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POST-2020 EU ROMA STRATEGY: THE WAY FORWARD

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MAIN ACRONYMS

| | |
|------|---|
| CSO | Civil Society Organisation |
| CSR | Country Specific Recommendations |
| DG | Commission's Directorate-General |
| EC | European Commission |
| ECA | European Court of Auditors |
| EP | European Parliament |
| ESF | European Social Fund |
| EU | European Union |
| IPA | Instrument for Pre-accession Assistance |
| MEP | Member of the European Parliament |
| MFF | Multiannual Financial Framework |
| NRIS | National Roma Integration Strategies |

EXECUTIVE SUMMARY

The 2011 EU Framework for National Roma Integration Strategies (the EU Roma Framework) up to 2020 set ambitious goals to close the gap between Roma and non-Roma in the key policy areas of education, employment, housing and health, as well as to protect Roma against discrimination. It has managed to push almost all member states, including the enlargement countries, to develop National Roma Integration Strategies (NRIS), relevant policies and funding measures to address the challenges Roma face. Nevertheless, as the only policy designed by the European Commission (EC) specifically targeting the Roma minority in Europe, the EU Roma Framework has faced many challenges in reaching its goals. Since 2011, the EC has published yearly progress reports. The latest EC Evaluation on the EU Framework for NRIS in 2018 provides the most comprehensive state-of-play on this Roma policy, and signals ways forward.

This paper aims to provide an analysis of the EC Evaluation by focusing on three main areas: 1) the achievements, 2) the challenges and 3) the elements and recommendations that the next post-2020 EU Roma Framework for NRIS should contain. Furthermore, the study examines the Evaluation by using recent reports and information from the ground, provided by Open Society Foundations' programmes and partners listed in the introduction part of the paper.

The main finding is that, although there are number of achievements since 2011, the EU Roma Framework for NRIS fails to achieve its goals in all policy areas, including discrimination. Its objectives have been unrealistic and did not consider some crucial missing elements, which need to be taken up in a future strategy.

The study recommends to upgrade the next EU Roma Framework to a fully fledged strategy, and make the goals in the four policy areas more concrete and realistic to achieve. The paper argues that the EC should make the next EU Roma Strategy obligatory for member states and put the fight against antigypsyism at the forefront of every policy area. The future strategy should build on the listed successes in chapter one, for example the Council Initiatives, the EU Roma week, the Roma Civil Monitor, the enlargement successes. It should also integrate important issues regarding Roma which were missing before, namely a focus on Roma arts and culture, entrepreneurship opportunities and support to Roma in EU enlargement countries. Priority areas for EU attention include higher coordination, funding mechanisms, data and monitoring, and combining targeted and mainstream approach to Roma policies.

Finally, it should take into consideration how the heterogeneity of Roma affects effective policy-making in this field. If the next EU Roma Strategy aims to achieve full Roma inclusion in the future, EU and member-state policy-makers should start from ensuring Roma participation in all decision-making processes. A good start would be to include them in the design of the next EU Roma Strategy post-2020 and the future NRIS.

INTRODUCTION

The EU Framework for National Roma Integration Strategies up to 2020¹ (hereafter referred to as the EU Roma Framework) is the first ever EU initiative to target exclusively a single minority group. This policy aimed to improve the lives of nearly 12 million Roma,² of whom six million are living in the European Union (EU), in the areas of education, employment, health, housing and anti-discrimination. Although Roma are the largest ethnic minority in Europe, existing international, national and local policies, funds and legislation have not made a visible impact on their daily experience of antigypsyism, school segregation, high unemployment rates, inadequate housing conditions, poor access to health, and wide-ranging discrimination. These elements have contributed to decades of social exclusion and deprivation of what constitute citizens' rights.

In December 2018, the European Commission (EC) presented the main findings of the Mid-term Evaluation of the EU Framework (hereafter referred to as the Evaluation) for National Roma Integration Strategies up to 2020 (NRIS).³ The Evaluation's main purpose is to guide the EC on the progress made so far and to pave the way forward after 2020. The EC then invited civil society representatives to send their written feedback on the results of the Evaluation, as well as reflections on the key findings, with a post-2020 EU Roma initiative in mind.

This paper analyses the EC Evaluation, including of the enlargement countries, and proposes key recommendations based on our field experience to the EC for its post-2020 EU Roma Strategy.

Prepared by Open Society European Policy Institute, this paper includes the contributions of seven Open Society Foundations programs, namely the Education Support Programme, the Early Childhood Programme, the Human Rights Initiative, the Open Society Justice Initiative, the Open Society Initiative for Europe, the Public Health Programme and the Roma Initiatives Office. In addition, we thank Ms. Rita Fober, policy adviser of MEP Soraya Post, and five partner organisations for their valuable contribution. The organizations are the Roma Entrepreneurship Development Initiative (REDI), the European Roma Institute for Arts and Culture (ERAC), the European Roma Grassroots Organisations Network (ERGO), the European Roma Rights Centre (ERRC) and the Roma Education Fund (REF).

1 <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1444910104414&uri=CELEX:52011DC0173>

2 <https://fra.europa.eu/en/theme/roma>

3 See COM(2018) 785: Final communication from the Commission to the European Parliament and the Council. *Report on the evaluation of the EU Framework for National Roma Integration Strategies up to 2020*

ANALYSIS OF THE EVALUATION OF THE EU FRAMEWORK FOR NRIS UP TO 2020

An Evaluation of the Framework was carried out by the EC covering the period of 2011-2017, following the recommendations of the Council Conclusions⁴ on Roma in 2016. The Evaluation is the first and the most comprehensive report that the EC has invested in since the EU Roma Framework began. Besides the four priority areas - education, employment, healthcare and housing - the Evaluation has also focused on antigypsyism, available instruments, structures, policies, funds and legislation, looking at how relevant, effective, coherent and efficient these are, and whether the EU has added value. This chapter scrutinises the published findings of the Evaluation by focusing firstly on the achievements - based on our independent assessment - and secondly on the EU Roma Framework's ongoing challenges.

ACHIEVEMENTS

It is generally agreed among activists and policymakers that the main added value of the EU Roma Framework is to have brought Roma inclusion onto the agenda of the EU institutions, national governments and some enlargement countries since 2011, and kept it there. Thanks to

the EU Roma Framework, the EU and government institutions have increased the use of a number of available policy instruments. In addition, they have also created new policy instruments, structures and legislation aimed at preventing the socio-economic exclusion of Roma and discrimination against them. Below we provide an overview of all the accomplishments of which we are aware following the Framework's creation in 2011.

Council initiatives

Since the launch of the EU Roma Framework, four Council initiatives were put in place. These are important milestones on Roma inclusion in the EU:

- In 2011⁵ the '*Council conclusions on an EU Framework for National Roma Integration Strategies up to 2020*' gave a boost to Member States to develop their NRIS.
- In 2013⁶ the '*Council recommendation on effective Roma integration measures in the member states*' was the first legal instrument on Roma, which obliged member states to report to the EC annually on the progress achieved in implementing their NRIS.

4 <http://data.consilium.europa.eu/doc/document/ST-15406-2016-INIT/en/pdf>

5 https://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/lsa/122100.pdf

6 https://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/lsa/139979.pdf

- In 2016⁷ the ‘*Accelerating the Process of Roma Integration - Council Conclusions*’ for the first time recognised antigypsyism as the root cause of Roma social exclusion and discrimination, and asked the EC to propose a post-2020 strategy on Roma integration.
- In 2019⁸ the Romanian presidency of the Council of the European Union prepared a note⁹ to the member states delegations in Brussels, which emphasised the need for the EC to propose an ambitious new EU framework for the post-2020 period on Roma integration, and called on member states and enlargement countries to do the same.

One important recent initiative is the announcement by the German foreign minister Heiko Maas that his government will advance a post-2020 EU Roma Strategy during Germany’s EU presidency,¹⁰ due in the second half of 2020. The new strategy will call on member states to continue working on Roma inclusion.

The EU Roma Week

The first EU Roma Week¹¹ took place in 2016 and was organised by Civil Society Organisations (CSOs) in Brussels and a number of Members of the European Parliament (MEPs), on the occasion of 8 April - International Roma Day. The main achievement of the EU Roma Week is to have kept Roma inclusion on the agenda of both EP and EC. It has been an annual hub of networking and awareness-raising between

politicians, policymakers, experts and activists. Since 2017 the initiative has enjoyed the patronage of Vera Jourová, the Commissioner for Justice, Consumers and Gender Equality (DG JUST), together with the Directorate-General for Neighbourhood and Enlargement Negotiations (DG NEAR).

Resolutions by the European Parliament

Over the years, the European Parliament (EP) has passed many resolutions¹² addressing the Roma population. These have boosted awareness of the topic among Brussels and national policymakers. As of 2011, the EP adopted four resolutions emphasising antigypsyism:

- The Resolution of March 2011 on the ‘*EU strategy on Roma inclusion*’¹³ called on the EC and member states to create a concrete strategy and policies targeting the Roma population in Europe.
- The Resolution in 2015,¹⁴ ‘*International Roma Day – anti-Gypsyism in Europe and EU recognition of the memorial day of the Roma genocide during WWII*’.
- The Resolution in 2017 ‘*On fundamental rights aspects in Roma integration in the EU: fighting anti-Gypsyism*’¹⁵ is the most comprehensive resolution and was proposed by MEP Soraya Post.¹⁶ It called for a Truth and Reconciliation Commission and asked the EC to focus on antigypsyism in the post-2020 EU Framework, in addition to social inclusion.

7 <http://data.consilium.europa.eu/doc/document/ST-15406-2016-INIT/en/pdf>

8 <http://data.consilium.europa.eu/doc/document/ST-7003-2019-INIT/en/pdf>

9 NB: This document was prepared in March 2019, following the High Level Conference on the EU Framework for National Roma Integration Strategies in Bucharest

10 <https://www.auswaertiges-amt.de/en/newsroom/news/maas-futuroma/2217696>

11 <https://www.ardi-ep.eu/roma-week/>

12 <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P6-TA-2005-0151+0+DOC+XML+V0//EN>

13 <http://www.europarl.europa.eu/sides/getDoc.do?type=TA&reference=P7-TA-2011-0092&language=EN>

14 <http://www.europarl.europa.eu/sides/getDoc.do?type=TA&language=EN&reference=P8-TA-2015-0095>

15 <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P8-TA-2017-0413+0+DOC+XML+V0//EN>

16 Soraya Post is from the Group of the Progressive Alliance of Socialists and Democrats in the European Parliament, Sweden - Feministiskt initiativ (Sweden)

- The latest resolution, from February 2019: ‘*On the need for a strengthened post-2020 Strategic EU Framework for National Roma Integration Strategies and stepping up the fight against anti-Gypsyism*’.¹⁷

Roma Civil Monitor

The EU pilot project ‘*Capacity building for Roma civil society and strengthening its involvement in the monitoring of national Roma integration strategies*’ - known as Roma Civil Monitor - is another landmark achievement. This initiative was proposed by MEP Kinga Gonz in the EP term of 2009-2014. It aimed to build on the Decade of Roma Inclusion Secretariat¹⁸ practice and to prepare shadow reports by CSOs on the implementation of Roma strategies and policies at national level. Thanks to DG JUST’s project implementation, the first cycle of Civil Society Monitoring reports has been published on the implementation of the NRIS in 27 countries in the EU.¹⁹ This is an important positive practice to build on as for the first time the EC has involved Roma and pro-Roma CSOs and experts (almost 90 actors altogether) in the systematic monitoring of policies targeting the Roma population at the national and local level.

Infringement proceedings

The EC has launched three infringement proceedings on Roma school discrimination against three member states - the Czech Republic²⁰ in 2014, Slovakia in 2015²¹ and Hungary²² in 2016. This is a turning point for the EC in regard to justice and rule

of law in monitoring member states’ implementation of the Racial Equality Directive. Another crucial step is that following the proceedings the EC began ‘fact-finding missions’, visiting member states and checking the situation of Roma population on the ground. Such meetings are periodically carried out in the three EU countries mentioned above.

EU funding

Structural funds

Between the 2014 and 2020 the EU has designated some 1.5 billion²³ euros, targeting marginalised communities such as Roma. Despite this fact, there is still a lack of evidence that the funds spent on Roma inclusion had an impact on the lives of Roma. However, some progress needs to be acknowledged. One main success is that the European Structural and Investment Funds (ESIF) regulations established an explicit link between the EU Roma framework and the EU funding:

- Roma people have been prioritised in the ESIF (also called Structural Funds²⁴) regulations as an investment priority. In addition, the European Social Fund (ESF) has been redesigned to enable more flexibility for member states to target building skills for excluded groups.
- The *ex-ante* conditionality under two structural funds, specifically thematic Objective 9, now requires that ‘a national Roma inclusion strategic policy framework is in place’²⁵. This means that the thematic *ex ante* conditionality is now linked

17 <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P8-TA-2019-0075+0+DOC+XML+VO//EN&language=EN>

18 <https://www.rcc.int/romaintegration2020/pages/4/roma-decade-and-the-eu>

19 <https://cps.ceu.edu/roma-civil-monitor>

20 <https://www.opensocietyfoundations.org/press-releases/brussels-takes-action-against-czech-republic-over-roma-school-discrimination>

21 <https://www.opensocietyfoundations.org/press-releases/european-commission-targets-slovakia-over-roma-school-discrimination>

22 http://europa.eu/rapid/press-release_MEMO-16-1823_EN.htm

23 <https://www.eca.europa.eu/en/Pages/DocItem.aspx?did=36850>

24 ESIF regulations (Council Reg. (EU) No 1303/2013 and Council Reg. (EU) No 1304/2013)

25 https://www.euromanet.eu/wp-content/uploads/2018/02/EURoma-Report_Promoting-Use-of-ESI-Funds-for-Roma-Inclusion_Executive_Summary_Full-Report.pdf

to this investment priority and three others in the European Regional Development Fund (ERDF), dealing with investment in health and social infrastructure, support for regeneration of deprived communities and investment in education and training infrastructure. Moreover, the fulfilment criteria for this thematic *ex ante* conditionality were fully aligned with the objectives of the EU Roma framework. Objective 9 means that Central European member states - which had previously not allocated funding for Roma - are now doing so.

- In 2011 and 2015, the EC issued thematic guidance on the use of ESIF in tackling educational and spatial segregation. It then prepared thematic guidance for ESF desk officers in 2014 on how to operationalise the objectives of the EU framework for the ESI funds.

It is important to note that it will only be possible to analyse the effects of these improvements after 2020, when member states will submit reports to the EC on their use of EU funds for Roma integration initiatives.

Direct funds

The directly managed funds from the EC are small in comparison to structural funds. However, they are important as they can directly support CSOs and ensure they can act as watchdogs for national authorities in member states.

- While in the 2007-2013 programming period the EC targeted Roma only as a disadvantaged group, in the 2014-2020 period funding for the integration of Roma was made a priority thanks to two instruments: the Rights, Equality and Citizenship Programme (from DG JUST) and the Instrument for Pre-Accession Assistance.

- The EC - in particular DG JUST, DG EMPL and DG NEAR - currently has direct funds which support projects on Roma inclusion and anti-discrimination activities. This is a step forward, as NGOs need direct support from the EC to secure independence from government funding and to play their role as civic organisations. An example of direct funding is the *Rights, Equality and Citizenship Programme*, which has so far paid for about EUR 6.9m of Roma-related projects.²⁶ The EC has also co-funded influential projects such as ROMACT²⁷ since 2013, which aims to bring together local authorities and Roma communities to develop inclusive policies and public services, implemented by the Council of Europe.
- The Youth Guarantee provides a first experience in the job market via paid internships and stronger partnership with the private sector. The Employment and Social Innovation program (EaSI), on the other hand, has been designed to enable self-employed people and entrepreneurs from Roma communities to access capital guarantees and technical assistance. Spain²⁸, Sweden, Bulgaria and Romania targeted Roma under this programme.

Combating antigypsyism

During the last few years, the EP, the EC and the Council have acknowledged the need to recognise antigypsyism as a specific form of racism against Roma, Sinti, Travellers and other groups stigmatised as ‘gypsies’.²⁹ This is a breakthrough for Roma civil society, which has been raising this issue for decades. Since 2011, antigypsyism has been frequently mentioned and emphasised in policy documents from the Council, the EP and the EC, as well as during EU events as follows:

26 <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018SC0480&from=EN>, p.90

27 <http://coe-romact.org/about-romact>

28 Foundation for the Roma Secretariat (Fundación Secretariado Gitano) (2016), *Study - Map on Housing and the Roma Community in Spain*, 2015 (Estudio-Mapa sobre Vivienda y Población Gitana, 2015), September 2016

29 Alliance against Antigypsyism defines antigypsyism as the main cause of exclusion of Roma people and the most acceptable form of racism in Europe. Read more in *Antigypsyism - a reference paper*, available at www.antigypsyism.eu

- The 2013 Council Recommendation³⁰ highlighted the need to fight antigypsyism and the 2016 Council conclusions referred to antigypsyism and to the recognition and commemoration of the Roma Holocaust.
- At the 2015 European platform for Roma inclusion,³¹ antigypsyism was for the first time a priority on the EC agenda, which raised awareness on this issue among European and national policymakers, activists and other institutional stakeholders.
- European Roma and pro-Roma civil society produced an unprecedented amount of reports and studies³² on antigypsyism.³³
- The EP took a position on a post-2020 strategy in its report of October 2017 on the *Fundamental rights aspects in Roma integration in the EU: fighting anti-Gypsyism* (2017/2038(INI)), which highlights persistent antigypsyism in the political sphere and societies across Europe.
- As a follow-up to MEP Post's report³⁴ in 2017, there are two policy papers produced on antigypsyism. Firstly, the FRA produced its first ever report in 2018 on antigypsyism which examines the phenomenon and its effect on Roma inclusion, including data on key manifestations of antigypsyism, namely discrimination, harassment and hate crime. Secondly, the EP's Policy Department for Citizens' Rights and Constitutional Affairs published a study in 2019 on *Scaling up Roma Inclusion*

*Strategies: Truth, reconciliation and justice for addressing anti-Gypsyism*³⁵. The study explores addressing antigypsyism by setting up a Truth and Reconciliation Process at the EU level.

- The 2018 high-level group on combating Racism and Xenophobia, created and coordinated by the EC, published a conclusion paper on antigypsyism³⁶, outlining specific actions which member states and EC services could take to address it.
- The Roma Civil Monitor project issued *A synthesis of civil society's reports on the implementation of national Roma integration strategies in the European Union* in 2018, containing a chapter on combating antigypsyism in 27 member states.
- The Austrian EU presidency organised a conference on antigypsyism in October 2018³⁷.
- In the latest EP resolution from February 2019 (previously mentioned)³⁸ there is also a strong focus on antigypsyism.³⁹

Coordination initiatives by the EC

- Within the EC, DG JUST organises consultation meetings two to three times a year between CSOs in Brussels and EC services to discuss the state of play on Roma in the EC. These meetings are a step towards recognition of the meaningful contribution Roma and non-Roma activists and stakeholders make in EC policy-related processes and events.

30 https://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/lisa/139979.pdf

31 https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-and-eu/european-platform-roma-inclusion_en

32 <https://www.ceps.eu/publications/combating-institutional-antigypsyism-responses-and-promising-practices-eu-and-selected>

33 <http://antigypsyism.eu/>

34 http://www.europarl.europa.eu/doceo/document/A-8-2017-0294_EN.html

35 [http://www.europarl.europa.eu/RegData/etudes/STUD/2019/608859/IPOL_STU\(2019\)608859_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/STUD/2019/608859/IPOL_STU(2019)608859_EN.pdf)

36 https://ec.europa.eu/newsroom/just/document.cfm?doc_id=55652

37 https://www.eumonitor.eu/9353000/1/j9vvik7m1c3gyxp/vkoeikk7guy2?ctx=vkipixf4atvn&start_tab1=40

38 *On the need for a strengthened post-2020 Strategic EU Framework for National Roma Integration Strategies and stepping up the fight against anti-Gypsyism*

39 https://www.europarl.europa.eu/sides/getDoc.do?type=MOTION&reference=B8-2019-0098&format=XML&language=EN&fbclid=IwAR2rYlp8PQr_hLht29UQuXg-qrgsnKjb3b_XTekwAgUWTOF7JbDdW5yk1WQ

- The EC organises an annual European Platform for Roma Inclusion,⁴⁰ which brings together national governments, EU policy makers, international organisations and Roma civil society representatives in order to foster cooperation and the exchange of experiences. So far the EC has organised twelve meetings of the Platform. Its main achievements are in raising important subjects such as antigypsyism, promoting networking among its participants and reminding national governments of their commitments on Roma inclusion. Two years ago the EC asked member states to do the same and organise national platforms for activists from local and national levels.
- Through the European Semester, the EC steers and monitors member states' actions in order to make mainstream policies more inclusive for Roma. Five countries have been receiving Country-Specific Recommendations (CSRs) on Roma inclusion since 2012. These recommendations covered mainly the areas of education, with a limited focus on employment and poverty reduction. The EC has also used CSRs to steer funding priorities on Roma inclusion in the 2014-2020 programming period.
- The Roma task force⁴¹, created in 2010 with the goal of evaluating EU funds for Roma inclusion, led to the setting up of the EU framework and is currently the EC's internal group involving several DGs⁴² and the FRA.

Enlargement successes

Although the EU Roma Framework mainly focuses on EU countries, it is also committed to working on promoting Roma integration beyond the EU, in particular in enlargement countries. Lessons

learned from past accessions suggest that promoting Roma integration requires an enhanced political commitment to Roma inclusion, and thus it has been a priority within the enlargement and accession processes. The EC has also included enlargement countries in its 2016 report on the implementation of the EU Roma Framework, and they will be part of the 2019 update both as regards the NRIS implementation and the CSO report. Overall, the EC has always included Roma in its reports and communications on enlargement countries, which is an important step in order to align the Roma policy, legal and financial instruments of enlargement countries on their path to join the EU. Some of the concrete achievements⁴³ of DG NEAR include:

- Appointment of a Special Adviser to coordinate Roma integration policies in the enlargement region.
- Organising the Roma integration Award to recognise the contributions of the Roma CSOs to Roma inclusion in the region (such as the award for Roma women organised in 2019, the award for Roma CSO organizations working with Roma youth in 2017 and the award for Roma Civil society organizations in 2014).
- Introduction of Roma Seminars, as a policy dialogue on Roma integration between the EU and enlargement countries. These seminars, co-hosted by EC and national governments, bring together civil servants, officials, civil society, international organisations, academia and other stakeholders to monitor progress and agree on the future of Roma integration priorities.
- Roma integration has been mainstreamed into European enlargement policies and explicitly identified as one of the key priority areas in all EC enlargement strategies, adopted since 2011;

40 https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-and-eu/european-platform-roma-inclusion_en#how-the-platform-works

41 https://ec.europa.eu/info/sites/info/files/swd_2018_480_1.pdf

42 Namely: Justice and Consumers (JUST), Employment, Social Affairs and Inclusion (EMPL), Education, Youth, Sport and Culture (EAC), Health and Food Safety (SANTE), European Neighbourhood Policy and Enlargement Negotiation (NEAR), Migration and Home Affairs (HOME), Regional and Urban Policy (REGIO), Agriculture and Rural Development (AGRI)

43 https://ec.europa.eu/neighbourhood-enlargement/news_corner/news/winners-roma-award-western-balkans-and-turkey-will-be-announced-28-march_en/eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018SC0480&from=EN

progress on Roma integration is now also fully included in the negotiations of enlargement Chapter 23 ‘Judiciary and Fundamental Rights’; the EC analyses the state of play by country in the context of the annual enlargement package, and Roma-specific recommendations are regularly part of country progress reports.

- Introduction in the enlargement region of successful tools implemented by member states: National Roma Contact Point network, national Roma platforms and annual monitoring reports using a similar questionnaire than member states.
- DG NEAR provides a direct grant to the Regional Cooperation Council to create a ‘Roma Integration 2020’ action team, as an initiative co-funded with the Open Society Foundations to provide technical assistance on Roma integration to the governments in the enlargement region. This is unique from the EC side and an important success on funding for Roma. The project aims to reduce the socio-economic gap between the Roma and non-Roma population in the Western Balkans and Turkey and to strengthen the institutional obligations of governments towards Roma.
- In 2017, the EC through IPA funds commissioned the Council of Europe to support Roma integration at local level through ROMACTED project. This projects aims to implement in the enlargement region the best of the results of ROMED and ROMACT. This program focused on local governments’ initiatives to improve governance and empower Roma at local level.
- Based on the FRA Roma survey, DG NEAR, with IPA Funds, commissioned the United Nations Development Programme (UNDP) and the World Bank in 2017 to conduct a regional Roma survey in six countries of the Western Balkans⁴⁴. The survey examines living conditions and key human development outcomes within Roma households and non-Roma living nearby. It also defines the

base line for assessing future progress. The two organisations were asked by DG NEAR to present a study analyzing the return process from member states to the region of Western Balkans citizens, with special attention to Roma.

- Regional and country IPA programmes prioritise Roma, and as a result IPA-funded programmes targeting Roma specifically are being implemented in all enlargement countries. In 2014 DG NEAR launched an evaluation on the use of IPA I Funds for Roma integration. The 10 recommendations produced by the evaluators have been implemented.
- Within the framework of the DG NEAR IPA project ‘Joint Initiative to Empower Roma Civil Society in the Western Balkans and Turkey’ coordinated by Roma Active Albania, ERGO Network Secretariat and its partners, submitted amendments to the country reports for the Western Balkans and Turkey prepared by the EP Committee on Foreign Affairs⁴⁵. This project has contributed to the EC assessment of the enlargement package through shadow reporting and has ensured the participation of enlargement CSOs in the regional events.

EU bodies

Besides the role of the European institutions and the listed initiatives above, there are two EU bodies that have also made a significant difference to the EU Roma Policy Framework. These are the European Agency for Fundamental Rights (FRA) and the European Court of Auditors (ECA).

Following the adoption of the EU Roma Framework, the FRA has developed a multi-annual Roma Programme from 2012 to 2020, which led to the publication of regular reports⁴⁶ with data on progress made in member states towards the Framework, including discrimination and more recently

44 *Regional Roma Survey 2017: Country fact sheets*, <http://www.eurasia.undp.org/content/rbec/en/home/library/roma/regional-roma-survey-2017-country-fact-sheets.html>

45 <http://www.europarl.europa.eu/committees/en/afet/home.html>

46 <https://fra.europa.eu/en/project/2015/second-european-union-minorities-and-discrimination-survey>

antigypsyism⁴⁷ and Roma participation⁴⁸. Thanks to the FRA, the EC and governments now have concrete evidence and data on what could be done to improve the lives of Roma in the EU. Since 2017 North Macedonia and 2018 Serbia, have a status of “observer” to FRA, which opens the door to include the first Western Balkans countries in future reports. It is expected the Albania will also become a member in 2019.

The ECA⁴⁹ issued a report in 2016 aiming to understand whether EU policy initiatives and financial support had contributed effectively to Roma integration during the last decade in four EU member states: Bulgaria, Spain, Hungary and Romania. Unfortunately, this came too late to have an impact on programmes and projects for 2007-2013, and some flaws have persisted.

PERSISTENT CHALLENGES

Although the EU Roma Framework has many achievements, it also faces many challenges. While the Framework recommended that every EU member state should adopt its own NRIS, this has not led to significant improvements in the living conditions of Roma across Europe. The Framework’s goals, design and purpose have been jeopardised from its inception because crucial elements have been missing. The following considerations could be incorporated into the post-2020 EU Roma strategy.

Non-binding character of the EU Roma Framework

The first major challenge which hinders the effectiveness of the Framework is its non-binding nature - an argument that has been frequently raised by CSOs. As a soft-policy instrument, the Framework leaves it up to member states to decide whether

and how to design their NRIS, depending on the current political agenda and priorities. As a result, governments have not prioritised the allocation of sufficient funding or included robust monitoring, and they have not designed, implemented and monitored NRIS in cooperation with Roma CSOs. Moreover, this flexibility gave national authorities the freedom to decide the extent to which they will fulfil the Roma Integration goals set by the Framework in the four priority areas. Only 15 member states developed and adopted NRIS, while the other 12 only have measures on Roma inclusion. The Evaluation made an attempt to highlight the weakness of the non-binding approach of the Framework, but it did not make this clear enough.

Combating antigypsyism

The EU Roma Framework has not put forward any goals in the area of discrimination. Nor has it placed any focus on other manifestations of antigypsyism. The main suggestion coming from the Framework was to use existing anti-discrimination instruments such as the Racial Equality Directive (RED) and the Framework Decision on combating racism and xenophobia by means of criminal law, which assumes that governments will take the initiative to ensure that discrimination, hate speech and hate crime against Roma do not happen. While the RED has a direct legal effect in all member states, it does not automatically create a conditionality upon which NRIS are compliant with RED in all four areas of policy and inclusion interventions. Moreover, existing evidence of widespread discrimination against Roma strongly suggests that the Racial Equality Directive is not effective. As FRA has suggested, the EU and member states need to make a critical assessment of why this is the case and what measures are required to remedy it.

47 <https://fra.europa.eu/en/publication/2018/roma-inclusion>

48 <https://fra.europa.eu/en/publication/2018/empowering-roma>

49 <https://www.eca.europa.eu/en/Pages/DocItem.aspx?did=36850>

CSOs stressed that⁵⁰ the EP and the EC have started to realise that the crucial question is not in acknowledging discrimination *per se*, which is the consequence of the issue. The real challenge is recognising and fighting against the widespread antigypsyism in the societies where Roma live. Civil society coalitions such as the Alliance against Antigypsyism have reported to EU and national government institutions that antigypsyism should be recognised as a specific form of racism, and that it is the biggest barrier to equal acceptance by society that Roma face. Without this recognition, in law and policy, the root causes of Roma exclusion and marginalisation cannot be addressed.

The Roma Civil Monitor reports⁵¹ that combating antigypsyism is not a priority within the EU, despite the existence of anti-discrimination legislation. In most member states, there is no explicit recognition of antigypsyism in state policies, legislative or other documents. Despite some progress with respect to commemorating the Roma genocide at the European and/or national level, the NRIS fail to recognise the multiple dimensions of antigypsyism and an appreciation of the historical legacy of exclusion is missing from national policies. Across the EU, there is very little knowledge and acceptance of the Roma genocide. Roma are not recognised as either victims or as part of the resistance to the Nazi regime. Furthermore, examples of promising practices of combating antigypsyist speech and hate crime are rare.

Four policy areas: education, employment, housing and health

The third challenge concerns the four priority areas of the Framework: education, employment, housing and health and the corresponding goals.⁵²

Education

The goal of the EU Roma Framework on education is to “ensure that all Roma children complete, as a minimum, primary school education”. Of the four areas, education is the only area where the Evaluation reported tangible progress. The EC’s 2016 assessment⁵³ stressed that, while more governments have now focused on early childhood education, hostility to Roma has increased and their living conditions have worsened. Although the Evaluation points out that more children now have access to education, school attendance has improved and early leaving has fallen, it is difficult to measure improvements - especially with disaggregated data on Roma pupils and students missing or inadequate. Moreover, the goal’s focus on access alone fails to reflect the Framework’s recognition of the importance of equitable access to quality education and the effectiveness of inclusive measures. Unless attention is paid to both, improvements in enrolment may well disguise increasing exclusion.

According to CSOs such as the Roma Education Fund, the root cause of why Roma children continue to be discriminated against and placed in segregated schools, is the widespread antigypsyism in the societies where Roma live in, which includes institutional Roma racism, coming primarily from public services like education institutions. This is why segregation of Roma children in schools has worsened, and the reports from the Roma Civil Monitor⁵⁴ confirm that this means they are being denied access to good-quality, integrated and fully inclusive education. Indeed, their quality of education is considerably lower than the national average. For instance, equipment, teaching methods and teachers’ motivation are worse than in mainstream schools. Thus, segregated school

50 See *A reference paper on antigypsyism*, Alliance Against Antigypsyism, 2017 <http://antigypsyism.eu/wp-content/uploads/2017/12/2017-12-Recommendations-to-fight-antigypsyism.pdf>

51 <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-1-synthesis27-2017-eprint-fin.pdf>

52 <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52011DC0173&from=EN>

53 <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A52016DC0424>

54 See Roma Civil Monitor, *A synthesis of civil society’s reports on the implementation of national Roma integration strategies in the European Union: Focusing on structural and horizontal preconditions for a successful implementation* <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-1-synthesis27-2017-eprint-fin.pdf>

settings are not only problematic from a legal and educational point of view, but discourage social and economic inclusion.

This situation persists despite rulings from national courts and precedent-setting judgments from the European Court of Human Rights (ECtHR), as well as ongoing infringement proceedings against the Czech Republic, Slovakia and Hungary. Although placing Roma children into special schools has been declared illegal in these countries, Slovakia continues to build separate units such as container schools with public funds, and in Romania, 29% of Roma children are *de facto* educated in segregated schools.⁵⁵ Furthermore, in Bulgaria, 26% of Roma children are educated in segregated settings, and around 50% of students in remedial special schools are Roma⁵⁶. The situation is similar in Hungary where around 45% of Roma children are placed in either segregated schools or classes⁵⁷.

In addition to the issue of segregation, Roma bullying is another persistent problem that Roma children face. Roma bullying in schools is acknowledged as an insidious form of discrimination both within and outside schools. For instance, in Serbia and in the Czech Republic racial bullying in schools is beginning to be accepted or normalised institutionally as well as in the media. According to the ERRC there are data from 2017 about the discriminatory treatment of Roma children in mainstream education, which shows that 46% of the interviewees confirmed that Roma bullying did indeed take place. The most common reasons given were that teachers ignored Roma students (50%); the student had to sit in the back of the class (50%); and the teachers humiliated the student in front of their peers (39%). The most common reasons why students who additionally experienced bullying in mainstream schools were Romani ethnicity (75%), cognitive, psychological, physical or social challenges

(42%) and poverty (33%). Roma children are not receiving enough assistance to enable them to stay in mainstream schools and are therefore often advised to go to Education of Pupils with Disabilities (EPD) – a classic example of ‘Romaphobia’ or ‘antigypsyism’, pathologising Roma identity as a ‘disability’. In addition, Roma parents are not informed (71% of respondents to ERRC survey) about the advantages and disadvantages of attending the EPD schools, or that they have the right to refuse it.

For more information about the problems of early school leaving, kindergarten provision, segregation and the bullying of Roma children, please see the Annex.

Employment

The goal identified in the Framework to “*cut the employment gap between Roma and the rest of the population*” was overly ambitious, and therefore could not be reached. For example, the survey carried out by the FRA shows that one in four Roma declared their main activity as being in “paid work” in 2016, with no change since 2011. What is really concerning is that in some countries the trend is moving in the opposite direction: there are slightly more unemployed Roma in 2019 (75%) than there were in 2011 (74%). In comparison during the same period, employment for the mainstream population has increased steadily in all countries surveyed⁵⁸. Moreover, while the unemployment rate has fallen in the EU, workforce demand has increased because of the growth in the number of elderly people. More participation by Roma in the workforce could help meet this demand.

One major issue is the persistent discrimination against Roma in employment. According to FRA⁵⁹, the majority of Roma consider that they experience discrimination when looking for work. This examples

55 Ibid

56 see FRA, *Second European Union Minorities and Discriminatory Service, Roma Selected Findings, 2016*; European Commission, *Education and Training Monitor Bulgaria 2016*; REF Country Assessment - *Advancing the Education of Roma in Bulgaria, 2015*

57 Bernard Rorke, *Segregation in Hungary: The Long Road to Infringement*, ERRC, 2016

58 FRA, *Second European Union Minorities and Discrimination Survey Roma – Selected findings, 2016*

59 FRA, *Poverty and employment: the situation of Roma in 11 EU Member States Roma survey – Data in focus, 2016*

resonates with the fact that many employers in countries with large Roma populations, have stereotypes against Roma, and thus are reluctant to recruit a Roma employee if a non-Roma with a similar level of skills is available. As a result, more among young Roma are unemployed. During 2011 and 2016, there was an increase from 56% to 63% in the number of young Roma people between 16 and 24 years old who were not in education, training or employed (NEET).

Nevertheless, the striking numbers above, there are promising initiatives that can boost employment among Roma. One particular example is the projects which target access to finance for Roma entrepreneurs, such as Kiútprogram- “Way Out” (2012, Hungary)⁶⁰ and the Roma Entrepreneurship Development Initiative⁶¹ (2015-2016, Romania and Bulgaria). The two initiatives make sure that they provide not just technical assistance to entrepreneurs, but also adapt the financial products and access to market opportunities to enable viable and sustainable entrepreneurship projects among Roma.

The EC has number of mainstream employment initiatives that could also include young Roma. Jean-Claude Juncker’s EC presidency has put a strong emphasis on ‘jobs, growth, fairness and democratic change’ which has led to more youth employment initiatives. However, these measures do not reach young Roma. One major issue is the lack of an ‘explicit but not exclusive’ approach for this policy, which leads to a mismatch between the needs of Roma and the opportunities the services offer.⁶²

Housing

Housing is the third policy area of the Framework, which has also failed to advance. The Framework’s goal was ambitious: “Close the gap between the share of Roma with access to housing and to public utilities (such as water, electricity, and gas) and that of the rest of the population”. The Evaluation stresses that short-term action on housing is insufficient and there is a lack of long-term programmes. Furthermore, findings of the 2018 FRA report⁶³ confirm that discrimination and segregation persist, as one third of the Roma surveyed continue to live in housing with no running water; 38% do not have a toilet, shower or bathroom inside their home. Yet access to basic sanitation is an essential part of living a decent existence, according to Article 34 (3) of the EU Charter of Fundamental Rights.

Similarly, census data in Hungary suggest that 3% of the total Roma population inhabits 1,380 segregated settlements, and hundreds of such dwellings are situated in remote areas lacking basic infrastructure and public transport connections. Similarly, Slovakian municipalities buy cheap houses in remote areas for Roma residents, so as to “export” them from urban centres. In addition, forced evictions are still occurring in many member states: indeed, the monitoring reports⁶⁴ confirm that in Bulgaria, the Czech Republic, France, Ireland, Italy, Romania and Slovakia, local authorities still favour demolitions and mass evictions, without providing adequate alternative accommodation for those evicted and regardless of domestic and international law.

60 <http://kiutprogram.hu/wp-content/uploads/2018/07/way-out-modell-bratislava-conference-eng.pdf>

61 <https://www.redi-ngo.eu/support-services/>

62 <http://ergonetwork.org/employment/>

63 See FRA Report 2018, *A persisting concern: anti-Gypsyism as a barrier to Roma inclusion* <https://fra.europa.eu/en/publication/2018/roma-inclusion>

64 Roma civil monitor pilot project, *A synthesis of civil society’s reports on the implementation of national Roma integration strategies in the European Union*

Despite official complaints by CSOs to the EC following years of evidence, and requests to launch infringement proceedings against countries like Italy and Bulgaria, the EC has turned a blind eye to discrimination against the Roma population in the area of housing. While this contravenes the EU's anti-discrimination legislation, political games seem to prevent action. For instance, it seems that the EC did not launch infringement proceedings against Italy for discriminating against its Roma population because high level EC politicians wanted more leverage in its negotiations on migration, which were deemed a higher priority.

Health

Although the Evaluation points to progress in the self-declared health of Roma, it stresses that health insurance coverage has not increased. Therefore, the Framework's goal - to "*reduce the gap in health status between the Roma and the rest of the population*" - has not been met.

Despite the Framework's targeted intervention requests to member states, health outcomes among Roma remain one of the main public health challenges in the EU. Progress in reducing avoidable and unnecessary health inequalities endured by Roma has been limited, and they continue to die young.⁶⁵ Equally important, decimated by chronic but preventable diseases, their life expectancy

and health status remain significantly lower than for non-Roma in all European countries.⁶⁶ Despite this alarming situation, Roma continue to face many barriers and inequities in gaining access to quality health care, including a lack of health insurance, preventive programmes such as childhood vaccinations, and sexual health and reproductive health services.

Moreover, many Roma are too often diagnosed during the final stages of an illness because health services were unavailable, treatment was late and not systematic, and preventative programmes and examinations were lacking. According to FRA, the health insurance coverage of Roma has generally declined in the region.⁶⁷ The EC Evaluation reported a significantly worse subjective experience with healthcare providers for Roma than non-Roma.⁶⁸ This is due to the quality of healthcare Roma receive, which is often compromised due to ethnic prejudices on the part of medical professionals.

Furthermore, the evidence on Roma health remains anecdotal and its representativeness limited because member states refuse to collect ethnically disaggregated data in public health and healthcare provision,⁶⁹ despite the EC and UN's recommendations to do so⁷⁰. That is why, CSOs have to rely on socio-economic and social exclusion proxies.

65 EPHA, *Health and Early Childhood Development in Roma Communities | An Analysis of European Union and National Policy Commitments*, October 2017, available at: <https://epha.org/ephas-response-to-eu-evaluation-of-the-national-roma-integration-strategies/>; FRA, *A Persisting Concern: anti-Gypsyism as a barrier to Roma inclusion*, 2018, UNDP, *The Health Situation of Roma Communities: Analysis of the Data from UNDP, WB, and EC Regional Roma Survey*, 2012; EC and Matrix, *Health status of the Roma population. Data collection in the Member States of the European Union*, available at: http://ec.europa.eu/health/social_determinants/docs/2014_roma_health_report_en.pdf;

66 EPHA, *Closing the Life Expectancy Gap of Roma in Europe*, 2018, available at: <https://epha.org/wp-content/uploads/2018/10/closing-the-life-expectancy-gap-of-roma-in-europe.pdf>; Šprocha, B., *Reproduction of Roma Population in Slovakia and Prognosis of their population development* (in Slovak), 2014, Bratislava: Slovak Academy of Science.

67 FRA, *A Persisting Concern*, p. 41.

68 FRA, *A Persisting Concern*, pp. 39-40.

69 ERRC, *Hidden Health Crisis*, 2013, available at: <http://www.errc.org/article/hidden-health-crisis-health-inequalities-and-disaggregated-data/4214>.

70 European Commission, *Data Collection in the Field of Ethnicity*, 2017, available at: https://ec.europa.eu/newsroom/just/item-detail.cfm?item_id=112035; OHCHR, *A Human Rights-Based Approach to Data*, 2018, available at: <https://www.ohchr.org/Documents/Issues/HRIndicators/GuidanceNoteonApproachtoData.pdf>

In the past decade, a wealth of evidence from child development and neuroscience studies has pointed to the first 1,000 days of a child's life as pivotal to their later success in life. More than seven years after the adoption of the Framework, Roma children continue to live in conditions that violate their fundamental rights. According to the 2017 EU-MIDIS II, every third Roma child was living in a household in which at least one person had faced hunger at least once in the preceding month.⁷¹ The situation is even more alarming when we consider that close to half of the Roma population are children and adolescents (3.5 million - 46% - of an estimated total of 7.7 million, according to UNICEF).

Likewise, infant mortality remains disproportionately high among Roma. For example, in Slovakia it is 2-2.5-times higher than the national average. Two in every hundred Roma infants die within the first year of life. This reverse pattern of infant mortality among Roma implies that it is not the different quality of reproductive and maternal healthcare (although media and civil society recently reported many incidents of discriminatory treatment of Romani mothers⁷² - which is determining the mortality rate), but the quality of the living environment into which these Romani children are born.

The human right to water and sanitation requires that these services are available, accessible, safe, acceptable and affordable for all. Moreover, sanitary services should provide individuals with sufficient privacy and dignity. Another factor which affects Roma health is the poor quality of urban space and public infrastructure in their neighborhoods (more details of these problems, please see the Annex).

Roma arts, culture and history

The Roma represent the biggest ethnic minority in Europe. Their history and culture are an inseparable part of European and national cultural landscapes. Yet Roma cultural heritage is rarely acknowledged and included in the collective European narrative. For instance, arts, culture and history are completely left out of the current EU Roma Framework, and therefore also from the Commission's Evaluation. The only reference in the Evaluation is a recommendation to make 'Roma culture and history part of the education curriculum' but it lacks analysis and elaboration.

This leads to cultural impoverishment and loss. Roma lack spaces and resources to conserve, document, develop and disseminate the diverse manifestations and artefacts of Roma culture. This is particularly striking in the field of language (Romanes): as fewer Roma children learn it (it is not taught at school), there are limited possibilities for publishing in Romanes or using the language in the media. In addition, due to the dominant discourse on Roma - shaped by the media - which is generally negative, stereotypical and biased, Roma are not included into national cultural narratives, and are consequently absent from permanent national collections in the national archives or national museums. Likewise, Roma history and culture are not included in history books. The centuries of Roma contributions, achievements and cultural productions are not properly researched, documented, and presented. That is why, following a comprehensive mapping conducted by ERIAC on Roma cultural heritage, it is estimated that there are approximately 10,000 artefacts of Roma culture kept in the basements and storerooms of ethnographic museums, but only two on permanent display in Europe.

71 FRA, *Second European Union Minorities and Discrimination Survey, 2017*, available at: <https://fra.europa.eu/en/publication/2017/eumidis-ii-main-results>.

72 ERRC, http://www.errc.org/reports--submissions/cause-of-action-reproductive-rights-of-romani-women-in-ukraine?fbclid=IwAR0YHJLg6RiRWfxOUj_X1jswtTOiesf_t0QVkyPvwPXyp-p0nnp7eqEOvc; ERRC, http://www.errc.org/uploads/upload_en/file/coercive-and-cruel-28-november-2016.pdf, Counselling Centre for Civic and Human Rights (Poradna), <https://www.poradna-prava.sk/en/documents/vakeras-zorales-speaking-out-roma-womens-experiences-in-reproductive-health-care-in-slovakia/>, or AF article <https://www.apnews.com/a3e7b6cbd5a54edf83eac4720ec49597?fbclid=IwAR0Z4EWLyHln8yRJqv0-TGIMSWcdPzeeScoldISMgMiVE-oB-RuRd9g-z4>.

Without policies and institutions, Roma art and culture are being appropriated by majority societies without a proper recognition of their Roma producers. There are no state-level or European level policies to counter this unjust process of cultural appropriation. At the same time, Roma cultures are theorised into the outdated concept of “low culture”. The European public enjoy the privilege of viewing a selection of Roma masterpieces, which are held in public collections in several European member states. In addition, many public collections, archives, museums and national cultural institutions have funding to acquire Roma artworks, but since these do not form an integral part of the institutional narratives, they do not appear in permanent exhibitions. As a results, they remain hidden, unknown and inaccessible to the next generation of Roma. This, Roma cultural histories and heritage are still invisible and unwritten, and the question of Roma access to Roma cultural heritage remains unaddressed.

Some aspects related to the field of Roma arts, culture and history fall under the framework of minority rights (as regulated, for example, by the Council of Europe Framework Convention for the Protection of National Minorities). However, not all EU member states recognise the Roma as a national and/or ethnic minority. In these countries in particular – for example France - Roma lack legal tools and measures to protect and promote Roma arts and culture. In those countries where Roma do enjoy the status of a legally recognised ethnic minority, the application of the Framework Convention is often superficial or incomplete, and is unequal across the EU. In these countries, Roma stand in competition with other citizens for public funding in the fields of arts and culture.

At the EU level, not enough is being done to mitigate the uneven activity (if any) taking place in this field by member states. For example, the 2018 European

Year of Cultural Heritage was not inclusive of Roma – Roma projects only took place under the “heritage year”. Moreover, Roma stand in competition with better-prepared and better-educated major cultural producers for arts and cultural funding; some programmes under the MEDIA programme have requirements that are not met by any Roma led-institution, company or initiative currently in existence. Furthermore, as national funds for arts and culture rarely foster cross-country collaboration, the Roma lack resources to reinforce their European identity, especially in the context of the relatively high historical and contemporary mobility of Roma EU citizens across Europe.

In conclusion, given these disadvantages, Roma arts and culture remain greatly under-represented, both at the EU level and nationally. This has important consequences. The dominant discourse and imagery associated with Roma is negative and stereotypical. More balanced narratives, representations and positive examples in public spaces, which have the potential to challenge antigypsyism are lacking. At the same time, in the arts, being Roma tends to be an asset and Roma culture is valued more positively. That is why, it is important to emphasise that the EC could through the language of culture educate the societies about Roma belonging, contribution and achievements in the context of national and European culture.

Governance

Governance is the cornerstone of every effective institution or organisation.⁷³ Without good governance the system, processes, measures, objectives and all the other relevant elements⁷⁴ of an initiative like the EU Roma Framework are doomed to fail. Although the Framework has boosted the number of instruments and initiatives which fall under this area, barriers still exist.

73 <https://eur-lex.europa.eu/summary/glossary/governance.html>

74 https://www.governancetoday.com/GT/Material/Governance_what_is_it_and_why_is_it_important.aspx?WebsiteKey=0cf4306a-f91b-45d7-9ced-a97b5d6f6966

EU funding

Overall, EU funds have been spent on Roma inclusion without clear targets, indicators and clear monitoring. The Roma population and the Roma CSOs have not been involved in the design and implementation of EU funds and related projects. EU funds have failed to improve the lives of Roma because of these five main elements:

1. lack of Roma participation
2. weak governance and coordination
3. lack of data on Roma
4. lack of robust monitoring of the spent funds and
5. lack of an antigypsyism approach.

In addition, the failure of the funds is due to the EU's weak monitoring system and the inefficiency of the tools it can deploy to pressure member states when they do not fulfil their commitments - whether they were obligatory or not. Furthermore, the ECA⁷⁵ confirmed that the current EU funding instruments addressing the socio-economic challenges of Roma fail to address antigypsyism as a specific phenomenon. The ECA makes it clear that although the EU-level financial framework makes it possible to address all these goals, member states lack integrated, multi-fund programmes (i.e. combining the ERDF and the ESF) to address shortcomings in housing conditions, employment, education and healthcare as integrated projects. In addition, the efficient use of funds has also been challenged by inadequate and ineffective targeting. Similarly, EU policies were not linked with funding, which had an impact on the implementation of national policies. Moreover, the lack of inclusion policies, effective legislation and sufficient resources, as well as rising discrimination, have played a crucial role in blocking concrete ideas for solutions.

Participation and empowerment of Roma

Participation and empowerment of Roma is an aspect highlighted both in the Evaluation and by civil society organisations. Although the Framework has created fora known as “Roma Platforms” (EU and national) - which undoubtedly contribute to fostering active participation by Roma in EU and national policy, Roma communities are highly underrepresented. “Lack of Roma ownership” is an element remarked upon by the LIBE study,⁷⁶ and is caused by their limited participation in the design, implementation and monitoring of the NRIS. Furthermore, CSOs⁷⁷ argue that Roma rarely obtain decision-making positions or full managerial power. However, they have succeeded in climbing the ladder from complete non-participation to the level of tokenism. This tokenism allows them to listen and have a voice, but without exerting influence.

Data, monitoring and evaluation

The quality and effectiveness of the EU Roma Framework's monitoring and evaluation systems represent the main issue. In particular, reliable data on Roma, including equality data indicators⁷⁸, i.e. disaggregated by ethnicity, is lacking and this affects the overall policy design and the ability to measure the impact of EU funds, as also raised earlier. Furthermore, programmes - even those specifically targeting Roma - do not include Roma integration indicators, and it is therefore not possible to measure progress. As the ECA - referring to the ESF regulation annex - pointed out, a number of standardised indicators which are relevant to Roma integration programmes do exist⁷⁹, but should be accompanied by relevant programme-specific indicators as well.

As the Open Society Foundations reports and the EC acknowledges, the collection of precise data on inequality is an essential element in identifying

75 https://www.eca.europa.eu/Lists/ECADocuments/SR16_14/SR_ROMA_EN.pdf

76 [http://www.europarl.europa.eu/RegData/etudes/STUD/2019/608859/IPOL_STU\(2019\)608859_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/STUD/2019/608859/IPOL_STU(2019)608859_EN.pdf)

77 ERGO Network, 2019, *Degrees of Roma participation* (unpublished paper)

78 https://ec.europa.eu/newsroom/just/document.cfm?action=display&doc_id=43205

79 See https://www.eca.europa.eu/Lists/ECADocuments/SR16_14/SR_ROMA_EN.pdf

gaps in public policies, and implementing remedial steps. Lack of data masks inequalities and hinders the exposure and monitoring of these gaps by civil society, while government assertions about how well they are doing in closing the gaps cannot be verified. In addition, shadow reporting is another missed opportunity, due to the lack of transparency and access to data on the national level.

Research points out that data can be collected. The Roma Civil Monitor reports that in 2014 the EU-SILC survey included questions on ethnic identity, generating a good ratio of data on Roma among the total population, and this example showed that the collection of ethnically disaggregated data is not resisted by Roma. Similarly, the Italian Institute of Statistics (ISTAT) set up a Roma/Sinti/*Caminanti* National Statistical Table. Ministries and Roma representatives crafted a conceptual framework identifying indicators and monitoring and evaluating the outcomes of inclusion policies. Such, data collection should be voluntary and anonymous, based on self-identification, with a clear explanation on how the data will be used, based on people's consent, and allow for multiple or intersecting identities.

Mainstream v targeted approach to policy-making

In the ten common basic principles on Roma inclusion established in 2010, it is clearly stated that Roma-focused initiatives should not exclude Roma from being part of mainstream policies⁸⁰. Nevertheless, the Evaluations show that mainstream national policies do not sufficiently target the Roma population, especially in the areas of housing, employment, health, youth and gender. The Roma population needs both approaches: mainstream as well as targeted.

The EU Roma Framework for NRIS is a targeted approach by its self. There are also number of EU funded projects that directly target Roma such as ROMACT, mentioned earlier, but this is not sufficient to cover all the issues. That is why there is a need for more mainstream approach, along with the direct targeting of Roma. For instance, the EC has number of mainstream initiatives, which Roma could benefit from.

One of the most important initiatives, which aimed to reach those most deprived and furthest from the labour market, was the European Youth Guarantee. The Youth Guarantee is a commitment by all member states to ensure that all young people under the age of 25 receive a good quality offer of employment, continued education, apprenticeship or traineeship within four months of becoming unemployed or leaving formal education.⁸¹ However, the European Parliament's assessment of its implementation in 2017⁸² revealed that the programme did not reach vulnerable groups, and more specifically did not manage to improve the situation of Roma youth.

The European Pillar of Social Rights (ESPR)⁸³ is another mainstream policy, which monitors to what extent social rights at EU and national level are implemented. Each of the 20 principles of the Pillar is relevant for Roma communities (e.g. unemployment benefits, employment conditions, healthcare, childcare, gender equality) but Roma are also not there.

Under the European Semester, since 2012 the EC has proposed annual Country Specific Recommendations (CSRs) to member states, which are adopted by the Council. A good practice from this initiative is that CSRs are also submitted concretely on Roma issues. However, the EC has been submitting very similar

80 https://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/lisa/108377.pdf

81 Council of the European Union (2013), *Council Recommendation on establishing a Youth Guarantee* (2013/C 120/01), 22 April 2013.

82 http://www.europarl.europa.eu/doceo/document/TA-8-2018-0018_EN.html?redirect

83 https://ec.europa.eu/commission/priorities/deeper-and-fairer-economic-and-monetary-union/european-pillar-social-rights/european-pillar-social-rights-20-principles_en

CSRs every year concerning Roma. This proves more should be done in terms of investment and commitment among national governments regarding Roma. Therefore, the EC should improve the use of CSRs as an effective tool for the EC to directly influence member states.

Heterogeneity of Roma

The EU Roma Framework fails to include and target specific groups such as women, youth, children, disabled people and the elderly. The Evaluation further states that the needs of women and youth were not addressed by policy measures in areas such as employment⁸⁴. It also concluded that Roma migrants, LGBT and Muslim Roma are not included in the EU Roma Framework and its NRIS. While most of the policy measures focus on a generic Roma identity, the same measures omit multiple forms of discrimination. Furthermore, it does not recognize the fact that there are three categories of groups among the Roma: 1) Roma nationals in EU countries with large Roma minorities, 2) Roma nationals in other EU countries and 3) Intra-EU Roma migrants,⁸⁵ which currently are out of any EU or governments available Roma related strategies or measures.

It is therefore very important that an intersectional lens is applied to NRIS, and exclusion is measured and addressed through intersectional policies that benefit Roma who face multiple forms of discrimination. Analysing how policies have affected or may affect various groups would allow the EU to assess whether they lead to inclusion or risk perpetrating further exclusion. Specifically, policy measures found in NRIS should reflect and be directly linked to Roma-centred policy measures

within the sectorial strategies on youth, gender equality, and disability inclusion. Furthermore, acknowledging that the three different categories of groups among Roma – as mentioned above - exist is also important to recognize their heterogeneity in the EU, so to better include each group.

Enlargement

After the Roma Decade, the EU Roma Framework and the “Roma Integration 2020” have ensured that Roma remain a political priority in the enlargement countries. Inter-ministerial bodies regularly meet to discuss progress, governments provide annual self-reports on the implementation on NRIS⁸⁶, and priority areas are identified and followed up through Roma Seminars, conducted by the EC. In addition, there were new policies such as data collection by state statistical offices, and budget indicators intended to show how much public spending was earmarked for Roma. Continuous training and technical assistance is provided by the Belgrade-based Roma Action Team.

Despite this, Roma continue to be the most marginalised and deprived community in the region. A 2017 regional Roma survey showed that the accession process does not guarantee that Roma will not be left behind. For example, the situation of Roma in Montenegro has worsened since 2011, although the country is at the most advanced stage of accession. This is mostly as a result of mainstream reforms and public investments that do not reach Roma. Lastly, while the EU Roma Framework specifically targeted the enlargement region, it did not allow the enlargement countries to participate in the institutional set-up of the framework.

84 https://ec.europa.eu/info/sites/info/files/swd_2018_480_1.pdf

85 <https://www.opensocietyfoundations.org/sites/default/files/revisiting-eu-roma-framework-20170607.pdf>

86 <https://www.rcc.int/romaintegration2020>

THE WAY FORWARD TO THE POST-2020 EU ROMA STRATEGY

Building on the achievements and the persistent challenges identified above, this chapter emphasises the key elements currently missing in the EU Roma Framework which need to be included in the next post-2020 Roma Strategy (this name will be used mainly when we refer to the future Roma framework). Nevertheless, it is important to note that this paper cannot provide a prescription for success in all the areas that affect Roma. If the next EU Roma Strategy aims to achieve full Roma inclusion, it needs to provide holistic and integrated responses in all relevant fields - not just the ones we list below, but also in equality in the field of citizenship and political rights, access to justice and equality before the law, transport, digital connectivity, access to basic sanitation, hate speech and hate crime. Furthermore, processes such as trust-building between Roma and governments are a prerequisite for any policy, fund or legislation that aims to make a positive impact on the lives of Roma.

NON-BINDING CHARACTER OF THE FRAMEWORK: UPGRADING ITS STATUS

The next EU Roma Framework needs to change. It should no longer be a soft policy instrument, but needs to be a binding strategy or initiative with concrete measurable objectives (e.g. using the model

of the Western Balkans declaration to be signed approved on 5th July, 2019 in Poznan). The EC should consider using more assertive language, making adoption of the NRIS mandatory and centralising ownership of its implementation in order to hold member states accountable. In particular the EC could track governments' responsibilities to ensure that they are reflected either in the CSRs or used to pursue infringement procedures if appropriate.

ADDRESSING ANTIGYPSYISM

The next EU Roma Framework must demand that all member states formally acknowledge and recognise the concept of antigypsyism. Governments need to concede that fighting discrimination is not sufficient when they have failed to recognise the widespread antigypsyism in European societies. The next Commission document needs to ask member states to include mechanisms to prevent antigypsyism in their national legal framework and include them as a horizontal issue in the NRIS, as CSOs have already recommended⁸⁷.

Combating antigypsyism through the existing anti-discrimination legislation is not enough. The four key areas of NRIS – education, employment, housing and healthcare, accompanied by other relevant areas mentioned above – should include a clear reference to antigypsyism. Concrete measures to combat all

87 See *Revisiting the EU Roma Framework: assessing the European Dimension of the Post 2020 Future*, published by OSEPI 2017 <https://www.opensocietyfoundations.org/reports/revisiting-eu-roma-framework-assessing-european-dimension-post-2020-future>

the dimensions and manifestations of antigypsyism must be developed, including measures to prevent and combat hate crime and hate speech, especially online.

The fight against antigypsyism cannot only be reactive. It needs to be preventive and pro-active, focused on providing a positive counter-narrative about the Roma, educating the majority and raising awareness about the existence of antigypsyism as a specific form of racism against Sinti and Roma. If people became aware of this prejudice in the same way they acknowledge the existence of anti-Semitism, the future EU Roma Framework could make a real difference for Roma.

FOUR POLICY AREAS: EDUCATION, EMPLOYMENT, HOUSING AND HEALTH

Each of these areas has a specific goal, which we have already analysed. The sections below recommend how each goal should change, as well as including key recommendations for the text of the future Roma Strategy.

Education

New goal: *Ensure equitable access to quality education to all Roma children and increase the enrolment and completion rate of Roma in quality integrated primary education to 90%, and in secondary education to 50%.*

Current goal: *“Ensure that all Roma children complete, as a minimum, quality primary school education”.*

It is clear that the next EU Roma Framework needs to put in place a clearer and more targeted educational goal. Quality education and inclusive measures should be at the forefront of every education initiative, which targets Roma pupils. The next Framework needs to send a strong message to

member states that conducting IQ tests on Roma children – which are based on knowledge of the dominant culture - should no longer continue. Likewise, addressing Early School Leaving and early childhood education and care should be emphasised in every national Roma strategy.

Antigypsyism is a phenomenon that affects all Roma, but children most acutely. This is why anti-bullying measures and anti-Roma bias among teachers must be addressed within schools legislation and accompanied by teacher training. Furthermore, the EU Roma Framework could ask member states to adopt inclusive education measures – these would include desegregation, teacher awareness and narrative change work on Roma across the educational system and stress the importance of Roma history and culture in the school curricula. The EC could also prepare case studies of positive practices based on EU funded projects (e.g. Council of Europe’s project called Inclusive Schools for Roma⁸⁸) and share them with CSOs and governments.

Employment

New goal: *Increase the Roma employment rate in the public sector to the rate equivalent to the proportion of Roma in the overall population: 75% of the Roma population aged 20 to 64 should be in work.*

Current goal: *“Cut the employment gap between Roma and the rest of the population.”*

This is a realistic and concrete goal, and could be achieved if the next EU Roma Strategy compels every member state to act and offers support for income generation efforts at a local level. The EC could ask each member state to promote skills training specifically for the Roma population and thus encourage employment in both the private and public sectors, access to finance and guarantees to promote self-employment and special measures from which Roma-owned businesses could benefit, such as tax incentives. Investment in infrastructure and public

88 <https://pip-eu.coe.int/en/web/inclusive-education-for-roma-children>

services, such as childcare and healthcare, should be promoted so as to stimulate local employment that can benefit Roma⁸⁹. The EC could promote public employment schemes as a temporary solution for unemployment, but they should also be used as an opportunity for re-qualification and further training. The future Roma Strategy could encourage member states to provide access to finance for Roma entrepreneurs by giving them technical assistance, adapted financial products and access to market opportunities. This will enable viable and sustainable entrepreneurship projects among the Roma and significantly boost Roma employment.

Housing

New goal: *Provided that quality housing occurs, legalise those informal settlements where Roma live; alternatively, provide permanent, decent, affordable and desegregated housing for Roma currently living in informal settlements that cannot be legalized for justified reasons.*

Current goal: *“Close the gap between the share of Roma with access to housing and to public utilities (such as water, electricity, and gas) and that of the rest of the population”.*

Following the earlier analysis, it was shown that housing is another policy area where there is no progress. The existing goal could be replaced with the one on top, which is tangible and answers exactly what Roma need the most. The EC could advance on this new goal by using all its available EU legal, policy and funding instruments and asks in the future Roma strategy, that member states do the same. In addition, it could also ensure targeted funding for addressing Roma housing exclusion from a dedicated single fund, which tackles extreme poverty or ensure substantial resources are made specifically available in national programming for inclusive housing projects accessible for Roma, in the framework of multi-fund programmes combining the ERDF and

ESF.

In line with previous EU achievements, the future Roma Strategy should further strengthen desegregation and tackle segregated living conditions in accordance with the diversity and complexity of Roma housing challenges in Europe, taking into account the specific situation of individual families. It is important to note that future EU funds should focus on quality housing and better living conditions for Roma in comparison to take a single approach of non-segregation at any cost.

Health

New goal: *Ensure universal health insurance coverage among Roma, at least 95%, and reduce the disproportionate exposure of Roma to public health and environmental harms.*

Current goal: *“Reduce the gap in health status between the Roma and the rest of the population.”*

The health consequences of an inadequate living environment for Roma were highlighted at the last European Platform⁹⁰ for Roma Inclusion in October 2018. Given that the health goal has failed, we suggest a more concrete alternative. The EC could insert key recommendations from the Platform’s health stakeholders into its agenda. For example, the future Roma Strategy should urge member states to adopt an integrated approach, which tackles the challenges in Roma health outcomes in an intersectional manner. The EC could emphasise preventative health policies tailored for specific age and gender groups, with particular attention paid to early childhood development and Roma women and girls. Similarly, the EC could propose that member states put in place comprehensible health policies tackling a variety of social determinants of health (i.e. access to public infrastructure and utilities, access to justice, adequate housing, and education).

89 O’Higgins, N. (2012). The UNDP survey covered the FRA Roma survey countries: Bulgaria, the Czech Republic, Hungary, Romania and Slovakia.

90 https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-and-eu/european-platform-roma-inclusion/european-platform-roma-inclusion-2018_en

ROMA ARTS, CULTURE AND HISTORY

Roma arts and culture are absent from the current EU Roma Framework, and it is vital that the EC does not let Roma cultural heritage in Europe gradually disappear. The next EU Roma Strategy should include Roma arts, culture and history as one area of engagement, and set out all the available policies, funds and other instruments that can address this topic. This can also play a significant role in fighting antigypsyism.

Arts and culture should not just be seen as valuable in and of themselves, but as a complementary strategy that maximises the success of other priority areas. By including Roma arts, culture and history in the future Roma strategy, the EC will send a message to member states that European and national cultural narratives should highlight Roma belonging, contributions and achievements. This could be reflected in school curricula, the media and major arts and culture institutions.

GOVERNANCE

The Evaluation found that governance mechanisms at the EU and national level are in place, but it highlighted that the Framework does not involve key sectors and stakeholders in a consistent way. It is therefore important for the EC to become a more relevant actor in policy coordination, building on the open method of coordination that already exists in the EU.⁹¹ Furthermore, the EC should encourage the establishment of a multi-stakeholder Roma-led network, with a stronger formal coordination role and a mutual learning mandate. In addition, it could aim to promote cooperation with national, local and regional authorities, civil society organisations and other EU level networks in connected policy areas on Roma integration. At the same time, the EC could do more coordination within member states on the national level, as the Evaluation identified this as

particularly lacking. NRIS can set a clear mandate to establish the empowered bodies for social inclusion of Roma, as the cases of Hungary and Slovakia prove.⁹²

The chapter on achievements lists a number of very good practices that the EC could scale up at different institutional and national levels and continue to develop - the Council Initiatives, EP resolutions, EU Roma week, SCOs, ECA, FRA reports, funding policy advancements, and raising antigypsyism. Without good governance, the EU Roma Framework is doomed to fail. That is why it is essential that the sub-chapters below become part of the future EU Roma strategy.

EU funding

The analysis in this paper shows that EU funding has not made an impact on the lives of Roma. The new Roma Strategy can address this by including a chapter on EU funding which focuses on ensuring the following five elements in the planning and design of funds that target Roma: 1) ensuring Roma participation, 2) collecting data on Roma, 3) strengthening governance and coordination, 4) planning robust monitoring of funds spent and 5) including the antigypsyism approach. Additionally, the EC could strengthen these aspects by making EU funds for Roma issues conditional on clear targets, indicators, clear monitoring and the involvement of Roma in decision-making.

Moreover, in order to strengthen NRIS as well as empower and build capacity for Roma civil society, national authorities and National Roma Contact Points (NRCP), the next EU Roma strategy could assign specific EU funds for the implementation of the NRIS. For this to happen, the next MFF should have a direct connection to the policy priorities of the future EU Roma Strategy. A targeted approach to funding is needed - i.e. more and smarter investment strategies - where civil society is given more space

91 See COM(2001) 710 final, *On the common asylum policy, introducing an open coordination method*

92 See Roma Civil Monitor, *A synthesis of civil society's reports on the implementation of national Roma integration strategies in the European Union: Focusing on structural and horizontal preconditions for a successful implementation*

to obtain direct (non-government mediated) funding. This could be included within the new MFF period, mainly via funding allocated to the NRIS implementation. DG NEAR has already set an example of how specific funds can be allocated directly for Roma projects in the Roma Integration⁹³ 2020 project.

Participation and empowerment of Roma population

Roma participation and empowerment should have its own space in the next EU Roma Strategy. The study shows that this area is highly problematic and is missing from the key components in the current EU Roma Framework. The EC could ensure that in the next EU Roma strategy member states are deliberately asked to strengthen Roma participation and empowerment in their NRIS, by involving CSOs in the policy process as well as involving Roma experts and officials in governmental structures, especially the ones dealing with Roma inclusion.⁹⁴ This should happen at all levels - local, regional, national and European.

To do so, the EC needs to improve the consultation processes that have already started and become an example for member states. It should focus particularly on the two existing participation mechanisms, namely strengthening the dialogue and decisions in the EU Roma Platforms and in the Consultation meetings in Brussels with CSOs. Moreover, the EC should encourage direct participation of Roma civil society in the policy process through an open method of coordination – in order to strengthen participation through consultation - while also taking into account external and independent evaluations and reporting by Roma CSOs. This would also make a valuable contribution to target setting, data collection and monitoring

systems. A positive example of participation in the policy process is the case of Portugal, where the Consulting Group for Roma Communities Integration is made up of the representatives of seven line ministries, the Regional Governments of Madeira and Azores, Municipalities and Civil Parishes, civil society organisations and Roma associations, research institutions and experts⁹⁵.

Data, monitoring and evaluation

The lack of reliable data on Roma is a major flaw in the overall policy design of the EU Roma Framework and the National Roma Strategies. This has a big impact on the monitoring and evaluation of the NRIS. However, the EC has a great opportunity to address it by ensuring that in the next EU Roma strategy equality data indicators, including data disaggregated by ethnicity are used as prerequisite for the implementation of NRIS by member states. Future NRIS need to have clear and measurable objectives and to set specific and disaggregated indicators on the Roma population. Qualitative data should be used to contextualise quantitative indicators and to ensure that Roma CSOs contribute to the reporting and external evaluation system of NRIS implementation. CSOs^{96,97} and EC reports provide enough examples of such data, is possible and the EC and governments need to explore them.

In the same way, transparency and accountability mechanisms need to be improved to make the monitoring and evaluation systems more reliable. The EC needs to ensure that access by CSOs at national level to the NRIS reports and EU funded, Roma-related projects. Access to information should be promoted and become a good practice. Without timely and transparent information flow, then monitoring, evaluation will continue to be a problem.

93 <https://www.rcc.int/romaintegration2020/pages/1/overview>

94 <https://cps.ceu.edu/roma-civil-monitor>

95 Ibid.

96 <https://www.opensocietyfoundations.org/reports/ethnic-origin-and-disability-data-collection-europe-measuring-inequality-combating>

97 <https://www.enar-eu.org/Equality-data-collection-151>

Mainstream v targeted approach to policy design

Both mainstream and targeted approaches are needed, but while the targeted approach is not working, the mainstream approach is completely absent from the EU Roma Framework. The EC has a major role to play in addressing this and ensuring that both approaches are an integral part of the next EU Roma Strategy. The EC should insist that member states mainstream Roma inclusion in all relevant policy areas. Similarly, the EC could provide targeted support for Roma in the most precarious situations by mainstreaming the priorities of EU Roma integration, non-discrimination and inclusion while encouraging member states to do the same. In this way, the mainstream approach to policies should complement one targeted to Roma. The EC could get an inspiration from the example from DG NEAR, which has already fully mainstreamed Roma integration into its enlargement policy.

Heterogeneity of Roma

The current EU Roma Framework fails to include specific groups among Roma, who are currently left out of European and national policy measures. That is why the next EU Roma strategy should include these groups in its measures: women, youth, children, Roma migrants, LGBT, Muslim Roma, disabled and the elderly. For instance, the EC could apply an intersectional lens to NRIS, and the intersections of exclusion should be measured and addressed through policies that benefit Roma who face multiple forms of discrimination and antigypsyism. The EC could ensure that the next EU Roma Strategy does not miss also these three groups: 1) Roma nationals in EU countries with large Roma minorities, 2) Roma nationals in other EU countries, 3) Intra-EU Roma migrants, and thus help governments to better design their Roma related policies and measures. Without this, the future strategy could miss entire groups of people just because they are not recognised in the national country Roma-specific policy as a targeted group.

ENLARGEMENT

Although considerable progress has been made regarding policies and funds in the Enlargement region, Roma continue to be the most marginalised and deprived community in these countries. This needs to be addressed in the next EU Roma strategy by ensuring that the Enlargement region remains a specific priority in the post-2020 EU Roma strategy. The EC should involve enlargement governments in the improved institutional set-up to monitor progress, discuss challenges and agree on priorities during implementation. Roma-specific targets should continue to be part of the opening and closing benchmarks in the relevant accession chapters. Roma Seminar conclusions should continue to be part of EU enlargement agenda including by monitoring implementation of conclusion in the relevant Subcommittee meetings.

The future Roma Strategy could require that Roma are a priority within the funding envelope for the region. Roma-specific indicators should be part of IPA III relevant thematic windows, and the EC and national governments should assess how each programme influences Roma and track investment, as with existing gender indicators. Furthermore, support for Roma-led civil society will be crucial to empower Roma and ensure independent assessment of progress, but also improve their involvement in policy definition, implementation and decision-making processes.

On the whole, governments need to scale up their efforts and ensure mainstream reforms also contribute to Roma inclusion. In this respect, the regional Declaration⁹⁸ currently being negotiated, which aims to set up regional targets in all four priority areas, is a first serious step forward. Inclusion of these targets as closing benchmarks for accession will be crucial to ensure Roma are not left behind.

98 NB: The Declaration is to be signed on 4 July 2019 at the Poznan Summit, organised within the "Berlin Process", with the presence of the European Commission and strong support of the Regional Cooperation Council. The Declaration sets out not only the objectives but also the basic principles necessary to achieve the targets set, including internal coordination, allocation of budget, monitoring and reporting, and participation of Roma.

KEY RECOMMENDATIONS

The recommendations listed below are key to ensuring an effective EU Roma Strategy post-2020 and are all addressed to the EC, member states and enlargement countries.

ANTIGYPSYISM

1. The post-2020 EU Roma Strategy and NRIS should be scaled up in a way that puts combating antigypsyism at their centre, so to encourage all member states to legally recognise this specific form of racism in their domestic law. EU institutions and national governments must officially recognise the existence of antigypsyism in all its manifestations and dimensions, including institutional varieties.
2. EU institutions and national governments should recognise the historical dimension of antigypsyism and how the historical responsibility of their institutions towards Romani communities.
3. EU institutions and national governments should assess, enhance and implement institutional and policy frameworks to fight antigypsyism as a special form of racism and the root cause of social exclusion.
4. EU institutions and national governments need to strengthen the research and monitoring of antigypsyism to investigate its causes, manifestations and effects in politics and society, with a focus on identifying cases and collecting equality data that could clearly provide information about the progress of the policy measures implemented in different fields.
5. EU institutions and national governments must counter and sanction hate speech in public discourses, including in the media, academia, among politicians, state authorities and civil servants. In particular, they should foster counter-narratives and ensure the meaningful participation of Roma in supervisory structures.
6. National governments should apply all available legal and political tools and improve and secure that all crime that raises a prima facie suspicion of a racially motivated nature are promptly investigated and prosecuted; additionally, Roma communities threatened by radical right groups should receive special protection, even if no hate crime occurs.
7. EU institutions and national governments should address and end any form of structural antigypsyism, including all forms of segregation, forced evictions, environmental injustice and other manifestations of prejudice, including in education, employment, health and housing.
8. Drawing on the mainstreaming approach applied to immigrant integration policies⁹⁹, a similar strategy need to be undertaken by the EC and governments in regard to Roma inclusion, in order to address multiple and intersectional discrimination (to protect EU mobile Roma, migrant Roma, Roma women, children and youth, Roma LGBT+, Roma with disabilities, elderly persons).

99 See Action Plan on the integration of third country nationals

9. The EC and governments should have clear, measurable objectives in improving access to justice, and the fight against discrimination, antigypsyist speech and crime should be included in the post-2020 Framework and NRIS as well as in EU policy tools such as: the Framework Decision on combating racism and xenophobia by means of criminal law, the Race Equality Directive and the Country Specific Recommendation used in the frame of the European Semester.
10. The EC and governments should improve the enforcement of anti-discrimination legislation and policies aiming at fostering equal treatment of Roma. Roma are particularly affected by the lack of effective infringement procedures.
11. The EC and governments need to raise awareness about complaints of alleged ill-treatment by police officers, including complaints with a possible racial motive. These should be investigated by a fully autonomous body outside the structures of the Interior Ministry or the police. Victims or witnesses of police ill-treatment should be provided with protection against harassment and victimisation.

EDUCATION

1. Governments should invest in quality early childhood education and care in order to combat inequality and the exclusion of Roma children and their parents.
 2. The EC should propose to governments to use EU and national funds to put the needs of Roma children at the heart of formal childcare and pre-school settings by encouraging national reforms and long-term projects by member states.
 3. The EC should monitor the patterns and practices of school segregation more robustly in member states, with independent oversight to be undertaken as a matter of urgency by the competent local and national authorities.
- Authorities directly responsible for primary and secondary education should be helped to develop desegregation measures and strategies. Those who break the law on segregation should be sanctioned, and attention should be paid to education systems at regional as well as local levels.
4. The EC need to ask member states to map the existing segregation of disadvantaged pupils, and specifically Roma, in education systems at local/regional levels. It could also ask governments to provide analysis of the causes of segregation, and recommend to be a priority for each government to develop a desegregation strategy. Access to EU funds can be used as a condition. This desegregation strategy should include the regulation of admissions and defining socially-balanced school districts.
 5. The EC should highlight to member states that, in exceptional cases, if circumstances do not make it possible to close segregated primary schools, then very considerable investment in high quality education is necessary to compensate for pupils' disadvantages and enable them to continue in desegregated secondary education.
 6. The development of inclusive education and teacher training are conditions for an effective desegregation policy. Improvements can also prevent 'white flight'. The EC need to encourage governments to use ESIF and IPA resources to be invested primarily into sustainable structural changes, rather than the daily operation of the schools (such as to cover wages or purchases of equipment with a short-term depreciation period).
 7. The EC must ask governments to ensure that anti-bullying measures are included within schools legislation and accompanied by training.
 8. The EC should ask governments to monitor enforcement action taken by school inspectorates, and provide further powers to such authorities as needed.

EMPLOYMENT

1. The EC should encourage national public authorities to ensure that vocational training schemes targeting Roma reflect their specific situation, as well as the increased demands of the labour market in this sector. Employment of qualified Roma workers should carry tax incentives for the employer.
2. The EC and governments need to reform the European Youth Guarantee and the Youth Employment Initiative¹⁰⁰, giving particular attention to the most marginalised. This could include:
 - Better targeting of training programmes specifically for marginalised groups.
 - Specific training for Public Employment Services (PES) on how to reach out to and deal with marginalised groups.
 - A more flexible and accessible PES registration process that ensures that no young person falls through the ‘safety net’.
 - More partnerships with educational institutions and NGOs, who can more easily reach out to Roma and other marginalised groups than PES. This requires that the EC ensure a dedicated funding that will allow these partners to support the PES and convince young people to register with PES, or to establish direct contacts with employers and support the skills development of young people.
3. The EC needs to ensure that each funding programme allocates sufficient resources for outreach, since many Roma live in remote locations. Additionally, since the successor of the ESF and the EaSI is the integrated European Social Fund Plus (ESF+) 2021-2027, the EC could earmark at least 25% of ESF+ to be spent on Roma integration, with specific mechanisms activated if underspending is above 5% in countries where substantial number of Roma are present. But firstly, the EC should identify the barriers which currently hinder EU funds to reach the Roma.
4. The EC should encourage governments to strengthen measures supporting initial work experience or providing on-the-job training, using the full potential of the European Social Fund (ESF). It can promote the use of the Microfinance and Social Entrepreneurship axis of the EaSI programme and thereby target Roma explicitly to improve their access to microfinancing.
5. The EC and the governments must put in place concrete strategies to combat antigypsyism in the labour market, both from employers and employment agencies. The EC could encourage governments to use EU funds to initiate antigypsyism training for PES employees to raise their awareness and skills.
6. The EC need to put greater emphasis on youth in the EU Roma Framework 2020-2027, in particular on the transition from education to employment, and ensure that member states make youth employment a priority in their NRIS.
7. The EC and governments need to secure separate employment conditions for young Roma who face severe exclusion and discrimination on the labour market solely due to their ethnicity.

100 Youth employment-related recommendations form ERGO <http://ergonetwork.org/wp-content/uploads/2018/12/Employment-recommendations.pdf>

HOUSING

1. The EC should ensure targeted funding for addressing Roma housing exclusion from a dedicated single fund, which tackles extreme poverty. Alternatively, if such a fund will not be launched in the MFF, then the EU should encourage member states to ensure that substantial resources are made available in national programming for inclusive housing projects accessible to Roma, in the framework of multi-fund programmes combining the ERDF and ESF.
2. The EC should strengthen the use of existing funding such as the Fund for European Aid to the Most Deprived for more structural support to Roma, and consider using financial instruments and funds such as the Investment Plan for Europe, the Council of Europe Development Bank and the European Investment Bank to ensure that investments in housing for marginalised communities are included in the next MFF.
3. In line with previous EU achievements, the governments and the EC, should further strengthen desegregation, and tackle segregated living conditions in accordance with the diversity and complexity of Roma housing challenges in Europe, taking into account the situation of individual families. While investments should not boost new segregation practices, future EU funds should focus on quality housing and better living conditions for Roma.
4. The EC should condition member states to include Roma families in the decision-making, design and implementation of any housing projects, which target Roma. This can be a key condition applied by the EC for member states before approving any EU funds, which target Roma.
5. The EC should strengthen the role of *ex ante* conditionality by: 1) requiring that national programming is in compliance with the (updated) National Roma Strategies; 2) ensuring that national mainstream policies support (or at least do not hinder) the integration of Roma; and 3) developing effective monitoring and enforcement mechanisms of national and local Roma inclusion action plans.
6. The EC need to ask governments to develop local social housing policies driven by housing needs. Funds should not be invested in temporary accommodation or separate housing schemes for Roma and other inhabitants.
7. The EC must ask member states to ensure that residents of informal dwellings should be protected from eviction and the demolition of their homes, unless they are provided with alternative, standard housing in a desegregated setting with access to public services.
8. The EC should ensure that governments use forced evictions as a last resort. The prevention of forced evictions should be strengthened through services such as social counselling, debt management and mediation, and active detection of households or areas at higher risk. There should not be evictions without substitute standard, affordable housing in a desegregated setting with access to public service.
9. The EC could develop, together with member states and CSOs, an early warning system for potential victims of evictions and give them access to legal aid, either by public authorities or by NGOs with public financial support. The moratorium on evictions in winter should be respected and especially vulnerable people such as the elderly, the infirm and families with children should receive special protection.
10. The EC need to be aware or informed in advance before public authorities carry out mass evictions solely against Roma. There should be a clear strategy setting out social assistance for the evictees, with provision of substitute accommodation or housing; the consequences of evictions for further social inclusion should be considered.

HEALTH

1. By adopting an integrated and intersectional approach, the EC could encourage governments to grant access to preventative health measures for all Roma, in particular women, children, older people and people with disabilities. Special attention shall be paid to those living in severely deprived housing conditions, where access to sanitation, waste removal and clean water is limited or lacking.
2. The EC should ask governments to adopt laws explicitly recognising the human right to water and sanitation and ensure that all people in the country enjoy access to safe drinking water and sanitation; ensure that informal housing conditions do not prevent people from enjoying the right to safe drinking water and sanitation; adopt policies and allocate budgets for connecting Roma settlements to public drinking water and sewerage systems; and ensure that adequate safe drinking water and sanitation facilities are available in Roma neighbourhoods and settlements.
3. The EC need to ensure that Union law is brought in line with the UN legal framework, and recognises the human right to water; propose expanding the applicability of water-related directives to include problems with accessibility and affordability of water supply and services; develop indicators and monitoring mechanisms on social equity in access to water and sanitation in member states and task the FRA with conducting annual data collection, in accordance with Article 4(1)(c) and/or (d) of Regulation 168/2007; and earmark funds to tackle limited access to water and sanitation supply services for socially excluded and ethnically discriminated groups.

ROMA ARTS, CULTURE AND HISTORY

1. The EC need to use its available cultural policies and financial support, or develop new ones, and thus target the challenges Roma cultural heritage faces.
2. The EC should make sure that all EU initiatives in the fields of arts and culture, especially those launched and promoted by the EC, are always inclusive of a Roma dimension.
3. The EC could support the establishment of Programs for Roma recognition in the majority cultural spaces, and use existing Roma organizations as a mediators.
4. The EC could support cultural spaces and institutions where Roma art has been already exposed.
5. The EC need to consider exploring the inclusion of Romanes language as one of the official languages of the EU, so as to reach out to Roma in their mother tongue and fostering the official recognition and promotion of Romanes language.
6. The EC could consider working in close cooperation with other international and intergovernmental organizations with expertise in the fields of arts, culture and history in order to promote strategic, coordinated and complementary actions across the continent in this field.

GOVERNANCE

1. The EC should mainstream the principles of the Social Pillar in the European Semester, rebalancing social and economic priorities by including Roma inclusion as an indicator in the social scoreboard.

2. The EC could play a stronger role in encouraging more effective policy coordination between actors and stakeholders in the field of Roma integration, by enabling EU institutions, national governments and national CSOs to work in synergy. This enhanced coordination should also include coordination between member states and enlargement governments to support the successful reintegration of returnees in the Western Balkans Region.
3. The EC should keep the partnership principle and code of conduct and ensure its implementation by including Roma CSOs as full partners in all stages of the preparation, e.g. the Partnership Agreements (PAs) and Operational Programmes (OP). Effective community participation should be an integral requirement across programmes addressing the issues of vulnerable communities, including Roma. The active involvement of the communities that benefit from them should become part of the design, implementation, monitoring and evaluation frameworks for these programmes.
4. The EC need to prioritise operational and action grants to Roma and pro-Roma CSOs, as these are critical for supporting and developing the capacities of independent civil society. In the distribution of funds, the EU should protect CSOs from undue government interference.
5. The EC should ask national governments to create special grant schemes that provide small, flexible funds aimed at increasing the capacity of local authorities to access EU funding for community projects. These schemes need to have fewer bureaucratic and administrative demands, and combine funding with technical assistance. Furthermore, governments need mechanism for closer coordination at country level between central, regional and local authorities on Roma integration.
6. The post-2020 MFF need to include targeted measures for Roma entrepreneurs under the umbrella of the new ESIFs. The post-2020 Entrepreneurship Action Plan could mention Roma as a specific target category, and secure civil society involvement through the process.

FUNDING

1. The EC should ensure that the next MFF's cohesion policy facilitates synergies between those overarching EU policies that are relevant to Roma issues and the post-2020 EU Roma framework; i.e. the next MFF should be closely linked to the policy priorities of the post-2020 EU Roma Framework.
2. The cohesion policy should aim to reduce disparities among regions by focusing on poor (disadvantaged) Roma neighbourhoods through investments in infrastructure and integrated measures. Special emphasis should be put on ensuring that EU funds are not used to maintain and reinforce the segregation of Roma, taking into account the diversity and complexity of Roma challenges. EU-funded investments should not boost new segregation, but focus on quality housing and improved living conditions for Roma.
3. The EC should maintain poverty reduction, Roma inclusion and access to health as thematic priorities under the ESIFs, and ensure that EU funds aiming at poverty reduction and social inclusion under the next MFF are linked to national poverty reduction strategies and action plans.
4. The post-2020 ESF regulation should maintain non-discrimination and Roma inclusion as specific targets.
5. Governments must add Roma inclusion as one of their priorities in the respective National Reform Programmes, ensuring that CSRs are reflected in the NRIS and include clear targets, adequate implementation timeframes and sufficient budget allocation.
6. Roma integration should be included as an indicator in the social scoreboard of the European Pillar of Social Rights (EPSR), as this will ensure that the EU budget is spent more efficiently on Roma and on programmes with proven EU added value. This will allow for more consistent long-term follow-up on the implementation of Roma policies.

7. The next MFF programming period 2021-2027 should include the principles of Roma Inclusion, including measures to counter antigypsyism.
8. The EC could ask member states to strengthen measures supporting initial work experience or providing on-the-job training using the full potential of the European Social Fund (ESF).
9. The EC need to ask governments to consider how measures in the context of the Microfinance and Social Entrepreneurship axis of the Employment and Social Innovation programme (EaSI) could target Roma explicitly to improve their access to microfinancing.
10. The EC should ensure that ESIF should not support ongoing segregation or investments that would lead to further segregation. The existing legal and administrative framework prohibiting such investments (such as the EC's 'Guidance for Member States on the use of ESIF in tackling educational and spatial segregation') should be rigorously reinforced by the EC services responsible for ESIF implementation.

PARTICIPATION AND EMPOWERMENT OF ROMA POPULATION

1. The EC and governments should strengthen Roma leadership, participation, empowerment and self-organisation. The EC and governments should include Roma, Sinti and other groups experiencing antigypsyism as equal partners in all stages of the policy cycle, including agenda-setting and policy formation. It should support self-organisation and other forms of empowerment, including promoting leadership and recruiting Roma, including women, to senior positions. Member states should do the same.
2. The EC and governments could ensure that mainstream projects which target Roma ensure the following: 1) the barriers which preclude Roma of benefiting are identified, 2) include specific components to overcome them and 3) include specific Roma indicators.

DATA, MONITORING AND EVALUATION

1. The EC should require the mandatory adoption of NRIS in all member states, including reference to the budgetary means for its implementation and set up a follow up tool, in order to ensure systematic EU monitoring of compliance with the rule of law and fundamental rights by national, regional and local authorities across the EU, in ensuring the equal treatment of the Roma population.
2. The EC need to promote the collection of data disaggregated by ethnicity on the Roma population, including through Eurostat periodical data collection, welcoming the contributions of national authorities as well as CSOs, so to improve the reliability and transparency of the evaluation and monitoring system, which is currently weak.
3. The EC should require governments to collect data on: 1) segregated schools and classrooms, 2) continuing barriers to enrolment, including admissions testing, 3) catchment areas, and the ethnic composition of these areas and 4) bullying and discrimination within schools.
4. The EC could encourage that in the post 2020 Roma process, the Eastern Neighbourhood countries have the same soft objectives included in 2011 for enlargement as well as improve cooperation with CSO, reinforce monitoring of implementation NRIS and better use of EU funds.

ANNEX

EDUCATION

Early school leaving (ESL) among Roma is a general problem in Hungary, Slovakia, the Czech Republic, Bulgaria, and Romania. In Hungary, according to the EC Education and Training Monitor 2018, the ESL of Roma is almost six times higher than for non-Roma (59.9% versus 8.9%). In Eastern Slovakia, where a significant share of the population is Roma, ESL is almost three times higher than in Western Slovakia (14.7% versus 4.7%). The ESL rate in the Czech Republic is below the EU average at 10.6%, but estimated at 72% for Roma. In Bulgaria, ESL is particularly high among Roma (67%) while the national average is 12.7% - which is still above the national European 2020 target and EU average. In Romania, the ESL rate among Roma is alarmingly high at 77%¹⁰¹. Various factors are to blame, including the economic exclusion of Roma families, limited parental participation, lack of motivation and the lower qualifications of teachers in Roma schools¹⁰². All these need to be addressed.

Roma children's kindergarten attendance is another challenge. Early child development (ECD) is the basis for further progress in education. The ECD of Roma is a top priority that needs significant attention

in terms of public policy shaping, professional inputs and financial investment at both the EU and national level. Integrated, quality ECD programs that reflect the needs of Roma children make the transition to an integrated primary school easier. According to the FRA, Roma ECD attendance in member states is significantly below the national averages. In the Czech Republic, only 26% of Roma children take part in ECD programmes, compared to 86.4% nationwide. In Croatia, 32% participate.¹⁰³ As a consequence, the attendance rate of Roma at secondary schools and in tertiary education is considerably lower than the national average in member states.

The root of the high ratio of segregation is not only the so called 'white flight' phenomenon or residential segregation, but also the fact that the legal framework for church-run school institutions provides an opportunity to educate children separately on a religious basis. In Slovakia 62% of Roma children attend schools where Roma are a majority¹⁰⁴. According to the 2017 *Civil Society Monitoring Report – Slovakia*, the number of children in special schools and classes was 21,498 in September 2016 compared to 22,198 the previous year.¹⁰⁵ This number is not broken down by ethnicity,

101 European Commission Education and Training Monitor 2018

102 Ibid.

103 FRA, *Second European Union Minorities and Discrimination Survey Roma – Selected findings, 2016*; European Commission, *Training and Education Monitor 2016 Croatia*

104 FRA, *Second European Union Minorities and Discriminatory Service, Roma Selected Findings, 2016*

105 *Structural and Horizontal Preconditions of Successful Implementation of National Roma Integration Strategy in Slovakia*, Civil Society Monitoring Report, 2017.

although it shows that the number of children attending special schools and classes has not fallen significantly. Another form of segregation is the common and unfortunate practice of placing children in special schools after conducting IQ tests that rely on knowledge of the dominant culture. Language barriers and stereotyped perceptions mean they are deemed backward.¹⁰⁶

Antigypsyism in the education system needs special attention, not least because children experience it at a formative age. Anti-Roma bias among teachers has a severe impact on the educational outcomes and sense of self-worth of Roma children. Furthermore, the absence of Roma educators or curriculum content on Roma history and culture creates an environment in which prejudice and dehumanising attitudes can thrive.

According to Open Society Justice Initiative's internal empirical research (2019), the bullying of Roma children takes place in both mainstream and segregated schools in Serbia and the Czech Republic. Classmates and teachers alike are responsible. The preliminary findings show that bullying often takes the form of physical punishments, slapping, psychological pressure, provocation and dehumanisation. If parents complain, teachers threaten to involve the police or social care. This is the main reason why a high percentage of children drop out. School managements seek to downplay bullying in order to protect their school's image. The

Commissioner for the Protection of Human Rights is aware of the issue but cannot act if it does not receive official complaints from Roma parents, who are often threatened by schools if they plan to do so.

HEALTH

Spatial segregation and social exclusion of Roma are often accompanied by substandard living conditions including poor sanitation and a lack of public utilities, environmental hazards including toxic industrial waste, rubbish tips, floods, and mixing of waste and drinking water. Insecure and densely-populated houses sometimes have no access to electricity, water supplies, sewerage and sanitation facilities, and waste collection is neglected.¹⁰⁷ Forced to live on environmentally hazardous land in former industrial zones, farms, mines and areas at risk of flooding, Roma are also disproportionately exposed to water, land, and air pollution.¹⁰⁸

The chronic obstructive pulmonary disease caused by air pollution is the third most common disease responsible for deaths globally (5.4% of all deaths in 2016).¹⁰⁹ Roma use coal and wood for heating and/or cooking more frequently than majority populations. Therefore, they are exposed to health risks from carbon monoxide, benzene, particulate matter and formaldehyde pollution.¹¹⁰ Women and children are particularly exposed to these health risks, as they spend more time inside their homes.¹¹¹

106 *Pitfalls and bias: Entry Testing and the Overrepresentation of Romani Children in Special Education*, 2012 http://romaeducationfund.org/sites/default/files/publications/pitfalls-and-bias-screen_singlepages.pdf

107 UNDP, *Roma Household Report*, p. 30. In all countries, the waste removal in Roma neighbourhoods was either nonexistent or significantly less frequent than in other neighborhoods. The share of insecure Roma houses was significantly larger in all countries.

108 Filčák, R. (2012). Environmental Justice and the Roma Settlements of Eastern Slovakia: Entitlements, Land and the Environmental Risks. *Czech Sociological Review*, 48 (3), 737-761; Post, D. We Didn't Fight the War, We Have to Fight the Aftermath, in the *Roma Rights Journal* 1/2017, pp. 51-58.

109 WHO, *Top 10 Global Causes of Deaths, 2016*, available at: <https://www.who.int/news-room/fact-sheets/detail/the-top-10-causes-of-death>.

110 UNDP, *Roma Housing Report*, 2012, p. 27.

111 *Ibid*, p. 28.

Many Roma continue to suffer disproportionately from the failure of public authorities to secure their access to water and sanitation. Roma, especially those living at the outskirts of towns or in completely segregated settlements, are often treated differently by local authorities when it comes to the provision

of these public utilities.¹¹² Water contamination is the main cause of infectious intestinal diseases (E.coli, cholera, ampylobacter, salmonella). Research demonstrated a strong correlation between socio-economic status and the prevalence of infectious diseases caused by water contamination.¹¹³

112 Szilvasi, M. (2018), "Parallel Claims for the Human Right to Water: The Case of Roma in Slovenia", in: Archibugi, D., Benli A. E., *Claiming Citizenship Rights in Europe: Emerging Challenges and Political Agents*, London: Routledge; Szilvasi, M. (2017) *A Thirst for Justice: Europe's Roma Denied Access to Clean Water and Sanitation*, Budapest: ERRC, available at: <http://www.errc.org/cms/upload/file/thirsting-for-justice-march-2017.pdf>; Filčák, R., Szilvasi, M., Škobla, D. (2017) "No Water for the Poor: The Roma ethnic minority and local governance in Slovakia", in: *Ethnic and Racial Studies*, pp. 1-18, available at: <http://www.tandfonline.com/doi/full/10.1080/01419870.2017.1291984>.

113 Institute of Health Politics, Ministry of Health, Slovakia, *Impact of Environment on Health of Population I: Environment and Infectious Intestinal Diseases* (in Slovak), 2018. This research also did not collect and analyse data disaggregated by ethnicity and provided no evidence of the situation of Roma.

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