



European Social Policy Analysis Network (ESPAN) Access for children in need to the key services covered by the European Child Guarantee

UISER (APPLICA) SOOSE

Montenegro

Jadranka Kaluđerović and Melisa Muratović



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Contact: Flaviana Teodosiu

E-mail: flaviana.teodosiu@ec.europa.eu

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Jadranka Kaluđerović, Institute for Strategic Studies and Prognoses Melisa Muratović, Institute for Strategic Studies and Prognoses

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Summary

On 14 June 2021, the Council of the European Union adopted a Recommendation establishing a "European Child Guarantee", with a view to guaranteeing access to six key services for "children in need":

- effective and free access to four services: high-quality early childhood education and care (ECEC); education and school-based activities; at least one healthy meal each school day; and healthcare; and
- effective access to two services: healthy nutrition and adequate housing.

The purpose of the present report is to assess the extent to which low-income children in Montenegro do indeed have effective (or effective and free) access to these services.

In Montenegro, the only poverty-targeted cash transfer is family support allowance, and those who receive this benefit may be considered low-income households. In addition, receipt of this benefit is a precondition for access to many other benefits or services.

ECEC is accessible to all children from birth until they enter primary school. The costs are met by parents, while for beneficiaries of family support allowance they are met by centres for social work. The rigid exclusionary criteria for family support allowance leave many other vulnerable households without free access to ECEC. There are different criteria for enrolment depending on whether demand for places exceeds supply; but those do not apply to recipients of family support allowance, who always have an advantage.

When it comes to education and school-based activities, only textbooks are free for all children in primary schools. All other materials must be paid for by parents. The mitigating circumstance is that schools do not require uniforms, while musical and sports equipment is provided within schools. Extramural activities are also paid for by parents. Poorer households, especially those who do not have access to social assistance, have difficulty covering the costs of transport, notebooks, school supplies and adequate clothes and shoes for children who attend school. Children in rural areas also face limited access due to remoteness.

Meals are not provided within schools in Montenegro. Some schools organise extended stays for children up to grade 3 of primary school. During these stays, meals are provided, but they are not free: they are paid for by the parents of all children, including recipients of family support allowance. As there is no school meals programme, children rely on snacks that they buy, which presents a financial burden for many parents.

Healthcare costs are fully free for all children (except dental care at secondary and tertiary levels, which are 80% free). However, for recipients of family support allowance, health services at all levels of healthcare are completely free.

The main barriers to healthy nutrition are financial. Healthy options are more expensive and even family support allowance is inadequate to meet basic needs. However, there is a lack of reliable and easily available information on healthy nutrition. National kitchens are the main support measure for healthy nutrition. Those are provided at the local level and cover recipients of family support allowance.

The only housing benefit provided at the national level is an electricity subsidy, which is available to recipients of family support allowance. Social housing programmes exist but are not systematically planned, and most of them are not focused on low-income households.

Introduction

On 14 June 2021, the EU Member States unanimously adopted the Council Recommendation (EU) 2021/1004 establishing a "European Child Guarantee" (ECG).¹

The objective of the ECG is to offset the impact of poverty on children and to prevent and combat their social exclusion. To this end, it is recommended that Member States guarantee for "children in need" (defined as people **under 18** who are at risk of poverty or social exclusion – AROPE):

- effective and free access to four services: high-quality early childhood education and care (ECEC); education and school-based activities;² at least one healthy meal each school day; and healthcare; and
- effective access to two services: healthy nutrition and adequate housing.

According to the ECG Recommendation, *effective access* means "a situation in which services are readily available, affordable, accessible, of good quality, provided in a timely manner, and where the potential users are aware of their existence, as well as of entitlements to use them" (Article 3d). *Effective and free access* means "effective access" to the services, as well as free-of-charge provision – either by organising and supplying such services or by providing "adequate benefits to cover the costs or the charges of the services, or in such a way that financial circumstances will not pose an obstacle to equal access" (Article 3e).

The Recommendation directs the Member States to prepare action plans, covering the period until 2030, to explain how they will implement the Recommendation.³ These plans are to be submitted to the European Commission.

The purpose of the present report is to assess the extent to which children AROPE have effective and free access to four of the six services covered by the ECG and effective access to the other two (see above). Given that the eligibility criterion (or criteria) for accessing those services in individual Member States (at national and/or sub-national level, depending on how the service is organised) is/are not based on the EU definition of the risk of poverty or social exclusion,⁴ the report focuses on access for **Iow-income children** to each of these services, using the national low-income criterion (or criteria) that apply (e.g. having a household income below a certain threshold or receiving the minimum income). Throughout this report, "low-income children" is to be understood as children living in low-income households.

In Montenegro all six services covered by the ECG are primarily regulated at the national level. Therefore, the report seeks to provide a general picture of the (effective/free) access for low-income children in the country.

¹ The full text of the ECG Recommendation is available at: <u>https://eur-lex.europa.eu/legal-</u> content/EN/TXT/?uri=uriserv%3AOJ.L_.2021.223.01.0014.01.ENG&toc=OJ%3AL%3A2021%3A223%3ATOC.

² According to the Recommendation (Article 3f), "school-based activities" means "*learning by means of sport, leisure or cultural activities that take place within or outside of regular school hours or are organised by the school community*".

³ Once they have been submitted to the European Commission, the plans are made publicly available online at: <u>https://ec.europa.eu/social/main.jsp?catId=1428&langId=en.</u>

⁴ According to the EU definition, children are AROPE if they live in a household that is at risk of poverty (below 60% of median income; hereafter AROP) and/or severely materially and socially deprived, and/or (quasi-)jobless. For the detailed definition of this indicator and all other EU social indicators agreed to date, see: https://ec.europa.eu/social/main.jsp?catld=756&langId=en. In 2021, EU Member States agreed a target to be reached by 2030: a reduction in the number of people AROPE in the EU by at least 15 million, including at least 5 million children.

The report is structured by service:

- effective and free access to high-quality ECEC;
- effective and free access to education and school-based activities;
- effective and free access to at least one healthy meal each school day;
- effective and free access to healthcare (e.g. free regular health examinations and follow-up treatment, and access to medicines, treatments and support);
- effective access to healthy nutrition;⁵ and
- effective access to adequate housing.⁶

1. Early childhood education and care (ECEC)

This section describes the situation regarding effective and free access for low-income children to ECEC services.

1.1 Mapping accessibility and affordability of ECEC

Childcare (usua	illy under age 3)	Pre-school setting (usually age 3 to compulsory school age)		
Accessibility	Affordability	Accessibility	Affordability	
ENT-ALL0year	FREE-POOR0year	ENT-ALL3years	FREE-POOR3years	

Table 1.1: Accessibility and affordability of ECEC

Note: "ENT-ALLxxx" means a legal entitlement for all children from the age of xxx. "FREE-POORxxx" means free for low-income children from the age of xxx. If the information differs between centre-based and home-based care, the information provided applies to centre-based care.

According to the Montenegrin Law on Pre-school Education, ECEC is equally accessible to every child without regard to sex, race, colour, language, religion, national/ethnic origin, disabilities, social origin or other personal characteristics or circumstances (see Table 1.1). It covers the period from birth until enrolment in primary school (usually at age 6). However, children's attendance at pre-schooling is still far from universal (Carraro *et al.*, 2021). The cost of accommodation and food in a public institution is determined based on the number of members in the household, the amount of income per household member, and the number of children from the household enrolled in the institution. Overall, the cost may vary between 100% and 80% of real costs. The cost is met by the parents. The costs for child beneficiaries of family support allowance are met by the local centres for social work.

1.1.1 Conditions for qualifying as a "low-income child"

Family support allowance is one of the basic social protection rights in Montenegro and is determined in relation to the income and property of all family members (defined by the Law on Social and Child Protection, adopted in 2013 and amended in 2021). Any family or family member shall be entitled to a family allowance if they: (a) are unable to work; (b) are able to work but are (i) pregnant; (ii) single parent; (iii) parent who supports a minor child, or an adult child unable to work whose inability to work occurred before age 18; (iv) have completed

⁵ According to the Recommendation (Article 3g), "healthy meal" or "healthy nutrition" means "a balanced meal consumption, which provides children with nutrients necessary for their physical and mental development and for physical activity that complies with their physiological needs".

⁶ According to the Recommendation (Article 3h), "adequate housing" means "a dwelling that meets the current national technical standards, is in a reasonable state of repair, provides a reasonable degree of thermal comfort, and is available and accessible at an affordable cost".

education under a programme with customised performance and additional professional support or under a special education programme; (v) aged 18 or above and in regular high school education (until the end of the term prescribed for that education) or (vi) a child without parental care, until the establishment of an employment relationship for a period longer than six months. A family needs to fulfil 15 criteria to exercise the right to family support allowance, among which are: (a) having an average net monthly income from the previous quarter below the defined threshold (\in 75.56 for one person monthly, or 17.0% of the current minimum wage of \in 450 in 2023); (b) not owning or having the beneficial use of business premises, residential premises, land or agricultural land; (c) not having a family member who has refused a job offer or vocational training, or who owns movable property. These households are considered as the most vulnerable households in the country. Children from these households have free preschool education and care, paid for by local centres for social work.

The Law on Pre-school Education also recognises children without parental care, as well as children from the most vulnerable groups of the population, as those who have free pre-school education.

1.2 Main barriers to effective and free access to ECEC for low-income children

1.2.1 Financial barriers

To become a beneficiary of family support allowance, a household must fulfil many conditions, among which only one is related to the level of income. For example, a household must prove that it does not have any property, which in practice leads to a situation in which households who have low income but own their apartment are not eligible. The combination of rigid exclusionary criteria and means-testing with a very low threshold is preventing poor households from receiving family support allowance (World Bank and UNICEF, 2022). If the household does not receive family support allowance, they are not eligible for free childcare.

1.2.2 Non-financial barriers

Enrolment in ECEC is based on different criteria if the number of available places is lower than the number of those who want to enrol. However, the enrolment of child beneficiaries of family support allowance is done without applying any criteria, and they have an advantage in the enrolment procedure.

However, a UNICEF study (Carraro *et al.*, 2021) showed that ECEC was not available to everyone in the same way, and that some children could not attend kindergartens because of the distance of the units from their homes or because of indirect costs of enrolment, such as transport and clothing, which they could not afford.

1.3 Free meals provision for low-income children in ECEC

Those children who are recipients of family support allowance have all meals free during ECEC if enrolled in a public institution. However, the nutritional quality of the meals could be improved (Carraro *et al.*, 2021).

2. Education and school-based activities

This section describes the situation regarding effective and free access for low-income children to education and school-based activities.

Section 2.1 maps the main school costs in public primary and secondary education, distinguishing between the following:⁷

- compulsory basic school materials (schoolbag, pens, glue, scissors, etc.);
- compulsory school materials (textbooks, school supplies, notebooks, etc.);
- compulsory specific clothing (uniform, sports clothing);
- IT equipment requested by the school;
- sports equipment or musical instruments requested by the school;
- compulsory extramural activities (e.g. school trips, sport, culture) that are part of the curriculum;
- other compulsory fees or costs; and
- transport costs to or from school.

Section 2.2 briefly describes the cash benefits specifically intended to help meet educational costs.

Finally, Section 2.3 seeks to identify the main barriers that prevent low-income children from having effective and free access to "school-based activities" as defined in the Council Recommendation establishing the ECG (see "Introduction" section). Given that the distinction between these activities and some of the activities covered above – especially the "compulsory extramural activities (e.g. school trips, sport, culture) that are part of the curriculum" – may not always be clear-cut, the focus of Section 2.3 is specifically on school-based activities which are not part of the curriculum.

2.1 Mapping the main school costs in public primary and secondary education

Basic material	Books	Clothing	ІТ	Sports or music equipment	Extra- mural activities	Other fees or costs	Transport
NO	MOST ITEMS	NO	NO	NO	NO	NO	NO

Table 2.1a: School costs of primary education (free for all/low-income children)

Note: "MOST ITEMS" means that most but not all items in the category are free for low-income children, "NO" means that most/all items in the category are not free for low-income children.

Costs for basic school materials are covered by parents. All primary school students have free textbooks provided by the Montenegrin Ministry of Education (since 2021 it has been regulated by national law). However, other school materials that are compulsory, such as notebooks, are not provided and the cost for those must be covered by the parents of all students including low-income children (see Table 2.1a). No public schools have uniforms. In the case of sport activities, certain clothes are sometimes required by the school/teacher, and the costs are covered by the parents. There is no IT equipment that is compulsory, but it is needed for IT homework in many cases. Music and sports equipment is usually provided within the school. The costs of extramural activities should by law be covered by the school, but in practice they are met by parents, despite it being forbidden by the regulation.

⁷ Tuition fees charged by private schools are not covered.

To conclude, apart from free textbooks and the costs of extramural activities, the national legislation does not define any other form of regular assistance for any children including low-income ones. In practice, only textbooks are free for all children.

According to a UNICEF report on multidimensional child poverty in Montenegro (Carraro *et al.*, 2021), poorer families – especially those who do not have access to social assistance – faced financial obstacles during education, and reported that they had difficulty covering additional indirect costs, such as for transport, books, school supplies and adequate clothes and shoes for children who attend school. The report therefore identified financial barriers as a key factor that disrupted school attendance. In addition, the COVID-19 situation, during which education was organised online, showed that many students were facing difficulties in following educational programmes due to a lack of equipment or internet access.

The UNICEF study mentioned (Carraro *et al.*, 2021) emphasised regional disparities between rural and urban areas. It found that the remoteness of many rural places negatively affected children's access to educational institutions, especially primary schools. Public transport was often inaccessible or unavailable, forcing many children to walk to school. The report noted that walking long distances was dangerous for children (it involved travelling on busy roads without pavements, in bad weather and through areas with dangerous animals), and these worries often led to absenteeism from school, especially among younger children.

Table 2.1b: School costs of secondary education (free for all/low-income children)

Basic material	Books	Clothing	іт	Sports or music equipment	Extra- mural activities	Other fees or costs	Transport
NO	NO	NO	NO	NO	NO	NO	NO

Note: "NO" means that most/all items in the category are not free for low-income children.

The situation is the same as in the case of primary school education, apart from textbooks, which are not free in secondary education (see Table 2.1.b).

2.1.1 Conditions for qualifying as a "low-income child"

Same as under 1.1.1.

2.2 Cash benefits whose specific purpose is to help meet educational costs

The national 2013 Law on Social and Child Protection defines one-time financial assistance as support to an individual or family in a situation of social need due to special circumstances affecting their housing, material status or health. The amount of assistance is determined by the centre for social work, depending on the needs of the individual and the financial means of the state. This assistance is not specifically defined as help to meet educational needs but may be used for this purpose.

National legislation also opens the possibility for local authorities to help and support families and children if they have budgetary resources. Some local authorities (municipalities) use this possibility and provide, from local budgets, funds for transport, notebooks and other school materials to vulnerable groups within their territory. Those groups usually include low-income children (i.e. beneficiaries of family support allowance). Types of financial benefits, conditions, methods and procedures for exercising the right to those benefits are prescribed by each municipality. However, these decisions are made on an annual basis and do not represent permanent support. There are no studies/data analysing whether the benefits adequately cover the educational costs for low-income children. There are no other cash benefits to help other specific groups of children to meet educational costs.

2.3 Main barriers to effective and free access to school-based activities for low-income children

2.3.1 Financial barriers

There are no studies/data analysing financial barriers to effective and free access to schoolbased activities for low-income children.

2.3.2 Non-financial barriers

There are no studies/data analysing non-financial barriers to effective and free access to school-based activities for low-income children.

3. Free meals at school

This section describes the situation regarding effective and free access for low-income children to at least one free healthy meal each school day.

3.1 Mapping free provision of school meals

In general, meals are not provided to students within primary and secondary schools in Montenegro. Meals are provided only for grade 1-3 primary school students in extended stays. This service is available in a very limited number of schools in big urban areas. In addition, meals provided during this stay are not free, and are paid for by the parents of all children including low-income ones. There is no regulation of the nutritional values of those meals.

3.1.1 Conditions for qualifying as a "low-income child"

Not applicable.

3.2 Main barriers to effective and free access to school meals for low-income children

3.2.1 Financial barriers

Since there is no adequate school meal programme, children are forced to rely on school snacks and junk food. As stated in the UNICEF report (Carraro *et al.*, 2021), a large number of parents claimed that it was a problem for them to allocate money for their children's meals every day (€1-2 daily). In addition, poor families found healthy food to be largely unaffordable, and thus typically opted for less healthy choices.

3.2.2 Non-financial barriers

According to the UNICEF report (Carraro *et al.*, 2021), bringing snacks prepared at home was considered socially unacceptable and a sign of poverty. The study reported that children who were unable to afford school snacks and/or supermarket treats reportedly felt ashamed and refused to eat home-prepared food.

4. Healthcare

This section describes the situation regarding effective and free access for low-income children to healthcare, focusing on vaccinations, care from a general practitioner (GP) or infant nurses, specialist care, dental care (not orthodontics) and prescribed medicines.

4.1 Mapping the provision of free healthcare services and products

Vaccination	GP	Infant nurses	Specialist care	Dental care (not orthodontics)	Prescribed medicines
ALL	ALL	ALL	ALL	POOR	ALL

 Table 4.1: Healthcare costs (free for all/low-income children)

Note: "ALL" means that all services/products in the category are free for all children. "POOR" means that they are free for low-income children.

The right to healthcare is provided to all children (see Table 4.1). Examinations by the selected doctor (paediatrician) are part of the right to healthcare and are provided free to all children. Home-visits for children are also part of the right to healthcare and are free. Vaccination is available and free for all children, including children from low-income households. In accordance with healthcare law, dental healthcare at all levels is fully covered by insurance for beneficiaries of family support allowance. For other children, dental care at the primary school level is 100% covered by insurance, and 80% covered at secondary and tertiary levels. Prescribed medicines from the basic list of medicines and the supplementary list of medicines are free for all children.

4.1.1 Conditions for qualifying as a "low-income child"

Not applicable.

4.2 Cash benefits whose specific purpose is to help meet healthcare costs

There are no cash benefits for healthcare in Montenegro, as healthcare for children is free. There are no reports on out-of-pocket spending for child healthcare. However, according to the "Health System in Action" report for Montenegro published by the World Health Organization in 2022 (WHO, 2022), people faced high out-of-pocket payments, representing 39% of current spending on health in 2019. The high levels of out-of-pocket payments for health services contributed to catastrophic health spending in Montenegro. The report stated that, in 2017, nearly 10% of households reported catastrophic health spending, which is particularly problematic for poorer households and can lead to further impoverishment.

4.3 Non-financial barriers to effective and free access to healthcare

The UNICEF study (Carraro *et al.*, 2021) showed that heavy work burdens were also reported to constrain parents from seeking healthcare for their sick children, while the cumbersome administrative procedures and paperwork needed to access health services could further restrict child visits to paediatricians. The study mentioned that evidence also showed that children living in rural regions faced poorer access to health services and paediatricians, as a

result of spatial inequalities. Particularly evident were differences between the capital (Podgorica) and other municipalities, especially in the northern region. Parents reported limited numbers of paediatricians in the north, leading to long wait times or the need to seek healthcare elsewhere, which was financially problematic for poor families.

5. Healthy nutrition

This section describes the situation regarding effective access for low-income children to healthy nutrition.

5.1 Main barriers to effective access to healthy nutrition

5.1.1 Financial barriers

The UNICEF study (Carraro *et al.*, 2021) concluded that nutritional deprivation for children aged 5-17 manifested itself more in the poor quality of food consumed and limited dietary diversity than in food insecurity and hunger. According to the report, poor households found healthy food to be largely unaffordable, and thus typically opted for less healthy choices, which usually resulted in diets that were limited in diversity and quality. For younger children, the high deprivation level registered for nutrition resulted from the large proportion of children who were not exclusively breastfed (64% of children aged 0-6 months), combined with shortfalls in infant feeding patterns, including limited dietary diversity and inadequate meal frequency for children aged 6-23 months.

In addition, a social protection situation analysis (World Bank and UNICEF, 2022) concluded that family support allowance was inadequate for households that relied solely on this programme as their source of income to meet their basic needs.

5.1.2 Non-financial barriers

A UNICEF situation analysis of children and adolescents in Montenegro (UNICEF, 2021), stated that, according to MICS⁸ 2018, 7.3% of children under 5 were overweight. In 2016, a study of children aged 7 carried out using WHO methodology classified 18% of both boys and girls as overweight. The reports said that nutrition problems were also evident among older children, as parents could lose control over their children's diets, and children might insist on eating fast food, in part due to peer pressure. In addition, the report noted that there was a lack of information on micro-nutrient deficiencies and insufficient provision of counselling to parents on child nutrition.

5.2 Publicly funded measures supporting access to healthy nutrition

There are no publicly funded measures supporting access to healthy nutrition in Montenegro implemented at the national level. Several national kitchens have been established, provided and funded locally, by municipalities and local centres for social work. For example, the national kitchen in the capital, Podgorica, was opened in 2011 and provides its services to socially disadvantaged households. Similar kitchens are available in several other municipalities, such as Niksic and Budva. However, the most disadvantaged northern region

⁸ Multiple indicator cluster survey.

lacks this kind of service. The conditions for use of national kitchens are defined by each local authority: but in most cases the right to a free meal is available to the beneficiaries of family support allowance and personal disability benefits, as well as people with the lowest pensions. Priority for meals is given to single people who are unable to prepare a meal due to a permanent change in their health condition, and people without residence or accommodation. For citizens to use the services of national kitchens, they must submit several documents (such as proof of residence, proof of the number of members of the household, and proof that they are recipients of social benefits).

There are also some other initiatives aimed at providing meals to citizens in need, implemented and financed by international or local non-government organisations or religious organisations.

6. Adequate housing

This section describes the situation regarding effective access for low-income children to adequate housing.

6.1 Publicly funded measures supporting access to adequate housing – Housing allowances

The UNICEF study on multidimensional poverty (Carraro *et al.*, 2021) showed that about 44% of children lived in a household reporting multiple housing problems or overcrowding. In the qualitative survey, respondents often described their housing as poor and inadequate. In addition, about 1 out of 3 children were living in a household where the parents experienced problems in being able to afford the cost of utilities. In addition, most parents surveyed for the study spoke extensively about their difficulties paying bills for electricity, fuel and other living costs.

The only housing benefit provided at the national level is the electricity subsidy. However, there are no data or studies analysing whether these benefits adequately cover the housing costs for low-income households with children.

In accordance with the 2016 Energy Law, in November 2018 the government of Montenegro passed the Regulation on the Supply of Vulnerable Consumers with Electricity. According to this regulation, only citizens who are living in a household that exercises the right to family support allowance, and at the same time the right to an attendance allowance or a personal disability allowance, are entitled to a subsidy of 50% of the monthly electricity bill up to 600 kWh. If the consumption is higher than 600 kWh, only the cost corresponding to 300 kWh is subsidised (50% of 600 kWh). In addition, for those households, as well as for households who are only beneficiaries of family support allowance, the electricity supply cannot be suspended during the period from October until the end of April, regardless of any unpaid bills.

Considering that the 2018 regulation is restrictive in terms of vulnerable categories covered, the government of Montenegro adopted a subsidy programme in 2021, which was also implemented in 2022 and 2023.

According to the new programme, the right to receive subsidised electricity bills, besides those eligible according to the 2018 regulation, is accorded to those households who are beneficiaries of only family support allowance. The subsidy is 40% if the value of the monthly electricity bill is up to €60, or a fixed subsidy of €24 monthly if the bill is more than €60.

6.2 Publicly funded measures supporting access to adequate housing – Social housing

6.2.1 Mapping the provision of social housing

The government of Montenegro is working on new drafts of the national housing strategy for 2021-2030, the social housing programme for 2021-2024 and the social housing law. According to the applicable law from 2013, priority in exercising the right to social housing is granted to single parents, people with disabilities, people over 67, young people who were previously children without parental care, families with children, members of the Roma and Egyptian population, and displaced people.

At the local level, the most important measure in the area of social housing is the local social housing programme. The 2013 Law on Social Housing requires all municipalities to adopt yearly housing programmes, with the approval of the Ministry of Sustainable Development and Tourism. In practice, only a small number of municipalities have local programmes (ADPZID, 2019). In addition, most municipalities lack the financial means to implement housing programmes or to maintain already existing social housing premises.

6.2.2 Main barriers to effective access to social housing

6.2.2.1 Financial barriers

Out of five social national housing programmes implemented up to the end of 2020 (in accordance with the national housing strategy for 2011-2020), only one targeted socially vulnerable people (Kaluđerović and Đurović, 2019). The majority of programmes were for people employed in the public sector, who were given the possibility to purchase or rent accommodation under favourable conditions, which meant that they were not accessible to low-income households.

6.2.2.2 Non-financial barriers

Studies have suggested that housing programmes lacked organised planning and monitoring procedures (Kaluđerović and Đurović, 2019) and permanent financial resources (ADPZID, 2019). As most housing programmes exclude most vulnerable households, their housing status is usually resolved ad hoc when the situation becomes unbearable. Such unplanned, ad hoc, and urgent construction work leaves many unresolved issues for households, such as definition of ownership rights, registration of housing units, maintenance, and payment of minimum fees established by law (ADPZID, 2019).

6.3 Publicly funded measures supporting access to adequate housing – Other measures

There are no other measures that support access to adequate housing for low-income households with children in Montenegro.

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