

EAPN contribution to the European Commission consultation on the 2026 – 2030 EU Anti-Racism Strategy

Amplifying the social-economic rights of racialised communities

JULY 2025

This document outlines EAPN's recommendations on the 2026-2030 EU anti-racism strategy in the context of the online public consultation carried on by the European Commission. Most of these recommendations are taken from EAPN's position paper <u>Towards the Eradication of Poverty - EAPN vision and recommendations for the EU Anti-Poverty Strategy</u>.

CONTEXT¹

For the EU consultation on the upcoming Anti-Racism Strategy, it is essential to emphasize the intersection of racism and poverty. For EAPN, structural and institutional racism reinforces social exclusion and economic disadvantage. One of the clearest impacts of this systemic inequality is poverty, with racialised people being disproportionately more likely to be living in the grip of poverty across Europe. In key areas like health, employment, housing, social security and social assistance, education, culture, and access to justice, racialised individuals and communities are confronted with structural discrimination and exclusion.

Historically, racism and poverty are intertwined and tackling one requires addressing the other, as all root causes of oppression. EAPN emphasizes the need to combat racial inequalities alongside poverty, acknowledging that racial disparities exist within economic, political, and social systems. Mainstreaming racial equality is important to identify the **color-blindness** of social policies but it can only be efficient if the upcoming anti-racism framework addresses the **class-blindness** of the anti-discrimination strategies. Therefore, anti-racism efforts must incorporate an anti-poverty lens to be meaningful and effective.

At EAPN, we identify invisible communities as the "missing poor", which refers to those who are ignored in traditional poverty statistics, includes the following groups: racialised people, Roma people, people in informal or undeclared work, homeless people experiencing multiple

¹ https://www.eapn.eu/towards-the-eradication-of-poverty-paper-out-now/



grounds of discrimination, undocumented migrants, refugees and asylum seekers, institutionalised individuals, and people deprived of liberty.

According to the <u>EU MIDIS II</u>, 80% of Roma live below their country's at-risk-of-poverty threshold, compared with 17% of the general population. Furthermore, 14% of Black people or People of African Descent were denied housing by private landlords due to ethnic origin. <u>Muslims</u> are more likely to live in poverty, overcrowded housing, on temporary contracts, and leave school early (often three times more likely than the general population). According to <u>Eurostat</u>, around 45% of non-EU citizens face this risk compared to 26% of EU-citizens and 20% native-born. While official statistics highlight poverty levels for some groups in society, many groups disproportionately affected by poverty and social exclusion are not included in these statistics due to the size of the population used. This includes people with disabilities, Travellers, Roma, migrants, racialised groups and other ethnic minorities, and people experiencing homelessness. Current data is not enough and does not portray the multidimensional aspects of social exclusion: there is a lack of statistics and disaggregated data on the intersection of race and poverty which needs to be further addressed.

Poverty and racial inequality are inextricably linked, and there can be no racial justice without socio-economic justice.

THE 2020 – 2025 EU ANTI-RACISM ACTION PLAN AND THE IMPACT ON SOCIO-ECONOMIC RIGHTS

The 2020 - 2025 EU Anti-Racism Action Plan (EU ARAP) represented a significant milestone in advancing racial justice initiatives across Europe. Following the global momentum generated by the Black Lives Matter movement, the plan recognised historic injustices resulting from various systems of oppression and articulated the European Commission's commitment to addressing structural and systemic racism through an intersectional framework.

Nevertheless, the translation of this ambition into concrete measures and targets has not fully realised its original intention. The EU ARAP did not sufficiently introduce a shift of paradigm nor establish a framework able to decolonise racial and social policies through a transformative justice lens. While there were notable conceptual efforts to embed racial equality considerations into all EU policy areas, legislation, and funding programmes (including social inclusion, artificial intelligence, environmental sustainability, digital inclusion, combating hate speech, and migration policies), the action plan did not effectively anticipate gaps and inconsistencies prevalent in the European Union's complex and fragmented policy landscape.



To illustrate these challenges, EAPN highlights how employment, education, health, and housing measures were redirected under the European Pillar of Social Rights (EPSR) Action Plan, based on the assumption that the social inclusion of racialised minorities would be better integrated within this context. One main concern is the interpretation of mainstreaming and intersectionality. While it is essential for racial perspectives to be incorporated into broader policies, it is equally important for the anti-racism agenda to integrate socio-economic, environmental, digital, and other relevant objectives. Mainstreaming should strive to ensure visibility, and intersectionality demands the establishment of specific and appropriate goals for those who are most vulnerable. However, similar mainstreaming efforts were not consistently observed within the EU ARAP, resulting in insufficient attention to class, gender, economic status, digital access, and the diverse experiences of exclusion among racialised minorities.

Specifically, EAPN notes that the following policy domains have not substantially improved the socio-economic circumstances of racialised individuals living in or at risk of poverty. EAPN is using the structure proposed in the previous EU ARAP action plan when it intersects with social and economic aspects:

Employment

The EU ARAP concentrated on a Council Recommendation regarding vocational education and training. However, Equavet monitoring mechanisms currently track only gender and age indicators. Beyond this, the reinforced Youth Guarantee is monitored by the NEET indicators, yet no data relating specifically to race or ethnic groups is collected. Furthermore, the European Network of Public Employment Services (PES), is seen as a contributor to the EU ARAP. However, EAPN reports and UN Rapporteur on Human Rights and on Extreme Poverty have reported increasing non-participation rates among racialised communities, which remain unaddressed in statistical reporting. The 2021 European Action Plan for the social economy references only once, racial groups in the concept paper but lacks the implementation of targeted measures.

Education

The Digital Education Action Plan (2021–2027) addresses non-discrimination primarily in relation to gender equality and does not engage with the unique needs of racialised groups.

Health

The EU4Health programme references "vulnerable groups" without defining the term or legally recognising their status. The EU Health Policy Platform discussed anti-racism and anti-



discrimination only once in its annual meeting since inception, with no substantive follow-up. The Commission Steering Group on health promotion, disease prevention, and management of noncommunicable diseases rarely considers vulnerability, racial minority status, or discrimination in expert discussions and reporting.

Housing

Cohesion Policy funds are intended to support vulnerable populations and reduce inequalities across regions within the EU. However, not all Member States benefit from all four funding streams (ERDF, CF, ESF+, Just Transition). The Monitoring Report of 27 February 2025 includes no race-specific indicators and contains only a few references to Roma populations, with limited dedicated actions.

Al and Digital Inclusion²

The EU ARAP recognises that technology can perpetuate racial inequalities if inadequately regulated. Though the plan highlights the need to address online hate speech, disinformation, and algorithmic discrimination, a comprehensive understanding of these issues remains lacking. EAPN's research has examined the impact of digitalisation (through an intersectional, socioeconomic, and social justice lens) on access to essential services for those experiencing poverty. The findings indicate that digital-only systems increase marginalisation and that automated social protection systems have significant consequences for individuals' lives. Furthermore, the assumption that digitalisation inherently enhances welfare state efficiency often overlooks critical factors such as accountability, transparency, and privacy rights. There is growing evidence of digitally induced poverty and concerns regarding the automation of discrimination via AI. While digital tools promise improved efficiency in public administration, they risk facilitating austerity measures and diminishing human oversight. In this spectrum, there is no data or statistics on beneficiaries from racialised backgrounds.

CONCLUSION

 $^{^{2}\,\}mbox{https://www.eapn.eu/an-exploratory-study-on-the-use-of-digital-tools-by-people-experiencing-poverty/}$



EAPN believes that the integration of racial equality considerations in policy language has not been matched by concrete actions, resulting in insufficient progress toward addressing the socio-economic challenges faced by racialised populations.

MISSING POOR: THE CASE OF RACIALISED PEOPLE EXPERIENCING POVERTY AND SOCIAL EXCLUSION³

EAPN highlights that racism and poverty are not only a matter of individual perspectives but are deeply embedded in structures which shape access to rights, resources, and opportunities. Racialised communities face disproportionate levels of poverty due to systemic barriers in education, employment, housing, healthcare, and social protection. These patterns are reinforced by racist policies, discriminatory policing, and unequal treatment in welfare systems.

In this context, when dealing with a Europe focus on employment, competitiveness and preparedness, it is crucial to recall that the principle of active inclusion should go beyond the integration in the labour market. **Active inclusion** should be combined with adequate income and full access to essential services.

At the EU level, the notions of absolute and relative poverty are both used to describe poverty. Since 2010, the composite notion of Risk of Poverty or Social Exclusion, which brings together relative monetary poverty, material deprivation and exclusion from the labour market, is also used. With the adoption of the European Pillar of Social Rights (EPRS) Action Plan, Member States committed to a shared objective of reducing by 2030 of at least 15 million the number of people at risk of poverty or social exclusion (AROPE). However, according to the last Eurostat statistics, in 2024, at least 93.3 million people in the EU were living at risk of poverty or social exclusion. We are talking about 21% of the EU population, 1 in every 5 people. Comparing to the 94.6 million people in 2023, this represents a decrease of approximately of 1.3%. Europe remains far from meeting the 2030 targets for poverty reduction of 15 million people, as well as the UN Sustainable Development Goals to eradicate all forms of poverty. This insignificant progress shows that EU measures are delivering poor results to end poverty, and it will impact drastically the socio-economic conditions of racialised groups.

The economic conditions of **racialised women** have worsened by their lower wages and extra caring responsibilities, and they are more likely to have a part-time or temporary job. Pensions

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³ https://www.eapn.eu/wp-content/uploads/2024/10/eapn-EU-poverty-watch-2023-5986.pdf



also remain a challenge for them "because of the persistent earnings gap and the different distribution of care tasks between parents" (OECD 2020).

Poverty is also widespread among **racialised young adults** and people with a low level of educational attainment. The higher the rate of poverty is in an area, the higher the level of education and professional training will be. The data, in fact, show how economic poverty and educational poverty feed each other, because the lack of cultural means and social networks also reduces employment opportunities. This leads to intergenerational poverty, having economic, educational, cultural and social inequalities passed down from parents to children.

When it comes to **racialised children**, the most vulnerable ones are those living in large families, those in rural households, and in Roma settlements. There are many underlying causes in child poverty such as lone parenthood, unemployment, gender, racial and ethnic origin.

Other groups vulnerable to poverty and social exclusion are the **racialised elderly**. In Finland, EAPN member underlines that major cause of pensioner poverty is the cost of being sick and the increased need for basic services.

Moreover, **unemployment** continues to be a prominent factor of great vulnerability to poverty in Europe. Migrants, ethnic minorities, and people of African descent face significantly higher unemployment rates compared to the general population in many European countries. Studies and reports indicate that individuals from these groups often encounter discrimination during the hiring process, making it harder to find employment. **Racialised workers** may face limited access to training, education, and career advancement opportunities, further contributing to their unemployment challenges. Racialised groups may face limited access to training, education, and career advancement opportunities, further contributing to their unemployment challenges. ⁴

To secure a descent active inclusive for racialised groups, Minimum Income Schemes (MIS) can serve as safety net for racialised people living in poverty. However, racialised groups often face barriers to access services and income support or struggle with discriminatory policies' implementation in practice. EAPN has shed light on the increase rate of **non-take-up**. Non-take-

⁴ https://fra.europa.eu/en/publication/2023/being-black-eu#:~:text=Second%20European%20Union%20Minorities%20and,all%2028%20EU%20Member%20States.



up refers to people who are eligible for social benefits or services but access them due to administrative barriers, lack of information, stigmatisation for instance For racialised groups, this happens disproportionately due to structural, institutional, and systemic discrimination. Many MIS exclude undocumented migrants, and some exclude non-EU nationals or people who haven't met long and strict residency or work history requirements. Roma people often face challenges proving residence, income, or documentation needed to qualify. Frontline workers may apply discretion in ways that disadvantage racialised beneficiaries, such as overscrutinising requests for benefit support and requiring additional documentation, which are not even necessary. The SIRI case in the Netherlands remains a pivotal case study in this analysis.⁵

The situation of extreme poverty also needs to be addressed in the future Anti-Racism and Anti-Poverty Strategies. **Homelessness** is a major factor of exclusion and access to housing is fundamental to fight against it. Some publications draw attention to the overrepresentation of certain racial and ethnic groups among people experiencing homelessness in Europe. ⁶

As a result of all these experiences of economic deprivation and social exclusion, addressing the **criminalisation of poverty and racism impacting racialised groups** should be a main topic of social and racial policies alignment. The criminalisation of poverty can also happen indirectly, for instance, through fines for minor offences such as fare evasion on public transport. Racialised people, Roma people, and other ethnic minorities are more frequently stopped, searched, arrested and subjected to police brutality, especially in disadvantaged areas.

EAPN RECOMMENDATIONS: ENSURING SYNERGIES BETWEEN THE UNION OF EQUALITY, INCLUDING THE UPCOMING EU ANTI-RACISM & ANTI-POVERTY STRATEGIES⁷

⁵ https://www.eapn.eu/an-exploratory-study-on-the-use-of-digital-tools-by-people-experiencing-poverty/

⁶ https://www.feantsa.org/en/newsletter/2020/12/18/homeless-in-europe-magazine-winter-2020#:~:text=Militarized%20operations%20were%20registered%20in,sleep%20when%20we%20get%20 here!%22

⁷ These recommendations are extracted from EAPN's position paper "Towards the eradication of poverty" (April 2025): https://www.eapn.eu/towards-the-eradication-of-poverty-paper-out-now/



Under the Anti-Racism Framework

1. Improve Poverty Measurement through Participatory and Inclusive Data Collection

Current data tools like EU—SILC are insufficient in capturing the full lived experience of poverty, particularly regarding hidden forms of deprivation such as housing insecurity, stigma, and social exclusion. EAPN recommends that the European Commission establish a **dedicated working group.** This should include people with direct experience of poverty, academics, Eurostat, FRA, EIGE, national statistics offices, policy makers, civil society and practitioners, aiming to co-develop an updated poverty and social exclusion measurement tool by the end of the current European Commission mandate.

2. Shift the Narrative Around Poverty

Racism and stigma against people living in poverty perpetuate exclusion and non-take-up of rights. The EU Anti-Racism Strategy should be aligned and bilaterally mainstreaming with the Anti-Poverty Strategy to actively challenge negative narratives by framing minimum income and social protection as fundamental rights, not conditional benefits. Another important aspect is the institutional recognition that poverty stigma and structural discrimination are combined. The narrative of change should include

Introducing socio-economic status as a recognised and combined ground of discrimination under EU law to protect people in areas such as employment, housing, education, access to services, to the digital, to the green transition and beyond.

3. Promote Robust National and Local Anti-Poverty Strategies

EAPN urges all EU Member States and candidate countries to **adopt and implement comprehensive national and local anti-poverty strategies** in alignment with the overarching EU Anti-Poverty Strategy, ensuring a coherent, multilevel governance approach.

4. Protect the Rights of Migrants, Asylum Seekers, and Undocumented People

The EU Anti-Poverty Strategy must be truly inclusive and uphold the rights of **all people experiencing poverty**, regardless of their **residence or documentation status**. EAPN urges the European Commission and Member States to ensure that **migration policies guarantee full**

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access to residence permits, social protection, the labour market, and essential services, without discrimination based on legal status.

Access to essential services must be universal and non-discriminatory, ensuring that no one is excluded from healthcare, housing, education, or social support due to their migration status. In the context of the upcoming Multiannual Financial Framework (post-2027), the EU must provide targeted funding to support community-based initiatives that address the needs of vulnerable migrants and asylum seekers. Additionally, ESF+ resources must remain accessible to non-EU citizens, ensuring that all those in need can benefit from EU-funded anti-poverty measures. All migrant workers must be guaranteed equal labour rights and unrestricted access to the labour market to ensure fair treatment and full social inclusion, regardless of their residence status.

5. Legally Recognise Socio-Economic Discrimination

PN calls on the EU to develop an EU-wide legal framework that explicitly recognises socio-economic status as a ground for discrimination. It also urges the EU to fund and mandate the EU Agency for Fundamental Rights (FRA) to carry out dedicated research on socio-economic discrimination to support evidence-based legal and policy reforms.

Under the Socio-Economic Framework

6. Address Homelessness and Severe Material Deprivation

To align with Principle 19 of the European Pillar of Social Rights (EPSR), the EU must intensify efforts to eliminate homelessness and material deprivation by integrating homelessness prevention and anti-poverty measures across all major equality and inclusion strategies. This includes the EU Gender Equality Strategy, the LGBTIQ+ Equality Strategy, the post-2025 Anti-Racism Action Plan, the Disability Strategy 2021–2030, the Migration Pact, and the Action Plan for Integration and Inclusion. These initiatives should ensure access to adequate housing, emergency support, and inclusive pathways for people experiencing severe poverty and social exclusion.

7. Addressing Intersectional Poverty

Future equality strategies must coordinate with the EU Anti-Poverty Strategy (APS) and include both dedicated racial sections and a cross-cutting anti-poverty lens. Intersectionality should be reflected in the **Social Scoreboard**, by Including the EIGE's Gender Equality Index and FRA



thematic reports such as on Muslims, Migrants, Roma and Ethnic groups. Moreover, the introduction of indicators on intersectional racial capitalism and poverty could be helpful

8. Ensuring Adequate and Accessible Income

Targeted measures for racialised groups are so far inexistent. Future schemes must address the non-take-up of Minimum Income Schemes (MIS) and ensure their adequacy, accessibility, and enabling features for racialised minorities, including:

- Use of the post-2027 Multiannual Financial Framework (MFF) to fund MIS reforms with targeted measures for racial and other communities disproportionally affected by poverty and social exclusion
- Tax reforms to sustainably finance social protection
- Coverage of pensions under MIS schemes with specific targets for racialised groups at risk of poverty
- Automatic adjustments of social benefits to inflation for racialised groups
- Closing the racial pension gap in coordination with all EU policies on retirement income
- Full implementation of the June 2024 Council conclusions on pension adequacy with specific and restorative targets for racialised communities

9. Transforming the European Semester into a Social Semester

To align economic governance with social goals, the EU must exempt social and environmental investments from the 3% deficit-to-GDP limit set by the Stability and Growth Pact, establishing an Anti-Poverty Golden Rule in EU law. The European Semester should place poverty eradication at its core, promoting robust investment in education, healthcare, social protection, and inclusion, including targeted goals on Country Specific Recommendations (CSR). CSR should adapt to social and economic targets aiming at racialised groups (so far invisible of statistics and indicators). Additionally, civil society and marginalised communities must be meaningfully involved throughout the Semester process to ensure transparency, accountability, and democratic participation.

CONCLUSION



The eradication of poverty is a matter of human rights and democratic legitimacy. The EU must lead by example by embedding anti-poverty and anti-discrimination principles across all its strategies, funding mechanisms, and legal instruments. These recommendations offer a pathway toward a just, inclusive, and resilient Europe: where no one, including the invisible missing racialised group, is left behind.

About EAPN – European Anti-Poverty Network

The European Anti-Poverty Network (EAPN) is the largest European network of national, regional, and local networks, bringing together anti-poverty NGOs and grassroots groups as well as European organisations active in the fight against poverty and social exclusion. Together, we defend the rights of people experiencing poverty and ensure their active participation in the EU decision-making process.



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