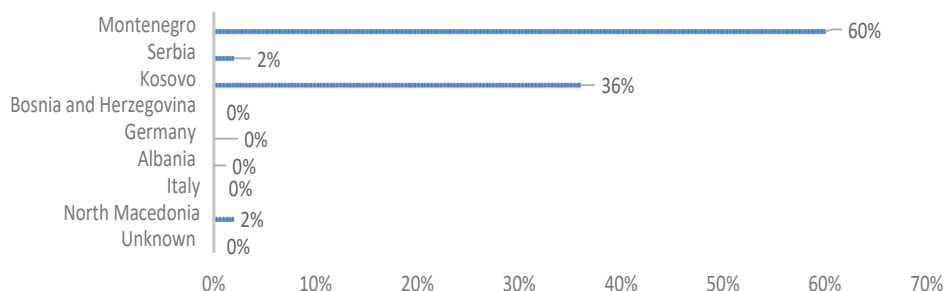
**Chart 1:** Number of household members



**Source:** Author's research

Most households living in Budva have three to four members. The following chart shows the origin of Roma households living in Budva.

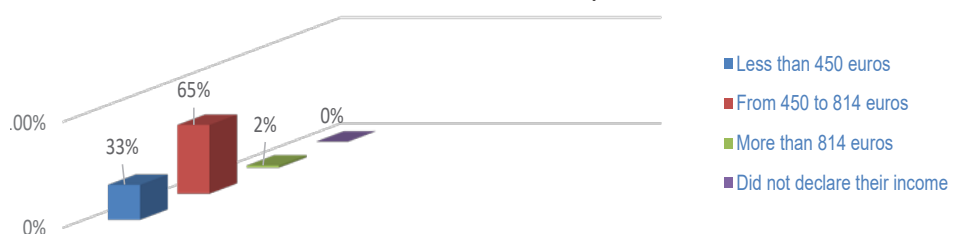
**Chart 2:** Place of origin



**Source:** Author's research

As seen in the chart, 60% of the surveyed households in Budva are from Montenegro, whereas 36% of the households are from Kosovo. The following chart presents the income of Roma households in Budva.

**Chart 3:** Household income per month



**Source:** Author's research

Of all the households surveyed, 33% have an income of less than 450 euros per month. The following chart presents the scope of rights from the Law on Social and Child Protection that are exercised by Roma and Egyptians in Budva.

**Chart 4:** Beneficiaries of Social and Child Protection



**Source:** Author's research

***Financial Assistance for Individuals and Families is received by 18% of the households.***

The following chart shows the possession of personal documents of the respondents from Budva.

**Chart 5:** Possession of personal documents



**Source:** Author's research

***In Budva 18% of the respondents do not possess personal documents.***

The following chart shows the type of accommodation of the families surveyed in Budva.

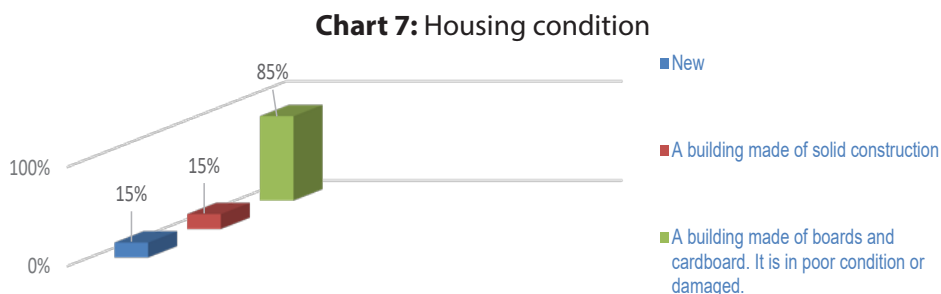
**Chart 6:** Type of accommodation of the respondents from Budva



**Source:** Author's research



In Budva, 7% of the households included in this research have their own accommodation, whereas 69% of them live in inadequate collective accommodation. Other households do not have their own accommodation. The following chart shows the housing condition in Budva.



**Source:** Author's research

***In Budva, 85% of Roma and Egyptian households live in inadequate accommodation, even though they all have access to electricity, water and public lighting. Eleven per cent of the households are without any heating.***

***Ninety-one per cent of the respondents declared that they would accept being relocated from their current settlement to another one, if necessary, whereas 9% of the respondents would reject such an offer.***

#### **1.2.4 Place of residence and living conditions of Roma and Egyptians in Herceg Novi**

The research included the following settlements in Herceg Novi: Bajkovi-na, Bijela, Drenovik, Đenovići, Igalo, Meljine, Zelenika, Kamenari and Herceg Novi. During the research, 50 households with a total of 203 household members were surveyed in these settlements. In the settlement of **Bajkovi-na**, two households were surveyed, with eight members; in the settlement of **Bijela**, two households with seven members were surveyed; in the settlement of **Drenovik**, 16 households with 82 members were surveyed; in the settlement of **Đenovići**, two households with 22 members were surveyed; in **Igalo**, two Roma families did not want to declare their socio-economic status; in **Meljine**, 17 households with a total of 50 members were surveyed; in the settlement of **Zelenika**, two households with 15 members were surveyed; in **Kamenari**, two households with five members were surveyed; in the town of **Herceg Novi**, five households with 12 members were surveyed.

The following chart shows the overall structure of the households surveyed in Herceg Novi.

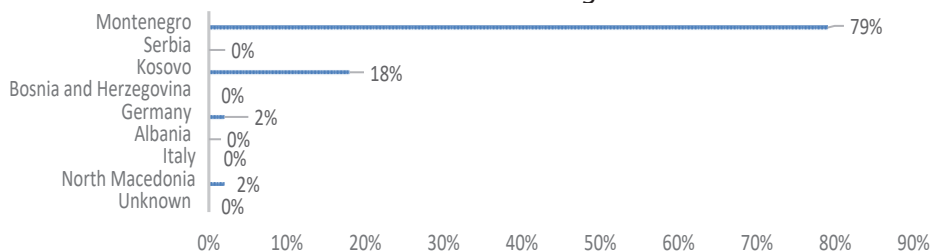
**Chart 1: Number of household members**



**Source:** Author's research

Most households living in Herceg Novi have five to eight members, while the fewest households have eight or more members. The following chart shows the origin of Roma households living in Herceg Novi.

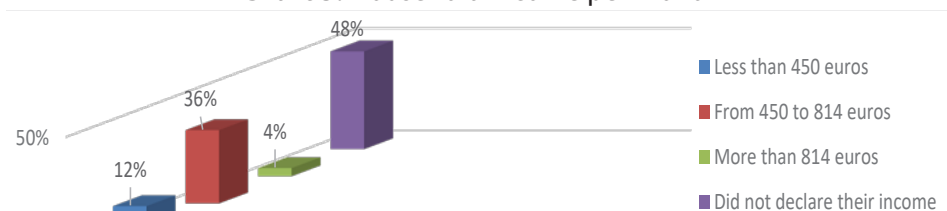
**Chart 2: Place of origin**



**Source:** Author's research

As seen in the chart, 79% of the surveyed households in Herceg Novi are of Montenegrin origin, whereas 18% of them are from Kosovo. The following chart shows the incomes of the households surveyed in Herceg Novi.

**Chart 3: Household income per month**

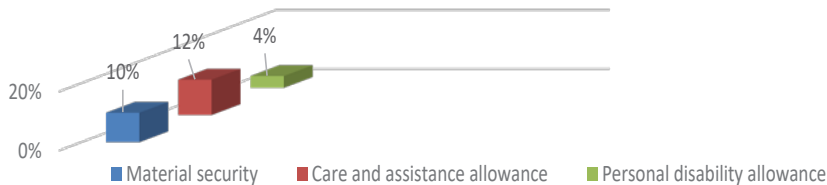


**Source:** Author's research

In Herceg Novi, 36% of Roma families have an income of more than 450 euros per month, whereas 48% did not want to declare their income, so they were

treated as unknown. Four per cent of the families have an income of more than 814 euros, whereas 12% of the households have an income of less than 450 euros. The following graph shows the scope of rights from the Law on Social and Child Protection that are exercised by Roma and Egyptians in Herceg Novi.

**Chart 4: Beneficiaries of Social and Child Protection**



**Source:** Author's research

***Financial Assistance for Individuals and Families is received by 10% of the households.***

The following chart shows data about personal documents.

**Chart 5: Possession of personal documents**

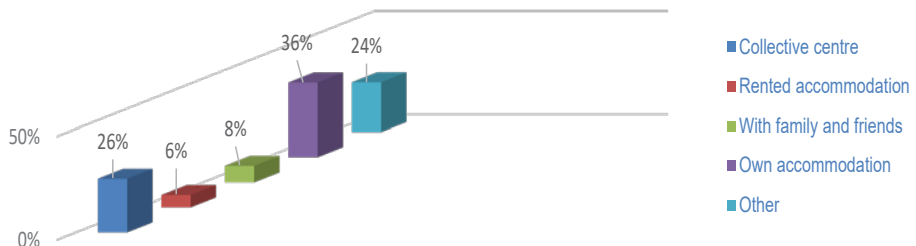


**Source:** Author's research

***Only 10% of the respondents from Herceg Novi do not have citizenship, and all the respondents possess personal documents.***

The following chart presents the type of accommodation of the households surveyed in Herceg Novi.

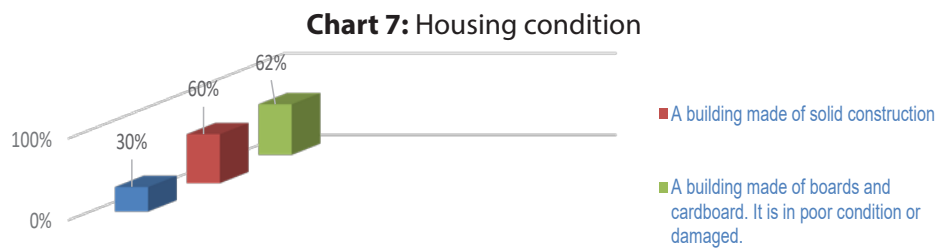
**Chart 6: Type of accommodation of the respondents from Herceg Novi**



**Source:** Author's research

***In Herceg Novi, 36% of the families included in this research have their own accommodation.***

The following chart shows the housing condition in Herceg Novi.



**Source:** Author’s research

***Sixty-two per cent of the households live in inadequate accommodation in Herceg Novi.***

The settlements are provided with the public sewerage infrastructure, and 42% of the families have access to the public sewerage system and 78% have access to water and electricity. Only in the settlement of Bajkovina do they not have access to water, and are (illegally) connected to the electricity grid. Four per cent of households are without any heating.

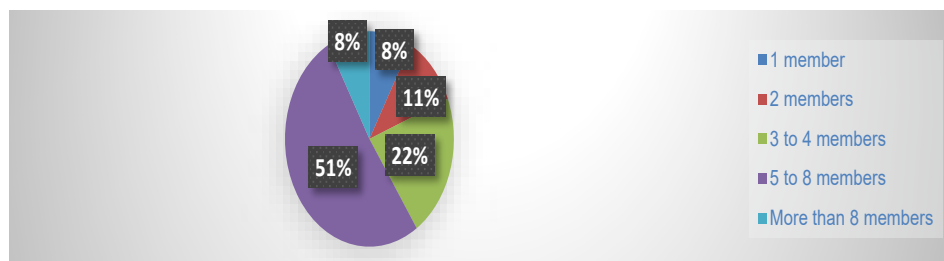
***Sixty-seven per cent of the respondents declared that they would accept being relocated from their current settlement to another one, if necessary, whereas 33% of them would refuse such an offer.***

**1.2.5 Place of residence and living conditions of Roma and Egyptians in Bar**

The research included the following settlements in Bar: the settlement under Volujica, Šušanj, Đuričine vode, Stari Bar (Old Bar) and Sokolana. During the research, 37 households with a total of 189 members were surveyed in these settlements. Until recently, the Roma settlement under Volujica was a refuge for immigrants from Kosovo. In a fire that happened on 15 February 2024, four barracks, where about 40 people lived, burned down. Four people lost their lives. Since then, the entire settlement has been evicted, and about 100 people have found refuge with family and friends in other cities in Montenegro. One part of the families temporarily moved to the settlement of Šušanj, near another Roma settlement, thus providing themselves shelter by staying in vans and cars. During this research, the aforementioned 15 families, as well as two

more families from the settlement of **Šušanj**, were surveyed, with a total of 87 household members; in the settlement of **Đuričine vode**, eight households with 41 members were surveyed; in the settlement of **Sokolana**, 12 households with 61 members were surveyed. The following chart shows the overall structure of the households surveyed in Bar.

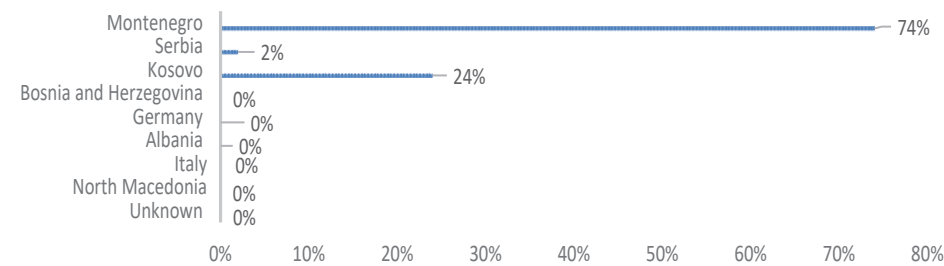
**Chart 1:** Number of household members



**Source:** Author's research

Most families living in Bar have five to eight family members, whereas the fewest families (8%) have one member. The following chart presents the origin of the households living in Bar.

**Chart 2:** Place of origin



**Source:** Author's research

As seen in the chart, 74% of the surveyed households from Bar are of Montenegrin origin, whereas 26% of the families are from Serbia or Kosovo. Since the questionnaire was used to determine the income of each household, of all the surveyed households, only 2.7% of Roma in Bar have an income of more than 450 euros. The following chart shows the scope of rights from the Law on Social and Child Protection exercised by Roma and Egyptians in Bar.

**Chart 3: Beneficiaries of Social and Child Protection**



**Source:** Author's research

***Financial Assistance for Individuals and Families is received by 37% of the respondents.***

The following chart shows the possession of personal documents of the respondents from Bar.

**Chart 4: Possession of personal documents**

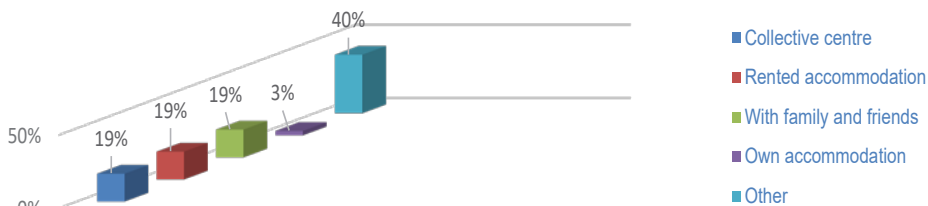


**Source:** Author's research

***In Bar, only 3% of the respondents do not possess a personal document.***

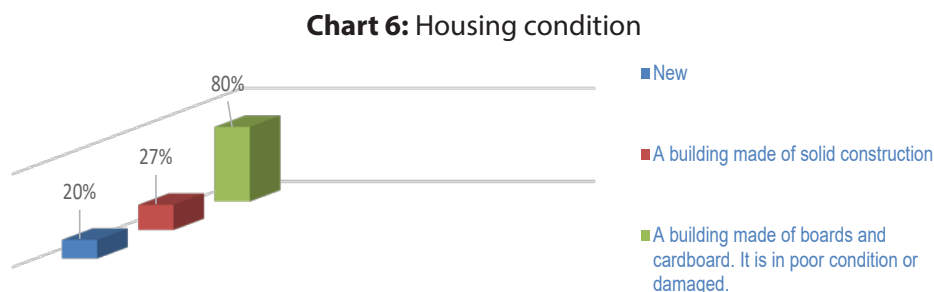
The following chart presents the type of accommodation of the households in Bar.

**Chart 5: Type of accommodation of the respondents from Bar**



**Source:** Author's research

In Bar, 3% of the households included in this research have their own accommodation, while 19% of the families live in collective accommodation. The other households do not have their own accommodation. The following chart shows the housing condition in Bar.



**Source:** Author's research

***In Bar, 80% of the households live in inadequate accommodation.***

In Bar, the Roma settlements lack public lighting, with only 8% of the households having access to water (public sewerage) and 16% of them having access to water from so-called water wells. Twenty-two per cent of the households are without any heating.

***Ninety-four per cent of the respondents declared that they would accept being relocated from their current settlement to another one, if necessary, whereas 6% of the respondents would refuse such an offer.***

### **1.2.6 Place of residence and living conditions of Roma and Egyptians in Ulcinj**

The research included the following settlements in the Municipality of Ulcinj: Bijela Gora, Đerana, Majka Tereza, Nova Mahalla, Pinješ, Sthoj and Totoši. During the research, 42 households with a total of 202 members were surveyed in these settlements. In the settlement of **Bijela Gora**, 15 households with 80 members were surveyed; in the settlement of **Đerana**, five households with 25 members were surveyed; four households with 20 members were surveyed in the settlement of **Majka Tereza**; in the settlement of **Nova Mahalla**, one household with three members was surveyed; 11 households with 45 members were surveyed in the settlement of **Pinješ**; in **Sthoj**, two households with 10 members were surveyed; in **Totoši**, four households with 19 members were surveyed. The following chart presents the overall structure of the households surveyed in Ulcinj.

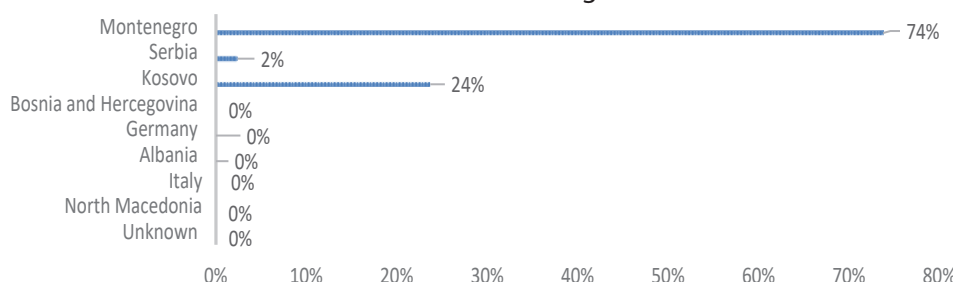
**Chart 1: Number of household members**



**Source:** Author's research

According to the previous chart, most families living in Ulcinj have five to eight family members. The following chart presents the origin of Roma families living in Ulcinj.

**Chart 2: Place of origin**



**Source:** Author's research

As seen in the chart, 74% of the surveyed households in Ulcinj are of Montenegrin origin, whereas 26% of the households are from Kosovo and Serbia. The following chart shows the income of the households surveyed in Ulcinj.

**Chart 3: Household income per month**



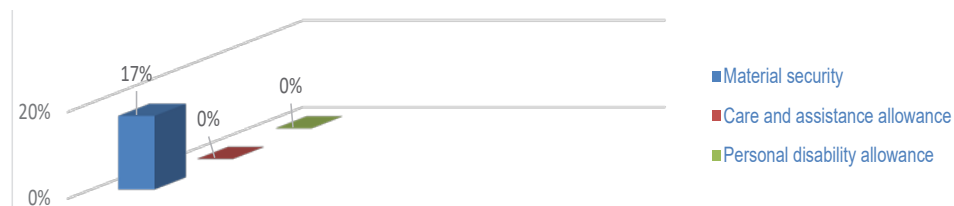
**Source:** Author's research

According to the previous chart, 55% of Roma and Egyptian households living in Ulcinj have a monthly income of less than 450 euros per month. The



following chart presents the scope of rights from the Law on Social and Child Protection exercised by Roma and Egyptians in Ulcinj.

**Chart 4: Beneficiaries of Social and Child Protection**

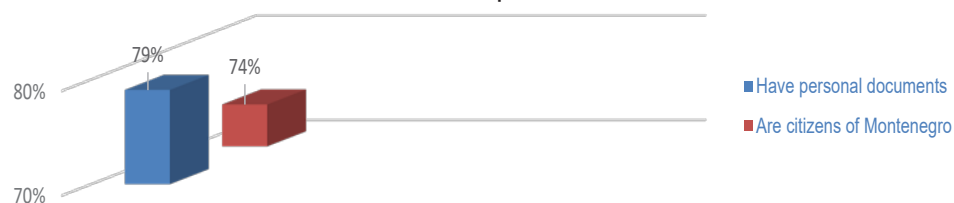


**Source:** Author's research

***Financial Assistance for Individuals and Families is received by 17% of the households.***

The following chart shows data about the possession of personal documents.

**Chart 5: Possession of personal documents**

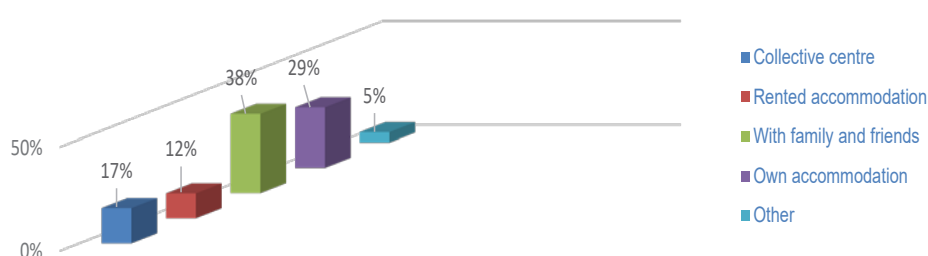


**Source:** Author's research

***In Ulcinj, 21% of the respondents do not possess a personal document.***

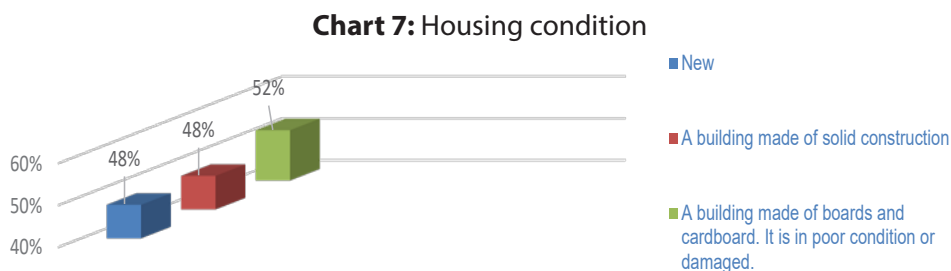
The following chart shows the type of accommodation of the families surveyed in Ulcinj.

**Chart 6: Type of accommodation of the respondents from Ulcinj**



**Source:** Author's research

Twenty-nine per cent of the Roma and Egyptian households in Ulcinj declared that they have their own accommodation, whereas 17% of the families live in collective accommodation. The other households (55% of them) do not have their own accommodation. The following chart shows the housing conditions.



**Source:** Author's research

***In Ulcinj, 52% of the Roma and Egyptian households live in inadequate accommodation.***

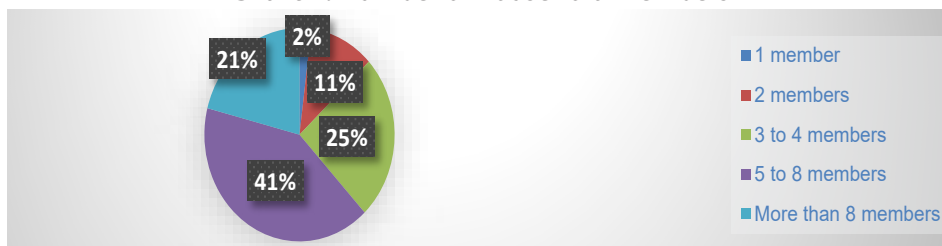
All the respondents in Ulcinj have access to electricity and water.

***Ninety-five per cent of the respondents declared that they would accept being relocated from their current settlement to another, if necessary, whereas 5% of the respondents would reject such an offer.***

### **1.2.7 Place of residence and living conditions of Roma and Egyptians in Berane**

The research included the following settlements in Berane: Ranč, Riversajd, Rudeš and Talum. During the research, 126 households with a total of 683 members were surveyed in these settlements. In the settlement of **Ranč**, three households with 14 members were surveyed; in the settlement of **Riversajd**, 52 households with 275 members were surveyed; in the settlement of **Rudeš**, 19 households with 88 members were surveyed; in the settlement of **Talum**, 52 households with 306 members were surveyed. The following chart presents the structure of the families surveyed in Berane.

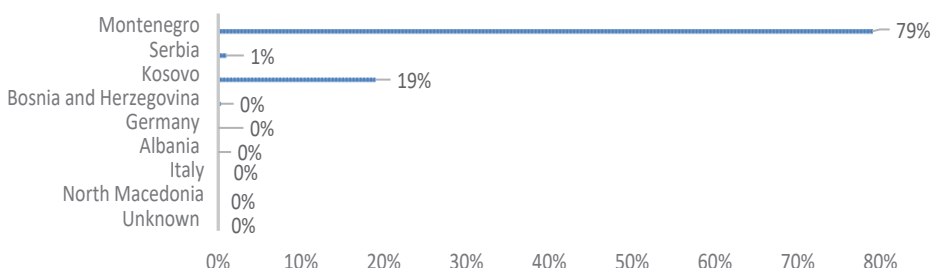
**Chart 1: Number of household members**



**Source:** Author's research

As seen in the previous chart, the largest number of households living in Berane have five to eight members. The following chart presents the origin of Roma households living in Berane.

**Chart 2: Place of origin**



**Source:** Author's research

According to the chart, 79% of surveyed households are of Montenegrin origin, whereas 19% of the households are from Kosovo. The number of others is negligible. The following chart presents the incomes of the households surveyed in Berane.

**Chart 3: Household income per month**



**Source:** Author's research

In Berane, 89% of respondents have an income below 450 euros per month. The following chart, will present the scope of rights from the Law on Social and

Child Protection that are used by Roma and Egyptians in Berane.

**Chart 4: Beneficiaries of Social and Child Protection**



**Source:** Author's research.

***Financial Assistance for Individuals and Families is received by 46% of the households.***

The following chart shows data about personal documents.

**Chart 5: Possession of personal documents**

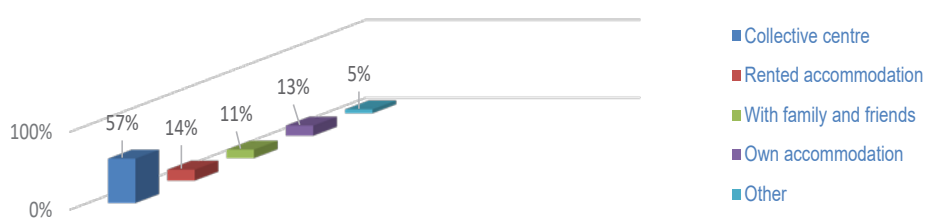


**Source:** Author's research

***In Berane, 99% of the heads of households possess personal documents.***

The following chart presents the type of accommodation of the households surveyed in Berane.

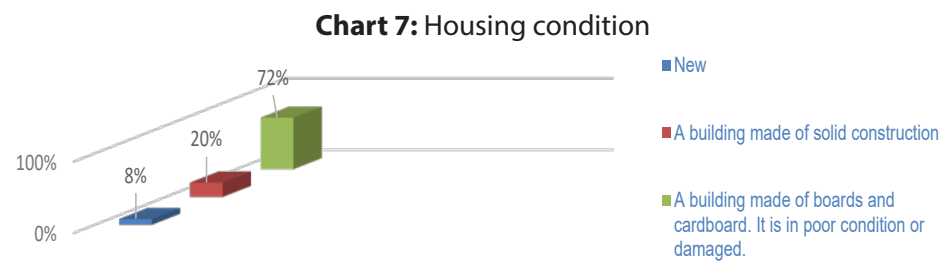
**Chart 6: Type of accommodation of the respondents from Berane**



**Source:** Author's research

In Berane, 13% of the households declared that they have their own accommodation, whereas 57% of the families live in collective accommodation. The

other households, i.e. 30% of them, do not have their own accommodation. The following chart shows their housing conditions.



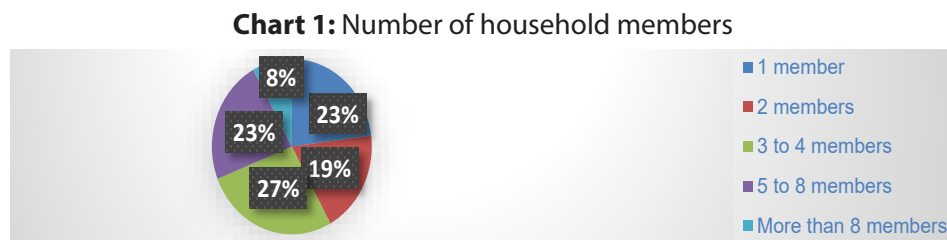
**Source:** Author's research

***In Berane, 72% of the households live in inadequate accommodation.***

***Ninety per cent of the respondents declared that they would accept being relocated from their current settlement to another, if necessary, whereas 20% would reject such an offer.***

### 1.2.8 Place of residence and living conditions of Roma and Egyptians in Bijelo Polje

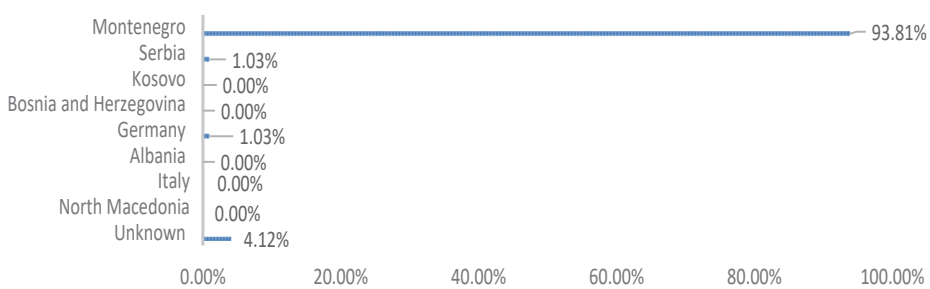
The following settlements in Bijelo Polje were included in the research: Rakonje and Strojtanica. During the research, 26 households with a total of 97 household members were surveyed in these settlements. In the settlement of **Rakonje**, 24 households with a total of 93 members were surveyed; two Roma households with four members were surveyed in the settlement of **Strojtanica**. This settlement is located on the right side of the main road to Prijepolje. According to the data collected in the field, 28 households with about 143 members of the Roma/Egyptian population live in this settlement. Only two families agreed to be interviewed, the others did not want to be interviewed, thus expressing their indignation at the previous attitude of the local and state authorities towards them. The following chart presents the structure of the families surveyed in Bijelo Polje.



**Source:** Author's research

As seen in the previous chart, most households living in Bijelo Polje have three to four members, while the fewest households have more than eight members. The following chart shows the origin of Roma households living in Bijelo Polje.

**Chart 2: Place of origin**



**Source:** Author's research

According to the chart, 93.81% of the surveyed households are of Montenegrin origin, whereas 2.06% of the households are from Serbia and Germany; 4.12% declared that they did not know the place of their origin. The following chart presents the incomes of the families surveyed in Bijelo Polje.

**Chart 3: Household income per month**



**Source:** Author's research

In Bijelo Polje, 69% of the respondents did not want to declare their income, only 8% of the families declared that they have an income of 450 euros or more per month. The following chart, will present the scope of rights from the Law on Social and Child Protection exercised by Roma and Egyptians in Bijelo Polje.

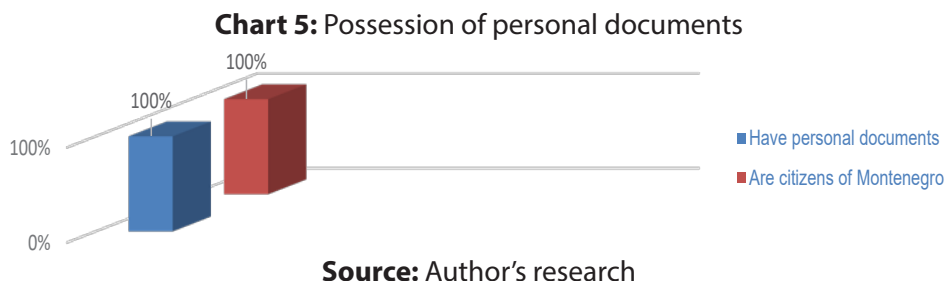
**Chart 4: Beneficiaries of Social and Child Protection**



**Source:** Author's research.

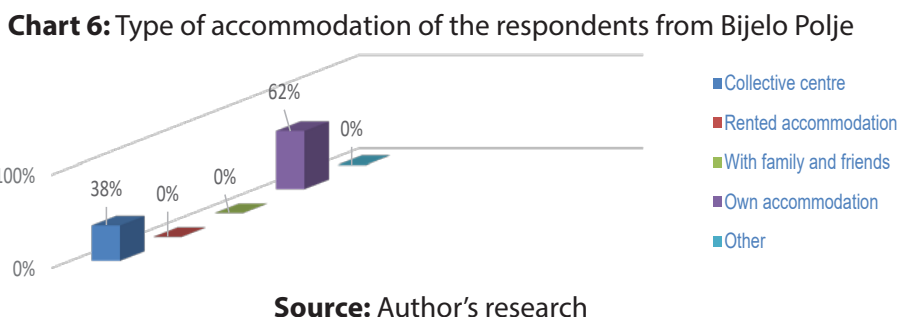
**Financial Assistance for Individuals and Families is received by 27% of the households.**

The following chart shows data about personal documents.

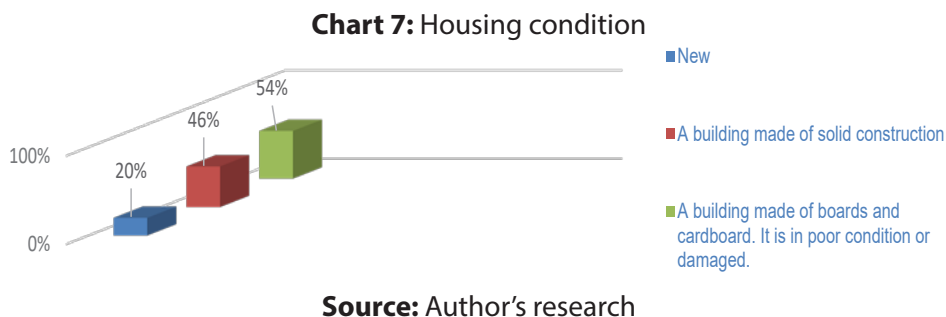


**All the respondents in Bijelo Polje have personal documents and the citizenship of Montenegro.**

The following chart presents the type of accommodation of the households surveyed in Bijelo Polje.



In Bijelo Polje, 62% of the households declared that they have their own accommodation, whereas 38% of the households live in collective accommodation. The following chart presents the housing conditions in Bijelo Polje.



***In Bijelo Polje, 54% of the households live in inadequate accommodation.***

Since the settlements are located along a main road, they are provided with public lighting infrastructure, most of them have access to water, and they are (albeit illegally) connected to the electricity grid. The families use wood for heating.

***Ninety-six per cent of the respondents declared that, if necessary, they would accept being relocated from their current settlement to another, while 4% would refuse such an offer.***

### 1.2.9 Summary of the research results

The territory of Montenegro – meaning the eight municipalities covered by this research – is obviously a place where a significant number of Roma and Egyptians have not resolved their housing issue yet. Furthermore, in comparison to those who have not resolved the issue of housing, there are a significantly larger number of families living in substandard housing units which do not even meet the minimum standards that would satisfy one of the basic existential issues. The research results are summarised in the tables below.

Not owning any accommodation	Inadequate accommodation
Nikšić 64% (111 households) Kotor 35% (14 households) Budva 24% (13 households) Herceg Novi 38% (19 households) Bar 78% (29 households) Ulcinj 54% (23 households) Berane 30% (38 households) Bijelo Polje 38% (10 households)	Nikšić 63% (109 households) Kotor 64% (25 households) Budva 85% (55 households) Herceg Novi 62% (31 households) Bar 80% (30 households) Ulcinj 52% (22 households) Berane 72% (91 households) Bijelo Polje 54% (14 households)
<b>257 households</b>	<b>377 households</b>

In addition to not having their own accommodation and living in informal housing units, the largest number of Roma and Egyptians in these municipalities live in households whose total income is below the minimum wage in Montenegro, which is shown in the table below.



### **Income below 450 euros per month**

Nikšić 66%, Kotor 38%, Budva 33%, Herceg Novi 12%, Bar 97%, Ulcinj 55%, Berane 89%, Bijelo Polje 93%.

Although the number of households with an income below 450 euros per month is as shown in the table above, fewer Roma and Egyptian households in these municipalities are in a state of social need as defined by the Law on Social and Child Protection, i.e. Financial Assistance for Individuals and Families is received by fewer households. In Nikšić, this figure is only 33% of them, in Kotor 3%, in Budva 18%, in Herceg Novi 10%, in Bar 37%, in Ulcinj 17%, in Berane 46% and in Bijelo Polje 37%. The reasons for not exercising this right are numerous, and they will not be addressed within the scope of this study.

Apart from the overall challenge of resolving the issue of housing, in these municipalities, a special challenge in the future will also be solution of the housing issue of Roma and Egyptians who do not possess personal documents. The percentage of respondents without personal documents was 11% of them in Nikšić, 18% in Budva, 3% in Bar, 21% in Ulcinj and 1% in Berane.

The largest number of respondents would accept being relocated from their current place of residence to another, especially if it would mean better living conditions. According to this, 86% would accept such an offer in Nikšić, 82% in Kotor, 91% in Budva, 67% in Herceg Novi, 90% in Berane, 94% in Bar, 95% in Ulcinj and 96% in Bijelo Polje.



# CIRCUMSTANCES AND POSSIBILITIES OF THE LIVING CONDITIONS OF ROMA AND EGYPTIANS FROM THE PERSPECTIVE OF THE MUNICIPALITIES AND RECOMMENDATIONS FOR SOLVING THE HOUSING ISSUES

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## 2.1 Nikšić

According to representatives of the municipality, the total number of households that are vulnerable in terms of housing conditions in Nikšić is about 120, which is nine households more than the number found to be without accommodation and 11 households more than the number found to be living in inadequate accommodation. In order to legalise the existing facilities, the representatives of the municipality believe that it is necessary to provide funds for about 40 accommodation units located in the following three settlements: the settlement under Trebjesa; Budo Tomović; and Brlja. According to their findings, only one household inhabited by Roma and Egyptians in these settlements has a legalised building, previously built as a solid construction. These findings from the municipality are almost identical to the previous findings of the research, which determined that 42 facilities, or 24%, in which Roma and Egyptians live are solid construction facilities.

As stated by the representatives of the municipality, the subject locations where it is necessary to legalise the buildings have no obstacles with regard to the planning documentation.

Should the funds for construction be approved, the Municipality of Nikšić **would create the complete project documentation for the construction of the facilities, allocate the land, assign it and pay for the construction equipment.**

Considering the requirements of the Municipality of Nikšić, the previous research findings and the sequence of steps that need to be taken, a recommended model for solving the housing issue of Roma and Egyptians in this municipality is shown in the following table.

<i>Municipality</i>	<i>Recommendations</i>	<i>Number</i>	<i>Model</i>	<i>Source of funding</i>
<i>Nikšić</i>	1. Assignment of the land; Creation of the complete project documentation; Payment of construction equipment	3	Assign three plots in the territory of the Municipality of Nikšić. Create three projects for the construction of three buildings for collective housing and audit all the projects. Pay for the construction equipment for three plots of land on which the three residential buildings will be built	The Municipality of Nikšić
	2. Construction of housing units	120	Build three residential buildings for collective housing with 120 accommodation units	Potential project
	3. Legalisation of the existing facilities	40	Legalise 40 solid construction facilities where Roma and Egyptians live	Potential project

In Nikšić, the interview was held with **Dejan Ivanović**, Secretary of the Secretariat for Culture, Sports, Youth and Social Policy.

## 2.2 Kotor

According to the representatives of the municipality, the total number of households that are vulnerable in terms of housing conditions in Kotor is 20, which is six households more than the number found to be without accommodation, but also five households fewer than the number found to be living in inadequate accommodation.

In order to legalise the existing facilities, the representatives of the municipality believe that it is necessary to provide funds for 10 households, which is close to the results of the research, as it was determined that 14 households live in solid construction facilities. As stated by the representatives of the municipality, the subject locations where it is necessary to legalise the buildings have no obstacles with regard to the planning documentation.

Should the funds for construction be approved, the Municipality of Kotor **would create the complete project documentation for the construction of the facilities, allocate the land, assign it and pay for the construction equipment.**

Considering the requirements of the Municipality of Kotor, as well as the previous research findings, the recommended number and model of solving the housing issue of Roma and Egyptians in this municipality is shown in the following table.

<i>Municipality</i>	<i>Recommendations</i>	<i>Number</i>	<i>Model</i>	<i>Source of funding</i>
<i>Kotor</i>	1. Assignment of the land; Creation of the complete project documentation; Payment of construction equipment.	1	Assign one plot in the territory of the Municipality of Kotor. Create one project for the construction of one building for collective housing and audit the projects. Pay for the construction equipment for a plot of land on which a residential building will be built	The Municipality of Kotor
	2. Construction of housing units	20	Build a residential building for collective housing with 20 accommodation units	Potential project
	3. Legalisation of the existing facilities	10	Legalise 10 solid construction facilities where Roma and Egyptians live	Potential project

In Kotor, the interview was held with **Nebojša Mandić**, Secretary of the Secretariat for Property and Legal Affairs, **Jelena Franović**, Secretary of the Secretariat for Urban Planning, Housing and Spatial Planning, and **Tatjana Kriještorac**, Secretary of the Secretariat for Culture, Sports and Social Activities.

## 2.3 Budva

According to the representatives of the municipality, the total number of households that are vulnerable in terms of housing conditions in Budva is 50, which is only one household fewer than those determined by the research to be living

in collective accommodation or without accommodation, but also three households more than those found to be living in inadequate accommodation.

It is not possible to legalise the existing facilities, since the existing solid construction buildings are located on private land, not on municipal or state land. In addition, the locations of the buildings are outside the scope of the planning documents of the Municipality of Budva, and one of the locations is in the highway corridor, which is another fact that makes the legalisation procedure more difficult.

Should the funds for construction be approved, the Municipality of Budva **would allocate the land, assign it and pay for the construction equipment.**

Considering the requirements of the Municipality of Budva, as well as the previous research findings, the recommended number and model of solving the housing issue of Roma and Egyptians in this municipality is shown in the following table.

<i>Municipality</i>	<i>Recommendations</i>	<i>Number</i>	<i>Model</i>	<i>Source of funding</i>
<i>Budva</i>	1. Assignment of the land; Payment of construction equipment.	1	Assign one plot in the territory of the Municipality of Budva. Pay for the construction equipment for a plot of land on which one residential building will be built	The Municipality of Budva
	2. Creation of the complete project documentation	1	Create one project for the construction of one building for collective housing and audit the projects.	Potential project
	3. Construction of housing units	50	Build a residential building for collective housing with 50 accommodation units	Potential project

In Budva, the interview was held with **Nevenka Božović Jovović**, Chief Administrator of the Municipality of Budva.

## 2.4 Herceg Novi

According to the representatives of the municipality, the total number of households that are vulnerable in terms of housing conditions in Herceg Novi is 25, which is six more households than those found to be without accommodation, but also six households fewer than those found to be living in inadequate accommodation.

In order to legalise the existing facilities, the representatives of the municipality believe that it is necessary to provide funds for 10 households, which is eight households fewer than the results of the research showed, since it was determined that 18 households live in solid construction facilities.

The absence of the necessary planning documents represents a current obstacle for the legalisation of the existing solid construction facilities in Herceg Novi. The Municipality of Herceg Novi does not have a spatial urban plan, but it is expected that one will be adopted by the end of 2024.

Should the funds for construction be approved, the Municipality of Herceg Novi **would prepare the complete project documentation for the construction of facilities, allocate the land, assign it and pay for the construction equipment.**

Considering the requirements of the Municipality of Herceg Novi, as well as the previous research findings, a recommended number and model of solving the housing issue of Roma and Egyptians in this municipality is shown in the following table.

<i>Municipality</i>	<i>Recommendations</i>	<i>Number</i>	<i>Model</i>	<i>Source of funding</i>
<i>Herceg Novi</i>	1. Assignment of the land; Creation of the complete project documentation; Payment of construction equipment.	1	Assign one plot in the territory of the municipality of Herceg Novi. Create one project for the construction of one building for collective housing and audit the projects. Pay for the construction equipment for a plot of land on which a residential building will be built.	The Municipality of Herceg Novi

	2. Construction of housing units	25	Build a residential building for collective housing with 25 accommodation units	Potential project
	3. Legalisation of the existing facilities	10	Legalise 10 solid construction facilities where Roma and Egyptians live	Potential project

In Herceg Novi, the interview was held with **Vesna Samardžić**, Secretary of the Secretariat for Local Self-Government and **Ranka Šubarić**, Advisor for Social and Child Protection.

## 2.5 Bar

According to the representatives of the municipality, the total number of households that are vulnerable in terms of housing conditions in Bar is 35, which is equal to the number of households without their own accommodation as shown by the research and is five households more than those living in inadequate accommodation.

With regard to the legalisation of the existing solid construction buildings, the representatives from the municipalities are not familiar with the existence of solid construction buildings where Roma and Egyptians live, and which could be legalised.

Should the funds for construction be approved, the Municipality of Bar **would allocate, assign and prepare the land, after consultation with the Government of Montenegro**. The Municipality of Bar expresses the need for consultations with the Government of Montenegro regarding the assignment of plots, due to their expectation of numerous challenges in terms of allocating the plots to Roma and Egyptians in Bar. The challenges are reflected in the expected opposition by the local population during the allocation of potential plots intended for construction.

Considering the requirements of the Municipality of Bar, the previous research findings and the sequence of steps that need to be taken, the recommended number and model for solving the housing issue of Roma and Egyptians in this municipality is shown in the following table.

<i>Municipality</i>	<i>Recommendations</i>	<i>Number</i>	<i>Model</i>	<i>Source of funding</i>
<i>Bar</i>	1. Assignment of the land; Payment of construction equipment.	1	Assign one plot in the territory of the Municipality of Bar. Pay for the construction equipment for a plot of land on which a residential building will be built.	The Municipality of Bar
	2. Creation of the complete project documentation	1	Create one project for the construction of one building for collective housing and audit the projects.	Potential project
	3. Construction of housing units	35	Build a residential building for collective housing with 35 accommodation units	Potential project

In Bar, the interview was held with **Tanja Spičanović**, Vice-President of the Municipality of Bar, **Svetlana Gažević**, Secretary of the Secretariat for Local Self-Government, **Branko Orlandić**, Secretary of the Secretariat for Urbanism and Spatial Planning, and **Kraja Naser**, Independent Advisor for Minority Issues and Freedoms.

## 2.6 Ulcinj

The total number of Roma and Egyptian households in Ulcinj that are vulnerable in terms of housing conditions is 23, as determined by the research. However, the representatives of the Secretariat for Communal and Housing Affairs do not possess such information, nor any information about the number of Roma and Egyptians living in the territory of the Municipality of Ulcinj who have problems regarding housing conditions. In addition, they are not familiar with the situation that in this municipality there are buildings inhabited by Roma and Egyptians which need to be legalised.

During the interview with the representatives of the Secretariat, they also declared that, in addition to having no information, they also do not have the authority to propose anything regarding the municipality's activities in this field. After the interview with the representatives of the Secretariat, a conversation was also held with the President of the Municipality of Ulcinj, Genci Nimanbegu, who had been in that position for only 10 days. He informed us that the Municipality of Ulcinj currently did not have the personnel or other potential to be a partner in such a project and that this was the only reason why they were unable



to realise a potential project that would permanently solve the housing issue of Roma and Egyptians within their territory of their municipality.

Considering the briefly described position of the officials of the Municipality of Ulcinj, as well as the previous findings of the research in connection with the 23 households that do not have their own accommodation, it is still necessary to solve the housing issue for these households. Therefore, the sequence of steps that need to be taken and a recommended model for solving the housing issue of Roma and Egyptians in this municipality is shown in the following table.

<i>Municipality</i>	<i>Recommendations</i>	<i>Number</i>	<i>Model</i>	<i>Source of funding</i>
<i>Ulcinj</i>	1. Assignment of the land; Payment of construction equipment.	1	The Government of Montenegro	The Government of Montenegro (approval not given)
	2. Creation of the complete project documentation	1	Create one project for the construction of one building for collective housing and audit the projects.	Potential project
	3. Construction of housing units	23	Build a residential building for collective housing with 23 accommodation units	Potential project

In Ulcinj, the interview was held with **Genci Nimanbegu**, President of the Municipality of Ulcinj, and before that, with **Leart Taipi**, Secretary of the Secretariat for Communal and Housing Activities, **Manush Halili**, Independent Adviser in the Secretariat, and **Ardian Zatie**, a person engaged on a short-term contract in the municipality.

## **2.7 Berane**

According to the representatives of the municipality, the total number of households that are vulnerable in terms of housing conditions in Berane is 110, which is 10 households fewer than number found to be without accommodation. There is no interest in the legalisation of the existing facilities because the representatives of the municipality believe that, regardless of the fact that certain facilities could be legalised, they are not adequate for housing,

and therefore they believe that the construction of new housing facilities is the best model for solving their housing issue.

Should the funds for construction be approved, the Municipality of Berane **would allocate the land, assign it and pay for the construction equipment.**

Considering the requirements of the Municipality of Berane, as well as the previous research findings, the recommended number and model for solving the housing issue of Roma and Egyptians in this municipality is shown in the following table.

<i>Municipality</i>	<i>Recommendations</i>	<i>Number</i>	<i>Model</i>	<i>Source of funding</i>
<i>Berane</i>	1. Assignment of the land; Payment of construction equipment.	1	Assign a plot in the territory of the Municipality of Berane. Pay for the construction equipment for a plot of land on which a building/buildings will be built.	The Municipality of Berane
	2. Creation of the complete project documentation		Create a project for the construction of two buildings for collective housing and audit the projects.	Potential project
	3. Construction of housing units	110	Build two residential buildings for collective housing with 110 accommodation units	Potential project

In the Municipality of Berane, the interview was conducted with **Miloš Raković**, Secretary of the Secretariat for General Administration and Social Activities, and **Hana Međedović**, Independent Advisor for Improving the Position of Vulnerable Groups.

## **2.8 Bijelo Polje**

According to the representatives of the municipality, the total number of households that are vulnerable in terms of housing conditions in Bijelo Polje is 58, which is significantly more than the results of the research showed. After becoming acquainted with the research results, the municipality representatives stated that in the location of Nedakusi, which is not covered by the research, five Roma and Egyptian households in need of solving their housing issue live in buildings made of boards and cardboard. In the settlement of Rakonje, they believe that it is necessary to solve the housing issue for everyone, i.e. for 25 households, regard-

less of the fact that some households in that settlement have solid construction buildings, since it is not possible to legalise them on the subject location. Regarding the settlement of Strojtanica, where only two households were included in the survey, they believe that it is necessary to solve the issue of housing for all the households from the settlement, i.e. for 28 of them. Based on the findings of the municipality representatives, in the territory of the Municipality of Bijelo Polje, only one of the facilities where Roma and Egyptians live has been legalised, while the others cannot be legalised due to the existing locations of accommodation.

Should the funds for construction be approved, the Municipality of Bijelo Polje **would allocate the land, assign it and pay for the construction equipment.**

Considering the requirements of the Municipality of Bijelo Polje, the previous research findings, as well as the findings of the representatives of the municipality, a recommended model of solving the housing issue of Roma and Egyptians in this municipality is shown in the following table.

<i>Municipality</i>	<i>Recommendations</i>	<i>Number</i>	<i>Model</i>	<i>Source of funding</i>
<i>Bijelo Polje</i>	1. Assignment of the land; Payment of construction equipment.	1	Assign one plot in the territory of the Municipality of Bijelo Polje. Pay for the construction equipment for a plot of land on which a residential building will be built.	The Municipality of Bijelo Polje
	2. Creation of the complete project documentation	1	Create one project for the construction of a building for collective housing and audit the projects	Potential project
	3. Construction of housing units	58	Build a residential building for collective housing with 58 accommodation units	Potential project

In the Municipality of Bijelo Polje, the interview was conducted with **Haris Mlajić**, Secretary of the Secretariat for Local Self-Government, **Miloš Kljajević**, Head of the Department for Human and Minority Rights in the Municipality, and **Vladimir Luković**, an employee of the Office for Roma and Egyptians of the Municipality of Bijelo Polje.

## **3.1 Assessment of the legal framework**

The National Housing Strategy for the period 2011–2020<sup>24</sup> created the basic principles for defining the directions of the further development of the housing sector in Montenegro, whereas the responsibilities of both the state and local self-government units in Montenegro were specified by the adoption of the Law on Social Housing<sup>25</sup> and by the Social Housing Programme 2017–2021.<sup>26</sup> Through these mechanisms, social housing is connected to social or housing policy, with an emphasis on cohesion and inclusion policies.

The Law on Social Housing, as an umbrella document, defines social housing as “the housing of a specific standard, provided to individuals or households, who are not able to solve the problem of housing due to social, economic or other reasons”<sup>27</sup> in Montenegro. Under this law, “the right to social housing can be exercised by natural persons who do not own an apartment or other housing unit, or persons whose housing unit is not of an adequate standard and who cannot provide a housing unit from the income they earn. The right can be exercised by a Montenegrin citizen with residence within the territory of Montenegro, if he/she fulfils the conditions set forth by this Law, and it can also be exercised by a foreign citizen and person without citizenship, whose status is regulated according to this Law or an international agreement.”<sup>28</sup>

It is defined by this law that Roma and Egyptians, among others, have priority in receiving social housing, as well as “displaced persons, internally displaced persons from Kosovo who reside in Montenegro, foreigners with permanent residence or temporary stay, whose status of displaced or internally displaced person has been acknowledged”.<sup>29</sup> As defined by this law, a family household

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24 National Housing Strategy of Montenegro for the period 2011–2020, *Ministry of Sustainable Development and Tourism*, 2011, Podgorica, Montenegro.

25 Law on Social Housing, “*Official Gazette of the Republic of Montenegro*”, No. 35/2013.

26 Social Housing Programme, *Ministry of Sustainable Development and Tourism*, 2017, Podgorica, Montenegro.

27 Ibid.

28 Ibid.

29 Ibid (Article 4).

consists of all the members who live with the head of the household in that household, namely: “a spouse or person who lives in a common-law relationship with the head of the household, children born within marriage or out of marriage, adopted children or stepchildren and other individuals who are to be maintained by the head of the household or his/her spouse”.<sup>30</sup>

Regarding the provision of funds for the purpose of social housing, it is also defined by this law that, for this purpose, the state can provide funds from its own sources, i.e. the State Budget, but that funds can also be provided through, among other things, donations, and that the criteria for their spending are determined by the regulations of the government or local self-government units.<sup>31</sup> The manner for providing this type of housing can be different, including the construction of residential buildings, the allocation of land for the construction of such buildings, the allocation of construction materials, and the provision of subsidies for social housing, in accordance with the law.<sup>32</sup> The law also defines the leasing procedure and the method of allocating such housing units, but it also defines the impossibility of purchasing, inheriting, leasing and requisitioning such housing units.<sup>33</sup>

In 2018, the Government of Montenegro adopted the Regulation on the Method and Criteria for Using the Funds For Social Housing in accordance with Article 10 of the mentioned law, by which it was defined that:

“Funds for the development of social housing projects of interest to the state are distributed if:

- the project has been determined by the social housing programme;
- the social housing programme has determined the need for the provision of social housing;
- the financial resources needed for the realisation of the project have been provided;
- the participation of the local self-government unit in financing has been ensured;
- the priority target group and the number of beneficiaries of the social housing project have been determined by the social housing programme.

Funds for the development of social housing projects, for which there is a need in the local self-government unit, are distributed if:

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<sup>30</sup> Ibid (Article 9).

<sup>31</sup> Ibid (Article 10).

<sup>32</sup> Ibid (Article 11).

<sup>33</sup> Ibid (Article 16).

- the project has been determined by the local social housing programme;
- the need for the provision of social housing has been determined by the local social housing programme;
- the priority target group and the number of beneficiaries of the social housing project have been determined by the local social housing programme;
- the financial resources necessary for the realisation of the project have been provided.”<sup>34</sup>

As it is a standardised obligation of local self-governments, according to Article 6 of the Law on Social Housing, to adopt the Local Social Housing Programme for a period of one year, all the local units, with the exception of Budva, have adopted it at least once so far. Some of the municipalities have fully established the practice, so Nikšić and Kotor have already received the necessary approval from the Ministry of Spatial Planning, Urbanism and State Property to adopt this plan for 2024, and some of the municipalities are preparing new Local Programmes.

The target groups, among which are members of the Roma and Egyptian populations, are defined by the local programmes, but none of the local self-governments have dealt with the problem to the level of need expressed in the research from the first part of the paper, although each local administration, during the interviews, expressed needs similar to the data obtained by the research.

Local self-governments have also established the practice of making decisions on exercising the right to social housing in accordance with the previously adopted programmes. These decisions define the target groups, as well as the criteria according to which a housing issue can be solved for someone who is in need of solving the housing issue.

It is important to note that both programmes and decisions are always subject to changes, which are made within the regular parliamentary procedure in local parliaments, and in accordance with new circumstances. Such a manner creates a prerequisite for harmonising the new programmes and decisions with the eventual realisation of a project that would permanently solve the issue of housing of Roma and Egyptians on the territories of these subject municipalities.

***All the abovementioned gives us the basis to come to the conclusion that the existing legal framework in Montenegro provides the opportunity and is sufficient for the realisation and implementation of a potential project for the purpose of permanently solving the housing issue of Roma and Egyptians in all eight municipalities.***

<sup>34</sup> Regulation on the Method and Criteria for Using the Funds for Social Housing (Article 2), 2018, Government of Montenegro, Podgorica, Montenegro.

# IV RECOMMENDATIONS

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## ***4.1 Recommendations for solving the issue of housing of Roma and Egyptian people in the suggested eight municipalities***

The aim of this study is to contribute to the termination of long-term unfavorable conditions regarding the housing of Roma and Egyptian people in the proposed eight municipalities in Montenegro. In this respect, the study will present, within these recommendations, the **possibility of supporting the legalisation of existing housing facilities** in which Roma and Egyptian people reside in these municipalities. It will also explore the potential for **providing support through the necessary funds to build new housing facilities**. The information has been gathered with due respect for the rights of all parties involved in the process.

1. The following activities have been carried out to gather complete information about the possibilities of supporting the legalisation of existing housing facilities and constructing additional ones: the number of housing facilities in each settlement within these municipalities has been recorded; the number of housing facilities eligible for legalisation has been documented; the feasibility of legalising existing housing facilities has been established; the number of Roma and Egyptian households in need of new housing facilities has been noted; and the demographic and socio-economic characteristics of Roma and Egyptian people in all eight municipalities have been presented.

Summarising the above, the following recommendations present the possibility of providing support to the municipalities where it is possible to legalise existing housing facilities, as well as the possibility of supporting the construction of new housing facilities.

**Recommendation 1:** It is necessary to legalise the existing housing units and build new housing units according to the proposed models.

## 1.1 Proposal for legalisation

<i>Municipality</i>	<i>Number of facilities</i>	<i>Estimated area per facility (m<sup>2</sup>)<sup>35</sup></i>	<i>Total m<sup>2</sup> for legalisation</i>	<i>Number of persons as a target group<sup>36</sup></i>	<i>The cost of legalisation costs<sup>37</sup> per m<sup>2</sup> (€)</i>	<i>The price of legalisation of facilities</i>	<i>The price of other costs for legalisation per facility<sup>38</sup></i>	<i>Total other costs for all facilities</i>	<i>Total price for legalisation (of facility plus other costs)</i>
<i>Nikšić</i>	30	92	2,760	114	30.00	82,800	500	15,000	97,800
<i>Kotor</i>	10	84	840	47	34.23	28,753	500	5,000	33,753.20
<i>Herceg Novi</i>	10	116	1,160	40	7.60	8,816	500	5,000	13,816.00
<i>In total</i>	<b>50</b>		<b>4,760</b>	<b>201</b>				<b>25,000</b>	<b>145,369.20</b>

35 The estimated area is the average area of one's own facility from the research.

36 The number of persons who need legalisation is a percentage of the total number of persons included in the survey.

37 The price is expressed as the information was provided by the local self-governments and it is the estimated value with discounts defined by the laws.

38 In accordance with the provisions of Article 156 of the Law on Spatial Planning and Construction of Buildings, the necessary documentation for conducting the legalisation procedure is: a report on the survey of the state of the illegal facility made by a licensed geodetic organisation certified by the Cadastre; photographs of all façades of the illegal facility in jpeg format with a minimum resolution of 2 megapixels; the report of the company from Article 124 of this law on the existence of the illegal facility on the ortho-photograph from Article 155 of this law and the compliance of the illegal facility with the basic urban parameters and/or guidelines of the valid planning document and the auditor's statement that the illegal facility was built in accordance with the basic urban parameters and/or guidelines of the valid planning document; proof of the recording of the facility's existence in the cadastral records, i.e. an extract from the real estate cadastre or other appropriate real estate records.



## 1.2 Proposal for the construction of residential units

Municipality	Required number and structure of housing units	Number of persons as a target group <sup>38</sup>	Per housing unit (m <sup>2</sup> ) <sup>39</sup>	Total required for construction (m <sup>2</sup> )	Construction price <sup>40</sup> per m <sup>2</sup> (€)	Required funds for construction (potential project) (€)	Arrangements of the land and behind the project	Price per m <sup>2</sup> of land development and project development (€)	Participation by the municipality (stated possibility) (€)	Required funds (potential project) (€)
Niškić	46 one-room		30	1,380			Land arrangements <sup>41</sup>	145	778,650	0
	30 two-room		45	1,350			Project development <sup>42</sup>	25	134,250	0
	44 three-room		60	2,640			Other expenses <sup>43</sup>	72	0	386,640
<b>In total</b>	<b>120</b>	<b>453</b>		<b>5,370</b>	<b>716</b>	<b>3,844,920</b>			<b>919,900</b>	<b>386,640</b>
Kotor	5 one-room		30	150			Land arrangements	324	315,900	0
	5 two-room		45	225			Project development	25	24,375	0
	10 three-room		60	600			Other expenses	127	0	175,387
<b>In total</b>	<b>20</b>	<b>94</b>		<b>975</b>	<b>1,381</b>	<b>1,346,475</b>			<b>340,275</b>	<b>175,387</b>
Budva	17 one-room		30	510			Land arrangements	324	724,140	0
	17 two-room		45	765			Project development	25	0	55,875
	16 three-room		60	960			Other expenses	127	0	283,845
<b>In total</b>	<b>50</b>	<b>181</b>		<b>2,235</b>	<b>1,381</b>	<b>3,086,535</b>			<b>724,140</b>	<b>339,720</b>
Herceg Novi	8 one-room		30	240			Land arrangements	324	379,080	0
	6 two-room		4	270			Project development	25	29,250	0
	11 three-room		60	660			Other expenses	127	0	148,590
<b>In total</b>	<b>25</b>	<b>128</b>		<b>1,170</b>	<b>1,381</b>	<b>1,615,770</b>			<b>408,330</b>	<b>148,590</b>
Bar	7 one-room		30	210			Land arrangements	324	529,920	0
	8 two-room		45	360			Project development	25	0	45,750
	21 three-room		60	1260			Other expenses	127	0	232,410
<b>In total</b>	<b>36</b>	<b>183</b>		<b>1,830</b>	<b>1,381</b>	<b>2,527,230</b>			<b>529,920</b>	<b>278,160</b>
Ulcinj	4 one-room		30	120			Land arrangements	324	369,360	0
	8 two-room		45	360			Project development	25	0	280,500
	11 three-room		60	660			Other expenses	127	0	144,780
<b>In total</b>	<b>23</b>	<b>111</b>		<b>1,140</b>	<b>1,381</b>	<b>1,574,340</b>			<b>369,360<sup>44</sup></b>	<b>425,280</b>
Berane	14 one-room		30	420			Land arrangements	210	1,209,600	0
	28 two-room		45	1,260			Project development	25	0	144,000
	68 three-room		60	4,080			Other expenses	155	0	892,800
<b>In total</b>	<b>110</b>	<b>596</b>		<b>5,760</b>	<b>810</b>	<b>4,665,600</b>			<b>1,209,600</b>	<b>1,036,800</b>
Bijelo Polje	24 one-room		30	720			Land arrangements	210	529,200	0
	16 two-room		45	720			Project development	25	0	63,000
	18 three-room		60	1,080			Other expenses	155	0	390,600
<b>In total</b>	<b>58</b>	<b>216</b>		<b>2,520</b>	<b>810</b>	<b>2,941,200</b>			<b>529,200</b>	<b>453,600</b>
<b>In total</b>	<b>442</b>	<b>1,962</b>		<b>21,000</b>		<b>20,702,070</b>			<b>5,030,725</b>	<b>3,244,177</b>

Project – required for construction	Montenegro – participation – construction
23,244,177	5,030,725

2. To gather complete information about the potential structure for managing the project, as well as the necessary funds to build the structure, the following activities have been conducted: the needs of each municipality that was the subject of the study have been recorded; the possibilities and authorities of the municipalities and responsible ministries have been documented; previous experiences related to the realisation of similar projects by both the municipalities and the responsible ministries have been noted; and the personnel potential, locations, and related factors of both the municipalities and the responsible ministries have been assessed.

In accordance with the roles that institutions can have in realisation of this potential project, the following was recommended:

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- 39 The number of people who need accommodation is expressed as a percentage of the total number of people included in the survey.
  - 40 The structure of housing units is expressed as follows (1 or 2 members; one-room; 3 or 4 members; two-room; 5 or more members; three-room). The number of required units was determined based on the structure of the surveyed households.
  - 41 The price of construction works includes “all construction works and profits of investors per 1 m<sup>2</sup> of useful floor area, craft-finishing and installation works on buildings and dwellings”, and does not include “land acquisition, demolition, preparation detailed urban plans and projects, field testing, repair works, arrangement of environment around the building, communal equipping of land, etc.” (MONSTAT, 2024).
  - 42 “The price of construction land development consists of the following elements: acquisition of land, demolition of buildings, preparation of detailed urban plans and projects, field survey, rehabilitation works, land development around the building, communal equipment of the land and the like” (MONSTAT, 2024).
  - 43 The price of creating the project documentation is the price obtained from the private office of the Project Bureau in Nikšić.
  - 44 Other costs include all construction costs such as: contributions and fees for connections to the electrical network and other communal facilities, fees for obtaining a building permit, VAT, interest on loans and advances, etc. (They are separated from official other costs according to MONSTAT (2024) building design costs and we calculated them in all regions at the same price, that is 25.00 euros) (MONSTAT, 2024).
  - 45 The Government of Montenegro has the possibility to provide the land, but this study does not have the government’s consent secured, but this is only a form of proposal).

***Recommendation 2: It is necessary to establish the following structure of the potential project holder***

- Establish the National Steering Committee (the Minister of Finance, the Minister of Labour and Social Welfare and the Minister for Human and Minority Rights).
- Establish the National Coordination Board as a leading entity of the potential project, a member of which shall be, among others, the representative of the implementation unit.<sup>46</sup>
- **The Administration for Capital Projects shall be the Implementation Unit**
- Public calls for the carrying out of construction works of potential housing facilities shall be the responsibility of the Implementation Unit. The Implementation Unit shall be the legal body with which the contract on construction works is to be concluded.
- The legalisation process shall be within the authority of the municipalities.
- Selection of the beneficiaries of the housing facilities shall be under the authority of the National Coordination Body (which is to be previously established).
- Contractual relations with potential beneficiaries shall be under the authority of the municipality.
- Payments in all cases shall be within the authority of the Ministry of Finance (State Treasury), according to the issued invoices, which shall have been previously approved by the contract body (Implementation Unit or Coordination Body).

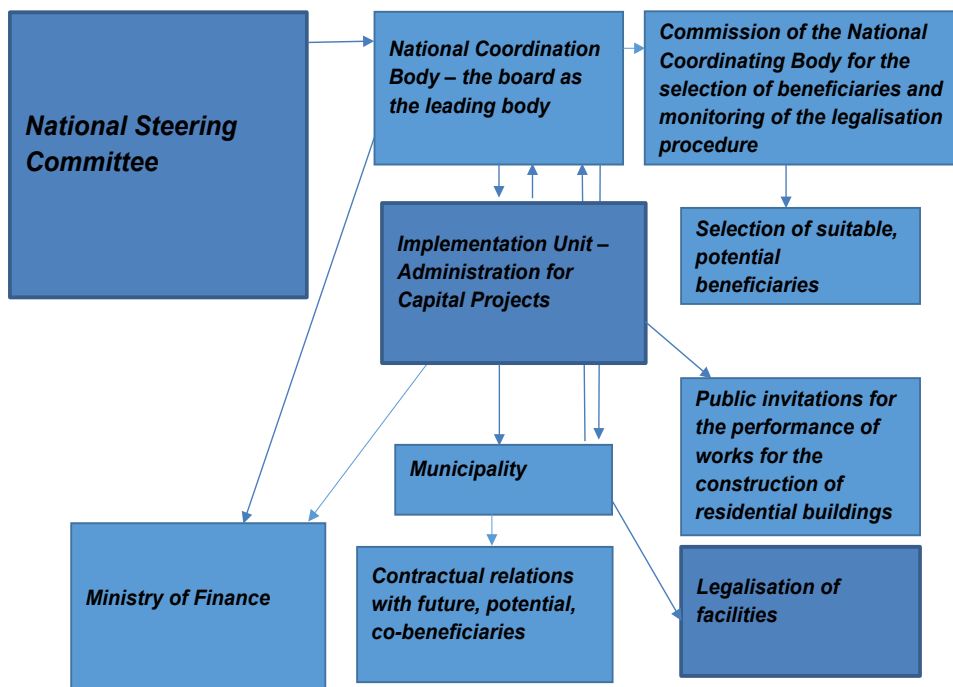
This recommendation implies that it would be necessary for the Government of Montenegro to establish **the National Steering Committee**. The committee would consist of three responsible ministers, who would act as a link between the holders of the project, i.e. the National Coordination Board and the government, and perform duties within the authority of the ministers. Having researched during the study the potential roles of the institutions in the realisa-

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<sup>46</sup> Consisting of the representative of the Ministry of Labour and Social Welfare (4), the Ministry for Human and Minority Rights (1) and the representative of the Implementation Unit.

tion of the project, i.e. their responsibilities and authority, the study found that it would be most purposeful to establish the National Coordination Board as the leading body of the project. Its members would be the recommended representatives of the Ministry of Labour and Social Welfare, the Ministry for Human and Minority Rights and the representative of the Implementation Unit. The Implementation Unit would be **the Administration for Capital Projects**. Its authority, as a central unit at the central level, would include the complete tender procedure, as well as keeping records on all acquisitions. Legalisation of the existing housing facilities would be under the authority of the municipalities; the legalisation would be open for 24 months in the recommended municipalities, whereby a municipality would withdraw money for the legalisation after obtaining consent from the National Coordination Board as the leading entity of the project, after the whole legalisation process of each individual facility has been completed. Regarding all the payments, the National Coordination Board would have to give its consent. The payment itself would be carried out by the Treasury of the Ministry of Finance. The recommended structure is given below:

## 2.1 The appearance of the structure should be as shown in the diagram



## 2.2 Responsibilities of each of the organs in the structure

	<i>The National Steering Committee</i>  <i>(Minister of Finance, Minister of Labour and Social Welfare and Minister of Human and Minority Rights)</i>	<i>National Coordination Body – Project Implementation Committee<sup>47</sup></i>	<i>Project Implementation Unit</i>	<i>Municipalities</i>
<i>Institutional setup</i>	<p>Signs a contract for a potential grant.</p> <p>Ensures that the government appoints a National Coordinating Body – the board as the leading body of the potential project (project leader)</p>	<p>Ensures the development, use and monitoring of the implementation of project procedures.</p> <p>Ensures the development and signing of all the necessary inter-institutional agreements.</p> <p>Ensures the development/signing of a contract for a potential grant</p> <p>Formally appoints the necessary staff on the project</p> <p>Develops and concludes all the necessary agreements.</p> <p>With the Implementation Unit, signs an agreement on the realisation of all the necessary public procurements.</p> <p>Develops and adopts procedures for monitoring the implementation of public procurement by this body.</p>	<p>Ensures the development and conclusion of all necessary inter-institutional agreements.</p> <p>Appoints the necessary staff on the project.</p> <p>Develops, adopts and uses procedures.</p> <p>Develops and implements a procurement and contract management system.</p> <p>Manages technical assistance resources.</p>	<p>Help develop procedures for using money for the legalisation of facilities.</p> <p>Ensure the development of the procedure for the implementation of the legalisation of facilities.</p>

<sup>47</sup> Composed of representatives of the Ministry of Labour and Social Welfare (3), the Ministry of Human and Minority Rights (1) and an external associate (1).

<i>Institutional setup</i>		Develops and adopts procedures for using money for the legalisation of facilities and approves payments.		
<i>Selection of beneficiaries</i>		Conducts the selection process (establishes the selection committee that initiates the call, announces the preliminary and final results of the selection)		Have a representative in the selection committee
<i>Subprojects</i>	Approves the subproject applications at the request of the National Coordination Body – Project Implementation Committee	Prepares subproject applications. Submits the applications to the Steering Committee Contributes to the creation of subproject applications.	Contributes to the creation of subproject applications	Contribute to the creation of subproject applications
<i>Procurement</i>		Delivers original versions of agreements to the donor. Approves the announcement of invitations, tenders, etc. Signs contracts with contractors. Approves the expenditure of funds for running costs.	Drafts/concludes inter-institutional agreements with municipalities on solving the housing issues of Roma and Egyptians. Creates procurement plans. Develops tender documentation controls Announces tenders and evaluates all the offers. Keeps proper records of all project procurements.	Sign agreements with the National Coordination Body and the Implementation Unit when the project is related to the territory of that municipality.  Contribute to the procurement plans.

<i>Contract implementation and management</i>		<p>Monitors the implementation of the Agreement.</p> <p>Approves the call for tenders and the start of works.</p> <p>Requests from the Ministry of Finance to make payments.</p> <p>Approves the payment requests.</p> <p>Provides exemption from VAT.</p>	<p>Monitors the contract implementation</p> <p>Monitors the start of works, delivered works, invoices, payments, etc</p> <p>Requests from the Ministry of Finance to make payments according to the requests approved by the Coordination Body.</p>	<p>Monitor legalisation procedures.</p> <p>Require the payment of funds for the completed legalisation procedures.</p>
<i>Monitoring and reports</i>	<p>Approves the Rulebook on the Work of the National Coordination Body – Project Implementation Committee</p>	<p>Creates rules of procedure.</p> <p>Creates subproject reports.</p> <p>Submits subproject reports.</p> <p>Monitors and records all the realised activities and reports to the donor bi-annually.</p>	<p>Delivers all the necessary information to the governing body.</p> <p>Writes reports for all the completed procurements with all the necessary elements and submits them to the governing body.</p>	<p>Provide, upon request, all the necessary information about the activities on project implementation to the governing body</p>
<i>Finances</i>		<p>Prepares requests to donors for funds.</p> <p>Prepares requests to the Ministry of Finance for funds for all the necessary transactions</p> <p>Establishes bank accounts.</p> <p>Ensures cash flow</p> <p>Performs the accounting.</p>	<p>Prepares requests to the Ministry of Finance for funds for all the necessary transactions.</p> <p>Establishes bank accounts.</p> <p>Ensures cash flow. Performs the accounting.</p>	<p>Prepare requests to the Coordination Board for funds for legalisation.</p> <p>Keep records of all the legalisation procedures.</p>
<i>Handover to beneficiaries</i>		<p>Provides the transfer of ownership</p>		<p>Conclude a lease agreement</p>

## 2.3 Assessment of the necessary funds for the realisation of projects in Montenegro

### 2.3.1 Administration for Capital Projects as the Implementation Unit

No.	Position	Number of employees to work on project	Average (gross) earnings <sup>48</sup> (€)	Engagement (% of working time)	Amount per person (€)	Total for all persons (monthly level, €)	Total for all persons (monthly level, €)
1.1	Coordinator of the Implementation Unit – PIU <b>(Management position of the Administration for Capital Projects)</b>	1	1,178	40%	471.20	471.20	5,654.40
1.2	<b>Project manager</b> (Engineers of the Administration for Capital Projects)	3	1,178	40%	471.20	1,413.60	16,963.20
1.3	<b>Administrator for Technical Affairs, Contract Management and Public Procurement</b> (Representative of the Administration for Capital Projects)	1	1,178	40%	471.20	471.20	5,654.40
1.4	<b>Financial Administrator PIU</b> (Representative of the Administration for Capital Projects)	1	1,178	40%	471.20	471.20	5,654.40
<b>IN TOTAL Implementation Unit</b>		<b>6</b>					<b>33,926.40</b>

<sup>48</sup> Average earnings (wages), MONSTAT, 2024, Podgorica, Montenegro.



The responsibility for the realisation of all project activities related to acquisition procedures would be under the authority of this body. The Administration for Capital Projects would act as the Implementation Unit in the potential project. It would be formally responsible for the whole acquisition process, which is the largest part of this potential project.

### ***About the Implementation Unit in brief***

“The Administration for Capital Projects carries out activities regarding: previous and preparatory works, studies, research activities and investment programmes, giving professional assessment of the documentation on investment decisions, procurement of the decision on location and urban-technical conditions for certain facilities, related to construction and reconstruction of the facilities of primary technical infrastructure, facilities of state bodies, medical care, education, culture and sport, facilities and resorts located at attractive sites and other facilities of public interest whose construction is funded by the State.”<sup>49</sup>

The budget of the Administration for Capital Projects includes the realisation of 264 projects, which encompasses cumulative positions through which a larger number of subprojects are realised. As part of the indirect management of IPA funds within the IPA II perspective (2014–2020), the Administration for Capital Projects acts as an Implementation Agency for the 2014, 2016, 2017 and 2018 Annual Action Programmes, as well as for the Sectoral Operational Programme for Employment, Education and Social policy (SOPEES) 2015–2017, and within the IPA III perspective (2021–2027), the Administration for Capital Projects acts as the Implementation Agency for the 2021 Annual Action Programme. The total number of active projects included in these programmes is 25.

The Administration for Capital Projects is also responsible for the implementation of the projects funded by the CEB and EIB.

**CEB projects:** kindergarten in Bar; kindergarten in Ulcinj; kindergarten in Berane; kindergarten in City Kvart, Podgorica; kindergarten in Plav; kindergarten in Bijelo Polje, kindergarten in Stari Aerodrom, Podgorica; and “Tuški put” and “Zlatica” kindergartens in Podgorica. Reconstruction of preschool institutions – **EIB projects:** Gymnasium No. 2 in Podgorica, and the following elementary schools in Podgorica: in Zabjelo, City Kvart and Karabuško Polje – Tuzi; and the reconstruction and upgrading of the kindergarten in Zabjelo, Podgorica.

Previously, the Administration for Capital Projects, as the Implementation Unit, successfully realised the project “Regional Housing Programme” in coopera-

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<sup>49</sup> Government of Montenegro, URL:<https://www.gov.me/ujr> (accessed on 28 June 2024).

tion with the Ministry of Labour and Social Welfare. Through this project, the status of internally displaced people in Montenegro was partially resolved.

The organisational structure of the Administration for Capital Projects consists of: the Department for Planning, Technical Preparation and Implementation of Capital Projects of High-Rise Construction and Tourist Infrastructure – nine employees; the Department for Planning, Technical Preparation and Implementation of Capital Projects of Low-Rise Construction and Traffic Infrastructure – 10 employees; the Department for Finance, Public Procurement and General Affairs – 28 employees; The Department for Legal and Personnel Affairs, Quality Control and Realisation of Contracts – seven employees; the Department for the Realisation of IPA Projects – 13 employees. The total number of permanent employees is 67.

## 2.4 National Coordination Board for Project Implementation

No.	Position	Number of employees to work on project	Average (gross) earnings <sup>50</sup> (€)	Engagement (% of working time)	Amount per person (€)	Total for all persons (monthly level, €)	Total for all persons (monthly level, €)
1.1	Main Project Coordinator (Representative of the Ministry of Labour and Social Welfare)	1	1,178.00 <sup>51</sup>	50%	589.00	589.00	7,086.00
1.2	Project Coordinator, junior (Representative of the Ministry of Human and Minority Rights)	1	1,178.00	50%	589.00	589.00	7,086.00
1.3	Executive Administrator (Representative of the Ministry of Labour and Social Welfare)	2	1,178.00	30%	353.40	706.80	8,481.60
1.4	Technical/Support staff	1	808.00 <sup>52</sup>	100%	808.00	808.00	9,696.00
Annual total – National Coordination Board		6					33,926.40

<sup>50</sup> Average earnings (wages), MONSTAT, 2024, Podgorica, Montenegro.

<sup>51</sup> State Administration.

<sup>52</sup> Administrative and auxiliary service activities.

### 2.4.1 About the Coordination Board in brief

This body would consist of four members of the Ministry of Labour and Social Welfare and one member of the Ministry for Human and Minority Rights. The role of this body in the project would include all the necessary activities required during the project realisation, administration of all required documentation, from the Rulebook on the Work of the Board to the establishing of the Board for the Selection of Beneficiaries. Its role would also be to prepare all the required inter-institutional contracts, to supervise all the activities carried out during the project, to report every six months to the donors on all activities both carried out or planned related to the project. This body would be the main link between the Government of Montenegro, i.e. the National Board of Directors, and the Implementation Unit. Apart from the above, this body would approve the realisation of the project in every municipality.

This body would take formal responsibility for the realisation of the project.

### 2.5 Running costs<sup>53</sup>

Running costs				
<i>Item</i>	<i>Unit</i>	<i>Quantity</i>	<i>Unit cost/ month (€)</i>	<i>Total (€ p.a.)</i>
<i>Office rent and utilities</i>	month	12	300.00	3,600
<i>Office costs, electricity, water, sewerage, etc</i>	month	12	150.00	1,800
<i>Travel costs, petrol for vehicle</i>	km	6,000	1.80	9,800
<i>Office, costs for materials</i>	month	12	500.00	6,000
<i>Office, mobile, postage, etc</i>	month	12	330.00	3,960
<i>Other, unexpected costs</i>	month	12	400.00	4,800
<i>In total</i>				<b>29,960</b>

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<sup>53</sup> Current costs were estimated based on data obtained from project costs (RHP – Regional Housing Programme for Montenegro).

## 2.6 Additional staff

No.	Position	Number of employees to work on project	Average (gross) earnings (€) <sup>54</sup>	Engagement (% of working time)	Amount per person (€)	Total for all persons (monthly level, €)	Total for all persons (yearly level, €)
1.1	Implementation Unit – PIU	1	1,178.00 <sup>55</sup>	100%	1,178.00	1,178.00	14,136.00
1.2	Commission for the selection of users and legalisation procedures <sup>56</sup>	11	1,178.00	30%	353.40	3,887.40	46,648.80
1.3	Ministry of Labour and Social Welfare Consultant during the project	1	1,178.00	40%	1,178.00	471.20	5,654.40
<i>In total</i>		<b>13</b>					<b>66,439.20</b>

### About additional staff costs in brief

The Administration for Capital Projects has explained the additional staff under 1.1 as an optional possibility in case any complications occur during the project realisation.

The additional staff under 1.2 are intended to be one representative from each of the eight municipalities for the Committee for the Selection and Supervision of the Legalisation Process. This is in order to have a person in every municipality responsible to help Roma and Egyptian people regarding preparation of documentation for both the legalisation of the facilities and taking part in the competition for using the housing facilities. These persons would also be members of the Committee for the Selection of the Beneficiaries and they would carry out the whole selection process. It is essential to compensate the members of this committee, as well as the representatives of the Ministry of

<sup>54</sup> Average earnings (wages), MONSTAT, 2024, Podgorica, Montenegro.

<sup>55</sup> State Administration.

<sup>56</sup> Total for the work of the committee until the end of the entire selection process.

Labour and Social Welfare (2) and the representative of the Ministry of Human and Minority Rights (1), to ensure that the entire process of resolving the housing issues of Roma and Egyptian people is, among other things, motivating for these employees. The additional staff under 1.3 comprise a person who would monitor the whole project from beginning to end, report to the donor, take photographs of each stage of the project and finally issue an invoice about all activities within the project from beginning to end. That study would record all the challenges encountered during the realisation of the project, as well as activities that can represent positive practice for future projects.

### ***Total costs of the project***

<i>Activity</i>	<i>Potential project (€)</i>	<i>Participation</i>
Legalisation of existing facilities	145,369.10	
Construction of residential units	23,244,177.00	5,030,725.00
<b><i>TOTAL for the entire project</i></b>	<b>23,389,546.10</b>	<b>5,030,727.00</b>
<i>Staff</i>		
Implementation costs – Implementation Unit	33,926.40	
Implementation costs – National Coordination Body	32,331.60	
Administration costs	29,960.00	
Additional staff	66,439.20	
<b><i>TOTAL (annual staff)</i></b>	<b>162,657.20</b>	



## CONCLUSION:

### Key Findings and Recommendations

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The study sheds light on the ongoing housing crisis affecting Roma and Egyptian communities in Montenegro, where thousands continue to live in sub-standard conditions. Population data shows that, as of 2023, 5,629 individuals identified as Roma (0.9% of the total population), and 1,655 identified as Egyptians (0.27%). However, estimates from the Ministry of Human and Minority Rights and the Council of Europe suggest that the actual numbers may exceed 12,000 and could be as high as 25,000. Despite this significant presence, housing conditions remain a critical concern, with many individuals residing in informal settlements that lack basic infrastructure such as roads, electricity, and water.

The study finds that, although 231 housing units were provided for Roma and Egyptians between 2016 and 2018, these efforts have been insufficient to address the broader housing needs. The lack of a centralized database to systematically track housing conditions further hinders efforts to assess and improve the situation. While a unified data system has been recommended since 2003, it remains unimplemented, forcing policymakers to rely on fragmented and inconsistent information.

In addition to housing, the study highlights the socio-economic challenges these communities face. Reports from the National Roma Contact Point on implementation of the Strategy for Social Inclusion of Roma and Egyptians in Montenegro for 2022 and 2023 show that Roma and Egyptians are among the most socio-economically marginalised groups in Montenegro. Their situation has been exacerbated by the COVID-19 pandemic, with many experiencing heightened discrimination, hate speech, and hate crimes. Educational and employment opportunities remain limited, compounding their vulnerability and perpetuating cycles of poverty.

During the preparation of the study, a survey was conducted in June 2024 across eight municipalities. On that occasion, **2,416 individuals from 673 households were interviewed**. These data offer valuable insights into the housing and socio-economic situation of Roma and Egyptians in Montenegro in those eight municipalities.

The study shows that in Montenegro - in particular in the **eight municipalities covered by this research - a significant number of Roma and Egyptians**

**have yet to resolve their housing issues.** Furthermore, there is a significantly large number of families living in substandard housing units that do not even meet the minimum standards required to address basic existential needs.

The National Housing Strategy (2011–2020) and the Law on Social Housing define social housing as a right for individuals or households unable to resolve their housing issues. These frameworks prioritise vulnerable groups, including Roma and Egyptians, for social housing programs. **However, although most municipalities have adopted local housing programs, their implementation is inconsistent and does not reflect the real situation.** Interviews with local authorities revealed that the identified needs always exceed the measures currently in place, which is why actual data is not provided in the relevant documents. To address these shortcomings, the study **recommends a phased legalisation of informal settlements, combined with targeted infrastructure upgrades.** Legalisation would provide a framework for ensuring access to basic services such as electricity, water, and sanitation. Municipalities therefore must play a central role in this process, supported by national-level oversight.

The governance framework proposed includes several levels, featuring a **National Administrative Board** including essential ministries (such as Finance, Social Welfare, and Human Rights), a **National Coordination Committee** responsible for overseeing implementation, and an **Implementation Unit** located within the [Administration for Capital Projects](#) to handle construction management and logistics.

This document identifies also the key roles required for future housing solutions. **Strengthening municipal administrative capacities is necessary, as many local governments lack the resources and expertise to develop and manage housing programs effectively.** Providing training and financial resources will empower municipalities to implement housing projects tailored to the specific needs of Roma and Egyptian communities.

Strong financial support is crucial to the success of the housing project proposed by this study. The document outlines the funding requirements for each municipality and the total financial resources needed for effective project implementation. **While government budget allocations are essential, additional funding can be secured through contributions from donors and partnerships with the private sector.** The study proposes estimated costs to be divided into two main categories: the **legalisation of existing informal settlements and the construction of new residential units.** The legalisation of existing informal housing facilities is projected to cost €145,369. This process involves formalising the status of informal settlements, allowing residents to access essential services such as electricity, water, and sanitation. The construction of new residential units represents the largest portion of the project, with an estimated cost of €23,244,177. This includes building new

homes for Roma and Egyptian families who currently live in inadequate housing conditions. The project is expected to receive €5,030,725 in contributions, which should come from a variety of funding sources, including national and international donors, as well as local government contributions. The total cost for the entire project - covering both the legalisation of existing facilities and the construction of new residential units - is projected to be €23,389,546 with €5,030,727 allocated from various stakeholders. Moreover, the study emphasizes the importance of **integrating housing projects into broader social inclusion policies**. Housing interventions alone will not resolve the challenges faced by Roma and Egyptian communities. To create sustainable change, these efforts must be complemented by programs focused on education, health-care, and employment. Involving community members in decision-making processes ensures that interventions are relevant and effective, addressing their specific needs and priorities.

By adopting a comprehensive and collaborative approach, Montenegro can significantly improve the housing and living conditions of Roma and Egyptian communities. This would mark a pivotal step toward greater social inclusion, adherence to human rights standards, and the establishment of a more equitable society





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