



Civil society monitoring report on the quality
of the national strategic framework
for Roma equality, inclusion, and participation
in Denmark

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LIST OF ABBREVIATIONS

CoE	Council of Europe
DIHR	Danish Institute for Human Rights
ECRI	European Commission against Racism and Intolerance
NRIS	National Roma Integration Strategy
NRSF	National Roma Strategic Framework
RCM-Y1	Roma Civil Monitor 2017-2020, Year 1 report on Denmark
RCM-Y2	Roma Civil Monitor 2017-2020, Year 2 report on Denmark
RCM-Y3	Roma Civil Monitor 2017-2020, Year 3 report on Denmark

EXECUTIVE SUMMARY

In comparison with the previous NRSI (2011), the new NRSF (2021) is better elaborated and concretely mentions different mainstream approaches towards social inclusion, non-discrimination, integration, and participation. It is positive that the NRSF includes the Roma in the mainstream policies and strategies. However, the NRSF does not include Roma-targeted measures and does not address antigypsyism as a specific form of racism and discrimination against Roma. The NRSF does not address concerns about discriminatory practices and rhetoric against mobile EU citizens of Roma origin who live in homelessness in Denmark. Consequently, the Danish authorities have no specific responsibility for ensuring that Roma communities and Roma civil society are in fact supported by mainstream measures not only in theory (de jure) but also in practice (de facto).

The key recommendation of this monitoring report is that the ministries should involve Roma representatives in consultations about the NRSF as a first step in a process aimed at the capacity building of the Roma civil society in Denmark.

Participation

The Danish authorities did not involve Roma communities or Roma representatives in the drafting of the NRSF and they are not involved in the implementation and monitoring of the NRSF. Involving Roma communities in the NRSF process would have represented an opportune first step in a process of capacity building for Roma civil society in Denmark.

Relevance

The NRSF refers to a range of mainstream policies and strategies for enhancing equality, inclusion, and participation in Danish society, including frameworks against discrimination and policies/strategies concerning access to education, employment, health care, housing and essential services, social services, child protection, and the promotion of cultural awareness. The NRSF states that Danish authorities do not register ethnic data, and for that reason the NRSF does not have interventions targeted specifically at Roma. Rather, Roma are included in mainstream approaches which concern all citizens and persons with legal residence in Denmark.

Expected effectiveness

The NRSF is aligned with domestic strategies concerning non-discrimination, social inclusion, participation and integration, since the NRSF directly refers to mainstream policies and strategies within these areas. However, given that fact that there is no targeted support for Roma communities, including no concrete support for empowering civil society and no measures that specifically combat antigypsyism, there is limited incentive to ensure that mainstream approaches support Roma communities in Denmark.

Alignment with the EU Strategic Framework

The NRSF states that it responds to the Council Recommendations of 12 March 2021 on Roma equality, inclusion and participation. It follows the recommendation to develop a national strategic framework that includes the Roma in mainstream policies for social inclusion. The NRSF states that it responds to the Council recommendation that all Member States should evaluate the relevance of the Recommendations in their particular national context and adjust them so that measures are realistic and relevant at local levels. The NRSF also states that it adheres to the minimum obligations set out in the Council Recommendation.

INTRODUCTION

National Roma Strategic Framework

This report concerns the 'Danish strategy on Roma equality, inclusion, and participation' that was adopted on 25 October 2021 (hereafter NRSF). The new Roma strategy replaces Denmark's 'National Roma Integration Strategy' (NRIS) from 2011. This report compares the differences and similarities between the former and new strategy. The new NRSF was developed in accordance with the Council of the European Union's 'Recommendation on Roma Equality, Inclusion and Participation', adopted on 12 March 2021.

The NRSF follows the structure of the EC recommendation and is divided into three main sections concerning 1) horizontal objectives for equality, inclusion and participation, 2) sectoral objectives (education, employment, healthcare, social services, and housing), and 3) partnerships and institutional capacity. The content of these sections is the focus of this monitoring report and will be explained in the forthcoming sections.

The NRSF does not provide interventions targeted specifically towards Roma as could be expected in a national strategy for Roma equality, inclusion and participation. Rather, it provides a set of mainstream measures that are stated to be available to all Danish citizens and persons who have legal residence status in Denmark, including Roma. In this regard, the new NRSF resembles the former strategy from 2011, which was also set of mainstream policy measures that did not include Roma-targeted initiatives.

The main argument in the NRSF for not developing Roma-targeted initiatives is that Denmark does not register ethnic data and therefore there is no data available about the Roma in Denmark. The NRSF states that the absence of data hinders the development of initiatives only for Roma minorities, since it is impossible to estimate their experiences of discrimination and access to services and rights, including education, employment, health care, and housing.

The fundamental question that arises from this argument is whether a strategy could have been adopted in consultation with Roma civil society which supports self-identification as Roma and provides targeted possibilities for the social organisation of civil society groups and special measures for inclusion. Although ethnic data is not registered in Denmark, there is no hindrance to developing concrete action plans for investigating the situation of Roma in Denmark and creating specific initiatives and support (incl. budgets) in the horizontal and sectoral areas listed in the NRSF. Especially, discrimination against destitute mobile EU citizens of Roma origin and laws used to target rough sleeping deserve further attention in the NRSF. Furthermore, it seems necessary to more explicitly include measures that combat antigypsyism rhetoric. This perspective will be unfolded throughout this report in line with the relevant themes.

About this report

The focus of the RCM report is to analyse the content of the new NRSF. The study is carried out through a desk study of relevant documents and consultations with representatives of relevant ministries, institutions, and civil society. The main methodological limitation has been the difficulty of organising consultations with representatives from ministries because they have been focused on the ongoing war in Ukraine. The feedback that was received from the ministries was therefore limited and very brief.

The sections concerning mobile EU citizens of Roma origin are based on qualitative data collected by the author of this report in connection with doctoral and post-doctoral research with a group of homeless Romanian Roma women and men in Denmark.¹ It is

¹ See Ravnbøl 2015, 2017, 2018.

also based on consultations with civil society organisations who work with homeless and vulnerable migrants. It is important to underline that this data is not representative of all EU citizens of Roma origin who live and work in Denmark. Rather, it is representative of some of the concerns that relate to destitute EU migration and the challenges that EU citizens who live in poverty experience when they migrate abroad, in this specific case, to Denmark.

This monitoring report is written by the author as an independent researcher in consultation with institutions and experts who work in relevant fields. However, due to extraordinary business related to the war in Ukraine, the author did not receive many comments or much feedback on this report from the authorities and ministries that were contacted. Many comments are still pending as per 29 June 2022. For this reason, their feedback was not integrated into this final report.

1. PARTICIPATION

The Roma population in Denmark can be classified into two categories; domestic Roma, and other EU citizens of Roma origin.² There are no official statistics on the domestic Roma population in Denmark since ethnic data is not registered by Danish authorities and institutions.³ Estimations of the population size range between 1,500-10,000 domestic Roma in Denmark.⁴ The domestic Roma population is mostly comprised of migrant workers from the former Yugoslav republics who arrived in Denmark in the 1970s and their families, as well as former refugees from the Balkan war, who arrived in the 1990s and their families.⁵ With regard to EU citizens of Roma origin, there are no official statistics on the numbers residing in Denmark. The majority of EU citizens of Roma origin who travel to Denmark appear to come from Romania, although there are also some from Bulgaria and Hungary.⁶

Roma who have national citizenship or permanent residency in Denmark are entitled to rights and state services on an equal footing with the majority population in Denmark. This includes access to public education, public health care, social housing, labour market assistance, social benefits, etc. This being said, there is a need to move beyond a merely formal focus on equality towards investigating substantially how Roma in Denmark in practice experience their livelihoods in Denmark. This includes whether and how Roma feel included in relation to the sectoral areas listed in the NRSF. More research with and by Roma in Denmark about their situation would provide much-needed insight into their everyday experiences of the possibilities and limitations they have with inclusion, equality, and participation in Danish society.

There are currently no active Roma NGOs in Denmark and national organisations, and institutions that work with human rights and the social inclusion of minorities do not currently have Roma-targeted activities. For this reason, the compilation of this report involved consultation with independent resource persons of Roma origin who live in Denmark but who are no longer actively involved in civil society activities.

1.1. Roma participation in the NRSF preparation

Roma representatives have not been consulted in the preparation of the NRSF. Although there are currently no active Roma civil society organisations, there are Roma representatives who could have been invited by the public administration to participate in the process of preparing the NRSF. Based on the interviews and consultations with the ministries who have been involved in the NRSF preparation, Roma representatives were not part of the process.

Based on consultations with Danish institutions and organisations who work with human rights and social inclusion, it also appears that they were not invited to participate in the NRSF preparation.

² The context is also elaborated in the RCM 2017-2020 reports on Denmark, available at: <https://cps.ceu.edu/roma-civil-monitor-reports>

³ Danish legislation concerning personal data collection available at: <https://www.retsinformation.dk/forms/r0710.aspx?id=828> (accessed April 2022).

⁴ DIHR report 2012:4; Committee on Legal Affairs 2002: Appendix 1; Danish website about Roma developed by Biljana Muncan and Johannes Laursen: http://romnet.dk/spg.html#_antal (accessed April 2022).

⁵ DIHR report 2012:5; Jørgen Anker et al. 2011:4; and Muncan and Laursen at: http://romnet.dk/spg.html#_antal.

⁶ Ravnbøl 2019

1.2. Roma participation in the NRSF implementation, monitoring, and evaluation

Roma representatives have not been invited to participate in the NRSF implementation, monitoring and evaluation. As stated above, there are Roma representatives who could have been invited to participate in such activities, but it seems that they have not been consulted.

1.3. System of policy consultation with civil society and stakeholders

Roma representatives have not been consulted about the draft NRSF document. The same is the case with Danish institutions and organisation who work with human rights and social inclusion, where it also appears that they were not invited to comment on the draft NRSF.

1.4. Empowerment of Roma communities at the local level

Given the current situation in Denmark, where there are no active local Roma organisations, there is a strong need for specific measures for empowerment of Roma communities at local levels. However, neither the previous NRIS nor the new NSRF include targeted approaches for empowering Roma communities. Participating in the preparation of the new NRSF and involvement in activities for the implementation and monitoring of activities could have represented an opportune process for empowering Roma communities at the local level.

1.5. Capacity-building of Roma civil society

Neither the previous NRIS nor the new NSRF include targeted approaches for the capacity building of Roma civil society. Support for civil society is a mainstream measure available to all citizens in Denmark. As outlined in the previous section on empowerment, participating in the preparation of the new NRSF and involvement in activities for the implementation and monitoring of activities could, in itself, have served as activities that support the capacity building of Roma civil society. Although there are currently no active Roma organisations, there is potential for establishing such organisations by inviting Roma representatives to take part in processes such as the NRSF development.

2. RELEVANCE

2.1. Fighting antigypsyism and discrimination

Denmark has a historical record of anti-Roma legislation, which was finally abolished in 1953.⁷ Institutional practices that discriminated against the Roma population nevertheless continued up until the mid-1960s and even beyond in some municipalities. For example, the municipality of Elsinore received criticism in 2005 for ethnic discrimination against Roma residents and in particular against Roma children who were placed in segregated school classes (see the section on education).

Discrimination and prejudice against the Roma are the main explanations given by Roma representatives interviewed in connection with the RCM reports concerning why they do not participate in public debates and civil society organisations. More specifically, they want to avoid being confronted with discriminatory stereotypes and ethnic biases about the Roma. In this context, the Danish media plays a strong role in perpetuating discriminatory images of Roma – for example, in TV programs about families of thieves and criminals entitled “gypsy boss”.⁸

Danish politicians have been outspokenly negative about EU mobile Roma, who live in homelessness in Denmark. Since 2010, several politicians have criticised EU regulations for limiting the Danish authorities’ possibilities for expelling EU citizens on the grounds of begging and rough sleeping in public spaces.⁹ The political discourse has developed from a discourse concerning destitute EU migration in general to a discourse particularly focused on EU citizens of Roma origin who are represented as a societal problem. Examples of such representations include when politicians refer to camps of homeless migrants as being “Roma camps” and persons who engage in begging as being “Roma beggars” without any grounds for knowing the persons’ actual or self-declared ethnicity.¹⁰ (For more information about the implementation of legislative amendments that particularly target EU mobile Roma, see Section 2.6).

In political opinion pieces and other newspaper articles, politicians have on several occasions referred negatively to EU mobile Roma who live in homelessness in Denmark, calling them a “Roma plague” and a “Roma occupation” that must be stopped.¹¹ Explicit negative references to Roma have been made on several occasions in public hearings in the Parliament, one example being a minister who said, when answering a question on measures for restricting the immigration of Roma from other EU countries to Denmark, that: “It is well known that the Roma as a group are notoriously difficult to integrate into society, often living as subsistence-less and otherwise have difficulty making a living by legal means in Denmark”.¹²

⁷ See also RCM 2018 report [Civil society monitoring report on implementation of the national Roma integration strategy in Denmark: Focusing on structural and horizontal preconditions for successful implementation of the strategy](#), Enevig 1975: 51-68; Høiris 1983: 26-32; Koch 1998: 99-117; and: <http://www.romnet.dk/romafolketdk.html>

⁸ Example: [Sigøjnerbossen - og hans berygtede familie - TV 2 PLAY](#)

⁹ E.g. statements of the Mayor of Copenhagen at: <http://www.fyens.dk/indland/Frank-Jensen-kræver-loesning-paa-romaer/artikel/1833097> (accessed April 2022).

¹⁰ See e.g. article by the current Head of Parliament at: https://puls.b.dk/roma-lejrene-i-koebenhavn-skal-fjernes/?_ga=2.226146714.1079470250.1516712594-535555613.1515085188 (accessed April 2022)

¹¹ Newspaper article by a Member of Parliament: <https://www.b.dk/kommentarer/roma-besaettelsen-skal-stoppes-de-udnytter-os-de-chikanerer-os-og-de> (accessed April 2022)

¹² The author’s translation of the original. Question no. 231, 18 November 2016 responded to by the Minister of Foreign Affairs, Integration and Housing Inger Støjberg, available at: <http://www.ft.dk/samling/20161/spoerqsmal/S231/index.htm> (accessed April 2022).

Fieldwork among EU mobile Roma in Denmark that was carried out by the author of this report during the coronavirus pandemic (2020-2022) created insight into the current livelihood situation of many homeless Roma in Denmark. During the Covid-19 pandemic lockdown, many EU mobile Roma left their countries of origin while others were banned from entering because they could not give evidence of a work contract, and the borders for closed due to the global health crisis. This meant that for a period of time there were fewer homeless Roma in the streets and the political debate about them therefore also decreased. However, given the growing poverty in the aftermath of the pandemic, due to which many impoverished Roma families have lost their income and have become increasingly entrapped in debt, it is to be expected that the numbers of homeless EU mobile Roma will increase again during the coming summer periods. Many of them come to collect refundable beverage containers at the Danish summer festivals. Hence, there is a strong concern that antigypsyist rhetoric will likewise increase, just as we witnessed from 2010 and onwards.

The European Commission against Racism and Intolerance (ECRI) has in several reports encouraged recognition of Roma as a national minority and called for Roma-targeted initiatives and budgets, as well as general data collection on the situation of Roma in Denmark.¹³ In 2017, the ECRI reconfirmed a previous criticism from 2012 and 2014 of the Danish Government for not measuring the impact of the equal treatment approach on the situation of Roma people.¹⁴

The new NRSF does not address racial and ethnic discrimination against Roma and does not specifically target antigypsyism. The NRSF instead discusses the mainstream mechanisms for combating discrimination and complaint mechanisms available to persons who experience discrimination.

The NRSF states that since ethnic data is not registered in Denmark, no particular measures exist to combat discrimination against particular ethnic groups, including regarding antigypsyism. Rather, all ethnic groups are covered by the same generic non-discrimination provisions. This means that the institutional settings for combating discrimination and hate speech make no specific reference to Roma or other ethnic minorities in Denmark. The NRSF highlights Danish legislation that prohibits discrimination and establishes equal treatment for ethnic minorities. It also highlights that complaints can be addressed to the Board of Equal Treatment, which deals with cases concerning discrimination,¹⁵ and mentions that the Danish Institute of Human Rights (DIHR) works for the promotion of equal treatment.

2.2. Education

The previous RCM reports Y1 and Y2 highlighted past experiences of school segregation of Roma children in Denmark.¹⁶ In the period 1982-2004, the municipality of Elsinore, where a significant proportion of the domestic Roma population is estimated to live, established Roma-specific school classes as well as a Roma-specific social service office.¹⁷ The

¹³ ECRI report 2017:27

¹⁴ European Commission against Racism and Intolerance (ECRI, 2017) *Report on Denmark (fifth monitoring cycle)*, p. 27. Available at: <https://www.coe.int/t/dqhl/monitoring/ecri/country-by-country/denmark/DNK-CbC-V-2017-020-ENG.pdf>

¹⁵ <https://ast.dk/om-ankestyrelsen/hovedopgaver>

¹⁶ Ravnbøl 2018 (a) and 2019

¹⁷ The first segregated Roma class was established in 1972 in Elsinore as a reception class for newly arrived Roma children. In 1982, the first so-called "special class for Roma" was established and later followed three more classes. In 2001, it was argued by authorities that the classes were meant for Roma children who "cannot be accommodated in normal classes or special classes" (Helsingør Municipality, 2001, 80; see also

municipality argued that these exclusive programmes for Roma were designed with the intention of supporting the population, but in practice the initiatives showed they had the opposite effect of further enhancing social exclusion.¹⁸ The segregation of the Roma in Elsinore received significant criticism for discriminating on the grounds of ethnic origin, including by the then-National Complaints Committee on Ethnic Equal Treatment,¹⁹ as well as by the Danish Ministry of Education²⁰ and the Council of Europe.²¹ The Roma school classes were deemed unlawful and were finally abolished in 2004. According to communication with a member of the city council in Elsinore, all segregation practices have been stopped in Elsinore. There are no particular initiatives against antigypsyism in the Danish educational system. There are no recent studies that document the experiences of Roma children and youth in Danish schools²² and there is a great need to study the experiences of Roma children and youth in Denmark.

Access to public education in Denmark for EU citizens depends on registration as either an EU worker, student, or self-employed person, and in such cases a Danish social security number (CPR number) will be granted. Upon this CPR registration, there is a right to family reunification and children can be enrolled in public education and receive mother-tongue instruction if one of the parents is an EU co-citizen. Consequently, for EU citizens with precarious and informal employment, the lack of access to CPR registration effectively constitutes a barrier to the right to education for their children.

The NRSF's approach to education is similar to the rest of the intervention areas in the NRSF – namely, including Roma in mainstream approaches. Hence, it does not include any targeted educational interventions for Roma children and youth. The NRSF specifically refers to Danish legislation that establishes equal access to day care and education, which includes financial support for low-income families. It also states that since 2017 new pedagogical initiatives have been put in place that focus on children in vulnerable families that give particular attention to culture and language.

The NRSF refers to Danish legislation which establishes ten years of compulsory education, and specifies that public education (primary, secondary, and high school) is free of charge in Denmark. Children with special needs are granted specific support and there is linguistic support for children who have other mother-tongue languages than Danish.

The NRSF does not however specify that at municipal levels the availability of mother-tongue instruction differs significantly, and that not all municipalities offer such services free of charge. For example, mother-tongue instruction is only a legal requirement for children who come from the EU, the European Economic Area (EEA)- the Faeroe Islands, and Greenland. This means that language instruction in Serbo-Croatian, Macedonian, Albanian, or Romanés, for example, which are some of the languages that the Roma

Laursen 2004). It was the teacher together with the municipality's language consultant who assigned children to the Roma classes. A study from 1995 argued that there were cases when Roma children had been assigned straight to Roma classes without having been placed in a regular class first (see Jensen 1995, 83). The classes accommodated Roma children from the 1st to the 10th grade, and each class had 25 teaching hours and a social pedagogic instructor (see Jensen, 1995 and Romnet.dk: romnet.dk - om romaer / sigøjnere i Europa og Danmark).

¹⁸ Jensen 1995; and: <http://romnet.dk/romaklasser.html>

¹⁹ <https://ast.dk/naevn/ligebehandlingsnaevnet/afgoerelser-fra-ligebehandlingsnaevnet/#?FreeTextSearch=roma&AdmMyndighedNavn=Klagekomit%C3%A9en%20for%20Etnisk%20Ligebehandling>

²⁰ <https://politiken.dk/indland/art4898007/Ministerium-Romaklasser-er-ulovlige>

²¹ Council of Europe, ResCM, 2005:9.

²² See Jensen 1995 for one example of a study (MA thesis) concerning Roma children in segregated classes.

population use, is not a legal requirement, since these languages are not EU languages. There is currently no possibility for instruction in Romanés in Denmark.

2.3. Employment

The NSRF does not include measures that target antigypsyism in the Danish labour market, nor does it include Roma-targeted interventions concerning employment. It does not mention the integration of vulnerable EU citizens into the Danish labour market.

The NSRF states that Roma minorities are entitled to benefit from labour market inclusion measures on an equal footing with all other citizens and EU workers who fulfil the Danish requirements for legal residence. It states that all employees in the Danish labour market are covered by legislation on equal treatment and against discrimination. All employees are therefore protected against discrimination on the grounds including gender, ethnicity, race, nationality, social class, age, sexuality, religion, political belief, and disability. The NRSF states that the Danish labour market includes employment-seeking support that matches individual needs, hence there is no need for measures for particular ethnic groups. The NRSF adds that particular initiatives have been set in place for including vulnerable groups into the labour market and that Roma persons, if they are amongst these vulnerable groups, are entitled to participate in such initiatives. These initiatives include 1) projects for supporting long-term unemployed persons to enter the labour market through individual support and personal guidance, and 2) trans-sectorial initiatives where actors from the fields of social services, health care, and employment cooperate to support persons who have particular challenges to integrate into the labour market, and 3) increased focus at a municipal level to support young persons (> 25 years) who do not have an educational degree to enter into the labour market or to complete an education or vocational training.

There are no specific initiatives concerning antigypsyism and the inclusion of Roma persons in Danish workplaces. Furthermore, and due to the lack of ethnic data, it is impossible to evaluate whether and how discrimination is a concern amongst employees of Roma origin in the Danish labour market. The few interviews that have been conducted with Roma women and men in connection with the three RCM reports highlight a concern amongst some persons of Roma background that their colleagues and employers could have ethnic biases towards them if they disclose their Roma ethnicity. They only reveal their national background at work (individuals from countries in the Balkan region, for example). Hence, there is a need for more comprehensive study of the experiences of the Roma population within the area of employment.

In regard to EU mobile Roma, some face significant limitations entering into the Danish labour market primarily due to language-related barriers if they do not speak English or Danish. This is especially the case for destitute migrants who often do not have the formal CVs that are needed for applying for jobs in the labour market in Denmark. Many who have been interviewed in connection with the RCM reports report to being exploited by employers and agents who contract them for informal jobs and take advantage of their vulnerable situation by giving them low salaries, bad working conditions, or no payment at all.²³

2.4. Healthcare

The NRSF states that the Roma have equal access to health care if they are Danish citizens or have legal residence in Denmark. It also states that EU citizens who have public health insurance in their countries of origin also have the right to public health care. It specifically states that persons who do not hold legal residence in Denmark and who do not have

²³ Ravnbøl 2018

public health insurance in another EU Member State are only entitled to emergency health care treatment in Denmark. Emergency health care includes treatment for accidents, sudden illness and labour, or the worsening of chronic illness. Excluded is treatment after the acute phase, including follow up and contact with a general practitioner or other relevant health care professional. The NRSF describes recent amendments to the Danish Health Care Act which state that the cost of public health care will be levied on patients, who can be reimbursed when they return home. In situations when the patient cannot cover the cost of treatment, exceptions can be allowed for free public health care including for homeless and unregistered migrants or other persons who are obviously not in a position to cover the cost of treatment. No charges will arise for persons under the age of 18 or pregnant women in acute labour.

The NRSF does not include measures for addressing antigypsyism in the Danish health care system. The NRSF does not address the consequences that the limited provision of health care to unregistered migrants and therefore potentially also to destitute mobile EU citizens of Roman origin.

There are no studies concerning the health situation among the domestic Roma population. Hence, it remains to be thoroughly researched whether the Roma population are subject to particular health concerns and experience inequality and discrimination in access to health care. This research is also needed due to health studies concerning Roma populations from other Scandinavian countries that shed light on ethnic biases and discrimination in the health care system.²⁴

A study from 2020 sheds light on the health situation among homeless and unregistered migrants in Denmark, of whom some are Roma.²⁵ It highlights how the Danish Health Care Act only allows for emergency health care in situations of acute illness. This means that non-acute physical and mental illness, follow up treatment, visits to general practitioners, and drug- and alcohol-related treatment are not available to unregistered migrants. The findings showed how homeless and unregistered migrants in Denmark consequently experience substantial social and health-related concerns. Mental illness deteriorates into acute and long-term mental illness. Alcohol addictions are left untreated, and patients are constantly admitted into emergency wards for detoxing. Non-acute physical illness develops into acute and chronic conditions when left untreated. The coronavirus crisis further illustrated that insufficient access to healthcare and places to isolate results in severe risks for unregistered migrants since many have chronic illnesses, including diseases of the respiratory system. On this basis, the Council for Socially Marginalised People has recommended that the government changes the Danish Health Act to allow for necessary health care, including the possibility for diagnosing and treating individuals when there is a risk of deterioration in their condition.

2.5. Housing, essential services, and environmental justice

No data are available on Roma and social housing, and there are no particular measures or strategies in Denmark concerning Roma persons' access to housing or for addressing antigypsyism in housing allocation. There are, however, challenges concerning housing for Roma and particularly for mobile EU citizens of Roma origin.

²⁴ See for example a report prepared for the Swedish health authorities including interviews with Swedish Roma who experience that health staff have ethnic biases towards the Roma: [4363 \(minoritet.se\)](#)

²⁵ The authors of the RCM reports Y1, Y2, and Y3 conducted a study in 2020 concerning the health situation among homeless and unregistered migrants in Denmark for the Council for Socially marginalised People (in Danish: Rådet for Socialt Udsatte). This study was based on fieldwork and interviews with healthcare professionals and employees/volunteers in social organisations and particularly with migrants who live on the streets of the two largest cities in Denmark (Copenhagen and Aarhus). These migrants are unregistered and therefore do not have a Danish social security number which provides access to the public health care system. Many of the Romanian, Hungarian, and Bulgarian interview respondents were of Romani ethnicity. See Ravnbøl 2017; Ravnbøl & Barbu 2020.

The section on housing and essential services in the Danish NRSF is quite extensive and covers a range of different mainstream policies and strategies, which are listed in the following sections. This part of the report therefore combines the analysis of the NRSF approach with a review of the current challenges that Roma communities face in regard to each thematic area.

The NRSF states that the Danish State is obliged to ensure access to all citizens and persons with legal residence status to adequate housing by way of allocating social housing to disadvantaged persons and families. The municipalities in Denmark can dispose of 25% of all vacant family dwellings and dwellings to young persons to solve social housing problems.²⁶ The NRSF highlights that 20% of all housing in Denmark takes the form of social housing for families, youth, the elderly, and persons with special needs (627,000 in total). The primary target group is persons within these categories who have economic difficulties. The NRSF highlights a governmental strategy to address what is defined as “parallel societies” in Denmark,²⁷ which was also discussed in depth in the RCM-Y2 report. The main aim with the strategy is to: “address the problems with residential areas that have major challenges related to a disproportionate share of residents who are unemployed, have a low income or education, or who have criminal records”.²⁸ The strategy distinguishes between what is defined to be “deprived neighbourhoods” and what is defined to be “ghetto areas” – with the definition that “ghetto areas” are areas that have issues with aforementioned criteria and also have a higher share of non-Western immigrants than deprived neighbourhoods. The NRSF states that the strategy does not have measures that target specific ethnic, religious, or national groups but includes mainstream measures for residents in areas defined as “ghetto areas”. It is argued that the aim is to raise up these areas into a more advantageous position by increasing social and economic inclusion.

However, the strategy against “parallel societies” has been met with concern by several scholars, organisations, and institutions, including the DIHR.²⁹ As also discussed in the RCM Y2 report, the main concerns are that the strategy uses as a criterion that a residential area can be defined as a “ghetto area” when more than 50% of the residents are of non-Western origin. In other words, ethnicity is the key identifier that combined with socioeconomic factors result in the labelling of an area as a “ghetto”.

Furthermore, the tearing down of housing in these “ghetto areas” is a concern since there is a lack of permanent and affordable housing options in many Danish municipalities. This directly affects the rights of tenure for the residents, since it is uncertain where and how families can resettle if the housing that they live in is in an area designated for dismantling. The strategy also allows for certain restrictions of the social benefits of the families who live in “ghetto areas” if they do not fulfil the regulations in the new measures. One example is the fourth initiative in the strategy, which concerns a good start in life for all children and young people. One of the requirements under this initiative is compulsory preschool attendance of 25 hours per week of children who are above one year of age. This means that preschool attendance, which is voluntary in other parts of the country, is made compulsory for children above the age of one in areas defined as “ghetto areas”. Families in the residential areas that are defined to be “ghetto areas” who do not comply with this new preschool prescription will have their child-care support reduced. Many civil society

²⁶ CERD report (CERD/22-24) 2019:19

²⁷ The strategy is published by Regeringen (2018) available at: <https://www.regeringen.dk/nyheder/ghettoudspil/>

²⁸ CERD report CERD/22-24) 2019:6.

²⁹ See: <https://videnskab.dk/kultur-samfund/parallelsamfund-er-noget-politikerne-har-opfundet> ; See response by DIHR to Denmark’s periodic report to CERD (2018): <https://menneskeret.dk/hoeringssvar/danmarks-22-24-periodiske-rapport-fns-racediskriminationskomite/>

organisations have criticised the strategy for enhancing the pressure on ethnic minorities by enforcing compulsory pre-school, since the latter are already in a vulnerable situation. Ethnic minorities are specifically affected by the context in which Danish authorities have reduced the level of social welfare benefits for certain categories of new arrivals in Denmark. This has been described by ECRI in a report from 2017 and is discussed in depth in the RCM 2019 report '[Civil society monitoring report on implementation of the national Roma integration strategy in Denmark: Assessing the progress in four key policy areas of the strategy](#)'.

The strategy against parallel societies can potentially affect Roma families who live in residential areas on the list of "ghetto areas". This includes if they live in housing estates designated for dismantling, since many municipalities have no adequate and affordable housing options for relocated families. It could also affect Roma families with children in the preschool age (above one year old) who are affected by measures for compulsory preschool. The NRSF does not address these issues.

Moving to a second thematic area related to housing, the NRSF particularly highlights legislation concerning social support for housing for disadvantaged families and persons who become homeless and who do not themselves have the possibility to solve their housing problem. It highlights that the state is obliged to support these families and persons to find a place to live, and through financial payments. The NRSF also highlights that the government has enacted different initiatives to prevent forced evictions of persons who are unable to pay their rent in due time and concludes that these prevention initiatives have substantively reduced the number of evictions.

In connection to this, the NRSF also mentions that the government is working to eradicate homelessness in Denmark and mentions the national strategy against homelessness. It however does not put forward any concrete examples. Rather, it moves on to specify that camping is only permitted in camping grounds and that it is illegal to live year-round on a camping ground, but the latter are to be used only for limited stays.

Interviews with representatives of a Danish civil society organisation called the DanChurch Social (in Danish: *Kirkens Korshær*) have shed light on the concern with private camping grounds who deny entry to Roma families from EU countries. DanChurch Social has a social shelter and café called the Compass (in Danish: *Kompasset*), which also provides support specifically to destitute and homeless migrants. Staff at the Compass have collected several cases concerning private camping grounds in Denmark that deny entry to Romanians, and specifically to Romanian Roma. The cases that DanChurch Social have found show that even though the camping grounds are open and have free spots available, Romanian Roma guests are told to leave the premises when they arrive. The staff at the Compass have been told about several cases. In the summer of 2021, the Compass brought a case to the Board on Equal Treatment. The case showed how a group of eight Romanian Roma had contacted the Compass for help finding a free spot on a camping ground where they could stay for a few nights. The Compass called a camping ground to ask about availability, but received the reply that "Romanians are often trouble", and that they wanted to meet the group first. When the group arrived on the site, they were told that the camping ground was full and that there were no available spaces left. As a test, the Compass then called to reserve spots for a fictive group of Italians and were informed that the Italians were welcome since there were spots available. This happened during several test calls. When Compass confronted the camping ground about the differential way that they seemed to treat Romanian Roma, the staff at the camping site denied all knowledge of such practices. The Board on Equal Treatment judged this complaint in favour of the applicants and underlined that the rejection of entry to the group of Romanian Roma was a case of direct discrimination on the grounds of ethnic origin. Compensation was set at 5,000 DKK / 672 EUR (April 2022).

In the section on housing, the NRSF also directs attention to legislation concerning rough sleeping. The NRSF includes a substantial section on Danish legislation that prohibits so-called "discomforting camping in public spaces" (in Danish: *utryghedsskabende lejre*). The

NRSF argues that this legislation concerns everyone in Denmark, regardless of nationality and ethnicity. This argument can however be challenged by recent statistics and research. The legislation came about in 2017, when the Danish government amended the Code on Public Order to address cases of persons sleeping rough (camping) in public spaces. Penalties include a fine, prohibitions on entering the city zone, and even expulsions upon repetition. The amendment to the law was the result of a year-long political effort to push out homeless migrants who had built camps in the city centre in Copenhagen. It was argued that the camps created discomfort for residents in the cities, and several Danish politicians, including the current prime minister of Denmark, announced that the law is meant to target Roma camps, not Danish homeless persons who sleep rough. The change of law has massively increased the number of charges, arrests, and convictions of homeless migrants, especially homeless Roma persons who take shelter in public places. The most recent statistics show that foreigners constitute 97% of those who are charged with this legislation despite the fact that foreigners only constitute 8% of the total homeless population in Denmark. Romanians constitute the majority of those who are charged with camping in public space. Civil society organisations, the Danish Institute for Human Rights, as well as the Council of Europe have on several occasions criticised the law for disproportionately affecting foreigners. The Council of Europe has also argued that the law seems to be implemented to target EU mobile Roma in particular. Several cases have been heard at the Danish Courts at which social organisations and lawyers have assisted homeless persons to appeal their case or to complain and file for compensation. Many cases have also been won, as the courts have deemed the convictions unlawful (both according to Danish law and EU law) and have provided compensation to the injured parties. For more information see also RCM-Y1 and RCM-Y2.

The NRSF does not address this context of the disproportionate use of the law to target EU mobile citizens, nor does it address the critique that has been made of this legislation by national and international human rights organisations. The NRSF does not include any measures for addressing antigypsyism in the contexts of housing and government measures to end homelessness.

2.6. Social protection

The NRSF addresses social protection under the section on essential service provisions and social services (see 2.5 and 2.7).

2.7. Social services

There is no ethnic data nor are there any studies which show whether and how Roma in Denmark receive social services. The NRSF states that all citizens and persons with legal residence status in Denmark have a legal right to receive social services (according to the Danish Social Act). This includes services to disadvantaged and vulnerable children and adults; services for the elderly; and services for persons with disabilities. Social services consist of economic support; housing; home care and personal case-handling; and assistance depending on the needs of the person.

The NRSF highlights four areas where specific efforts are made to provide social services including elderly care; services to persons with disabilities; services to homeless persons; and measures for addressing domestic violence.

With regard to the elderly, the NRSF highlights that, as citizens and legal residents, all persons above the age of 75 are entitled to home visits a minimum of once a year. They can also apply for help with domestic chores and personal assistance. They can apply for elderly-friendly housing.

In regard to persons with disabilities, the NRSF highlights that they can apply for personal assistance and practical support (e.g., equipment, transport, etc.) as well as for economic support.

The NRSF states that homeless persons have a legal right to stay in shelters and take part in housing programmes (e.g., Housing First), according to the Danish Social Act. However, the NRSF does not address the current problem that homeless migrants in Denmark face difficulty accessing shelters. This is because shelters and social cafes have been informed by local municipalities that they are responsible for checking the legal status of their clients to prevent persons with irregular status entering. The uncertainty that many staff members have about how to check legal status has resulted in many shelters denying entry to homeless migrants. This challenge is part of a broader concern concerning EU mobile citizens' access to social services, which is limited only to those who can access a Danish personal identification number (social security number), which is termed a CPR number in Danish.

A CPR number is available to all national citizens born and/or residing in Denmark as well as to EU citizens and third-country nationals who have legal residence in Denmark. In the case of other EU citizens, the CPR number is obtained through their registered status as an EU worker, or as a student at a recognised educational programme, or as a self-employed business owner, or as being self-supporting (including economically non-active persons) with the funds to self-maintain.³⁰ The Danish authorities request that an EU worker must have a registered residential address plus an employment contract with an estimated employment period of more than 10-12 weeks and more than 10-12 hours per week in order to issue a CPR number.³¹ If the conditions set out by the Danish State Administration for obtaining a CPR number are not met, a general taxation number can be issued instead. However, the taxation number does not, unlike the CPR number, grant access to public services.

The Danish interpretation of EU Directive 2004/38/EC in the Danish context reflects Article 7 (1) (b), which limits the possibilities for residency by persons who lack the financial means to be self-supporting, who are not enrolled in a course of study, or who do not have the possibility to access housing and formal employment contracts. This particularly affects EU citizens arriving in Denmark who come from conditions of poverty and who are low-skilled with no official prior employment record. The regulated labour market, the expensive housing market, and the requirements for obtaining CPR registration (and thereby social assistance) further enhance the barriers that many destitute EU citizens experience in regard to establishing themselves in Denmark.

The NRSF does not address this context, which in practice means that EU citizens can have a legal right to stay in Denmark for a short period of time but do not fulfil the requirements to access a CPR number. This leaves them out of the scope of social services including access to shelters and programmes for homeless (incl. Housing First), social housing, employment programmes, social benefits, health care beyond emergency health care treatment, education, language schools, and other services that could help them integrate into Danish society.

In regard to domestic violence, the NRSF states that anyone with legal residence can seek free counselling in Denmark and can stay temporarily in shelters/centres for victims of domestic violence. The NRSF specifically mentions that women who seek support in crisis centres are entitled to psychological support and that the government has recently opened

³⁰ See the Danish State Administration: <https://www.statsforvaltningen.dk/site.aspx?p=6116> and <https://international.kk.dk/artikel/how-do-i-get-cpr-number> The funds for self-maintenance must at a minimum correspond to the sum of the benefits to which the person is entitled pursuant to Section 25, subsection 12, and Section 34 of the Active Social Policy Act (available at: <https://www.retsinformation.dk/Forms/R0710.aspx?id=19124>).

³¹ See the Danish State Administration: <https://www.statsforvaltningen.dk/site.aspx?p=6116>. Requirements are inspired by European Court of Justice case law, which defined minimum employment conditions at 10 to 12 weeks of more than 10 to 12 working hours per week; see the judgement Kempf (C-139/85) and Megner and Scheffel (C-444/93).

96 new spots in centres for women across the country. It also refers to initiatives for treating perpetrators of domestic violence.

However, the NRSF does not mention specific measures for ethnic minority women or for Roma women specifically, just as it does not include measures for addressing antigypsyism in social service provision.

2.8. Child protection

There is no ethnic data nor are there any studies which shed light on whether and how child protection issues affect the Roma population.

Studies show that many of the Roma who travel to Denmark and live in homelessness are families (mother, father, and their oldest children who are above 18 years of age).³² Some are younger than 18 years old, but hide from Danish authorities because they know that the Danish authorities would take the children into custody since legislation prohibits that children live on the street or in homeless shelters. This, however, does not mean that there are no concerns about homeless Roma children in Denmark. The RCM-Y3 report specifically highlighted how a social service counselling centre in Copenhagen for families, children, and youth (in Danish: *Den Sociale Døgnvagt*) on several occasions has expressed concern about encountering Roma minors living in homelessness in Copenhagen (ref 55). The social workers expressed that they lacked the means and language skills to support these children and young persons since their only option is to place the children in temporary custody while they try to reach a guardian or send the child home.³³

The NRSF does not include any Roma-targeted measures for child protection and it does not include measures for addressing antigypsyism in child protection. The NRSF states that Danish municipalities are responsible for supporting vulnerable children, youth and families. This support ensures that children develop and transition to becoming independent and healthy adults on an equal footing with their peers. The municipality is obliged to be attentive towards children in need and conduct investigations in cases when there are concerns about the child or young person's wellbeing. This investigation must take particular note of the individual needs and challenges of the child and young persons.

2.9. Promoting (awareness of) Roma arts, culture, and history

There are no public initiatives for promoting awareness of Roma arts, culture and history. Occasionally there are private initiatives that promote Roma arts and history but none that are mainstreamed into public initiatives such as into curricula at schools. The NRSF reflects this approach, and does not include any mentioning or promotion of Roma arts, culture, and history. It does not include measures to address ethnic biases, stereotypes, or antigypsyist representations of Roma in Danish media and literature. The NRSF only includes a section concerning the general promotion of cultural awareness in the educational system (see section on Education, 2.2).

³² Fieldwork conducted by the authors of the three RCM reports from 2014, still ongoing.

³³ See RCM 2020 report "[Civil society monitoring report on implementation of the national Roma integration strategy in Denmark Identifying blind spots in Roma inclusion policy](#)" by Simona Barbu (2020:18).

3. EXPECTED EFFECTIVENESS

3.1. Coherence with related domestic and European policies

The Danish NRSF is aligned with domestic strategies concerning non-discrimination, social inclusion, participation and integration since the NRSF directly refers to different mainstream policies and strategies under each thematic section.

However, the NRSF only mentions mainstream approaches and does not specify any Roma-targeted initiatives or specific measures to combat antigypsyism. The NRSF's fundamental argument is that because Denmark does not collect ethnic data, then there are no possibilities for designing measures specifically for an ethnic minority group. On this basis, it is stated clearly in the introduction that all citizens and persons with legal residence, including Roma, are covered by national strategies, policies, and laws. However, given that fact that there is no targeted support for Roma communities, including no concrete support for empowering civil society and no measures that specifically combat antigypsyism, then there is limited incentive to ensure that the Roma are in practice included into the national strategies and initiatives.

The NRSF is not aligned with Roma inclusion goals at the EU level, including the European Commission's 10 common basic principles on Roma inclusion.³⁴ Specifically, it does not fully meet the EC principle 2 concerning explicit but not exclusive targeting of the Roma. This principle implies focusing on Roma people as a target group without excluding others who share similar socioeconomic conditions. This includes, for example, that authorities in the design of policies and initiatives pay particular attention to the possible negative impact of broader policies to tackle the specific problems of the Roma, in particular their social inclusion. The Danish approach is mainstream and therefore does not directly include the Roma but rather includes Roma alongside all citizens and persons with legal residence status. In this regard, the Danish approach meets the criteria of including Roma into broader policy initiatives but does not pay particular attention to the specific problems of the Roma and how broader policy initiatives in practice affect their social inclusion.

3.2. Responsibility for NRSF coordination and monitoring

The NRSF places the responsibility for coordination and monitoring of the strategy with the Roma Contact Point within the Ministry of Immigration and Integration. The Roma Contact Point is in fact only one employee within the ministry who, amongst other duties, is also the contact person who liaises with the European Commission regarding enquiries concerning the Roma. The Contact Point does not initiate any Roma-specific activities and is not involved in supporting Roma civil society. The mainstream policies and laws described in the NRSF are implemented at the level of local government in Denmark. Denmark has 98 municipalities, and these are considered as local authorities. The municipalities follow the rules concerning local government laid down in the Local Government Act. This means that many of the policies, laws, and regulations referred to in the NRSF have to be implemented and coordinated at municipal level.

3.3. Quality of the plan

In comparison with the previous NRSI, this new NRSF is better elaborated and concretely mentions different mainstream approaches to social inclusion, non-discrimination, integration and participation. However, it has no Roma-targeted interventions and therefore no milestones, funding, or timelines. Consequently, the Danish authorities have

³⁴ European Commission, Directorate-General for Employment, Social Affairs and Inclusion, The 10 common basic principles on Roma inclusion: Vademecum, Publications Office, 2010, <https://data.europa.eu/doi/10.2767/22771>

no particular responsibility for ensuring that the Roma are in fact supported by mainstream measures not only in theory (de jure) but also in practice (de facto).

3.4. Funding

There is no funding mentioned in the NRSF apart from the section on homelessness. Here it is stated that the Danish government will use 3% of the European Social Funds Plus to create a programme for ending homelessness. The programme will specifically focus on three target groups: 1) young persons who live in homelessness (15-24 years); 2) homeless persons who are discharged from hospital or other rehabilitation programmes; and, 3) homeless persons who sleep rough. Of these three categories only the third group could potentially include EU mobile Roma who live in homelessness, since the first two categories concern residents with legal status who have access to juvenile programmes and non-acute health care and rehabilitation.

3.5. Monitoring and evaluation

The NRSF states that Denmark will answer to the EU Commission's reporting requests. It however also states that since Denmark does not register ethnic data, no data or reports will be made concerning specific ethnic groups. Denmark will participate in the EU Fundamental Rights Agency monitoring framework, but no information has been obtained on how the authorities will collect the relevant data for this monitoring process.³⁵ No comments on the draft versions of this monitoring report have been received from the ministries that could have clarified how the future FRA monitoring will be carried out.

3.6. Assessment of the expected effectiveness and sustainability

As stated in the above, the NRSF does not differ much from the previous NRSI, despite being better elaborated about the content of existing mainstream approaches. It has no initiatives that target the Roma and no specific funding or milestones. It is therefore not expectable that the NRSF will result in new initiatives for the Roma or against antigypsyism at local levels.

³⁵ FRA. (2020). *Roma Working Party – Consultations on the Roma inclusion monitoring framework*. European Union Agency for Fundamental Rights. <https://fra.europa.eu/en/news/2020/roma-working-party-consultations-roma-inclusion-monitoring-framework>

4. ALIGNMENT WITH THE EU ROMA STRATEGY

4.1. Reflecting diversity among Roma

There is no mention of Roma women or Roma children in the NRSF. The NRSF does not distinguish between groups of Roma apart from a brief mention that domestic Roma are subject to the same laws as other citizens and legal residents. EU mobile Roma are covered by general legislation concerning EU citizens.

4.2. Combining mainstream and targeted approaches

As mentioned in the above, the NRSF has no initiatives that target the Roma. The NRSF only refers to mainstream approaches. The NRSF does not consider specific local challenges or address barriers that deprive Roma of equal access to mainstream policies. See the discussion of thematic areas in the above (Section 3).

4.3. Usage of instruments introduced by the Council Recommendation

In the introduction, the NRSF states that it responds to the 'Recommendation of the Council of the European Union on Roma equality, inclusion and participation' of 12 March 2021. It states that it follows the recommendation to develop a national strategic framework which includes the Roma in mainstream policies for social inclusion. The NRSF states that it responds to the Council recommendations concerning that all Member States should evaluate the relevance of the Recommendations in their particular national context and adjust them so that the measures are realistic and relevant at local levels. The NRSF also states that it adheres to the minimum obligations set forward in the Council Recommendations.

CONCLUSIONS AND RECOMMENDATIONS

The new NRSF (2021) is better elaborated than the previous Roma strategy (2011) and presents different mainstream approaches towards social inclusion, non-discrimination, integration and participation. It is positive that the NRSF includes the Roma in mainstream policies and strategies. However, the NRSF does not include measures for addressing antigypsyism, not does it include Roma-targeted interventions, thus the NRSF does not include concrete milestones, monitoring activates, funding, or timelines. It does not include a commitment to enhance Roma participation and support the formation of a strong Roma civil society. Consequently, the Danish authorities have no particular responsibility for ensuring that Roma communities are in fact supported by mainstream measures not only in theory (de jure) but also in practice (de facto).

The Danish authorities did not involve Roma communities or Roma representatives in the drafting of the NRSF and it has not been disseminated for comments. Other institutions and organisations of relevance (such as the Danish Institute of Human Rights, DIHR) were also not consulted in the NRSF process. The NRSF does not involve Roma representatives in the monitoring and implementation of activities. Involving Roma communities in the NRSF process would have represented an opportune first step in a process of capacity building for Roma civil society in Denmark.

The NRSF does not address concerns that have been set out by DIHR and the CoE concerning the disproportionate use of Danish legislation against destitute mobile EU citizens who sleep rough in Denmark. It does not respond to the critique set out in 2017 by the CoE that the implementation of the legislation seems to particularly target Roma who live in homelessness in Denmark. Furthermore, the NRSF does not address the antigypsyist rhetoric that has been used by several politicians and ministers in debates concerning homeless migrants who travel to Denmark.

Similar to the previous NRSI, the new NRSF rejects any particular responsibility for supporting Roma communities in Denmark on the basis of the argument that Danish authorities do not collect ethnic data. However, not collecting ethnic data does not exclude creating possibilities for supporting and facilitating the empowerment of Roma civil society and Roma communities. It does not prohibit the allocation of funding for specific activities to support Roma communities to organise and work for Roma inclusion. One particular initiative that is lacking as a basis for forming such concrete initiatives is a research project designed together with Roma communities and Roma researchers for investigating the current situation of Roma inclusion in Danish society. Finally, the lack of ethnic data is not an impediment to initiating concrete initiatives against antigypsyism.

Recommendations to national authorities

1. Allocate funding for Roma-targeted initiatives, including campaigns against antigypsyism and research on the situation of Roma inclusion in Denmark (see recommendation point 9).
2. Strengthen the role of the Roma Contact Point to ensure that it liaises and coordinates with Roma representatives.
3. Alternatively, a Roma Advisory Board could be established to support Danish authorities to develop measures that combat discrimination and enhance Roma participation and inclusion in Danish society.

Recommendations to European institutions

4. Monitor whether the NRSF creates any de-facto changes for Roma inclusion, equality, and participation given that it has no Roma-targeted interventions.

5. In collaboration with the EU Fundamental Rights Agency, invite countries that do not collect ethnic data to consultations about how to support the participation of Roma communities and Roma representatives and how to create initiatives against antigypsyism.
6. Monitor how mobile EU citizens are affected by the implementation of Danish legislation in cases concerning rough sleeping and begging.

Recommendations to civil society

7. For Roma representatives: contact the Roma Contact Point at the Ministry for Immigration and Integration to ensure that Roma representatives are consulted and included in mainstream activities for equality, inclusion and participation.
8. For broader civil society in Denmark: invite Roma representatives to participate in mainstream measures concerning the inclusion of ethnic minorities. Plan and coordinate Roma-targeted initiatives together with Roma communities.
9. Monitor whether and how Danish authorities and private actors discriminate against mobile EU citizens of Roma origin, particularly in cases concerning rough sleeping (camping) and at private camping grounds.

Recommendations to other stakeholders

10. For scholars: Conduct studies together with Roma communities and Roma researchers on the situation of Roma inclusion in Denmark.
11. For private foundations: invite Roma to apply for funds to establish Roma civil society organisations so they can obtain the support that is necessary in the start-up process. Prepare funding calls that involve Roma inclusion so that new initiatives can be supported.

REFERENCES

List of interviews

Interview with representative of the Ministry of Immigration and Integration.

Email correspondence with the Roma Contact Point at the Ministry of Immigration and Integration.

Interviews with staff from Compass at DanChurch Social, who have also provided comments on the draft monitoring report.

Interviews with Roma representatives in Denmark conducted in connection with the previous RCM reports have been included to the extent this is relevant in this report.

Interviews and fieldwork with Romanian Roma who live in homelessness in Denmark.

Interview with representative of the Ministry of Immigration and Integration.

At the time of submission, the author of the report was still waiting for comments from the Ministry of Immigration and Integration and the Danish Institute for Human Rights.

The draft monitoring report was shared with Roma representatives, but no comments were received.

Key policy documents and reports

Anker, Jørgen, Jacob A. Holch and Mia H. Kristensen for Ramboll Management Consulting (2011) *Promoting social inclusion of Roma: a study of national policies*

Barbu, Simona Nicoleta (2020) *Civil society monitoring report on implementation of the national Roma integration strategies: Identifying blind spots in Roma inclusion policy*. Available at:

<https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-3-denmark-2019-eprint-fin.pdf> (last accessed April 2022).

Council of Europe, ResCM(2005)9 *On the implementation of the Framework Convention for the protection of national minorities in Denmark*, available at:

https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805d914f

Council of the European Union (2021) Council Recommendation of 12 March 2021 on Roma equality, inclusion and participation 2021/C 93/01. Available at: [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021H0319\(01\)&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021H0319(01)&from=EN) (last accessed April 2022).

Danish strategy on Roma equality, inclusion and participation in accordance with Council recommendation of 12 March (21/C9310). Prepared by the Ministry of Immigration and Integration. Available at:

https://ec.europa.eu/info/sites/default/files/brurepprn02_brurep4xx05_1854_001.pdf (last accessed April 2022).

Danish Institute for Human Rights (2012) *The situation of Roma*, FRANET National Focal Point, Social Thematic Study, Denmark

Danish Institute for Human Rights (2015) *Parallel report to the Un Committee on the Elimination of Racial Discrimination*, available at:

<https://www.humanrights.dk/publications/parallel-report-un-committee-elimination-racial-discrimination-cerd-2015>

Danish Institute for Human Rights (2016) *Status rapport 2015-2016 "Uregistrerede migranter"*, available at: <https://menneskeret.dk/udgivelser/uregistrerede-migranter-status-2015-16>

Enevig, Anders (1975) *Sigøjnere in Minoritetsproblemer I Danmark*, Gyldendal

European Commission against Racism and Intolerance (ECRI, 2017) *Report on Denmark (fifth monitoring cycle)*, available at: <https://www.coe.int/t/dqhl/monitoring/ecri/country-by-country/denmark/DNK-CbC-V-2017-020-ENG.pdf>

European Commission (2020) A Union of Equality: EU Roma strategic framework for equality, inclusion and participation. European Commission, DG Justice and Consumers. Available at: https://ec.europa.eu/info/sites/default/files/eu_roma_strategic_framework_for_equality_inclusion_and_participation_for_2020_-_2030_0.pdf (last accessed April 2022).

Høiris, Ole (1983) *Fremmede I Danmark*, Forlaget Ålørkke

Jensen, Heidi (1995) "Kulturelle kamæleoner i den kommunale orden: et studie af sigøjnere og danskere i en dansk provinsby", *Specialerække nr. 78*, Institut for Antropologi

Ministry for Social Affairs and Integration (2011) *Presentation to the European Commission of Denmark's National Roma Inclusion Strategy*, available at: https://ec.europa.eu/info/sites/info/files/roma_denmark_strategy_en.pdf

Ministry for Social Affairs and Integration (2011) *Public consultations brief concerning the draft Danish National Roma Inclusion Strategy*, available at: http://ec.europa.eu/justice/discrimination/files/roma_denmark_strategy_annex1_da.pdf

Ravnbøl, Camilla Ida and Simona Barbu (2020). Sundhed blandt uregistrerede og hjemløse migranter. Rådet for Socialt Udsatte. Available at: <https://udsatte.dk/udgivelser/sundhed-blandt-uregistrerede-hjemloese-migranter> (last accessed April 2022).

Ravnbøl, Camilla Ida:

- (2015), "Hjem og arbejde for hjemløse og arbejdsløse EU medborgere; rumænske romaers erfaringer fra København og Malmø" in *Socialmedicinsk Tidsskrift*, 92/3.
- (2017), "Doubling syndemics: ethnographic accounts of the health situation for homeless Romanian Roma in Copenhagen" in *Health and Human Rights Journal*, 19/2 Harvard School of Public Health
- (2018) *Civil society monitoring report on implementation of the national Roma integration strategies: Focusing on structural and horizontal preconditions for successful implementation of the strategy*. Available at: <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-1-denmark-2017-eprint-fin-2.pdf> (last accessed April 2022).
- (2018) *Bottle Hunters: an ethnography of laws and life for homeless Romanian Roma in Copenhagen*, PhD dissertation, published 12.12.2018.
- (2019) *Civil society monitoring report on implementation of the national Roma integration strategies: Assessing the progress in four key policy areas of the strategy*. Available at: <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-2-denmark-2018-eprint-fin.pdf> (last accessed April 2022).

ANNEX: LIST OF PROBLEMS AND CONDITIONS

2.1. Fighting antigypsyism and discrimination

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Antigypsyism not recognised as a specific problem in national policy frameworks	Should be recognised in national policy framework but is not at this stage	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Prejudice against Roma	Evidence shows challenges with prejudice and anti-Roma sentiments in political discourses	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Hate crimes against Roma	No statistics since ethnic data is not registered in Denmark.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Hate speech towards and against Roma (online and offline)		No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Weak effectiveness of protection from discrimination	Ethnic data is not registered in Denmark and ethnic minorities are covered by mainstream policies and laws concerning non-discrimination	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Segregation in education, housing, or provision of public services	No statistics since ethnic data is not registered in Denmark.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Forced evictions and demolitions leading to homelessness, inadequate housing, and social exclusion	No statistics since ethnic data is not registered in Denmark. Presumably the "ghetto laws" can potentially affect Roma families.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF

Statelessness, missing ID documents	No statistics since ethnic data is not registered in Denmark.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Misconduct and discriminatory behaviour by police (under-policing/under-policing)	No statistics since ethnic data is not registered in Denmark. This is a general concern since recent studies show ethnic biases and discriminatory behaviour by police against young men of non-Danish ethnic origin.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Barriers to <i>de facto</i> exercise of EU right to free movement	Danish regulations concerning working contracts and housing set a limit to obtaining registration as an EU worker with a social security number, which grants access to social services. Non-registered EU citizens are not entitled to social services and assistance.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF

2.2. Education

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Lack of available and accessible pre-school education and ECEC services for Roma	No statistics since ethnic data is not registered in Denmark.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Lower quality of pre-school education and ECEC services for Roma	No statistics since ethnic data is not registered in Denmark.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
High drop-out rate before completion of primary education	No statistics since ethnic data is not registered in Denmark.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF

Early leaving from secondary education	No statistics since ethnic data is not registered in Denmark.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Secondary education/vocational training disconnected from labour market needs	No statistics since ethnic data is not registered in Denmark.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Misplacement of Roma pupils into special education	No statistics since ethnic data is not registered in Denmark. No statistics since ethnic data is not registered in Denmark. No data to indicate this as a concern	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Education segregation of Roma pupils	No statistics since ethnic data is not registered in Denmark. This was previously a concern in Elsinore but the Roma classes were officially shut down in 2007. Need for more research to evaluate whether this is a concern today.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Increased selectivity of the educational system resulting in concentration of Roma or other disadvantaged pupils in educational facilities of lower quality	No statistics since ethnic data is not registered in Denmark. No data to indicate this as a concern	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Limited access to second-chance education, adult education, and lifelong learning	No statistics since ethnic data is not registered in Denmark. No data to indicate this as a concern	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Limited access to and support for online and distance learning if education and training institutions close, as occurred during the coronavirus pandemic	No statistics since ethnic data is not registered in Denmark. No data to indicate this as a concern	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Low level of digital	No statistics since	No Roma	No measures	No targets targeting

skills and competences and limited opportunities for their development among pupils	ethnic data is not registered in Denmark. No data to indicate this as a concern	targeted interventions in the NRSF. Roma are covered by mainstream policies.	concerning the Roma in the NRSF	Roma in the NRSF
Low level of digital skills and competences and limited opportunities for their development among adults	No statistics since ethnic data is not registered in Denmark. No data to indicate this as a concern	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF

2.3. Employment

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Poor access to or low effectiveness of public employment services	No statistics since ethnic data is not registered in Denmark.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Youth not in employment, education or training (NEET)	No statistics since ethnic data is not registered in Denmark. No data to indicate this as a concern	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Poor access to (re-) training, lifelong learning and skills development	No statistics since ethnic data is not registered in Denmark. No data to indicate this as a concern	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Discrimination on the labour market by employers	No statistics since ethnic data is not registered in Denmark. Interviews with EU citizens of Roma origin indicate that there are concerns with discrimination and biases towards Roma by employers	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Risk for Roma women and girls from disadvantaged areas of being subjected to trafficking and forced prostitution	No statistics since ethnic data is not registered in Denmark. Interviews with social workers and organisations working with anti-trafficking indicate that there are	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning Roma women and girls in the NRSF	No targets targeting Roma women and girls in the NRSF

	concerns for Roma women and girls from EU member states who are at risk of trafficking to Denmark.			
Primary labour market opportunities substituted by public work	No statistics since ethnic data is not registered in Denmark.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Barriers and disincentives to employment (such as indebtedness, low income from work compared to social income)	No statistics since ethnic data is not registered in Denmark. Interviews with EU citizens of Roma origin who live in homelessness in Denmark show that many trapped in indebtedness since they have no formal income opportunities in their countries of origin. They take out expensive loans with local money lending companies or moneylenders at high interest rates (up to 30% a month). Consequently, many travel abroad to make a living and earn money to repay debt at home.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Lack of activation measures, employment support	No Roma targeted interventions exist in Denmark	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF

2.4. Healthcare

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Exclusion from public health insurance coverage (including those who are stateless, third country nationals, or EU-mobile)	Roma who are Danish citizenship or a residence permits are entitled to free public health care. EU citizens who are	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF

	<p>unregistered and who do not hold private insurance only have access to emergency health care treatment in Denmark. They do not have access to private practitioners, follow up treatment or non-acute health care. This potentially affects EU citizens of Roma origin. Interviews with homeless Roma show that they often have comorbidities that are left untreated because they only have access to emergency health care treatment. This means that follow up medical care or non-acute medical care is not accessible, nor is alcohol or drug treatment. Consequently, many experience deterioration of their health.</p>			
Poor supply/availability of healthcare services (including lack of means to cover out-of-pocket health costs)	See previous point	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Limited access to emergency care	Everyone in Denmark has access to emergency health care	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Limited access to primary care	See previous point about unavailability of medical care services apart from emergency health care to unregistered EU citizens who do not hold travel insurance.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Limited access to prenatal and postnatal care	See previous point. Non-registered EU citizens without private medical	No Roma targeted interventions in the NRSF. Roma	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF

	insurance can only access prenatal and postnatal care in emergency situations. They can get non-acute prenatal care at the Red Cross Clinic for Undocumented Migrants (private NGO)	are covered by mainstream policies.		
Limited access to health-related information	Health information in Denmark is usually disseminated in Danish but also at times in English and in some of the larger minority languages including Serbo-Croatian, which some Danish Roma speak. Some private organisations publish information in languages that many homeless migrants speak in Denmark such as Romaan (e.g. the Red Cross Clinic).	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Poor access to preventive care (vaccination, check-ups, screenings, awareness-raising about healthy lifestyles)	See above points	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Poor access to sexual/reproductive healthcare and family planning services	See above points	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Specific barriers to better healthcare of vulnerable groups such as elderly Roma people, Roma with disabilities, LGBTI and others	See above points	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Discrimination/ antigypsyism in healthcare (e.g., segregated services, forced sterilisation)	No data. There is a need to study the experiences of the national Roma population in relation to health care in Denmark.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF

Inequalities in measures for combating and preventing potential outbreaks of diseases in marginalised or remote localities	All Danish citizens have free public health care including the national Roma population.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
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2.5. Housing, essential services, and environmental justice

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Poor physical security of housing (ruined or slum housing)	The national Roma population who have Danish citizenship or legal residence have access to housing and essential services. EU citizens of Roma origin who do not have legal residence or who are unregistered do not have access to housing assistance and most often only access private shelters run by NGOs.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Lack of access to drinking water	See above point. No data to indicate this is a concern	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Lack of access to sanitation	See above point. No data to indicate this is a concern for national Roma. For homeless Roma persons there are limited possibilities for sanitation (this affects all persons living in homelessness)	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Lack of access to electricity	See above point. No data to indicate this is a concern for national Roma. For homeless Roma persons there are limited possibilities (this affects all persons living in	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF

	homelessness)			
Limited or absent public waste collection	No data to indicate this is a concern	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Restricted heating capability (families unable to heat all rooms/all times when necessary) or solid waste used for heating	Need for more research on this topic	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Lack of security of tenure (legal titles are not clear and secure)	Need for more research on this topic	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Lacking or limited access to social housing	The national Roma population who have Danish citizenship or legal residence have access to housing and essential services. EU citizens of Roma origin who do not have legal residence or who are unregistered do not have access to housing assistance and most often only access private shelters run by NGOs	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Overcrowding (available space/room for families)	Need for more research on this topic	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Housing-related indebtedness at levels which may cause eviction	Need for more research on this topic	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Housing in segregated settlements/ neighbourhoods	No ethnic data available	No Roma targeted interventions in the NRSF. Roma are covered by	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF

		mainstream policies.		
Housing in informal or illegal settlements/ neighbourhoods	Not a concern for national Roma. Homeless EU citizens of Roma origin experience that their camps are demolished and are charged with violating Danish legislation which prohibits camping in public spaces.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Exposure to hazardous factors (living in areas prone to natural disasters or environmentally hazardous areas)	N/A	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Limited or lacking access to public transport	No data that should indicate this as a concern but this topic has not been thoroughly researched.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Limited or lacking internet access (e.g., public internet access points in deprived areas, areas not covered by broadband internet)	No data that should indicate this as a concern but this topic has not been thoroughly researched.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Limited or lacking access to green spaces	No data that should indicate this as a concern but this topic has not been thoroughly researched.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Roma excluded from environmental democracy	No data that should indicate this as a concern but this topic has not been thoroughly researched.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF

2.6. Social protection

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
High at-risk-of-poverty rate and material and social deprivation	The national Roma population has citizenship or legal residence and therefore access to social services including social benefits, housing support, employment support etc. There is however a need to study the situation of the national Roma population including their economic situation. In regards to EU citizens of Roma origin, poverty is a concern for those migrants who come from poverty and marginalised conditions in their home countries. With limited network, education and language skills they struggle to find employment and therefore affordable housing in Denmark. Hence, some end up living in homelessness.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Income support programmes fail to guarantee an acceptable level of minimum income for every household	See above point	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Limited access to income support schemes (low awareness, barrier of administrative burdens, stigma attached)	See above point	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Ineffective eligibility rules (well-designed means-testing ensures that those who need support can get it; job-search conditions)	See above point	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF

ensure the motivation for returning to work)				
Low flexibility of income support programmes for addressing changing conditions of the household	See above point	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Discrimination by agencies managing income-support programmes	Interviews with Danish Roma indicate that some experience prejudice and discrimination in society and hide their Roma identity for this reason. There is a need for more research on this topic.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Risk of municipalities misusing income support to buy votes	Not a concern	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF

2.7. Social services

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Limited quality, capacity and comprehensiveness of help provided by social services	The national Roma population has citizenship or legal residence and therefore access to social services. There is however a need to study the situation of the national Roma including how they experience their everyday lives in Danish society and contact with institutions/authorities and majority society. History shows that Roma have experienced discrimination in Danish legislation and in society and for this reason there is a need for more research in their contemporary situation. In regards to EU citizens of Roma	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF

	origin, poverty is a concern for those migrants who come from poverty and marginalised conditions in their home countries. With limited network, education and language skills they struggle to find employment and therefore affordable housing in Denmark. Hence, some end up living in homelessness.			
Limited access to social services: low awareness of them, low accessibility, (e.g., due to travel costs) or limited availability	See above point	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Services providers do not actively reach out to those in need	See above point	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Limited ability of social services to effectively work together with other agencies (e.g., public employment service) to help clients	See above point	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Discrimination by social service providers	See above point	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Lack of adequacy of programmes for addressing indebtedness (providing counselling and financial support)	See above point	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF

2.8. Child protection

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Child protection not considered in the NRSF	No data to indicate that this is a	No Roma targeted	No measures concerning the	No targets targeting Roma in the NRSF

	<p>concern for national Roma but there is a need to study the situation of the national Roma population in Denmark.</p> <p>In regards to Roma children from EU member states who travel to Denmark, there is data to suggest some concerns. For example, in 2020 a social service counselling centre in Copenhagen for families, children and youth (in Danish: Den Sociale Døgnvagt) on several occasions expressed concern about encountering Roma minors living in homelessness in Copenhagen. There is a need to study further whether this remains a concern and how many Roma minor that the counselling centre encounters.</p>	<p>interventions in the NRSF. Roma are covered by mainstream policies.</p>	Roma in the NRSF	
Specific vulnerability of Roma children as victims of violence not considered	See above point	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Segregated or discriminatory child-protection services provided to Roma	See above point	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Activities aimed at strengthening parental responsibility and skills not available or not reaching out to Roma parents	See above point	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Illegal practices of child labour	Need for more research.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF

Large-scale and discriminatory placement of Roma children in early childhood care institutions	There is not data to indicate this as a concern.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Persistence of large-scale institutions rather than family-type arrangements	There is not data to indicate this as a concern.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Early marriages	Need for more research.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Barriers to children's registration; statelessness	There is not data to indicate this as a concern.	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Biased treatment of Roma youth by security and law enforcement	Need for more research	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Inadequate child/ adolescent participation	Need for more research	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF

2.9. Promoting (awareness of) Roma arts, culture, and history

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Poor or lacking awareness of the general population of the contribution of Roma art and culture to national and European heritage	Need for more research	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Exclusion of Roma communities from national cultural narratives	There is limited mentioning of Roma in Danish history books and the Roma are not	No Roma targeted interventions in the NRSF. Roma are covered by	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF

	recognised as a national minority in Denmark. The history of the Roma in Denmark or in Europe in general is not part of the curricula in Danish schools.	mainstream policies.		
Roma history and culture not included in school curricula and textbooks for both Roma and non-Roma students	See above point	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF
Lack of inclusion of Roma language in schools, and development of necessary educational materials and resources for Roma language preservation and teaching	See above point. There are no Romanés language classes in Denmark and no material for Roma language preservation and teaching	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.
Lack of memorialisation of Roma history through establishing monuments, commemorative activities, and institutionalizing dates relevant to Roma history	See above point	No measures concerning the Roma in the NRSF	No targets targeting Roma in the NRSF	No Roma targeted interventions in the NRSF. Roma are covered by mainstream policies.

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