

EASPD Position Paper

Housing as a path to inclusion and independent living:

Recommendations for the European Affordable Housing Plan



EASPD's contribution on the EU Affordable housing plan

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Introduction

Across the European Union, the right to housing remains out of reach for many persons with disabilities, particularly those living in institutions or at risk of institutionalisation. As the EU strengthens its focus on affordable and sustainable housing, it must seize this moment to support the **transition from institutional to community-based living**.

The European Association of Service providers for Persons with Disabilities (EASPD) is the leading voice of disability services across Europe. Representing over 20,000 services in over 46 different countries, we promote human rights and equal opportunities for people with disabilities through effective and high-quality support.

Our work focuses on key areas essential to quality support provision. This includes inclusive living, employment, education, early childhood intervention, workforce development and human resources, person-centred technology and artificial intelligence, policy impact and arts, culture and sports.

It is based on the expertise of our members who provide essential services to persons with disabilities and pioneer the development and implementation of community-based housing services that we contribute to the European Commission's call for evidence on the European Affordable Housing Plan.

In the Affordable Housing Dialogue, **service providers for persons with disabilities are key stakeholders**. They are strategic partners to help ensure that future policies effectively address both the housing crisis and the transition from institutional to community-based living. Through personal assistance, supported housing, and community-based support services, they empower millions of individuals to live independently, participate fully in society, and enjoy a better quality of life. Founded on the experience of EASPD members, who work daily across Europe to overcome the systemic barriers to independent living, this contribution gives evidence-based recommendations that reflect the challenges from the ground.

The right to housing: International Standards and EU Commitments

As the housing crisis deepens across the European Union, persons with disabilities are particularly at risk of seeing their fundamental right to housing being violated, whether from homelessness or from living in inadequate housing such as institutional settings. According to the European Expert Group on transition from institutional to community-based care, at least 1.44 million people were still living in institutions in 2020 in the EU¹. The European Affordable Housing Plan **is a major opportunity to reverse this trend and take a step towards the right to accessible, affordable, and non-segregated living arrangements for persons with disabilities**, in line with the [UN Convention on the Rights of Persons with Disabilities](#) (UNCRPD).

The UNCRPD, ratified by the EU and all Member States, enshrines this right. Article 9 calls for equal access to housing, also requiring the implementation of minimum accessibility standards and guidelines for public facilities and services. Article 19 affirms the right to live independently and be included in the community, including the right to choose the place of residence and where and with whom to live, the right to have access to a range of in-home, residential and community support services and facilities on an equal basis with others. Article 28 guarantees an adequate standard of living and social protection, including access to public housing.

In 2017, the UN Committee on the Rights of Persons with Disabilities adopted the [General comment No. 5 on living independently and being included in the community](#) explicitly stating that the UNCRPD requires affordable housing for persons with disabilities. It emphasises the importance of ensuring enough accessible and affordable housing units in the path to deinstitutionalisation, the need for public and subsidised housing programmes, and highlights that requiring persons with disabilities to pay for disability-related expenses themselves is contrary to the UNCRPD.

In its [Concluding Observations on the second and third periodic reports of the EU](#), the UN Committee on the Rights of Persons with Disabilities raises concerns about various violations of the UNCRPD including institutionalisation, lack of accessibility of the built environment and accessibility standards. Concerning Article 19, it raises concerns about the use of EU funds for the construction and maintenance of institutional facilities and the

¹ Šiška, J. and Beadle-Brown, J. (2020), Report on the transition from institutional care to community-based services in 27 EU Member States, EEG, Brussels.

inefficiency of monitoring mechanisms in the allocation of those funds. It recommends prioritising investments for the development of accessible and affordable housing for persons with disabilities, personal assistance, centres for independent living and other types of individualised support. The Committee also raises concerns about the high level of poverty and social exclusion among persons with disabilities. It calls for the European Affordable Housing Plan to specifically target accessible and affordable housing for them, recommends prioritising such housing within the EU Regional Development Fund and earmarking EU Social Fund allocations for social inclusion and combating poverty of persons with disabilities.

In the EU context, the [EU Charter of fundamental rights](#) recognises in its article 34 the right to social security and social assistance including the right to housing assistance. The article 26 of the Charter also recognises the right of persons with disabilities to be integrated and to participate in the life of the community. Inclusion of persons with disabilities and housing assistance are further recognised as two of the twenty key principles of the [European Pillar of Social Rights](#), along with the principle of long-term care, promoting the right to long-term care services of good quality, in particular home-care and community-based services.

In addition, among the flagship initiatives of the [Strategy for the Rights of Persons with Disabilities 2021-2030](#), the [Guidance on independent living for persons with disabilities](#) significantly emphasises the EU's commitment to implement article 19 of the UNCRPD and to promote the right to accessible, affordable, and non-segregated living arrangements for persons with disability and to support member states in developing and implementing national deinstitutionalisation strategies.

Concerning children with disabilities, they are clearly identified as a target group of the [European Child Guarantee Recommendations](#) which also recognises adequate housing as one of the key services required to prevent and combat social exclusion. Ensuring access to adequate housing for children in need requires taking into account the needs and interests of families with children with disabilities as a key element of preventing institutionalisation.

Ensuring the right to live in the community: challenges and priorities for inclusive living

Housing as an element of deinstitutionalisation

Building on the legal framework established by the UNCRPD, and in particular Article 19 on the right to live independently and be included in the community, many countries have undertaken significant reforms to shift away from institutional models of care. These efforts reflect a growing recognition that persons with disabilities should enjoy the same rights to equality, dignity and autonomy as all members of society and to make choices about one's own life, **including where and with whom to live, and to participate fully in community life.**

In practice, this has involved replacing large-scale institutions with community-based services and support arrangements that **promote personal choice, control and inclusion.** Many countries have implemented reforms to move towards smaller, more personalised housing options located within the community, designed to support autonomy and inclusion, helping persons with disabilities live as equal and active members of society.

Despite progress, the transition remains incomplete and in the last decade (2013-23), the overall number of adult and older people living in institutions increased². The lack of affordable and accessible community-based housing has been identified as a major obstacle to scaling up community living, with cases of persons disabilities forced to remain in temporary accommodations far longer than necessary due to the unavailability of suitable, permanent housing. Sometimes, individuals have remained in hospitals or prisons, beyond medical or legal needs due to the lack of housing³. Insufficient focus on social and affordable housing has led to growing reliance on temporary solutions that may replicate institutional models. The barriers are both physical and systemic, reflecting a wider failure to embed disability and inclusion in housing policy, leaving individuals at risk of long-term exclusion.

² Eurofound (2024), Paths towards independent living and social inclusion in Europe, Publications Office of the European Union, Luxembourg.

³ Šiška, J. and Beadle-Brown, J. (2020). Transition from Institutional Care to Community-Based Services in 27 EU Member States: Final report. Research report for the European Expert Group on Transition from Institutional to Community-based Care.

Barriers and support on access to housing for persons with disabilities

The OECD⁴ [notes](#) that persons with disabilities face major financial and informational barriers in the housing market. The extra cost of renting and buying accessible housing exacerbates their already higher rates of poverty and social exclusion. Furthermore, there is a shortage of accessible homes that support safe, independent living, and too little emphasis on inclusive design that accommodates diverse physical, intellectual, mental and sensory needs. The lack of sustainable and accessible housing along with energy poverty further increases the cost of living disproportionately affecting persons with disabilities, limiting their choices. In some cases, there is an overlap between homelessness and disability, where disability can lead to homelessness, and homelessness can create or worsen existing impairments and barriers.

Most countries provide a combination of mainstream housing supports (social housing and housing allowances) and disability-specific supports, including funding for accessibility upgrades, independent living services, and housing advice. Persons with disabilities face barriers in buying properties due to difficulties accessing financial services such as obtaining loans or insurance. Legal restrictions, such as guardianship arrangements, can also prevent them from accessing housing benefits or signing tenancy agreements, further limiting their independence and access to support. In addition, data collection remains fragmented and it is often unclear how much is invested, or how many people benefit from supports. Without reliable data and transparent reporting, assessing the impact of current policies or planning for inclusive housing at scale is extremely challenging.

The role of disability social services and the limits of fragmented systems

In many cases, especially for people with intellectual disabilities, social services are the main providers of housing. While the long-term objective remains a separation between the provision of mainstream housing which should be accessible to persons with disabilities and disability support- this would provide more choice and flexibility for persons with disabilities. In most contexts, this separation is not yet feasible and service providers are therefore stepping in to ensure that people are not left without a home or the assistance they need to live independently. These services often encounter significant difficulties in accessing social and affordable housing within the community. The ability of

⁴ OECD (2021), A crisis on the horizon: Ensuring affordable, accessible housing for people with disabilities, Employment, Labour and Social Affairs Policy Briefs, OECD, Paris.

providers to support independent living is weakened by the shortage of available and accessible homes in inclusive settings.

Fragmented policies result in unclear eligibility rules and complicated application procedures for social housing or housing support, making the system hard to navigate. In many instances, funding arrangements do not match the needs of community-based living and instead offer support mainly within institutional settings. The continuing lack of affordable, accessible housing further limits efforts to help individuals move out of institutions. Even when policies encourage community inclusion, the absence of suitable housing can delay or undo progress. In the last years, this was combined with rising and energy costs and general inflation⁵, which further endangered the financial sustainability of service providers, continuity of care, and the actions they undertook to move towards person-centred approaches. These ongoing gaps lead to limited services, reduced choice, and a loss of autonomy.

Public authorities, social service providers and social economy actors active in the field of disability can use more the exemptions granted by the SGEI Decision⁶, in relation to social housing, to support the provision of inclusive housing solutions to people with disabilities. Social housing can be considered as a Service of General Economic interest (SGEI), therefore, the SGEI decision can be applicable when it comes to providing state aid to social housing actors, including social services for persons with disabilities. Yet, as recognised also in the Social Economy Action Plan, the Member States largely underuse the SGEI decision that allows for more substantial funding. At the same time, the general de minimis Regulation or SGEI de minimis Regulation are overused.

Another major challenge is the lack of coordination between the housing and disability sectors. Although they share similar goals, they often work separately, with limited communication and policies that do not align. Housing authorities not always fully recognise the specific needs of people with disabilities, while disability service providers

⁵ [Initial snapshot report on the rising cost of living on service providers in the disability sector.pdf](#)

⁶ The SGEI Decision recognises the importance and the specific characteristics of social services. Therefore, it establishes that there is no ceiling for public service compensations granted by public authorities to providers of services “meeting social needs as regards: health and long-term care, childcare, access to and reintegration into the labour market, social housing, and the care and social inclusion of vulnerable groups”. In this way, the social services defined in Article 2(1)(c) of the Decision can receive compensation for any amount that is considered appropriate by the public authority in question and are exempted from notification. www.easpd.eu/publications-detail/impact-of-state-aid-on-the-development-of-the-social-economy-and-on-service-providers-for-persons-with-disabilities/

frequently face difficulties in understanding complex housing systems or securing suitable funding. This lack of connection results in gaps in services, delays in moving out of institutional care, and missed chances to arrange appropriate housing with the right support. Without joint planning and cooperation, many individuals are left without the stable, accessible housing needed for independent living. Strong collaboration between sectors is therefore essential to make community living a reality.

Tackling these challenges requires **an integrated approach that combines policy reform with practical solutions**. This includes **aligning housing and disability policies, ensuring adequate funding for community-based living, and expanding the supply of accessible homes**. Addressing both systemic and practical barriers is essential to support the transition from institutional to community-based living.

As the EU enters the second phase of its disability strategy, with an expected renewed focus on independent living, it is crucial that the upcoming EU Affordable Housing plan reflects and supports these objectives. **There must be a clear and deliberate alignment between housing policy and the goals of the disability strategy to ensure that investments in housing also promote the rights and freedoms of persons with disabilities.**

Recommendations

This position paper presents a set of recommendations, based on the expertise of EASPD's members -social services for persons with disabilities- aimed to guide the development of the EU affordable housing plan. These recommendations are designed to ensure that housing initiatives do not operate in isolation but rather contribute meaningfully to the broader vision of an inclusive and rights-based Europe, contribute to, foster and accelerate the transition from institutional to community-based care.

The shift away from institutional models towards community-based support is part of a broader transformation in disability policy from a medical approach to one rooted in human rights and inclusion, where inclusion in the community is a key element. To succeed, housing policies should ensure that investments contribute meaningfully to inclusion, autonomy, and quality of life. The EU Affordable Housing Plan must thus be aligned with and complementary to the EU's disability policies, particularly those around deinstitutionalisation, as a part of the expected second phase of the Disability Rights

Strategy, in the EU and national funding for social inclusion, and the connected regulations.

1. Remove barriers and expand access of persons with disabilities to accessible and affordable housing.

Targeted actions should ensure that persons with disabilities can enjoy their right to housing, by increasing the offer of accessible housing and by addressing the legal, administrative and financial barriers people face.

⇒ **Increase supply by introducing housing quota and set EU accessibility standards**

Increase the overall supply of affordable housing and encourage Member States to reserve a portion of public housing for persons with disabilities. This includes setting aside units in newly built or renovated affordable housing, especially when supported by European funds. Universal design and inclusive architecture should be promoted through targeted incentives alongside the adoption of a set of EU standards for accessible design in both new construction and renovation, especially in social and publicly funded housing. These EU based standards should account for different disabilities and should work as a precondition for receiving European Union funding. Housing development and policies should reflect the values of the UNCRPD by ensuring access, autonomy, and choice in housing for all, while accounting for individual needs and support independent living.

⇒ **Provide direct funding support to individuals and families**

Encourage the creation of national funding systems that allow persons with disabilities and their families to make independent choices about where and how they live. Support person-centred approaches to funding such as Personal Assistance Budgets (PABs) covering the cost of home adaptations (ramps, accessible bathrooms, visual alarms), assistive technologies (smart home devices or mobility tools), and in-home support, especially during life changes like leaving institutional care.

⇒ **Remove legal and administrative barriers for the access to housing for persons with disabilities**

Encourage reforms that eliminate restrictions preventing persons with disabilities from signing tenancy agreements or accessing housing support. This includes addressing guardianship laws that limit legal capacity, promote supported decision making and

ensure people can access clear and easy-to-understand information about housing options and rights. The transition to community living should be made with careful planning to ensure that people do not lose either their current housing or the support provided.

- ⇒ **Ensure co-production, coordination and build a European community of practice**
Involve persons with disabilities, families, their representative organisations and social services in the design, delivery, and evaluation of housing policies. Governance platforms at national and European level bringing together all the different stakeholders can lead reforms while taking into consideration the needs and specificities of each stakeholder. A European Community of Practice can play a key role in exchange of ideas, tools, and good practices for creating inclusive housing and support systems across Europe.

2. Strengthen the role of disability services and improve cross-sector collaborations

While securing housing for persons with disabilities, it is also essential to ensure access to services and support further enabling them to realise their right to independent living and inclusion in the community. This also needs to improve cooperation, coordination and mutual learning between sectors.

- ⇒ **Strengthen the role of disability services**
In light of the current legal and structural realities across Europe, where accessible and adequate housing options remain limited, disability service providers — particularly those supporting persons with intellectual disabilities — play a vital role in ensuring that people are not left without a home or the assistance they need to live independently. Within this context, the European Affordable Housing Plan should recognise and support this role by offering targeted funding and technical assistance. This includes helping disability service providers access the housing market, apply for social housing, manage housing-related benefits, and adapt housing stock to meet accessibility requirements tailored to individual needs.
- ⇒ **Adapt and expand the Housing First approach to meet disability needs**
Promote the wider use of the Housing First model as a key strategy to support persons with disabilities, especially those at risk of homelessness, institutionalisation, or social exclusion. This approach prioritises providing immediate, permanent housing with no preconditions, combined with flexible, person-centred support. Housing First should be

adapted to meet the specific needs of persons with disabilities, including those with psychosocial or intellectual disabilities, by ensuring homes are accessible and that support services are available, rights-based, and tailored to individual goals.

⇒ **Improve cross-sector cooperation**

Help Member States build strong coordination between housing authorities, disability services, and the homeless sector. Joint planning, shared eligibility rules, and integrated service models can ensure that housing is linked to the support needed for independent living. European Social Fund+, Horizon, or Erasmus+, can support fund joint initiatives that bring together these stakeholders to create cross-sector innovation.

⇒ **Provide training for professionals across sectors**

Develop training programmes for social workers, housing officers, planners, and local authorities to build awareness of the rights and experiences of persons with disabilities. Persons with disabilities, their families, social services should support the co-design and co-delivery of these programmes to ensure disability inclusive perspectives. Use programmes like the Union of Skills, Erasmus+, and Horizon Europe to increase skills development and support collaborative work. Encourage Member States to align training with the UNCRPD including user-led planning, personalised support, and inclusive housing design.

3. Housing as an element of deinstitutionalisation and community-based living.

The current EU emphasis on housing and the second phase of the Disability Rights Strategy represent a unique opportunity to accelerate the transition from institutional to community-based care through consistent and coordinated action.

⇒ **Align the EU Strategy on the Rights of Persons with Disabilities with the EU Affordable Housing Plan**

As the European Commission is currently planning the 2nd phase of the EU Disability Rights Strategy, it should ensure alignment of goals and implementation of these two frameworks, including targets, funding priorities, and monitoring mechanisms. Building upon the Guidance on Independent Living and Inclusion in the Community and in collaboration with the EU Affordable Housing Plan, the EU has a unique opportunity to support the implementation of the right to housing for persons with disabilities across Europe. This means access to person-centred and community-based services, appropriate funding, and a commitment to inclusion to avoid isolation and dependence.

⇒ **Scale up EU funding for community-based living and accessible, affordable housing.**

Scale up the use of cohesion funds to create accessible housing in the community and foster the development of community-based housing services, and frame them as part of the deinstitutionalisation process. Establish a dedicated European fund to support and prioritise housing projects that apply accessibility principles from the start and support the upgrading of existing homes to meet the needs of people with different types of disability. Use and strengthen Common Provisions Regulation to ensure that EU funds prioritise investments in accessible housing and community-based housing services that enable independent living and inclusion in the community. Co-financing should be available for national and local authorities, non-profit housing providers, and social services.

⇒ **Unlock national investments in accessible housing through the revision of State Aid rules.**

Update State Aid rules to allow larger and more flexible investments in accessible housing. Through the revision on the General Block Exemption Regulation, more flexibility can be granted for especially costly accessibility adaptations. This should also be coupled by either raising or removing the limits on how much Member States can spend on home adaptations to help providers invest in long-term, community-based solutions in line with the rights of persons with disabilities. As the provision of social housing and related social services in general often requires significantly larger funding than the de minimis thresholds allow for, we strongly encourage the Commission to promote and simplify the use of the SGEI decision for the Member States and not-for profit actors, including providing up-to-date guidance and training.

⇒ **Improve data collection and monitoring**

Require Member States to collect data on accessible and affordable housing stock, access of persons with disabilities to housing and social housing, exclusion rates, number of people residing in institutions, and moving to community-based settings. This data should feed into broader EU monitoring of deinstitutionalisation efforts and be embedded in the European Semester process.

EASPD will continue contributing to the EU Affordable Housing Plan by launching a collection of good practices in the area of housing for persons with disabilities.



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