



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

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of the national strategic framework
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LIST OF ABBREVIATIONS

ATU	Administrative and Territorial Unit
CEDAW	Committee on the Elimination of Discrimination against Women
CLLD	Community Led Local Development
CoE	Council of Europe
COR	County Office for Roma
CSO	Civil Society Organisation(s)
DG JUST	Directorate General Justice and Consumers
ECHR	European Court of Human Rights
FRA	Fundamental Rights Agency
GSG	General Government Secretariat
ICIMES	Interministerial Committee for the Implementation, Monitoring and Evaluation of the Strategy
LAG	Local Action Group
LIG	Local Initiative Group
MCS	Ministerial Commission for Roma
MDPWA	Ministry of Development, Public Works, and Administration
ME	Ministry of Education
MH	Ministry of Health
MIEP	Ministry of Investments and European Projects
MS	EU Member States
MWG	Mixed Working Group
NAE	National Agency for Employment
NAEOWM	National Agency for Equal Opportunities between Women and Men
NAR	National Agency for Roma
NCCD	National Council for Combating Discrimination
NCPR	National Contact Point for Roma
NCRC	National Centre for Roma Culture
NGO	Non-Governmental Organisation
NIS	National Institute for Statistics
NRIS	Strategy for the Inclusion of Romanian Citizens Belonging to the Roma Minority for the Period 2015 – 2020
NRRP	National Recovery and Resilience Plan
NRSF	The Strategy for the Inclusion of Romanian Citizens Belonging to the Roma Minority for the Period 2022-2027
OPAC	Operational Programme Administrative Capacity
OPHC	Operational Programme Human Capital
OPEE	Operational Programme Education and Employment
OPISD	Operational Programme Inclusion and Social Dignity
SEE	South East Europe
WGRH	Working Group on Roma Housing

EXECUTIVE SUMMARY

As a Member State of the European Union, Romania has committed to contributing to meeting the objectives of the *EU Roma Strategic Framework for Equality, Inclusion and Participation*. This is reinforced in the context of the strategic planning of a new funding framework for the period 2021-2027.

The Romanian Government has adopted the new National Roma Strategic Framework (NRSF) on 28 April 2022 as a result of an extended process that started in February 2020, following a consultation process with Roma and pro-Roma NGOs and community-based organisations, as well academics, experts, etc. There was a consistent interinstitutional consultation process, both with Ministries and the sub-national administration, organised by the NAR and the NRCP during 2020 that was influenced by the applicable public policy development rules, pandemic-related constraints, and other government priorities, all of which prolonged the process. Also, the governmental focus on the National Programme for Resilience and Recovery during 2021 left the Roma issue, again, very low on the public agenda priorities.

Participation

The NRSF development process involved the participation of both the Roma civil society organisations and the local, county, and regional Roma experts, mediators, facilitators, and the staff of local and county authorities responsible for Roma issues, especially from 2017 to 2019, while institutional partners joined this process after the publication of the first draft, as of February 2020. However, in the last phase, when the interministerial consultation elaborated the final strategy document, Roma organisations' participation vanished and not all agreements achieved earlier were taken into consideration. Certain issues proposed by Roma organisations were considered to be too specific or not necessarily having an ethnic/Roma dimension; additionally, issues covered in other national or mainstream sectoral strategies were not included in the NRSF.

Relevance

The NRSF continues to build on the ten common basic principles on Roma inclusion, in line with the EU Roma Framework,¹ and consistently identifies the main challenges and needs of the Roma in all the main policy areas, albeit giving only passing mentions and not offering sufficient details and context to some of the issues. The NRSF explicitly identifies racism and anti-Roma attitudes as an important factor generating inequalities across all relevant policy fields. But, when it comes to the actual measures proposed to address the specific problems of each such field, their relevance and, more critically, the probability of implementing and properly monitoring such measures, it is largely inconsistent. This is a common thread for most of the policy areas addressed by the NRSF, as lack of quantifiable indicators and clear budget allocation make the proposed measures seem more like general suggestions rather than specific, well-designed policies.

Expected effectiveness

There are a few issues regarding effectiveness that have come up often during the interviews and the perusing of the Strategy: the financing mechanisms, the monitoring

¹ 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>

and implementation and the resources allocated to the Strategy – particularly human resources and Roma experts.

The financing mechanisms of the Strategy are solely mentioning national funds as the primary source, whereas Structural Funds and other non-reimbursable funds should be focusing on additional support in localised interventions. There is a lot of scepticism that Roma inclusion – particularly in mainstream policies – can be fully covered by national funds, yet previous experience has shown that relying solely on external funding is not enough to support the Strategy implementation.

The monitoring and implementation mechanism, almost the same as in previous strategies, may be considered impractical, while the coordination of all stakeholders involved requires a lot of time and effort. The availability of human resources, as well as their sufficiency, was also approached as a potential concern in relation to the effectiveness of the Strategy implementation.

More efforts are needed to undertake independent large-scale evaluations of government programmes, as well as experimenting and upscaling, to discontinue ineffective approaches, and generate learning experiences that become public policies. The main recommendation regarding the expected effectiveness of the Strategy is to start its monitoring as soon as possible and identify as many risks as possible that could occur and implement mitigation measures in real time.

Alignment with the EU strategic framework

The NRSF generally covers the action areas proposed by the EU Framework in terms of thematic priorities - education, employment, health, and housing but it is missing the focus on essential services, as well as adding Roma identity and culture as an important theme. As for the horizontal priorities (antigypsyism, social exclusion, poverty, and participation), the NRSF focuses on the fight against discrimination, hate speech and hate crime, ensuring funding and synergies with other programmes – missing on the antigypsyism focus.

Even if it is expected for specific objectives and measures for Roma women, children and young people, people with disabilities, elderly Roma, etc. to be developed within the NRSF, unfortunately, the newly adopted strategy fails in adequately representing the Roma women and does not contain a concrete and intersectional approach to the needs of Roma women in all covered areas. Also, domestic and gender-based violence against Roma women and children is not addressed by the NRSF, although it is a violation of their rights, violence being a major obstacle in emotional and socio-economic development, as well as in the exercise of other fundamental rights and freedoms.

The NRSF took on a small number of gender indicators and introduced awareness raising campaigns on gender-based violence in the field of health, overlooking the objectives and special measures for Roma women and children. Although the NRSF repeatedly mentions the intersectional approach to the problems of the Roma community, it does not address all vulnerable groups within this community with specific measures and indicators. Other groups, such as people with disabilities, the elderly Roma, EU mobile citizens, stateless Roma, and non-EU Roma, are not included in any area, measure or indicator.

The fact that most of the measures in the strategy are targeted at Roma communities is not necessarily a positive aspect; issues such as poverty and inclusion do not concern the Roma exclusively, but the entire vulnerable population in Romania, which includes the Roma. As an umbrella document for Roma policies, the NRSF does not sufficiently address the diversity of Roma people and their specific problems. On the other hand, the NRSF, insofar as it succeeds in being implemented, can be beneficial for the inclusion of all Roma groups in their diversity and socio-economic context.

INTRODUCTION

National Roma strategic framework

Romania is a country with a significant Roma population and facing a multitude of complex, interrelated problems. From 2015 to 2020, a 'National Roma Inclusion Strategy' was set in place² but after its expiration in 2020, the government failed to adopt a new public policy document aimed at improving the situation of the Roma, although the new strategic framework for the equality, inclusion and participation of Roma in EU countries has opened a new page at European level for the improvement of the Roma situation.

It was only in 2019, in the context of the Romanian Presidency of the European Council (January-June 2019) that the Roma issue was raised again on the governmental agenda. After several rounds of consultations with the most important public and private stakeholders, a draft Government Decision for approving the Romanian Government's Strategy for the Inclusion of Romanian Citizens Belonging to the Roma Minority for the Period 2021-2027 was sent to the Romanian Government for approval on 15 July 2021.

In the last two years, Romania has gone through a phase of political instability, namely a succession of three governments, and the Strategy document was not approved by any of these governments. The adoption³ (28 April 2022) of the 'Strategy for the Inclusion of Romanian Citizens Belonging to the Roma Minority for the Period 2022-2027' came under a certain difficult context generated by the Covid19 pandemic and, more recently, by the war waged by the Russian Federation against Ukraine and its significant economic consequences. However, there is no excuse for the Romanian Government in delaying the process for over a year.

The NRSF adoption was perceived as a positive development by the Roma civil society in Romania and, even if for 2022, the actual budget allocations for implementation may not be available, there are premises to provide for the measures foreseen in the Strategy in the public budget for 2023 and the following years.

About this report

The present report was prepared as part of the initiative 'Preparatory Action - Roma Civil Monitoring - Strengthening Capacity and Involvement of Roma and pro-Roma Civil Society in Policy Monitoring and Review' funded by the European Commission, Directorate-General for Justice and Consumers, as part of a more complex approach of the European Commission to empower the Roma civil society, to give its voice in relation to the national and international governmental structures.

The report, developed according to the guide provided by the consortium that manages the 'Roma Civil Monitoring' Programme, focuses on a few key issues in the process of developing and adopting strategic public policy documents for Roma:

- Roma participation in the design, implementation, monitoring, and evaluation of the NRSF;
- The relevance of the NRSF to the needs of the Roma given their diversity;

² Government Decision no. 767/16 September 2015, regarding the amendment of the annex to G.D. no. 18/2015 for the approval of the Romanian Government's 'Strategy for the Inclusion of Romanian Citizens Belonging to the Roma Minority for the Period 2015 – 2020'. Available at: <https://legislatie.just.ro/Public/DetaliuDocumentAfis/171526>

³ Government Decision no. 560/28 April 2022, published in the Official Gazette no. 450 bis/5. V.2022, for the approval of the 'Strategy for the Inclusion of Romanian Citizens Belonging to the Roma Minority for the Period 2021-2027'. Available at: <http://anr.gov.ro/images/2022/Monitorul-Oficial-Partea-I-nr.-450Bis.pdf>

- Expected effectiveness of NRSF;
- Alignment of NRSF with the new EU strategic framework for Roma.

Methodology

The report was elaborated by a coalition of eight Roma non-governmental organisations, currently the most active in the field of programmes for Roma communities, covering a wide range of areas, including governance, anti-discrimination, education, community development, culture, employment, entrepreneurship, health, etc.

Based on the above-mentioned guide, the team working on the report used a variety of available sources of information, from documents belonging to national and international public authorities to independent reports, opinions of experts and researchers in the field, etc.

Within the coalition, the distribution of tasks was discussed and agreed, from conducting interviews to taking on the drafting of various sections, based on organisational expertise.

For the documentation of the report, both public policy documents and public normative acts (decisions, ministerial orders, laws, EU documents, strategies, etc.), as well as documents prepared by civil society organisations or other researchers (surveys, programmes, projects, reports, etc.) were used.

A total of 26 interviews (face-to-face, telephone, e-mail or online) were conducted, covering a wide range of public institutions at central, regional, and local levels, experts, and researchers, as well as the most important representatives of Roma non-governmental organisations. Some of the interviews were not covering all the aspects of the NRSF but more specific expertise information.

An informed consent form was prepared for the interviewees to secure their permission to record and subsequently transcribe the interview, as well as to use their personal data (name, institutional affiliation) and to cite their relevant answers in the report. All interviews were transcribed and made available to all contributors.

The report was initially prepared in Romanian to provide first-hand documenting and writing experience for many activists from the coalition member organisations. The preparation of the different sections required the coordinator's collaboration with each contributor, in a genuinely learning approach. The report was subsequently translated into English, ensuring a unified writing style.

1. PARTICIPATION

1.1. Roma participation in the NRSF preparation

The Romanian Government's 'Strategy for the Inclusion of Romanian Citizens Belonging to the Roma Minority for the Period 2021-2027' (NRSF hereafter in this text) is expected to reflect, at least at the declarative level, the needs and real problems of Roma communities across the country, rather than just being a formal document prepared in government offices and by people who are disconnected from the reality of the communities.

As concerns the participation of Roma organisations, specialists, and experts in the development of the Strategy, we were able to identify several stages of this process:

- 2017-2019 - The Consultative Council of the NAR (over 70 organisations, more or less active and experienced, together with representatives of local public and county authorities, civil society and the Roma community⁴ actively participated in structuring the NAR's 'Public Policy Recommendation on Roma Inclusion for the period 2021-2027'⁵).
- 2020 - The level of participation of the civil society decreased – due to the Covid19 pandemic and the formal governmental procedures for consultation.
- August-September 2020, the NAR organised eight regional meetings; the version presented for approval was discussed with the Consultative Council and the draft Strategy was formally launched for public consultation⁶ (6 – 23 November 2020); 19 institutions and organisations offered feedback, of which six CSO, including the ERGO network.
- 2021-2022 – The political instability was probably a decisive factor regarding the approval of the Strategy, even though its text has not undergone significant changes or additions. However, there was no significant participation and consultation of key civil society stakeholders during this period,⁷ it was a rather technical and formal communication between the NAR and the relevant ministries.

On 28 April 2022, the Romanian Government adopted a final version of the NRSF for the period 2021-2027,⁸ indicating a new approach that is in line with the EU Roma strategic framework.⁹ According to some of the interviewees, the recommendations and inputs formulated and submitted by the organisations during the public consultation were not included in the NRSF, although, in their opinion, they were meaningful and relevant. On the other hand, the authorities involved (NAR,¹⁰ NCPR, and MIEP¹¹ in particular)

⁴ Online interview with Daniel Rădulescu, ex-President of the National Agency for Roma. 16 March 2022, Bucharest.

⁵ See <http://anr.gov.ro/images/Site2020/Documente/ANR---Text-prezentare-noua-viziune-a-viitoareii-NRIS-2021-2027---19.02.2020-FINAL-pentru-website.pdf>

⁶ Law no. 52/2003 on decisional transparency within public administration.

⁷ Information provided by several representatives of the Roma organisations interviewed.

⁸ Government Decision no. 560/28 April 2022, published in the Official Gazette no. /5 May 2022, for the approval of the 'Strategy for the Inclusion of Romanian Citizens Belonging to the Roma Minority for the Period 2022-2027'.

⁹ EC COM COM(2020) 620, *EU Roma Strategic Framework for Equality, Inclusion and Participation*; Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0620> Council of the EU. *Council Recommendation on Roma Equality, Inclusion and Participation* [2021/C93/01] of 12 March 2021. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AJOC_2021_093_R_0001

¹⁰ Telephone interview with Iulian Stoian, Head of Office for Public policies, National Agency for Roma, 4 April 2022, Bucharest.

considered that some of the proposals and suggestions referred to either extremely specific issues (related to health, education, housing, or employment), or to issues that do not necessarily have an ethnic dimension, or to issues covered in other national strategies, with which further correlation must be made.

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

The NRSF is focusing mostly on governmental structures and does not specifically frame Roma participation as a horizontal priority, as the EU Roma Framework is asking for meaningful Roma participation in all stages of the policy-making process. Although one of the premises of the strategy's existence is the permanent contact and the partnership of its initiators with the civil society in all implementation, monitoring, evaluation, review and updating stages of the NRSF,¹² it does not include a capacity-building component to promote the active participation of civil society in all stages of the policy-making process.

The NRSF considers the "implementation of a training/professional development programme for the NAR and the NCPD staff within MIEP in the field of public policy cycle"¹³ to be a capacity building measure for combating discrimination against the Roma. It envisages national training and professional development programmes, including for the COR¹⁴ and for people working in public structures and institutions whose jobs involve providing public services to Roma people.

In addition to the experts from the COR and the City Halls (local experts), all the specialists who deal with school or health mediation, some of the community assistants and some of the social workers are of Roma ethnicity. The Roma human resources are supposed to work as a team in developing, implementing, and monitoring the plan of measures for Roma inclusion at the local level.¹⁵ Hiring local experts on Roma issues is a decision taken at the local level, depending on the resources available, political will, the advocacy capacity of the civil society, etc. In addition, LAGs (consisting of Roma and non-Roma representatives of local institutions) and LIGs (consisting of members from the Roma communities) will be organised as consultation structures.

At the county level, through the Prefect's Office, the COR are organised "consisting of at least three experts/public servants from the execution and/or management apparatus, one of the experts being the consultant for/expert on Roma issues within the Prefect's Institution acting as coordinator of the COR".¹⁶ Where such a position does not exist, it shall be especially created in the organisational chart based on the 'EU Council Recommendation' embraced by Romania in 2021.¹⁷

1.3. System of policy consultation with civil society and stakeholders

Starting with 2017, the NAR reorganised the Consultative Council for Public Policies for Roma, and organised meetings and public consultation events on public policies for

¹¹ Online interview with Claudia Magdalena, Head of Office Evaluation of Social Cohesion Programmes and Policies (coordination of NCPD) and Elena Iordănescu, National Contact Point for Roma within MIPE. 22 March 2022, Bucharest.

¹² NRSF, 5. NRSF Objectives.

¹³ NRSF, 7.2.4. Implementation at the Central Level

¹⁴ Annex A – Institutional Implementation Framework of NRSF

¹⁵ NRSF, Annex 7, I.2 Implementation of the Strategy at the Local Level

¹⁶ NRSF, Annex 7, I.1 Implementation of the Strategy at the County Level

¹⁷ See: [https://eur-lex.europa.eu/legal-content/RO/TXT/PDF/?uri=CELEX:32021H0319\(01\)&qid=1640184466697&from=RO](https://eur-lex.europa.eu/legal-content/RO/TXT/PDF/?uri=CELEX:32021H0319(01)&qid=1640184466697&from=RO)

Roma in Romania, focusing on the priority intervention areas targeted by the Roma Inclusion Strategy. A project funded through OPAC¹⁸ developed a comprehensive process for the coalition and consultation of Roma and pro-Roma civil society - the so-called National Assembly of Roma Non-Governmental Organisations.¹⁹ Under this umbrella, a series of consultations were organised at local and county level, initially facilitated by the team of *Împreună* Agency and, later, together with the NAR representatives. As a result of the project, a public policy proposal for the new Roma inclusion strategy was developed and submitted to the NAR, including a paradigm shift by supporting the creation of national sectoral programmes as a mechanism for financing measures and the involvement of the Roma community in all stages relevant to public policies for Roma.²⁰

While the current version of NRSF includes substantiating information regarding the socio-economic situation of the Roma communities, it has failed to include the measures and the vision proposed by the mentioned public policy proposal.²¹ However, the consultation process with state institutions began only after the text of the Strategy was drafted; the process was supported by the NCPR and coordinated by the NAR and along the way, the ministries involved provided their views and sometimes operated changes in the text of the NRSF.²²

1.4. Empowerment of Roma communities at the local level

The NRSF indirectly targets, through the priority fields, Roma empowerment at the local level. However, no specific measures have been identified regarding the empowerment of the Roma in relation to public administration, to self-organise and become real partners or to participate in the decision-making processes concerning their lives. The previous NRIS did not focus either on the empowerment issue. The NRSF is a governmental document and the Romanian state institutions do not have the practice to actively involve citizens in the development process due to the possible risk of being criticised, monitored, and even held accountable. The way the NRSF promotes community engagement is through the participation of the ATU and LAG representatives in the implementation and monitoring process and by initiating institutional collaboration protocols. Again, the lack of capacity is hindering the actual participation of Roma in the process.

Most of the interviews with the NAR, NCPR/MIEP, and experts highlight that the integrated approach funded by the OPHC 2014-2020, *priority axis 4 - Social inclusion and combating poverty* can increase the capacity and enhance the empowerment of Roma communities. However, these aspects can only be assessed upon the closure of OPHC 2014-2022 (end of 2023), while the new programming period is expected to continue the approach, with positive impact on Roma empowerment.

¹⁸ For further information, see: <https://www.facebook.com/coalitiapentruromi/>

¹⁹ *Împreună* Community Development Agency, 'Coalition for Roma: Development and Monitoring of Public Policies' Project. At the meeting of the National Assembly of Roma Non-Governmental Organisations in December 2019, the needs of Roma communities were discussed and a 3-point memorandum was prepared, reiterating the points mentioned in the Ibaşfalău Declaration of April 1919: (1) Roma do not yet have equal rights with the rest of the population, (2) Roma ethnic identity is insufficiently prioritised and promoted, (3) government strategies have not allocated resources to improve Roma inclusion.

²⁰ Online interview with Gelu Duminičă, Executive Director of *Împreună* Community Development Agency, 29 March 2022, Bucharest.

²¹ *Ibidem*.

²² Telephone interview with Iulian Stoian, Head of Public Policy, National Agency for Roma, 4 April 2022, Bucharest. Interviews with Claudia Magdalena, Head of Evaluation of Social Cohesion Programmes and Policies (NCPR in coordination) and Elena Iordănescu, National Contact Point for Roma within MIPE, 22 March 2022, Bucharest.

1.5. Capacity-building of Roma civil society

Within the NRSF, there are no concrete and consistent measures to strengthen the capacity of Roma CSOs, even if past lessons have been important and civil society has been involved in the development process and is assigned a role, at least theoretically, in the monitoring and evaluation of NRSF, without specifying the concrete ways in which the civil society will be empowered.

Also, there are no concrete measures to promote cooperation between Roma CSOs and mainstream organisations, especially those dealing with youth, children, or women's rights. We also did not find plans to create umbrella organisational structures, using public funding, to take over the development of major programmes and projects.

2. RELEVANCE

2.1. Fighting antigypsyism and discrimination

In its latest report, the NCCD emphasises that discrimination against the Roma constitutes a serious increasing concern. In addition, the interviewees identify racism and discrimination as the underlying issues of all other major obstacles and challenges Roma are facing in all areas, thus reducing their chances to develop as human beings, limiting their access to social services, health, labour market, public and political life, justice, etc.²³ The Covid19 pandemic has led to a rise in the discrimination and harassment of Roma, manifested through strong anti-Roma rhetoric by portraying Roma as a threat to the majority of the population, making them scapegoats for the spread of the virus; police violence in Roma communities has also been reported.²⁴

The current NRSF recognizes the problem of antigypsyism and anti-Roma attitudes that generate discrimination, one of its horizontal objectives being to “Improve the existing legislative and normative framework for combating discrimination, anti-Roma speech and attitudes that generate hate speech or hate crimes.” It further identifies the need to prevent and combat discrimination against representatives of public institutions, as well as combat institutional racism and anti-Roma attitudes in society.

Furthermore, it recommends “a preventive and proactive dimension to combating anti-Roma attitudes with an emphasis on promoting a positive discourse on Roma in the public sphere, educating the majority of the population in this regard and raising awareness of their negative consequences”.²⁵ The proposed plan of measures is primarily aimed at combating institutional racism in the public and private spheres, monitoring hate speech, preparing reports, conducting awareness campaigns, and creating educational materials.

On one hand, the NRSF has certain new and ambitious elements in the field of combating discrimination, hate speech, and hate crimes. On the other hand, the measures provided are insufficient or insignificant compared to the size of the antigypsyism in Romania.²⁶

2.2. Education

Roma students continue to face problems in the education system, namely early school leaving, poor quality of education, racism, and ethnic segregation despite the many public policy measures implemented in recent decades.²⁷ The FRA found that in 2016 in Romania the rate of Roma students’ early school leaving was 77%, being the second highest rate in the European Union, after Greece (69%), that eight out of ten Roma children leave school early, and the enrolment rate for Roma children between the age of three and six years old is well below the national average, 38% for Roma children vs.

²³ Interview with Mihai Neacșu, Daniela Tarnovski, Costel Bercuș, Marian Ursan.

²⁴ NCCD Activity Report 2021: <https://www.NCCD.ro/wp-content/uploads/2022/04/Raport-de-activitate-NCCD-2021-.pdf>

²⁵ NRSF, Annex 6, Specific Objective 6: Combating Discrimination, Anti-Roma Speech and Attitudes That Generate Hate Speech or Hate Crimes.

²⁶ Online interview with Delia Grigore, President Amare Romentza, 22 March 2022, Bucharest. Interview with Simona Toroțcoi, UNICEF Educational and Roma Inclusion Consultant, 31 March 2022, Bucharest.

²⁷ Interview with Carmen Gheorghe, Director of E-Romnja Association; Interview with Daniela Tarnovski; Interview with Simona Toroțcoi, UNICEF; Interview with Marian Daragiu, State Subsecretary - Ministry of Education; Interview with Mihai Neacșu, Director of the National Centre for Roma Culture.

88% in children who do not belong to the Roma minority.²⁸ Regarding the educational performance of Roma students, the FRA states that 35% of young Roma are illiterate and 34% of people aged between 25 and 44 years old cannot read or write.²⁹ Roma girls face significantly higher risks of dropping out or leaving school early, compared to boys. This is also reflected in the illiteracy rate, which is significantly higher among Roma women than among Roma men.

According to the latest data (2022) on the segregation of Roma students,³⁰ 66% of schools with Roma population are segregated by class on the basis of ethnicity and 27% by buildings. Moreover, the partial approach of some segregation effects, and failure to address the causes of segregation, from the perspective of preventing and combating this phenomenon, will lead to the persistence or even worsening of the phenomenon. Data from 2022 shows that the lack of concrete actions to address the phenomenon has contributed to the increase in class segregation from 26% in 2015 (European Commission and CADO) to 66% in 2022, which means that the number of Roma students subjected to segregation has tripled in terms of access to quality education.

Romania has failed in its commitment to meet the objectives of the EU Strategy in the field of education and vocational training by 2020, to reduce the early school leaving rate to 11.3% within the 2010 - 2020 period. According to Eurostat, in 2020, Romania reached a maximum threshold of 15.6% in early school leaving, which is the highest rate among the Member States.³¹ In the field of education, NRSF proposes the following main directions of action:

- Reducing school dropout among Roma students;
- Increasing the inclusion of Roma children in the formal education system;
- Ensuring the quality of education in preschools and schools with predominantly Roma students, with an emphasis on residential segregated schools and schools in isolated communities;
- Promoting interculturality and creating an inclusive school environment;
- Preserving Roma students' cultural identity and building their self-esteem.

The main obstacles in the field of education are largely identified in the NRSF, but it fails to explain in detail their causes, factors, and effects.³² In fact, the NRSF skips the stage of analysing the main issues and goes directly to identifying the main measures: increasing the quality of education, improving the socio-economic situation of the household that prevents school participation (food, clothing, living conditions) and school mediation.

Regarding illiteracy, the NRSF mentions this issue only regarding the group of children who have left school and will become beneficiaries of the 'Second Chance' Programme³³,

²⁸ EU-MIDIS II. (2016). *Al Doilea Sondaj privind Minoritățile și Discriminarea în Uniunea Europeană. Romii – Rezultate Selectate*. Luxembourg: Agenția Uniunii Europene pentru Drepturi Fundamentale ('The Second Survey on Minorities and Discrimination in the European Union. Roma - Selected Results'). Luxembourg: European Union Agency for Fundamental Rights), Eurostat 2021. Available at: https://ec.europa.eu/eurostat/databrowser/view/sdg_04_10/default/table?lang=en

²⁹ *Ibidem*.

³⁰ Centre for Advocacy and Human Rights (CADO), *Raport privind Segregarea în Educație și Monitorizare acesteia* ('Report on Segregation in Education and Monitoring of the Phenomenon'), May 2022, unpublished, to be made available at: www.cado.org.ro

³¹ *Ibidem*.

³² Online interview with Claudiu Ivan, Public Policy Expert, 18 March 2022, Bucharest.

³³ The 'Second Chance' Programme is addressed to teenagers, young people, adults, coming from diverse social backgrounds and of varying ages, who have not attended or completed primary and secondary education. For more information see: https://www.edu.ro/a_doua_sansa

without focusing on the group of Roma students who have a first chance at education. The measures proposed by the NRSF lead to at least maintaining the problem or even aggravating it instead of solving it,³⁴ whereas measures for preventing and combating illiteracy should be addressed to both groups of beneficiaries.

Another concern is the superficiality with which decentralised institutions in the field of education deal with this issue, while the NRSF solution is to strengthen the status of the School Inspector for Roma education within the County School Inspectorates.

School segregation is mentioned in the NRSF as the main obstacle to quality education, but without explaining the extent of this phenomenon. Although there is data collected by EU institutions or the civil society at the national level indicating that in Romania segregation in education still persists, some would even argue it is rampant, despite the ME regulations mentioned by the NRSF both for prevention and combating, or the main factors that contribute to this status quo. The NRSF does not define segregation as ethnic discrimination, but only as a persisting phenomenon.³⁵ In fact, none of the measures proposed in the action plan on education is targeting specifically the school segregation.³⁶

Although NRSF mentions the interplay and vicious circle between factors affecting Roma students' education, the needs analysis and problem definition do not clearly reflect the link between the factors, nor the integrated approach to the problems, even if this is mentioned. Compared to the previous strategy, analysing the needs of Roma children in education is more superficial, limiting, and selective, giving the impression "that this strategy was intended to be a vision that provides a general framework"³⁷ rather than a concrete and real approach to these issues.

The main measures proposed to reduce school dropout are: remedial education programmes, participation of Roma students excluded from programmes of national interest in support programmes, training and employment of school mediators in schools with at least 15% Roma, impact evaluation of the school mediation, the creation and employment in each county of one School Inspector for Roma students, a monitoring system for the prevention of school dropout or other types of school exclusion. The plan does not include (similar to other areas such as employment and housing) measures to improve the socio-economic situation of the household that hinders school participation (food, clothing, living conditions). The lack of quantitative indicators in these areas and for measuring the specific geographical area of implementation makes it impossible to identify whether the beneficiaries of such measures will come from families who will benefit from solutions targeting access to employment and entrepreneurship or housing. The lack of such data affects the integrated approach that NRSF wants.

Regarding the increase in Roma children's inclusion in the formal education system, the proposed measures are: establishment of nurseries, kindergartens with normal or extended programme, summer kindergartens, bilingual kindergartens, multifunctional day centres in communities with Roma population; continuing affirmative action for Roma students in lower and upper secondary school and in universities; increasing Roma parents' participation in the educational process inside and outside the school, and

³⁴ Online interview with Claudiu Ivan, Public Policy Expert, 18 March 18, 2022, Bucharest.

³⁵ Online interview with Daniela Tarnovski, Expert - Sociologist, 28 March 2022, Bucharest.

³⁶ See NRSF, Annex 2 — Plan of Measures under Specific Objective 2 — Ensuring Access for Romanian Roma Citizens to Quality Inclusive Education.

³⁷ Online interview with Claudiu Ivan, Public Policy Expert, 18 April 2022, Bucharest.

encouraging young Roma participation in the vocational and dual vocational education system.

If these measures are going to be implemented, they will support the 'European Child Guarantee'³⁸ initiative, aiming at preventing and combating social exclusion by guaranteeing the access of children in need to a set of key services: early childhood education and care, education (including school-based activities), healthcare, nutrition, and housing. Ensuring the quality of education in schools (preschool and school) with predominantly Roma students, with a focus on residentially segregated schools and schools in isolated communities will be done by ensuring appropriate school infrastructure and providing incentives for teachers working in schools in marginalised communities.

This direction of action bears several problems, namely: education quality is interpreted in a limiting way, only from the perspective of improving school infrastructure and incentives for teachers. The NRSF omits a number of more relevant measures, such as teacher training for improving teaching and interaction with students, the school-student-parent relationship, monitoring and evaluating teacher performance, developing and implementing an incentive system for staff to achieve educational performance or prevent residential segregation. Such an approach can be considered limiting and superficial and will not lead to a concrete and sustainable improvement of the quality of education. However, provided that in-service teacher training programmes and other mainstream measures are in place, this limitation can be corrected. Also, the corresponding measures refer only to a small group of Roma students from residentially segregated schools or from residential communities, eliminating Roma students segregated by class or in need of better-quality education provided by qualified staff.

Moreover, the strategy's failure to address racial discrimination in education is a fundamental obstacle in protecting Roma children against various forms of discrimination (segregation, ethnic bullying, etc.), in empowering institutions with a role in preventing and combating it and raising awareness among Roma and non-Roma parents about their role in preventing this phenomenon.³⁹

The promotion of interculturality and the creation of an inclusive school environment will be ensured through measures concerning regular training of teachers on combating discrimination and intercultural education; introducing human rights protection in school curricula; methods to combat discrimination/segregation and supporting multicultural education; extracurricular activities on understanding ethnic diversity and interculturality. All these measures are addressed to students and teachers, but not to parents who must play an active role in promoting interculturality and non-discrimination.

In general, in terms of the relevance of the measures, some of them meet the identified needs. However, the dilemma is how effective and impactful they will be, due to non-quantifiable indicators, lack of benchmarks and amounts allocated to implement these measures⁴⁰ making it considerably more difficult to measure the level of achievement of the proposed indicators. Moreover, it is not clear how the school performance of Roma

³⁸ The European Child Guarantee is asking member states to submit to the Commission, within nine months from the adoption of this Recommendation, an action plan, covering the period until 2030. For more information, see: <https://ec.europa.eu/social/main.jsp?catId=1428&langId=en>

³⁹ Online interview with Daniela Tarnovschi, FRA and WB Consultant, Public Policy Expert, 28 March 2022, Bucharest.

⁴⁰ Telephone interview with Marian Daragiu, State Subsecretary - Ministry of Education, 30 March 2022, Bucharest.

students will be monitored, the collection of disaggregated data being somehow avoided in the text and in the action plan.

2.3. Employment

Data on Roma employment is deficient in the absence of a consistent public mechanism for data collection, the primary source of information being the research conducted by the civil society. Roma people's access to the labour market remains low. Lack of education, poor qualification, limited opportunities and discrimination in the labour market, lower digital skills, these all lead to a Roma employment rate well below that of the general population. In 2016, according to the FRA report,⁴¹ the share of Roma in Romania who declared paid work as their main activity was merely 28%, compared to 66% among the majority population. For Roma women, employment is even more difficult, with only 13% of them being employed in 2016, compared to 42% of Roma men.

In Romania, almost 39% of Roma people have experienced discrimination in their search for a job because of their ethnicity, and 10% have experienced discrimination in the workplace, according to the report 'Poverty and Employment: the Situation of Roma in 11 EU Member States' carried out by the FRA.⁴² The precariousness of jobs occupied by Roma ethnics is also highlighted by the proportion of those who work without an employment contract, (almost 40% for Roma, only 5% for the majority population), thus enhancing the vulnerability of Roma by excluding them from the insurance system, leading to difficult access to public services, and at the same time increases the risk of abuse by the employer.⁴³

Nonetheless, the phenomenon of discrimination in the labour market is under-reported to state authorities, according to the NCCD's activity report. In 2020, only four petitions were sent to the NCCD concerning ethnic discrimination in access to employment, and in 2021 only two cases.⁴⁴ Low trust in state institutions and ignorance of rights and ways to act in discrimination cases of discrimination led to a state of affairs in which discrimination against Roma and other ethnic minorities within the labour market remains underreported and unpunished. The NRSF emphasizes the weak insertion of Roma in the Romanian labour market compared to the general population. It highlights the differences in income sources between Roma and non-Roma households and emphasizes the specific challenges of Roma women and young Roma, especially young Roma from rural areas. The strategy emphasises the "significantly lower chances" of young Roma in rural areas and of Roma women to be included in the formal economy.

⁴¹ Fundamental Rights Agency, *Second Survey on Minorities and Discrimination in the European Union Roma - Selected Results*, Luxembourg: Publications Office of the European Union, 2016, p. 21. See: https://fra.europa.eu/sites/default/files/fra_uploads/fra-2016-eu-minorities-survey-roma-selected-findings_ro.pdf

⁴² Fundamental Rights Agency, *Poverty and Employment: The situation of the Roma in 11 EU Member States, Roma survey – Data in focus*, Luxembourg: Publications Office of the European Union, 2016, p. 30.

⁴³ IRES, *Studiu Comparativ al Nevoilor Comunităților de Romi în Contextul Stabilirii Priorităților Strategice de Intervenție pentru Incluziunea Socială a Acestora, Raport de Cercetare 2019* (Comparative Study of the Needs of Roma Communities in the Context of Establishing Strategic Intervention Priorities for Their Social Inclusion, Research Report 2019). Available at: <https://www.agentiainpreuna.ro/wp-content/uploads/2021/11/Studiu-comparativ-al-nevoilor-comunitatilor-de-romi-in-contextul-stabilirii-prioritatilor-strategice-de-interventie-pentru-incluziunea-sociala-a-acestora.pdf>

⁴⁴ National Council for Combating Discrimination), *Raport de activitate 2021* (2021 Activity Report), p. 10. See: <https://www.NCCD.ro/wp-content/uploads/2022/04/Raport-de-activitate-NCCD-2021-.pdf>
<https://www.NCCD.ro/wp-content/uploads/2021/04/Raport-de-activitate-NCCD-2020.pdf>

The NRSF also outlines the effects of the Roma people's lack of skills and opportunities to enter the labour market, causing people to look for low-paid jobs, which cannot cover the cost of living, thus impacting children's school attendance and family health. Although not directly mentioned as an employment challenge, the NRSF points out that combating anti-Roma attitudes in existing legislation is currently insufficient, and that all key areas of the NRSF "must be accompanied by relevant measures to address and make explicit reference to anti-Roma attitudes".⁴⁵ The exclusion of Roma from the labour market is "an economic cost for society, through the waste of precious human capital and loss of labour productivity".⁴⁶ Therefore, Roma participation in the labour market "is essential to support the rising national costs, especially those related to pensions and health".⁴⁷ However, it is also an opportunity for Romania "to capitalise on the social and economic potential in the long term".⁴⁸

To improve the employment situation among the Roma in Romania, the NRSF proposes three distinct directions of action:

1. Development and valorisation of the human capital that comes from the Roma communities through programmes consistently adapted and targeting the profile of the communities, considering socio-cultural and regional specificities.
2. Enhancing human capital, with a focus on Roma youth and women in rural areas, by establishing multifunctional centres and improving methods of interinstitutional intervention especially in rural communities.
3. Stimulating the integration of Roma people into the labour market through National Entrepreneurship and Social Economy Programmes.

For the first direction, the NRSF proposes the following measures: create a flexible framework for obtaining a qualification; increase the number of anti-discrimination campaigns among employers; promote the financial benefits related to the status of insertion enterprises. The NRSF also mentions actions to initiate, promote and invigorate information campaigns on national employment programmes, while also involving active Roma human resources at the local level.

For the second direction, the NRSF aims to initiate, promote, and implement an integrated package of personalised services for people outside the labour market. Among these services, it mentions information and professional counselling, work mediation, as well as activities that inform and promote the interests of young people at risk of social marginalisation among employers, service provision by integrated multidisciplinary community teams. In this case, such teams would provide active employment or educational measures to improve qualifications. Improving apprenticeship legislation and facilitating access to apprenticeship programmes within the national programmes implemented by the NAE, especially for young people from rural areas, is also mentioned.

The third direction recommends the initiation, development and implementation of social economy and entrepreneurship programmes in marginalised communities to create jobs and increase interest for sustainable activities in marginalised areas. The NRSF identifies the structures responsible for the implementation of every proposed action/measure for

⁴⁵ NRSF, 3.7 Combating Discrimination and Anti-Roma Attitudes, 3.7.1 Existing Situation.

⁴⁶ NRSF, 3. Existing Policies and Applicable Legal Framework. Description of the Current Situation, 3.4 Employment.

⁴⁷ *Ibidem*.

⁴⁸ NRSF, 4. Defining the Problems, 4.1.4 Employment.

each of the three directions of action (MMPS, NAE, NCCD, ME), and, although some of the actions propose a deadline, most are 'permanent activities', without clear indicators.

For example, the results that the Strategy hopes to achieve in the field of employment include "reducing ethnic discrimination in the labour market at employment", "increasing employment among Roma people" or "creating jobs in marginalised areas". Regarding the budget allocated to each action, the Strategy states only that it is "according to the budgetary resources (budget) approved for the responsible institutions". As well as "the achievement of the objectives will be ensured by an efficient and sufficient allocation of resources through the use of funds from the state budget, the local budgets, and additionally, in an itemised manner, from EU financial instruments or other sources of funding".⁴⁹

2.4. Healthcare

Studies and reports analysing Roma health unanimously state that the health status of Roma is gradually deteriorating, and that Roma continue to encounter problems when accessing public health services. Recent data shows that there is still a gap between the morbidity and mortality indicators among Roma and those of the majority population in Romania.

The NRSF is presenting the main health data of the IRES report,⁵⁰ stating that there are visible differences between the Roma and the majority population in terms of health status and access to health services:

1. Lack of annual medical examination - 39% of Roma and 71% of the majority population carry out their annual health check.
2. Enrolment with the family doctor - compared to 2012, there is an increase in the number of persons enrolled with the family doctor in 2018 for both Roma and the majority population.
3. Most common diseases - dental, cardiovascular, digestive, and ophthalmic diseases, with no major difference between Roma and the majority population.
4. Access to health services among Roma - the number of Roma claiming to not have received specialist hospital care has decreased from 21% in 2012 to 12% in 2018.
5. Large differences in the use of contraception – at least 10% between the majority population and Roma; 16% of Roma women prefer to have an abortion, while for the majority it is 1%, with minor changes since 2012.
6. Medical surveillance during pregnancy - lower than in the majority population, 18% of Roma women say they have never visited a doctor during their pregnancy.

The NRSF is also quoting a UNICEF report⁵¹ stating that in 2015, the proportion of Roma children aged between one and five years old who were not vaccinated was three times

⁴⁹ NRSF, Employment Action Plan, SO 3 - Increasing the Employment Rate of Roma in Accordance with Market Requirements for Their Professional Development.

⁵⁰ IRES (2018). *Studiu Comparativ a Nevoilor Comunităților de Romi în Contextul Stabilirii Priorităților Strategice de Intervenție pentru Incluziunea Socială a Acestoră* (Comparative Study of the Needs of Roma Communities in the Context of Setting Strategic Intervention Priorities for Their Social Inclusion). Cluj-Napoca: IRES.

higher than that of the majority of unvaccinated children, and the situation has not improved significantly.

According to the NRSF, the biggest health challenges affecting the Roma in Romania are still the lack of annual medical check-ups, the lack of medical insurance, and non-registration with family doctors, limited access to emergency medical services, high frequency of diseases (cardiovascular, digestive, ophthalmic, dental diseases, various forms of cancer, respiratory diseases, etc.), problems related to pregnancy care for the mother and new-born care, including lack of medical care at birth, large differences in the use of contraception. But the most important issue that directly affects the Roma population and is explicitly mentioned in the document proposed by the NAR is the limited access to medical services due to the discrimination against the Roma.⁵²

The issue of discrimination against Roma in the healthcare system is a common topic mentioned by civil society representatives, more specifically the relationship between medical staff and patients that takes different forms, namely: direct discrimination (when Roma are refused directly by the medical staff, even if they meet all the conditions to receive medical care), indirect discrimination, segregation of patients in hospital units based on ethnicity and social status.⁵³ However, the topic is not attractive to government officials and discrimination against Roma is a cross-cutting issue in the new strategic vision that covers several areas of interest".⁵⁴

Regarding the challenges, the NRSF acknowledges the need to reduce the health gap between Roma and the rest of the population, based on the need to correlate disaggregated data by ethnicity and their inclusion in national public health programmes. Public health experts mention the need to implement programmes for vulnerable communities, especially Roma communities, to increase the addressability of members of these communities to national public health programmes and subprogrammes managed by both the Ministry of Health and the National Health Insurance Agency. These shall be based on a thorough knowledge of the size of the issue, and on the need to collect data in compliance with the legislation in the field of personal data protection.

Another challenge launched by the NRSF is the responsibility of the National Health Insurance Agency and the Ministry of Health to include in the national health programmes specific provisions regarding the Roma population in order for them to equally benefit from the national preventive and curative health programmes.

According to the MH representative, the most important aspect of the new strategic vision is the community health care programme, which, with the help of the community team, can contribute to addressing all the issues mentioned in the substantiation note. The community health care team is important for Roma communities and for this reason solutions must be identified for local authorities to hire health mediators and community nurses to provide services to community members.⁵⁵

⁵¹ ANPDCA, UNICEF Romania, 2017, *First Priority: No Invisible Children*. Available at: <https://www.unicef.org/romania/ro/rapoarte/evaluarea-sumativă-modelului-„prima-prioritate-niciun-copil-«invizibil>

⁵² NRSF, 3. Existing Policies and Applicable Legal Framework. Description of the Current Situation, 3.5 Health

⁵³ Information presented by several of the Roma civil society representatives.

⁵⁴ Online interview with Daniel Rădulescu, Ex-President of the National Agency for Roma, 16 March 2022, Bucharest.

⁵⁵ Online interview with Lidia Manuela Onofrei, Ministry of Health, National Coordinator of Community Health Care Activity, 29 March 2022, Bucharest.

Regarding the relevance of the proposed measures, opinions are divided. On the one hand, the representatives of the NAR and the MH consider that these measures are relevant to the needs described. On the other hand, the civil society representatives mention that these measures are not enough, the problems mentioned in the substantiation note⁵⁶ being much more profound and requiring a much more detailed approach.

An example that illustrates the differences of opinions between government apparatus experts and civil society experts is the topic of discrimination in accessing health care services. This topic is addressed in the substantiation note and includes measures stipulated in the action plan. Proposed measures include the development and implementation of training programmes for medical staff and the development of a monitoring system leading to improved quality standards provided by health care service providers at the community level. From the point of view of civil society experts, these measures can be accompanied by other much better-targeted measures, such as: a practice guide in the field of non-discrimination and developing working procedures for the Ethics Committees and the College of Physicians to support experts in the process of analysing and penalising discrimination.

2.5. Housing, essential services, and environmental justice

Ensuring access to adequate housing is a precondition for the exercise of many other fundamental rights, which must be granted to any individual. However, the situation is difficult, “the proportion of Roma families living in unsanitary households (with leaking roof water, with damp walls or rot in window frames or on the floor) is 32%, and the share of those who accuse pollution, dirt or other environmental problems is 25%. More than 50% live in overcrowded houses, 16.5% live in buildings considered unsafe for housing and 30.3% in buildings that are in a visible state of disrepair damage”.⁵⁷

Housing safety is at the heart of the issue, followed by housing quality and adequacy.⁵⁸ According to expert studies, problems related to the issues below are still signs of social exclusion faced by an important segment of the Roma population. These are as follows: condition of housing; eviction from social housing; demolition of houses built illegally on public or private land; lack of housing for young people or the condition of roads and lack of infrastructure at community level; and limited access to adequate housing.

The previous NRIS set the priority objective of ensuring decent living conditions in economically and socially disadvantaged communities by addressing issues related to the ownership of land and housing owned by Roma, the implementation of housing rehabilitation programmes in Roma-inhabited areas, provision of electricity, drinking water, sewerage, methane gas, sanitation, development of infrastructure in Roma communities, clarification of the situation of informal Roma settlements and development of integrated programmes for urban regeneration and eradication of unhealthy habitat. The interviewees’ opinion is unanimous: these goals were not achieved, and the issue of housing is still a major challenge that requires interinstitutional collaboration at both central and county/local levels.⁵⁹

⁵⁶ NRSF, Substantiation Note.

⁵⁷ NRSF, 3.1 Housing

⁵⁸ Online interview with Bogdan Suditu, Housing and Development Activist and Expert, 1 April 2022, Bucharest.

⁵⁹ See: <http://anr.gov.ro/index.php/anr/rapoarte>

The NAR's monitoring report⁶⁰ for 2018 highlights the fact that a significant share of members in communities with Roma live in inadequate (inhuman, degrading) living conditions: housing that barely provides shelter against the weather and overcrowded houses with poor or even miserable hygiene conditions. This category includes abandoned blocks of flats, without sanitary installations and equipment, without windows or doors, damaged walls, poorly resistant to weather, and spaces where we often find Roma residents.

The WGRH, set up by the NAR (2018), aimed, on the one hand, at identifying and applying effective solutions to implement the measures included in public policy documents in the field of Roma housing and, on the other hand, at developing effective working methodologies that would contribute to the preventing of the negative effects of the eviction.⁶¹

The NRSF acknowledges the need of the Roma communities for decent living conditions⁶² through access to transport and utilities infrastructure, issues dependent on the goodwill and/or interest of local public administration authorities, but very often also on the legal status of the settlements. The new NRSF vision is based on the need to include Roma communities in the national cadastral programme of the MDPWA. This measure is needed to clarify the legal status of access roads in communities, as well as the legal situation of the land, necessary for the inclusion of Roma communities in the Local Development Plans, for access to small infrastructure funds and access to public utilities.

At the same time, the NRSF mentions the need for accountability of county/local authorities, a level that has the exclusive legal competence to address the identified issues, to prioritize and solve them, which indicates that in documenting the new strategy, the NAR understood the new challenges in terms of housing and small infrastructure. The housing action plan⁶³ proposed by the NRSF contains concrete measures based on the real needs of Roma communities and mentions the need to complement the measures targeting the Roma population of other programmes and strategies in the field of housing.

The text circulated by the NAR in the public debate raised a series of reactions from MDPWA experts that contradict the principles of drafting a public policy document. For example, the proposal to implement a national social housing programme that would also benefit members of vulnerable Roma communities has created a great deal of debate among the MDPWA specialists, considering that a national programme for the construction of social housing for Roma is a discriminatory measure.⁶⁴

The right to housing is also constitutionally guaranteed by the Housing Law no. 114/1996, which stipulates that every citizen has the right to housing and that the construction of housing is a major objective related to the long-term national interest. In Romania, many local municipalities have adopted social housing policies that exclude applicants and/or their family members who occupy or have occupied property owned by

⁶⁰ National Agency for Roma, *Monitorizare Stadiu Implementare Măsuri Regăsite în Strategia Guvernului României de Incluziune a Cetățenilor Români Aparținând Minorității Rome pentru Perioada 2015-2020, respectiv HG 18/2015*. (Monitoring the Implementation Stage of Measures Found in the Romanian Government's Strategy for the Inclusion of Romanian Citizens Belonging to the Roma Minority for the Period 2015-2020, GD 18/2015). Available at: http://www.anr.gov.ro/docs/Site2018/Rapoarte/HG18-2015/1.%20Raport%20anual%202017%20monitorizare%20HG18_2015.pdf

⁶¹ *Ibidem*.

⁶² NRSF, 4.2.1.2 Infrastructure.

⁶³ NRSF, Action Plan for Housing and Infrastructure, Specific Objective 1. Improving the Housing Conditions of Members of Vulnerable Communities with Roma.

⁶⁴ *Ibidem*.

the Romanian state or local municipality. In addition to this exclusion, applicants who live in informal housing, have a lower level of education or are unmarried, get a lower score than applicants with official housing, higher education and who are married.⁶⁵ These eligibility criteria and scoring systems, developed and adopted by the Local Councils, do not provide equal access to social housing, especially for Roma who are frequently victims of forced evictions. Although seemingly neutral, it has a disproportionate effect on the Roma, which constitutes indirect discrimination against them in accessing social housing.

We can see major differences compared to previous strategies: the new NRSF project emphasizes the need for better and more timely documentation of housing issues, with a focus on identifying alternative housing solutions for Roma in risk areas and at risk of eviction. Also, the housing area is treated separately from the small infrastructure area which must be approached differently, with the involvement of all decision-makers from the central to the local level. It is also worth mentioning the initiative to create a map of areas at risk of evacuation as a useful tool for long-term development strategies, Roma inclusion plans and financing programmes for the housing component.⁶⁶

Romania is lagging behind both in terms of policies and rhetoric at the level of politicians and CSOs, particularly regarding environmental justice, and the NRSF does not include environmental issues as such. Still, the NRSF includes measures that promote the inclusion of marginalised Roma communities in national programmes to connect housing to utility networks (electricity, water, and sanitation), with particular attention being paid to ensuring access to drinking water.⁶⁷

2.6. Social protection

The absolute poverty rate calculated by the World Bank using data from 2013 was about 33.1% for the Roma population, compared to 3.4% for non-Roma,⁶⁸ while in 2011 the data showed that about 90% of Roma households faced severe material problems. While such a high percentage of Roma are affected by poverty, Romania's social protection system is not yet equipped to help them maintain a minimum standard of living. Also, poverty impedes access to even the most basic health, education, and social assistance services. The responsibility is placed on local authorities - many of which do not have the human resources, knowledge, or funding to adequately meet the very complex needs of Roma within their communities, especially in rural areas and small towns.

Roma people also face discrimination in the labour market, and the majority of the Roma living in rural areas face limited job opportunities, and consequently difficulties in earning a decent income. The usual sources of income for the unemployed Roma are daily or seasonal jobs in agriculture or construction, or informal self-employment, such as picking and selling berries and mushrooms, making brooms and baskets, etc., or jobs

⁶⁵ See: *Obligația de a Nu Discrimina. Ghid pentru Autorități Publice Locale în Vederea Elaborării de Criterii Nediscriminatorii de Atribuire și pentru Îndeplinirea Sarcinilor Acestora cu privire la Locuințe Sociale* (The Obligation to not Discriminate. Guide for Local Public Authorities to Develop Nondiscriminatory Award Criteria and to Carry Out Their Tasks Regarding Social Housing), developed by the Resource Center for Roma Communities (2021). Available at: <https://romacenter.ro/wp-content/uploads/2021/02/01-GHID-OBLIGATIA-DE-A-NU-DISCRIMINA-PRIN-POLITICILE-LOCATIVE.pdf>

⁶⁶ NRSF, Action Plan for Housing and Infrastructure, Specific Objective 1 - Improving the Housing Conditions of Members of Vulnerable Communities with Roma.

⁶⁷ *Ibidem*.

⁶⁸ World Bank, (coord. Emil Teșliuc, Vlad Grigoraș, Manuela Stănculescu), *Studiu de Fundamentare pentru Strategia națională privind Incluziunea Socială și Reducerea Sărăciei 2015-2020* (Foundation Study for the National Strategy on Social Inclusion and Poverty Reduction 2015-2020), p. 39. Available at: http://www.mmuncii.ro/j33/images/Documente/Familie/2016/SF_BancaMondiala_RO_web.pdf

on the black market, especially in areas such as construction work. In 2016, four out of ten Roma people lived in a low work-intensity household, and 64% of young Roma were in the NEET category, a much larger share as compared to the national average. Migration to find sources of income abroad is 29% for Roma, compared to 18% for the majority population; 10% of Roma families include children whose parent/parents are abroad, compared to 4% for the majority population. About 60% of all rural Roma communities are poor, compared to urban Roma communities that have a slightly more educated, albeit still low-skilled workforce.⁶⁹

Regarding the minimum guaranteed income, it is estimated that 25% of Roma families are beneficiaries of the system, with a higher proportion in rural areas.⁷⁰ The minimum guaranteed income is around 32 EUR per month for one person, while for a family of five people it reaches around 120 EUR. As mentioned by the Roma leaders who were interviewed, despite their limited chances, Roma have the same aspirations as non-Roma, for themselves and their children. However, when comparing the benefits of mandatory education for example to everyday family survival, conflicting priorities will lead many young Roma to sacrifice school for work and ensure the survival of the family members. Adequate access to resources and information may prevent this situation.

Despite their reduced access to quality health services, education and earning opportunities, Roma parents want their children to pursue the highest level of education: approximately 73% of Roma parents want their children to at least graduate middle school and high school education, compared to 92% of non-Roma parents living nearby. In terms of jobs, employed Roma say they are much happier and content with their living conditions than those without a job, while 74% of Roma men and 76% of Roma women say they prefer “a stable but less well-paid job” to one that provided “higher income, but less certainty and stability”.⁷¹

Access to ‘safety net’ assistance programmes is quite widespread among Roma households, though they remain significantly below the poverty line. Nine out of ten Roma households have access to at least one social protection programme in Romania, but three out of five Roma households have the lowest income distribution.⁷² Although ‘safety net’ assistance programmes are for the poorest, fragmentation and poor development of current social assistance programmes, including their formula, tend to reduce generosity for larger households, reducing their effectiveness in combating poverty among Roma households.

High levels of unemployment and job instability not only limit income and maintain adult poverty, but also affect children, leading to absenteeism and early school leaving, malnutrition and chronic diseases. Moreover, they perpetuate the low chances Roma face on the labour market. Due to the low and unstable income from work, many Roma families end up relying only on child allowances and informal or low-income sources.

⁶⁹ World Bank, (coord. Emil Teșliuc, Vlad Grigoraș, Manuela Stănculescu), *Studiu de Fundamentare pentru Strategia Națională privind Incluziunea Socială și Reducerea Sărăciei 2015-2020* (Foundation Study for the National Strategy on Social Inclusion and Poverty Reduction 2015-2020), p. 39. Available at: http://www.mmuncii.ro/j33/images/Documente/Familie/2016/SF_BancaMondiala_RO_web.pdf

⁷⁰ SocioRoMap. Ancheta experților locali privind comunitățile și grupările compacte de romi din România, p. 8. Available at: <https://ispmn.gov.ro/uploads/04%20SocioRoMap%20brosura%20Ancheta%20%20%20%20expertilor%20-%2009.pdf>

⁷¹ World Bank, (coord. Emil Teșliuc, Vlad Grigoraș, Manuela Stănculescu,), *Ce Este Necesară pentru Realizarea Incluziunii Romilor din România?* (What is Needed for the Inclusion of Roma in Romania?), 2014, p. 11. Available at: <https://www.worldbank.org/content/dam/Worldbank/document/eca/romania/Summary%20Report%20Romani anAchievingRoma%20Inclusion%20RO.pdf>

⁷² *Ibidem*.

Moreover, the 'safety net' system discourages beneficiaries who no longer feel motivated to look for work, as they receive certain significant tax exemptions and social benefits, especially those who earn the minimum wage or work part-time. Unemployment benefits, which are not very generous, are often discontinued abruptly when people start working legally, and these inadequate components of the welfare system set a trap for inactivity in low-income families, most of whom are Roma.⁷³

There is no rigorous systematic evidence to inform social inclusion policies targeting the Roma population on what works, what does not work and why, although the European civil society has long advocated for the development of evidence-based public policies that support social inclusion. Stakeholders (state agencies, town halls, civil society organizations, funders, etc.) in Eastern Europe usually do not have or have very little information on whether the policy-making efforts in question have had an impact on the lives of Roma communities. As a result, information on the reasons why the impact on inclusion is so precarious, is still unavailable, and this needs to be obtained through a rigorous evaluation of the initiatives.

The NRSF does not directly address the issue of social protection. However, it indirectly addresses the issue of employment and vocational training, lack of qualification and opportunities for insertion into the labour market. This leads to the impossibility of covering the costs for utilities and maintenance of housing, and the inability to provide for daily living (food, clothing), thus impacting children's school participation and the family's health.

Regarding measures, the NRSF mentions, among others, "Increasing Roma employment rate in accordance with the market requirements for their professional evolution". Some measures also target the development and valorisation of human capital available within the Roma communities. The NRSP goes on to add the need for amending the legislative framework to provide tax incentives or subsidies to businesses with sustainable activities in marginalised areas, especially in rural areas where young Roma and women live, as well as in areas with informal settlements.

2.7. Social services

In general, social services address certain problems and life situations that require professional social intervention. The Romanian system developed social services for vulnerable groups, without taking ethnicity as a criterion into consideration. Therefore, Roma are often not explicitly included in social inclusion mainstream programmes, focusing in return on certain types of disadvantages/vulnerabilities. Moreover, for several social services, the system is subcontracting the service delivery to CSOs and other for-profit structures, based on the accreditation of services and standards of costs (for example, for children with health or disability problems, the elderly, adults with disabilities, etc.). The NRSF does not address social services as a priority, leaving the mainstream social services to cover the issue.

On the other hand, there is a severe shortage of Roma community mediators who can implement multiple interventions. They help Roma access more social services, acting as a bridge between Roma communities, public representatives, and non-Roma communities. They also compensate for the lack of communication and fostering mutual awareness and understanding. Roma people need better quality and coverage of social services (medical care, waste collection, neighbourhood law enforcement, youth activities, mentoring, counselling, recreational activities). Another serious and common problem is violence against women. According to the Network for the Prevention and

⁷³ *Ibidem*, p. 18.

Combating of Violence against Women, in Romania, 426 women and girls have been killed by a family member in the last eight years. Thousands of other girls and women have suffered physical, mental, or sexual trauma. The Romanian state has a constitutional obligation to guarantee all women and girls, without any discrimination, the right to a safe life. Every case of domestic and gender-based violence shows the failure of the state to guarantee fundamental rights.

The system for the electronic monitoring of aggressors started its operation in March 2022 and will be piloted for the next three years only in Bucharest. All this time, far too many women and girls will lose their lives, even if there is a protection order issued for them against their aggressors. The Roma family is a place of belonging, self-preservation, and protection. At the same time, the family can be and is indeed a place where there is a strong social control that limits women's freedom and autonomy, which increases the risk of violence against them. We cannot discuss the inclusion of a vulnerable group such as the Roma community unless we provide support and act for all members of the community, regardless of whether they are children, women, men, etc.

The strategy addresses the issue of social housing, and the limited access of Roma to social services. It also provides alarming data on the standard of living of most of those identified as Roma in all possible aspects as follows: standard of living; civilization; level of education; access to social and health services; etc. However, there is no chapter exclusively on social services, with measures related to it. Instead, rather general measures are included in the areas related to health, employment, and housing.

Community studies show that there are cumulative and mutually reinforcing links between residential segregation and reduced access to employment and social services. It is alarming given that 56% of Roma families live in segregated communities.⁷⁴ Marginalised areas tend to have poor access to quality infrastructure, education, social and health services, primarily as a result of administrative negligence. However, in marginal areas, it is mandatory to ensure access to basic services at the local level. The most important of which are medical dispensaries, nurseries, and access points to social services. The location of schools is a hotly debated topic, as the location of a school in an ethnically marginalised area leads to segregated schooling.

The NRSF sets out some of the Roma women's problems, such as insufficient education, lack of access to health care, especially for pregnant women, and low participation in the labour market. However, the gender perspective in the NRSF on Roma women is indeed problematic, Roma women being mentioned only in measures related to education, health, and employment.

2.8. Child protection

There is no official data on the number of Roma children receiving protection services, a denial in the fact that the state institutions do not collect ethnic disaggregated data. Some data provided by civil society state that in the institutional protection system, Roma children are overrepresented. An ERRC report shows that "in the counties surveyed where Roma constitute less than 15% of the total population, it was estimated that nearly 60% of children taken into state care in the counties are Roma (or 'half-Roma')".⁷⁵ UNICEF found in 2005 that more than 60% of children abandoned in medical

⁷⁴ World Bank (coord. Emil Teșliuc, Vlad Grigoraș, Manuela Stănculescu,), *Ce Este Necesară pentru Realizarea Incluziunii Romilor din România?* (What is Needed for the Inclusion of Roma in Romania?), 2014. Available at:

<https://www.worldbank.org/content/dam/Worldbank/document/eca/romania/Summary%20Report%20RomanianAchievingRoma%20Inclusion%20ORO.pdf>

⁷⁵ ERRC. (2021). *Blighted Lives: Romani Children in State Care*. European Roma Rights Centre ERRC, p. 63. Available at: <http://www.errc.org/reports--submissions/blighted-lives-romani-children-in-state-care>

institutions were of Roma origin.⁷⁶ The ERRC in 2011 stated that according to specialists in protection systems, 28% of children living in foster care were Roma, and, regarding children in placement centres, it was indicated that 40% of them were Roma.⁷⁷

The causes of Roma children entering the protection system are multiple and interrelated, involving both socio-economic factors and racial discrimination. According to a study by the ERRC, 50% of Roma children are institutionalised due to poverty, lack of jobs, inadequate living conditions and health care, or household structure, child abandonment in maternity wards and parental migration. Maintaining the high number of Roma children in the protection system has multiple causes. From the authorities' perspective, the main causes are related to the non-fulfilment of the standards by the biological families imposed by law to reunite the family. However, those standards are very high and unrealistic. Roma children are often victims of physical abuse within the institutional system and are victims of multiple/intersectional discrimination (education, employment, and health care). These are both on account of their ethnicity and their status as institutionalised children. Also, most institutionalised Roma children show a denial of ethnic identity due to a lack of awareness, denying or also rejecting their biological families.

In addition, several reports and studies identify Roma children as victims of various forms of violence, including sexual violence, such as early marriage, child trafficking or other violence. The US State Department's 2021 report on trafficking states that the phenomenon of exploitation of Roma children for sex trafficking and begging remains underreported by the authorities. Regarding early marriage, the 'National Strategy for the Protection and Promotion of the Rights of the Child 2014-2020' states that approximately 28% of Roma children/young people aged between 15 and 19-year-old are married. However, the strategy does not provide concrete measures or strategic actions that address the issue of early marriages.⁷⁸

The issue of violence against Roma children was also identified at the EU level. The European Parliament highlighted the high vulnerability of Roma communities to all forms of trafficking and exploitation, especially women and children. The European Parliament also called on the Commission and the Member States to develop specific measures to combat trafficking, as well as to collect statistics on victims of human trafficking based on their ethnic origin.⁷⁹

In the EU Strategic Framework, the Commission calls on MSs to include in their national strategic framework measures to "protect women, children and young people through strategies to combat crime, such as human trafficking, including all forms of exploitation, as relevant (sexual exploitation, labour exploitation, forced begging and the exploitation of criminal activities for simulated forced and exploitative marriages) and allow them access to assistance, support, and protection."

Unfortunately, the NRSF does not identify any issues to be addressed in the field of child protection, nor does it provide for field-specific measures, in the context of child

⁷⁶ UNICEF, *The Situation of Child Abandonment in Romania* (Bucharest, March 2005), p. 77.

⁷⁷ European Roma Rights Centre, *Condamnați pe Viață* (Condemned for Life), Budapest, 2011. Available at: http://www.errc.org/uploads/upload_en/file/condamnati-pe-viata-20-june-2011.pdf

⁷⁸ *National Strategy for the Protection and Promotion of the Rights of the Child 2014-2020*, p. 25.

⁷⁹ European Parliament, Committee on Civil Liberties, Justice and Home Affairs, Committee on Women's Rights and Gender Equality, *Report on the Implementation of Directive 2011/36 / EU on Preventing and Combating Trafficking in Human Beings and Protecting Its Victims*, 1.2.2021. Available at: https://www.europarl.europa.eu/doceo/document/A-9-2021-0011_RO.html

protection rules, social benefits, administrative structures and consistent mainstream programmes.

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

One of the most important components indicated by the interviewees was related to the Roma people's knowledge of their culture, history, and traditions. Beyond revising and improving school curricula and including historical data on Roma, another important aspect is the lack of cultural, historical, and artistic landmarks. Such as the Roma State Theatre, the Museum of Roma History and Culture or the National Institute for Research and Conservation of Roma Culture and history.

This cultural representation of the Roma institutions will require a broad interinstitutional mechanism of collaboration, but also a homogeneous and unitary position of Roma CSOs vis-a-vis these institutions.⁸⁰ Several representatives of the Roma civil society expressed that state policies' approach to Roma communities was based rather on vulnerability, with Roma being considered a social group.

In addition, the lack of concrete measures to promote Roma culture has further cemented the formation of a collective mindset based on stereotypes and prejudices leading to social distancing, discrimination, and racism. This is just one step away from institutional racism as long as most civil servants, decision-makers, and experts have a mentality impaired by prejudices and stereotypes.

We find in the NRSF specific measures to promote the Romani language or to recognise the importance of acknowledging the diversity of Roma communities. All these aspects are included and explained in the Strategy. In addition, a presentation of the problem from the perspective of the civil society can be noted.⁸¹

Within the NRSF, a specific objective is "Supporting research, conservation and promotion of Roma cultural heritage and cultural identity".⁸² On one hand, the action plan includes the necessary measures through which Roma people can manifest themselves as a minority:

- establishment of the Museum of Roma History and Culture (MICR);
- establishment of the Roma State Theatre;
- establishment of the National Institute for Research and Conservation of Roma Culture and History;
- promote the Romani language and traditional Roma crafts, but also measures to promote editorial production and modern cultural productions with a Roma theme, etc.

Such measures are long asked for by the Roma leaders and research community. However, it will need budgetary allocations and in the current context, such measures may not be considered priorities on the public agenda while the political influence of the Roma is weak. On the other hand, there are also measures aimed at reconciling with and recognising Roma slavery, Holocaust, and assimilation, as well as to review the curricula to teach elements specific to historical trauma with negative consequences for the Roma,

⁸⁰ Interview with Mihai Neacșu, Director of the National Centre for Roma Culture, 25 March 2022, Bucharest.

⁸¹ NRSF, 4.1.6.1 Identity, Traditions, and Cultural Heritage of the Roma Minority

⁸² NRSF, 5. Objectives of the Strategy

to establish study/research fellowship programmes for Roma researchers, and to promote Roma history through the siting of the Roma Slavery Monument.⁸³

⁸³ NRSF, Annex 5 – Support for Research, Conservation and Promotion of Roma Cultural Heritage and Cultural Identity

3. EXPECTED EFFECTIVENESS

3.1. Coherence with related domestic and European policies

The NRSF refers to several national and European programmatic documents and strategies. It states that “it is an intersectoral strategy that links the main documents resulting from the European 2020 Semester, namely the Annual Sustainable Development Strategy, the Country Report and the Country Specific Recommendations”.⁸⁴ It also adds that the Strategy “takes into account the results achieved by implementing” other national strategies (social inclusion and poverty reduction, employment, vocational training, early school leaving, lifelong learning, protection and promotion of the rights of the child).

The NRSF reference to other national strategies and programmes⁸⁵ is rather a matter of discourse. The need to integrate the NRSF with other existing sectoral strategies is acknowledged, but without providing a holistic and concrete approach to other national strategies and programmes, it remains at the level of vision. The other strategies mentioned need to be updated as well, being applicable between 2014 and 2020. The NRSF, through the Romanian Government, “assumes the establishment of specific indicators” for Roma to be introduced in existing sectoral strategies, and in already funded National Programmes”.⁸⁶ The strategies’ correlating approach remains a problem for the Romanian central public structures. The role and functionality of the ICIMES are being questioned⁸⁷ even by the high-level officials, each ministry being focussed on its area, without having the big picture.⁸⁸

3.2. Responsibility for NRSF coordination and monitoring

The roles and responsibilities of the ICIMES, the NAR and the NCPR should be clearly stated, and resources allocated accordingly. The NCPR (three permanent and two contracted staff) operates within the MIEP, under the Social Cohesion Programmes and Policies Evaluation Service. They act as a support structure for methodological guidance and support to the Managing Authority for the HCOP. The NCPR⁸⁹ participates in monitoring the implementation of the measures planned in the NRSF. They also coordinate the updating of objectives, formulate proposals for revision by the NRSF, as well as report to the European Commission, promoting the integration of Roma issues into all FESI-funded programmes. Additionally, they are responsible for disseminating examples of good practices in this area so that innovative approaches related to the implementation of the NRSF can be developed.

However formally, the NCPR is a lower profile structure compared to the NAR, without real power, and viewed with a high degree of scepticism by representatives of civil society organisations. Such scepticism derives from the composition of the NCPR team that is not known, neither whether the experts are of Roma ethnicity, nor the NCPR’s concrete role.⁹⁰ NAR representatives emphasised that the NCPR may be an important

⁸⁴ NRSF, 2. Principles and Vision

⁸⁵ NRSF, 2. Principles and Vision

⁸⁶ NRSF, 2. Principles and Vision

⁸⁷ Online interview with Lidia Manuela Onofrei, Ministry of Health, National Coordinator of Community Health Care Activity, 29 March 2022 Bucharest.

⁸⁸ Telephone interview with Marian Daragiu, Sub-Secretary of State, Ministry of Education, 30 March 2022, Bucharest.

⁸⁹ See: <https://pncr.fonduri-ue.ro/home-7/>

⁹⁰ See: <https://pncr.fonduri-ue.ro/log-in/>

resource for the NRSF monitoring, especially in access to disaggregated data on social inclusion projects. These include the current OPHC 2014-2020 and other funding programmes, but also from the perspective of the new financial framework 2021-2027, especially OPEE and OPIDS.

Jokingly, we found that the involvement in this strategy's design process of some central institutions, (MH, ME and MDPWA) was the result of fruitful professional and personal relationships. These relations were built after over years of collaboration between the people involved, rather than by the fulfilment of those responsible for their duties.⁹¹ The involvement of regional and county authorities in the implementation of the NRSF is provided in 'Annex 1 - Institutional Framework for the Implementation of the NRSF'. Each of the relevant implementation bodies and their responsibilities are described, stating the activities that COR and local experts should carry out to fulfil this mission.

The NRSF⁹² mentions that an important role will be played by other national structures and agencies.⁹³ Also, the NCCD can indirectly contribute by promoting the principle of non-discrimination against the Roma. The proposed approach for the involvement of regional and local authorities aims to strengthen subsidiarity that will be achieved according to the sharing of specific competencies and will ensure decision-making as close as possible to the citizen. Thus, we could consider that the new NRSF comes with a complex approach. This aims to empower local public authorities, in collaboration with decentralised institutions, enforcing distinct Roma social inclusion measures in the local development strategies. This is one of the four major strategic directions that the NRSF pursues in its new vision.

3.3. Quality of the plan

Within the NRSF, it is mentioned that "at the level of county and local authorities, the implementation measures of the NRSF 2021-2027 will be detailed and adapted to the specific conditions. These are materialised in county and local action plans, which will consider the integrated correlation between intervention domains in order to respond to the needs of both the community and each family that is part of it".⁹⁴ The NRSF has not developed a clear set of specific implementation indicators, instead leaves it to the discretion of local and county authorities through specific local and county action plans. An analysis of the action plans shows that the wording currently used in the headline sections of the NRSF action plans are of the following types: annual, permanent activities, half-yearly reporting on 30 June and 31 December, mentioning strictly annual benchmarks, etc. It is difficult to assess whether such deadlines are realistic, added to the generality of the concrete measures proposed. Many are recommendations rather than clear tasks to be performed by the responsible structures.

The NRSF does not have a section dedicated to identifying and analysing potential risks, although such risks do exist. Perhaps the most visible risk is that of securing NRSF funding, which shows a clear discrepancy between the generous text of the strategy and

⁹¹ Online interview with Daniel Rădulescu, Former President of NAR, 16 March 2022, Bucharest.

⁹² NRSF, 7.2.1. Coordination of NRSF implementation

⁹³ For example, the National Employment Agency (NAE), the National Agency for Equal Opportunities between Women and Men (NAEOWM), the National Authority for the Rights of Persons with Disabilities, Children and Adoptions (ANDPDCA), National Agency for Cadastre and Real Estate Advertising (ANCPI), National Qualifications Authority (ANC), People's Advocate (AP), Public Ministry (MP), National House of Public Pensions (CNPP), National Health Insurance Agency (CNAS), the National Administration of Penitentiaries (ANP), the General Inspectorate of the Romanian Police (IGPR), the General Inspectorate of the Romanian Gendarmerie (IGJR), the National Centre for Roma Culture '*Romano-Kher*' (NCRC).

⁹⁴ NRSF, 6. Expected Changes

the actual capacity to allocate and access the funds needed to implement the measures in the action plans. In the next period, Romania is expected to start using NRRP funds, European funds from the multiannual financial programming 2021-2027. These are relatively large amounts of money for which there is probably not enough absorption capacity at the level of local, regional, and central levels.

A technical assistance mechanism needs to be set up for vulnerable communities, for local government with limited resources and capacity. The risk is greater in terms of the use of available funds without such a mechanism to provide differentiated support to public administration structures. One cannot expect the same professional level from a City Hall of a county residence municipality and from a small City Hall in urban or rural area. The gap between their respective capacities is significant, to the advantage of bigger administrations that have access to better prepared staff, greater financial resources, the ability to contract consulting services, etc.⁹⁵ Starting with the first NRIS adopted in 2001 and continuing with the other adopted versions, all reports on the state of implementation and achievements have been rather critical, and the risk of a low impact of the new strategy is a major one.

3.4. Funding

The action plans in the Strategy do not provide clear information on the budget estimate of the proposed actions and activities. Moreover, the text of the Strategy states that “the budgetary implications for the period 2021-2027 will in principle remain at a level similar to the previous period”. However, in the official documents we do not find information on the budget used for the previous strategy (2014-2020). The necessary financing for the implementation of the Action Plans provided by the NRSF is made “by each institution or public authority responsible for implementation, from its own budget, both through the National Interest Programmes and through its own contribution from local and county authorities and European funds”.⁹⁶

However, the budget statements for the six action plans are not uniformly and consistently made, with differences in structure and wording depending on the team that worked on a particular topic and lacking an overview. For example, in the employment and entrepreneurship action plan, the only budget reference is “according to the approved budgetary resources for the responsible institutions”. While the housing action plan also contains information on budgeting through national programmes.

The only measures plan that provides for the budget estimates is the cultural identity and historical reconciliation, where the RNCC participated directly. The NRSF specifies that “funding is mainly based on budget allocations for various national sectoral programmes, as well as those provided for in the relevant strategies for the period 2021-2027”. However, there is no direct link with these national/sectoral programmes in the action plans. The principle of funding measures for Roma inclusion through the use of national programmes remains unsolved, the mechanism not being yet defined in the NRSF.

The position of the NRA representatives⁹⁷ regarding the financing of the NRSF is extremely pragmatic and refers to the use, first, of national funds, as follows: health

⁹⁵ Opinions expressed in interviews with Roma experts from the counties of Cluj (Valer Hoca), Botoşani (Jupiter Borcoi), Călăraşi (Daniel Stancu).

⁹⁶ GD 79/2022 for the Approval of the Romanian Government’s Strategy for the Inclusion of Romanian Citizens Belonging to the Roma Minority for the Period 2022-2027.

⁹⁷ Telephone interview with Iulian Stoian, Head of Public Policy, National Agency for Roma, 4 April 2022, Bucharest.

should be financed through the National Health programmes; education is already financed from the state budget, including places especially budgeted for young Roma in high school and college; and for employment, there are national plans and programmes in the national employment strategy. The reason behind this approach is simple: the Roma are Romanian citizens, and the programmes mentioned as examples are addressed to all Romanian citizens, regardless of their ethnicity. Furthermore, the NAR representatives consider that the non-reimbursable funds related to the future financial framework (2021-2027) and the NRRP can come to supplement the national efforts in specific interventions, both in the field of infrastructure and in soft areas.

An argument used by most of the experts interviewed in this regard was that we had strategies for Roma inclusion funded exclusively through European funds and it was quite clear how well they worked. Commitment to the NRSF funding starts from the entire existing Roma human resources at all levels (local, county, regional, national). It continues with the concrete identification of the programmes funded by the state budget for all its citizens, including those of Roma ethnicity, and the effective implementation of mechanisms to bring the services funded by these programmes to the Roma communities.

In the current national and international context, the allocation of resources will remain an issue, as will the development of interinstitutional mechanisms that work in a complementary and integrated way to keep the complex issue of Roma communities on the public agenda.

3.5. Monitoring and evaluation

The EU Framework brings to attention the need to establish a robust monitoring and evaluation system,⁹⁸ proposing a portfolio of indicators.⁹⁹ These can help MSs in developing their own M&E system, portfolio developed initially by the FRA and the EU Roma Working Party in 2020.¹⁰⁰ The Romanian NRSF reality is that the indicators mentioned in the action plans are very far from the explicit portfolio of indicators mentioned above.

The NRSF mentions the need for an adjustment of the evaluation and monitoring mechanism with an emphasis on the involvement of local authorities: ATUs, County Councils, and Local Councils.¹⁰¹ According to the NRSF, the monitoring and evaluation is done by the NAR, each public body involved have to report to the NAR in terms of monitoring and evaluation, without clear references to how to collect data. Monthly meetings of the MCRs and the line ministries' submission of progress reports to the NAR, who is the chair of the ICIMES, which meets quarterly are requested.¹⁰² The institutional structure established in the old NRIS is almost the same for the NRSF. However, the problem is not the mechanism, but rather the commitment of the institutes involved, as stated by one of the interviewed experts.¹⁰³

In addition to the current institutional structure, the MIEP intends to create a Monitoring Unit to monitor the implementation of sectoral measures in the NRSF, through the

⁹⁸ NRSF, Section 1, General Information, Point B - Description of the Current Situation

⁹⁹ See: https://ec.europa.eu/info/sites/default/files/portfolio_of_indicators_en.pdf

¹⁰⁰ See: https://fra.europa.eu/sites/default/files/fra_uploads/2020-portfolio_of_indicators_working-paper_en.pdf

¹⁰¹ NRSF, Section 3, Priorities, Policies, and the Current Legal Framework

¹⁰² NRSF, Section 7, Description of the Strategy's Implementation Mechanism

¹⁰³ Online interview with Daniela Tarnovschi, FRA, World Bank expert, 28 March 2022, Bucharest.

Operational Programmes and the preparation of progress reports for the NAR. In addition, the monitoring unit will participate in ICIMES.¹⁰⁴ The action plans specify deliverables and certain output indicators without mentioning very clearly the outcome indicators. Many indicators are mentioned at a general level without specifying concrete data, or percentages (e.g., low absenteeism; the number of young people trained, and such). Practically, such indicators cannot be measured because the reference, the baseline data, is not known.¹⁰⁵ While the monitoring of the implementation of the old strategies was done chaotically and no final report was prepared to present the implementation status based on the established indicators, there is also no specific budget allocated for monitoring, including CSOs, research institutes, etc. Large-scale studies should be undertaken to establish the starting reference point, the baseline that will allow progress to be measured. The NAR/NCPR should work closely with the FRA to develop a common indicator framework and involve relevant Roma experts and other professionals in the process.

Regarding the NCRC, this structure has a low profile and is not in a position to be involved in coordinating intergovernmental discussions on the distribution of EU funds for Roma. Also, NCRC does not have the institutional capacity to systematically monitor the use of EU funds, just as NAR does not have this capacity either.

3.6. Assessment of the expected effectiveness and sustainability

NRSF is a public policy document, a programmatic document that is not perfect. However, according to section 10.4 'Review of the 2022-2027 Strategy', the NRSF and implicitly the action plan can be revised "whenever needed" by the thematic working groups. Following the monitoring processes, the changing situations in the political context or depending on new relevant information regarding the general situation of the Roma population (for example, following the NIS's 'Census on Population and Housing in 2022'), as well as based on the conclusions and recommendations drawn from undertaken assessments.¹⁰⁶ Any potential revisions will involve consulting all public and civil society stakeholders, but will also take into account recommendations received from European structures.

The lack of disaggregated data is a major challenge in collecting and reporting on implementation progress. Representatives of Roma CSOs complained that many of the baseline data, targets, and indicators proposed in the consultation process were not considered in developing the strategy, while studies by national public structures or international studies were preferred.¹⁰⁷ The effectiveness of the implementation of the NRSF and the improvements in the condition of the Roma will be impossible to be properly evaluated as a direct result of the NRSF. However, improvements and achievements produced by the NRSF, and other mainstream national programmes can be considered. This over time detects an increase in the quality of life in Roma communities along with increasing the quality of life of the entire Romanian population. Monitoring the implementation of action plans and budgets allocated and used specifically for the NRSF will be able to add to the long-term effectiveness and sustainability of results.

The '2022 Population and Housing Census', will bring information needed to build or adjust public policies, including Roma. Still, data collection remains a problem, as online

¹⁰⁴ NRSF, section 7, Description of the Strategy's Implementation Mechanism

¹⁰⁵ NRSF, Annex 4, Action Plan Education

¹⁰⁶ NRSF, 7.4 Revision of NRSF 2021-2027

¹⁰⁷ Interview with Laura Greta Marin, President of Human Catalyst, 15 April 2022, Bucharest.

self-review is less available to those living in disadvantaged environments including the Roma.

4. ALIGNMENT WITH THE EU ROMA STRATEGIC FRAMEWORK

4.1. Reflecting diversity among Roma

The EU Strategic Framework calls on MSs to include in their NRSF “specific objectives and specific measures for Roma women, children and young people, people with disabilities, elderly Roma, mobile citizens of the EU, stateless Roma, and non-EU citizens (as appropriate) and break down indicators by gender and age”. Calls on MSs to “address the gender dimension in all areas, in particular education, employment, healthcare, child support and combating (multiple) discrimination, including (domestic) violence and exploitation”, as well as to “Promote participation and ensure that gender-sensitive measures” and “support Roma women’s access to justice to prevent/overcome domestic violence and other human rights”.¹⁰⁸

Unfortunately, in the NRSF, Roma women are not adequately represented and the NRSF does not contain a concrete and intersectional approach to the needs of Roma women in all areas covered. Specifically, while highlighting and presenting the vulnerable situation of Roma women, the strategy does not contain the answers to these problems with concrete measures and cross-cutting or special indicators. Domestic and gender-based violence against Roma women and children is not addressed by the NRSF. Several data sources unequivocally show that Roma women/girls are disproportionately affected by all known forms of violence (domestic violence, forced marriages, exploitation, and human trafficking). According to the NAEOWM data, Roma women in 2018 accounted for 46.5% (1,569) of the total number of victims of a certain ethnicity (3,374 victims) and that, in general, represents about 60% of victims of domestic violence, 83% of whom are minors.

The NRSF superficially took on a small number of gender indicators and introduced awareness raising campaigns on gender-based violence in the field of health, omitting the objectives and special measures for Roma women and children. Although the NRSF repeatedly mentions the intersectional approach, it does not address all vulnerable groups within this community with specific measures and indicators, thus illustrating the superficiality of the approach. Other groups, such as people with disabilities, the elderly Roma, EU mobile citizens, stateless Roma, and non-EU Roma, are not included in any area, measure, or indicator.

Culture is one of the areas where the most severe problems have been identified. The Roma do not know about their past, their history, and the majority population even less so. There are measures addressing cultural memory, its reflection in the public space, education, the media, and the theme of reconciliation with the historical past that appears in the form of the new strategy. These are a novelty compared to previous strategies. However, civil society considers that a more thorough approach to cultural issues, to identity issues, to memory issues, to reconciliation with the historical past is needed.

On the one hand, the NRSF does not sufficiently address the diversity of Roma people and their specific problems. On the other hand, NRSF, insofar as it succeeds in being implemented, can be beneficial for the inclusion of all Roma groups in their diversity and socio-economic context.

¹⁰⁸ EU Roma Strategic Framework for Equality, Inclusion, and Participation for 2020 – 2030

4.2. Combining mainstream and targeted approaches

The NRSF is an intersectoral strategy that connects with the main documents resulting from the European Semester 2020, as well as with the Annual Strategy on Sustainable Development, the Country Report, and the Country Specific Recommendations”.¹⁰⁹

A better implementation of the national strategy requires it to be integrated into national, regional, and local sectoral policies. The NRSF also mentions the correlation with other existing strategies in the field of social inclusion, poverty, employment, education and training, early school leaving, lifelong learning, and child protection. A Roma CSO’s representative¹¹⁰ emphasises that there is no thorough review of all national strategies. There is a lack of collaboration among all the ministries in Romania, and even more so when it comes to mainstream measures for Roma. Another expert¹¹¹ argues that the NCPR should act as a platform for monitoring public policies created by ministries that into consideration the needs of Roma in important fields such as housing, infrastructure, finance, funding programmes, health, education, or geographical areas. Promoting the inclusion of Roma in mainstream society must be the ultimate goal of all policies, if they intend to be inclusive.

At the same time, there is no permanent relationship and conversation between Roma civil society and Romanian ministries. Roma and pro-Roma organisations and professionals know the community’s problems at grassroots level, and have understood the viable solutions, but are often not consulted. On the other hand, ministries are preparing programmes, and they will use, as a rule, information from local authorities, while the Roma civil society can provide complementary information and solutions to community problems.

Although the diversity of Roma groups requires a specific approach, the principle of targeting the Roma community may be wrong, because “over time it has been proven that not only Roma have these problems when it comes to inclusion”. Issues such as poverty and inclusion do not concern Roma people exclusively, but the entire vulnerable population in Romania, which includes the Roma.¹¹²

The fact that most of the measures in the strategy are targeted at Roma communities is not necessarily a good thing. There are many Roma who have publicly assumed their ethnicity, but who still do not find themselves reflected in the strategy, or do not find themselves to be in need of any of the topics addressed. Although the strategy targets people who face significant barriers to accessing social services, health, education, employment, housing, etc., these barriers should not be viewed and addressed only from an ethnic perspective, as there are non-Roma who face the same problems. At the same time, there are Roma who do not face the situation set out in the strategy and do not need the targeted measures.

Another limitation that the measures targeted in the Strategy is the fact that it does not cover all different groups of Roma, especially Roma who do not identify as such.

¹⁰⁹ NRSF, 2. Principles and Vision

¹¹⁰ Interview with Costel Bercuş, President, ACEDO - *Asociația Centrul pentru Educație și Drepturile Omului* (The Center for Education and Human Rights Association), 16 March 2022, Bucharest.

¹¹¹ Online Interview with Bogdan Suditu, Housing and Development Activist and Expert, 1 April 2022, Bucharest.

¹¹² Online interview with Daniel Rădulescu, Former President of the National Agency for Roma, 16 March 2022, Bucharest.

The main institutions responsible for the implementation of the NRSF at the central level are the NAR, DIR, and the relevant line ministries, the NCCD. At the local level, the responsible institutions are Prefectures through the COR, local authorities, and decentralised public services. The NRSF envisages several measures at regional and local levels in all areas: education, employment, housing, health, cultural identity and combating discrimination. Although the strategy lays down in its text many tools, both local, regional, and central, they are not correlated with each other neither locally nor centrally. In addition to the institutions mentioned above, according to the website of the MIEP, the NCPR is responsible for coordinating national efforts to improve the situation of Roma, involvement in the evaluation and monitoring of the progress, for reporting them to the European Commission and for formulating proposals for the adaptation and revision of the Strategy.¹¹³

In conclusion, we can say that although there are measures and tools both locally and regionally, they are not correlated with each other, nor at the national level, so their effectiveness is not known or measured. Taking responsibility for collecting, reporting data, and implementing measures is essential for the success of the strategy, as well as for the credibility of the institutions responsible for the NRSF.

4.3. Usage of instruments introduced by the Council Recommendation

The NRSF generally covers the areas of actions proposed by the EU Framework in terms of thematic priorities - education, employment, health, and housing but it is missing the focus on essential services and adding Roma identity and culture as an important topic. As for the horizontal priorities (antigypsyism, social exclusion, poverty, and participation), the NRSF is focusing on the fight against discrimination, hate speech and hate crime, ensuring funding and synergies with other programmes – missing the antigypsyism focus.

The NRSF pays increased attention to racist, anti-Roma and discriminatory attitudes and through Specific Objective 6 aims to “Combat discrimination, anti-Roma discourse and attitudes that generate hate speech or hate crimes”.¹¹⁴ The main measures taken to achieve this goal are campaigns and debates, without any concrete support for victims of anti-Roma attitudes and actions, as the Council mentions in its recommendations.¹¹⁵

The strategy uses the term “quality inclusive education”, which is also found in the recommendations of the Council. One of the sectoral objectives is to ensure the access of Romanian Roma citizens to a quality inclusive education system, and the proposed measures aim to increase school participation, improvement of school infrastructure, development of teachers’ skills, etc. The plan of measures in education also provides for actions to combat segregation.

¹¹³ See at: <https://pncr.fonduri-ue.ro/>

¹¹⁴ NRSF. Specific Objective 6. Action Plan for Combating Discrimination, Anti-Roma Discourse and Attitudes Generating Hate Speech or Hate Crimes.

¹¹⁵ Recommendation of the Council of the European Union of 12 March 2021 on Roma equality, Inclusion, and Participation (2021 / C 93/01), Official Journal of the European Union (2021 / C 93/01). Available at: [https://eur-lex.europa.eu/legal-content/RO/TXT/PDF/?uri=CELEX:32021H0319\(01\)&from=EN](https://eur-lex.europa.eu/legal-content/RO/TXT/PDF/?uri=CELEX:32021H0319(01)&from=EN)

CONCLUSIONS AND RECOMMENDATIONS

The Romanian Government just adopted the new NRSF on 28 April 2022, when the writing of the present report was nearly finished. The adoption process started in February 2020, following a large consultation process with Roma representatives active at the local, county, and central levels, with Roma and pro-Roma NGOs and community-based organisations (consultative Committee of the NAR), as well as academics, experts etc. The interinstitutional consultations generated the final version. During 2021, the adoption of the new Strategy was influenced by the changes in the Government - two new appointments of the Ministries of Health and European Funds - have impacted the deadline proposed by the European Commission to the Member States to present the NRSF (October 2020). The political volatility has also influenced the adoption schedule and compliance with the deadline.

It is a strong element that the NRSF is built on the foundation of the ten common Roma inclusion principles.¹¹⁶ It has a vision focused on the establishment of an approach geared towards achieving sustainable results, through the resilient, tailor-made adjustment of support, guidance, and motivation measures.

According to the NRSF, the final beneficiary (a citizen in a vulnerable situation) should be placed at the centre of the concerns of the responsible authorities at local level. However, these declared principles, vision and focus on the vulnerable beneficiaries, will need to be proven in implementation.

The NRSF, according to our analysis, does not include concrete minimum common targets and indicators as suggested by the EU Framework portfolio of indicators. The formulation currently used in the deadline section of the NRSF action plans are of following types: annual, activities of a permanent nature, half-yearly reporting, annual milestones, etc. Therefore, it is difficult to assess whether such deadlines are realistic, in conjunction with the generality of the concrete measures proposed. Many of them are merely recommendations rather than clear tasks to be carried out by the responsible structures. At local level, the NRSF leaves to the discretion of local and county authorities the implementation of concrete and quantifiable measures through specific local and county action plans. More, baseline references for the mentioned indicators are missing, so, in this way, any numbers/percentages/increase/decrease etc. may be considered a positive development.

The NRSF partially covers the specific problems faced by Roma children, women, youth, elderly Roma or those with disabilities, EU mobile citizens, non-EU nationals, stateless Roma. However, it does not provide concrete measures and cross-cutting or special indicators for them. In terms of antigypsyism and discrimination, the NRSF plan is primarily aimed at combating institutional racism in the public and private spheres, monitoring hate speech, preparing reports, conducting awareness campaigns, and creating educational materials.

The plans of measures related to the Strategy do not provide clear indications of the budgetary estimation of the proposed actions and activities. It is also specified in the text of the Strategy that "the budgetary implications for the period 2022-2027 will, in principle, remain at a similar level to the previous period". However, there is no information in the official documents about the budget used for the previous strategy (2014-2020), as the previous NRSF has never been evaluated properly. Having in mind

¹¹⁶ European Commission, Directorate-General for Employment, Social Affairs and Inclusion, *The 10 common basic principles on Roma inclusion: vademecum*, Publications Office, 2010, available at: <https://data.europa.eu/doi/10.2767/22771>

the lack of financial resources and local political agenda, it is questionable how the local action plans will be funded without a clear central support mechanism. The development of the state budget for 2023 will be a real-time test of the commitment to fund the NRSF, especially for the line ministries.

It is stated in the NRSF that the Strategy's monitoring plan will be drawn up by the NAR, in collaboration with the ministries responsible for implementing the Strategy and will be subject to approval by the ICIMES during the first meeting. The ICIMES has just been set up through Government Decision¹¹⁷ and consists only of public structures at the central level, while the Roma organisations will continue to be consulted through the the NAR Consultative Committee. The NRSF has no concrete and consistent measures to strengthen the capacity of Roma civil society. While it has been assigned a role, at least theoretically, in the monitoring and evaluation of NRSF, without specifying the concrete ways in which the civil society will be empowered.

20 years after the first NRSF, with an almost identical implementation structure, it is not possible to assess if the new strategy will make a difference. It is obvious that not the mechanism is the problem, but the commitment of the institutions involved, the accountability of these structures towards a lower political power structure like the NAR that is responsible for development, implementation, and monitoring of the NRSF at the same time.

Recommendations to national authorities

1. The Government should make sure that the appropriate funding for the implementation of the NRSF is allocated in the state budget (every year, during state budget development). Line ministries should be accountable for specific budget allocations and report on spending (reporting annually).
2. The National Agency for Roma should:
 - a. continue to develop and work with the Consultative Committee especially on attracting the most active and experienced Roma NGOs.
 - b. work with the FRA to develop specific indicators in all priority areas, based on the portfolio of indicators developed by the FRA.
3. The Ministry of Investment and European Projects, in collaboration with the NAR should use the available technical assistance funds for an annual, external, independent evaluation of the progress of the NRSF. The Government should use the evaluation results to adjust the action plans in the NRSF accordingly.
4. Clarify the responsibilities of the National Agency for Roma and the National Contact Point for Roma and allocate the resources needed to properly implement, monitor and evaluate the NRSF.
5. Strengthen the role of the National Agency for Roma in:
 - a. providing support to line ministries responsible for the implementation of the strategy in non-Roma specific areas (education, housing, health).
 - b. strengthening the coordination role of Roma experts – county offices for Roma, local experts on Roma issues, school, and health mediators, etc.

¹¹⁷ Decision no. 336/2022 regarding the Set up of the Interministerial Committee for the Implementation, Monitoring and Evaluation of the NRSF for the Period 2022-2027, published in Official Gazette, Part I no. 520/26.05.2022.

- c. coordinating the objectives of the strategy aimed at promoting identity, historical reconciliation, and anti-discrimination, in collaboration with the National Roma Cultural Centre and National Contact Point for Roma.
 - d. ensuring proper interministerial coordination and management of the strategy implementation, monitoring, and evaluation.
6. Allocate the resources for setting up relevant structures for the representation of Roma culture and history like Roma Museum, Roma Theatre etc, to raise the Roma status and acknowledge the Roma contribution to the development of the Romanian society.
7. At the next revision of the NRSF, adequately:
 - a. include Roma participation and empowerment as a horizontal objective, develop specific measures and allocate resources accordingly.
 - b. develop a set of measures for preventing and fighting antigypsyism and discrimination, and segregation in education and housing.
 - c. represent Roma women and develop concrete and intersectional approaches to the needs of Roma women in all areas covered.

Recommendations to European institutions

8. European institutions, including the Fundamental Rights Agency and the European Commission, should make resources available to continue developing the capacity of Roma and pro-Roma NGOs for independent evaluations of the NRSF implementation – continue to develop the ‘Roma Civil Monitor’ Programme (financial support for capacity building, developing monitoring reports, exchange of good practices, advocacy etc.).
9. European Commission should develop a consistent mechanism to monitor and report on the progress in the implementation of national strategies in the Member States and include the monitoring conclusions and recommendations in the European Semester framework.

Recommendations to the civil society

10. Consistent participation in consultations with public authorities in developing and implementing public policies for Roma and active participation of Roma NGOs in the Consultative Committee of the National Agency for Roma.
11. Increased activity of Roma NGOs at the local and county level in developing, in collaboration with the local authorities, based on the new NRSF, coherent local action plans for Roma inclusion (by the end of 2022, with the perspective of budget allocations for 2023), focus on consolidating tested intervention approaches and innovate for better inclusion.
12. Share the good practices, especially the funding and implementation ones, developed locally with the rest of the Roma NGOs in the country.

Recommendations to other stakeholders

13. Develop a forum of discussions with the most relevant stakeholders - including government, private donors, academia, international organisations etc., to share experiences, avoid overlapping and maximise intervention results.

REFERENCES

List of interviews

Type of respondent	Affiliation	Names of person	Date of interview	Type
Public authority in charge of the NRSF drafting	National Agency for Roma	Daniel Rădulescu – NAR ex-President	16 March, 2022	Online, Zoom
	National Agency for Roma	Iulian Stoian – Head of Public Policy	4 April 2022	Telephone
	National Contact Point for Roma	Elena Iordănescu – NCPR expert	22 March 2022	Online, Zoom
Public authorities with responsibility in key areas	Ministry of Education	Marian Daragiu – Sub-State Secretary	30 March 2022	Telephone
	Ministry of Investments and European Projects	Claudia Magdalena - Head of Social Cohesion Evaluation of programs and Policies	22 March 2022	Online, Zoom
	National Public Health Institute	Adriana Galan - Head of Service Health Assessment and Non-communicable Diseases Priority	31 March 2022	E-mail
	Ministry of Health	Lidia Manuela Onofrei - National Coordinator of Community Health Care Activity	29 March 2022	Online, Zoom
	Ministry of Development, Public Works and Administration	Anghel Gheorghiu – former Sub- State Secretary; currently Mayor of Bucecea	29 March 2022	Online, Zoom
	National Roma Culture Centre	Mihai Neaşcu -- Director	25 March 2022	In person
	Ministry of Labour and Social Solidarity	Alina Pop – former State Secretary	30 March 2022	Online, Zoom
National equality body	National Council for Combating Discrimination – 1	Catalina Olteanu	30 March 2022	In person
Regional and local authorities in key regions	Cluj County Prefecture, County Office for Roma	Valer Hoca – Roma Expert	4 April 2022	Telephone
	County Council Călăraşi	Daniel Stancu – Roma Expert	4 April 2022	Online
	Dorohoi Municipality	Jupiter Borcoi – Roma Expert	6 April 2022	Online
Public authorities in charge of statistics	National Institute of Statistics	Vladimir Alexandrescu – expert	31 March 2022	In person

Roma civil society and activists	CADO	Cerasela Bănică - President	4 April, 2022	Online, Zoom
	E-Romnja	Carmen Gheorghe - President	1 April, 2022	Online, Zoom
	Human Catalyst Association	Laura Greta Marin - President	15 April, 2022	Online, Zoom
	Împreună Agency for community development	Gelu Duminică - Executive Director	29 March, 2022	Online, Zoom
	ACEDO	Costel Bercuş - President	16 March, 2022	In person
	Amare Romenza	Delia Grigore - President	22 March, 2022	Online, Zoom
Academics, experts, analysts, international organisations, donors, diplomats	Bucharest University, Sociology Department	Marian Ursan - Lecturer; Expert Vulnerable and Marginal Groups	14 March, 2022	In person
	Bucharest University, Geography Department	Bogdan Suditu - Senior Lecturer; Housing/Regional Development Expert	1 April, 2022	Online, Zoom
	FRA, WB consultant	Daniela Tarnovschi - Expert, Sociologist	28 March 2022	Online, Zoom
	Research Centre for Education and Life Chances	Claudiu Ivan - CEO; Public Policy Expert	March 2022	Online, Zoom
	UNICEF Romania	Simona Torotcoi - Educational and Roma Inclusion Consultant	31 March 2022	Online, Zoom

Key policy documents and reports

EU Agency for Fundamental Rights, *Fundamental Rights Report 2019*. Available at: https://fra.europa.eu/sites/default/files/fra_uploads/fra-2019-fundamental-rights-report-2019_en.pdf

EU Agency for Fundamental Rights, *Second European Union Minorities and Discrimination Survey*, October 2018. Available at: https://ec.europa.eu/knowledge4policy/dataset/ds00141_en

European Commission against Racism and Intolerance, *ECRI Report on Romania – June 2019*. Available at: <https://rm.coe.int/fifth-report-on-romania/168094c9e5>

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

European Parliament, Rept on the implementation of National Roma Integration Strategies: combating negative attitudes towards people with Romani background in Europe, 4 September 2020 (2020/2011(INI)). Available at: https://www.europarl.europa.eu/doceo/document/A-9-2020-0147_EN.html

European Union Agency for Fundamental Rights, *Monitoring framework for an EU Roma Strategic Framework for Equality, Inclusion and Participation: Objectives and indicators*. Available at: https://fra.europa.eu/sites/default/files/fra_uploads/2020-portfolio_of_indicators_working-paper_en.pdf

*HOTĂRÂRE nr. 18 din 14 ianuarie 2015 (*actualizată*) pentru Aprobarea Strategiei Guvernului României de Incluziune a Cetățenilor Români Aparținând Minorității Rome pentru Perioada 2015-2020 (actualizată la data de 23 septembrie 2015*)* [DECISION no. 18 of 14 January 2015 (*updated*) Approving the Romanian Government Strategy for the Inclusion of Romanian Citizens Belonging to the Roma Minority for the Period 2015-2020]. Available at: <https://legislatie.just.ro/Public/DetaliiDocument/164836>

Hotărârea Guvernului nr. 561/2009 pentru Aprobarea Regulamentului privind Procedurile, la Nivelul Guvernului, pentru Elaborarea, Avizarea și Prezentarea Proiectelor de Documente de Politici Publice, a Proiectelor de Acte Normative, precum și a altor Documente, în Vederea Adoptării/Aprobării [Government Decision no. 561/2009 for the Approval of the Regulation on the Procedures, at Government Level, for the Preparation, Endorsement and Submission of Draft Public Policy Documents, Draft Normative Acts and Other Documents for Adoption/Approval]

Hotărârea Guvernului nr. 775/2005 pentru Aprobarea Regulamentului privind Procedurile de Elaborare, Monitorizare și Evaluare a Politicilor Publice la Nivel Central, cu Modificările și Completările Ulterioare [Government Decision no. 775/2005 Approving the Regulation on the Procedures for Drafting, Monitoring and Evaluation of Public Policies at Central Level, with Subsequent Amendments and Additions]

Hotărârea Guvernului nr. 870/2006 privind Aprobarea Strategiei pentru Îmbunătățirea Sistemului de Elaborare, Coordonare și Planificare a Politicilor Publice la Nivelul Administrației Publice Centrale [Government Decision no. 870/2006 on the Approval of the Strategy for the Improvement of the System of Elaboration, Coordination and Planning of Public Policies at the Level of Central Public Administration]

IRES (2018). *Studiu Comparativ a Nevoilor Comunităților de Romi în Contextul Stabilirii Priorităților Strategice de Intervenție pentru Incluziunea Socială a Acestora* [Comparative Study of the Needs of Roma Communities in the Context of Setting Strategic Intervention Priorities for Their Social Inclusion]. Cluj-Napoca: IRES

Metodologie și Proceduri pentru Realizarea Documentelor Strategice Subcomponenta 3: Raport Final privind "Ghid pentru Dezvoltarea Strategiilor" [Methodology and Procedures for the Development of Strategic Documents Sub-component 3: Final Report on "Guidance for Strategy Development"]. Available at: <https://sgg.gov.ro/1/wp-content/uploads/2020/09/ghid-pentru-dezvoltarea-strategiilor.pdf>

Ministry of European Funds, *Memorandum, Stadiul Măsurilor Necesare Îndeplinirii Condițiilor Favorizante 2021-2027* [Status of Measures Needed to Meet the Enabling Conditions 2021-2027]. Available at: <https://sqq.gov.ro/1/wp-content/uploads/2020/03/MEMO-3.pdf>

Ministry of Investments and European Projects, *Planul Național de Redresare și Reziliență* [National Recovery and Resilience Plan]. Available at: <https://mfe.gov.ro/pnrr/>

National Agency for Roma, *Raport al Agenției Naționale pentru Romi cu Privire la Necesitatea Intervenției Autorităților Competente în Beneficiul Membrilor Comunităților Vulnerabile cu Romi, în Contextul Implementării Măsurilor de Prevenire a Răspândirii Virusului COVID-19* (16 April 2020) [Report of the National Agency for Roma on the Need for Intervention by the Competent Authorities for the Benefit of Members of Vulnerable Roma Communities in the Context of the Implementation of Measures to Prevent the Spread of the COVID-19 Virus]. Available at: http://anr.gov.ro/images/Site2020/2020.05.25/Adresa-670_16.04.2020.pdf

National Agency for Roma, *Recomandare de Politică Publică în Domeniul Incluziunii Sociale a Membrilor Comunităților cu Romi din România pentru Perioada 2021-2027* [Public Policy Recommendation in the Field of Social Inclusion of Members of Roma Communities in Romania for the Period 2021-2027]. Available at:

<http://anr.gov.ro/images/Site2020/Documente/ANR---Text-prezentare-noua-viziune-a-viitoarei-NRIS-2021-2027---19.02.2020-FINAL-pentru-website.pdf>

Roma Civil Monitor, *Civil society report monitoring the implementation of the national strategy for Roma integration in Romania. Focus on structural and horizontal preconditions for the successful implementation of the strategy*, 2018. Available at: <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-1-romania-2017-eprint-fin-2.pdf>

World Bank, (coord. Emil Teșliuc, Vlad Grigoraș, Manuela Stănculescu), *Ce Este Necesar pentru Realizarea Incluziunii Romilor din România?* [What Is Needed to Achieve Roma Inclusion in Romania?]. 2014. Available at: <https://www.worldbank.org/content/dam/Worldbank/document/eca/romania/Summary%20Report%20RomanianAchievingRoma%20Inclusion%20RO.pdf>

ANNEX: LIST OF PROBLEMS AND CONDITIONS

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	significant problems	understood with limitations	adequate but with room for improvement	some targets but not relevant
Prejudice against Roma	significant problems	identified and analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement
Hate crimes against Roma	significant problems	understood with limitations	present but insufficient	some targets but not relevant
Hate speech towards and against Roma (online and offline)	significant problems	understood with limitations	present but insufficient	some targets but not relevant
Weak effectiveness of protection from discrimination ¹¹⁸	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Segregation in education, housing, or provision of public services	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Forced evictions and demolitions leading to homelessness, inadequate housing, and social exclusion	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Statelessness, missing ID documents	minor problems	irrelevant	absent	absent
Misconduct and discriminatory behaviour by police (under-policing/under-policing)	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Barriers to <i>de facto</i> exercise of EU right to free movement	significant problems	irrelevant	absent	absent

¹¹⁸ Despite the antidiscrimination law that is in place, people may face barriers (both internal, such as a lack of awareness or resources; or external, such as complicated administrative rules) in benefiting from it. Therefore, diverse measures may be adopted to facilitate people's access to protection against discrimination: the right to file a complaint with the equality body or the courts in the public interest (i.e., a CSO files the complaint instead of individual victims of discrimination); free-of-charge legal advice/aid from the equality body or other public authority or the CSO receiving public funding for this purpose; or complaints investigated by the equality body.

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

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	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Lower quality of pre-school education and ECEC services for Roma	significant problems	irrelevant	absent	absent
High drop-out rate before completion of primary education	significant problems	irrelevant	present but insufficient	some targets but not relevant
Early leaving from secondary education	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Secondary education/vocational training disconnected from labour market needs	significant problems	irrelevant	present but insufficient	some targets but not relevant
Misplacement of Roma pupils into special education	significant problems	irrelevant	absent	absent
Education segregation of Roma pupils	significant problems	understood with limitations	present but insufficient	some targets but not relevant
Increased selectivity of the educational system resulting in concentration of Roma or other disadvantaged pupils in educational facilities of lower quality	significant problems	identified and analysed sufficiently	present but insufficient	some targets but not relevant
Limited access to second-chance education, adult education, and lifelong learning	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Limited access to and support for online and distance learning if education and training institutions close, as occurred during the corona virus pandemic	significant problems	irrelevant	absent	absent
Low level of digital skills and competences and limited opportunities for their development among pupils	significant problems	irrelevant	absent	absent

Low level of digital skills and competences and limited opportunities for their development among adults	significant problems	irrelevant	absent	absent
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Employment

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Poor access to or low effectiveness of public employment services	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Youth not in employment, education or training (NEET)	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Poor access to (re-) training, lifelong learning and skills development	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Discrimination on the labour market by employers	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Risk for Roma women and girls from disadvantaged areas of being subjected to trafficking and forced prostitution	significant problems	irrelevant	absent	absent
Primary labour market opportunities substituted by public work	irrelevant	irrelevant	absent	absent
Barriers and disincentives to employment (such as indebtedness, low income from work compared to social income)	significant problems	irrelevant	absent	absent
Lack of activation measures, employment support	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant

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)	significant problems	identified and analysed sufficiently	present but insufficient	some targets but not relevant
Poor supply/availability of healthcare services	significant problems	mentioned but not analysed	absent	absent

(including lack of means to cover out-of-pocket health costs)		sufficiently		
Limited access to emergency care	significant problems	mentioned but not analysed sufficiently	absent	absent
Limited access to primary care	significant problems	identified and analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement
Limited access to prenatal and postnatal care	significant problems	identified and analysed sufficiently	present but insufficient	some targets but not relevant
Limited access to health-related information	significant problems	identified and analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement
Poor access to preventive care (vaccination, check-ups, screenings, awareness-raising about healthy lifestyles)	significant problems	identified and analysed sufficiently	present but insufficient	some targets but not relevant
Poor access to sexual/reproductive healthcare and family planning services	significant problems	identified and analysed sufficiently	present but insufficient	some targets but not relevant
Specific barriers to better healthcare of vulnerable groups such as elderly Roma people, Roma with disabilities, LGBTI and others	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Discrimination/antigypsyism in healthcare (e.g., segregated services, forced sterilisation)	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Unrecognised historical injustices, such as forced sterilisation	Irrelevant	Irrelevant	absent	absent
Inequalities in measures for combating and preventing potential outbreaks of diseases in marginalised or remote localities	significant problems	Irrelevant	absent	absent

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	significant problems	mentioned but not analysed	present but insufficient	some targets but not relevant

slum housing)		sufficiently		
Lack of access to drinking water	significant problems	understood with limitations	present but insufficient	some targets but not relevant
Lack of access to sanitation	significant problems	understood with limitations	present but insufficient	some targets but not relevant
Lack of access to electricity	significant problems	understood with limitations	present but insufficient	some targets but not relevant
Limited or absent public waste collection	significant problems	mentioned but not analysed sufficiently	absent	absent
Restricted heating capability (families unable to heat all rooms/all times when necessary) or solid waste used for heating	significant problems	Irrelevant	absent	absent
Lack of security of tenure (legal titles are not clear and secure)	significant problems	understood with limitations	present but insufficient	some targets but not relevant
Lacking or limited access to social housing	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Overcrowding (available space/room for families)	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Housing-related indebtedness at levels which may cause eviction	significant problems	mentioned but not analysed sufficiently	absent	absent
Housing in segregated settlements/ neighbourhoods	significant problems	understood with limitations	absent	absent
Housing in informal or illegal settlements/ neighbourhoods	significant problems	understood with limitations	present but insufficient	some targets but not relevant
Exposure to hazardous factors (living in areas prone to natural disasters or environmentally hazardous areas)	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Limited or lacking access to public transport	significant problems	understood with limitations	present but insufficient	some targets but not relevant
Limited or lacking internet access (e.g., public internet access points in deprived areas, areas not covered by broadband internet)	significant problems	Irrelevant	absent	absent
Limited or lacking access to green spaces	significant problems	Irrelevant	absent	absent
Roma excluded from environmental democracy	significant problems	Irrelevant	absent	absent

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	significant problems	understood with limitations	present but insufficient	some targets but not relevant
Income support programmes fail to guarantee an acceptable level of minimum income for every household	significant problems	mentioned but not analysed sufficiently	absent	absent
Limited access to income support schemes (low awareness, barrier of administrative burdens, stigma attached)	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Ineffective eligibility rules (well-designed means-testing ensures that those who need support can get it; job-search conditions ensure the motivation for returning to work)	irrelevant	Irrelevant	absent	absent
Low flexibility of income support programmes for addressing changing conditions of the household	significant problems	Irrelevant	absent	absent
Discrimination by agencies managing income-support programmes	significant problems	mentioned but not analysed sufficiently	absent	absent
Risk of municipalities misusing income support to buy votes	significant problems	Irrelevant	absent	absent

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	significant problems	irrelevant	absent	absent
Limited access to social services: low awareness of them, low accessibility, (e.g., due to travel costs) or limited availability	significant problems	mentioned but not analysed sufficiently	absent	absent
Services providers do not actively reach out	significant problems	mentioned but not analysed	absent	absent

to those in need		sufficiently		
Limited ability of social services to effectively work together with other agencies (e.g., public employment service) to help clients	significant problems	irrelevant	absent	absent
Discrimination by social service providers	significant problems	understood with limitations	present but insufficient	some targets but not relevant
Lack of adequacy of programmes for addressing indebtedness (providing counselling and financial support)	significant problems	irrelevant	absent	absent

Child protection

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

Inadequate child/adolescent participation	significant problems	irrelevant	absent	absent
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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	significant problems	understood with limitations	adequate but with room for improvement	adequate but with room for improvement
Exclusion of Roma communities from national cultural narratives	significant problems	identified and analysed sufficiently	present but insufficient	some targets but not relevant
Romani history and culture not included in school curricula and textbooks for both Roma and non-Roma students	significant problems	identified and analysed sufficiently	present but insufficient	some targets but not relevant
Lack of inclusion of Romani language in schools, and development of necessary educational materials and resources for Romani language preservation and teaching	significant problems	identified and analysed sufficiently	present but insufficient	some targets but not relevant
Lack of memorialisation of Roma history through establishing monuments, commemorative activities, and institutionalising dates relevant to Roma history	significant problems	identified and analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement

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