

# FEASIBILITY STUDY FOR SOCIAL HOUSING IN THE MUNICIPALITY OF PODGORICA, MONTENEGRO



Roma Integration Phase III

Co-funded  
by the European Union



EUROPEAN UNION

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

Co-funded and implemented  
by the Council of Europe



# FEASIBILITY STUDY FOR SOCIAL HOUSING IN THE MUNICIPALITY OF PODGORICA, MONTENEGRO

## **Author**

Luka Maraš, LL. B

June, 2025

Council of Europe

*This publication was produced with the financial support of the European Union and the Council of Europe. Its contents are the sole responsibility of the author(s). Views expressed herein can in no way be taken to reflect the official opinion of the European Union or the Council of Europe.*

The reproduction of extracts (up to 500 words) is authorised, except for commercial purposes as long as the integrity of the text is preserved, the excerpt is not used out of context, does not provide incomplete information or does not otherwise mislead the reader as to the nature, scope or content of the text. The source text must always be acknowledged as follows “© Council of Europe, year of the publication”. All other requests concerning the reproduction/translation of all or part of the document, should be addressed to the Directorate of Communications, Council of Europe (F-67075 Strasbourg Cedex or publishing@coe.int).”

All other correspondence concerning this document should be addressed to the Directorate General of Democracy and Human Dignity (DGI) Roma and Travellers Division Avenue de l'Europe F-67075 Strasbourg Cedex, France

Cover design and layout:  
3M Makarije Podgorica

Photos:  
Council of Europe, ©Shutterstock

Council of Europe Publishing  
F-67075 Strasbourg Cedex  
<http://book.coe.int>

# Table of Contents

<b>EXECUTIVE SUMMARY</b>	<b>7</b>
<b>INTRODUCTION</b>	<b>9</b>
<b>1. SITUATIONAL ANALYSIS</b>	<b>13</b>
1.1. Analysis of the position of Roma and Egyptians in the Municipality of Podgorica	15
<b>2. STRUCTURE OF THE STUDY</b>	<b>21</b>
<b>3. RESEARCH METHODOLOGY</b>	<b>23</b>
<b>4. ASSESSMENT OF THE LEGAL FRAMEWORK</b>	<b>25</b>
<b>5. DEMOGRAPHIC AND SOCIO-ECONOMIC CHARACTERISTICS     OF ROMA AND EGYPTIANS IN PODGORICA</b>	<b>20</b>
5.1. Gender structure and household size	29
5.2. Personal documents	31
5.3. Poverty	34
5.4. Housing	36
5.5. Education	39
<b>6. ANALYSED POSSIBILITIES FOR ADDRESSING THE HOUSING     NEEDS OF ROMA AND EGYPTIANS IN THE MUNICIPALITY     OF PODGORICA</b>	<b>41</b>
6.1. Legalisation of residential buildings in Roma settlements in Podgorica	41
6.2. Possibility of allocating construction land	43
6.3. Adaptation of existing residential buildings	43
<b>7. RECOMMENDATIONS FOR RESOLVING THE HOUSING     SITUATION OF ROMA AND EGYPTIANS IN PODGORICA</b>	<b>45</b>
7.1. Table of costs – adaptation of existing residential buildings in the Vrela Ribnička settlement	46
<b>8. RECOMMENDATIONS FOR IMPROVING LIVING CONDITIONS     AND SOCIAL INCLUSION OF ROMA AND EGYPTIANS     IN PODGORICA</b>	<b>49</b>
<b>9. CONCLUSION</b>	<b>51</b>



# EXECUTIVE SUMMARY

---

**T**his study was commissioned by the Council of Europe as part of the European Union/Council of Europe Joint Programme [Roma Integration III](#), which is managed by the Council of Europe's Roma and Travellers Division. It was conducted in cooperation with the Ministry for Social Welfare, Family Care and Demography of Montenegro and the local self-government of Podgorica, the capital city. The study examined the housing conditions and socio-economic status of the Roma and Egyptian communities in Podgorica.

Despite existing national and local initiatives in the field, many Roma and Egyptian households continue to live in poor conditions. The research covered 172 households and 1,021 respondents in Podgorica and showed that households have on average 5.94 members and that many families face serious poverty.

A particularly alarming finding is that more than 40% of surveyed families live in completely inadequate housing, with poor infrastructure, and do

not have legal residence status or personal documentation, which prevents them from accessing health-care and social protection.

Despite significant measures being undertaken in previous years, including the construction of 243 housing units through IPA projects and the Regional Housing Programme, more than 1,000 members of the Roma and Egyptian communities in Podgorica continue to live in inadequate and informal housing. The study also highlights the lack of personal documents, as well as challenges in education and employment, particularly among women and young people.

Based on field research, interviews with relevant institution representatives, demographic surveys and an analysis of the legal and urban planning framework, the study provides a comprehensive analysis and offers recommendations for improving living conditions, securing housing rights and fostering social inclusion.

Regardless of previous efforts, through the IPA supported social housing project, and the Regional Housing Programme, it is evident that the needs of this community still exceed the capacity of existing facilities. In addition to urban planning obstacles related to the legalisation of informal settlements, an additional challenge is the lack of available construction land that the Capital City could allocate for the development of new housing units. This significantly limits the possibilities for improving the housing situation of Roma and Egyptians in Podgorica.

Based on this analysis, the study recommends adapting five buildings owned by the City of Podgorica in the Vrela Ribnička area, to provide adequate housing for several dozen Roma and Egyptian families. The total estimated cost of the adaptation (including the interior of the units, bath-

rooms, façades and roofs) is approximately €1,231,000 plus VAT. Further recommendations include providing systematic legal support regarding residence legalisation and acquisition of citizenship; implementing measures to support the educational inclusion of children; strengthening the economic participation of women; and informing the community about available healthcare services.

The study emphasises that resolving the housing issues of the Roma and Egyptian communities, and improving their living conditions, requires an integrated, multi-layered approach involving state institutions, local authorities, international partners and civil society. This approach must have clearly defined governance mechanisms, transparent aid allocation and ensure the long-term sustainability of the proposed solutions.



# INTRODUCTION

---

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

The 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 in order to prevent the for-

mation of ghettos and to encourage integration within mainstream communities. **Article 31** of the [European Social Charter \(ESC\)](#) requires states to provide affordable, high-quality housing for all, including vulnerable groups such as the Roma community. This article has played a key role in evaluating the housing conditions of the Roma community and advocating for improvements.

The [European Committee of Social Rights \(ECSR\)](#) has ruled on several cases concerning the housing of the Roma community, often identifying violations of the European Social Charter with regard to insecure tenure, forced evictions and the practice of segregated housing. These rulings reinforce the importance of secure housing rights, as reflected in the [European Commission against Racism and Intolerance \(ECRI\)](#) reports, which

---

<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.

regularly urge central and local authorities to eliminate housing discrimination and adopt measures to ensure equal access.

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

Alongside this Council of Europe regulatory framework, 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 the signatory Beneficiaries to improve the housing conditions of the Roma community. The Declaration commits participating countries to addressing informal settlements, ensuring access to essential services and improving housing security for the Roma community, thereby aligning closely with CoE standards. It also emphasises the importance of utilising 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 substandard housing, discrimination and segregation experienced by Roma communities. Ministers are committed to addressing these challenges by integrating Roma housing needs into central strategies and action plans. This approach aligns with the focus of both the Council of Europe (CoE) and the Poznań Declaration on securing the legal status of housing units and preventing evictions. The conclusions also emphasise the importance of equal access to public housing services and the integration of the Roma community into mainstream housing programmes, reflecting the Council of Europe's (CoE) emphasis on non-discrimination and desegregating housing policies.

Both the Poznań Declaration and the ministerial conclusions advocate for a holistic approach to housing, integrating housing policy with employment, education and healthcare to address 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.

The Council of Europe's recommendations, the Poznań Declaration and the ministerial conclusions related

to Roma housing all share a commitment to improving the housing conditions of Roma communities through non-discrimination, providing secure and adequate housing and ensuring the participation of the Roma community 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 experienced by the Roma community across Europe.



# 1. SITUATIONAL ANALYSIS

---

According to the most recent official Census of Population from 2023, Montenegro covers a total area of 13,883.1 km<sup>2</sup> and has a population of 623,633<sup>2</sup> citizens. Within the Census, 5,629 individuals declared themselves as Roma by nationality, accounting for 0.90% of the total population, while 1,655 individuals identified as Egyptian, representing 0.27% of the total population. Several reports, including the European Commission Progress Reports for 2022<sup>3</sup> and 2023<sup>4</sup> state that the Roma and Egyptian communities in Montenegro remain among the most socio-economically vulnerable population groups. Their already challenging position has been further exacerbated by the consequences of the COVID-19 pandemic. This situation has been acknowledged by both the European Union and the Council of Europe,

which are undertaking a range of targeted actions to improve the status of Roma and Egyptians, with a particular emphasis on systemic and sustainable solutions aimed at addressing the root causes of exclusion and inequality.

According to the 2023 European Commission Progress Report<sup>5</sup> children from these communities continue to be heavily involved in begging, and Roma and Egyptians remain among the most vulnerable groups. Antigypsyism persists as a serious concern. Ghettoisation, segregation and increased social distance significantly hinder the development of social skills among children from these communities, resulting in social isolation. Therefore, it is essential to develop social activation models targeting children from Roma and Egyptian families and to provide

---

2 Population of Montenegro by national or ethnic affiliation, religion, mother tongue and language usually spoken, Monstat, 2025, available at: [https://www.monstat.org/uploads/files/popis%202021/saopstenja/SAOPSTENJE\\_Popis%20stanovnistva%202023%20II\\_cg.pdf](https://www.monstat.org/uploads/files/popis%202021/saopstenja/SAOPSTENJE_Popis%20stanovnistva%202023%20II_cg.pdf).

3 Montenegro 2022 Report, European Commission, available at: <https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-10/Montenegro%20Report%202022.pdf>.

4 Montenegro 2023 Report, European Commission, available at: <https://op.europa.eu/en/publication-detail/-/publication/66f8eded-7eee-11ee-99ba-01aa75ed71a1/language-en>.

5 Ibid.

support and guidance for families, with the aim of reducing the number of children requiring any form of institutional care.



*Figure 1. Children from a Roma household in front of their place of residence*

The same report reveals that the Roma and Egyptian communities continue to be subjected to discrimination, hate speech and hate crimes. They also face numerous obstacles when it comes to exercising their rights, and the protection of the Romani language still does not align with European Union legislation and standards. This greatly increases the difficulties that children from these communities face when trying to learn in primary schools.

Addressing the issue of inclusion for Roma and Egyptians requires a com-

prehensive approach involving coordinated efforts at state, local community, international and civil society levels. Implementing policies that empower these communities can lead to genuine social inclusion. To achieve this, activities aimed at improving the social and economic status of Roma and Egyptians should focus primarily on housing, education, social protection and legal and social status.

According to the Constitution of Montenegro, members of the Roma and Egyptian populations are not explicitly recognised as a national minority. Instead, they are considered part of the broader category of minority peoples and communities alongside other ethnic, religious or linguistic minorities in the country.<sup>6</sup>

The Constitution prohibits all forms of discrimination and incitement to hatred, while international legal instruments—including the International Covenant on Civil and Political Rights (ICCPR)<sup>7</sup>, the International Covenant on Economic, Social and Cultural Rights (ICESCR)<sup>8</sup>, the Convention on the Rights of the Child (CRC)<sup>9</sup>, the International Convention on the Elimination of All Forms

---

6 Constitution of Montenegro – consolidated text, Ministry of Public Administration, 03 November 2022, available at: Ustav Crne Gore - prečišćen tekst.

7 International Covenant on Civil and Political Rights, UN General Assembly, 16 December 1966, available at: International Covenant on Civil and Political Rights - A/RES/21/2200 A Annex 2 - UN Documents: Gathering a body of global agreements.

8 International Covenant on Economic, Social and Cultural Rights, UN General Assembly, 1976, available at: International Covenant on Economic, Social and Cultural Rights - Manual for Human Rights Education with Young people.

9 Convention on the Rights of the Child text, Unicef, 2 September 1990, available at: Convention on the Rights of the Child text | UNICEF.

of Racial Discrimination (CERD)<sup>10</sup>, and the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)<sup>11</sup> — take precedence over national legislation.

### **1.1. Analysis of the position of Roma and Egyptians in the Municipality of Podgorica**

Podgorica is the capital and largest municipality of Montenegro, located in the central-eastern part of the country at an altitude of 40 metres above sea level. Covering an area of approximately 1,441 km<sup>2</sup>, it is the second-largest municipality in Montenegro by territory, after Nikšić, and accounts for about 10.4% of the country's total area. According to the results of the 2023 Census, Podgorica has a population of 179,505, representing approximately 28.8% of Montenegro's total population. Of this number, 3,431 people identified as Roma, representing 1.91% of Podgorica's population, and 528 people identified as Egyptian, accounting for 0.29% of the municipal population.

The challenges faced by the Roma and Egyptian communities in Podgorica, as identified through the situational analysis, correspond

entirely to the issues and priorities recognised at the national level and set out in the 2021-2025 Strategy for the Social Inclusion of Roma and Egyptians in Montenegro. The most prominent challenges are:

1. Severe social deprivation, poverty, and segregation;
2. Inadequate housing conditions and infrastructure;
3. High unemployment and lack of skills;
4. Issues related to legal status.

As the research shows, many Roma and Egyptian households in Podgorica, particularly in the Vrela Ribnička settlement, live in unlegalised solid-structure buildings, makeshift barracks or abandoned collective centres. All surveyed households reported living in inadequate, and often inhumane, housing conditions, which create numerous additional problems.

A particular challenge is that it is extremely difficult to provide support to improve housing conditions or ensure access to infrastructure such as electricity, sewage, and paved roads for some of the illegally constructed buildings and barracks. This is mainly because many of these buildings are located in areas designated for landscaping or green spaces in ur-

---

10 International Convention on the Elimination of All Forms of Racial Discrimination, UN General Assembly, 21 December 1965, available at: International Convention on the Elimination of All Forms of Racial Discrimination | OHCHR.

11 UN Convention -Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) – Summary, UN General Assembly, 1979, available at: UN Convention (CEDAW) - Summary - Gender Matters.

ban planning documents. Residents in this area often access utilities through illegal connections to water and street lighting networks, or by informally tapping into the electricity supply of neighbouring, legally connected households.

*Figure 2. Permanently constructed housing*



*unit located near the municipal landfill*

In terms of road infrastructure, the Municipality of Podgorica has provided adequate infrastructure in the parts of the settlement covered by an existing spatial planning document, although certain high-traffic sections already require rehabilitation. The relevant authorities have plans to pave the section of road that provides access to the aforementioned collective centres. How-

ever, it is highly unlikely that access to the barracks located within the designated green zone will ever be provided in accordance with established standards.

Segregation remains a defining feature of Roma and Egyptian population's presence in Podgorica. According to the present study, Vrela Ribnička is the only organised Roma and Egyptian settlement in the city. Data provided by enumerators during the 2023 Census indicate that approximately 3,500 members of this population reside there, out of a total of 3,959. Although this settlement covers a relatively large area, Roma and Egyptians are concentrated in the lower part, alongside the municipal landfill (raising concerns about public health and the environment) and Špiro Mugoša Airport.

Between 2015 and 2018, the housing situation for the Roma and Egyptian populations in Podgorica significantly improved through the construction of 219 housing units, estimated to be worth approximately 10 million euros, as part of the IPA Project and the Regional Housing Programme (RHP)<sup>12</sup>. These housing units were built in three phases. During the first phase, which was implemented through the IPA project, five buildings containing a total of 48 housing units were constructed. The second

<sup>12</sup> Information on the implementation of the Regional Housing Programme (RHP) in Montenegro, Government of Montenegro, 03 August 2023, available at: <https://www.gov.me/dokumenta/805ca930-0bd8-492c-8c8b-a263000856e1>.



and third phases, carried out through the RHP, resulted in the construction of a further 12 buildings with 120 housing units in the second phase and an additional five buildings with 51 housing units in the final phase.

This process resulted in the closure of Camps Konik 1 and Konik 2<sup>13</sup>. The individuals who had previously lived in barracks and containers were relocated to housing units — i.e. solid buildings constructed in accordance with social housing standards. Management and maintenance of these buildings were assumed over by the Capital City of Podgorica through competent public utility companies founded by the city. Members of the Roma and Egyptian communities living in these buildings signed lease agreements with the Capital City, defining the amount of rent to be paid for use of the housing units. The rental amount is nominal, and families who receive social assistance are exempt from paying rent.

The Municipality of Podgorica faces a number of challenges in maintaining these buildings, while working with tenants to promote responsible use and sustainable housing management. Nevertheless, by working with the residents, the Municipality is able to address urgent

issues and occasionally carry out investment-related work. Notably, the first social housing building with 24 units was constructed in the same area in 2006 for members of the Roma and Egyptian communities displaced from Kosovo. According to data available to the local government, approximately 2,000 Roma and Egyptian people are currently accommodated in the 23 buildings (containing 243 housing units) and other social housing facilities in Podgorica.

It is important to note that an Office for Roma and Egyptians has been established within the Local Secretariat for Social Welfare<sup>14</sup>. The office addresses a wide range of issues and challenges faced by these communities. In addition, this municipal body implements ongoing activities aimed at preparing children and young people from Roma and Egyptian communities for employment, including the provision of skills training and the organisation of workshops. A portion of the Roma and Egyptian population is traditionally employed in municipal companies founded by the Municipality of Podgorica — primarily in the public utility companies Čistoća<sup>15</sup> and Zelenilo<sup>16</sup>, — where they work in waste collection and maintenance of green areas.

---

13 This camp has existed since 1999, when it was designated as a location for internally displaced Roma from Kosovo\*.

14 Office for Roma and Egyptians – Secretariat or Social Welfare / Office for Roma and Egyptians, available at: <https://podgorica.me/sekretarijat-za-socijalno-staranje/kancelarija-za-rome-i-egipcane/>.

15 Website of Čistoća company, available at: <https://www.cistoca.me/>.

16 Website of Zelenilo company, available at: <https://www.zelenilo.me/>.



*Figures 3 and 4. Social housing buildings*

## 2. STRUCTURE OF THE STUDY

---

**A**ccording to the 2023 Census, members of the Roma and Egyptian communities in Podgorica, the capital city of Montenegro, were predominantly recorded in the Vrela Ribnička settlement. Accordingly, the first part of this study presents the demographic and socioeconomic characteristics of these populations within the settlement, based on field research findings. The second part explores possibilities for improving the housing conditions of Roma and Egyptians in Podgorica, drawing on interviews conducted with

representatives of the Capital City of Podgorica and the Ministry of Social Welfare, Family and Demography. The third part provides recommendations for a sustainable approach to addressing the housing needs of the Roma and Egyptian communities in Podgorica. It also outlines potential implementation mechanisms for housing-related projects and proposes ways to secure the necessary financial resources. Finally, the fourth part offers a concise overview of the relevant legal and regulatory framework.



### 3. RESEARCH METHODOLOGY

---

As previously stated, the official results of the 2023 Census show that 3,431 Roma and 528 Egyptians were registered in Podgorica. These figures represent 1.91% and 0.29% of the city's total population, respectively, meaning that a total of 3,959 Roma and Egyptians reside in Podgorica.

This research focused on members of the Roma and Egyptian communities living in Podgorica who are not accommodated in the housing units constructed under the IPA Project and the Regional Housing Programme. As previously mentioned, these facilities house approximately 2,000 members of these populations.

The study concentrated on the substandard Vrela Ribnička settlement, located on the outskirts of the formal Konik settlement in Podgorica. Vrela Ribnička represents the only organised Roma settlement in the city.

The sample covered households in need of housing, i.e. those eligible for social housing. This group includ-

ed individuals living in substandard wooden or cardboard structures, those residing in inadequate solid-structure buildings, and persons without ownership of a housing unit who live in rented accommodation.

In total, 172 families were surveyed in Podgorica, comprising 1,021 respondents. The survey was conducted in two phases: November 2024 and May–June 2025. Its objective was to identify and survey all households within the reference settlement that were living in substandard or rented housing.

To better understand the scope and effectiveness of the survey on which this study is based, the following points are important to highlight:

1. Within the Vrela Ribnička settlement, some Roma households declined to participate in the survey, claiming that the buildings they occupy are legalised. According to statements from community members, these families constructed their hous-

ing units several decades ago, and the properties have since been registered in the cadastral records.

2. Certain Roma families whose dwellings were most likely built illegally in the vicinity of the municipal landfill also refused to participate in the survey, primarily due to a lack of trust. These families generally reside in dwellings that are satisfactory in terms of both housing conditions and construction quality.
3. Due to the extensive boundaries of the Vrela Ribnička settlement,

it was challenging to identify individuals who rent barracks or apartments rather than own a housing unit. However, as the survey was conducted in cooperation with members of the Roma and Egyptian communities, their knowledge of the local population and terrain proved invaluable in identifying this category of respondents.

The final sample included households in need of a housing solution, specifically those eligible for social housing.



*Figures 5 and 6. View of substandard solid-structure housing units*

## 4. ASSESSMENT OF THE LEGAL FRAMEWORK

---

The National Housing Strategy for the period 2011–2020<sup>17</sup>, which incorporated social housing as a core element, defined the fundamental principles of dignified housing in Montenegro. Meanwhile, the competencies of local self-governments were specified through the adoption of the Law on Social Housing in 2013<sup>18</sup> and the Social Housing Programme 2017–2021<sup>19</sup>. Through these mechanisms, socially vulnerable and disadvantaged population groups in need of social housing have been linked to the state's housing policy, with a focus on cohesion and inclusion policies.

As the overarching legal document, the Law on Social Housing defines social housing as 'housing of a certain standard, provided to individuals or households unable to resolve

their housing needs due to social, economic or other reasons'. According to this law, individuals who do not own an apartment or other residential property, whose housing units do not meet adequate standards and who cannot secure housing from their current income may exercise their right to social housing. This right can be exercised by Montenegrin citizens who are permanently resident in Montenegro and meet the legal requirements, as well as by foreign nationals and stateless persons whose legal status is regulated by law or an international agreement.

The law stipulates that the right to social housing is given priority to Roma and Egyptians, among other categories, as well as to displaced persons and to internally displaced persons

---

17 National Housing Strategy of Montenegro for the Period 2011–2020 with a Framework Action Plan for the Period 2011–2012, Ministry of Spatial Planning, Urbanism and State Property, 02 November 2011, available at: <https://www.gov.me/dokumenta/01619109-50a8-4896-a83b-59832fd8b85f>.

18 Law on Social Housing – Official Gazette of Montenegro, No35/13 of July 2013, Ministry of Spatial Planning, Urbanism and State Property, 07 September 2013, available at: <https://www.gov.me/dokumenta/690dc9d0-c76c-488d-85da-226d35f7665c>.

19 Social Housing Programme for the Period 2017–2020, Ministry of Sustainable Development and Tourism, August 2018, available at: [https://www.ucg.ac.me/skladiste/blog\\_22078/objava\\_70315/fajlovi/Program%20socijalnog%20stanovanja%202017\\_2020.pdf](https://www.ucg.ac.me/skladiste/blog_22078/objava_70315/fajlovi/Program%20socijalnog%20stanovanja%202017_2020.pdf).

from Kosovo\* residing in Montenegro. It also applies to foreigners with permanent or temporary residence whose status as displaced or internally displaced persons has been recognised.

According to this law, a family household is defined as all individuals residing with the head of the household, including their spouse or civil partner, children born within or outside of marriage, adopted children, stepchildren and other individuals financially supported by the head of the household or their spouse.

Regarding the financing of social housing, the law stipulates that the state may secure funds from the budget, as well as through donations. Criteria for utilisation are determined by the government and local self-government units. Social housing can be provided by constructing residential buildings, allocating land for construction, providing building materials and granting subsidies, in accordance with the law.

The law also sets out the procedure for leasing and allocating these apartments and prohibits their purchase, inheritance, rental and transfer of ownership.

In 2018, the Government of Montenegro adopted the Regulation on

the Manner and Criteria for Using Social Housing Funds<sup>20</sup>, which stipulates that funds for developing social housing projects of state interest shall be allocated if: the project includes a Social Housing Programme; the programme identifies housing needs; necessary financial resources are secured; and the local self-government participates in financing. The target group and number of beneficiaries for each project are also defined.

Funds for projects of interest to local self-governing bodies are allocated if:

- the project is included in the local social housing programme,
- the need for social housing has been established,
- the target group and number of beneficiaries have been defined,
- necessary financial resources have been secured.

According to Article 6 of the Law on Social Housing<sup>21</sup>, the Capital City of Podgorica should adopt a Local Social Housing Programme on an annual basis. The Decision on adopting the Local Social Housing Programme for Podgorica was made in 2022.

Local programmes define target groups that include Roma and Egyptians; however, none of the local

---

20 Regulation on the Method and Criteria for the Use of Funds for Social Housing, Ministry of Spatial Planning, Urbanism and State Property, 10 July 2019, available at: <https://www.gov.me/dokumenta/fe373e73-aa07-4208-b381-2d12a128e7ad>.

21 Law on Social Housing, Ministry of Spatial Planning, Urbanism and State Property, 19 February 2014, available at: <https://www.gov.me/dokumenta/f576d1cd-ce10-406e-9c46-82848412c552>.



self-governments in Montenegro have addressed this issue to an extent that corresponds to the needs identified by the research. During interviews, representatives of local authorities acknowledged challenges and priorities similar to those highlighted in the study.

It is important to emphasise that programmes and decisions are subject to regular parliamentary amendments at the local level in response to new circumstances, creating conditions that could permanently resolve the housing issues faced by the Roma and Egyptian communities in Podgorica.

Based on the above, it can be concluded that Montenegro's existing legal framework provides an opportunity to implement the proposed project of adapting existing facilities (collective centres), which would provide a long-term solution to the housing issues faced by the Roma and Egyptian communities in Podgorica.



## 5. DEMOGRAPHIC AND SOCIO-ECONOMIC CHARACTERISTICS OF ROMA AND EGYPTIANS IN PODGORICA

---

**T**his chapter presents the demographic and socio-economic characteristics of the Roma and Egyptian communities residing in Podgorica, as identified through field research. This information will serve as a basis for developing strategies to improve the housing situation of these communities.

### 5.1. Gender structure and household size

Regarding the gender composition of Roma and Egyptian families living in Podgorica, most consist of large, multi-generational households with an average of 5.94 members — 3.05 male and 2.89 female. The research indicates that most families have between five and nine members; specifically, 82 of the 172 surveyed families fall into this category. Households with three to four members were recorded in 47 cases, while 28 families had nine or more members.

The smallest household size of up to two members was recorded in only 15 families.

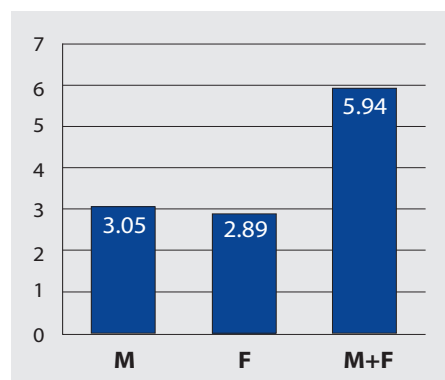


Chart 1. *Gender structure per household among the Roma and Egyptian population in Podgorica*

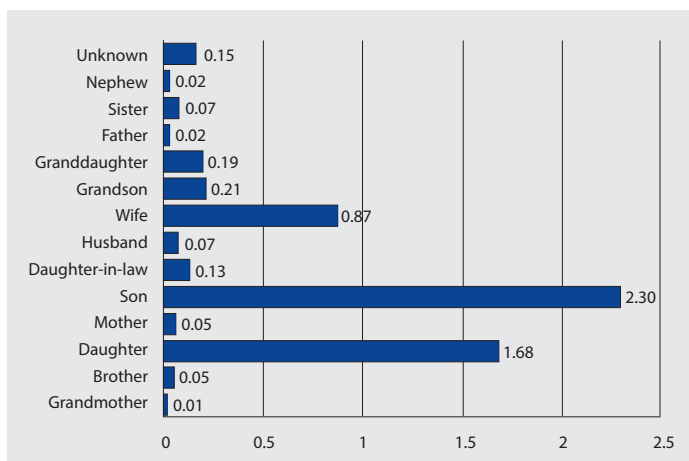


Chart 2. *Number of household members*

## 5.2. PERSONAL DOCUMENTS

When it comes to personal documents, 93% of respondents have them, while 7% do not.

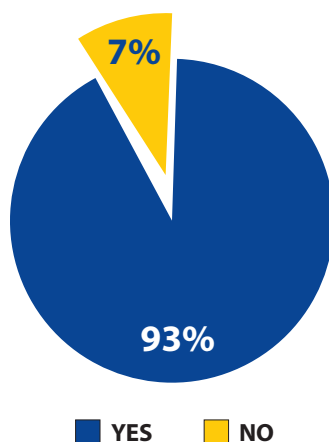


Chart 3. *Personal documents*

According to the research findings, 48% of respondents hold Montenegrin citizenship, while 52% do not. Among those without Montenegrin citizenship, 33% possess a permanent residence permit, whereas 67% do not.

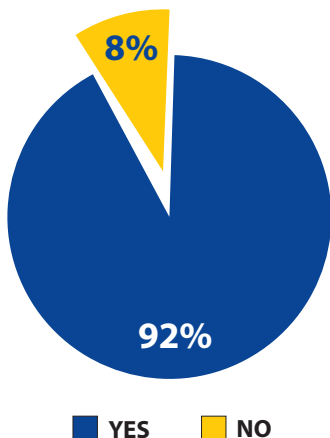


Chart 4. *Birth registry*

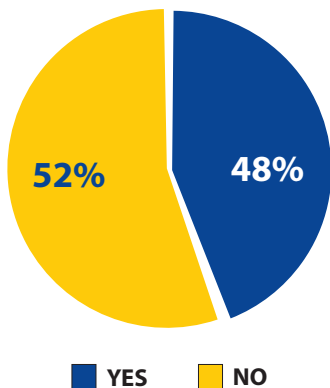


Chart 5. *Montenegrin citizenship*

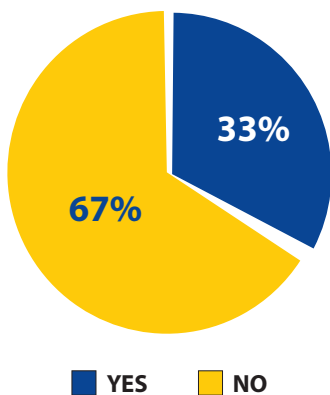


Chart 6. *Permanent residence permit*

Only 13% of respondents have a temporary residence permit. In addition, 60% of respondents possess a passport, while 40% do not hold this travel document.

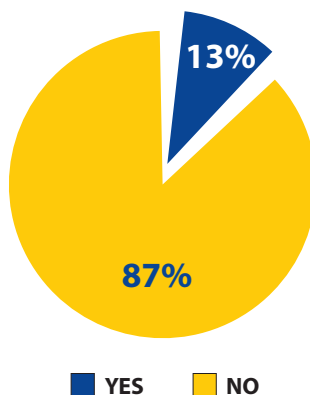


Chart 7. *Temporary Residence Permit*

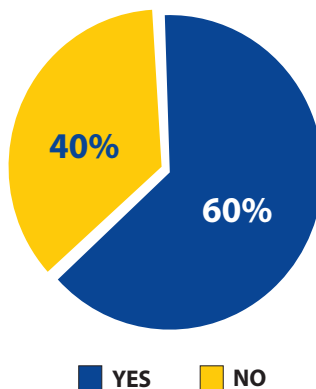


Chart 8. *Travel Document – Passport*

The majority of the population of this settlement (71.11%) are from Kosovo. The remaining 24.19% are local residents, while 3.92% are originally from Serbia.

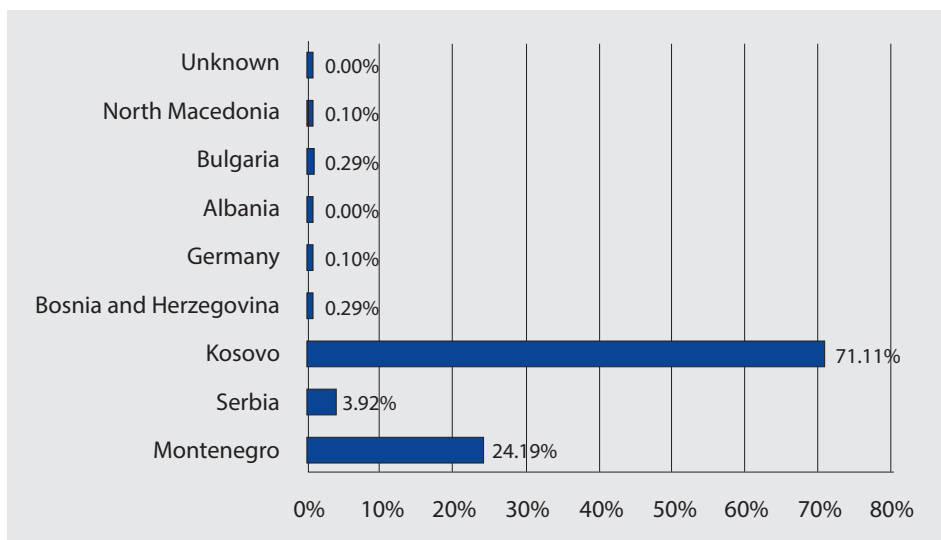


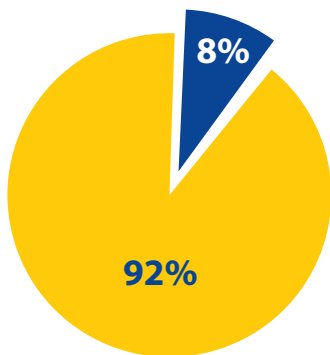
Chart 9. *Place of Origin*

### 5.3. POVERTY

The research revealed a significant level of poverty within the Roma and Egyptian communities in Podgorica. This poverty is caused by several factors: discrimination and antigypsyism; not being registered with the Employment Agency; low levels of education; underdeveloped professional skills; and large household sizes. For many Roma and Egyptians, activities within the informal economy represent an important and often the only source of income.

Most of the families surveyed, totalling 56, have an income of up to 400 euros. Furthermore, 55 families reported an income between 400 and 600 euros, and 44 families earned between 600 and 800 euros. Only 17 surveyed families have an income exceeding 800 euros.

A significant number of households also rely on social assistance as a key source of income.

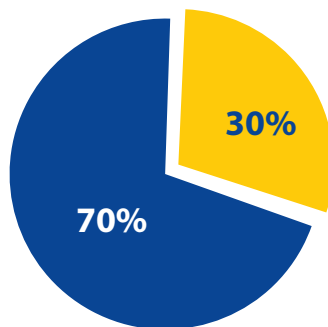


■ YES ■ NO

Chart 10.

*Percentage of respondents receiving care and assistance allowance*

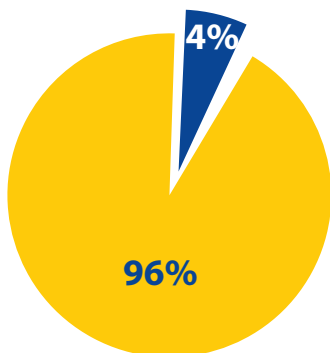
tioned above is presented in the following charts.



■ YES ■ NO

Charts 12.

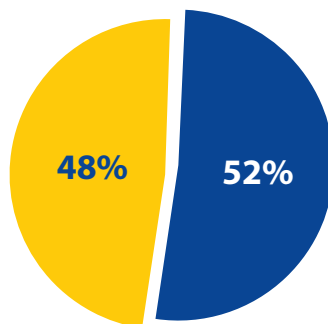
*Percentage of recipients of family material support*



■ YES ■ NO

Charts 11.

*Percentage of personal disability benefits*



■ YES ■ NO

Charts 13.

*Percentage of those registered with the Employment Agency*

Among the respondents, 96% stated that they do not receive the personal disability benefit. Eight per cent of respondents are recipients of the care and assistance allowance, while 47 per cent are recipients of family material support. Of those of working age, 52% are registered with the Employment Agency. The data men-

## 5.4. HOUSING

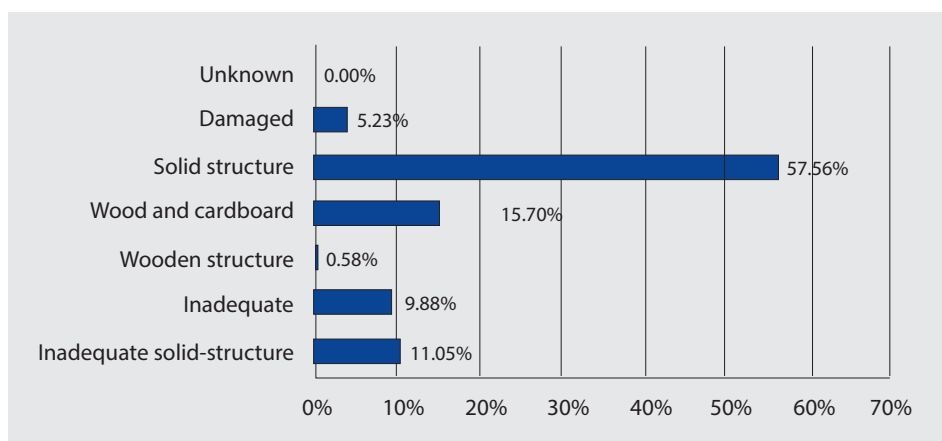
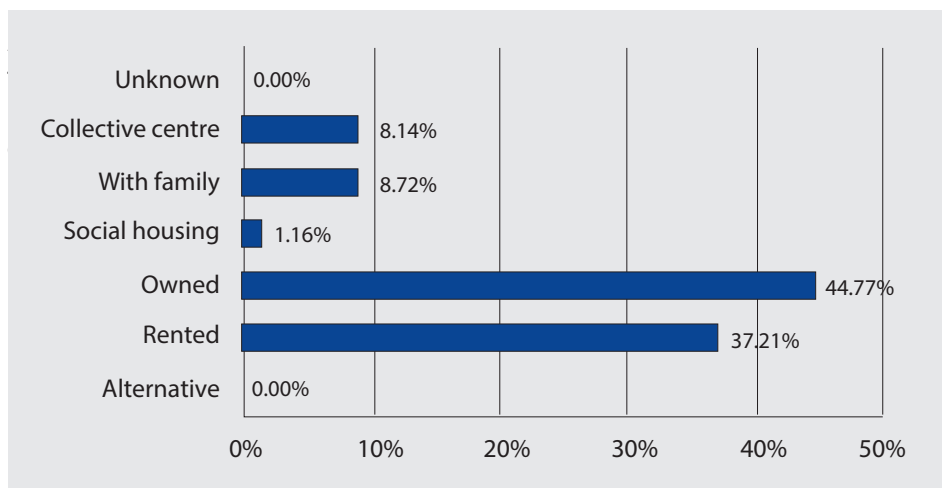


Chart 15. *Condition of housing units*

In addition to the type and condition of housing, Chart 15 also presents the method of heating. It was recorded that one household in this settlement in Podgorica has no heating, two households use electric heating, while the remaining 169 households use wood for heating.



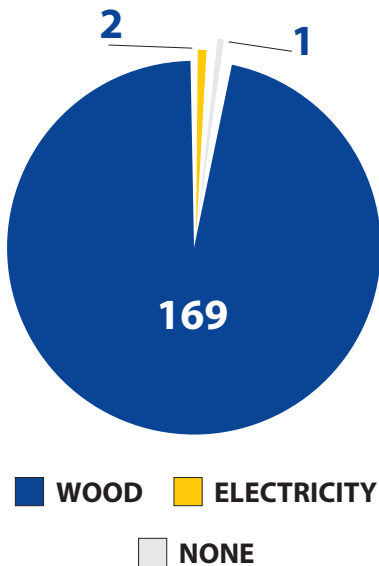


Chart 16. Method of heating

As part of the conducted research, 81% of respondents stated that they have been residing in Podgorica for more than 10 years, while a notable 19% of families have been living there for over 35 years and consider themselves to be local (domicile) families.

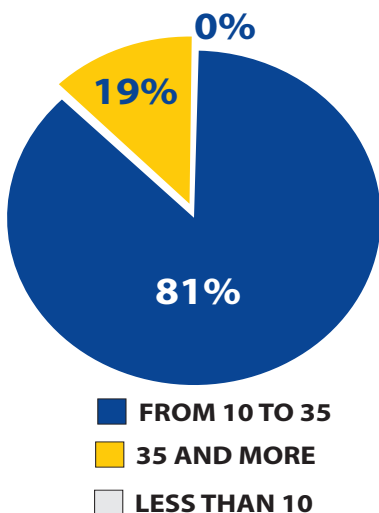


Chart 17. Length of residence in Montenegro

The research surveyed people living in partially or completely inadequate housing. When asked whether they would agree to move to another settlement, if necessary, all respondents answered "yes."

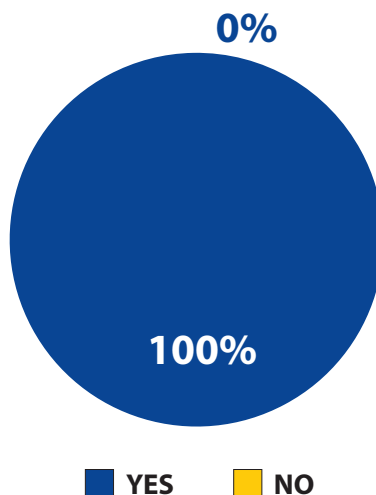


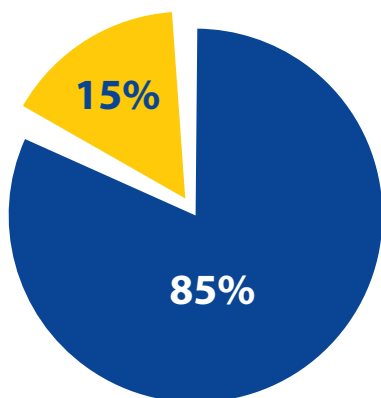
Chart 18. Willingness to Relocate – 100% Positive Response

## 5.5. EDUCATION

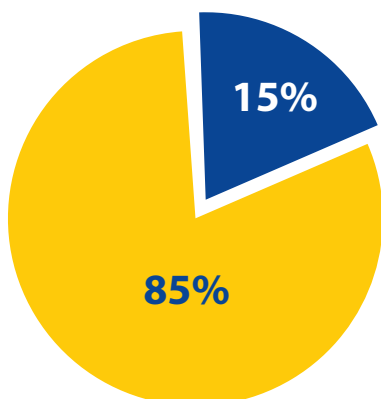
This research also recorded children under the age of 15 and their status regarding school and preschool education. According to the collected data, 85% of households stated that their children attend school, while 15% of households reported that at least one child older than six years does not attend primary education.

When it comes to preschool education, only 15% of households reported that their children attended pre-

school institutions, while 85% said that their children did not attend any such facilities.



■ YES    ■ NO



■ YES    ■ NO

Charts 19 and 20.  
*Status of school and preschool  
education among Roma and  
Egyptian children*

## 6. ANALYSED POSSIBILITIES FOR ADDRESSING THE HOUSING NEEDS OF ROMA AND EGYPTIANS IN THE MUNICIPALITY OF PODGORICA

---

**T**he possibilities and recommendations for addressing the housing needs of the Roma and Egyptian communities in Podgorica were considered through interviews with the following representatives of the Municipality: Milica Kadović (Director of the Property Directorate of the Capital City of Podgorica), Stefan Vešović (Secretary of the Secretariat for Social Welfare of the Capital City) and Radmila Maljević (Head of the Department for Legalisation and Construction within the Secretariat for Urban Planning and Spatial Development). To gain a broader understanding of the situation of these populations, a discussion was also held with Budimirka Đukanović, Head of the Directorate for the Protection of Vulnerable Groups, Ministry for Social Welfare, Family Care and Demography of Montenegro. Following these interviews, potential solutions are elaborated in the sections below.

### 6.1. Legalisation of residential buildings in Roma settlements in Podgorica

Following discussions with Ms Radmila Maljević and other representatives of the local self-government of Podgorica, it was determined that it is not possible to legalise most buildings constructed within the Vrela Ribnička settlement territory for the following reasons: The area in which these buildings were constructed is not covered by a valid Detailed Urban Plan or any other detailed planning document.

1. According to the current Spatial Urban Plan for this part of Podgorica, the area with the highest concentration of these buildings is designated for landscaping and future urban expansion.
2. In addition to these urban planning reasons, the legalisation of the buildings is also hindered by

their non-compliance with basic urban planning parameters and the requirements of the applicable planning documents.

3. Furthermore, the buildings were constructed too close to one another and to public roads. Their structural stability is questionable, they do not meet fire safety standards, and they face several other technical deficiencies.

Based on the above, it can be concluded that these buildings cannot be legalised under the current Law on Legalisation. For the purpose of constructing residential buildings within the IPA Programme and the RHP Project, the Assembly of the Capital City of Podgorica adopted the Detailed Urban Plan for Konik – Vrela Ribnička 2. This plan includes a narrow area of land where the mentioned buildings are located, as well as eight buildings that were previously inhabited by displaced persons from Bosnia and Herzegovina. These buildings are now mostly occupied by members of the Roma community without legal entitlement. They will be further examined as a potential resource for addressing the housing needs of the Roma and Egyptian communities.



Figures 7 and 8.

*Buildings previously inhabited by displaced persons from Bosnia and Herzegovina, now largely occupied by members of the Roma population without legal basis*

## **6.2. Possibility of allocating construction land**

During discussions with the Executive Director of the Property Directorate of the Capital City of Podgorica, it was stated that the city currently possesses a very limited number of land plots under its ownership. These plots are subject to significant demand, with numerous requests submitted by various entities, particularly trade unions

representing employees of municipal and state institutions.

According to the information obtained, it is highly unlikely that the Capital City will approve the allocation of a construction plot for social housing for the Roma and Egyptian communities in the near future or undertake the necessary communal and infrastructure works on such a plot.

### **6.3. Adaptation of existing residential buildings**

However, the authorities hold a different position regarding the collective social housing facilities built in the Vrela Ribnička area in 1994. As previously noted, these buildings were constructed to accommodate displaced persons from Bosnia and Herzegovina and were used by these families until mid-2023, when 96 housing units built under the RHP programme were allocated to them. The facilities consist of eight single-storey pavilions, each with a ground floor and one upper floor, covering a base area of between 400 m<sup>2</sup> and 500 m<sup>2</sup>. According to earlier Red Cross data, these facilities contained around 200 housing units and were home to more than 100 families; however, no precise records were ever established. The buildings are arranged so that two families share one common bathroom. They are currently in very poor condition and require significant investment

to be brought up to an acceptable standard.

The Property Directorate of the Capital City stated that it would consider the possibility of adapting these buildings favourably and would grant consent should the need arise. It was also noted that the facilities already have existing communal infrastructure, which would simplify the process. According to the information obtained, three of the eight buildings were recently transferred to the Ministry of Labour and Social Welfare, while the other five remain under the administration of the Capital City. Discussions with representatives of the Ministry clarified that the three buildings transferred to the Ministry are intended for establishing offices and services to support members of the Roma and Egyptian communities. However, no concrete steps have yet been taken to implement this plan. Over the past two years, these facilities have been illegally occupied by members of the Roma and Egyptian populations. In some cases, families who previously lived in these buildings have retained them and continue to use them in addition to the social housing units they were officially allocated.



## 7. PROPOSED SOLUTIONS TO ADDRESS THE HOUSING SITUATION OF ROMA AND EGYPTIANS IN PODGORICA

---

**T**his study aims to improve the housing conditions of the Roma and Egyptian communities in Podgorica. Based on discussions with representatives of the Capital City and a review of the existing urban planning framework and available construction plots, it was concluded that the only feasible option to achieve the study's objective is to adapt five existing buildings in the Vrela Ribnička settlement to accommodate members of the Roma and Egyptian communities. These buildings were previously used to house displaced persons from Bosnia and Herzegovina.

As previously stated, eight buildings are located in this area on the following cadastral plots: 7974, 7976, 7977, 7978, 7979, 7980, 7983 and 7985. All plots are within the Podgorica III cadastral municipality. On 18 September 2023, the Capital City of Podgorica and the Ministry of Labour and Social Welfare signed a Memorandum of Cooperation for three of these buildings, located on plots 7976, 7977 and 7978. This memorandum plans the reconstruction of these buildings

to provide facilities for the Red Cross office and social and child protection services, as well as accommodation for ten displaced families and five families relocated by the Capital City of Podgorica. In addition, it foresees the provision of housing for unaccompanied Ukrainian children.

The remaining five buildings are owned by the capital city of Podgorica and are not subject to any agreements. According to cadastral records, the buildings consist of a ground floor and one upper floor, with a base area ranging between 380 and 510 square metres. A potential obstacle to adapting these buildings is that many of the units have already been illegally occupied, meaning the housing units are currently in use. Notably, two housing units previously shared one bathroom. Based on the site assessment, the structure of one of the buildings is as follows: twenty-four housing units, each ranging from 26 to 33 square metres, and twelve bathrooms, each measuring approximately four-square metres.

## 7.1. TABLE OF COSTS – ADAPTATION OF EXISTING RESIDENTIAL BUILDINGS IN THE VRELA RIBNIČKA SETTLEMENT

1. In cooperation with a company founded by the capital city of Podgorica, the approximate costs of adapting a single housing unit and bathroom were calculated. Based on this, the total adaptation costs for an entire building were estimated using a proportional method, to which facade renovation costs were added. Due to fluctuations in market prices, a deviation of up to 10% from the estimated costs per building is possible, as shown in the table.

2. Adaptation cost table for a smaller-sized building (approximately 400 square meters):

Description of works per housing unit and total cost:
- Demolition works and removal of debris
- Floor preparation and ceramic tile installation with adhesive
- Wall preparation and ceramic tile installation with adhesive
- Scraping, plastering, sanding, and final painting of walls and ceilings (2 coats)
- Installation of electrical circuits (strong and weak current), lighting installation with procurement and installation of materials
- Installation of water supply and sewage network in the kitchen
- Installation of entrance doors and facade windows
Installation of interior doors
<b>TOTAL COST PER HOUSING UNIT: €6,500.00 + VAT</b> Since each building contains 24 housing units, the total adaptation cost per building is: <b>24 x €6,500.00 = €156,000.00 + VAT</b>

Description of works per bathroom and total cost:
- Demolition works and removal of debris
- Floor preparation and ceramic tile installation with adhesive



- Wall preparation and ceramic tile installation with adhesive
- Scraping, plastering, sanding, and final painting of walls and ceilings (2 coats)
- Installation of electrical circuits (strong and weak current), lighting installation with procurement and installation of materials
- Installation of water supply and sewage network in the kitchen
- Installation of waterproofing system
<b>TOTAL COST PER BATHROOM: €2,000.00 + VAT</b> Since each building contains 12 bathrooms, the total adaptation cost for bathrooms per building is: <b>12 x €2,000.00 = €24,000.00 + VAT</b>

#### **Description of facade works and total cost:**

- Scaffolding installation
- Surface preparation of facade
- Installation of 5cm thermal insulation system (demit system)
- Application of adhesive mesh and decorative plaster finish
<b>TOTAL COST PER BUILDING: €28,000.00 + VAT</b>

#### **Description of roof works and total cost:**

- Dismantling of roofing sheets, battens, and wooden structure
- Construction of new roof structure, installation of battens, flashing, gutters, and roof tiles
<b>TOTAL COST PER BUILDING: €25,000.00 + VAT</b>

\*TOTAL COST OF ADAPTING A SMALLER-SIZED BUILDING  
(approx. 400 m<sup>2</sup>):

Description of works:	Cost:
Works in all housing units	€156.000,00 + VAT.
Works in all bathrooms	€24.000,00 + VAT.
Works on the facade	€28.000,00 + VAT.
Works on the roof	€25.000,00 + VAT.
<b>TOTAL:</b>	<b>233.000,00 + VAT.</b>

\*TOTAL COST OF ADAPTING A LARGER-SIZED BUILDING  
(approx. 500 m<sup>2</sup>):

Description of works:	Cost:
Works in all housing units	€176.000,00 + VAT.
Works in all bathrooms	€24.000,00 + VAT.
Works on the facade	€36.000,00 + VAT.
Works on the roof	€30.000,00 + VAT.
<b>TOTAL:</b>	<b>€266.000,00 + VAT.</b>

\*TOTAL COST TABLE FOR ADAPTING ALL 5 BUILDINGS:

Smaller buildings (3 units)	Large buildings (2 units)	Total:
<b>3 x €233.000,00 + VAT = €699.000,00 + VAT</b>	<b>2 x €266.000,00 + VAT = €532.000,00 + VAT</b>	<b>€1.231.000,00 + VAT</b>

# 8

## 8. RECOMMENDATIONS FOR IMPROVING LIVING CONDITIONS AND SOCIAL INCLUSION OF ROMA AND EGYPTIANS IN PODGORICA

---

**B**uilding on the key findings presented in the previous chapters, the following recommendations aim to improve the housing, social, and economic conditions of Roma and Egyptians in Podgorica, as well as strengthen their overall social inclusion:

- Further enhance investment in social housing through the preparation of new project proposals and the use of available national and international funding mechanisms, ensuring that future housing solutions are grounded in the proven models and practices developed through the IPA and RHP programmes.
- Strengthen existing employment programmes by introducing certified vocational training, and enhancing cooperation with the private sector, NGOs, and youth-oriented apprenticeship schemes to ensure sustainable integration into the labour market.
- Prioritise the development of long-term and adequate housing solutions for households living in substandard conditions by accelerating the planning and construction of new social housing units, improving temporary accommodation, and establishing capacities for the urgent relocation of the most vulnerable families.
- Implement continuous education support programmes, including remedial classes, mentorship, parent-engagement initiatives, and strengthening the role of Roma mediators, with the aim of systematically reducing school dropout rates.
- Ensure stable and long-term funding for legal assistance to support members of the Roma and Egyptian communities in obtaining residence permits, personal documentation, and

citizenship, and formalise cooperation between the Capital City, the NGO sector, and the Ministry of the Interior.

- Introduce targeted measures for the economic empowerment of women from the Roma and Egyptian communities, including support for entrepreneurship, micro-grants, subsidised employment, and flexible training programmes adapted to childcare responsibilities.
- Develop and implement periodic, multilingual information campaigns on available healthcare services, focusing on primary healthcare, preventive examinations, reproductive health, vaccination, and maternal and child health, in cooperation with Roma mediators and local health centres.
- Initiate the revision or development of detailed urban plans that would enable the legalisation of buildings inhabited by members of the Roma and Egyptian communities in the Vrela Ribnička area.
- Strengthen interinstitutional coordination to identify additional locations suitable for social housing, and develop a long-term strategy for the management of construction land in line with estimated housing needs.
- Conduct a technical assessment of former collective centre facilities to determine their suitability, capacity, and adaptation costs, and develop a clear action plan

for their controlled conversion into social housing or community service centres.

## 9. CONCLUSION

---

Taking into account the research conducted, and the statistical data presented in this study, as well as discussions with representatives of the capital city of Podgorica and previously implemented projects, the following conclusions can be drawn:

- One of the key findings is that over the past decade, housing conditions for the Roma and Egyptian populations in Podgorica have significantly improved, primarily through the construction of 22 social housing facilities funded by IPA projects and the Regional Housing Programme (RHP).
- The analysis indicates that the regular employability workshops organised by local government bodies — particularly the Secretariat for Social Welfare — represent a key measure contributing to the enhancement of skills and labour-market readiness among Roma and Egyptian community members, especially young people.
- Despite progress, a significant number of Roma and Egyptian families (more than one thousand individuals) continue to live in substandard housing conditions that are often close to inhumane. It is therefore essential to improve these living conditions and provide permanent housing solutions.
- Campaigns supporting Roma children within the education system must be conducted continuously in order to reduce school dropout rates.
- It is necessary to ensure continuous legal support for obtaining both permanent and temporary residence permits, as well as citizenship, in accordance with the applicable Law on Foreigners.
- It is necessary to continue implementing measures that promote the inclusion of the Roma and Egyptian communities in the labour market, with a particular focus on supporting female community members.
- Information campaigns should be carried out regularly to raise awareness of the healthcare services available and how to access them.
- The analysis of the current urban planning documents demonstrates that the legalisation of

buildings constructed by the Roma and Egyptian communities in Podgorica, especially in the Vrela Ribnička area, is not permitted under the existing planning and regulatory framework.

- The limited number of land plots available to the Capital City of Podgorica indicates that the local administration will face significant challenges in the future when allocating and developing construction land for social housing intended for the Roma and Egyptian populations.
- A potential solution to the sub-standard housing situation faced by the Roma and Egyptian communities in Montenegro could be to adapt facilities that were previously occupied by displaced persons from Bosnia and Herzegovina. The municipality does not possess precise information on the capacity of these facilities. According to unofficial data, all eight facilities could accommodate around 200 families. Notably, the capital city of Podgorica has allocated three of the eight facilities to the Ministry of Labour and Social Welfare to establish offices and services to support the Roma and Egyptian communities. However, no concrete action has yet been taken on this issue, resulting in unauthorised occupancy, primarily by members of the Roma and Egyptian populations.

A detailed analysis of the collected data, conducted interviews, and evaluation of existing projects show that significant progress has been achieved in improving the quality of life of the Roma and Egyptian communities in Podgorica over the past decade particularly through social housing initiatives and the active involvement of local institutions. However, the measures currently in place remain insufficient to address the serious and complex challenges these communities continue to face.

This underscores the need for systemic solutions and urgent strategic interventions. Achieving lasting and sustainable results requires a coordinated and integrated approach involving state institutions, local authorities, international partners, and civil society. Such an approach should aim to ensure the full inclusion of Roma and Egyptians by addressing key areas such as housing, education, employment, healthcare, and legal status. Special attention should be given to the most vulnerable groups within the community — women, children, and young people.



The Member States of the European Union have decided to link together their know-how, resources and destinies. Together, they have built a zone of stability, democracy and sustainable development whilst maintaining cultural diversity, tolerance and individual freedoms. The European Union is committed to sharing its achievements and its values with countries and peoples beyond its borders.

**[www.europa.eu](http://www.europa.eu)**

The Council of Europe is the continent's leading human rights organisation. It comprises 46 member states, including all members of the European Union. All Council of Europe member states have signed up to the European Convention on Human Rights, a treaty designed to protect human rights, democracy and the rule of law. The European Court of Human Rights oversees the implementation of the Convention in the member states.

**[www.coe.int](http://www.coe.int)**

Co-funded  
by the European Union



EUROPEAN UNION

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

Co-funded and implemented  
by the Council of Europe