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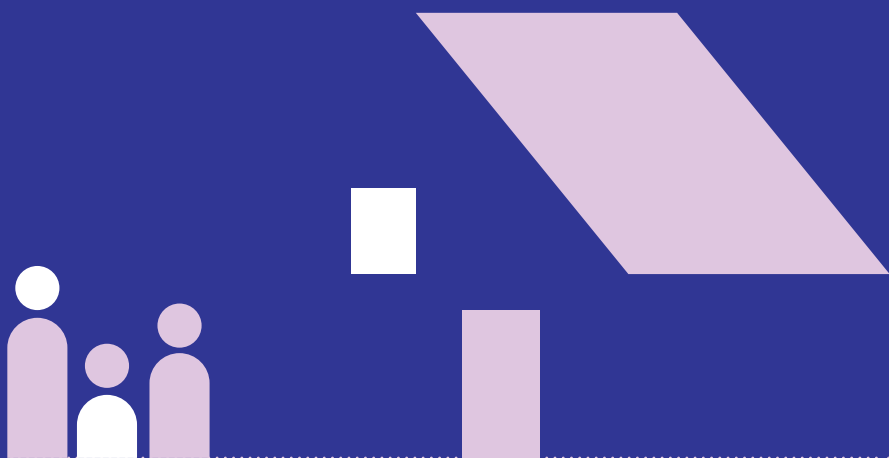


INITIATIVE FOR
ECONOMIC AND
SOCIAL RIGHTS



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ЗА ТЕБЕ

Unaffordability of Social Housing in Belgrade: From the Burden of Housing Costs to Spatial Segregation



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Introduction

“The Rent Eats First”¹ perhaps best captures the reality of most people’s everyday lives, regardless of their housing status — whether they rent privately, live with their parents, have built their own home, or benefit from a social housing support program. Housing costs constitute the largest single household expense and almost always take precedence over all other needs, as having a place to live is essential for earning income, accessing health care and education, and exercising all other rights.²

Yet, what does it actually mean when we say that housing is “the largest household expense”? Does it take up one third, half, or such a large share of the household budget that there is little left for food, medicine, or other urgent necessities? In the latter case, households face an impossible choice between paying rent, utilities, and electricity bills, or feeding their children, providing warm clothing, or securing adequate medical care for those who are ill. Beneficiaries of social housing in Serbia face such choices on a daily basis. Data show that every second person in the lowest income brackets (the first two income deciles) is overburdened with housing costs and, as a result, lives in overcrowded conditions.³ In situations of intergenerational poverty, housing expenses — including those in social housing — are often so high that they lead to chronic arrears in utility payments and undermine the satisfaction of other essential needs.⁴ Faced with competing basic necessities, families are unable to meet all imposed costs regularly, running the risk of losing their homes. This is the lived reality for the majority of socially and economically vulnerable residents, including some beneficiaries of housing support — a paradoxical outcome of a policy that was, ironically, designed to prevent precisely such forms of extreme existential precarity.

1 Title of the Chapter no. 16, M. Desmond, *Evicted: Poverty and Profit in the American City*.

2 Herbert et al., *Measuring Housing Affordability: Addressing the 30 Percent of Income Standard*, p. 3.

3 EUROSTAT data for 2024 (Note: Housing cost overburden refers to a situation in which more than 40% of the household’s budget is spent on housing-related expenses). Source: https://ec.europa.eu/eurostat/databrowser/view/tessi162/default/table?lang=en&category=t_ilc.t_ilc_lv.t_ilc_lvho.t_ilc_lvho_hc

4 Vuksanović-Macura, “*Social Housing in Serbia and Roma*” p. 68. As stated in the Revised Strategy for the Social Inclusion of Roma 2022–2030, intergenerational poverty, very low income levels, and weak employment prospects represent additional barriers preventing Roma men and women from realizing their right to adequate housing conditions. Housing costs (including those in social housing units) are often so high that they jeopardize the fulfillment of other essential needs or result in significant debts for electricity, utilities, heating, and similar expenses. Due to this indebtedness, they are under constant threat of eviction from their homes (pp. 51, 59).

Who bears responsibility? Contrary to the dominant trend of individualizing responsibility imposed by neoliberal capitalism, this is undoubtedly a systemic failure and neglect. The greatest responsibility lies with the state itself, which designs and implements social, financial, urban, and housing policies whose outcomes continually perpetuate inequality, insecurity, and social and housing deprivation among certain population groups. As highlighted by the United Nations Special Rapporteur on the Right to Adequate Housing in the 2023 report, the chronic lack of affordable housing stems from a misguided belief in market self-sufficiency without responsible State intervention, a notable decline in public housing provision, diminished public support for enabling low- and middle-income families to secure suitable housing, inadequate legal safeguards for tenants (both in the private rental sector and within housing support programs), escalated housing and land speculation, and the financialization of housing.⁵ In all these processes, the state plays a decisive role — through the adoption of laws and procedures, the monitoring of their implementation, and through the political will to address (or disregard) systemic problems. Housing unaffordability, particularly among the most vulnerable groups, remains far from the list of priorities for both national and local governments in Serbia. Instead, the problem continues to deepen and expand over time.



In recent years, a number of analyses in Serbia have explored various structural challenges within social housing policies and support mechanisms for the most vulnerable population groups — addressing issues such as the treatment of social housing in urban planning⁶, the different housing support models applied in Serbia and their respective analyses⁷, housing conditions of Roma communities as a particularly vulnerable group among the beneficiaries of social support programs⁸, and the spatial segregation of (social) housing⁹. Insights from field research conducted by the A11 – Initiative for Economic and Social Rights (hereinafter: the A11 Initiative) reveal numerous

5 UN, *A place to live in dignity for all: make housing affordable*, p. 3.

6 Vuksanović-Macura et al., *The Role of Urban Plans in Social Housing Provision in Serbia*

7 Mojović et al., *Construction of New Housing for Low-Income Refugees and Other Housing-Vulnerable Individuals*, Vuksanović-Macura et al., *Social Housing in Serbia: Alternative Models Available to the Most Vulnerable Families and Discriminated Women*

8 Vuksanović-Macura, *Social Housing and Roma*

9 Ćurčić et al., *Residential and Spatial Segregation and the Right to Adequate Housing*; Timotijević et al., *What We Mean when We Say ... Against Housing Segregation*

testimonies and experiences of social housing beneficiaries, indicating that, despite formally securing the right to housing support, they continue to face significant debts, the risk of eviction, and even homelessness. This report builds upon previous efforts; however, in an attempt to provide a complementary perspective, it focuses specifically on the narrower issue of social housing unaffordability. We aim to examine unaffordability from multiple angles in order to gain a more comprehensive understanding of all contributing factors, ultimately supporting advocacy for potential measures and policies that could help reverse the current trends in this area.

In addition to an analysis of relevant literature and existing research, domestic and international legislative documents (laws, regulations, decisions, etc.) from the perspective of housing affordability, as well as (limited) publicly available data in Serbia, this paper also draws on information obtained through interviews conducted by the A11 Initiative with residents of the Kamendin and Zemun Polje neighborhoods in Belgrade — the largest social housing complexes in Serbia¹⁰, as well as other insights collected by the organization during its fieldwork.

The synthesis of collected data was conducted on two complementary levels:

- **City-level analysis** – examining how spatial segregation affects access to basic public services (healthcare, education, transport, employment), and how the distance and isolation of locations further increase everyday living costs;
- **Housing unit-level analysis** – assessing the relationship between specific economic conditions of housing (rent levels, utility costs, taxes, etc.) and the actual income of residents (financial social assistance, irregular earnings, precarious employment), as well as identifying systemic barriers (e.g., loss of subsidies during months without entitlement to social assistance) to achieving secure and affordable social housing.

The findings and conclusions of this report largely rely on data from Belgrade, due to the fact that the regulatory framework for social housing and related social protection measures is the most developed there (though some elements may exist in other local self-government units), as well as

¹⁰ The insights presented in this section are drawn from a discussion with social housing residents in the Kamendin settlement, conducted on 5 June 2025 in Zemun Polje, as documented in the conversation transcript.

because Belgrade hosts the largest examples of social housing. However, the analysis is not limited to Belgrade; findings have been supplemented with data from other cities and municipalities in Serbia in order to provide a more comprehensive picture of the phenomenon of social housing (un)affordability, which is the subject of this report.

At the conclusion of each of the two levels of analysis, general recommendations will be offered for improving both the regulatory framework and the implementation of relevant public policies. These recommendations are short-term and focused on existing frameworks and possibilities, reflecting the need for tangible progress in the field of the right to adequate and secure housing. The horizon for change, however, is much broader and more transformative than the proposed recommendations and entails a reconsideration of the very understanding of social housing, social and housing equity, and justice. Its operationalization, however, is reserved for a separate document.

What do we mean by the affordability of social housing

"...Should we use it for household needs, for food and drink, for the children's clothes, or save it for the electricity bill?"

(a social housing resident,
Požarevac)

1.1. Definition of Social Housing

Looking beyond the national context, it is extremely difficult to identify a single, universally accepted definition of *social housing*, particularly because there is no consistent use of the term *social*¹¹, nor a uniform application with regard to the target groups it covers, or the type of housing ownership included in this social housing policy model. It is also important to emphasize that social housing and social housing policy are not synonymous; social housing is only one of the instruments of social housing policy.¹²

In the local context, the definition of social housing employed in the Law on Social Housing of 2009 (Article 2) can also be found in the earlier publication *Urban Planning Aspects of Social Housing* (2006), which describes it as “housing of an adequate standard provided with state support for those population groups and categories who, due to economic, social, or other reasons and constraints, cannot meet their housing needs on the market and under market conditions.”¹³ The subsequent Law on Housing and Building Maintenance (2016), which repealed the previous legislation, aimed to consolidate various measures, including social housing, under a single concept of *housing support*.¹⁴ Nevertheless, in practice, one particular form of housing support—namely, subsidized rental in publicly owned housing—continued to be formally and informally referred to as social housing.

In this report, the focus will be primarily on the (*social*) *rental housing model*, as it constitutes the most prevalent form of social housing.¹⁵ On one hand, this model involves the rental of publicly owned apartments for a fixed period without the option to purchase, provided to socially vulnerable house-

11 In the literature and public policy documents of other European countries, the terms *social*, *public*, and *affordable* housing are used, often sharing numerous common elements, yet each also exhibits specific characteristics.

12 In the Serbian context, a comparable distinction can be made between social housing and broader housing support, which encompasses a range of models and instruments, of which social rental housing represents only one component. This will be explored in greater detail later in the text.

13 Milić, M., *Urbanistic Aspects of Social Housing*, p 30.

14 According to the Law on Housing and Building Maintenance (Article 92), housing support is provided through five models: 1) apartment rental; 2) purchase or other means of acquiring ownership of an apartment or family house; 3) improvement of housing conditions; 4) assistance with legalizing an apartment or family house; and 5) housing provision.

15 Social rental housing with the option to purchase has been widely applied, particularly in projects offering housing support to refugees and internally displaced persons following the wars of the 1990s.

holds through the *non-profit rental model* and its closely related variant, *social housing under supportive environment* as a social protection service. On the other hand, it encompasses housing allowances, which subsidize the rent of an apartment regardless of the ownership form—whether state-owned, municipality-owned, or privately owned.

This text will primarily focus on ***non-profit rental housing***, under which residents pay subsidized rent (significantly below market rates) from their own income, along with other housing-related costs, including utilities, water supply and sewage, building maintenance, heating, etc., but also electricity supply).¹⁶ The framework for this regime is established by the Law on Housing and Building Maintenance (2016) and forms part of the housing support model within the broader housing policy.

Social Housing in Supportive Environment, by contrast, is defined as a social protection service provided by local governments and regulated by local social protection decisions, such as the *Decision on Social Protection Rights and Services for the City of Belgrade* (2011). Consequently, there are differences in the regulatory framework for this support regime, the conditions for accessing the service, and the authorities responsible for its provision to citizens in need.¹⁷ Although the target group for this model

¹⁶ According to Vuksanović-Macura, between 2004 and 2017, a total of 633 apartments were constructed in Belgrade, of which 626 were rented to housing- and socially vulnerable households. See: Vuksanović-Macura, *Social Housing and Roma*, p. 77.

¹⁷ Article 31 clarifies that this service may be accessed by “socially and housing-deprived persons who are accommodated in collective centers or using other forms of temporary accommodation, provided that household income per member does not exceed the threshold for determining eligibility for financial social assistance for individuals.”

only partially overlaps with that of general housing support¹⁸, it provides somewhat different conditions for the *de facto* rental of publicly owned apartments. As in the previous model, the housing unit cannot be owned by the beneficiary, but opportunities to reduce housing costs are somewhat greater. Tenants do not pay rent, but only housing-related expenses, while additional relief measures are available for vulnerable households.

The paper does not consider subsidized rent—also referred to as **housing allowances**—under any form of housing ownership. To our knowledge, this form of support has not been operationalized by any local self-government unit, and no examples were found in practice regarding the granting of housing allowances or the conditions for obtaining or losing this form of support.¹⁹

1.2. Defining the *Affordability* of Social Housing

Although **affordability of housing** is recognized as one of the key aspects of the right to adequate housing, there is no universally accepted definition. It largely depends on national legislation and judicial practice. Consequently, methodologies for measuring affordability, monitoring strategies, and ef-

18 Under the *Law on Housing and Building Maintenance*, the target groups for housing support are listed (Article 89) as follows: 1) homeless persons; 2) temporarily homeless persons; 3) victims of domestic violence without housing or without adequate housing; 4) persons without housing who are beneficiaries of financial social assistance in accordance with the law governing social protection; 5) persons without housing or adequate housing who have the status of first-category war veterans, as well as beneficiaries of rights under the regulations on veteran and civilian invalid protection; 6) persons without housing or adequate housing who are persons with disabilities; 7) persons without housing or adequate housing who lack sufficient means to secure housing on the market for themselves or their families, or to improve their housing conditions; 8) persons with professions identified as scarce and of interest to a local self-government unit or a state administration body. On the other hand, according to the *Decision on Social Protection Rights and Services* (for the City of Belgrade, Article 31), the Social Housing in Supportive Environment service may be accessed by individuals and families who meet at least one of the following conditions: persons over 65 years of age capable of independent living; members of households with a physical impairment rated between 80% and 100%, in accordance with pension and disability insurance regulations; households including a child with developmental disabilities who is a beneficiary of care-giver allowance on any grounds; single parents; victims of domestic violence.

19 Article 95 of the *Law on Housing and Building Maintenance* states that “the specific conditions and procedures for granting housing allowances shall be determined by a decision of the competent authority of the local self-government unit.” The transitional and final provisions of the Law (Article 136) establish a six-month deadline for the adoption of implementing regulations. To date, there is no evidence that any local self-government unit has adopted such a decision.

fective policy instruments for ensuring affordable housing cannot be equally effective or applicable across all contexts.

According to the 2023 Report of the United Nations Special Rapporteur on the Right to Adequate Housing, housing affordability goes beyond the financial capacity to purchase, rent, or construct a dwelling. Equally relevant for housing policy are costs such as deposits or loan downpayments, as well as essential service expenses including water, sanitation, and energy for heating and cooking.²⁰ Accordingly, when discussing housing costs—particularly in the context of social housing—it is necessary, beyond rent and tax payments (which are addressed separately below), to consider all expenses that make a housing unit truly *habitable*. It is therefore not coincidental that EUROSTAT's indicator, "*housing cost overburden*," is defined as the share of total housing costs in a household's budget, encompassing various fees, such as waste collection, maintenance, and utility services.²¹ As EUROSTAT notes, these are costs "associated with the right to live in a dwelling"

Serbia, like many other European countries, has experienced a steady rise in housing unaffordability over the past two decades. The mass privatization of social housing during the 1990s played a pivotal role in reinstating a capitalist logic in the housing sector throughout the region. The widespread transfer of apartments into private ownership effectively expanded the housing market, while speculative residential construction became a key driver of national economic growth in the absence of industry and viable investment opportunities in the real production sector. According to the 2022 census, 98.86% of apartments in Serbia and 98.33% in Belgrade are privately owned, predominantly on an individual basis. The outcome of this process is what is globally recognized as a *housing crisis*, though, as David

20 UN, *A place to live in dignity for all: make housing affordable*, p. 5.

21 The housing cost overburden rate measures housing affordability as the percentage of the population living in households where the total housing costs ('net' of housing allowances) represent more than 40% of disposable income ('net' of housing allowances). Housing costs refer to the monthly expenditures connected with a household's occupancy of their accommodation. These costs include utilities (water, electricity, gas, heating) based on actual usage. Only costs that are actually paid are considered, regardless of the payer. This includes costs such as structural insurance, mandatory services and fees (e.g., sanitation and waste collection), routine maintenance and repairs, taxes, and utility expenses (water, electricity, gas, and heating). For owners, housing costs encompass mortgage interest payments (net of tax relief and gross housing allowances (i.e., housing allowances should not be deducted from total housing costs). For tenants, the calculation includes gross rent payments (i.e., housing allowances should not be deducted from total housing costs). Source: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:Housing_cost_overburden_rate

Madden and Peter Marcuse²² observe, it cannot be regarded as a temporary anomaly, as the term “crisis” might suggest. Rather, it represents a chronic shortage of affordable, secure, and adequate housing for a growing population, perpetuating and deepening existing housing inequalities while significantly restricting—or in many cases outright preventing—access to other social and economic rights.

Data from the Ministry of Construction, Transport, and Infrastructure²³ indicate that only 10% of the population can afford to purchase or rent a dwelling on the open market without exceeding 40% of their household budget. It is therefore unsurprising that EUROSTAT data show nearly one in two residents of Serbia (46.6%) living in overcrowded housing²⁴, while one in ten households inhabits accommodation with leaking roofs, damp floors, walls, or foundations, or rotting doors and windows.²⁵ Concurrently, weak or inadequate regulation of rental arrangements—whether within housing support programs or on the open market—creates highly precarious conditions for tenants, as rents, terms, and lease durations are often determined arbitrarily.

In such a context of ongoing privatization and the reproduction of privatism²⁶, private ownership of housing is both a product and a mechanism for sustaining the commodification and financialization of housing. This generates an increasing number of housing-vulnerable households, while those same households attempt, by various means, to secure private ownership of (often inadequate) housing units. Paradoxically, in the pursuit of security, many place themselves in even more precarious positions—taking

22 Madden et al, *In Defense of Housing: The Politics of Crisis*.

23 The data originates from 2019 and was taken from the Draft National Housing Strategy, which was open for public consultation in December 2021.

24 The most recent available data are from 2024. Source: https://ec.europa.eu/eurostat/databrowser/view/ilc_lvho05a/default/table?lang=en&category=livcon.ilc.lv.ilc_lvho.ilc_lvho_or

25 The most recent data for this parameter are available from 2023. Source: https://ec.europa.eu/eurostat/databrowser/view/ilc_mdho01/default/table?lang=en&category=livcon.ilc.ilc_md.ilc_mdho

26 The concept of *privatism* was developed by Sonja Hirt. While *privatization* is a socio-economic process with tangible consequences for production or property rights, *privatism*, according to Hirt, represents a dominant cultural regime oriented toward private ownership and the reduction of support for narratives and activities linked to collective goals or models. Although rooted in Western neoliberal economic logic, *privatism* is primarily associated with post-socialist (compressed) transitions that produced a “rise of the private” more dynamic and pronounced than in Western European countries, where the shift toward private ownership was more gradual. See: Hirt, *Iron Curtains: Gates, Suburbs and Privatization of Space in the Post-socialist City*.

out housing loans despite uncertain employment, engaging in other forms of risky indebtedness, or purchasing “affordable” but legally unregulated housing units.

Housing unaffordability is even more pronounced among the most vulnerable population groups, as illustrated by the following data:

2019	2020	2021	2022	2023	2024
63,5	60,1	54,1	50,7	57,0	46,8

Table 1. Housing Cost Overburden at the Level of the Republic of Serbia for the Population Below the Risk-of-Poverty Threshold (60% of the national median equivalized disposable income), EUROSTAT

Faced with unstable and insufficient incomes—whether due to temporary employment or reliance on financial social assistance—households already experiencing social exclusion, housing deprivation, and inability to cover housing costs are forced to live either in extremely inadequate conditions or under constant risk of eviction and homelessness.



Considering the situation in the housing sector — including its impact on the broader population and, in particular, the most vulnerable groups — it is unequivocally recognized at the international level that the state holds primary responsibility for taking measures to improve the housing conditions of its residents. General Comment No. 4 (1991) of the United Nations Committee on Economic, Social, and Cultural Rights explicitly sets out the specific obligations of states regarding the right to adequate housing, including the aspect of housing affordability (paragraph 8 (c)). These obligations include ensuring that housing costs do not undermine other basic needs; aligning housing-related expenses with household income; providing housing subsidies for those without affordable options; and protecting tenants from unjustified rent increases.²⁷ This report seeks to illustrate the extent to which these obligations remain unfulfilled in Serbia. It is hoped that, combined with continued advocacy efforts, this analysis will contribute to meaningful improvements in the housing situation.

27 UN, *A place to live in dignity for all: make housing affordable*, 4.

2

Spatial and Housing Segregation and the Unaffordability of Social Housing / City Level

"...When the children are sick, we have to go all the way to Padinska Skela and take two forms of transport, and it is worst on weekends when buses run infrequently and one has to wait a long time"

(a social housing resident, Jabučki Rit)

Spatial and Housing Segregation. Housing segregation is a widespread phenomenon in contemporary urban development, arising from a market-oriented approach to planning and managing spatial resources, which both produces and reinforces spatial injustice. In principle, segregation can be defined as the spatial distribution—or concentration—of social groups according to particular social characteristics, such as race, ethnicity, social status, or other demographic factors. Within the local legislative framework, the Law on the Prohibition of Discrimination (2009, Article 5) defines segregation as “any act by which a natural or legal person separates, without objective and reasonable justification, another person or group of persons based on personal attributes.”

In the academic literature on urban geography, the dimensions of such spatial distribution examined in research reflect the multifaceted nature of segregation. These include the (un)even presence (or representativeness) of certain (typically minority) groups across different areas; the concentration of specific social groups in particular locations; and the existence of physical, social, and economic barriers that limit interaction between these groups and the wider population, etc.²⁸ Together, these factors produce a combination of spatial and social exclusion for certain social groups, which is why housing segregation is often a central concern in human rights research.²⁹

Given this understanding of segregation, it can be clearly stated that it contradicts the right to adequate housing and negatively impacts the enjoyment of a wide range of other human rights—including the right to health, social protection, work, and education.³⁰ The right to adequate housing is a fundamental human right, recognized in the International Covenant on Economic, Social and Cultural Rights (hereinafter: ICESCR)³¹, and further

28 Massey et al, “*The Dimensions of Residential Segregation*”, p. 283.

29 Timotiević et al., *What We Mean When We Say... Against Housing Segregation*, p. 2-3.

30 Ćurčić et al., *Residential and Spatial Segregation and the Right to Adequate Housing*, p. 5.

31 The Socialist Federal Republic of Yugoslavia ratified the Covenant in July 1971 (*Official Gazette of the SFRY – International Treaties*, No. 7/71), thereby committing, among other obligations, to submit reports to the competent UN body on the measures undertaken and the progress achieved in ensuring the realization of the rights recognized under the Covenant. Following the year 2000, the Federal Republic of Yugoslavia, on 12 March 2001, submitted a declaration of succession to the United Nations, which included the reaffirmation of its adherence to the International Covenant on Economic, Social and Cultural Rights. On 6 September 2023, the National Assembly of the Republic of Serbia ratified the Optional Protocol to the International Covenant on Economic, Social and Cultural Rights, thereby formally adopting the mechanism for the protection of these rights.

elaborated in General Comment No. 4 of the United Nations Committee on Economic, Social, and Cultural Rights. According to this document, “adequacy” encompasses multiple dimensions, from security of tenure and access to basic services to *affordable and adequate location*. The latter two criteria—cost and location—are especially important in the context of social housing, as their interdependence is critical to understanding how spatial segregation and housing unaffordability reinforce each other.

Spatial Segregation of Social Housing. When discussing segregation in the context of social housing, what is meant is *involuntary, planned* residential segregation — a form of segregation that inherently excludes the possibility of choice.³² In Serbia, social housing projects are most often located on the urban periphery, as a result of both a prevailing discriminatory culture toward marginalized groups and an economic rationale of “preserving” land with higher exchange value for more profitable investments. Since the state’s obligation to secure and equip land for social housing is generally treated as an economic burden, the chosen locations are most frequently those in public ownership situated on the outskirts, where a larger number of social housing units can be concentrated. However, this phenomenon is not an isolated case within the local context—it is a manifestation of the global commodification of spatial resources (such as land), as well as of structural discrimination against socially and economically disadvantaged groups. The outcome is twofold: first, social housing becomes synonymous with spatial and social marginalization; second, even when rents are low, living in such settlements remains financially burdensome.

Spatial Segregation of Social Housing and the Question of Affordability.

When social housing units are located on the outskirts of cities—often in areas with inadequate infrastructure and limited public transport, far from workplaces, schools, and healthcare services—their *affordability* becomes questionable. The nominally low or subsidized rent is frequently offset by the additional costs households must bear in their daily lives: commuting expenses, energy bills, and the time and money required to access essential services such as education and healthcare. Thus, spatial segregation gives rise to a *new dimension of unaffordability*—one that cannot be cap-

32 “In the context of planned housing segregation, it is essential to distinguish the so-called voluntary housing segregation (which refers to the ability—typically available to the privileged segments of the population—to isolate themselves from areas of high density and development within the city) from involuntary housing segregation (which denotes the absence of such choice)” p. 4.

tured solely by the rent level, but must be understood through the total cost of living within a specific spatial environment.

The international framework for sustainable urban development clearly recognizes this interconnection. Sustainable Development Goal 11.1 seeks to “ensure access for all to adequate, safe, and affordable housing and basic services,” while the *New Urban Agenda* emphasizes states’ obligation to develop policies that provide *well-located and well-connected social housing*.³³ Thus, a dwelling that is “cheap” in fiscal terms may in practice be unaffordable if it is situated in an isolated settlement that exposes households to additional structural costs. This situation can be described as *structural unaffordability* – a condition in which the overall cost of living in an ostensibly affordable housing unit becomes excessively high once spatial factors are taken into account. This clearly demonstrates that affordability policies must be viewed in relation to *location*; otherwise, social housing risks becoming a mechanism that perpetuates segregation.³⁴

Empirical evidence over the past decades shows a rise in socio-economic segregation across almost all major European cities, with social housing regimes playing a key role in this process.³⁵ In countries where the social housing sector is larger, more mixed, and spatially dispersed, the concentration of poverty tends to be lower and household costs more manageable. In contrast, *ghettoized* models of social housing—such as those most common in Serbia—lead to situations where nominally “affordable” housing becomes economically and socially costly in the long term, as it increases the expenses and disadvantages associated with spatial isolation and poverty.

In other words, segregation and unaffordability are not two separate problems. The spatial isolation of social housing causes it to lose its essential function—to relieve households of excessive costs in exercising their basic right to adequate housing. Instead, it becomes a mechanism that perpetuates poverty and inequality. For this reason, international bodies consistently stress that affordability must not be viewed narrowly through the price of rent, nor even solely through the housing-related costs tied to a specific dwelling, but rather through a broader set of factors that shape living standards and access to rights in urban spaces—factors that are intrinsically linked to location.

33 UN-Habitat, *Housing at the Centre in 2016. Annual Overview of Activities*.

34 UNECE, *#Housing2030: Effective Policies for Affordable Housing in the UNECE Region*.

35 van Ham et al, “A multi-level model of vicious circles of socio-economic segregation.”

2.1. Regulatory Framework Analysis

The domestic legislative framework in the area of housing only indirectly addresses the issue of segregation, while the Law on the Prohibition of Discrimination contains its definition, recognizes segregation as a distinct form of discrimination, and prohibits it. However, there are no detailed regulations that would reflect the political will to genuinely tackle this problem.

As already mentioned, according to General Comment No. 4 of the ICESCR, when determining whether a form of housing can be considered adequate, it is necessary to take into account the criterion of location, which implies that adequate housing must be situated in “a location that allows access to employment options, healthcare services, schools, childcare centers and other social facilities.” However, such access directly depends on the costs incurred by a given household, as the distance between housing and public services or sources of income can significantly increase housing costs and affect affordability.

In line with this criterion, Article 88 of the Law on Housing and Building Maintenance identifies as one of the principles governing the implementation of housing support programs “*spatial and urban adequacy* in terms of the proximity of residential buildings and houses under housing support programs to existing residential buildings and complexes, as well as to other compatible purposes, transport accessibility, and access to public service facilities such as primary schools, childcare facilities, healthcare facilities, grocery stores, and others, in order to prevent spatial segregation of residential buildings and houses included in housing support programs.” While recognizing the importance of location in the overarching law is a positive sign, this still does not constitute an explicit effort to address the existing problem of housing segregation, nor an attempt to prevent it. Furthermore, when the Ministry of Construction, Transport and Infrastructure opened a public consultation in late December 2021 on the Draft National Housing Strategy for the period up to 2032, along with the accompanying Action Plan for its implementation,³⁶ the draft document contained no reference to

36 According to Article 136 (Transitional and Final Provisions) of the Law on Housing and Building Maintenance, the National Housing Strategy was to be adopted within twelve months from the date the law entered into force. This means that the strategy should have been adopted by the end of 2017, given that the law entered into force on 31 December 2016. However, although the draft strategy was presented for public consultation in December 2021, it has still not been adopted—nearly seven years after the legal deadline.

long-term measures aimed at mitigating existing or preventing future spatial segregation in housing.

At the by-law level, the *Rulebook on the Conditions to Be Met by Facilities for Adequate Accommodation of Persons Entitled to Relocation* specifies certain spatial requirements that housing units must satisfy, including access to infrastructure and compliance with safety and security requirements. However, the regulation does not take into account the broader characteristics of the surrounding environment, nor does it acknowledge the importance of preventing spatial segregation.

On the other hand, the *Rulebook on Conditions and Standards for Planning and Designing Residential Buildings and Apartments within Housing Support Programs* (2017) provides, in Article 2—which also addresses the issue of location—several relevant criteria, including the possibility of connection to existing infrastructure networks, proximity to other residential complexes and services, and the suitability and safety of the construction site, among others. Importantly, these criteria are accompanied by a note “avoiding spatial segregation.” The Rulebook also highlights the “accessibility of public transport stations and proximity to existing high-capacity public transport terminals and lines, as well as access to social infrastructure — including primary schools, childcare facilities, healthcare institutions, and grocery stores — and proximity to public green spaces.” While this represents a positive example, the inconsistent and sporadic recognition of housing segregation and its associated risks—particularly within housing support programs—means that, in practice, attention to this issue is likely to remain limited and seldom effectively implemented.



In addition to legislative regulation, addressing spatial segregation requires the regulatory framework to also encompass **urban planning**, as it serves as the primary instrument for determining and regulating land use within cities, structuring how various urban functions are spatially organized.

This section examines the most significant city-level planning document—the General Urban Plan (hereinafter: GUP) — which sets out the strategic vision for urban development over several decades. In the case of Belgrade, the long-awaited General Urban Plan by 2041 was made available for *early*

public review³⁷ in 2022, allowing insight into the proposed directions for the city's social, economic, and spatial development over the next twenty years. However, the plan's concept reflected a continued inconsistency and neglect in addressing housing inequalities and exclusion.³⁸

The *Analysis of Conditions for Sustainable Housing Development in the Republic of Serbia – Baseline for the National Housing Strategy* (2019), along with the *Sectoral Study on Housing* conducted by the Urban Planning Institute of Belgrade for the purpose of drafting the GUP and published during the early public review phase, both provided robust analyses of housing affordability. They identified housing unaffordability as a primary issue and proposed a range of measures, including market regulation and the introduction of new models of public and affordable housing. Yet, despite these studies preceding the preparation of the GUP, their findings and recommendations are entirely absent from the plan's concept. The section describing the current state focuses primarily on statistical data such as the number and size of constructed housing units, their surface area, and demographic indicators such as the average household size and age, as well as the typology of single- and multi-family housing. These are compared to conditions observed at the outset of the previous General Plan of Belgrade (2003). However, this analysis fails to include data on housing affordability, the number of residents in need of housing support, or homelessness—all essential indicators of the actual housing situation beyond the physical stock of dwellings. Furthermore, the distribution of housing units across municipalities would be considerably more meaningful if it incorporated socio-economic characteristics of residents, as this would help identify spatial inequalities within the city—inequalities that long-term planning could and should address. The *Sectoral Study on Housing* conducted by the Urban Planning Institute explicitly acknowledges the need for a “precisely defined assessment of current needs for social and subsidized housing”. Yet, this aspect is absent from the textual section of the plan.

37 The Law on Planning and Construction prescribes two stages in the plan development process that allow for public participation: 1) *Early public review* (lasting 15 days), during which the public is introduced to the plan's concept; and 2) *Public review* (lasting 30 days), during which the detailed draft of the plan is presented to the public. As part of the public review phase, a *public hearing* is also held, providing citizens the opportunity to present and explain their comments on the draft plan in person.

38 The comments on the Belgrade General Urban Plan 2041 discussed in this text are based on the observations that the NGO “*Ministarstvo prostora*” submitted to the Urban Planning Institute of Belgrade.

One of the principles guiding the definition of the strategic objectives of the plan—*housing support*—refers to the “adequate location of zones for social housing and housing for vulnerable groups, subsidized at both the local and central levels.” However, the GUP does not specify what constitutes an *adequate* location, nor does it clarify which types of subsidized housing are envisaged.

Furthermore, Strategic Objective No. 2 in the plan’s concept—aimed at enabling the construction of housing at lower prices—does not explain what is meant by “lower prices.” In addition, such affordable housing is foreseen primarily through *urban regeneration*, a process that often leads to an increase in housing prices within regeneration areas and their surroundings. According to the plan, the spatial distribution of affordable housing is envisaged only in the middle and peripheral zones. In contrast, to prevent segregation and spatial inequality within the city, affordable housing should be *evenly* distributed across all zones, including the central ones—which is not the case here. The principle of a more balanced distribution is, in fact, affirmed in the *Social Housing Study* included in the documentation for the early public review. The study identifies social inclusion as one of the key operational objectives, emphasizing that: “When planning social housing, isolated, most remote locations should be avoided, and this type of housing should be combined with other forms of affordable housing (including privately owned units) intended for a broader range of social groups, within environments characterized by the greatest possible social diversity.”³⁹

As the public has not yet had access to the prepared draft of the plan, it remains unclear whether any changes in the housing domain have been introduced compared to the concept.



It appears that across the regulatory framework—whether in legislative, strategic, or urban planning documents—the issue of segregation is mentioned only sporadically. However, given the complexity of this problem and the wide range of measures required to eliminate it, it is crucial that each relevant document consistently include a clear and detailed plan for its

³⁹ The comments on the Belgrade General Urban Plan 2041 discussed in this text are based on the observations that the NGO “*Ministarstvo prostora*” submitted to the Urban Planning Institute of Belgrade.

resolution. Otherwise, the existing situation will merely be maintained and further intensified.

2.2. Current Situation

A common feature of most social housing projects in Serbia, including those implemented within the territory of Belgrade, is that they are built on publicly owned land provided and equipped by the local self-government. However, since land is increasingly regarded as a valuable resource capable of generating profit—through sale or allocation to the private sector—plots designated for social housing are often those not integrated into the urban fabric. This results in weaker connections to services and sources of income for the residents of such housing, as well as insufficient linkage to basic infrastructure.

An illustrative example is the social housing settlement in **Jabučki Rit**, located in the municipality of Palilula, where 42 families were relocated in 2015. The settlement is served by only a single public transport line—bus No. 106—which operates approximately once per hour. The local medical clinic provides only basic check-ups and emergency interventions and is open only until 10:30 a.m. The nearest comprehensive healthcare facility, the Health Centre in Padinska Skela, is about 12 kilometers away. The local primary school and kindergarten operate with limited capacity, and children from Jabučki Rit, starting from the fifth grade, must attend classes in the “central” school building in Padinska Skela—without a direct public transport connection for students.⁴⁰ The nearest soup kitchen, where beneficiaries of financial social assistance can collect free meals, is located in Borča, more than 15 kilometers from the settlement. Residents must travel approximately one hour each way by public transport to collect their daily meal. Finally, the Centre for Social Work, whose services are among the most frequently needed by residents of such settlements, is located in Cvijićeva Street, requiring about two hours and ten minutes of travel by public transport.⁴¹

40 Information on the locations was obtained from the report: “*The Assessment of the Proposed New Sites – Jabučki Rit 1*,” based on site visits conducted on 22 June 2012 with the Directorate and on 9 July 2012 with UNOPS, the Housing Centre, and the DRC, held in the archives of the A11 Initiative.

41 Information was drawn from the document “*Report on Visits to the Locations Designated for the Construction of Permanent Housing Solutions for Roma Families Relocated from Belville and Gazela*” (30 November and 3 December 2012)”

Let us briefly turn to another example that illustrates how the location of housing—when coupled with severe social exclusion and poverty—can directly affect the realization of guaranteed human rights. This situation was central to the case *L.A. v. North Macedonia*, examined by the European Court of Human Rights, following an application submitted by four Roma women. The first applicant, a 26-year-old single mother of three who was four months pregnant at the time, had never visited a gynecologist because *she could not afford the travel costs to the nearest healthcare facility*.⁴² Although the case primarily concerned discrimination, it is also highly illustrative of the link between segregation and housing unaffordability among the most vulnerable groups.

If we return to the example of Jabučki Rit, it is clear that residents of this social housing settlement find themselves in a similar situation, given the locational disadvantages described earlier. In a conversation with the A11 Initiative, the residents of Jabučki Rit stated: “When our children are sick, we have to go all the way to Padinska Skela and take two buses, and it’s even worse on weekends when buses run infrequently and we have to wait for a long time.”⁴³

A comparable case can be found in the social housing settlement in Mislođin, comprising 32 housing units where Roma families were relocated in 2016. The settlement is located about five kilometers from Obrenovac and is similarly surrounded predominantly by agricultural land. Through this housing program, families were relocated from informal settlements in Belgrade, where most had earned a living by collecting secondary raw materials. In such an isolated location, they were effectively prevented from continuing this work, and their opportunities to generate income through other means were drastically reduced, leaving them dependent on minimal social benefits. The nearest school, healthcare center, and Centre for Social Work are all located in Obrenovac, while the public transport line connecting Mislođin to Obrenovac operates only eight times a day.

If we look beyond Belgrade, the social housing settlement in Požarevac also reflects the assumption of a link between spatial segregation and unaffordability. In 2010, after years spent in a collective center, 19 Roma families in-

⁴² Ćurčić et al., *Residential and Spatial Segregation and the Right to Adequate Housing*, 32.

⁴³ *Ibid.*, 34.

ternally displaced from Kosovo were moved into these social housing units, under the regime of *social housing in supportive environment*. Most of the residents are unemployed and rely on financial social assistance. The settlement is located on the very outskirts of the city, near the municipal land-fill. The area is surrounded on all sides by agricultural land, and there is no paved road leading to the settlement (which means that no public transport routes reach it), nor is there street lighting or waste containers. To reach the nearest primary school, children must walk approximately 2.5 kilometers.⁴⁴

2.3. Towards a Different Approach

There is no doubt that the degree of intervention by the state and local government—through redistributive measures, social protection programs, and housing support—directly affects the extent to which spatial segregation and social exclusion are present.⁴⁵ The focus of this section is on the issue of site selection within social housing programs implemented by local self-government units, whereas alternative approaches to enhancing housing affordability are examined in the subsequent chapter.

When addressing the issue of location, segregation can be mitigated through systematic measures, several of which are discussed below.

One possible approach is to establish a coherent framework of criteria for the selection of sites for social housing programs, ensuring its integration into all relevant planning and housing policy documents. Drawing on the general criteria specified in individual by-laws (as discussed in the previous chapter), it is possible to identify a core set of requirements that each social housing site should fulfill. A good example is the document "*Criteria for Evaluation of Social Housing Locations*", developed within the *Let's Build a Home Together* project at the very beginning of the project, as part of its methodological framework. Drawing on the criteria set out in General Comment No. 4 of the International Covenant on Economic, Social and Cultural Rights, as well as General Comments Nos. 13 and 14—which elaborate on the rights to education and to health care, respectively—a comprehensive set of criteria was developed. One of its components refers

44 The A11 Initiative for Economic and Social Rights produced a short documentary film portraying life in this settlement: https://www.youtube.com/watch?v=NbhC_pZfJwg

45 Musterd et al., "*Socioeconomic Segregation in European Capital Cities. Increasing Separation Between Poor and Rich*", p. 5.

to "Accessibility and availability of services, costs, and financial sustainability", of which the most significant are highlighted below⁴⁶:

- **Availability and frequency of public transport** - This criterion should refer to the number and frequency of buses or other forms of public transport, as well as the distance to the nearest bus stop. The assessment should also take into account the fact that most families earn their income in the informal economy and are engaged in waste collection in the city center. Belgrade has a well-developed public transport network—comprising buses, trams, trolleybuses, and trains—operated by the public utility company GSP Belgrade, all integrated within a unified ticketing system. The suburban network extends from Belgrade to the centers of suburban municipalities, from which local lines connect to smaller settlements. The adequacy of transport frequency should be evaluated separately in each individual case.
- **Cost of public transport to the nearest urban center and/or relevant destinations** - The city's public transport system is unified and applies to all modes of transport (GSP, private carriers, Lasta buses, and Beovoz trains) through the use of personalized and non-personalized electronic cards, as well as single-use electronic tickets. This criterion serves to determine whether families can afford the cost of transportation to workplaces and essential services (such as schools, health centers, and similar), rather than whether they are legally entitled to access and use public transport.
- **Access to employment opportunities or primary sources of income** - In addition to the regular income-generating activities of the male Roma population, who are typically oriented toward city centers through waste collection and resale, the working group should also consider other potential sources of income and employment opportunities for women—such as seasonal work, land cultivation, domestic services, caregiving, and similar activities. Physical access to employment opportunities must be ensured.
- **Access to health care services** - Under this criterion, the working group should assess whether primary health care infrastructure is available in the vicinity and whether it is sufficiently equipped to pro-

46 UNOPS, "Criteria for Evaluation of Social Housing Locations" pp. 6-8

vide basic health services. Distance, operating hours, availability of pediatricians, and similar factors should be considered when evaluating potential locations.

- **Access to primary and secondary schools** - This criterion should primarily address the availability of primary and secondary schools located within a reasonable and safe distance that children can reach easily. Distance, travel time, and similar factors should be considered when assessing accessibility for all grades of both primary and secondary education.
- **Access to the Center for Social Work** - Social protection, as a safety net for the poorest and most vulnerable individuals and families, must uphold the principles of efficiency, accessibility, and the best interests of beneficiaries. Direct access to the Center for Social Work contributes to building a more inclusive and tolerant environment, while simultaneously reducing social distance between minority groups and wider society. It is therefore essential to assess the distance and travel time to the nearest center, as well as any related costs.

Moreover, for all of these services, the criteria explicitly emphasize the importance of considering the *cost of public transport, required travel time, and the element of safe physical distance*⁴⁷ These services are not only essential for everyday life and closely linked to housing conditions, but are also fundamental to the realization of *basic social and economic rights* for all residents. At the same time, they inherently carry an economic dimension—the *potential financial burden associated with exercising these rights*.

This publicly available document can serve only as a starting point for a broader public discussion in which, together with beneficiaries, final criteria could be defined and subsequently incorporated into the regulatory framework.

Stronger integration of strategic social housing planning into the urban planning system. Positioning social housing within urban planning frameworks is a precondition for ensuring access to basic services and amenities, and for combating residential segregation and the unaffordability of social

⁴⁷ Particular attention should be paid to the previously discussed examples of Jabučki Rit, Mislodin, and Požarevac in relation to these criteria.

housing.⁴⁸ This would mean including the housing needs of the most vulnerable groups in the very process of conceptualizing social and spatial relations, with a focus on contributing to spatial and social justice rather than exacerbating inequality, through a more balanced distribution of different housing types. Such an approach would also “reserve” certain locations and ensure that decisions on where to position profitable housing and where to place housing support programs are not made arbitrarily. To date, such discretionary decision-making has only resulted in drastic examples of segregation.

It is noteworthy that the General Urban Plan of Belgrade to 2021, adopted in 2003 (Official Gazette of the City of Belgrade No. 27/2003), introduced—for the first time within the national legal and planning framework—social and affordable housing as a distinct category of housing. The concept of social housing set out in this plan followed international principles of adequate housing and reflected contemporary European experiences. The textual component of the plan provided a definition of social housing, identified the population groups for whom such housing was intended, and specified locations, urban planning parameters, and other implementation instruments.⁴⁹

For example, the plan established criteria for selecting locations for social housing to be applied in the further elaboration of planning documents: a) healthy and suitable locations for housing; b) proximity to existing residential areas; c) relatively easy access to public transport; d) the possibility of connection to adequate infrastructure; e) the presence of essential social services (schools, childcare facilities, retail outlets, health centers, etc.). Although some of these formulations remain somewhat imprecise (for instance, the use of terms such as “relatively” or “acceptable”), which allows for different interpretations, it is nonetheless significant that a reference planning document exists which recognizes the importance of these individual spatial elements in shaping housing solutions for the most vulnerable groups.

In addition, the General Urban Plan envisaged further anti-segregation measures. It stipulated that a share of social housing units should be

48 Vuksanović-Macura et al., “The Role of Urban Plans in Providing Social Housing in Serbia,” p. 218.

49 *Ibid.*, 220.

built within residential developments containing more than 250 apartments, with 5–8% of units reserved for these purposes. This approach sought to ensure a more diverse socio-economic structure of residents.

Finally, the initial version of the plan included a total of 58 locations designated for social housing.⁵⁰ However, in one of the plan's early revisions, this list of locations was removed from the final version.⁵¹

The concept of the forthcoming General Urban Plan of Belgrade (up to 2041) currently does not include specific locations allocated for social housing, although a detailed draft plan that will be subject to public consultation is yet to be published. However, based on the concept version made available to the public, several additional steps could be taken to promote a more equitable distribution of housing:

- The proposed diversification of housing typologies (listed as one of the core principles of the General Urban Plan) should be expanded to include diversification in ownership and purpose. In this way, the strategic plan could, in the long term, enable the construction of affordable housing for various social groups in need, including the most vulnerable populations;

50 A review of the list of these locations—contained in the document *General Urban Plan of Belgrade 2021: Special Records and Lists*, which is no longer publicly available but is archived by the A11 Initiative—shows that locations designated for social housing were evenly distributed across the city's territory, although predominantly situated in the peripheral zones of the municipalities of Čukarica, New Belgrade, Palilula, Rakovica, Voždovac, Zemun, and others. (The references to specific sites, however, are not sufficiently detailed to allow for an in-depth location analysis.) Nevertheless, the very selection of sites represented a significant step toward securing locations for housing the most vulnerable groups and demonstrated—at least at that stage—a commitment to assuming responsibility for addressing housing deprivation among the most disadvantaged groups and to planning the long-term implementation of social housing programs.

51 It is also noteworthy that in the *Recommendation of the Commissioner for the Protection of Equality* addressed to the then Mayor of Belgrade on September 13, 2013, concerning the provision of locations for the construction of social housing units intended to accommodate Roma families relocated from temporary container settlements (following evictions from informal settlements under the Gazela Bridge and near the Belville neighborhood), the Commissioner explicitly referred to this list of locations. In doing so, she recognized the importance of location in ensuring both the quality and affordability of housing. In her letter, the Commissioner emphasized that "locations for the construction of housing for Roma families should meet the criteria of accessibility to health services, schools, childcare centers, and other social services. Furthermore, these locations should have adequate road infrastructure and meet environmental health standards—that is, they should be situated at a safe distance from sources of pollution."

- Balanced distribution of affordable housing across all urban zones should be pursued, to prevent negative outcomes such as spatial and social segregation and their accompanying challenges. This is also where the previously mentioned determination of clear parameters for selecting locations specifically reserved for such types of housing, as well as ensuring the necessary infrastructure, could be applied.
- It is essential to retain and further develop the rule on allocating a certain share of social housing units within residential construction projects. Following the example of the 2003 General Urban Plan, it would be important to establish clear provisions requiring a defined proportion of social housing units within residential complexes. While the mere inclusion of such provisions cannot guarantee that segregation will be avoided in implementation, it can provide a sound basis for careful application.



The example of the settlement in Jabučki Rit clearly illustrates this point. Therefore, it is essential to always take into account the availability and quality of various public services, employment opportunities, transport connectivity, and the ways in which these factors, in interaction with spatial elements, affect the affordability of housing.

Social Housing Costs / Social Housing Standards

"We had electricity and hot water and everything, but we did not have the means to pay for them, and now we have neither electricity nor anything..."

(a social housing beneficiary,
Požarevac)

Beyond the fact that life in settlements built under housing support programs is often structurally linked to limited access to other services, residents of social housing are, in many cases, also deprived of basic infrastructure and burdened by debt and poverty. They are denied access to electricity and water, lose the legal basis for occupying their housing units, and consequently face a constant risk of eviction and, ultimately, homelessness.⁵² Given that these are not isolated or sporadic cases, but affect a significant number of residents, this can be reliably described as chronic and systemic unaffordability of social housing or housing support. Insufficient social protection and support systems, combined with societal insensitivity, prejudice, and an increasingly pervasive culture of discrimination, further exacerbate the problem.

This issue is also acknowledged in the Draft National Housing Strategy⁵³, which, drawing on 2019 data, notes that housing support remains unaffordable for households with the lowest incomes—specifically, those in the first four income deciles. The document further emphasizes that for these households, “additional housing support through various forms of subsidies is necessary.”⁵⁴ For households in the first and second deciles, the analysis concludes that their “housing needs must be addressed through the integration of social protection systems and public housing support.”

Serbia’s social housing unaffordability has also been highlighted by the United Nations Special Rapporteur on the Right to Adequate Housing. Following her visit to Serbia in 2015, she expressed concern upon learning that some individuals who had been provided with social housing after living in extremely difficult conditions quickly fell into rent and utility arrears and consequently remain at risk of eviction.⁵⁵ According to the Special Rapporteur, social housing in this context fails to fulfill its purpose, as it does not provide security for the most vulnerable citizens and does not succeed in ensuring the inclusion of those who are already marginalized, discriminated against, or excluded. Similarly, in 2013, the Commissioner for the Protection of Citizens issued an opinion concerning social housing in the Kamen-din settlement in Belgrade. While confirming the broader issue of housing

52 Ćurčić et al., *Residential and Spatial Segregation and the Right to Adequate Housing*, p. 47.

53 This draft was subject to public consultation in December 2021, but it has not been adopted to date.

54 *National Housing Strategy 2022–2032 / Draft*, p. 43.

55 Excerpt from the statement of the *Special Rapporteur on Adequate Housing*, Leilani Farha, following her visit to Serbia, including Kosovo, in 2015.

unaffordability, the document emphasized that the most vulnerable social groups are not only unable to secure housing independently under market conditions but also frequently *struggle to cover the costs incurred after signing a lease for a unit allocated under social housing programs, leaving them in a persistent state of risk of homelessness.*⁵⁶

In this section of the report, we present the main categories of housing costs that impose a burden on social housing residents, taking into account the challenges posed by the beneficiaries' income levels:

1. Nonprofit rent;
2. Rent-related taxes; and
3. Utility costs

3.1. Regulatory Framework Review

The social housing regulatory framework—particularly the current framework following the integration of social housing into the broader housing support program—fails to adequately respond to the diverse economic circumstances of residents. This is most apparent in the high income threshold used as the eligibility criterion for accessing a social housing unit. Within this threshold, household capacities to cover housing costs vary widely, yet all households are subject to the same uniform conditions and requirements. This lack of responsiveness is further reflected in complementary social protection measures intended to alleviate housing unaffordability, which remain largely insufficient in relation to the actual incomes of many residents. Moreover, the provisions governing the termination of lease agreements are problematic, as they do not adequately account for the realities of insecure and irregular household incomes.

The Broader Issue of Social Housing Affordability. The Law on Housing and Maintenance of Buildings (2016) highlights, in defining housing support and the principles governing its provision, that assistance should be allocated according to the principle of *equity*—“allocating support proportionally to social vulnerability, so that the extent of housing support is greater

⁵⁶ Protector of Citizens, Opinion No. 31199 of 28 October 2013. See: Ćurčić et al., *Residential and Spatial Segregation and the Right to Adequate Housing*, p. 49.

for residents in more severe housing and social situations, and, in the case of persons with disabilities, proportionate to the degree of disability.” Even more importantly, the principle of *social sustainability* emphasizes providing adequate social protection measures to ensure that the payment of all housing costs does not jeopardize residents’ basic subsistence.”

However, Article 91 of the same Law sets out the maximum income threshold that a single-member household may have in order to qualify for housing support. When it comes to non-profit lease arrangements, which are the focus here, this threshold amounts to “1.2 average salaries without taxes and contributions in the local self-government unit, for the purposes of non-profit lease or allocation of an apartment or family house.” For households with more than one member (in the case of Belgrade), this limit is calculated using the following formula:

$$K=1 + O \times 0.7 + D \times 0.5$$

where “O” represents each additional adult household member, and “D” each child.⁵⁷ This means, for instance, that at present, individuals with a maximum monthly income of up to approximately 130,000 RSD in a single-member household are eligible to apply for the social housing program under the non-profit lease scheme. However, this also implies that, assuming all other parameters are equal (number of household members, health condition, etc.)⁵⁸, such individuals fall into the same eligibility category as those receiving financial social assistance, which currently amounts to around 12,000 RSD per month for a single person. Such a high income threshold indicates a lack of awareness of the income range among potential beneficiaries, as well as the fact that the treatment and complementary measures necessary to ensure housing provision cannot be so undifferentiated and universal in character.

Once individuals become beneficiaries of social housing, the **Law on Housing and Building Maintenance** regulates the terms of lease. Namely,

57 Excerpt taken from the *Public Call for Addressing Housing Needs through the Purchase and Lease of Apartments at the Kamendin 2 Location*, 2018 (A11 Initiative Archive).

58 Article 106 of the *Law on Housing and Building Maintenance* defines the priority criteria for the allocation of housing support. These include housing status (whether or not a person owns an apartment), housing conditions, the number of household members, health status, and disability. Priority is also given to beneficiaries of social protection services, including those receiving financial social assistance.

according to Article 92, apartment lease constitutes one of five forms of housing support. Article 94 further defines *the lease of an apartment under non-profit conditions* as “the lease of an apartment in public ownership, for which the tenant pays a non-profit rent, under the conditions and in the manner prescribed by the non-profit lease agreement, and in accordance with the provisions of this Law.” The same Article stipulates that a non-profit lease agreement must be concluded in written form for a period of *up to five years* and, upon the tenant’s written request, *may be renewed for the same duration and under the same conditions*.

The Law also provides for termination of the contract “in the event that the tenant ceases to fulfill the obligations stipulated by the non-profit lease agreement” (Article 94), with a minimum eviction notice period of 90 days. In line with these provisions, the *Decision on the Management of City-Owned Apartments of the City of Belgrade* (2015), Article 37, regulates the conditions for termination of the lease. One such condition applies when the tenant fails to pay rent for at least three consecutive months or four months within a year (Article 37). For most individuals who qualify for and obtain social housing, and who are also recipients of financial social assistance, such a requirement is unsustainable. Considering that work-capable beneficiaries of financial social assistance, even when without income, may receive this support for a maximum of nine months per year⁵⁹ it is quite evident that, regardless of the level of housing costs, they will not be able to consistently meet their financial obligations.

Costs of Renting a Social Housing Unit. Within the social housing rental model, the conditions of *non-profit* tenancy primarily pertain to the rent amount and the method of its calculation.⁶⁰ Article 94 of the Law on Housing and Building Maintenance stipulates that “non-profit rent shall consist of: the costs of maintaining the apartment and the common parts of the

59 Under the Regulation on Income and Earnings Affecting the Exercise of the Right to Financial Social Assistance (2011), income includes “earnings determined by the findings and opinions of Centers for Social Work in accordance with the law” (Article 2). A UNICEF study highlights that the principle of exercising the right for “9 out of 12” months is evident—meaning that there are interruptions in the distribution of financial social assistance to able-bodied beneficiaries, under the pretext of “foregone income” during summer months, when they are presumed to be engaged in potential seasonal or temporary work (particularly in the agricultural sector). See: UNICEF, *Review of Public Expenditures on Social Assistance in Serbia*, p. 62.

60 Ristić, Blagojević. (2020). *Handbook for the Provision of Housing Support in Local Self-Government Units*. Belgrade: Standing Conference of Towns and Municipalities, p. 55.

building, the costs of building management, and the depreciation of the apartment. Non-profit rent shall also include the costs of acquiring and constructing the building in which the apartment is located, that is, the funds invested in the apartment and the related common parts, as well as the land on which that building is constructed.” Non-profit rent is calculated on an annual basis.

A by-law adopted in 2016 – the Rulebook on the Unified Methodology for Calculating Non-Profit Rent – prescribes the methodology for determining the amount of non-profit rent. In line with the Law, the rent is set for a 12-month period, while the Rulebook specifies that this period covers the second half of the current year and the first half of the following year. The rent is calculated according to the following formula:

$$Z=K \times C/100/12$$

where K represents the percentage of the apartment’s value per square meter, amounting to 1.454, while C denotes the market value of one square meter of the apartment for one year. As an illustration, the Public Call for Allocation of the Right to Rent Social Apartments in the Kamedin 2 Settlement (2018) provides the same rent calculation formula. In 2018, the rent for an apartment in Kamedin amounted to 87.25 RSD/m², which corresponds to just under 5,000 RSD for a 55 m² unit.

The **Rulebook on the Unified Methodology for Calculating Non-Profit Rent** also stipulates an additional **5% discount** as an incentive for timely payment. However, although the rent amount may appear affordable in absolute terms or relative to other expenses, two key factors explain why many social housing tenants face contract termination due to non-payment of rent. First, the rent level cannot be considered in isolation from household income. Second, a significant practical obstacle is that the rent cannot be paid separately but only through an integrated billing system via the *Infostan* payment slip. This arrangement prevents tenants from settling at least their rent arrears in cases where they lack sufficient financial means. Non-payment of rent, in such circumstances, may constitute grounds for termination or non-renewal of the lease contract. Consequently, within this rental regime, obligations to pay rent are directly tied to the risk of losing the tenancy, effectively making the payment of utility costs a prerequisite for maintaining housing. This is because regulations require that rent be

paid through the Public Utility Company "*Infostan Tehnologije*" (in the case of Belgrade).



As announced in the introduction, this section also examines the model of *social housing in supportive environment*, where arrangements related to de facto rent differ—they are generally more favorable and more responsive to the financial capacities of beneficiaries. Under this model, the user does not pay rent for the apartment. However, as stated in Article 35 of the *Decision on Social Protection Rights and Services for the City of Belgrade*, "the costs of housing (electricity, telephone, water, heating, and other utility services and fees), as well as the costs of regular apartment maintenance, are borne by the users of the service from their own funds." The same article further provides that "exceptionally, the City of Belgrade, depending on the total income of the beneficiary's household, may cover the costs referred to in paragraph 1 of this Article in full or in part, in accordance with the norms and cost standards established by a special act adopted by the organizational unit of the City Administration competent for social protection affairs." This means that the Secretariat for Social Protection may issue a specific decision to cover part of the mentioned housing costs for certain beneficiaries. Importantly, the Decision does not stipulate that non-payment of these costs may result in contract termination. Article 39 explicitly states that "social housing in supportive environment shall cease if: (a) the service beneficiary no longer meets the conditions established by this Decision for exercising the right to the service; or b) the service beneficiary or a member of their household resolves their housing need in another way." Accordingly, in this model of social housing, termination of accommodation is not contingent upon the inability to cover a portion of housing costs.⁶¹

Property Tax Liabilities Arising from the Lease of Social Housing Units.

An additional problem arises from the fact that tenants of social housing units, under the Law on Property Taxes, are financially burdened with the obligation to pay property tax. Specifically, Article 2 of this Law stipulates the obligation to pay property tax on real estate on the basis of "the right of

⁶¹ A review of the lease agreement of a beneficiary of social housing in supportive environment (A11 Initiative Archive) confirms that, under this model, tenants are exempt from paying rent. At the same time, the tenant is obliged to cover the costs of utility services (the City covers central heating costs) as well as electricity expenses.

lease for a period longer than one year or for an indefinite period, for which the *payment of non-profit rent* or rent calculated according to prescribed criteria and measures is envisaged." Since non-profit lease agreements are concluded for a period of five years, social housing tenants face an additional housing cost that private market tenants *de facto* do not have (due to the chronically unregulated rental sector). The Law not only fails to recognize the possibility of exempting social housing leases from property tax obligations but explicitly provides that the non-profit rent regime is included within this taxation measure.

Other Housing Costs in Social Housing. Apart from the costs related to rent (which may be considered the only genuinely subsidized cost) and property tax, housing costs—as noted in the introduction—also include other expenses associated with the use of housing space. In the territory of Belgrade, this primarily refers to two major expenses: utility services, consolidated and billed by the public company *Infostan*, and electricity services. Although legal provisions and other documents nominally regulate subsidies for these costs, such support remains inadequate, both in terms of the amounts provided and the eligibility criteria for accessing it.

The Decree on Energy-Vulnerable Customers prescribes the criteria and conditions for acquiring the status of an energy-vulnerable customer, which, if granted, provides a reduction in electricity costs. Primarily, the criteria for obtaining this status (Article 3) include material status (total household income, property status, and number of household members), entitlement to financial social assistance, and the health condition of household members. The upper income threshold for households (Article 4) is set in specific amounts (for example, RSD 25,362.52 for a single-member household and RSD 55,033.70 for a three-member household) and is adjusted twice a year. For beneficiaries of financial social assistance, the income threshold requirement does not apply (Article 7). Importantly, even households with outstanding electricity debts may obtain the status of energy-vulnerable customers (Article 3). Once granted, this status ensures a reduction of monthly payment obligations, based on a decision issued by the local self-government authority—in this case, the City of Belgrade. The decision is issued for each calendar year (Article 14).⁶² The reduction takes the form of a specific quantity of electricity that is deducted from the

⁶² This is also the case with financial social assistance, which is likewise revised on an annual basis.

total consumption, depending on the size of the household and the type of energy source.⁶³

With regard to utility costs, under the so-called *Emergency Protection Measures for the Most Vulnerable Citizens*, which are adopted annually at the level of the City of Belgrade, several forms of support are available — including permanent and temporary financial assistance, as well as discounts or subsidies based on expenditures for utility products and services and rent. This measure applies to households in which at least one member is a beneficiary of financial assistance or caregiver allowance (pursuant to the Law on Social Protection), as well as to households with a member who is a person with a disability or a pensioner receiving the minimum pension (in accordance with the regulations on pension and disability insurance). Subsidies are set at a maximum of 30% (with lower percentages also prescribed, depending on household income) and apply to bills up to RSD 8,000. No discount is applied to amounts exceeding that threshold. Prior to 2014, the maximum subsidy rate was 50%, although this reduction was not grounded in any general decrease in poverty levels or improved conditions of social housing; rather, it was an austerity measure that further precarized already highly vulnerable population groups. In addition, regular payment of obligations is a prerequisite for obtaining the subsidy, which, as previously explained, is incompatible with irregular income patterns (whether due to temporary or precarious employment or reliance on financial social assistance).

At the level of the City of Belgrade, another regulation specifically addresses subsidies for utility service costs — the *Decision on Identifying Beneficiaries Eligible for Subsidized Utility Service Rates*. This decision defines the categories of utility service users eligible for subsidized rates, as well as the subsidy amounts for each category of the following services:

- Supply of drinking water
- Treatment and drainage of stormwater and wastewater (sewerage)
- Production and distribution of thermal energy
- Household waste collection

⁶³ Based on the experience of the A11 Initiative, since electricity—unlike communal services such as district heating—can be disconnected, beneficiaries tend to prioritize paying electricity bills over other expenses to avoid service interruptions.

Article 5a specifies those entitled to the maximum subsidy, including beneficiaries of financial social assistance, tenants of social housing, and users with extremely low income (up to RSD 8,000 for a single-member household). Although the categories of beneficiaries only partially overlap with those defined in the previously mentioned Emergency Protection Measures for the Most Vulnerable Citizens, the principles of subsidization remain the same — the maximum subsidy amounts to 30%, and depending on the user category, it may be lower (down to 10%). Furthermore, this subsidy applies only to bills up to RSD 8,000.

3.2. Current Situation

The aforementioned issues, arising from inadequate regulation and conditions governing the lease of social housing units and the design of support measures for the most vulnerable, have resulted in extremely precarious and inadequate living conditions. During her visit to Serbia in 2015, the United Nations Special Rapporteur on the Right to Adequate Housing expressed concern over the unaffordability of utility services and other housing-related expenses, particularly for social housing tenants. In her report following the visit, she emphasized that the denial of access to basic services such as electricity and water is fundamentally incompatible with international human rights standards and underscored the need to rectify such situations without delay. The Special Rapporteur also highlighted the link between housing unaffordability and the low level of social benefits.

The situation in the Kamendin settlement clearly illustrates the far-reaching consequences of such harmful policies. According to the findings of the A11 Initiative⁶⁴ dozens of families live without electricity, having been disconnected from the grid due to accumulated debts. Some residents submitted requests to the Belgrade Power Distribution Company (Elektrodistribucija Beograd, hereinafter: EDB) for repayment of debt in installments, but these requests were denied. Even if they managed to collect the funds to settle their debts, they would still not regain access to electricity. Under EDB's procedures, in addition to proof of debt repayment, tenants must present a valid lease agreement, while the request for reconnection must be submit-

64 A11 Initiative for Economic and Social Rights, "More than 60 Families Living Without Electricity as the City Prepares Forced Evictions of Socially Vulnerable Households," November 2020. <https://www.a11initiative.org/vise-od-60-porodica-zivi-bez-struje-grad-sprema-prinudna-ise-ljenja-socijalno-ugrozenih/>

ted by the property owner — in this case, the City of Belgrade. This, however, is not a realistic option for social housing tenants whose leases have been terminated due to debt and whom the City is attempting to evict from the apartments they occupy. Consequently, many Kamendin residents have been living without electricity for years. Nonetheless, some continue to allocate part of their already limited income to repaying electricity debts.

One of the most illustrative examples is that of S.J., a social housing tenant in Kamendin who, due to a complex administrative procedure, strict eligibility criteria, and specific family circumstances, has long been unable to receive financial social assistance. The discontinuation of this assistance led to debt accumulation and the subsequent termination of her social housing lease. S.J. regularly reports to the National Employment Service and occasionally manages to secure temporary work. Part of this income — the only income her family intermittently earns — is used to pay off electricity debts and *Infostan* utility bills, even though reconnection to the power grid is currently not possible. Having lived without electricity in her social housing unit for 13 years, S.J. has repeatedly submitted requests for lease renewal, explaining the difficult circumstances that caused delays in bill payments. She has stated that she actively seeks and occasionally finds temporary employment and intends to make regular payments, but has received no response. Furthermore, S.J. is among 108 social housing tenants in Kamendin who, in May 2020, submitted a written request to the Mayor of Belgrade seeking a meeting to discuss the social and utility-related challenges they face. However, no response was ever received to this initiative.

The scale of the problem is perhaps best illustrated by data from the electric distribution company of Serbia (*Elektro distribucija Srbije*), according to which, out of 355 electricity users residing in social housing units located in Akrobate Aleksića and Dušana Mađarčića Korčagina Streets in Zemun Polje, 22 have been disconnected from the power grid. It is important to note that this figure does not include users whose electricity meters have been removed due to outstanding debt. Particularly alarming are cases of households that have been living in social housing units without electricity for

more than ten years.⁶⁵ Equally concerning are the data provided by *Infostan Tehnologije*, indicating that, out of a total of 445 users at the same addresses, enforcement proceedings for debt collection have been initiated against as many as 236 tenants. These findings are based on research conducted by the A11 Initiative in 2025. By way of illustration, some social housing tenants have accumulated multimillion-dinar debts related to *Infostan* charges, including rent, with certain amounts exceeding RSD 3.5 million — debts that, given their extremely poor financial status and minimal income, they are unlikely ever to be able to repay.

During the discussions with residents of the Kamendin settlement, organized by the A11 Initiative in June of this year, one participant stated that he knew a beneficiary receiving financial social assistance in the amount of RSD 23,000, while her utility bill amounted to approximately RSD 39,000⁶⁶. He also mentioned beneficiaries receiving only RSD 12,000 in assistance, while their bills were twice as high. This highlights a stark disproportion between income and housing-related expenses. As previously emphasized, obtaining and maintaining eligibility for additional subsidies for housing costs is extremely challenging. Moreover, even when such subsidies are granted, the gap between income and expenses remains so large that it perpetuates a continuous cycle of indebtedness. Another tenant from Zemun Polje lives alone and is unable to work. He receives financial social assistance in the amount of RSD 12,181. His monthly *Infostan* bill, which includes rent for the social housing unit, totals RSD 14,342, while his electricity bill amounts to RSD 5,671. Another participant in the discussions explained:

“Some people have debts of up to three million [dinars]. You’re not eligible for an Infostan subsidy because we can’t pay regularly. For six years, we paid regularly because Infostan was 4,000–5,000 dinars at most, sometimes 10,000 in winter, but now it’s inhumane — bills come in at 17,000, 20,000, even 24,000 dinars.”

65 Since electricity and heating costs dominate housing expenses, these figures primarily indicate the presence of energy poverty within the broader context of housing deprivation. See: Vuksanović-Macura et al., *Social Housing in Serbia: Alternative Models Available to the Most Vulnerable Families and Disadvantaged Women*, p. 117.

66 The bill also includes heating costs calculated based on consumption, meaning that during the winter months it rises substantially, while in summer it is lower.

A similar situation exists with regard to electricity costs. Growing electricity debt leads to disconnection from the grid, further forcing households into unregulated and often life-threatening arrangements for energy access. One respondent recounted:

"I've been without electricity for about four years. [...] I used to pay people RSD 10,000 a month just to have anything at all, but now no one wants to help anymore. I went to court and had to pay over RSD 60,000 because I had been using electricity illegally — they cut me off, but I reconnected myself, so they removed the meter and fined me RSD 60,000. It's me, my son, his wife and baby, and my two underage sons — all of us without electricity. We cook on gas, have one battery-powered light bulb, a friend gives me hot water, and we wash our clothes elsewhere."

Another illustrative example is the social housing settlement in Požarevac, where, due to outstanding debts, 18 out of 19 households lack regulated access to drinking water, and 11 have been disconnected from the electricity grid. One of the tenants explained:

"[When we moved in] it was really great at first. We had electricity, hot water, everything — but we had no means to pay, and now we have nothing, no electricity, nothing at all... We had electricity for maybe four or five years, didn't pay at all, and the debt accumulated, so they came and cut it off. For a while, we used [electricity] from a neighbor for two or three years, and now we're getting it from my mother-in-law — one light bulb and a TV, that's all!..."

One tenant, an internally displaced person from Kosovo living in a 24-square-meter apartment in the same settlement, receives the so-called "Kosovo allowance" in the amount of RSD 8,500 per month, while his electricity costs alone range from RSD 7,000 to 8,000 per month. Out of fear of being disconnected from the grid, he prioritizes paying electricity bills but faces great difficulty covering other essential living costs.

Additionally, many beneficiaries suffer from chronic illnesses or disabilities that prevent them from participating in the labor market, which further re-

duces their income and negatively affects their social inclusion. Beneficiaries of financial social assistance are in an especially vulnerable position. As the residents' testimonies show, the amount of this assistance is insufficient to cover even basic housing costs and essential household needs. Moreover, interruptions in the provision of financial social assistance to beneficiaries deemed "able to work" often lead to the loss of eligibility for prescribed subsidies. Once subsidies are withdrawn, utility costs are charged in full, and social housing tenants begin to accumulate substantial debt.

Given the lease obligations requiring tenants to make regular rent payments, many households and individuals find themselves at risk of having their lease agreements terminated or not renewed due to accumulated debt. Such outcomes create additional legal insecurity and expose social housing tenants to the risk of forced eviction, as they no longer have a legal basis to continue occupying the housing units allocated to them. Furthermore, the non-renewal of lease agreements causes additional administrative difficulties, as tenants without a valid lease cannot register the residence of new household members — whether due to birth, marriage, or cohabitation — thereby restricting or complicating access to other rights. Ultimately, this process culminates in a state of severe housing and social deprivation — the very condition the social housing support program was originally designed to prevent.

A total of 285 housing units owned by the City are leased under non-profit conditions in the municipalities of Novi Beograd and Zemun. Among these units, 236 enforcement proceedings were initiated in 2025 due to outstanding debts to Infostan Tehnologije, marking an increase of 25 cases compared to 2019. In terms of electricity arrears, 22 out of 355 users are living without power supply. As of 2025, 56 eviction proceedings are underway, of which 17 have been legally finalized.

3.3. Towards a Different Approach

When considering alternative scenarios for social housing, a persistent dilemma arises regarding the extent to which, in a structurally unjust society — and consequently within the policy system itself, whether in housing or social protection — it is meaningful to propose interventions that merely "correct" the shortcomings or errors of existing measures and regulations.

Conversely, even modest actions addressing years of neglect in the housing sector, particularly for the most vulnerable populations, could produce tangible improvements in the housing conditions of current social housing tenants, or of those who should be included but remain outside the social housing support system. Here, we outline clusters of steps that we consider to be of priority.

Enhancing the system for analyzing and monitoring housing conditions, particularly for the most vulnerable citizens. For timely and effective interventions, it is essential first to establish systematic and continuous data collection encompassing all relevant information, providing a clear picture of the status of publicly owned housing units and the circumstances in which social housing tenants live.⁶⁷ Although such data collection is in principle mandated by the Law on Housing and Maintenance of Buildings (Articles 114 and 115), in practice it is crucial to develop a comprehensive set of criteria and methodologies for gathering this information. A holistic, cross-sectoral approach to data collection and analysis can guide more targeted and effective measures and policies in both housing support and social protection.

Designing and implementing housing support programs that are sensitive to the diverse circumstances of the most vulnerable residents. Social housing programs and other housing support initiatives cannot be sustainable without differentiation among potential beneficiaries, taking into account both their financial situation and their capacity to cover housing costs — as is at least formally envisaged under the model of social housing in supportive environment. Additionally, housing support systems must be responsive to changes within households, such as variations in family size, aging, or loss of capacity, etc. In this way, housing affordability can only be structurally improved by working together with beneficiaries according to their means, ensuring that housing costs do not inevitably lead to indebtedness and that other household needs can also be met from the family budget.

Aligning Housing Costs within the Social Housing Regime with Beneficiaries' Financial Capacity. State support, subsidies, and tax policies

⁶⁷ The *Manual for Providing Housing Support in Local Self-Government Units* (2020) explicitly notes that “the key problem that all local self-government units will initially face is the lack of data on citizens’ housing vulnerability, as well as on publicly owned housing units and other assets (e.g., land for construction), necessary for undertaking public policy measures to address these and numerous other issues in the housing sector.” See: Ristić et al., *Manual for Providing Housing Support in Local Self-Government Units*, p. 31.

must be conditional on meeting affordability standards, as required by international obligations and legal regulations. This could include the following measures:

- First, there are a number of urgent measures that could temporarily address cases of neglect and the precarious situation of social housing tenants under non-profit leases. This includes suspending eviction proceedings and restoring electricity access for tenants who have been disconnected due to outstanding debts;
- As a form of palliative intervention, particularly vulnerable existing social housing tenants—those with low incomes, recipients of financial social assistance, or facing other obstacles in exercising their rights—should be allowed to change their status and become beneficiaries of social housing under supportive environment, in accordance with the Decision on Social Protection Rights and Services of the City of Belgrade. This Decision provides for exemption from rent payments and also allows for further reduction of costs at the discretion of the Secretariat for Social Protection;
- Review existing regulations in the areas of housing support and social protection (such as the previously mentioned decisions and decrees) to ensure that assistance mechanisms genuinely reduce the financial burden on social housing tenants. This could include increasing the proportion of cost subsidies, revising eligibility criteria, or introducing alternative measures that calculate housing costs differently within the social housing model⁶⁸;
- Abolish the regulation that ties the legal security of tenancy to the payment of rent or any housing-related costs. As noted by the United Nations Special Rapporteur in the 2023 report, “no one shall be evicted for non-payment of rent due to financial incapacity”;⁶⁹
- Abolish property tax for leases exceeding one year under housing support programs and within the non-profit lease regime.

68 This could be directed toward determining the portion of housing costs that users pay based on their actual incomes (a reference threshold of 30% could also be used), as opposed to the current calculations for subsidies (both for rent and other housing costs), which in some cases are arbitrary and lack adequate effect.

69 UN, *A place to live in dignity for all: make housing affordable*, 23.

Ensure a participatory approach in the design and oversight of public policy mechanisms and measures in the fields of housing and social protection. It is necessary to establish sustainable mechanisms that enable the active involvement of beneficiaries of housing support and social protection services in the preparation and adoption of strategic and planning documents, as well as regulations governing these areas. Only through the direct experience and perspective of service users is it possible to formulate policies that genuinely address their needs and contribute to reducing spatial and social injustice.

Ensure adequate financial resources and institutional capacity for the long-term implementation of public policies in housing and social protection. Where there is genuine political will to improve the housing conditions of the most vulnerable households through housing and social support systems, it is crucial to identify the necessary resources — not as mere expenditures, but as an investment in guaranteeing access to human rights for all residents — and to embed them as a permanent element of the public budget. Without such measures, any state or local government intervention cannot achieve lasting and sustainable effects.

Conclusion

**"God help us... What can one say?
Without electricity, without
water — it simply cannot work."**

(a social housing tenant,
Požarevac)

In the document the *Guidelines on Social Housing*, the United Nations Economic Commission for Europe emphasizes that social housing plays a role in fostering the long-term resolution of social exclusion, reducing disparities in wealth and income, preventing social polarization, and increasing the sense of belonging among the most vulnerable citizens.⁷⁰ For a relatively conservative document, these are highly ambitious expectations for social housing. Unfortunately, in practice it is rare for even one of these objectives to be achieved, and the local context in Serbia is no exception.

Analyses of social housing in Belgrade and other Serbian cities indicate that unaffordability manifests at multiple levels and constitutes a chronic, systemic problem. Even when rents are formally subsidized, total *housing costs* — encompassing taxes, utilities, and energy expenses — far exceed the actual financial capacity of the most vulnerable households. As a result, social housing, instead of providing security and mitigating existential uncertainty, often becomes a new form of precarity, exposing tenants to persistent risks of indebtedness, eviction, and homelessness. This problem of unaffordability is further exacerbated by *spatial segregation*. The majority of social housing settlements are planned and constructed on the urban periphery, and such isolation imposes additional costs on tenants. In this context, segregation and unaffordability are inextricably linked: housing intended to alleviate poverty instead perpetuates and deepens it. Although the regulatory framework formally acknowledges principles of fairness, social sustainability, and spatial-urban adequacy, in practice it remains inconsistent and insufficiently responsive to the actual incomes of beneficiaries. Field research conducted by the A11 Initiative clearly illustrates the real-world consequences of these policy gaps. Despite repeated warnings from international bodies and local civil society organizations, state and local authorities have yet to establish durable mechanisms to reverse this trend.

Accordingly, it is imperative to consider amendments to existing regulations, alongside alternative measures and policies that would position *housing support* as a genuine instrument of social and spatial justice. The proposals presented here do not exhaust all possibilities, but it is unequivocally clear that a strategic *shift* is needed toward policies that are *participatorily* designed to reflect the real needs and capacities of the most vulnerable citizens, supported by the necessary commitment and resources to ensure consistent implementation.

⁷⁰ UNECE, *Guidelines on Social Housing. Principles and Examples*, 104-110.

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General Urban Plan of Belgrade until 2021 <https://www.urbel.com/srp/biblioteka-planova/2930/detaljnije/w/0/generalni-urbanisticki-plan-beograda-2021/>

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