



ROMA CIVIL
MONITOR

Funded by the



Preparatory Action

“Roma Civil Monitoring – Strengthening capacity and involvement of Roma and pro-Roma civil society in policy monitoring and review”

(Contract no. JUST/2020/RPAA/PR/EQUA/0095)

Guideline for CSOs on preparing monitoring country reports

*Focusing on the quality
of the new National Roma Strategic Framework*

Version 1.1
14 February 2022



The *Roma Civil Monitor 2021-2025* initiative, with the full title "**Preparatory Action – Roma Civil Monitoring – Strengthening capacity and involvement of Roma and pro-Roma civil society in policy monitoring and review**", is being implemented by a consortium led by the [Democracy Institute](#) of [Central European University](#) (DI/CEU), and including the [European Roma Grassroots Organisations Network](#) (ERGO Network), the [Fundación Secretariado Gitano](#) (FSG) and the [European Roma Rights Centre](#) (ERRC) under a service contract with the [European Commission's Directorate-General Justice and Consumers](#) (DG Just).

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This document was developed within the above-mentioned project financed by the European Commission; however, it exclusively reflects the views of the authors, and the European Commission may not be held responsible for any use which may be made of the information contained herein.

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LIST OF MODIFICATIONS

List of modifications compared to the previous version (1.0 from 31 January 2022):

- Lilla Farkas's institutional affiliation added on page 2.
- Focus of the monitoring/reporting defined on page 6.
- New section "*Involving members of RCM coalitions in report development*" added on page 15.
- New information sources (on social services and income support) added into the table "*Where to look for problem identification?*" on page 23.
- Section 4.3 "*Does the NRSF provide for the active participation of Roma and Roma ownership?*" has been eliminated and the key considerations from this section are now included in section 1.2 "*Does the NRSF provide for the active participation of Roma and Roma ownership?*". Section 4.4 has been renumbered as 4.3.
- New reference document *Checklist for the Effective Inclusion of Roma interventions within EU Cohesion Funds programming 2021-2027* added in section 3.4. "*Does the NRSF state clearly how planned measures and activities will be funded?*" on page 28 and in the list of references on page 41.

INTRODUCTION

This guideline was developed to assist Roma civil society organisations in 26 EU Member States to prepare monitoring reports during the first round of monitoring of *National Roma Strategic Frameworks* (NRSF; sometimes referred to as Roma inclusion/integration strategies or integrated sets of measures) that were developed to reflect the [2020-2030 EU Roma Strategic Framework for Equality, Inclusion and Participation](#) (EU Roma Strategic Framework) and the [Council Recommendations on of 12 March 2021 on Roma equality, inclusion and participation](#).

The purpose of the reports is to provide participatory and inclusive monitoring of the design and implementation of NRSFs by civil society actors. The report provides feedback to national authorities and informs the European Commission's monitoring of NRSF.

Given the novelty of the NRSFs in most Member States (and even the present lack of strategies post-2020 in some of them), the purpose will be best advanced through concise monitoring reports that reflect deeper analysis and focus attention on key aspects of NRSFs that can be improved to increase their impact.

These guidelines develop **monitoring questions** to assess NRSFs in line with four broad **monitoring criteria**:

1. Participation of Roma in the design, implementation, monitoring, and evaluation of the NRSF
2. NRSF's relevance to the needs of Roma people in their diversity
3. Expected NRSF's effectiveness (i.e., the likelihood that the NRSF will accomplish its stated objectives)
4. Alignment of the NRSF with the EU Roma Strategic Framework.

The first RCM reports (2022) will thus focus on the **assessment of the new NRSF as policy document** rather than implementation of specific policies and measures. As the civil monitoring is aimed at making the governments accountable, if you refer to or analyse any specific policy or measure, you should primarily focus on the governmental policies, programmes and initiatives (we include here all governance levels and structures, which are part of the "State" – central government, regional and local government or self-government, public agencies and authorities etc.). However, the reports can also include information on non-state initiatives (non-governmental organisations, charities, churches, private enterprises etc.), if:

- a. these non-state initiatives are systematically supported by the State (i. e., the government deliberately regulates or finances such initiatives), or
- b. the government reacts to the non-state initiative by mainstreaming or scaling it up, or
- c. no public initiative in the given policy field exists (so without the non-state initiative, the problem would not be addressed at all).

You should highlight both positive and negative trends compared to the previous period (pre-2020 national Roma integration strategy), as well as unaddressed challenges.

For collecting monitoring data to help address these questions using a participatory, unbiased, and evidence-based approach, the guidelines propose a **specific research design and methods that** reflect the division of Member States into four clusters based on their Roma populations.

The guidelines provide a **template for national monitoring reports**, showing how the data that is collected and its analysis can be organised in an effective way.

RESEARCH AND WRITING PLAN

Report requirements

The reports are expected to be balanced (recognising the existence of various viewpoints) and evidence-based (relying on evidence collected from research and interviews – see below – rather than based solely on the authors’ own views and opinions).

A **template** for the reports is provided in the last chapter of this guideline (*Monitoring Report Template*). The general outline includes the:

- *Executive summary*
- *Introduction*
- *Process of adoption of the NSRF*
- *1. Participation*
- *2. Relevance*
- *3. Expected effectiveness*
- *4. Alignment with the EU Roma Strategic Framework*
- *Additional Findings*
- *Conclusions and recommendations*
- *References*
- *Annexes*

*four numbered chapters =
key monitoring criteria
(the core of the report)*

Within the four chapters on monitoring criteria there are sub-sections with more specific monitoring questions (1.1, 1.2, etc.) that create the structure for the monitoring reports.

Each section has further “key considerations” – i.e., suggested topics that may be relevant. Responses to these do not need to be included in every report, but the topics rather provide some guidance about issues to consider within the subchapters.

The monitoring questions and key considerations do not in most cases represent interview questions that can be asked of respondents. Interview questions for collecting data are suggested in the Annex II (**Interview Guide**).

Desk Research

The starting point for the preparation of the monitoring reports is desk research – a review of the NRSF, the related action plan (if it exists), and policy documents, as well as analyses, evaluations, and reports that are available.

Desk research covers the following areas:

- the horizontal policy objectives of the EU Roma Strategic Framework (fighting antigypsyism, antidiscrimination, reducing poverty and social exclusion, participation)
- sectoral policy objectives (education, employment, health, housing)
- other policy areas identified by RCM as important to Roma equality, inclusion, and participation (Roma culture, environmental justice, digital inclusion, social services, child protection and income support).

The extent of the required desk research depends on the cluster the Member State belongs to – we do not give specific guidelines here, as in general the availability of relevant current documents will reflect the clustering of Member States in terms of Roma populations and the extent of significant challenges.

If a Member State is using a pre-existing National Roma Integration Strategy that has been extended beyond 2020, the RCM reports should assess that pre-2020 strategic document and its alignment with the requirements of the new EU Roma Strategic Framework and the Council Recommendations.

If a Member State does not have a dedicated national Roma strategy, the RCM reports should try to assess the relevant set of policy measures that the Member State articulated in response to the EU Roma Strategic Framework and the Council Recommendations.

Qualitative Research

Qualitative research for the purpose of monitoring reports starts with a set of so-called key informant interviews. These are in-depth interviews carried out in person, over video, or on the telephone. The first two options are more effective at collecting quality information, since non-verbal signals such as facial expressions and body language that may help the researcher to better understand the respondent's views are not observable during a telephone call.

In Annex II we provide an interview guide that has been developed to be adaptable to all types of respondents. The interview guide is presented as a table, with questions divided into topics.

The table also notes which criteria and monitoring questions the given interview question addresses.

The interviewer should only use those sections of the interview guide and questions that are relevant to the given respondent.

Key informant interviews

Preparation for key informant interviews starts with compiling a list of stakeholders to contact and adapting the interview guide. This list should then be edited to reflect the actual interviews that are carried out, their respective dates, and a record of how they were carried out (in person, online video, or by telephone).

Ideally, the table of questions provided in Annex II should be used to compile specific questions for each respondent ahead of each interview.

Ask for permission to record all interviews while assuring respondents that recordings will be solely carried out for research purposes and will not be made public. If possible, compile a team to work on these interviews together.

The following table presents the recommended minimum number of respondents in each category to contact for key informant interviews:

Type of respondent	Cluster 1	Cluster 2	Cluster 3	Cluster 4	Notes
Public authority in charge of NRSF drafting	1				Ideally start at management level with a “walkthrough” – go over the structure of the NRSF document and collect notes and remarks on all key parts
Public authorities with responsibility in key areas	1 for each area	at least 1 for each area with critical problems	at least 1 for each area with critical problems		Sectoral and other ministries One authority may be responsible for several policy fields.
National equality body	1				
Regional and local authorities in key regions	at least 4	at least 2	at least 1	at least 1	Group interviews, focus groups, round tables and other types of methods can be used here
Public authorities in charge of statistics	1				If available, also include officials involved in the FRA working group
Roma civil society and activists (broad representation incl. different groups such as Roma women, young Roma, Roma children, LGBTI Roma, elderly Roma, Roma persons with disabilities, third-country nationals or stateless, and EU-mobile Roma)	at least 6	at least 3	at least 2	at least 1	This is the most important input to be provided by the overall RCM coalition, and ideally includes CSOs outside the coalition Group interviews, focus groups, round tables and other approaches can be used
Academics, experts, analysts, international organizations, donors, diplomats	1 for each area	at least 1 for each area with critical problems	at least 1 for each area with critical problems	1	One expert may have expertise in several policy fields.

Group interviews and focus groups

Group interviews or simple focus groups (potentially carried out online) can be used to validate findings and preliminary conclusions.

A group interview simply involves interviewing several respondents at the same time. As with the individual key informant interviews, these are better carried out with two interviewers working together. Group interviews work best if respondents have similar backgrounds and are not at different levels of hierarchy (for example, interviewing a manager together with one or more of their employees may hinder the employees from voicing their views openly, or allow the manager to dominate the conversation).

A focus group is a similar instrument, but with a slightly more defined format. For an in-person focus group there are usually up to 8-10 participants who should have similar backgrounds. Compared with individual interviews, a focus group provides additional insight by allowing participants to discuss and respond to each other's statements. It requires a moderator who has experience in steering discussions in a participative manner and preventing the most vocal individuals from dominating. Someone with basic meeting facilitation skills can run a focus group relatively smoothly and bring to the research some of the benefits of this format.

An in-person focus group is suitable for having discussions with participants who are in the same location (e.g., a focus group with mothers of school-age children in a single school). This also requires space, refreshments, and recording equipment.

An **online focus group** can be carried out using Zoom or other video-conferencing software. Compared to an in-person focus group the cost is much lower as it does not require room rental, refreshments, or the transportation of participants. Due to the greater complexity of moderating a group without face-to-face contact, the suitable number of participants is somewhat fewer (5-6). Zoom incorporates a recording feature, but (as in all cases), the purpose of recording should be specified, and the online focus groups should be recorded only with participants' consent. Ideally, there will be two interviewers – one serving as moderator and the other providing technical support, feeding the moderator additional questions over chat, or stepping in as needed.

Interview Guide

Ideally, interviews should be carried out by a team of interviewers. This allows for the division of roles and may improve the capture of information and subtexts.

Interview questions are not the same as monitoring questions (see above), because many monitoring questions are composed of sub-questions that need to be asked in order to arrive at a balanced and complex assessment of the given topic.

At the start of the interview, the interviewer should introduce the RCM and the monitoring process to the respondent and explain briefly how the information that is collected will be used. It is good practice to explain to the respondent that the information they will provide can help make the implementation of the NRSF more effective. The interviewer should ask the respondent's permission to record the interview and explain that the recording will only be accessible to the researchers and be used to ensure they do not miss any of the information that is being shared.

The interview should start by asking respondents broad, open-ended questions (ones that are not easily answered with a yes/no answer) and inviting the respondent to formulate their views in their own words and share the way they prioritise the different problems or topics.

Later, the interviewer can follow up in each of the areas in relation to where the respondent has not provided all the information that is required, or raise additional questions based on the responses.

One of the interviewers should focus on taking notes, while the other asks questions.

In **Annex II – Interview Guide** we provide a table in the following format that serves as an interview guide for interviews with different groups of stakeholders. Questions are grouped into logical sets by topic – you can choose whether to use certain sets depending on the type or expertise of the respondent:

Which respondents should the question be asked of?	Question	Additional Questions (probing)	What parts of the monitoring report does it inform?
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Column 1 next to each question indicates the type of respondent to whom the question applies – such as Roma contact point, government officials, Roma CSO representatives, experts, etc.

Column 2 contains a broad starting question that can be asked of the respondent to solicit a longer answer. Additional questions in Column 3 (sometimes referred to in qualitative research as probing questions or probes) can be used to ask for additional information about aspects of the question which the respondent did not cover in their answer.

Column 4 indicates which monitoring criteria and monitoring questions the interview question helps answer.

Triangulation

The triangulation technique helps provide evidence-based assessments by cross-checking conflicting information or information provided by respondents who may have specific agendas or interests in presenting issues in a positive or negative light.

For example, if central authorities say they are well prepared, but CSOs say they are not, try to identify other evidence that supports the statements that are expressed, or seek out a third respondent – if possible, from another stakeholder group (e.g., local government or regional government).

Participatory observation

Many CSOs participating in the RCM initiative are intensively involved in different policy processes and structures (they participate in consultations with public authorities, meetings, workshops, seminars and training events on topics directly or indirectly related to the topics covered by these guidelines), provide services to Roma at the local level or organise and empower local communities. Accordingly, their own experience from the grassroots level is a valuable source of information about the needs and interests of Roma, how national policies work in reality (how they reach and impact Roma), what barriers Roma face in accessing public services, how effective safeguards against discrimination and racism are, and what the view of target groups is about public policies.

Such experience should not be devalued as ‘anecdotal evidence’ but instead taken seriously as valuable qualitative insight into the needs that should be addressed by NRSF, and the effectiveness of pre-existing policy as implemented at the local level.

However, the authors of the report should always indicate that a statement is based on the experience of specific CSOs from specific localities, and note how frequent the described problem/situation is: if it happens only seldom, the argument is weaker, yet it may indicate specific problems/situations that are omitted by public policy that can have serious and long-term impacts on people's lives. On the other hand, a problem/situation can occur frequently and despite not having severe consequences may indicate a systemic gap or failure of public policy. In both cases, the described failure can indicate that even well-intended policies do not fully respond to the conditions of marginalised communities, mechanisms of exclusion, or that implementation lacks an important element that would make it more accessible and effective for marginalised target groups.

Other data-gathering instruments

Additional instruments to consider using for collecting information may include, for example, **online surveys** – a questionnaire can be composed and sent out to additional respondents. Response rates for email questionnaires are notoriously low, so this approach requires the careful drafting of the questionnaire (not too long, not requiring long written responses but rather short lists or assessments using scales, or ranking pre-defined items) and the appropriate selection of recipients (ideally ones who you can follow up with by phone to encourage them to provide answers).

Nonetheless, online surveys are a good way to increase participation and the representativeness of the monitoring report when capacity limitations do not allow for further individual or group interviews.

Research ethics and the protection of personal data

The development of the RCM country reports should follow ethical standards – these are safeguards of the credibility of the reports and the whole RMC project, while they also protect the reports' authors and their information sources.

Overall **responsibility for ethical standards in research and reporting and the protection of personal data within the RCM project rests with the authors of the RCM reports** that are subcontracted by CEU. CEU provides authors with general guidance and can provide more specific advice upon request.

Authors of the RCM country reports should respect the principles of integrity, honesty, and openness, and make a commitment to intellectual honesty and taking personal responsibility. Research should also aim to benefit society and minimise social harm – for example, by avoiding reproducing or strengthening negative stereotypes.

Conflict of interests

The authors of the RCM monitoring reports or CSOs participating in their development can find themselves in circumstances that could be interpreted as potential conflicts of interests. There are at least two typical situations in which this can occur:

1. They report on policy documents (NRSF), policies, programmes, or initiatives that they themselves have developed, or report on authorities they depend on for funding, benefits, or other types of support. In such cases, they can be accused of having a positive bias.

2. They report on authorities with which they are in legal, political, or expert conflict, or which have rejected their request for funding. In such cases, they can be accused of having a negative bias.

To prevent such accusations and the credibility of the whole monitoring report being contested, it is important that authors or CSOs engaged in developing the report openly declare and describe (e.g., in a footnote) their relation to the authority or policy (positive or negative) that is the subject of reporting, and make sure that their statements are substantiated by unbiased evidence (such as statistical or other publicly available data), proper references to third-party resources (e.g., publicly available studies, information from the media) or third-party opinions (unbiased experts). It is always useful to give the authorities with which the authors may be in conflict the possibility to explain their position (and to express an alternative opinion, or demonstrate that the authority's claim is false if you have the necessary evidence or arguments).

Protection of involved individuals and informed consent

Research involving individuals must be undertaken to obtain knowledge. Prior to, during, and following the completion of research activities, researchers are expected to consider the ethical implications of their research and any of its consequences for the participants that are involved. In the case of the RCM project, harm to participants may arise from potentially negative professional or personal consequences connected with providing information for the RCM reports (such as punishment for sharing internal information/knowledge or expressing personal opinions in the case of public authorities).

Before conducting research involving people (e.g., interviews), respondents must be informed that the interaction is part of research aimed at developing the RCM country reports, and should understand the nature of the research and consent to providing information. When obtaining consent is possible only *ex post facto* ('after the event' – for example, when using information obtained at an earlier date; or at events not organised within the RCM project that provided information relevant for developing the RCM country report), the researchers should obtain the consent of informants before including such information into the RCM country report. Ideally, consent should be obtained in writing but when this is not possible, oral consent should be obtained and documented.

Giving consent is not always a one-off instance and participants have the right to change their minds and withdraw consent at any time. However, if the withdrawal of consent occurs at the time when it affects the finalisation of the research (for instance, shortly before the submission of the draft report), the withdrawal should result only in the deletion of all the personally identifiable data of the participant.

Personal data

Authors must be committed to protecting and respecting the privacy of individuals and safeguarding their personal information, particularly personal data – i.e., any information related to an identified or identifiable natural person such as names or other indirect identifiers (e.g., the professional position that would enable identification of the person).

Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, as well as data related to health or concerning a natural person's sex life or sexual orientation are considered special categories of personal

data that can be collected and used only for the legitimate purpose for which an explicit request for written consent was made and granted to collect, store, and use such special personal data. Written consent is not necessary if the information concerning the special personal data are quoted from publicly available sources that are properly referenced in the RCM country reports (e.g., a quote from a press article in which a person reveals their political opinion or ethnic origin).

The collection, storage, disclosure, and use of personal data by researchers must comply with all legislation relating to data protection and arrangements must be put in place by researchers to carefully protect the confidentiality of participants and their data. Details that would allow individuals to be identified must not be published or made available to anybody not involved in the research unless explicit consent is given by the individuals concerned. Consent should ideally be in written form (e.g., by e-mail) and authors should keep the proof of consent in case of potential disputes.

Anonymity

The RCM country report should guarantee confidentiality and anonymity if a participant requests this. Guarantees of anonymity can help the RCM country report authors to access important information – for example, about the decision-making of authorities. Even in such cases, the authors should properly reference the source of information while respecting their anonymity (e.g., by indicating “representative of X [authority]”).

Involving members of RCM coalitions in report development

The RCM country reports should reflect views of wider civil society – at least the national RCM civil society coalition. Therefore the national RCM coordinators should involve into their development other members of their respective national RCM coalition – depending on their interest and capacity.

Consultation

As a minimum requirement, the authors of the reports should conduct at least two rounds of consultation: The first consultation should be focused on what topics need to be analysed in the report. And the second consultation should concern the draft report (mainly, its conclusions and recommendations). Potential disagreement does not necessarily devalue the reports, but diverging views should be presented in the final version of the report (e.g., in form of footnotes, explaining that specific CSO or expert does not agree with the given assessment/conclusion, and explaining their justification). Such diversity of views will not make the report weaker, on the contrary, it will demonstrate the complexity of the discussed issues.

Participation of less experienced CSOs

Even less experienced CSOs can meaningfully participate in the report development what will increase their ownership of the report, include their experience, and enable them acquiring new skills. The national RCM coordinator can develop for them simple methodology to collect information in their community (e.g., few questions they can ask local stakeholders and Roma inhabitants) and to draft a short paragraph of how a specific policy or measure is implemented at the local level or what is people’s experience/view on the policy/measure. Such short text-boxes can make the report livelier.

MONITORING CRITERIA

Monitoring reports will be based on four key monitoring criteria – participation, relevance, expected effectiveness, and alignment with the EU Roma Strategic Framework. In this document, these criteria are numbered 1 – 4. The proposed structure of the reports presented in the template associated with in these guidelines also uses these four criteria.

Criteria are applicable to all clusters of EU Member States, but the depth of assessment will vary.

The criteria are further subdivided into monitoring questions indicated by two-digit subheadings (e.g., 1.1, 1.2, 1.3, etc.). All reports should seek to respond to these monitoring questions, but the depth and length of responses will differ significantly depending on the cluster the Member State belongs to and the specific challenges relevant to its Roma population.

The monitoring questions are supported by additional, deeper questions that we refer to as “key considerations”. Among them you should only address those that are relevant to your country situation. Those that do not apply do not need to be answered or included in the structure of the country monitoring reports.

1. Participation

The first major area of assessment in our reports is the participation of Roma in the NRSF in all its key phases: preparation, implementation, monitoring, and evaluation.

Roma participation in shaping public affairs is seen as a precondition and an enabler of equality and inclusion, and as promoting democratic and efficient governance. The EU sees Roma-led and pro-Roma civil society organisations as particularly important actors.

The broad representation of different parts of the Roma community, including intersectional considerations, is important due to the EU Roma Strategic Framework’s requirements for meaningful Roma participation at all stages of consultation and decision-making. It also increases the likelihood of successful implementation of the NRSF due to Roma ownership and support.

The participation concept sought in monitoring is meaningful effective participation as opposed to formal participation, tokenism and other participatory activities, which fail to effectively accomplish the objectives of participation. Meaningful effective participation eludes a simple definition because it is context-specific.

Depending on the make-up and capacity of Roma and pro-Roma civil society, academia and other relevant actors. Participation requires the use of several parallel mechanisms to both engage Roma broadly (e.g. enable small local NGOs to participate in discussions of issues of concern to them in a way that reflects their preferences and capacity constraints) but also engage with effective depth (e.g. involve organizations with specific sectoral expertise in depth in the formulation of policies in the given area).

There are often ways that public authorities can claim to enable participation of Roma without enabling meaningful effective participation. The monitoring questions key considerations below guide towards assessing participation with these issues in mind but it is important to use local knowledge and judgment in suggesting ways, in which the quality of participation could be further increased.

1.1. Was the NRSF prepared in a participative way, and does it clearly reflect the views and priorities perceived and identified by the Roma themselves?

The European Commission encourages the national authorities responsible for the development of the NRSFs to use participatory models – e.g., by facilitating thematic working groups that undertake needs assessments, formulate priorities and targets, undertake action in key fields, bring together national, regional, local, and non-governmental actors, and ensure the diverse and meaningful participation of Roma throughout these processes.

Key considerations:

Did the NRSF involve sufficient consultation with the public, Roma civil society, and a wide range of experts?

The processes of consultation differ between countries both in terms of rules and in terms of policies and practices. Nonetheless, it is expected that important public documents should undergo open and transparent public consultation.

Quality public debate is supported by giving stakeholders sufficient time to review drafts, formulate their opinions, and contribute with suggestions and recommendations. This is especially true in consultation processes in which there are participants who are not employed to review these documents – e.g., civil society, or the broader public.

Was the consultation open to all interested parties, or only to those invited?

Ideally, consultative processes should both actively solicit input by inviting relevant stakeholders to take part in drafting and comment, but also open these processes to broad participation.

What was the scope of the consultation?

This question assesses the extent to which the relevant stakeholders were involved in all relevant policy areas identified in the EU Roma Strategic Framework and this guideline. It is important to identify whether Roma and pro-Roma civil society, experts and academia were involved in the drafting of the NRSF from the start and throughout the whole process (e.g., starting from needs assessment through the formulation of measures, targets, indicators, monitoring and evaluation framework, to the allocation of funding), or only at some stages. The report should also identify whether the draft NRSF was prepared solely by public authorities and only then presented to civil society.

Were the inputs provided by Roma and pro-Roma civil society taken into consideration when formulating the NRSFs?

Participation in policymaking should go beyond simple one-way communication (this can be considered tokenism). The report should assess to what extent the views, suggestions,

and proposals of the members of civil society, experts and academia who were consulted were actually considered and adequately included in the final version of the NRSF.

Was the previous strategy properly evaluated and were relevant lessons learned in areas where objectives were not met?

1.2. Are Roma included as active participants in the implementation of the NRSF and in the monitoring and evaluation process?

The EU Roma Strategic Framework recommends using the networks formed during the participative drafting of the strategy later in the monitoring progress and evaluation of implementation.

In addition to monitoring and evaluation, Roma can and should play a role in implementation as partners (as civil society organisations contracted to implement measures, or through cooperating during implementation in various other ways/capacities).

Roma should also be part of the teams in public institutions at all levels that are involved in the implementation of the strategy.

Roma professionals should also be part of the teams in public institutions that are involved at all levels in the implementation of the NRSF, while authorities should proactively try to hire more Roma professionals not only in connection with NRSF but also as mainstream professionals.

Key considerations:

Does the NRSF provide for the capacity-building of Roma?

Are specific measures addressed to Roma civil society organisations that promote close collaboration with them?

Are Roma adequately represented among the staff and paid experts of national Roma contact points, regional and local administrations, and other public bodies involved in the implementation of the NRSF?

Is there a plan to engage more Roma professionals as mediators?

This should help overcome the persistent lack of trust between Roma and majority communities.

Is there a plan to use EU and other funds to provide regular capacity-building support (regarding equality screening, participation, etc.) – in particular, for grassroots and local civil society?

In Member States with a significant Roma population (Cluster 1) is there a plan to promote positive action to increase Roma participation in national and local administrations?

1.3. Is there an established system of consultation with Roma and pro-Roma civil society and other relevant stakeholders for the purpose of policymaking and implementation, including specifically for the NRSF?

Key considerations:

In Member States with a significant Roma population, does national consultation and dialogue empower the Roma, including young people and women, and enable their meaningful participation?

Are diverse groups of Roma represented in policymaking processes?

Consultation should include CSOs and experts and individuals who represent (the interests of) Roma women, young Roma, Roma children, LGBTI Roma, elderly Roma, Roma persons with disabilities, as well as, if applicable, third-country or stateless Roma and EU-mobile Roma.

Is Roma civil society included in the consultative and cooperative processes?

Civil society actors such as non-governmental organisations, social partners, and academics/researchers should be involved in line with the fundamental principles of good governance, participation, openness and transparency. The involvement of civil society is recognised as vital both for the mobilisation of expertise and the dissemination of knowledge required to develop public debate and accountability throughout the policy process.¹

Has the National Roma Contact Point set up the minimum compulsory processes and channels to ensure Roma participation in policy development, implementation, monitoring, and evaluation, and the programming of EU funds of direct relevance to the situation of Roma?

These should include written protocols of participation that set out the mandate (scope and nature of engagement), composition (principles for selecting members), working methods, and expected outcomes of consultation and participation bodies, with a view to ensuring effective and result-oriented cooperation, trust, and accountability.

1.4. Does the NRSF create systematic opportunities for the empowerment of Roma at the local level?

This should enable ownership and action aimed explicitly at bringing about social and political change. Mobilization should be seen as a deliberate inclusive and participatory process involving Roma people, local authorities, and organisations.

¹ Principle 9 – Involvement of civil society.

1.5. *Are there specific measures in the NRSF aimed at building the capacity of Roma civil society?*

Key considerations:

Is there a clearly established plan for promoting civil society cooperation between Roma-focused and mainstream organisations, especially those that target children's, young people's and women's rights?

Is there a plan for establishing and funding Roma umbrella organisations?

In Member States with a significant Roma population, the EU Roma Strategic Framework recommends considering establishing national Roma umbrella organisations for supporting sustained consultation and participation in policy discussions. These should receive core institutional grants from national governments or regular civil society support funds.

2. Relevance

The monitoring criterion of relevance is the focus of assessment of quality of the NRSF.

We consider an intervention relevant if it addresses the most significant challenges and needs. We therefore look for evidence concerning the quality of the needs assessment processes underlying the formulation of the NRSF. In order for the NRSF to be relevant to the needs of Roma, it needs to be based on strong **problem identification** as well as on the identification of the root causes generating those problems. If problems are not properly identified, quantified, and analysed sufficiently, it is problematic to assess the relevance and potential efficiency of the measures proposed to address them, as well as evaluate their potential impact.

Further questions include the **relevance of the NRSF** proposed to address those problems – we need to assess whether the approaches chosen (specific measures and actions) are appropriate for dealing with the most significant problems of the target beneficiaries.

We also review whether the NRSF explicitly recognises and is relevant to the needs and challenges of various subgroups of Roma who are known to suffer from multiple forms of intersectional discrimination and intersectional issues/specifics.

A final area for assessing relevance focuses on the **objectives set by the NRSF** and their relevance to the actual challenges that are identified.

In order to identify if the NRSF addresses the most significant problems, this section assesses all the key policy areas affecting the Roma. Each policy is covered by one section:

- 2.1. *Fighting antigypsyism and discrimination*
- 2.2. *Education*
- 2.3. *Employment*
- 2.4. *Healthcare*
- 2.5. *Housing, essential services and environmental justice*
- 2.6. *Income support (social protection)*
- 2.7. *Social services*
- 2.8. *Child protection*
- 2.9. *Promoting (awareness of) Roma arts, culture, and history*

Each section (policy area) will need to assess:

1. What are the most critical (if any) challenges in the given policy field that affect the Roma in the given country?²
2. Does the NRSF identify the challenges correctly and provide sufficient understanding of them?
3. Does the NRSF contain relevant measures for addressing these challenges?

Please focus only on 1-3 of the most critical challenges in each area. Other issues can be identified in Annex I.

To verify whether the NRSF identifies the most significant challenges, you need to review recent expert assessments of Roma inclusion in the given country – both domestic and international, as well as problems identified by experts, policy makers, and civil society stakeholders as part of monitoring research.

The following table provides a partial list of resources that should be consulted during the problem analysis. In addition to these, you should use other domestic and international analyses, as well as information from CSOs and other experts that has been collected through research for the monitoring report.

² Please note that challenges should be addressed by public policy in two cases: first, if they concern many people (even if their impact is not extreme); and second, if they concern only a few people, but their impact on these people is deep and significantly excludes them from society.

Where to look for problem identification?		
<i>General resources</i>		
Council Recommendation on Roma equality, inclusion and participation	https://data.consilium.europa.eu/doc/document/ST-6070-2021-INIT/en/pdf	Review recommendations sections
Report on the implementation of national Roma integration strategies (2019)	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52019DC0406&qid=1591613211496	Review "Priorities to be addressed" in Education, Employment, Health, Housing, Discrimination and antigypsyism
RCM Country Reports – first, second and third monitoring cycle	https://cps.ceu.edu/roma-civil-monitor-reports	Review recommendations
Analytical document accompanying the Communication from the Commission to the European Parliament and the Council "A Union of Equality: EU Roma Strategic Framework for Equality, Inclusion and Participation"	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020SC0530	Review Section 3.2 "What are the problem drivers?"
FRA Roma and Travellers Survey	https://fra.europa.eu/en/news/2020/roma-and-travellers-survey-europe-needs-break-vicious-circle-poverty-and-discrimination	
Sustainable Development – UN Knowledge Platform – Voluntary National reviews	https://sustainabledevelopment.un.org/vnrs/	Find reviews concerning your country
<i>Resources concerning the fight against racism and discrimination</i>		
ECRI Country Reports	https://www.coe.int/en/web/european-commission-against-racism-and-intolerance/country-monitoring	Review recommendations
FCNM Advisory Committee country reports	Country-specific monitoring of the implementation of the Framework Convention for the Protection of National Minorities (coe.int)	Review recommendations, especially on curricula and textbooks
LEGALNET (European network of legal experts in gender equality and non-discrimination) country reports	Countries - European Equality Law Network	Review the following sections: 3, 5, 7
<i>Resources concerning sectoral policies</i>		
EC Education and Training Monitor	https://op.europa.eu/webpub/eac/education-and-training-monitor-2020/countries/countries.html	Review main points
European Parliament Briefing on Minimum Income Protection (with useful links)	https://www.europarl.europa.eu/RegData/etudes/BRIE/2021/662900/IPOL_BRI(2021)662900_EN.pdf https://www.europarl.europa.eu/RegData/etudes/STUD/20	Review your country in the league tables and the proposals

	21/662932/IPOL_STU(2021)662932_EN.pdf	
EU-financed research effort on inclusive growth (InGRID)	https://www.inclusivegrowth.eu/project-output	Search for papers on topics and countries
European sources on the need for and effectiveness of social protection and income protection schemes	https://ec.europa.eu/eurostat/web/microdata/european-union-statistics-on-income-and-living-conditions	Detailed statistics on poverty (check if friendly researchers in your country use it)
Global Partnership to End Violence Against Children	https://endcorporalpunishment.org/resources/	Country reports on legal and policy frameworks as well as practice
ILO Country updates on child labour	www.ilo.org/global/topics/child-labour	
EU anti-trafficking action	https://ec.europa.eu/anti-trafficking/eu-countries_en	
Early marriage	www.girlsnotbrides.org	Campaign on early marriage. Some countries with specific reports
Statelessness and birth registration	www.statelessness.eu	Focussed, single-issue and highly necessary campaign
Statistics and microdata	https://ec.europa.eu/eurostat/web/income-and-living-conditions	SILC special survey of 2016 on access to services
European Social Policy Network	https://ec.europa.eu/social/main.jsp?langId=en&catId=1135	Regular country reports, not always published – contact your national expert!
European Anti-Poverty Network	https://www.eapn.eu/news-and-publications/publications/eapn-position-papers-and-reports/	Reports on benefit systems and basic social services
Professional organisations by service area	https://eacea.ec.europa.eu/national-policies/eurydice/index_en.php_en	EACEA and UNICEF on early childcare, Eurofound on living conditions, etc
EU data sources, e.g. MISSOC	https://ec.europa.eu/social/main.jsp?langId=en&catId=794 https://ec.europa.eu/social/main.jsp?catId=815&intPageId=1210&langId=en	Description and conditions of services and policies
Statistics and microdata on the need for and effectiveness of social protection and income protection schemes (EU-SILC)	https://ec.europa.eu/eurostat/web/income-and-living-conditions	Detailed statistics on poverty (check what friendly researchers in your country use it)

We seek to identify potential gaps in problem identification – not only unidentified problems but also significant problems that the NRSF may mention but whose characteristics are not sufficiently understood to be able to formulate measures to address them.

One area that requires a specific focus in problem identification is the understanding of inequality and antigypsyism as potential dimensions of the problem. The identical terms 'equality' and 'anti-/non-discrimination' cover both inequality and antigypsyism. Discrimination against (inequality suffered by) Roma and antigypsyism are overlapping concepts. The former broadly describes racial or ethnic discrimination against Roma, while the latter focuses on the racialisation of Roma by discriminators, particularly in connection with hate speech, hate crimes, and ethnic profiling (by the police, border guards, algorithms, etc.).

The following key considerations should be applied to all policy areas in each of the sections of Chapter 2:

Key considerations:

Does the NRSF draw on relevant data sources?

If there are areas where reliable statistical data disaggregated for Roma are lacking or out of date, assess whether the NRSF includes specific plans for collecting these statistics.

Does the NRSF reflect the diversity within the Roma community in terms of needs identification, problem analysis, and strategic objectives?

The NRSF should reflect this diversity by identifying challenges, setting targets, and defining measures for specific groups, including Roma children, women, young people, older Roma or those with disabilities, EU-mobile citizens, non-EU nationals, and stateless Roma.

This assessment needs to be made with reference to relevant subgroups that are represented in the country – there is no formal need to make references to groups that are not relevant in specific country contexts (e.g., if EU-mobile citizens are generally not present in the country, there is no need for the NRSF to discuss them).

Are the strategic objectives defined by the NRSF relevant to the challenges that are identified?

Assuming the NRSF correctly identifies the priority challenges of the Roma, the subsequent question is if the strategic objectives outlined in the document focus on these problems.

If the objectives are highly relevant in this sense, their achievement would mean a significant improvement in the areas of challenge previously identified.

3. Expected effectiveness

Assessments of effectiveness focus on the fulfilment of objectives. Because this round of monitoring is focused on NRSFs at their earliest phase of implementation (if they exist at all), the assessment of effectiveness should focus on assessing whether all the known preconditions are in place that are usually required for successful strategic interventions.

3.1. Is the NRSF coherent in relation to other domestic policies and associated European policies and activities?

For the NRSF to be effective, it should be closely aligned with other domestic strategies and policy documents. If these contradict the ambitions contained in the NRSF or simply do not make mention of them, the NRSF will be less likely to succeed.

Evaluation of the previous National Roma Integration Strategies until 2020 found that while Roma inclusion goals were mainstreamed into most EU-level policies, most strategies did not connect well with public policies at the national level, and cited the National Roma Contact Points' lack of influence on mainstream policies as the key obstacle.³

At the EU level, the NRSF should also be aligned with documents that underlie EU policies and financial instruments.

The purpose of assessing coherence is to establish whether the NRSF appropriately reflects other national strategies and policy documents in relevant areas and is coherent in relation to them.

When the strategy extends beyond the content of other national policy documents, it should include provisions for creating the missing policies or updating existing ones.

Key documents to consider when assessing coherence include currently valid national strategy or policy documents in the sectoral areas addressed by the NRSF (education, health, housing, employment), horizontal areas (antiracism, anti-discrimination, fighting poverty and social exclusion and others), and in other related policy areas.

At present, this includes the National Reform Programmes and Stability/Convergence Programmes within the mechanism for economic and fiscal policy coordination of the European Semester, Partnership Agreements for the 2021-2027 EU funds programming period, and when available, operational programmes. Of further interest are NextGenerationEU Recovery Plans – documents related to EU funds in the post-COVID recovery period and other national strategic documents.

When there are relevant policy documents at the subnational level (for regions and municipalities) and these levels of government have a significant potential effect on the success of the NRSF, it is also appropriate to assess coherence with these documents.

Key considerations:

Are other national policy documents referred to in the NRSF in a relevant way?

Please list those national policy documents that the NRSF refers to in an actionable way. If a document is simply listed but not reflected in specific planned actions and analysis, this may not be considered adequate.

³ Report on the evaluation of the EU Framework for National Roma Integration Strategies up to 2020, available at: https://ec.europa.eu/info/sites/default/files/com_2018_785.pdf.

When changes in other policy documents are required to meet the objectives of the NRSF, are these listed clearly?

NRSFs may require changes to other national strategies or policy documents. If so, they should be specified to the extent that will allow for the monitoring of the implementation of these changes in the future. For example, it may not be sufficient to say that a certain strategy will be updated as needed, but the expectation is that it is made clear which aspects of the strategy are expected to be modified and in what way.

If appropriate, does the NRSF include references to institutional or administrative reforms that will contribute to the equality and inclusion of Roma?

In some Member States there may be significant barriers to Roma equality and inclusion stemming from institutional and administrative barriers and deficits. In these countries, addressing the problems of discrimination and the lack of socio-economic inclusion may require the implementation of reforms in public administration at a central or subnational level before implementing other measures.

3.2. Is the responsibility for ongoing coordination and monitoring of national strategy mandated and attributed appropriately?

It is important that the responsible authorities are adequately equipped and empowered with necessary resources, staff capacity, and institutional authority to effectively coordinate and monitor the implementation of the NRSF.

The EU Roma Strategic Framework calls for an even stronger role and more ambitious commitments for Member States with a significant Roma population.

Additionally, it must be clear which institution or unit is responsible for every measure that is part of the national strategy. Such responsibility should be attributed appropriately to those parts of the public administration that have the authority to ensure implementation.

Key considerations:

Is the public body responsible for the NRSF appropriately located within the governance structure, endowed with relevant authority, and supported with the necessary political backing?

Does the national Roma contact point have adequate and necessary resources, staff capacity, and institutional authority for the coordination and monitoring of the implementation of policies, measures, activities and interventions that promote equality, inclusion, participation, and local outreach?

According to the EU Roma Strategic Framework, for Member States with a share of Roma in the population of over 1%, the role of the NRCP should be strengthened so that it can:

- A. count on a dedicated team and institutional mandate that ensures political weight, effective cross-sectoral coordination and the mainstreaming of Roma equality and inclusion at regional and local levels;
- B. be involved (by EU fund-managing authorities) in the coordination of cross-governmental discussions about the distribution of EU funds for Roma, and in

systematic monitoring of their use (e.g., through monitoring committees and Roma inclusion impact screenings);

- C. ensure national consultation and dialogue that empowers Roma (in particular, involving young people and women); and
- D. ensure that public policies and universal services target Roma effectively, including those living in remote rural areas (e.g., including emergency and medium-term measures in times of crisis, legislative reform, policy planning for education, employment, healthcare, housing, other areas of socio-economic inclusion, social services, transport, minimum income systems, and anti-discrimination legislation).

National contact points should also be funded appropriately from the national budget and if appropriate, also using EU funding.

Have relevant line ministries, state offices and subnational governments been involved in the design of the NRSF?

Successful implementation of the NRSF requires ownership not only of national Roma contact points but also of other sectoral ministries and public bodies that are later expected to take part in various measures defined in the NRSF.

Do the NRSF and other measures provide for the involvement of relevant line ministries, state offices and subnational governments in the implementation of the NRSF?

Have the national equality body and other national human rights institutions been included in the design and monitoring of implementation of the NRSF?

Have regional and local authorities been included in the design and implementation of the NRSF?

3.3. Is the NRSF planned out realistically and in sufficient detail?

While strategies take on different formats based on each country's procedures and the attention devoted to the topic, in general, they are expected to be sufficiently detailed in terms of specific measures to be implemented and their timelines and indicators to allow the monitoring and evaluation of implementation, as well as the extent to which the targets thus established are accomplished by 2030.

Key considerations:

Are all measures associated with clear timelines and deadlines?

For monitoring purposes, it is important to know the key dates by which the individual measures or partial steps required to implement measures are to be carried out. If such details are missing, this not only threatens the implementation of the NRSF but also complicates monitoring of its progress.

Are the deadlines and timelines realistic?

If timelines and deadlines are part of the NRSF, it is important to assess if these are realistic in relation to the steps that are required and the usual duration of public administration processes.

In particular, when there is the expectation of legislative activity or launch of programs in the public sector, etc., time should be realistically allocated for all of the required steps.

For a credible strategy it is important to define the timing of various measures and the milestones that lead to their completion. Otherwise, it will be impossible to establish through monitoring whether certain activities are on track or behind schedule, thereby endangering the success of implementation.

Does the NRSF correctly identify and mitigate risks to its success?

Experience with Roma inclusion has shown that there are numerous risks to success. These generally include political risks (when elected governments do not support Roma equality and inclusion).

3.4. Does the NRSF state clearly how planned measures and activities will be funded?

Having funding allocated or mechanisms in place to ensure the allocation of funding to finance measures in the NRSF is one of the key prerequisites of successful implementation.

There are differentiated expectations concerning the level of detail about the funding of measures in the NRSF depending on the share of Roma in the national population. Member States with a share of less than 1% are expected to set out how EU and national funds and financial instruments will be dedicated to the Roma. Member States with a share of Roma greater than 1% of the population should set out how EU and national funds and financial instruments will be invested to improve inclusive mainstream policy reform and targeted action.

Key considerations:

Is funding clearly defined for all measures?

There are three possible assessments – either the latter is not stipulated and nor is it clear from the context how most or many of the measures will be funded; or the source of funding is specified without clear allocation (e.g., the NRSF specifies which budget will fund the given cost item but does not specify the cost and does not make clear if the allocation has been made or how it will be made); or funding is specifically stipulated alongside clear details about the nature of its allocation.

If appropriate, does the NRSF detail the use of national and EU funds and financial instruments to be invested for the Roma or for inclusive mainstream policy reform and targeted action?

This represents an invitation from the European Commission for...

- Member States with significant Roma populations (Cluster 1) to invest in making mainstream policies inclusive through reform, as well as activities targeted at the Roma;
- Member States, where appropriate in their specific national context (i.e., particularly Clusters 2 and 3), to outline investments into Roma.

European Network for Roma Inclusion under ESI Funds has compiled a practical [Checklist for the Effective Inclusion of Roma interventions within EU Cohesion Funds programming 2021-2027](#), which provides useful practical information on what aspects of Roma interventions to review in the EU funds framework.

Where appropriate, does funding also include the use of private capital?

Explore the mobilisation of private capital, and the pooling of funds (with, e.g., philanthropic organisations) through potential matching schemes to respond to the unaddressed needs of the most vulnerable.

Is funding allocated efficiently (best known interventions, rational investment that reflects the priorities endorsed by Roma communities using appropriate procedures which reflect the transfer of evidence-based policies)?

For the NRSF to be effective, funding that is allocated should be efficient (i.e., should lead to results at the least reasonable cost and reflect the best available practice of earlier domestic strategies and international evaluations).⁴

It is beyond the scope of the monitoring report to make complex assessments about efficiency by looking at cost-benefit ratios or value for money.

However, in some cases it will be obvious whether available funding is being used inefficiently on the basis of some indicators.

When appropriate, are funds allocated through transparent and effective competitive procedures?

Are there any cases of the use of approaches that have been shown to be inefficient?

For some areas of intervention there are recognised studies that show the relative efficiency of interventions with similar objectives. For instance, it is well known that it is much cheaper to start working with younger children who face multiple forms of marginalisation than with older children – thus an intervention for school-age children without efforts to help children at the pre-school age would be considered inefficient.

In general, the European Commission recommends prioritising prevention and early intervention for cost-efficiency reasons (and to generate sustainable changes over the long-term).⁵

Another area where there are numerous findings is active labour market policies and social services.

The expert interviews can be used to collect input about the issue of efficiency.

⁴ Also see Principle 6 on the transfer of evidence-based policies in *The 10 Common Basic Principles on Roma Inclusion*, available at: <https://op.europa.eu/en/publication-detail/-/publication/7573706d-e7c4-4ece-ae59-2b361246a7b0>.

⁵ Report on the implementation of national Roma integration strategies (2019), available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52019DC0406>.

3.5. *Is an appropriate monitoring and evaluation framework in place in relation to the processes and outcomes of the NRSF?*

Formal recommendations and expectations have been set out by the EU Roma Strategic Framework for monitoring and evaluation. Monitoring and evaluation are key elements of a long-term strategy because it is expected within the 10-year horizon that many contextual variables will change.

Monitoring should provide a way to identify progress with the measures outlined in the NRSF and, where needed, to review policies and make adjustments to increase the likelihood of meeting such objectives.

Evaluation serves multiple purposes – during the implementation phase it can provide feedback that helps make adjustments.

Monitoring and evaluation should be systematic. It must be clearly stipulated who is in charge, what the frequency will be, how these functions will be implemented in a participative manner, and how they will be financed.

Key considerations:

Are additional outcome indicators defined?

The outcomes of EU targets represent a minimum framework, and are not very granular. For example, in an area of policy such as health, a lot of changes in activities, programmes, and measures (process) may lead to improvements in outcomes for Roma (e.g., regarding the prevalence or severity of specific diseases) without having a visible effect on the main targeted outcome (the life expectancy of Roma).

The NRSFs should therefore contain other outcome-level indicators (measures of how the lives of Roma are at present, and how they can be changed based on the successful implementation of the NRSF).

Are process indicators in place?

Process indicators are a concept derived by FRA from the “Structure – Process – Outcome” framework used by the UN Office of the High Commissioner for Human Rights (OHCHR) to assess compliance with human rights standards.

Is data collection planned to support and inform implementation?

In addition to FRA data collection, the NRSF may require the collection of data by national authorities – in particular, national statistical offices, but also from separate agencies in charge of sectoral statistics (employment and social services, health, education, housing, anti-discrimination) insofar as they exist.

Regarding the “Report on the implementation of national Roma integration strategies”,⁶ data that is collected should be disaggregated by gender and age to inform needs and

⁶ Report on the implementation of national Roma integration strategies (2019), available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52019DC0406>. Also see footnote 26 to the EU Roma Strategic Framework.

context analysis, generate baselines and targets, as well as create information for outcome and impact indicators.

Is a dedicated budget for monitoring available?

Both data collection for monitoring and participative monitoring require the allocation of resources. This should be made explicit in the NRSF.

In Cluster 1 and 2 countries, is a mid-term evaluation and review of NRSF planned?

In Cluster 1 countries, is the National Roma Contact point involved by EU fund managing authorities in the coordination of cross governmental discussions on the distribution of EU funds for Roma and in systematic monitoring of their use through monitoring committees or Roma inclusion impact screenings?

Have close links been established between national Roma contact points and the authorities responsible for monitoring EU funds?

To fight multigenerational poverty, the NRSF wants to ensure that the use of EU funds for Roma creates real opportunities for participation and has the intended day-to-day impact for them, rather than benefiting other interests.

3.6. Is the NRSF likely, based on all the information that has been gathered, to meet its objectives and contribute to solving the problems that have been identified in a sustainable way?

This is the most important composite part of effectiveness assessment – combining an assessment of whether the NRSF, as it has been developed, is likely to meet the objectives that are outlined, to contribute to a realistic extent to solving issues faced by the Roma population, and to lead to sustainable outcomes and have long-term impact.

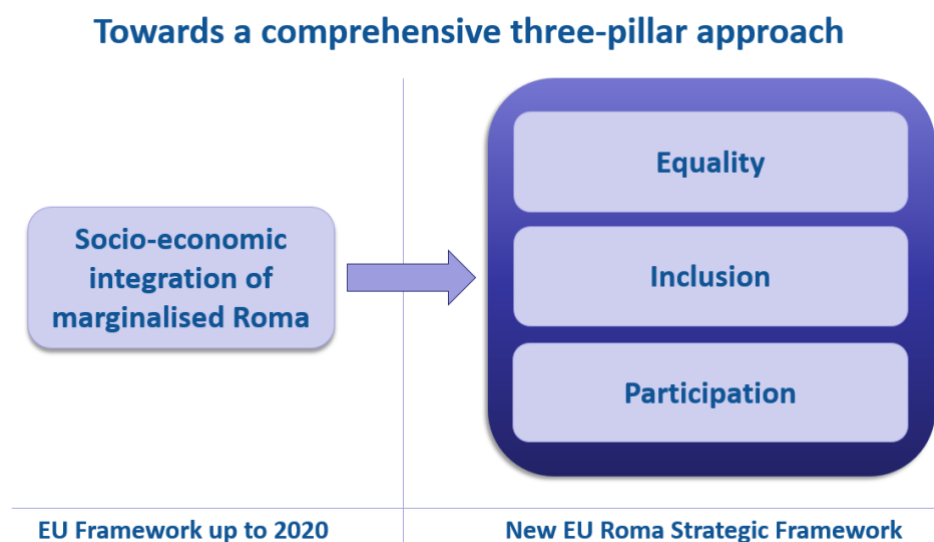
This summary assessment should consider:

1. views of stakeholders who have been interviewed for the monitoring report,
2. an analysis and synthesis by report authors based on their assessments of the NRSFs' coherence, allocation of responsibilities, planning, funding and monitoring and evaluation arrangements.

4. Alignment with the EU Roma Strategic Framework

The new 2020-2030 EU Roma Strategic Framework represents a significant shift in the way Roma inclusion is viewed by European institutions. Rather than integration, the focus has expanded to equality, inclusion and participation. This implies a shift in focus from the Roma's responsibility to integrate to the responsibility of the Member States to eliminate barriers to the equality, effective inclusion, and meaningful participation of the Roma.

The EU Roma Strategic Framework also explicitly acknowledges that the situation of Roma cannot be improved without dealing with antigypsyism and prejudice and discrimination against Roma.⁷



4.1. Does the NRSF focus on diversity among Roma?

The EU has come to emphasise the need to reflect the diversity of Roma communities, connected with the need to define specific targets and measures for several specific groups, and to be gender-responsive and sensitive to children and people of different age groups.

This reflects an intersectional approach that recognises that combinations of Roma ethnicity with other aspects of identity can lead to unique experiences of discrimination (e.g., Roma women may experience discrimination based on both their ethnicity and their gender, leading to a different experience to that of Roma men, who are also discriminated against on the basis of their ethnicity).

Key considerations:

Are specific groups of Roma with significant representation and specific problems explicitly mentioned in the NRSF, and associated with specific targets and measures?

The following table contains groups explicitly named in the EU Roma Strategic Framework and facilitates identification of whether they are relevant to the given country's situation and explicitly mentioned and addressed by targets (e.g., poverty reduction goals separately for Roma children, Roma of productive age, older Roma) and measures (e.g., specific programmes or provisions in mainstream programmes for older Roma or Roma with disabilities) in the NRSF:

⁷ Paraphrased from Monitoring & Reporting on the new EU Roma Framework High-Level Conference: Launch of the Strategic EU Roma Framework for Equality, Inclusion and Participation "Monitoring and reporting to enable policy learning", 12 October 2020, Intervention by Birgit Van Hout, Regional Representative for Europe, Office of the High Commissioner for Human Rights.

Specific Roma group	Represented in country and facing specific problems	Included in the NRSF	Specific targets and measures aimed at group included in NRSF
Children	[yes/no/not relevant]	[yes/not, specify]	[yes/not, specify]
Women
Roma youth			
Older Roma			
Roma with disabilities			
EU-mobile citizens			
Non-EU nationals			
Stateless Roma			
Roma LGBT+			

Are measures appropriately gender-responsive and child/age-sensitive?

Measures in various policy fields should take into account specific situation, needs and legitimate interests of various groups of population targeted by these measures. Such gender or age mainstreaming is needed, because policies and measures, which appear neutral, have in reality different outreach and effect on different age groups, or men/women (please, see textboxes “Application of gender aspects” in each policy chapter of the [RCM1’s guideline for the second monitoring cycle \(2018\)](#)). The NRSF should ideally make this gender/age mainstreaming explicit in all major policy measures.

4.2. Are measures mainstreamed where appropriate, in combination with explicit but not exclusive targeting?

The mainstreaming of measures focused on the Roma – making them part of mainstream policies towards vulnerable groups rather than using separate instruments – is seen as a way to make sure these measures do not promote integration at the expense of sustaining segregation.⁸

An example of a measure that lacks mainstreaming would be a scholarship programme for Roma children run by external (non-public) institutions. The same programme in a mainstreamed format would involve scholarships accessible to Roma children who need and can benefit from them as part of mainstream scholarship programs.

Explicit but not exclusive targeting means that some measures are explicitly aimed at some members of the Roma community due to their specific social, health, economic, cultural or other circumstances, but are also accessible to non-Roma who suffer from the same circumstances. This approach, in addition to being fair and equal, helps prevent

⁸ For a detailed explanation of explicit but not exclusive targeting and additional examples, see Principle no. 2 in Vademecum *The 10 Common Basic Principles on Roma Inclusion*, available at: <https://op.europa.eu/en/publication-detail/-/publication/7573706d-e7c4-4ece-ae59-2b361246a7b0>.

resentment about measures that could be perceived as only applicable to individuals of a specific ethnicity.

An example would be mobile health services provided to Roma living in segregated communities who lack practical access to mainstream health service providers which also provides outreach to other indigent people living in the same disadvantaged neighbourhood, regardless of ethnicity.

Key considerations:

Are measures focused on Roma in sector with responsibility of mainstream institutions owned by these mainstream institutions or separated into specific institutions?

Does the NRSF appropriately combine mainstreaming and explicit but not exclusive targeting?

The report on the implementation of national Roma integration strategies from 2019 recommended that targeted interventions be embedded in mainstream policy and legal frameworks to make sure they are temporary and promote access to mainstream services, rather than create permanent parallel structures specifically for Roma.

Do combined targeted and mainstream measures take into account specific local challenges and explicitly address barriers that deprive Roma of equal access to mainstream policies?

Vulnerable Roma populations often lack access to some mainstream policies in the key areas of the socio-economic inclusion of education, employment, health and housing as well as social services and new areas of concern associated with environmental justice and digital inclusion.

This can be due to geographic segregation, antigypsyism or discrimination against Roma, and infrastructural inequalities, or cultural and linguistic barriers.

Therefore, the NRSF should take these barriers into account explicitly, and review mainstream policies for eliminating these barriers and making policies equally accessible.

In Member States with a significant Roma population (Cluster 1), does the NRSF mainstream Roma equality and inclusion at regional and local levels?

4.3. Does the NRSF make use of the broad range of instruments introduced by the Council Recommendation?

The [Council Recommendations of 12 March 2021 on Roma equality, inclusion and participation](#) give examples of specific instruments for addressing all areas of focus. These examples are not presented as required measures, but reflect rights frameworks, experience, and examples of best practice.

In general, countries can deploy those options as appropriate, as supported by evidence from across the EU.

Key considerations:

Are best available measures employed across horizontal objectives, sectoral objectives, and other areas?

In areas where significant problems have been identified, review whether measures suggested by [Council Recommendations](#) (included as lettered lists) have been considered and implemented in the given Member State.

MONITORING REPORT TEMPLATE

The RCM monitoring reports will be European Union publications and thus require high-quality content and a unified structure and format. You will be provided with a template for the monitoring report that bears the visual markers of the European Commission, as well as the necessary disclaimers (indicating that, despite the fact that the report is a publication of the European Union, it only represents the views of the authors) and information on the RCM initiative. You should not modify the template and formatting. After the endorsement of the draft report by the European Commission, and before publication, an ISBN number will be added to the report.

You are requested to structure your monitoring report in line with the template included below. Please include in your report all chapters (one-digit level – e.g., “1.”) and sections (two-digit level – e.g., “1.1.”) as in the template. If the assessed category is not relevant for the country situation or data is currently missing, you may briefly comment that information was not available to answer the question, or make an assessment and explain the reasons behind it.

In each section, begin with a broad assessment that answers the key question to enable the reader to see the main conclusions straight away. Follow up with supporting arguments that refer to evidence from external sources or your own research.

The first RCM country reports (2022) must be concise: the European Commission may not accept draft reports exceeding **25 pages** per country (excl. Executive Summary, Additional Findings, References, and Annexes). It is expected that the length of the reports on the countries belonging to Clusters 1 and 2 will be close to this maximum limit, while those on countries belonging to Clusters 3 and 4 will be shorter.

You may illustrate the statements in your report by detailing specific examples in textboxes – this may make the report livelier and more credible. However, use these carefully as they may extend the text beyond the page limit.

*** BEGINNING OF TEMPLATE ***

Executive Summary

The executive summary should be written as the last part of the monitoring report. Please note that some readers will read only the executive summary – therefore the reader should find the most important points and conclusions summarised there. If the executive summary is well written, the chance that the reader will actually read the whole report are greater.

The executive summary should first include a general assessment of the post-2020 NRSF (main strengths and weaknesses, and observations on added value compared to the previous National Roma Integration Strategy until 2020) – i.e., a summary of the last chapter Conclusions and Recommendations. (Max. 2 paragraphs.)

It should then include four parts summarising the key findings, conclusion, and recommendations (please do not simply copy all recommendations from the last chapter, but rather try to generalise or highlight one or two of the most important ones) from each

of the four chapters (Participation, Relevance, Expected Effectiveness, Alignment with EU Roma Strategic Framework) that correspond to the evaluation criteria.

Introduction

The introduction to the monitoring report should briefly explain the context of the preparation of the report and the structure of authorship and consultation.

Process of the adoption of the new NRSF

In this section, please briefly summarise the state of the NRSF thus adopted and clarify if it is newly drafted, updated, or has been retained from the strategy for until 2020. Also indicate if the NRSF is, or is planned to be, followed by any action plan(s) that will operationalise or further detail objectives and measures. If so, and such an action plan is available, please include it into the assessment as part of the NRSF.

Further, briefly list the key milestones with short descriptions and dates: 1. when the NRSF was drafted, and when the consultations with stakeholders and the civil society took place; 2. when the NRSF was adopted by national authorities (and by which ones – was it adopted by the government only or was it presented/approved by parliament?); 3. when the NRSF was submitted to the European Commission.

Note any specifics of the adoption process that are relevant to the likelihood of the NRSF meeting its objectives and expectations, as outlined in the 2021 Council Recommendation and the EU Roma Strategic Framework.

If the new NRSF is not in place at time of monitoring and the time frame of the previous strategy has not been formally extended, mention what plans have been communicated regarding the next steps (timing), what official information on the forthcoming NRSF has been released, and what background information was provided in the process of data collection for the monitoring report.

About this monitoring report

Briefly explain the purpose of the report and its structuring according to the four key monitoring criteria, followed by recommendations for different stakeholders.

Then describe the methodology involved in the development of the monitoring report, including the how data was collected – for example:

- summarise the number and type of respondents with who you have conducted key informant interviews (do not list them in this section) to establish the credibility of the monitoring reports (e.g., specify how many interviews were carried out with representatives of the national Roma contact point, different ministries, or other representatives of public administration),
- describe which CSOs or experts were consulted, how (e.g., through online discussions, in-person meetings or other), and when,
- detail what documents were reviewed (focus on those which are more recent – if possible, published within the last 2-3 years – and highly relevant),
- describe additional forms of data collection that were carried out (such as online questionnaires) as well as any significant validation activities (e.g., if a draft of the report was shared with a number of representatives of CSOs or experts who provided comments and feedback);

and how and by whom the data was analysed to answer the monitoring questions.

Finally, indicate the authorship of the report – you can indicate the individuals who wrote the report, or denote its institutional authorship (a specific CSO or a group of CSOs). If appropriate, the introduction can also thank stakeholders (responders, reviewers, or commenters) who have contributed to the quality of the monitoring report.

General guidance on the content of the four sections of the monitoring report covering the monitoring criteria: 1. Participation, 2. Relevance, 3. Expected Effectiveness, 4. Alignment with EU Roma Strategic Framework

All reports should seek to answer the monitoring questions, but the depth and length of responses will differ significantly depending on the cluster the country belongs to and the specific problems relevant to its Roma communities.

The monitoring questions are supported by additional, deeper questions that we refer to as “key considerations”. Of these you should only address those that are relevant to your country situation. Those that do not apply do not need to be responded to or included in the structure of country monitoring reports.

1. Participation

- 1.1. Roma participation in the preparation of the NRSF
- 1.2. Roma participation in the implementation, monitoring, and evaluation of the NRSF
- 1.3. System of policy-relevant consultation that is in place with Roma and pro-Roma civil society and other relevant stakeholders
- 1.4. Empowerment of Roma communities at the local level
- 1.5. Capacity-building of Roma civil society

2. Relevance

(Do include all nine subsections that cover all the policy areas that are identified)

- 2.1. Fighting antigypsyism and discrimination
- 2.2. Education
- 2.3. Employment
- 2.4. Healthcare
- 2.5. Housing, essential services, and environmental justice
- 2.6. Income support (social protection)
- 2.7. Social services
- 2.8. Child protection
- 2.9. Promoting (awareness of) Roma arts, culture, and history

(Tables detailing problems and conditions will not be included as part of the main text but will be located in Annex I; you can refer to them here.)

Each section of this chapter (which covers the thematic fields listed below) should be structured as follows:

Start with a brief overall assessment of whether the country faces significant problems in this area, and whether the latter are identified in the NRSF and addressed by specific measures formulated in the NRSF (or its action plan).

Then review the 1-3 most critical specific problems and provide context on them, their treatment in the strategy, and the presence of measures and targets.

3. Expected Effectiveness

- 3.1. Coherence with related domestic and European policies and activities
- 3.2. Responsibility for NRSF coordination and monitoring
- 3.3. Quality of the plan
- 3.4. Funding
- 3.5. Monitoring and evaluation
- 3.6. Assessment of the expected effectiveness and sustainability

4. Alignment with the EU Roma Strategic Framework

- 4.1. Reflecting diversity among Roma
- 4.2. Combining mainstream and targeted approaches
- 4.3. Active participation of Roma and Roma ownership

Additional findings

This section is intended to include any additional findings or recommendations that do not fit well into the structure of the report but which have arisen in the course of research and analysis for the monitoring report and the authors consider worth noting.

Conclusions and recommendations

This section should include a brief summary of the main strengths and weaknesses of the NRSF and its added value compared to the previous National Roma Integration Strategy valid until 2020.

A limited number (approx. 10-12 for Cluster 1 countries, 8-10 for Cluster 2, 5-8 for Cluster 3, 1-5 for Cluster 4) of key recommendations, based on findings described in the report, should be presented here. The recommendations should be structured in line with who the recommendations are addressed to. Likely addressees of the recommendations are:

1. national authorities, further broken down into specific institutions, as appropriate (government, National Roma Contact Point, line ministries, authority responsible for statistics, ...),
2. European institutions (mainly the European Commission – ideally, specify to which Directorate-General –, the Fundamental Rights Agency, or others),
3. civil society organisations,
4. other actors (public and private, such as media).

Recommendations should be sufficiently specific to allow for monitoring of their implementation. When possible they should include indicators – not necessarily

quantitative ones but qualitative or process indicators (e.g., “Prepare and approve a plan for combatting online hate speech by 2023” rather than “Address problems of online hate speech as soon as possible”).

References

This section should provide:

1. A list of interviews with dates and details of the format in which they were carried out (in person, video, telephone, email), as well as details of group interviews and focus groups. Interviews in which the interviewee requested anonymity should be included too (with the name anonymised; indicate only the interviewee’s general affiliation – e.g., “representative of the Ministry of Labour”, or at least “representative of a ministry”).
2. List of all documents reviewed and consulted, including links to online versions where available.

Annex I – Problems and considerations by policy area

This annex should contain the tables with problems and conditions related to the chapter Relevance – please copy and fill the tables from Annex I. of this guideline.

Additional annexes

If you collect other relevant detailed information that will not fit into the main body of the report or would be too detailed, you may include it in additional annexes.

*** END OF TEMPLATE ***

REFERENCES

[Communication from the Commission to the European Parliament and the Council "A Union of equality: EU Roma strategic framework for equality, inclusion and participation"](#).

[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"](#).

[Commission staff working document "Evaluation of the EU framework for national Roma integration strategies up to 2020 accompanying the document Communication from the Commission to the European Parliament and the Council 'Report on the evaluation of the E](#)

[Council recommendation of 12 March 2021 on Roma equality, inclusion and participation \(2021/c 93/01\)](#).

European Network for Roma Inclusion under ESI Funds (2021). [Checklist for the Effective Inclusion of Roma interventions within EU Cohesion Funds programming 2021-2027](#).

EVALSED. (2013). [The resource for the evaluation of Socio-Economic Development](#).

Fresno, J., Lajčáková, J., Szira, J., Mačáková, S., Karoly, M. and Rossi, M. (2019). [A meta-evaluation of interventions for Roma inclusion](#). Publications Office of the European Union, Luxembourg.

Samsset, K., Christensen, T. (2017). [Ex Ante Project Evaluation and the Complexity of Early Decision-Making](#), Vanclay, R. (2012). [Guidance for the design of qualitative case study evaluation A short report to DG Regio](#).

[Vademecum The 10 Common Basic Principles on Roma Inclusion](#). Public Organization Review 17, 1-17.

Van Hout, B. (2020). [Monitoring & reporting on the new EU Roma Framework](#). Intervention at High-Level Conference: Launch of the Strategic EU Roma Framework for Equality, Inclusion and Participation "Monitoring and reporting to enable policy learning".

ANNEX I – LIST OF PROBLEMS AND CONDITIONS IN THEMATIC FIELDS (FOR ASSESSMENT OF THE RELEVANCE CRITERION)

All tables below should be included in each country report (in annex).

2.1. Fighting antigypsyism and discrimination

The European Commission, in the EU Roma Strategic Framework, stresses the need for a clear focus on equality, which should be reflected not only in maintaining the fight against discrimination and antigypsyism as key objectives, but also on making the focus on equality a cross-cutting priority in each policy area.

Antigypsyism has been highlighted as a critical issue by the European Parliament and by the EU Fundamental Rights Agency (FRA). Antigypsyism is a particular form of discrimination against Roma, commonly manifested in hate speech, hate crime, and ethnic profiling by law enforcement agencies. The EU Roma Strategic Framework defines it as follows: "Antigypsyism is a form of racism against Roma. It is a historically rooted structural phenomenon that appears at institutional, social and interpersonal levels. It has its origins in how the majority views and treats those considered 'gypsies'. It is rooted in a process of 'othering' that builds on negative as well as positive, exoticising stereotypes. While there is consensus about the understanding of antigypsyism among proponents of the need to reinforce the fight against it, there has been a debate about the term and its appropriate use in different national contexts".

The European Commission provides the example of having national anti-racism action plans and specific measures such as community building between Roma and non-Roma, non-discrimination and Roma inclusion training for public officials, and making Roma history and culture part of school curricula.⁹

Member States with significant Roma population (Clusters 1 and 2) should have a plan or set of measures for preventing and fighting antigypsyism and discrimination, segregation in education and housing, and anti-Roma prejudices and stereotypes (including online). These plans should include as a minimum the collection of data about complaints filed by Roma with equality bodies and other public authorities, including the police (especially in the case of hate crimes).

⁹ Examples are listed in the document "Report on the evaluation of the EU Framework for National Roma Integration Strategies up to 2020", available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52018DC0785>

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
	irrelevant, minor problems, significant problems, critical problems	irrelevant, mentioned but not analysed sufficiently, understood with limitations, identified and analysed sufficiently	absent, present but insufficient, adequate but with room for improvement, appropriate	absent, some targets but not relevant, adequate but with room for improvement, relevant targets well defined
Antigypsyism not recognised as a specific problem in national policy frameworks				
Prejudice against Roma				
Hate crimes against Roma				
Hate speech towards and against Roma (online and offline)				
Weak effectiveness of protection from discrimination ¹⁰				
Segregation in education, housing, or provision of public services				
Forced evictions and demolitions leading to homelessness, inadequate housing, and social exclusion				
Statelessness, missing ID documents				
Misconduct and discriminatory behaviour by police (under-policing/under-policing)				
Barriers to <i>de facto</i> exercise of EU right to				

¹⁰ Despite the antidiscrimination law that is in place, people may face barriers (both internal, such as a lack of awareness or resources; or external, such as complicated administrative rules) in benefiting from it. Therefore, diverse measures may be adopted to facilitate people's access to protection from discrimination: the right to file a complaint with the equality body or the courts in the public interest (i.e., a CSO files the complaint instead of individual victims of discrimination); free-of-charge legal advice/aid from the equality body or other public authority or CSO receiving public funding for this purpose; or complaints investigated by the equality body.

It may be that the anti-discrimination law is not enforced well enough to reduce discrimination. Therefore, it is important to assess whether effective, proportionate, and dissuasive sanctions are applied in cases of discrimination and whether rulings that establish discrimination are enforced effectively.

free movement				
Other country-specific issues not listed above (please extend the table with new rows)				

2.2. Education

The 2020 EU Roma Strategic Framework states that education is the area of Roma inclusion that has progressed the most, notably by reducing early school-leaving and improving participation in early childhood education and compulsory schooling. However, in terms of education significant gaps between Roma and the general population persist. Therefore, the EU Roma Strategic Framework requests an increase in Roma's equal access to quality inclusive mainstream education to ensure that by 2030 the majority of Roma youth complete upper secondary education at least.

Despite the stated progress in some areas of education, cases of segregation of Roma pupils in education have increased in many countries. The reduction of educational segregation should be among the priorities of the member states where this problem exists. Therefore, such member states must fulfil an "enabling conditionality" to become eligible to use finances provided by the ESF+ (see Annex III of the [Common Provision Regulation \(CPR\)](#) concerning the 2020-2027 programming period): their NRSF must include an evidence-based diagnosis of educational segregation and measures to prevent and fight it. Moreover, the CPR excludes the financing of any activities that contribute to segregation.

Digital inclusion is another important objective to be addressed through interventions in the field of education: it concerns both the development of digital literacy (the skills and competences necessary for using the online public and commercial services; for more details see the [Digital Competences for Citizens Framework](#)), and access to and support for online and distance learning (particularly important if education and training institutions close, as during the coronavirus pandemic).

For more information on education, please see training materials from RCM1:

- ["Guidelines for NGOs on preparing civil society monitoring reports \(second cycle, 2018\): Assessing the progress in four key policy areas of the strategy"](#);
- a [video presentation](#) from the RCM workshop on 24 April 2018 by Marko Pecak.

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
	irrelevant, minor problems, significant problems, critical problems	irrelevant, mentioned but not analysed sufficiently, understood with limitations, identified and analysed sufficiently	absent, present but insufficient, adequate but with room for improvement, appropriate	absent, some targets but not relevant, adequate but with room for improvement, relevant targets well defined
Lack of available and accessible pre-school education and ECEC services for Roma				
Lower quality of pre-				

school education and ECEC services for Roma				
High drop-out rate before completion of primary education				
Early leaving from secondary education				
Secondary education/vocational training disconnected from labour market needs				
Misplacement of Roma pupils into special education				
Education segregation of Roma pupils				
Increased selectivity of the educational system resulting in concentration of Roma or other disadvantaged pupils in educational facilities of lower quality				
Limited access to second-chance education, adult education, and lifelong learning				
Limited access to and support for online and distance learning if education and training institutions close, as occurred during the coronavirus pandemic				
Low level of digital skills and competences and limited opportunities for their development among pupils				
Low level of digital skills and competences and limited opportunities for their development among adults				
Other country-specific issues (extend the table as needed)				

2.3. Employment

In the last ten years Roma's access to employment has not improved, and the share of Roma youth not in employment, education, or training has even increased. Therefore, the new EU Roma Strategic Framework calls for increasing Roma's equal access to quality and sustainable employment and to ensuring that gaps in employment are cut by half by 2030:

- at least 60% of Roma should be in paid work,
- at least 45% of Roma women should be in paid work, and
- no more than one in three Roma youths should be 'not in education, employment, or training' (NEET).

These targets are to be achieved through the improvement of education, development of digital skills, support with the transition from education to employment, the fight against discrimination and antigypsyism on the labour market, employment support especially targeted at Roma youth, Roma women, and EU-mobile Roma, and other measures suggested in the 2021 Council Recommendation.

For more information on employment, please see training materials from RCM1:

- ["Guidelines for NGOs on preparing civil society monitoring reports \(second cycle, 2018\): Assessing the progress in four key policy areas of the strategy"](#);
- a [video presentation](#) from the RCM Workshop on 24 April 2018 by Ágota Scharle.

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
	irrelevant, minor problems, significant problems, critical problems	irrelevant, mentioned but not analysed sufficiently, understood with limitations, identified and analysed sufficiently	absent, present but insufficient, adequate but with room for improvement, appropriate	absent, some targets but not relevant, adequate but with room for improvement, relevant targets well defined
Poor access to or low effectiveness of public employment services				
Youth not in employment, education or training (NEET)				
Poor access to (re-) training, lifelong learning and skills development				
Discrimination on the labour market by employers				
Risk for Roma women and girls from disadvantaged areas of being subjected to trafficking and forced prostitution				
Primary labour market opportunities substituted by public				

work				
Barriers and disincentives to employment (such as indebtedness, low income from work compared to social income)				
Lack of activation measures, employment support				
Other country-specific issues (extend the table as needed)				

2.4. Healthcare

Despite the fact that the self-perceived health status of Roma has improved, their medical coverage remains limited and the extreme impact of COVID-19 on Roma has revealed serious gaps in access to and the quality of healthcare services, health conditions, and persisting discrimination.

The gap in life expectancy at birth between Roma and the general population in Europe is huge (10.4 years), and the new EU Roma Strategic Framework calls for its reduction at least by half. To achieve this objective, the Council recommends that member states ensure equal access without barriers to quality healthcare and social services, especially for those groups that are most at risk or those living in marginalised or remote localities, mainly through the promotion and facilitation of preventive care and primary care, and fighting discrimination and segregation in healthcare.

For more information on healthcare, please see the following training materials from RCM1:

- ["Guidelines for NGOs on preparing civil society monitoring reports \(second cycle, 2018\): Assessing the progress in four key policy areas of the strategy"](#);
- a [video presentation](#) from the RCM workshop on 24 April 2018 by Balázs Váradi.

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
	irrelevant, minor problems, significant problems, critical problems	irrelevant, mentioned but not analysed sufficiently, understood with limitations, identified and analysed sufficiently	absent, present but insufficient, adequate but with room for improvement, appropriate	absent, some targets but not relevant, adequate but with room for improvement, relevant targets well defined
Exclusion from public health insurance coverage (including those who are stateless, third country nationals, or EU-mobile)				

Poor supply/availability of healthcare services (including lack of means to cover out-of-pocket health costs)				
Limited access to emergency care				
Limited access to primary care				
Limited access to prenatal and postnatal care				
Limited access to health-related information				
Poor access to preventive care (vaccination, check-ups, screenings, awareness-raising about healthy lifestyles)				
Poor access to sexual/reproductive healthcare and family planning services				
Specific barriers to better healthcare of vulnerable groups such as elderly Roma people, Roma with disabilities, LGBTI and others				
Discrimination/ antigypsyism in healthcare (e.g., segregated services, forced sterilisation)				
Unrecognised historical injustices, such as forced sterilisation				
Inequalities in measures for combating and preventing potential outbreaks of diseases in marginalised or remote localities				
Other country-specific issues (extend the table as needed)				

2.5. Housing, essential services, and environmental justice

Many Roma still lack adequate housing¹¹ and residential segregation persists due to widespread discrimination, intentional political and administrative decisions driven by antigypsyism, as well as economic and demographic forces. Segregation has negative impacts on access to mainstream quality services (including education, healthcare, transportation) and the labour market. Bad housing conditions and a lack of infrastructure negatively affect health. Therefore, the EU requests that member states improve the Roma's access to adequate desegregated housing and essential services (as in other areas, the Council Recommendations offers a series of measures and principles).

The reduction of residential segregation should be among the priorities of member states where this problem exists. Therefore, such member states must fulfil an "enabling conditionality" to be eligible to use finances provided by the ESF+ (see Annex III of the [Common Provision Regulation \(CPR\)](#) concerning the 2020-2027 programming period): their NRSFs must include an evidence-based diagnosis of residential segregation and measures to prevent and fight it. Moreover, the CPR excludes the financing of any activities that contribute to residential segregation.

This field includes also ensuring environmental justice, as many Roma suffer from environmental discrimination (see: [Pushed to the wastelands: environmental racism against Roma communities in central and Eastern Europe](#)). Because of the lack of other options, Roma are forced to live in environmentally hazardous conditions – next to waste dumps, abandoned industrial sites, or flood-prone areas, or in areas without developed infrastructure or access to water and sanitation – all of which have a negative health impact. The lack of broadband internet access in Roma neighbourhoods is one of the causes of digital exclusion that impacts education and other public services, as well as work opportunities.

For more information on housing, please see the training materials from RCM1:

- ["Guidelines for NGOs on preparing civil society monitoring reports \(second cycle, 2018\): Assessing the progress in four key policy areas of the strategy"](#);
- a [video presentation](#) from the RCM workshop on 24 April 2018 by Nóra Teller.

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
	irrelevant, minor problems, significant problems, critical problems	irrelevant, mentioned but not analysed sufficiently, understood with limitations, identified and analysed sufficiently	absent, present but insufficient, adequate but with room for improvement, appropriate	absent, some targets but not relevant, adequate but with room for improvement, relevant targets well defined
Poor physical security of housing (ruined or slum housing)				
Lack of access to drinking water				
Lack of access to				

¹¹ The [concept of adequate housing](#) includes: legal security of tenure; availability of services, materials and infrastructure; affordability; habitability; accessibility; adequate location and cultural adequacy.

sanitation				
Lack of access to electricity				
Limited or absent public waste collection				
Restricted heating capability (families unable to heat all rooms/all times when necessary) or solid waste used for heating				
Lack of security of tenure (legal titles are not clear and secure)				
Lacking or limited access to social housing				
Overcrowding (available space/room for families)				
Housing-related indebtedness at levels which may cause eviction				
Housing in segregated settlements/ neighbourhoods				
Housing in informal or illegal settlements/ neighbourhoods				
Exposure to hazardous factors (living in areas prone to natural disasters or environmentally hazardous areas)				
Limited or lacking access to public transport				
Limited or lacking internet access (e.g., public internet access points in deprived areas, areas not covered by broadband internet)				
Limited or lacking access to green spaces				
Roma excluded from environmental democracy				
Other country-specific issues not listed above				

(please extend the table with new rows)				
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2.6. Income support (social protection)

EU member states support the income of citizens by transferring money and benefits in kind (e.g., school lunches or vouchers) that target different social groups. They usually aim to ensure a minimum standard of living for individuals and their dependents when they have no other means of financial support (minimum income schemes), and are often associated with conditions related to job searching.

They are an essential (but not the only or necessarily most important) instrument in EU countries for sustaining income, reducing poverty, and decreasing inequalities. There is considerable variance across member states in terms of how accessible and how generous their income protection schemes are: the conditions of entitlement can be different as well as the mechanisms of establishing the level of benefits, in addition to which level of the state disburses them, and how the income protection scheme fits into the broader framework of social programmes. Actual access to these schemes and how they are administered may differ when it comes to disadvantaged or discriminated-against social groups.

Here we do not consider insurance-based provisions for the unemployed, the retired (pensions), or those living with disabilities. Instead, we focus on family and child benefits and transfers to low-income households with at least one working-age member. In some countries several small allowances target various subgroups among low-income families: in such cases, please focus on a limited number of allowances that are most relevant to the Roma. In some countries, provisions vary greatly by region or municipality: in such cases, please focus on selected regions that are typical of the areas where most of the Roma live.

Problems and conditions	Significance: irrelevant, minor problems, significant problems, critical problems	Identified by strategy: irrelevant, mentioned but not analysed sufficiently, understood with limitations, identified and analysed sufficiently	Measures to address: absent, present but insufficient, adequate but with room for improvement, appropriate	Targets defined: absent, some targets but not relevant, adequate but with room for improvement, relevant targets well defined
High at-risk-of-poverty rate and material and social deprivation				
Income support programmes fail to guarantee an acceptable level of minimum income for every household				
Limited access to income support schemes (low awareness, barrier of				

administrative burdens, stigma attached)				
Ineffective eligibility rules (well-designed means-testing ensures that those who need support can get it; job-search conditions ensure the motivation for returning to work)				
Low flexibility of income support programmes for addressing changing conditions of the household				
Discrimination by agencies managing income-support programmes				
Risk of municipalities misusing income support to buy votes				
Other country-specific issues not listed above (please extend the table with new rows)				

2.7. Social services

Social services do not have a universally accepted definition. Here we mean the essential services provided by public agencies (managed or financed by the central or local government) that play a preventive and social-cohesion role and that consist of customised assistance that facilitates social inclusion and safeguards fundamental rights. They comprise early childcare (not included in the education chapter), counselling, and other services for persons who face personal challenges or crises (such as debt, unemployment, alcohol or drug addiction, or family breakdown, including crises such as domestic violence, unwanted pregnancy, prostitution, juvenile crime, etc.). Other “enabling” services that are aimed at improving employability (e.g., vocational rehabilitation and training or language training for immigrants) should be covered in the employment chapter. To keep the categories manageable, we suggest that customised services for the oldest members of society, activities aimed at integrating persons with long-term health or disability problems, and issues related to social housing (albeit usually meant to be included in social services), should *not* be considered here.

Across Europe, many of these services are combined and provided by different actors (centralised agencies, local government, not-for-profits, or church-affiliated professionals) at rather different levels of intensity and professionalism, based on different entitlements, and using different methods.

Availability, access, affordability, service quality, and respect for clients’ rights can be issues. Service take-up is a recurrent problem with respect to social services: does everyone who needs these services receive them? If not, why not? This issue may especially affect disadvantaged, excluded, or discriminated social groups.

Problems and conditions	Significance: irrelevant, minor problems, significant problems, critical problems	Identified by strategy: irrelevant, mentioned but not analysed sufficiently, understood with limitations, identified and analysed sufficiently	Measures to address: absent, present but insufficient, adequate but with room for improvement, appropriate	Targets defined: absent, some targets but not relevant, adequate but with room for improvement, relevant targets well defined
Limited quality, capacity and comprehensiveness of help provided by social services				
Limited access to social services: low awareness of them, low accessibility, (e.g., due to travel costs) or limited availability				
Services providers do not actively reach out to those in need				
Limited ability of social services to effectively work together with other agencies (e.g., public employment service) to help clients				
Discrimination by social service providers				
Lack of adequacy of programmes for addressing indebtedness (providing counselling and financial support)				

2.8. Child protection

A Child Protection System (CPS) is a set of laws, policies, regulations, and services needed across all social sectors.¹² A functioning CPS has the following features:

- It responds to **Human Rights** obligations, particularly the UN Convention on the Rights of the Child Articles 3 and 19, and the Charter of Fundamental Rights of the European Union, Article 24.
- It is **integrated** in the sense that *it works across sectors and government departments* – namely, social welfare, education, health, security, and justice. Running a CPS from one of the respective ministries often fails because it fails to make the different logics (caring, policing, educating, curing) interact.

¹² UNICEF 2020: *Child Protection Strategy 2021-2030*, available at: <https://www.unicef.org/documents/child-protection-strategy>.

- It works in **prevention and response**. The related activities can be structured in terms of primary prevention (for the general population), secondary prevention (for children perceived to be at risk), or tertiary prevention (intervention/response for children that have been exposed to risks).
- CPSs entail **state, society, and community**. While the obligation to respect, protect, and promote the right of the child lies with the state, any CPS necessarily has to involve nongovernmental actors and the community. The primacy of parental responsibility is key, and fostering parenting skills a main avenue of intervention.¹³
- One way to structure thinking about CPS is to define their **elements** as (1) laws and policy, (2) governance, (3) services (both prevention and response), (4) oversight and monitoring, (5) human and financial resources, and (6) participation.¹⁴

It is important to avoid the common practice of conflating two systems: social services and social protection. **Social services** are personalised services aimed at helping persons overcome crises during the life cycle or strengthening and maintaining autonomy and capabilities. **Social protection (income support)** involves state-run schemes of redistribution based on financial transfers or benefits that ensure certain minimum incomes. Both systems interact with the CPS, but they are not the same.

Any CPS has amongst its main concerns the following three issues:

- **Violence against children (VAC):** this entails both physical, emotional, and sexualized violence and neglect, and can be structured by place – namely, home, educational settings/schools, community (i.e., in the streets, in public spaces, etc.), medical, rehabilitation and care facilities, working places, custody/detention centres, and digital spaces and platforms. VAC also includes: child labour, child trafficking and harmful practices and early marriage.
- **Children without parental care.** Children in state care need special protection. Over the last decades the formerly widespread model of large-scale institutions (particularly employed in Eastern-European countries) has largely been replaced by family-type arrangements (*deinstitutionalisation*). The European consensus, in line with international obligations, foresees the removal of children from their parents' custody as a measure of last resort.
- **Children in conflict with the law.** The systems of policing, detention, judiciary, and correction need to respect the rights of the child. Increasingly, diversion and alternatives to punitive approaches, such as restorative justice, are being promoted as forward-looking responses in the majority of European countries.¹⁵ In general, the minimum age of criminal responsibility (MACR) varies amongst member states but is converging at 15 years.¹⁶

¹³ UNICEF 2021: *Vision for Elevating Parenting*, available at: <https://www.unicef.org/documents/unicefs-vision-elevating-parenting>.

¹⁴ UNICEF 2021: *Scaling up Child Protection: A Framework for the Future*, available at: <https://www.unicef.org/documents/scaling-child-protection-framework-future>; UNICEF 2018: *Strengthening Child Protection Systems: Evaluation of UNICEF Strategies and Programme Performance – Final report*, available at: https://www.unicef.org/evaldatabase/index_103557.html; UNICEF 2017: *Preventing and Responding to Violence Against Children and Adolescents Theory of Change 2017*, available at: <https://www.unicef.org/documents/preventing-and-responding-violence-against-children-and-adolescents-theory-change>

¹⁵ European Forum for Restorative Justice (EFRJ) and Terre des Hommes in Europe (Tdh) 2020: Joint Position Paper on the EU Strategy on the rights of the child (2021-2024), available at: <https://www.euforumrj.org/en/restorative-justice-and-child-justice>

¹⁶ FRA (2017). Children's rights and justice – Minimum age requirements in the EU, available at: <https://fra.europa.eu/en/publication/2017/mapping-minimum-age-requirements-concerning-rights-child-eu>

One specific issue is the right to birth registration, which affects relatively few individuals; however, with highly detrimental consequences.¹⁷

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
	irrelevant, minor problems, significant problems, critical problems	irrelevant, mentioned but not analysed sufficiently, understood with limitations, identified and analysed sufficiently	absent, present but insufficient, adequate but with room for improvement, appropriate	absent, some targets but not relevant, adequate but with room for improvement, relevant targets well defined
Child protection not considered in the NRSF				
Specific vulnerability of Romani children as victims of violence not considered				
Segregated or discriminatory child-protection services provided to Roma				
Activities aimed at strengthening parental responsibility and skills not available or not reaching out to Roma parents				
Illegal practices of child labour				
Large-scale and discriminatory placement of Romani children in early childhood care institutions				
Persistence of large-scale institutions rather than family-type arrangements				
Early marriages				
Barriers to children's registration; statelessness				
Biased treatment of Roma youth by security and law enforcement				

¹⁷ <https://www.unicef.org/reports/birth-registration-every-child-2030>

Inadequate child/adolescent participation				
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2.9. Promoting (awareness of) Roma arts, culture, and history

The transversal, horizontal objective of fighting antigypsyism is divided into two sub-objectives: combatting, and prevention. Combatting antigypsyism – the horizontal priority – provides us with the definition of the problem. Prevention recognises that we need to act before manifestations of antigypsyism emerge. To do so effectively, we cannot combat antigypsyism without rich cultural munitions that include a positive vision, wherein an effective counter-narrative and strong counter-representation are a must.

To this end, within the frame of the EU Roma Strategic Framework the European Commission supports and calls upon Member States to support activities that promote positive narratives and Roma role models, combat negative stereotypes, raise awareness on Roma history and culture, and promote truth and reconciliation: “Roma art, history and culture are integral features of our European and national landscapes. However, over centuries, portrayals of Roma culture and identity have been romanticised and stereotyped, and this has exacerbated the alienation of Roma communities from mainstream societies. Cultural recognition should be built through Roma narratives”.

To effectively assess to what extent Members States are committed to promoting and raising awareness of Roma arts, culture and history, it is necessary to take into account the explicit inclusion of initiatives dedicated to this purpose in the national strategies.

Furthermore, the Fundamental Rights Agency (FRA) includes a detailed set of indicators for monitoring and measuring the implementation and impact of the new EU Roma Strategic Framework in terms of fighting and preventing antigypsyism. These should also be considered when assessing the NRSF design and implementation.

Problems and conditions	Significance: irrelevant, minor problems, significant problems, critical problems	Identified by strategy: irrelevant, mentioned but not analysed sufficiently, understood with limitations, identified and analysed sufficiently	Measures to address: absent, present but insufficient, adequate but with room for improvement, appropriate	Targets defined: absent, some targets but not relevant, adequate but with room for improvement, relevant targets well defined
Poor or lacking awareness of the general population of the contribution of Roma art and culture to national and European heritage				
Exclusion of Roma communities from national cultural narratives				
Romani history and culture not included in				

school curricula and textbooks for both Roma and non-Roma students				
Lack of inclusion of Romani language in schools, and development of necessary educational materials and resources for Romani language preservation and teaching				
Lack of memorialization of Roma history through establishing monuments, commemorative activities, and institutionalizing dates relevant to Roma history				
Other country-specific issues not listed above (please extend the table with new rows)				

ANNEX II – INTERVIEW QUESTIONS MATRIX

Introduction:

Hello, my name is ... and I represent the organisation This is my colleague

We are part of an EU-wide initiative called the Roma Civil Monitor 2021-2025, which is financed by the European Commission and implemented by a consortium led by Central European University (CEU) and involving Roma civil society organisations from all EU Member States.

Our task is to help collect feedback from Roma civil society and a variety of experts and officials to increase the chance that our national strategies will lead to desirable changes. The European Commission will review our report as one of the inputs when analysing the national Roma strategies.

We are interviewing you and people from a variety of public institutions and CSOs who represent different parts of society and diverse groups of Roma to get a realistic picture and reliable information.

We would like to ask for your consent for the recording of this interview only to make sure we do not miss anything important. We will not publish or share this recording anywhere. Is this OK?

Thank you very much!

Which respondents should the question be asked of?	Question	Additional Questions (probing)	What parts of the monitoring report does it inform?
National Roma Contact Point (NRCP)	Could you walk us through the structure of the strategy and give us your remarks about the key parts?		
Participation			
Roma CSOs and activists Public authorities with responsibility in key areas National equality body Regional and local authorities in key regions	How have you been involved in the development of the strategy?	At what points of the preparation were you involved? Who did you communicate with about the strategy? Is there anyone whose involvement you think would have been useful (but who was not consulted)? What did the consultation process look like? Did you make any suggestions, and how were they received?	1.1, 3.2

NRCP	How was the strategy up to 2020 evaluated?	Who was involved in the evaluation? Are you familiar with the results and recommendations? Are there any lessons that have not been learned in your view?	
NRCP Roma CSOs and activists	What Roma individuals and organizations are involved with the NRSF?	Are there any Roma individuals or CSOs involved in implementation? How specifically? What activities do you think would help build the capacity of Roma civil society and experts? Are these activities part of the strategy?	1.2
NRCP Roma CSOs and activists	What are the official monitoring and evaluation arrangements for the NRSF?	Are there any Roma individuals or CSOs involved in monitoring and in evaluation plans? How, specifically? How are Roma involved in EU fund programming?	1.2, 1.3
Roma CSOs and activists	Are Roma part of the staff and paid experts at institutions involved in the NRSF?	What is the situation like with respect to local government, regional government, and other public institutions? How are Roma involved in EU fund programming? How would you go about getting more Roma involved at the central level? How about at the local and regional level?	1.2, 1.3, 1.4
NRCP Roma CSOs and activists Public authorities with responsibility in key areas	How are Roma and pro-Roma organizations consulted about policies that concern the Roma?	Are there different subgroups of Roma involved in these processes – for example women, young people, older people, sexual minorities, or disabled people?	1.3
Relevance			
NRCP Roma CSOs and activists (depending on focus and expertise)	We have identified nine policy areas that most affect the Roma.	What do you see as the most critical challenges affecting the Roma in country XXX in this area?	2.1-2.9, 3.1, 4.4

<p>Public authorities with responsibility in key areas</p> <p>Public authorities in charge of statistics</p> <p>Academics, experts, analysts, international organisations, donors, diplomats</p> <p>Regional and local authorities in key regions</p>	<p>I would like to ask for your views about some of them. I will ask about them one by one.</p> <p>I am interested in what you see as the main problems and whether the NSRF addresses them.</p> <p>Fighting antigypsyism and discrimination</p> <p>Education</p> <p>Employment</p> <p>Healthcare</p> <p>Housing, essential services and environmental justice</p> <p>Social services</p> <p>Child protection</p> <p>Income support</p> <p>Promoting (awareness of) Roma arts, culture and history</p>	<p>In your view, does the NRSF identify and analyse these challenges properly?</p> <p>What do you see as the most useful measures in the NRSF in this area?</p> <p>Are there any other measures you would consider beneficial?</p> <p>Are there any resources or documents that could provide us with more relevant information on this area?</p> <p>How does the NRSF connect with other policy documents in the country and the EU that you think are important in this area?</p> <p>Which other policies need to be updated to make the NRSF more successful, in your view?</p> <p>The European Council has recommended many specific potential measures in this area. I would like to review these with you and get your feedback on whether they are used or could be useful for country XXX. (use Council Recommendation recommendations in the area marked a), b), c), ...)</p>	
<p>Public authorities in charge of statistics</p> <p>Public authorities with responsibility in key areas</p> <p>Academics, experts, analysts, international organisations, donors, diplomats</p>	<p>What kind of data are used in this area?</p>	<p>What is the quality of this data, in your opinion?</p> <p>What other data sources could be used in your view?</p> <p>How would you recommend collecting more useful statistical data?</p>	<p>2.1 - 2.9</p>
<p>Effectiveness</p>			
<p>NRCP</p> <p>Public authorities with responsibility in key areas</p> <p>Academics, experts, analysts, international</p>	<p>What is the institutional set up like regarding the implementation of the NRSF?</p>	<p>What is the NRCP's standing in the public administration?</p> <p>Is there any authority it needs but lacks in your view?</p>	<p>3.2</p>

<p>organisations, donors, diplomats</p> <p>Regional and local authorities in key regions</p>		<p>How many staff there deal with the NRCP?</p> <p>Are there enough people to work on all the areas that are needed?</p>	
<p>NRCP</p> <p>Public authorities with responsibility in key areas</p> <p>Academics, experts, analysts, international organisations, donors, diplomats</p> <p>Roma CSOs and activists</p> <p>Regional and local authorities in key regions</p>	<p>How realistic and detailed are the plans in the NRSF?</p>	<p>What do you see as the main risks concerning whether these plans will be implemented?</p> <p>Are these plans realistic?</p>	3.3
<p>NRCP</p> <p>Public authorities with responsibility in key areas</p> <p>Academics, experts, analysts, international organisations, donors, diplomats</p> <p>Roma CSOs and activists</p> <p>Regional and local authorities in key regions</p>	<p>How are the arrangements concerning financing measures in the NRSF?</p>	<p>Which measures may have a problem with funding in your view?</p> <p>Does the NRSF make good use of EU funds?</p> <p>How does the NRSF use private capital?</p>	3.4
<p>Public authorities with responsibility in key areas</p> <p>Academics, experts, analysts, international organisations, donors, diplomats</p> <p>Roma CSOs and activists</p> <p>Regional and local authorities in key regions</p>	<p>Is funding allocated efficiently in your view?</p>	<p>Do you think the best available and proven activities have been included?</p> <p>Do you see ways to get more done for Roma with the same funds?</p> <p>Are there any international examples that should be followed to get more accomplished?</p> <p>Do you see any risk of cronyism or misallocation?</p>	3.4
<p>NRCP</p> <p>Public authorities with responsibility in key areas</p> <p>Academics, experts, analysts, international organisations, donors, diplomats</p> <p>Roma CSOs and activists</p>	<p>Are you familiar with the details of the monitoring and evaluation arrangements for the NRSF?</p>	<p>What are the specific plans and arrangements you are aware of?</p> <p>How are they funded?</p> <p>What is your view of the indicators that are used?</p>	3.5

Regional and local authorities in key regions			
Alignment with the EU Roma Strategic Framework			
Roma CSOs and activists Academics, experts, analysts, international organisations, donors, diplomats	Does the NRSF cover all the different groups of Roma you are aware of?	Are there any other measures you would include with respect to any of the following groups: Children, Women, Roma youth, Older Roma, Roma with disabilities, EU-mobile citizens, Non-EU nationals, Stateless Roma	4.1
Roma CSOs and activists Academics, experts, analysts, international organisations, donors, diplomats	Are the measures in the NRSF part of mainstream measures where appropriate?	Which mainstream policies should be changed, in your view, to meet the objectives of the NRSF?	4.2
All respondents	Is there anything we have not asked about that you feel is worth adding regarding the NRSF?	Are there any other interviews you think we should do to get a better understanding of this topic? Are there any documents you recommend reviewing? If we come across additional questions, may we follow up with you by email or telephone?	

