



EU Gender Equality Strategy 2026–2030

European Anti-Poverty Network (EAPN) submission to the “Have your say – Public Consultation” on the EU Gender Equality 2026-2030

Introduction

The [European Anti-Poverty Network \(EAPN\)](#) is the largest European network of grassroots organizations and individuals working to combat poverty and social exclusion.

EAPN believes that **gender inequality and poverty eradication are intrinsically linked and must be tackled together**. Poverty is not simply a matter of individual misfortune. It is rooted in systemic injustice, unequal power relations, and the historically unequal distribution of wealth and resources. These structures are reinforced by discrimination based on gender, gender identity and expression, race and ethnicity, religion, age, migration status, disability, and sexual orientation.

On gender and terminology

In this paper, we will try to adopt an inclusive understanding of gender equality, one that goes beyond formal equality to address systemic power imbalances, the unequal distribution of resources, and the structural and systemic barriers faced by those most marginalized.

When we say “*women*,” we mean **all wxmen**, including cis and trans women, as well as others whose experiences of gendered poverty and discrimination align with those faced by women and girls. We also refer to “**non-binary people**”, and at times use broader terms such as “**FLINTA**” (an acronym used in some European contexts to include women, lesbians, intersex, non-binary, trans, and agender people). These terms reflect our commitment to acknowledging the full spectrum of gender identities impacted by inequality.

However, our analysis is constrained by a lack of disaggregated and intersectional data and fragmented policy frameworks, particularly concerning trans and non-binary people, as well as individuals facing overlapping forms of marginalization (e.g. due to race, migration status, or disability). We recognize that existing data and policy frameworks often fail to reflect the lived realities of all gender identities.

This invisibilization and fragmentation contributes to the **erasure of specific needs and experiences from social protection systems, poverty reduction strategies, and broader development policies**. It also reinforces a binary and narrow understanding of gender that can exclude those most at risk of economic and social marginalization.

Amongst wxmen, the causes of poverty are numerous and include lower employment rates, wage gaps and intra-household distribution of resources guided by patriarchal values. To this list should be added unequal access to property, career interruptions due to the disproportionate burden of care placed on wxmen, precarious contracts and lower work intensity, the depreciation of academic fields and labour market sectors traditionally occupied by wxmen (which are in turn less well-rewarded), the lack of recognition and financial compensation for domestic labour, family and community care performed by wxmen.

Putting “missing wxmen” at the centre of the strategy

Wxmen and LGBTIQ+ individuals often experience poverty at the intersection of several forms of discrimination. **Failing to address the critical intersection between poverty and discrimination undermines the effectiveness of policies aimed at preventing and eradicating poverty.** Without an intersectional approach within the EU Anti-Poverty Strategy, structural inequalities that disproportionately affect marginalized groups, such as racialized people, persons with disabilities, migrants, and LGBTQIA+ communities, remain unchallenged, perpetuating cycles of exclusion and economic insecurity.

In 2020, 22.9% of women were at risk of poverty or social exclusion compared to 20.9% of men¹. Disproportionally invisible from the debate gender equality are some of the most vulnerable wxmen in Europe: Roma wxmen, migrant wxmen, wxmen experiencing homelessness, and wxmen with disabilities are the most underrepresented from statistics and policies as they face intertwined risks of poverty and social exclusion.

This analysis adopts an intersectional approach, placing those at the margins at the centre. By focusing on the specific experiences of FLINTA who face intersecting forms of discrimination, we aim to highlight the ways in which gendered poverty is compounded. We affirm that measures designed to address the needs of the most marginalized have broader systemic benefits for all wxmen.

For more information on EAPN’s stance and recommendations on poverty eradication, consult the position paper [Towards the Eradication of Poverty](#).

Freedom from gender-based violence

Gender-based violence (GBV) encompasses both violence directed towards a person based on their gender, and violence that disproportionately affects persons of a particular gender. **Gender-based violence and poverty are mutually reinforced. Wxmen living in poverty are more exposed to violence, while experiencing GBV often leads to deeper and prolonged poverty.**

For example, unemployment is often cited as a factor in domestic violence:

- The lack of economic, material and social resources can create **dependency** and may discourage them from leaving an abusive situation.
- When unemployment affects the partner who traditionally sees themselves as the primary provider, it can trigger violence against the other partner, especially if that partner is economically independent and socially active, as this **independence** may be perceived as a threat.²

Additionally, domestic violence from an intimate partner is frequently cited as one of the strongest contributors to wxmen’s homelessness. For victims of gender-based violence,

¹ Eurostat. *At risk of poverty or social exclusion in the EU*. Luxembourg: Publications Office of the European Union, 2020.

² EAPN. “EAPN Gender Violence and Poverty.” EAPN. Accessed August 4, 2025. <https://www.eapn.eu/wp-content/uploads/2019/07/EAPN-Gender-violence-and-poverty-Final-web-3696.pdf>.

limited options for affordable and quality housing can trap them in, lead them back to abusive situations or push them to homelessness³.

This exposure to both violence and poverty increases when it pertains to the most marginalized groups such as migrant wxmen, Roma wxmen, single mothers, wxmen living with disabilities, trans wxmen and children. Exposure to GBV in low-income households can perpetuate cycles of trauma and intergenerational poverty. **This cycle is especially detrimental for migrant wxmen who are linked to their spouses through family grouping residence permits.**

For **trans and non-binary people** violence is often fueled by systemic exclusion and stigmatization, disinformation and smear campaigns that deliberately target their identities⁴. These campaigns contribute to widespread stigma and discrimination, which translate into real-world harm, including neglect and mistreatment in healthcare⁵, rejection by family and community, bullying at school, and harassment or exclusion in the workplace⁶. This systemic marginalization leads to loss of income, severe material hardship, and even homelessness. Access to justice is often limited due to **re-victimization and the high financial and emotional cost of legal processes**. Trans and non-binary undocumented migrants face additional legal and administrative barriers, making them especially vulnerable to violence and exploitation. **Many are pushed into undeclared and unsafe work, where they are at greater risk of abuse, unpaid labour, and have no access to protection mechanisms.**

Recommendation:

- **Mainstream socio-economic rights and an anti-poverty perspective** in the post-2025 Gender Equality Strategy, ensuring strong synergies with the European Union Anti-Poverty Strategy to address the root causes and consequences of GBV and poverty together.
- **Strengthen the European Semester** process by introducing more robust and gender-responsive recommendations within Country-Specific Recommendations (CSR), beyond the currently limited indicators in the Social Scoreboard, to better capture gender inequalities and address the structural links between poverty and GBV.
- **Ensure effective implementation** of Directive 2024/1385 on combating violence against women and domestic violence, guaranteeing that wxmen experiencing poverty

³ FEANTSA. “FEANTSA background paper: Women’s Homelessness and GBV.” FEANTSA. Accessed August 4, 2025.

https://www.feantsa.org/public/user/Resources/Position_papers/FEANTSA_background_paper_Women's_Homelessness_and_GBV.pdf.

⁴ United Nations Independent Expert on SOGI. *Report on the impact of hate speech and disinformation targeting LGBTQ+ people*. Geneva: UN Human Rights Council, 2021. <https://docs.un.org/en/A/HRC/47/27>.

⁵ European Union Agency for Fundamental Rights (FRA). *EU LGBTI II Survey*. Luxembourg: Publications Office of the European Union, 2020. <https://fra.europa.eu/en/publication/2020/eu-lgbti-survey-results>.

⁶ ILGA-Europe. *Annual Review*. Brussels: ILGA-Europe, 2024. <https://www.ilga-europe.org/report/annual-review-2024/>.

have adequate and unconditional access to shelters, survivor support services, legal aid, and social welfare, regardless of their residence or migration status.

- **Establish dedicated economic support schemes** for survivors of GBV, including immediate emergency financial assistance during acute crises, medium-term recovery support, and child-focused benefits for orphaned children affected by domestic violence.
- **Introduce and enforce economic penalties** on Member States that fail to adopt, implement, or comply with national legislation addressing gender-based violence, including conditioning access to EU Structural Funds on meaningful action to combat GBV.
- **Provide sustainable funding and support** to civil society organizations and grassroots women's organizations, which play a critical role in preventing GBV, supporting survivors, and promoting socio-economic empowerment.

Equal pay, equal pensions and economic emancipation

Wxmen continue to face underrepresentation in the labour market. In 2021, 67.7% of women were employed compared to 78.5% of men⁷. The growing normalization of precarious, low-paid, and non-standard forms of work disproportionately affects wxmen. **Although minimum wage policies are formally gender-neutral, wxmen are more likely than men to be minimum wage earners, with indirect impacts on their working hours and long-term employment prospects⁸.** Even in stable jobs, wxmen are more likely to experience in-work poverty and struggle to secure a liveable wage.

Certain sectors expose wxmen to heightened vulnerability. For example, wxmen working on digital labour platforms in the EU, many of whom are migrant or undocumented wxmen, are at particular risk of poverty due to the intersection of platform-specific risks, gender inequalities, and insufficient social protections. These workers are more likely to be hired for lower-paid tasks or classified as self-employed, which denies them access to fundamental labour rights and social protection schemes such as minimum wage guarantees, sick pay, paid leave, or unemployment benefits⁹.

This unequal access to quality jobs and decent wages has a direct impact on wxmen's ability to provide for their households. The risk of poverty for households led by women is about one-third

⁷ European Commission. "Gender statistics." Eurostat. Accessed August 4, 2025. https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Gender_statistics.

⁸ Eurofound. *Minimum Wages 2024: Annual Review*. Luxembourg: Publications Office of the European Union, 2024. <https://www.eurofound.europa.eu/en/publications/2024/minimum-wages-2024-annual-review>.

⁹ European Parliament. *Report on the Proposal for a Directive of the European Parliament and of the Council on Improving Working Conditions in Platform Work*. Report no. A9-0301/2022. Brussels: European Parliament, 2022. https://www.europarl.europa.eu/doceo/document/A-9-2022-0301_EN.html.

higher than for other households¹⁰. **Lone mothers face challenges like those of large families (with three or more children), and in some contexts their situation is even more precarious.**¹¹ Across Europe, 34% of lone mothers of working age are at risk of poverty, compared to 17% of other families with children¹². Mothers living with partners participate more actively in the labour force than lone mothers, which may partly explain widening socioeconomic gaps. Shared caregiving responsibilities and combined household incomes benefit partnered mothers, whereas lone parents often struggle to secure even a single stable source of income. Beyond gender roles and the disproportionate burden of care placed on women, the primary obstacle preventing many mothers from engaging in full-time employment is the lack of accessible, affordable, and high-quality public early childhood education, a direct consequence of **systemic failure to invest in and provide adequate public services that support caregiving responsibilities.**

Discrimination also continues to restrict access to stable employment, particularly for racialized women, women with disabilities, and trans women. A 2024 report from the European Disability Forum (EDF) notes a persistent 24-percentage-point employment gap between people with and without disabilities in the EU, with an even greater gap for women and young people with disabilities. Only 51% of persons with disabilities are employed, compared to 75% of those without, with women in this group facing the most significant disadvantages¹³. Similarly, a 2022 European Parliament report on racial justice highlights how **Romani women, racialized women, and migrant women, including those with disabilities, experience intersecting forms of discrimination that limit their access to employment, education, and social protection**¹⁴.

This discrimination is especially severe for women wearing headscarves, who face both **direct discrimination** (being treated less favourably because of religion or belief) and **indirect discrimination** (apparently neutral rules that disproportionately disadvantage certain religious groups)¹⁵.

¹⁰ Nieuwenhuis, Rense. *The situation of single parents in the EU*. Brussels: European Parliament, Policy Department for Citizens' Rights and Constitutional Affairs, 2020.

[https://www.europarl.europa.eu/RegData/etudes/STUD/2020/659870/IPOL_STU\(2020\)659870_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2020/659870/IPOL_STU(2020)659870_EN.pdf).

¹¹ *ibid*

¹² European Institute for Gender Equality (EIGE). "Financial independence and gender equality." EIGE. Accessed August 4, 2025. <https://eige.europa.eu/sites/default/files/documents/financial-independence-and-gender-equality.pdf>.

¹³ European Disability Forum (EDF). *Human Rights Report 2023: The Right to Work*. Brussels: European Disability Forum, 2023. <https://www.edf-feph.org/publications/human-rights-report-2023-the-right-to-work/>.

¹⁴ European Parliament. "A-9-2022-0254." European Parliament, September 20, 2022. https://www.europarl.europa.eu/doceo/document/A-9-2022-0254_EN.html.

¹⁵ ENAR. "Q&A: Headscarf ban." ENAR. Accessed August 4, 2025. https://enar-eu.org/wp-content/uploads/qa_headscarf_ban.pdf.

Regarding pension equality, the 2024 EU Pension Adequacy Report reveals that poverty among older people is rising again, with 20.2% at risk in 2022¹⁶. Notably, **the gender pension gap has widened: in 2019, women over 65 received pensions 29% lower than men**¹⁷, and the gap between men and women's poverty risk rose to 5.6 percentage points in 2022¹⁸. This stems from gender-segregated labour markets (positions traditionally occupied by women tend to be undervalued), lower pay, and disproportionate unpaid domestic and care work performed by women.

Recommendation:

- **Ensure the swift, full, and gender-responsive implementation of the 2023/970 Pay Transparency Directive** by all Member States, including integrating new indicators on gender pay gaps, minimum wage adequacy, and in-work poverty within the Gender Equality Strategy post-2025 to make progress measurable.
- **End in-work poverty for all**, with targeted measures to address the specific barriers faced by women. This should include ensuring fair and living wages, indexed to inflation, and collective bargaining coverage. The directive on adequate minimum wage, setting at least 60% of the median wages, must be transposed and implemented. **Maintain closing the gender pension gap as a central priority** within the Gender Equality Strategy post-2025, strengthening synergies with the European Anti-Poverty Strategy, and ensuring that minimum pension schemes are sufficient to keep older women out of poverty.
- **Closely monitor the implementation of the 2024/2831 EU Platform Workers Directive**, guaranteeing that platform workers are recognized as employees where applicable and enjoy full labour rights, including minimum wage guarantees, paid leave, social protection, and pension entitlements.
- **Ensure that the Council Recommendation on Adequate Minimum Income is correctly and effectively implemented** at national level by 2030, and that measures to address non-take-up explicitly include outreach and targeted support for women in poverty, who are more likely to face barriers accessing benefits.
- **Invest sustainably in childcare and long-term care services** to reduce the disproportionate unpaid care burden on women and enable their full participation in decent, stable, and well-paid employment.

¹⁶ European Commission. *EU pension adequacy report*. Luxembourg: Publications Office of the European Union, 2024.

¹⁷ Eurostat. *Closing the gender pension gap?*. Luxembourg: Publications Office of the European Union, 2021.

¹⁸ European Commission. *EU pension adequacy report*. Luxembourg: Publications Office of the European Union, 2024.

Work- life balance and care

Women tend to live longer and are more likely to need long-term care (LTC) as they age¹⁹. At the same time, the majority of LTC workers are also women, many of whom are migrants²⁰. In 2021, wages in the care and social services sectors were 21% below the average wage²¹. This is largely due to structural undervaluing of sectors traditionally dominated by women, as well as the prevalence of low work intensity and short-term contracts in LTC²². This creates a **double burden for wxmen**, who are both the primary providers of long-term care, for which they are often poorly compensated, and the primary recipients of care later in life, which can be costly.

Wxmen in the EU also face greater time poverty than men because they spend more hours on unpaid care and household tasks²³. As a result, they have less time for social participation and leisure activities. In 2022, only 29% of working women in the EU took part in sports, cultural, or leisure activities outside the home daily or several times a week, compared to 34% of men²⁴. This gap highlights how insufficient investment in public services such as childcare, long-term care, and flexible working arrangements perpetuates gender-based disparities in time use and wellbeing.

Time poverty limits wxmen's opportunities to engage in long-term, full-time employment, restricting their earning potential and increasing their reliance on low-wage or part-time jobs. **Beyond this, wxmen who perform unpaid care work and are not formally employed are neither acknowledged for their contributions to society nor guaranteed a liveable income. Minimum schemes should be framed as fundamental rights rather than benefits that people must deserve.** While all Member States have some form of minimum income in place, these schemes consistently fall below the poverty threshold²⁵.

¹⁹ United Nations. "Briefing Paper: Long-term care." United Nations, n.d.

https://www.un.org/esa/socdev/ageing/documents/un-ageing_briefing-paper_Long-term-care.pdf.

²⁰ EIGE. "Advancing work-life balance with EU funds: A model for integrated, gender-responsive interventions." EIGE. Accessed August 4, 2025. <https://eige.europa.eu/publications-resources/publications/advancing-work-life-balance-eu-funds-model-integrated-gender-responsive-interventions>.

²¹ Eurofound. *Wages in long-term care and other social services 21% below average*. Luxembourg: Publications Office of the European Union, 2021.

²² *ibid*

²³ EIGE. "Advancing work-life balance with EU funds: A model for integrated, gender-responsive interventions." EIGE. Accessed August 4, 2025. <https://eige.europa.eu/publications-resources/publications/advancing-work-life-balance-eu-funds-model-integrated-gender-responsive-interventions>.

²⁴ EIGE. *Gender Equality Index 2022*. Vilnius: EIGE, 2022.

https://eige.europa.eu/sites/default/files/documents/gender_equality_index_2022_corr.pdf.

²⁵ European Commission. "Minimum income." In *Active Inclusion*. Last modified August 5, 2025. https://employment-social-affairs.ec.europa.eu/policies-and-activities/social-protection-social-inclusion/addressing-poverty-and-supporting-social-inclusion/active-inclusion/minimum-income_en.

This, in turn, endangers wxmen's financial security, reduces their pension contributions and heightens their financial dependence in old age²⁶. These intersecting disadvantages underscore the **urgent need to link gender equality with income security and comprehensive care policy reforms**. Structural power imbalances between genders, classes, and racialized groups determine who carries the burden of unpaid and underpaid care work, and who profits from this system. Addressing time poverty therefore requires a fundamental rethinking of how care is organized, valued, and redistributed across society. It underscores the urgent need to link care justice with economic justice and to challenge the systems that commodify labour while extracting value from the unpaid and invisible work predominantly carried out by wxmen.

Recommendation:

- Integrate **a gender-responsive, lifelong, and intersectional approach to care** within the EU Gender Equality Strategy post-2025, the EU Care Strategy, the EU Anti-Racism Action Plan, and EU frameworks on migration and integration. This should include liveable wages, decent working conditions, minimum quality standards, and adequate guidelines across the life course.
- Call for adequate investment in **high-quality public care and social services**, with specific measures to support both formal and informal carers, including unpaid carers, and to recognise their contributions.
- Maintain and strengthen **synergies with the EU Anti-Poverty Strategy** to address the gendered and intersectional risks of poverty, including in-work poverty and pension poverty, through adequate minimum wages and minimum income, social protection, collective bargaining, and targeted measures to tackle non-take-up of benefits.
- Support **lifelong learning, reskilling, and training opportunities** for wxmen in care roles to increase their social mobility and economic security.
- Ensure national implementation of the **Council Recommendation on minimum income** is gender-responsive and supports the needs of wxmen living in poverty, especially lone mothers, racialised wxmen, migrant wxmen, and wxmen with disabilities.

Addressing the needs of the underrepresented wxmen

In the EU, wxmen experience poverty across their life course, with marginalization often deepening depending on their age. As children, poverty is closely linked to the poverty of their mothers, contributing to nearly **1 in 4 children being at risk of poverty or social exclusion**²⁷. Girls from ethnic minority backgrounds, for example, have far lower participation in leisure or sports activities, which limits their social inclusion and voice in decisions that affect them. In

²⁶ Eurostat. *Closing the gender pension gap?* Luxembourg: Publications Office of the European Union, 2021.

²⁷ Save the Children. *Guaranteeing Children's Future*. Madrid: Save the Children, 2021.
https://www.savethechildren.es/sites/default/files/2021-11/Guaranteeing-Childrens-Future-Informe_SCT.pdf.

youth, young women face higher unemployment rates and greater barriers to accessing decent work than young men, with almost 75 million trained young people unable to find employment and persistent gender pay gaps expected to take centuries to close.²⁸ Education can improve prospects, with each extra year boosting a girl's future wages by up to 20%, yet many remain excluded from quality opportunities²⁹. **In older age, women face disproportionate risks of poverty compared to men, particularly elderly women living alone whose financial security is undermined by lower lifetime earnings and pension entitlements, as well as health challenges**³⁰. Taken together, these patterns show how poverty among women is shaped by age, gender, and structural inequalities, requiring responses that address their intersecting and evolving needs.

In the EU, over **80% of Roma people live below the at-risk-of-poverty threshold, with Roma women particularly disadvantaged due to discrimination and low access to education or decent work**.³¹ Indeed, employment is much rarer for Roma women than men. In 2021, only 28 % of Roma women aged 20–64 were in employment, in comparison with 58 % of Roma men in the same age category³². Beyond this, only one in two Roma children attends kindergarten and only 15% complete secondary school³³. Roma and ethnic minority girls achieve a lower educational level than most girls and boys from the same community³⁴. Unequal access to quality education is one of the main factors behind the social exclusion and poverty facing Roma women and their children as it has repercussions on employment status and quality of work, on housing conditions, and on access to healthcare. Poor socioeconomic conditions compounded with discriminations against Roma people also increase the health risks for Roma women, reducing their life expectancy. On average, Roma women live for 71.3 years, while the average is 82.2 years for women in the general population³⁵.

Migrant women have higher poverty and exclusion rates than both native-born women and migrant men, due to barriers in accessing employment, recognition of qualifications, and

²⁸ European Parliament. *Report on Reducing Inequalities and Promoting Social Inclusion in Times of Crisis for Children and Their Families*. Report no. A9-0360/2023. Brussels: European Parliament, 2023. https://www.europarl.europa.eu/doceo/document/A-9-2023-0360_EN.html.

²⁹ UN Women and United Nations Department of Economic and Social Affairs. *Progress on the Sustainable Development Goals: The Gender Snapshot 2022*. New York: United Nations, 2022. https://www.unwomen.org/sites/default/files/2022-09/Progress-on-the-sustainable-development-goals-the-gender-snapshot-2022-en_0.pdf.

³⁰ European Institute for Gender Equality. *Financial Independence and Gender Equality: Joining the dots between income, wealth, and power*. Vilnius: European Institute for Gender Equality, 2024. <https://eige.europa.eu/sites/default/files/documents/financial-independence-and-gender-equality.pdf>.

³¹ FRA. "80% of Roma live in poverty." FRA, July 18, 2022. <https://fra.europa.eu/en/news/2022/80-roma-live-poverty>.

³² FRA. *Roma Survey 2021: Main Results*. Luxembourg: Publications Office of the European Union, 2022. https://fra.europa.eu/sites/default/files/fra_uploads/fra-2022-roma-survey-2021-main-results2_en.pdf.

³³ *ibid*

³⁴ *ibid*

³⁵ FRA. *Roma Survey 2021: Main Results*. Luxembourg: Publications Office of the European Union, 2022. https://fra.europa.eu/sites/default/files/fra_uploads/fra-2022-roma-survey-2021-main-results2_en.pdf.

childcare³⁶. In 21 out of 22 EU countries with complete and reliable data, non-EU citizens are much more likely to be at risk of poverty or social exclusion than nationals, both for men and women³⁷. Migrant women, including undocumented migrants, refugees and asylum seekers experience multiple forms of discrimination in securing formal employment as well as securing temporary or permanent housing. This occurs when residence permits are employer-specific, making workers more vulnerable to exploitation and underpayment by ill-intentioned employers³⁸. Furthermore, the enforcement of laws including deportation or permit restrictions which specifically target migrant and undocumented women only heighten the risk of poverty and social exclusion³⁹.

Women with disabilities constitute close to 26% of the total population of women in the EU⁴⁰. Despite this large population of 60 million, women and girls with disabilities continue to face multiple and intersectional discrimination in all areas of life, including socio-economic disadvantages, low rates of employment, and high rates of poverty⁴¹. On average, 29.5 % of women with disabilities are at risk of falling victim to poverty and social exclusion, and only 20.7 % of women with disabilities are in full-time employment⁴². 22% of women with disabilities in the EU⁴³ face severe material deprivation, compared to 15% of men without disabilities, and they are often excluded from both mainstream and platform-based jobs due to accessibility gaps and discrimination. In some Member States, people with disabilities often lose their disability entitlements upon taking up employment, which increases their risk of in-work poverty. This situation is due to a combination of factors, including but not limited to stigma and discrimination based on both their gender and disability, the lack of safe avenues to report situations of harassment in the workplace and the prevalence of unpaid and informal work⁴⁴. Even in employment, women with disabilities earn less than their male counterparts and less than

³⁶ Eurostat. “Migrant integration statistics - at risk of poverty and social exclusion.” Eurostat. Accessed August 4, 2025. https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Migrant_integration_statistics_-_at_risk_of_poverty_and_social_exclusion.

³⁷ *ibid*

³⁸ PICUM. *FAQ: Regularisation of Undocumented Migrants*. PICUM. Accessed August 4, 2025. <https://picum.org/wp-content/uploads/2023/08/FAQ-Regularisation-EN-2.pdf>.

³⁹ OHCHR. *A/HRC/56/61/Add.3*. Report of the Special Rapporteur on adequate housing. Geneva: United Nations, 2024. https://www.ohchr.org/sites/default/files/2024-11/a-hrc-56-61-add3-eng_0.pdf.

⁴⁰ European Union. “EU-SILC UDB release 1, 2021.” Data available in European comparative data on Europe 2020 and persons with disabilities. Accessed December 2021.

⁴¹ *ibid*

⁴² European Disability Forum (EDF). “2023 EU Gender Equality Index: Women with disabilities still left behind.” EDF, October 24, 2023. <https://www.edf-feph.org/2023-eu-gender-equality-index-women-with-disabilities-still-left-behind/#:~:text=22%25%20of%20women%20with%20disabilities,15%25%20of%20men%20without%20disabilities>.

⁴³ *ibid*

⁴⁴ UN Women. *Sexual harassment against women with disabilities in the world of work and on campus*. New York: UN Women, 2020.

women without disabilities, thus leading them to have lower financial resources and to be more likely to experience in-work poverty⁴⁵.

Within the LGBTQI+ community in the EU, **trans people remain among the most marginalized with only 51 % of them in paid employment, compared with 69.3 % of the general population**⁴⁶; whereas unemployment is a particular issue for trans women, who are nearly three times as likely to be unemployed as the general population average⁴⁷. This is particularly due to hostile and discriminatory work environments fuelled by transphobic beliefs and attitudes. 1 in 3 trans people experience discrimination when searching for employment and this number increases to 1 in 2 trans women⁴⁸. Lack of access of the labour market and transphobia contribute to further drive trans women to social exclusion with 26 % of trans women in the EU reporting that they have experienced homelessness at some time in their lives and 25 % say they can make ends meet only with difficulty or great difficulty⁴⁹.

Recommendations:

- **Integrate anti-poverty and social exclusion perspectives in the new Gender Equality Strategy post-2025**, converging with the EU Roma Framework, LGBTIQ Equality Strategy, Disability Rights Strategy, the Roma Strategic Framework 2021-2030 and Anti-Racism Action Plan.
- Promote **convergence with the Child Guarantee, Homelessness Platform, and the EU Care Strategy** to secure accessible childcare, healthcare, housing, and long-term care for the most disadvantaged women and girls.
- Prioritize the **collection and reporting of disaggregated data** (sex, disability, migration and residence status, gender identity) through Eurostat and Member State statistical systems.
- **Align MFF post-2027 to reach most marginalized women** and ensure ESF+, ERDF, AMIF and other EU funds prioritize actions for Roma women, migrant women, women with disabilities, trans women, and homeless women.
- Integrate within the European Semester structural barriers for marginalized women in accessing decent work, livable wages, and social security.
- Establish **structured dialogue and participatory mechanisms** with women from underrepresented groups in all phases of policy design, monitoring and evaluation.
- Set **disaggregated target to reduce poverty among the most marginalized women**, in line with the European Pillar of Social Rights and SDG targets, and track progress with intersectional indicators.

⁴⁵ European Institute for Gender Equality (EIGE). *Gender Equality Index*. Vilnius: EIGE, 2021.

⁴⁶ European Commission. *Legal gender recognition in the EU – The journeys of trans people towards full equality*. Luxembourg: Publications Office of the European Union, 2020.

⁴⁷ *ibid*

⁴⁸ *ibid*

⁴⁹ European Commission. *Legal gender recognition in the EU – The journeys of trans people towards full equality*. Luxembourg: Publications Office of the European Union, 2020.

Homelessness

Wxmen experiencing homelessness, often invisible in statistics, face gendered pathways into homelessness, including domestic abuse and inadequate social protection support. They are largely excluded from digital and formal labour markets⁵⁰. **Wxmen's pathways into, and experiences of, homelessness differ significantly from those of men.** Standard definitions of homelessness often fail to capture the realities faced by many wxmen, as they are less likely to sleep rough and more likely to rely on informal or temporary accommodation arrangements. Factors such as the risk of gender-based violence, or fear of losing custody of their children to state care, can drive wxmen to seek alternatives to the street, for example, sofa-surfing or staying temporarily with friends or family⁵¹.

Women who have experienced domestic violence are up to four times more likely to face housing instability than women who have not⁵². For many, homelessness is an inevitable consequence of fleeing domestic violence, reflecting the lack of accessible, affordable, and secure housing options.

Additionally, persistent gender pay gaps place wxmen at greater risk of housing insecurity and homelessness, particularly as housing costs rise. For survivors of gender-based violence, a lack of affordable, quality housing can force them to remain in, or return to, abusive situations. Addressing wxmen's homelessness therefore requires a gender-responsive, intersectional approach that recognizes these overlapping challenges and promotes both housing and economic security⁵³.

It is essential to recognize that **wxmen experiencing homelessness are not a homogenous group**. Support services must be responsive to the needs of diverse groups of wxmen, including those with children, young wxmen, older wxmen, wxmen engaged in survival sex, LGBTIQ wxmen, migrant wxmen, minority and Roma wxmen, and wxmen living with disabilities. Many wxmen belong to more than one of these groups and face multiple, intersecting forms of structural discrimination that compound their vulnerability.

Recommendations:

- Ensure that EU frameworks and data collection tools (e.g. Eurostat, national statistical offices) **expand definitions beyond street homelessness to capture hidden homelessness and informal arrangements** disproportionately affecting wxmen.

⁵⁰ FEANTSA. "Women's Homelessness: European Evidence Review." FEANTSA, April 1, 2021. <https://www.feantsa.org/en/report/2021/04/01/womens-homelessness-european-evidence-review>.

⁵¹ ibid

⁵² Women Rough Sleepers. "Home." Women Rough Sleepers. Accessed August 4, 2025. <http://womenroughsleepers.eu/>.

⁵³ FEANTSA. "Guide: Supporting and solutions for women." FEANTSA. Accessed August 4, 2025. <https://www.feantsa.org/public/user/Resources/resources/Guide%20supporting%20and%20solutions%20for%20women.pdf>.

- **Mainstream homelessness and anti-poverty perspectives in the EU Gender Equality Strategy.**
- Encourage Member States to **embed gender-responsive Housing First models in national homelessness strategies**, prioritizing wxmen fleeing gender-based violence, in line with the EU Platform on Combatting Homelessness.
- **Mobilize EU funds in MFF post-2027** (ESF+, ERDF, InvestEU) to combat severe material deprivation and support affordable housing specifically for wxmen experiencing homelessness, including survivors of domestic violence, as a convergence measure with the European Care Strategy and the Child Guarantee.
- Support Member States in developing integrated, gender-sensitive homelessness services (social, psychological, legal, employment support) designed with and for diverse groups of wxmen, including Roma, migrant, LGBTIQ+, and wxmen with disabilities.
- Promote mechanisms to **include wxmen with lived experience of homelessness** in the design, delivery, and evaluation of policies and services at EU and national level.

The criminalization of poverty

People living in poverty are disproportionately affected by criminal law and policies, which in turn contribute to maintaining them trapped in a social exclusion cycle. Wxmen and girls, particularly Roma wxmen and girls and racialized wxmen are all too familiar with this phenomenon, as they are overly impacted by incarcerations for crimes related to poverty including the discriminatory application of public order offences such as loitering, vagrancy, public nuisance and public indecency or prohibitions of sex work⁵⁴.

As pointed by FEANTSA⁵⁵ this is especially true regarding anti-homeless measures: “*The social and economic policies of the last few decades have encouraged increasing hostility towards people who are homeless, in particular when it comes to their presence in public spaces, and efforts tend to aim at making them invisible rather than meeting their social needs*”. Experiences of gender-based violence are often interlinked with homelessness or being subjected to detention for performing life-sustaining activities in the street: as such the criminalization of wxmen in poverty and homeless wxmen perpetrates cycles of violence and further contributes to

⁵⁴ Special Rapporteur on Extreme Poverty and Human Rights and Special Rapporteur on Adequate Housing. *Breaking the Cycle: Ending the Criminalization of Homelessness and Poverty*. Report no. A/HRC/56/61/Add.3. Geneva: United Nations Human Rights Council, 2024. https://www.ohchr.org/sites/default/files/2024-11/a-hrc-56-61-add3-eng_0.pdf.

⁵⁵ FEANTSA. “Homeless in Europe Magazine: Criminalisation of homelessness.” FEANTSA, 2020. https://www.feantsa.org/public/user/Resources/magazine/2020/Homeless_in_Europe_Magazine_Spring_2020_Criminalisation_of_homelessness.pdf.

their social exclusion⁵⁶. More broadly, poverty is also a major obstacle to accessing justice and legal aid⁵⁷, leading to the over-representation of wxmen from marginalized groups in prisons.

Recommendations:

- Demand the **repeal of all laws and administrative provisions that criminalize survival activities** in public spaces including laws targeting begging, sleeping rough, informal economic activities, sex work, and other forms of subsistence work.
- Advocate for the **abolition of discriminatory public order offences** such as loitering, vagrancy, “public nuisance,” or “indecentcy that target people in poverty, especially wxmen, racialized communities, Roma, and migrant and undocumented wxmen.
- Allocate **dedicated budget lines in the MFF post-2027 and demand the development of gender-responsive community-based alternatives** to prisons as well as restorative justice programs.
- Develop the collection of **disaggregated qualitative and quantitative data** at the EU level on the various aspects of the criminalization of poverty and the barriers to justice by marginalized communities.
- **Reform the Directive (EU) 2016/1919 on legal aid for suspects and accused persons in criminal proceedings** and for requested persons in European arrest warrant proceedings to include the right to free legal aid for all suspects and accused persons in the EU, regardless of residence status.

Policy Coherence Across EU Strategies

Poverty cannot be effectively tackled in isolation. It is **rooted in structural inequalities, including gender inequality, racial and ethnic discrimination, disability-based exclusion, ageism, and discrimination based on sexual orientation or gender identity**. Wxmen, especially those experiencing intersecting forms of discrimination, face higher rates of poverty due to systemic barriers in access to decent work, affordable housing, adequate social protection, and essential services.

Climate change and the energy crisis further exacerbate these inequalities. Wxmen are overrepresented among those in energy poverty, more dependent on natural resources, and have fewer assets or resources to adapt to the impacts of climate change. Yet, **EU climate and energy policies have too often failed to integrate a gender perspective and may even further drive them to social exclusion**⁵⁸. An intersectional, gender-responsive approach is therefore essential

⁵⁶ *ibid*

⁵⁷ Fair Trials. “Access to legal aid.” Fair Trials. Accessed August 4, 2025.
<https://www.fairtrials.org/articles/film-video/access-to-legal-aid/>.

⁵⁸ CEPS. “The gender-blind assumptions of the EU’s green transition require a reality check.” CEPS, March 2, 2023. <https://www.ceps.eu/the-gender-blind-assumptions-of-the-eus-green-transition-require-a-reality-check/?utm>.

across all EU frameworks to ensure that no one is left behind in the green and digital transitions, and to guarantee fair, rights-based and inclusive outcomes.

Additionally, integrating gender and anti-poverty perspectives in the just transition is important to address pre-existing gender and social inequalities, and to ensure that policies for the just transition actively improve people's well-being. **If considered at all, social impacts are often seen as a byproduct of climate policy.** "Green" energy systems are not automatically fairer than previous systems. In this perspective, the exclusion of FLINTA from policy and decision-making jeopardizes unique opportunities to integrate wxmen and marginalized groups' perspectives into Just Transition decision-making. While only 35% of elected members in municipal counties in the EU are women⁵⁹, this lack of representation means that policies including those addressing climate and environmental challenges remain discriminatory or gender blind at best.

Similarly, wxmen are disproportionately affected by negative effects of digitalization, particularly as it pertains to the automation of poverty. EAPN defines digital poverty as the inability to interact adequately with digital devices and spaces, due to a lack of skills, resources (such as electricity, smartphones, and laptops), or internet access. Wxmen are particularly affected by digital poverty due to their unequal access to the job market, to liveable wages and income and later in life to liveable pensions. Although digitalization aims to facilitate access to services, it has inadvertently deepened the challenges faced by those already at risk of poverty. Instead of removing barriers, it has added new ones, making it harder for individuals to access essential information and services, social benefits, and employment opportunities. This is a determining factor regarding wxmen's non-take up of social benefits.

What is non-take-up?

Non-take-up refers to situations **where individuals or households who are eligible for social benefits or support services do not access** them due to various barriers such as administrative burden, complicated procedures, digitalization, lack of information, or stigmatization.

It must be noted that no Member State compensates people retroactively for the non-take-up of benefits and at least 10% of applications are rejected, highlighting the challenge of inefficiencies and ineffectiveness⁶⁰. Marginalized wxmen are the most at risk as groups facing gaps in minimum income benefit include households with low incomes or assets, groups of non-nationals (third-country nationals with temporary resident permits, EU citizens looking for work) and homeless people.

The extent of non-take-up remains largely unknown at the EU level. Addressing this issue requires a coordinated set of actions at both EU and national levels, such as awareness-raising, building trust in institutions, addressing economic incentives, building a rights-based

⁵⁹ European Institute for Gender Equality (EIGE). *Gender statistics database*. Vilnius: EIGE, 2020.

⁶⁰ Eurofound. *Social protection 2.0: Unemployment and minimum income benefits*. Dublin: Eurofound, 2024.

approach to MIS, and partnering with civil society organizations and people experiencing poverty⁶¹.

Policy coherence on gender and the eradication of poverty must go beyond the EU level and be fully mainstreamed at national and local level. While the EU is currently working on its first Anti-poverty Strategy and renewing its Gender Equality Strategy, there is currently no requirement for EU Member States to adopt **National Anti-Poverty Strategies** (NAPS) and **Local Anti-Poverty Strategies** (LAPS), nor are there minimum standards for their design process and content. The EU Anti-Poverty Strategy and the renewed Gender Equality Strategy present opportunities to support the development, strengthening, and implementation of national gender transformative antipoverty strategies, complementing and reinforcing EU-level action towards poverty eradication and gender equality.

A coherent, cross-cutting anti-poverty approach must be mainstreamed and systematically coordinated across all EU equality, inclusion, and social frameworks. This is vital to address root causes, avoid fragmented and siloed policies, and deliver meaningful structural change for women and all those most at risk.

Recommendations:

- **Exempt social and green investments from the 3% deficit-to-GDP ratio outlined by the Stability and Growth Pact and the Excessive Deficit Procedure**, with no exceptions.
- Ensure **adequate funding to address climate poverty, with a focus on energy efficiency and housing renovation in the MFF post-2027**, to ensure that people living in poverty receive adequate support during the green transition.
- Ensure the EU Anti-Poverty Strategy is aligned with, and coordinated across, the post-2025 Gender Equality Strategy, the EU LGBTIQ+ Strategy, the EU Anti-Racism Action Plan, the EU Disability Strategy, the EU Affordable Housing Initiative, National Energy and Climate Plans, and other relevant frameworks.
- Include dedicated sections on poverty and anti-poverty measures in **national social climate plans formulated by EU member states**.
- Integrate anti-poverty approaches into the EU Migration Pact and the EU Action Plan on Integration and Inclusion, with a specific focus on addressing the structural drivers of poverty among migrant and refugee women.
- Strengthen **alignment with the EU Roma Strategic Framework 2021–2030** to meet clear anti-poverty objectives and targets, with intersectional gender analysis.
- **Review and expand the European Pillar of Social Rights Social Scoreboard to include gender-disaggregated and intersectional data on poverty and social exclusion.**

⁶¹ European Anti-Poverty Network. *Position Paper “Towards the Eradication of Poverty”*. Brussels: European Anti-Poverty Network, 2025. https://www.eapn.eu/wp-content/uploads/2025/04/eapn-POSITION_PAPER_TOWARDS_ERADICATION_POVERTY_EAPN-6139.pdf.

- **Transform the EU Semester into an EU Social Semester**, ensuring that Country Specific Recommendations include targeted and adequately resourced social protection measures for women who are living in or at risk of poverty.
- **Ensure offline access to essential services.** As more services move online, the EU APS and the Gender Equality Strategy must ensure they are accompanied by physical, accessible, affordable, and quality in-person essential services, along with easy-to-navigate assistance.
- Expand access to **affordable internet coverage** by securing financial support in the MFF post-2027 to extend high-speed internet coverage, especially in remote and rural areas.
- Ensuring that the Just Transition Fund (JTF) integrates a gender perspective is accessible to people living in poverty, without regional disparities, to support the reskilling and training of low-income women affected by the green transition. The JTF should also be revised to include targets and commitments aimed at addressing gender inequality and climate-related poverty.

Data, Monitoring, and Accountability

Despite their disproportionate exposure to poverty, women and girls often remain invisible in data, policy, and poverty reduction measures. Traditional indicators fail to capture multidimensional and intersectional drivers of FLINTA's poverty, such as gender-based violence, care-related poverty traps, or insecure housing. Strengthening the evidence base and accountability structures is therefore essential to ensure EU and national policies deliver on eradicating poverty for all, leaving no one behind.

Recommendations:

- Mandate EIGE and FRA to conduct regular, **EU-wide research and reporting on the intersectional dimensions of poverty**, with disaggregated data by gender, migration status, disability, age, sexual orientation and sexual identity.
- Include EIGE's **Gender Equality Index** as a core component of the EU Social Scoreboard to strengthen the gender dimension of EU social policy coordination.
- Develop an **EU-level accountability framework** to monitor Member States' compliance with gender-responsive and intersectional anti-poverty measures, with meaningful civil society participation.
- Call for the adoption of a new **horizontal Equal Treatment Directive** that explicitly covers social protection, housing, and poverty-related discrimination, to close legislative gaps and reinforce accountability for addressing intersectional inequalities.