



# Social Rights Monitor 2025 - Country Report - Portugal

# **Contents**

- 1. About SOLIDAR
- 2. What is the Social Rights Monitor (SRM)?
- 3. What is the process?
- 4. How do we use it?
- 5. Social Rights Monitor Overview
- 6. Equal Opportunities and Access to the Labour Market
- 7. Fair Working Conditions
- 8. Social Inclusion and Protection
- 9. Civic Space
- 10. Just Transition

#### **About SOLIDAR**

SOLIDAR is a European network of progressive Civil Society Organisations (CSOs) working to advance social justice through a just transition in Europe and worldwide. We represent over 50 member organisations based in 26 countries (19 of which are EU countries), among which national CSOs in Europe, as well as some non-EU and EU-wide organisations, working in one or more of our fields of activity.

The network is brought together by its shared values of solidarity, equality and participation.

SOLIDAR voices the concerns of its member organisations to the EU and international institutions by carrying out advocacy actions, project management and coordination, policy monitoring and awareness-raising across its different policy areas.

# What is the Social Rights Monitor (SRM)?

The Social Rights Monitor assesses the implementation of the European Pillar of Social Rights (EPSR) at national level from a civil society perspective. The EPSR – also known as the Social Pillar – is a set of 20 principles that guide the action of the European Union in the realm of social affairs and policies. In other words, it is intended to be a compass guiding the EU towards a more social Europe. For too many people, however, the implementation of these principles at national and EU level is not yet a reality.

Thanks to the contribution of our members and their networks on the ground (the National Strategy Groups), SOLIDAR monitors the extent to which social rights are respected, upheld and promoted for all people living in the EU. The Social Rights Monitor also investigates the health of civic space and social and civil dialogue in the EU, as well as the extent to which a just transition is being pursued. Therefore, the thematic areas covered by the Monitor are the following: Equal opportunities and access to the labour market; Fair working conditions; Social inclusion and protection; a Just transition; and Civic space. The first three correspond to the three chapters of the EPSR, while the last two have been added to give a fuller picture of social justice in Europe.

Thanks to first-hand data gathered by national civil society organisations, the Social Rights Monitor constitutes a direct channel of policy recommendations between the national level and EU policymakers. It thus amplifies the voices and needs of the most marginalised groups. The Monitor dedicates a section to "advocacy messages" which result from the national-level analyses in each thematic area and are addressed to EU policymakers.

Countries are assigned a score for each thematic area out of a maximum of 100 points. This makes immediately visible how each country is performing in each area and enables comparison with other countries. The numerical scores originate from the National Strategy Groups' (NSGs) assessments of national developments related to social rights, civic space and just transition. Negative developments in an area result in lower scores. NSGs rate these developments for each country by replying to Linkert-scale questions. This means that the score of a country's thematic area is given by adding up all the rates given to the questions concerning that thematic area and expressing the score out of 100. The overall score of a country is the average of the thematic areas scores. Further details on the questionnaire and data gathering are provided in the section "About: What is the process?"

Since the SRM score reflects the NSG's assessment of changes—either improvements or deteriorations—in each of the five areas over the past 12 months, it does not represent the overall status of these dimensions in absolute terms. Instead, it highlights recent trends. For example, a country with a historically strong welfare state might receive a low score if recent reforms have significantly weakened social rights or pose a risk of doing so. This does not imply that the overall situation is poor, but rather that recent developments are cause for concern and may undermine social standards over time.

Therefore, the SRM should not be used to compare the overall situation of social rights across countries—official statistics are more appropriate for that purpose. Instead, it serves as a tool to track short-term national trends and to understand the perspectives of civil society organizations (CSOs) on these developments.

# What is the process?

The Social Rights Monitor is a tool that amplifies the voice of progressive civil society at national level. Its content is based on the inputs provided by the National Strategy Groups (NSGs) set up by SOLIDAR's members and partners, which are active in the countries analysed. They consist of NGOs, associations, movements, trade unions, academia and thinktanks, ensuring that the perspective of civil society is mirrored in the Social Rights Monitor's analysis. The Monitor reflects the experiences of these organisations, which are active on the ground, and the experiences are complemented by scientific data gathered through desk research.

The data elaborated in the Social Rights Monitor are gathered by SOLIDAR's secretariat through a questionnaire distributed to the National Strategy Group Leaders (our national members) and completed with information produced by each group. From 2023, this questionnaire has been carried out online.

Based on the picture that emerges from the Monitor, SOLIDAR and the NSGs together devise policy recommendations for EU policymakers. These aim to make social rights, a healthy planet and an enabling, free, protected civic space are a reality for all in Europe. The key recommendations stemming from the analysis are used as a basis for SOLIDAR's social affairs advocacy work.

The SRM is published every year, around the end of November/beginning of December and its findings cover the period going from June of the previous year to May of the year of the publication. This timeline is due to the fact that the NSGs submit their questionnaire by the end of May of the publication year.

# How do we use it?

SOLIDAR's main role as a European-level civil society network is as a bridge between EU institutions and their policies on the one hand and our progressive members working at the national level on the other. The Social Rights Monitor is a valuable tool to gather information from the ground and bring it to policymakers' attention. This ensures that the voices of the most neglected social groups are duly taken into account. For example, the SRM complements the European Semester, by providing a more-complete assessment of Member State policies. Regrettably, the Semester is still too focused on countries' economic and financial performances and does not provide sufficient guidance on upward social convergence in the European Union.

SOLIDAR disseminates the findings of the Social Rights Monitor in various ways, including through the Social Europe Conference, an annual event at which it is presented, and which also explores a topic of priority for social Europe. More generally, the Monitor is one of the main ways through which the SOLIDAR network presents its positions on social affairs, so its findings are mainstreamed throughout our advocacy work.

# **Social Rights Monitor Overview**

### SCORE: 20

Portugal has been regressing in several social areas. Gender equality remains a major challenge, as there are sizeable and persistent gender gaps in pay and in job roles. The minimum wage has not kept pace with increases in the cost of living. Temporary employment is widespread and is the predominant form of precarious employment. Housing is a challenge for many people, and its high cost makes other necessities – for example, mobility – very difficult to afford. Migrants face several forms of discrimination, including in access to housing, healthcare and public services. The transition to the new Agency for Integration, Migration, and Asylum has had disastrous consequences for migrants, making it practically impossible for them to regularize their situations. Meaningful contributions by CSOs to address these issues have become rare. The work of many CSOs is threatened by cuts in funding, despite their essential role in providing social services.

The NSG for Portugal was led by SOLIDAR's member Casa do Brasil de Lisboa.



# **Equal Opportunities and Access to the Labour Market**

### SCORE: 17

#### **Gender equality**

No legislative initiatives or other policy measures were introduced that substantially improved gender equality in Portugal over the reporting period, according to the NSG. Moreover, empirical data seem to indicate a multifaceted regression in gender equality. The gender wage gap is persistent and now averages €200 a month, according to the 2024 report from the Comissão para a Igualdade no Trabalho e no Emprego (Commission for Equality in Labour and Employment).[1] Sectors that predominantly employ women, such as healthcare, education, hospitality and other services, have pervasive gender pay gaps. And within these sectors, there is a high degree of occupational segregation: Despite gender parity policies, women are overrepresented in caregiving roles and underrepresented in decision-making and executive roles. In academia, women are far less likely to become professors than men, and they often remain in adjunct teaching roles or temporary positions. In the private sector, too, only 19% of listed companies in Portugal had a female CEO or board chair in 2025.[2]

One important factor is maternity discrimination. Despite legal protection, pregnant women often find themselves demoted or even dismissed shortly after returning to work. The average waiting time for public daycare in Lisbon is nine months because of a lack of facilities. Many families resort either to expensive private alternatives or to family care, which falls disproportionately on women. This is especially the case for migrant women, who face more barriers if they are undocumented or awaiting a residency permit, as a residency permit is needed to access public services. Migrant women thus often have to work in the informal economy, exacerbating their precariousness. Domestic work is one of the sectors in which they are employed the most – and also one of the least regulated, leaving these women vulnerable to exploitation.

Gender-based violence is another form of gender discrimination, as it disproportionately affects women and LGBTQI+ people. More than 30 000 cases of domestic violence were registered in 2024 by the police in Portugal, including 22 fatalities, 19 of which were women.[3] Even though the lifetime rate of intimate partner violence in Portugal is at 22.5%, 9.3 percentage points less than the EU average, the percentage is still highly concerning.[4] The Portuguese Association for Victim Support (APAV) helped 16 630 individuals, of whom 76% were victims of domestic violence.[5] Most affected are socially vulnerable people – such as single mothers, migrants and people without access to housing and legal aid – and trans and queer individuals, who also face secondary victimisation when

trying to seek protection from public institutions. [6] Despite these high numbers, over 62% of cases of domestic violence were closed without any charges being pressed, highlighting a systemic failure and widespread impunity.[7]

In a severe backlash against gender diversity education and sex education, some municipalities are cutting programmes in the name of so-called "ideological neutrality".[8] Reproductive rights, such as abortion, have also come under pressure. Women in rural areas often have to travel hours to reach an abortion clinic, and education on and access to contraception remain limited. One cause of these problems is increasingly misogynistic and hateful language used by far-right politicians.[9][10][11] Another is the structural discrimination experienced by trans and gender-diverse people in Portugal.[12] Many gender-diverse people find themselves excluded from formal employment, education and healthcare. They also suffer verbal abuse.[13] Gender-affirming care and mental health services are either difficult or impossible to access. That leads many gender-diverse people to rely on community-based services, which do not have sufficient capacity or funding to deal with the influx of people.[14]

#### Inclusion of migrants, refugees, asylum seekers and minorities, and quality of work permits

The new Agency for Integration, Migration, and Asylum (AIMA) was introduced as a modernization to make the treatment of migrants more humane. However, the transition from the previous Serviço de Estrangeiros e Fronteiras (Foreigners and Borders Service) and High Commission for Migration led to widespread chaos and a systemic collapse. The platforms where migrants can access the services to apply for and renew residency permits as well as basic information services became unavailable or experienced grave technical issues, and the in-person services of AIMA proved rapidly overwhelmed. As such, many migrants had to navigate through difficult procedures to make these applications, remaining uncertain of their outcome.

The well-established "Manifestação de Interesse" (Expression of Interest) procedure was terminated in June 2024 through Decree-Law no. 37-A/2024.[15] This procedure used to allow migrants already working and residing in Portugal to apply for a residency permit, if they could provide proof of work and social security contributions. and social security contributions. and social security contributions. The decree law provided some exceptions to this termination for persons who had already contributed to the social security system. Nevertheless, many people, who spent several years preparing the necessary documentation for the "Manifestação de Interesse" procedure, were left without permits. No public consultation was held on the termination of the procedure, and the new AIMA system largely sidelined CSOs, which used to be able to participate in consultative processes under the previous system. Moreover, the AIMA system is far less transparent, and its complaint and oversight mechanisms are largely non-functional.

To mitigate the effects of the disastrous AIMA-transition, the government issued Decree-Law no. 41-A/2024, which extended the validity of expired residency titles and visas until the end of June 2025.[16] This, however, proved equally disastrous, with holders of these permits being *de facto* confined to the Portuguese territory, as the extension is not legally valid outside Portugal. This is especially the case for people who came to Portugal under the Community of Portuguese Language Countries (CPLP) mobility agreements.[17] Permits issued under these agreements are not valid in other EU Member States. That means permit holders cannot seek work in EU countries apart from Portugal, impeding family reunification.[18] To initiate the reunification procedure, AIMA requires applicants to have a valid residence card. It has been often impossible to obtain or renew a residence card due to the administrative confusion at AIMA.[19] Moreover, the government has substantially increased the surveillance of informal employment, the NSG points out. It carries out mass identity checks, ordering police interventions in workplaces, and increasing expulsions.[20]

In response to these systemic failures, migrant workers staged protests in 2025. The "Documentos para Todos" (Documents for all) protest, organized by grassroots movements such as Solidariedade Imigrante and Casa do Brasil de Lisboa in April 2025, denounced both AIMA's failure and the government's discriminatory migration policies.[21] Similar protests were carried out all over Portugal to highlight migrant workers' plight.[22] While it is highly important to address these systemic failures, the NSG points out that the quality of work for third-country nationals (TCNs) needs to improve too. TCNs in Portugal are disproportionately subject to abuse, underpayment and occupational risks, the European Labour Authority's 2024 report on posted workers shows.[23] They are highly vulnerable to exploitative labour conditions, especially in sectors such as agriculture and construction.



# **Fair Working Conditions**

#### SCORE: 14

#### **Adequate wages**

Wages in Portugal have increased moderately – but they have not kept up with the rise in costs of housing, energy, mobility and essential services, the NSG reports. The average gross monthly wage in 2024 was €1 882, for a monthly net wage of €1 412.[24] The Portuguese gross minimum wage was 14 payments of €820 per year (equivalent to 12 monthly payments of €957 in 2024).[25] The Portuguese government has announced a plan to raise the minimum wage to 14 payments of €870 per year for 2025, which has already been implemented, and to €1 000 by 2028.

The NSG welcomes these increases but also highlights important disparities. Regional differences such as the degree of urbanization influence the amount and adequacy of wages. Areas such as Lisbon have a high concentration of multinationals, financial institutions and advanced service industries, which typically pay high wages. But the cost of living in these areas is also higher and continues to rise, so the higher pay can still be inadequate for a decent standard of living. This problem particularly affects migrants, as evidenced by the study "The Mapping of the Brazilian Scientific Diaspora in Portugal".[26] This shows that over 40% of highly qualified Brazilian migrants in Portugal work outside their field of expertise. Many have problems in getting their diplomas recognized, so they often work as independent contractors for between €1 000 and €1 500 per month.[27] In rural areas, the cost of living is lower, but the available work is often in low-paying sectors such as accommodation and catering, where people can earn as little as €873.[28]

Women and young people are often paid disproportionately little. The gender pay gap of the Portuguese average wage was 13.2% for 2024, exceeding the EU average of 13%.[29] The Portuguese gap translates to a €242 difference in absolute terms on a monthly basis, the Randstad Research indicates.[30] The NSG highlights several structural reasons for the persistence of the gap, including the overrepresentation of women in lower-paying sectors, career interruptions due to care responsibilities and insufficient transparency in wage-setting. Younger workers and recent graduates face a dual challenge: relatively low-wage entry-level jobs plus higher rates of unemployment and underemployment. Data from the Fundação Francisco Manuel dos Santos (FFMS) shows that 34% of the population holds a tertiary degree, yet many work in jobs that do not reflect these qualifications.[31]

The Portuguese government has announced several initiatives in a multi-faceted strategy to improve wage adequacy. One is progressive tax exemptions for the under-30s, including full exemption from social security contributions during the first year of employment and a phased reduction of this full exemption over the following years. These measures also aim to reduce the rate of emigration of highly qualified young professionals.

#### Job security

Active labour market policies have had a positive effect on employment in Portugal, data from the OECD shows.[32] The employment rate of the 15-64 age group was 72.7% in the second quarter of 2024, above the OECD average of 70.3%. The unemployment rate was 6.6%, higher than the OECD average of 5.1%. However, there are several problems lying beneath the positive headline statistics, the NSG points out. Youth unemployment continues to be worryingly high, increasing to 21.6% in 2024 from 20.5% in 2023, and it is more than three times the general unemployment rate.[33]

The most important structural issue is the prevalence of temporary contracts, which accounted for 13.6% of employees in 2024, according to the Portuguese National Statistics Institute (INE). Only one in five temporary workers manage to transition to permanent roles. [34][35] In 2024, women actually had a higher transition rate to permanent employment at 43.6%. [36]

This high incidence of temporary work is due to several factors, the NSG explains. Portugal's labour law is relatively protective of permanent workers. Their dismissal is costly for employers and requires a lot of administrative work. As a result, many employers rely on temporary contracts, which are subject to less-strict rules. Temporary contracts are also frequently used for part-time employment, and 7% of Portugal's workforce are employed part-time. Women, the young and low-educated workers are disproportionately represented in part-time and temporary employment. Sectoral differences compound these inequalities. Higher-paying sectors, such as tech, finance, and public services often offer the most stable employment, which tends to concentrate in urban hubs such as Lisbon and Porto. Employment in rural and coastal regions is based more on tourism, agriculture and low-skilled services – sectors with a higher incidence of seasonal and precarious contracts. As such, there are significant regional differences in job security in Portugal.[37]

Undocumented migrant workers are another group that are particularly vulnerable both socially and economically. They rely heavily on sectors such as agriculture, construction, domestic work and hospitality.[38] Their undocumented status excludes them from formal employment and social protection schemes, leaving them particularly vulnerable to labour exploitation. This can take various forms: low or below-minimum-wage pay, violations of labour rights and health and safety protection, and threats of deportation by employers if they attempt to assert their rights.[39]

The Portuguese government has adopted several initiatives in recent years to improve job security. The Decent Work Agenda and the Law 13/2023 came into force in May 2023 introducing several reforms to existing labour law. [40] These included the enhancement of

collective bargaining, combatting zero-hour and bogus self-employment contracts and improving the labour rights of precarious workers. Implementation of these reforms has been slow, however, as it has been hindered severely by legal challenges, the NSG reports. Other active labour market policies, such as Estágios,[41] ATIVAR.PT,[42] and INICIAR,[43] incentivize the hiring of long-term unemployed people and young people, and they offer employers incentives to provide stable, full-time positions.



#### Social Inclusion and Protection

### SCORE: 17

#### Housing

Housing has become a grave and pressing social problem, despite it being explicitly recognized as a fundamental right by the Portuguese Constitution.[44] Rental prices have been soaring for the past year and have become impossible for many families to afford, especially in cities. The median rental price per square metre was €15.85 in Lisbon and €12.61 in Porto, according to INE and PORDATA.[45] That means the rent on a 60m² appartement in Lisbon is around €950 – more than Portugal's minimum wage of 14 payments of €870 per year. Even an earner of the average net monthly wage (€1 412) would have to spend more than half that. Over 35% of renters in Portugal suffer from "housing cost overburden" the NSG indicates.[46][47] In other words, they spend more than 40% of their disposable income on housing.

A major cause of the rise in housing prices is international real estate speculation.[48] Over 40% of Lisbon's historic centre is owned by non-residents and investment firms, who use the properties for short-term rentals, according to the Fundação Francisco Manuel dos Santos.[49] Previously low-income, migrant-dense neighbourhoods have become gentrified, pricing traditional residents out and eroding their social networks. The government introduced some measures to ease the financial burden on renters, such as subsidies and an expansion of the "Mais Habitação" (More Housing) programme, which includes tax incentives as well as new credit possibilities for housing construction.[50] However, these are not sufficient to drive down prices, as they seek to deal with the symptoms of the housing crisis and not its root causes. One of these is the extremely low level of Portugal's social housing rental stock – 2% of the national total, compared to an EU average of 9%.[51] This has led to long waiting lists, of up to seven years in the Lisbon area.

Migrants – especially those who are undocumented – remain extremely vulnerable to the housing crisis. The "1.º Direito" (First Right) programme was launched to address housing needs for vulnerable groups, but its implementation has been very slow, and only 15% of its budget had been disbursed by mid-2024.[52] The "Plano de Ação para as Migrações" (Migration Action Plan), which was presented by the Portuguese government in June 2024, only makes vague references to housing and does not contain any concrete goals, budgets, or even accountability mechanisms. More worrying has been the impact of the AlMA transition on vulnerable groups. Many have now become stuck in an impossible legal situation, where they cannot obtain legal status without a lease contract – yet cannot obtain a lease contract without legal status. That means that with no residence permit, these migrants cannot access social housing or other public services. This further intensifies their social vulnerability, as many have to resort to informal housing. The "2024 report Habitação Social em Portugal: Situação Atual e Desafios Futuros" (2024 report Social Housing in Portugal: Current Situation and Future Challenges) by Cáritas Portuguesa highlights how racism is a structural problem in Portuguese housing policy. Private landlords often reject potential renters because of their origin without fear of legal consequences. The priority rules for social housing waiting lists rarely take into account migratory status as a vulnerability factor.[53] Portuguese migration policy in general is based in structural hypocrisy, points out housing expert Luís Mendes.[54] Migrants are heavily relied on for labour in sectors such as construction, agriculture and care work. But they are not provided with quality – or even decent – housing.

This is especially the case for migrants who use the Community of Portuguese Language Countries (CPLP) mobility agreements to apply for residency permits but are unable to leave Portuguese territory in search of better living conditions. (See section above on inclusion of migrants.) Many are forced into substandard housing conditions, as documented by the "Observatório da Habitação, do Arrendamento e da Reabilitação Urbana" (Observatory of Housing, Renting and Urban Regeneration). Fear of being evicted prevents many of these migrants from reporting their appalling living conditions, which range from unsanitary housing due to mould to overcrowding with up to 11 people in a single appartement. The CSO Habita! has documented over 2 300 cases of migrants being

evicted without court orders.[55] Many of these evictions were carried out by private security forces. Complaints to police sometimes met no reaction – and sometimes hostility.[56]

#### **Poverty eradication**

Poverty and social exclusion have become widespread and persistent in Portugal. There are several contributing factors, which compound each other's effects. Official statistics indicate that 19.7% of the population were at-risk-of-poverty or social exclusion in 2024. The autonomous region of the Azores had a particularly high rate, at 28.7%,[57] – though this decreased 0.4 percentage point from 2023 and is below the EU average of 21%. Certain groups have a noticeably higher at-risk-of-poverty rate. Women are more at risk of poverty and social exclusion than men, with 20.9% compared to 18.4%.[58] The rate for people over 65 is higher than average at 20.8%.

The number of working poor in Portugal has grown in recent years, reaching over 10% of workers in 2024, according to Nova SBE's 2024 Social Balance report.[59] The NSG identifies several reasons. Wages did not grow in real terms – that is, they rose thanks to inflation adjustments, but the rises were cancelled out and even exceeded by higher rents, energy bills and food prices. The flat real wages came in spite of the moderate economic growth in Portugal – a notable 7% increase of GDP in 2022, a 2.9% increase in 2023, and a 1.9% increase in 2024. That suggests the problem is a lack of redistribution, stemming from a misalignment between the government's priorities and social reality, according to the NSG's analysis.

This mismatch between policy and social reality has led to difficulties for many families in accessing affordable housing. Short-term rentals, gentrification and a lack of social housing stock have pushed up prices so far that housing has become unaffordable for many households. In urban centres such as Lisbon, many households have to spend more than 60% of their income on rent. Some resort to other measures, such as living in overcrowded apartments or even setting up informal settlements.[60] Immigrants are particularly affected, as they face both bureaucratic hurdles linked to their residency status and discrimination on the rental market. In addition, one of the main routes for undocumented workers to apply for residency permits, the Manifestação de Interesse system, was terminated in June 2024. (See section above on inclusion of migrants.) Whilst a transitional regime has since been approved, the termination is estimated to have left around 400 000 people in legal uncertainty. Without valid residence permits, migrants cannot access public support or social housing, leaving them vulnerable to labour exploitation. Migrant women, in particular, face exclusion beyond the forms experienced by other women, as they are more likely to be in informal or precarious employment. Migrants also find it difficult to access healthcare due to fear of administrative burdens, discrimination and even mistreatment. These fears have been fuelled by examples of pregnant migrant women suffering obstetric violence in the Portuguese healthcare system.[61][62][63]

Many of the roles of public services are now being fulfilled by CSOs, the NSG reports. In particular, shelter services for trans people and people suffering racial discrimination are now mostly provided by CSOs, as trans women and non-binary migrants are typically rejected by public shelters, something denounced by the CSO TransParadise's 2025 Analytical Report. [64] Because the state neglects its duty of protection towards these disadvantaged groups, the burden falls on CSOs, which are underfunded and overwhelmed by the large number of people using their services and their limited resources. This reliance by the state on CSOs to fulfil key public functions is unsustainable and therefore problematic, the NSG points out.



### Civic Space

# SCORE: 17

The CIVICUS Monitor currently classifies Portugal as "Open", a classification that has remained unchanged since 2018.[65] The "Open" classification entails that citizens are free to form associations and that protests can take place without fear of arbitrary restrictions and repercussions. It also entails a robust civic space, where dialogue with policy makers is possible and meaningful. However, this type of dialogue has become increasingly rare in Portugal in recent years, the NSG points out. CIVICUS reports cases of students in pro-Palestine encampments being detained by police.[66]

Involvement of CSOs in civil dialogue

Opportunities for civil society to participate meaningfully in policy making have decreased substantially at various levels of government, the NSG reports. Moreover, the political environment for CSOs has turned increasingly hostile. Consultative processes with civil society have been enshrined in long-standing legal frameworks such as Law no. 66-B/2007 (establishing the Integrated System for Performance Management and Appraisal in Public Administration) and the Open Government Action Plan. But the impact of these processes in practice has significantly narrowed over the last decade. Consultative councils on urban planning and social integration have either become dormant or operate with minimal transparency, according to housing expert Luís Mendes. The city of Lisbon, for example, involves civil society in policy decisions only symbolically listing the consultation of civil society as "informal and exploratory" in its 2024 Open Government Plan. CSOs involved in meetings with the city report having no decision-making power in the meetings.[67] Some municipalities have even preferred to work with consultants or for-profit private actors such as real estate developers instead of establishing partnerships with CSOs.

This decrease in consultation is particularly visible in migration. The transition to the AIMA led to the termination of consultation mechanisms in the previous framework of the High Commission for Migration. (See section above on the inclusion of migrants for other problems related to this transition.) Whilst these mechanisms were not perfect, they did provide a stable forum for civil society to raise concerns and propose initiatives, according to migration expert Cleidi.[68] But no such forum is available with the AIMA, and communications from it are sporadic and sometimes contradictory.

These developments have led to a feeling of fatigue for many CSOs. They are expected to fulfil highly important social tasks – sometimes tasks that the government could or should fulfil – yet have no say in the policies related to these tasks. State support for CSO activities is low, and funding is limited and hard to access. National funding schemes, such as the "Programa Escolhas" (Choices Programme) for education-related projects, have had their budgets cut. Alternatives, such as EU funding, often prove inaccessible for smaller and informal collectives. Civil society in Portugal has professionalized in response to the requirements needed to apply for EU grants. But this has diverted organizations' efforts away from their core missions, according to the NSG. Whilst it is of course important that collectives improve their capabilities, organizations that focus more on deliverables, project cycles, and donor visibility can miss opportunities to improve the quality and impact of their work.

#### **Enabling space for civil society**

The space for civil society in Portugal is becoming increasingly constrained, the NSG reports. This is the result of both deep-seated structural issues and more recent developments, such as an increasingly hostile political climate for CSOs. Portugal lacks a clear framework for civil society and its role, but the government is more than willing to rely on CSOs to take up social responsibilities typically fulfilled by the state. Associations that work with trans and undocumented people, for example, offer emergency shelter, mental health support and basic legal assistance. No state equivalent – or even support – is available. This reality is also described by other CSOs, as well as the NSG.

Because of these demands, many CSOs in Portugal have been experiencing funding difficulties. Immigration support organisations have needed to suspend or drastically reduce their operations and even lay off staff. [69] This is in part due to the chronic underfunding of civil society by the government, as there is no national programme for the core funding of civil society organisations. Programmes dedicated to particular issues have proven unreliable. For example, the Programme for Support to Immigrant Integration was ended without a clear transition plan or alternative source of funding. EU funding often proves inaccessible in practice for smaller organizations, as the application process is highly bureaucratic and dominated by larger organizations.

Civil society also lacks opportunities to contribute meaningfully to consultation processes, partly due to the absence of an enabling framework. Some municipalities have introduced initiatives to allow civil society to contribute to local housing policy. The Municipality of Cascais established a Local Housing Observatory (Observatório Local de Habitação) aimed at deepening the understanding of local housing needs and promoting collaboration between the municipality, research institutions, and community associations.[70] The Municipality of Maia developed a Local Housing Strategy (Estratégia Local de Habitação) that identifies housing shortages and defines local actions to tackle them, integrating community participation and partnerships with public and private actors.[71] While important positive steps, such initiatives remain fragmented and fragile, as they depend on the willingness of individual local politicians.

Another important obstacle is the lack in availability of disaggregated data, which civil society relies on heavily to monitor the effectiveness and inclusivity of policies to point out key policy gaps and social issues. However, Portugal fails to collect and publish data divided into key indicators such as age, race, gender identity, migration status and housing status. This lack hinders the design of adequate and adapted policies, as well the delivery of services, the OECD points out.[72] The Council of Europe has pointed out that the lack of data categorization makes it impossible to determine the scope of discrimination in Portugal. CSOs are often required to collect and publish data on social issues themselves, adding to their already extensive burdens.[73] The NSG itself has had to use qualitative data, such as interviews with experts, because quantitative data was not available.



#### **Just Transition**

SCORE: 50

#### Access to sustainable mobility and transport poverty

Access to mobility remains a persistent problem in Portugal, the NSG reports. Several barriers severely limit the access of vulnerable parts of the population to public transport, possibly contributing to their social exclusion. These barriers can be physical, such as when people with disabilities are unable to access public transport due to broken or unadapted infrastructure.

Workers in precarious jobs often need to travel great distances at irregular hours to reach their jobs. That can make public transport inconvenient and increase their dependence on private services. In rural areas, public transport often does not operate in practice due to budget cutbacks. Cost is another significant barrier, and many families can no longer afford public transport. Migrants, in particular, are often unaware of existing discount schemes, in many cases due to language barriers.

Portugal is making some progress towards affordable transport, the NSG reports. In 2024, over €100 million was allocated to enhance national rail services and infrastructure in Porto and Lisbon.[74] These projects are part of Portugal's 2030 mobility strategy, which sets out ambitious goals such as 40% of urban trips being carried out by walking, cycling or public transport.[75][76] Public tariff reduction programmes, such as the "Incentiva+TP", aim to reduce monthly costs for frequent users, elderly passengers, students, and low-income workers.[77] Lastly, Portugal's mobility regulator, AMT, has clearly expressed itself as in favour of affordable transport. Despite these positive aspects, the strategy does not place enough emphasis on equal access to transport throughout the country's regions, the NSG points out. That said, it does include two pilot projects for flexible public transport and integrated mobility in low-density regions.[78][79] One of these has been launched in the historically underserved Beira Interior region and focuses on community-centred models with flexible scheduling.

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Co-Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union. The European Union cannot be held responsible for them.