



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

**Prepared by:**  
European Roma Forum in Estonia  
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## LIST OF ABBREVIATIONS

CoE	Council of Europe
EHIS	Estonian Education Information System
ERFE	European Roma Forum in Estonia
INSA	Integration Foundation of Estonia
MoC	Ministry of Culture
MSA	Ministry of Social Affairs
NGO	Non-Governmental Organisation
NPR	National Population Register
NRCP	National Roma Contact Point
NRSF	National Roma Strategic Framework
RCM	<a href="#">Roma Civil Monitor</a>

## EXECUTIVE SUMMARY

There is no national plan or policy targeting Roma equality, inclusion, and participation in Estonia. Consistent with its previous approach, the government has issued the '*Cohesive Estonia Strategy 2030*', which mentions Roma four times as an afterthought with no serious measures for achieving meaningful outcomes. Even those outcomes remain vaguely defined, insufficient, and inconsistent. The measures proposed in this strategy do not reflect the guidelines proposed in either the Council Recommendations or the EU Roma Strategic Framework. Weaknesses lie particularly in the fact that no research was done to analyse and evaluate the situation of Roma and that the Roma communities and CSOs were not involved in any policy making process. Only in an addendum to the strategy are any aspects of Roma history and culture addressed. Finally, in the absence of a dedicated budget, the Estonian strategy remains a declarative document.

### Participation

The Cohesive Estonia Strategy 2030 seems to have been prepared in a top-down approach, without the involvement of any Roma NGOs other than providing invitations for general discussion panels and offering the possibility to comment on a final draft. Two small-scale studies have been undertaken in the past five years concerning the situation of the Roma in Estonia by the Ministry of Culture.

### Relevance

The generic findings and recommendations to improve employment and education outcomes, as well as supporting mastery of the Estonian language for Roma and offering knowledge of Roma arts culture and history for the general population are welcomed; however, there are no specific measures, budgets, or timelines for these items. Discrimination, antigypsyism, capacity building, health care, housing, essential services, and social protection remain unaddressed.

### Expected effectiveness

Many specific items identified in previous reports remain unaddressed even among the recommendations that are mentioned, remaining declarative promises without progress or results, and no monitoring mechanisms are mentioned. Without Roma participation, specific measures, earmarked budgets or further details, no degree of effectiveness can be expected.

### Alignment with the EU strategic framework

As already mentioned, the measures proposed in the strategy do not reflect the guidelines proposed in either the Council Recommendations or the EU Roma Strategic Framework.

# INTRODUCTION

## *National Roma strategic framework*

Estonia does not have any national Roma strategic framework (NRSF) – neither in the form of a dedicated strategy nor as an integrated set of measures. It continues to respond to the demands of the EU concerning Roma by referring to its ten-year national integration and cohesion strategy, which has been updated in a document entitled '*Cohesive Estonia Strategy 2030*', to which a supplemental policy document exists entitled '*Integration, incl. Adaptation Programme 2022-2025*'. This is an all-encompassing document on social cohesion, addressing linguistic and cultural diversity in Estonia referring to Russians, immigrants, emigrants, older people, younger people, women, churches, and communities in general. It is a thirty-nine-page document and continues along the same lines of its previous strategies, consistently since 2017. No significant development of Roma civil society has taken place. The supplement is twenty-nine pages and mentions the existence of several organisations in which Roma and government officials participate. This participation is envisioned to continue and is described as successful.

No key milestones, metrics or measures concerning Roma exist in the Cohesive Estonia Strategy 2030. Therefore, no improvements in the level of engagement in society, no increased capacity for Roma civil society, no increases in Estonian language comprehension, no improvements in educational outcomes, no improvements in labour market participation, nor any general awareness of any issues can be expected with respect to Estonian Roma citizens.

## *About this report*

The 2018 Roma Civil Monitor (RCM) report uncovered that the current policy of treating the Roma as any other cultural minority led to their specific needs and challenges being overlooked and revealed the need for active Roma advocacy organisations to participate in consultations with the government and highlight the specific needs of the Roma communities. The 2019 RCM report investigated the reasons behind the lack of active Roma rights advocacy organisations in Estonia: the obstacles Roma organisations face, as well as the options for the State to empower the Roma civil society to represent Roma interests on a high level.

For this RCM report, the authors performed three major interviews with members of the Estonian Integration Foundation,<sup>1</sup> the Ministry of Social Affairs, and the Ministry of Culture of Estonia. The authors also sent information requests to members of the NGO European Roma Forum in Estonia (ERFE), PhD and master's researchers in Romani ethnology, and in Romani language and multilingualism, the Ministry of Culture (MoC) acting as the National Roma Contact Point (NRCP), a leading specialist in social work in Valga, and to other Roma experts and activists. Overall coordination and validation were performed by Ms Zalina Dabla from ERFE. Composition of the report was performed by Mr William Bila.

The responses (and lack of responses) consistently support the conclusions that no greater awareness has been achieved concerning the lack of any development regarding either the social inclusion or the capacity building of the Roma civil society since 2017 and none can be expected under current conditions.

The report provides information on the situation at its cut-off date (July 2022).

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<sup>1</sup> The Foundation was established by the Republic of Estonia, whose founders' rights are exercised by the Ministry of Culture: <https://integratsioon.ee/en/about-us>

# 1. PARTICIPATION

## 1.1. Roma participation in the NRSF preparation

According to the latest statistics (31 December 2021) from the National Population Register (NPR), there are 676 people living in Estonia who self-identify as Roma.<sup>2</sup> The Council of Europe (CoE) estimates that there are approximately 1,250 Roma living in Estonia, representing about 0.1% of the population.

The Roma population in Estonia is divided into three larger groups – Estonian, Latvian, and Russian Roma. Linguistically they belong to either Latvian or Russian dialect groups.<sup>3</sup> Approximately 40% of the Roma in Estonia hold Estonian citizenship, 38% hold Latvian citizenship, 14% Russian citizenship, and 7% are stateless.<sup>4</sup>

Roma policies do not receive much attention in Estonia; there is no national strategy on Roma equality, inclusion, and participation. The development plan includes no specific measures for the Roma communities, although there are specific measures for newly arrived immigrants and residents of other nationalities. The plan includes general measures directed at non-native Estonian-speaking minorities that could benefit the Roma as well.

In the last five years, there has not been any Roma-specific research conducted either by the Integration Foundation or the Ministry of Social Affairs involving Roma. The Ministry of Culture however has included Roma in a study on the sense of belonging to the Estonian society, as well as the socio-economic situation of Roma in 2018-2019, and a new study was announced for 2022. There is no information available on how the results of these studies have been used in the planning of any policies or activities involving the Roma communities. At the same time, the MoC claims that they do not have enough representative data due to the small size of the Roma population and that they prefer to rely on personal contacts as a means of communicating to consult and empower the Roma communities. Apparently, due to the closed nature of the Roma communities, there is no other method of engaging; however, since the beginning of such activities, there hasn't been any documented progress either relating to improved civic participation, economic well-being, or social cohesion.

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

As no specific plan concerning Roma was developed, there is no participation in either the implementation or the monitoring. The authors have not found any information about Roma participation in the development of the country's strategic documents 'Cohesive Estonia Strategy 2030', or its supplemental document 'Integration, incl. Adaptation Program 2022-2025'.

## 1.3. System of policy consultation with civil society and stakeholders

To map the challenges that the Roma communities face, the Ministry of Culture (MoC), as the National Roma Contact Point (NRCP), established the Roma Integration Council<sup>5</sup> in 2015. The Council's role is to analyse the existing problems and propose ideas to different

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<sup>2</sup> Population and Housing Census. (2021). *RL21428: POPULATION BY ETHNIC NATIONALITY, SEX AND PLACE OF RESIDENCE (SETTLEMENT REGION)*, 31 December 2021: <https://www.stat.ee/>

<sup>3</sup> See more at: Factsheets on Romani Culture: <http://romafacts.uni-graz.at/?c=culture&ch=3&f=7>

<sup>4</sup> E-mail from the Estonian Population Register (6 March 2018)

<sup>5</sup> Roma Integration Council: <https://www.kul.ee/kultuuriline-mitmekesisus-ja-loimumine/rahvusvahemused-ja-rahvuskaaslased/romade-loimumise-noukoda>

stakeholders on how to improve the inclusion of the Roma in Estonia. The Council has 11 members – nine members from ministries and local governments, and two representatives of the Roma communities. The Council has been described as an important initiative for sharing information and ideas, but it is yet to achieve any practical results, as the Council only meets twice a year and attendance is not high, especially when it comes to the representatives of local governments. The representatives of organisations vary and do not have knowledge of Roma history, culture, discrimination against Roma and other problems they face. There is no strategy or results set for the Council and no documents available for Roma or other interested parties to follow the long-term plans or goals of the Council. The representatives of the Roma communities work on a voluntary basis. The rare meetings, varying participants, and limited time allow only a superficial exchange of information and no comprehensive discussions for better cooperation and actual results. This format should be changed to be more effective in the long term.

In the framework of the ESTROM projects,<sup>6</sup> three meetings have taken place with the representatives of local governments, ministries, and local Roma (Tartu, Valga – 2 July 2018, and Valga – 6 February 2020).

In spring 2022, monthly meetings between the MoC, INSA, and ERFE were taking place for improving communication between all three parties. These meetings were initiated by the ERFE, as it was difficult to follow the tasks of Roma mentors in Valga and the events that were planned for the Roma communities, and there was a need to receive information on the new developments on a regular basis.

#### 1.4. Empowerment of Roma communities at the local level

There are no further initiatives that we are aware of focused on empowering Roma.

#### 1.5. Capacity-building of Roma civil society

The Ministry of Culture started a project called ESTROM, financed by the European Commission in 2017 to support the inclusion of Roma and improve cooperation and dialogue between Roma communities, local municipalities, and state institutions. It was followed by ESTROM 2 from 1 August 2019 to 31 October 2020. ESTROM 3 started in March 2021 and will last for 24 months.

In all three cycles of ESTROM, three training sessions for young Roma activists were provided. This meant covering training fees for already existing training programmes that have been designed for the general public. In 2020, Roma activists asked for a first personalised training from the Estonian Human Rights Centre, which took place on 24 October 2020, because they considered the impact of other training sessions insignificant. In July 2022, the participation of two Roma young persons and two Roma activists was financed in the Baltic Roma Summers School “*Sir Džives, Baltija?*” [How are you, Baltic?] in Vilnius, Lithuania by ESTROM’s activist training budget.

In the scope of the ESTROM project, training programmes for youth and women have focused on strengthening Roma and providing support for capacity building in the Roma communities. Although the ESTROM youth training sessions started already in 2018 (four training sessions) and continued in ESTROM 2 (one training in 2019 and two in 2020, international Roma youth training in Riga, Latvia in 2020), and ESTROM 3, they did not have a significant effect on the skills and capacity of the youth to participate on any level in Roma activism or local initiatives. The participants in subsequent training sessions were not the same, every training focused on youth from different regions and the training sessions were not built on each other to achieve a more comprehensive study cycle. The creation of the content for these training workshops was not discussed with Roma NGOs, they were not involved in the process, although the inclusion of Roma NGOs and activists

<sup>6</sup> <https://www.eestiromad.ee/>

in the creation process could have resulted in more relevant topics and suitable approaches.

The training sessions for women started only during the ESTROM 3 in 2021. Three training workshops are planned to take place in different regions, one in cooperation with the Latvian Roma Platform. The content of sessions has not been planned together with active Roma individuals or NGOs. In two training sessions, local Roma women specialised in the beauty industry provided workshops and coaching for participants.

There is a great need for training programmes aimed at building specific skills for Roma activists to strengthen their position in advocating for Roma. Training session for youth, women, and active Roma should be designed in cooperation with the Roma communities unlike current practices, and aim at specific skills, consider the long-term goals and provide a framework for developing independent projects to support the communities. Funding activities for the Roma communities should be provided. The current trainings are not designed by taking into account the needs of the communities or with the intention of working towards giving agency to Roma.

## 2. RELEVANCE

### 2.1. Fighting antigypsyism and discrimination

According to available information, residential or educational segregation of the Roma communities is not an issue in Estonia. The Roma are dispersed across the country, living among the general Estonian population. Placing Roma children in schools for students with special needs used to be a problem, however no new incidents have been reported in recent years.

Previous Roma Civil Monitor (RCM) reports have stated that the focus of integration policies is on the Russian-speaking Estonian permanent residents, most of whom are citizens of the Russian Federation or persons with undetermined citizenship. The previous guiding document of the national integration policy was '*Integrating Estonia 2020*' and this development plan refers to all individuals with different linguistic and cultural backgrounds in Estonia. It briefly mentioned the Roma specifically – it stated that they need additional attention in the spheres of education, employment, and social affairs.<sup>7</sup> Estonia has not developed a Roma equality, inclusion and participation strategy, however, and there have been no measures implemented by the government that would specifically target the Roma.

There is no information available on discriminatory behaviour by police, misconduct by prosecutors or courts. According to public reports, on two occasions, complaints have been made to the Chancellor of Justice about discriminatory treatment towards two persons of Roma origin during court hearings, but after investigation, no discrimination was confirmed by the Chancellor of Justice.<sup>8</sup>

There has been very limited research performed on the extent of antigypsyism in the Estonian society. A few general surveys indicate that antigypsyism is a problem, but it is difficult to assess its effects. Antigypsyism has not so far been recognised as a separate issue by the state. It is addressed within the general institutional settings for fighting discrimination, meaning the incidents of discrimination can be reported to the Gender Equality and Equal Treatment Commissioner, Chancellor of Justice, or the Labour Dispute Committee. According to experts and reports, nobody has been convicted for discriminating against the Roma in Estonia.

Although incitement to hatred is prohibited by law, it has been a problem to hold the people who incite to hatred accountable for their actions in Estonia. Unfortunately, there aren't any reliable statistics regarding hate speech against the Roma. Similar issues arise concerning hate crimes against the Roma, as the Estonian Penal Code does not include hate crime as a specific type of crime, nor does it include a biased motive as an aggravating circumstance. Although steps have been taken to collect data on hate crimes recently, no hate crimes against the Roma have been recorded.

None of these issues (hate crimes, antigypsyism, or discrimination) is mentioned in the '*Cohesive Estonia Strategy 2030*'. Ethnic, linguistic, and digital/virtual segregation are mentioned and the solutions to this focus on language programmes to increase the level of proficiency of the Estonian language; however, no specific measures concerning how to achieve this are targeted Roma, many of whom do not speak Estonian proficiently.

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<sup>7</sup> Lõimuv Eesti. (2020). *Integrating Estonia 2020*. Direct link is disconnected, document can be accessed at: <https://www.kul.ee/en/news/estonian-government-approved-integration-goals-until-2020>

<sup>8</sup> Chancellor of Justice, *Overview of the Year 2017/2018*: <http://www.oiguskantsler.ee/ylevaade2018/>

## 2.2. Education

As mentioned above, placing Roma children in schools for students with special needs used to be a problem; however, no new incidents have been reported in recent years. Placement of children into special schools has largely decreased in general since inclusive education became the leading principle of the Estonian education system.<sup>9</sup> What follows below is an update of elements from previous RCM reports but none of these items is specifically addressed in the 'Cohesive Estonia Strategy 2030'.

The majority of Roma have reported through the Population Register having either finished up to six years or up to nine years of education. It is not possible to determine how many children of Roma origin are currently in the education system because the Estonian Education Information System (EHIS) only keeps track of children with Romani as their mother tongue, if their parents decide to register them as such. In the academic year 2020/2021, the number of children with Romani as a mother tongue in grades 1-3 (seven to nine years old) was 26, in grades 4-6 (ten to 12 years old) 36, and in grades 7-9 (age 13-15) 20 students.<sup>10</sup> Upon reaching secondary school, most children are registered with Estonian or Russian as their native or primary language. Statistics regarding Roma children currently in secondary education are completely lacking. During the preparation of the 2019 RCM report, interviews uncovered that the main problem in education is related to the school attendance of Roma children, but since then no measures have been taken to combat poor attendance nor are we aware of any further research regarding the reasons why poor attendance seems to be persistent. While Roma children are no longer placed in special schools, they nevertheless often study on either an individual or a simplified curriculum because they have fallen behind due to poor school attendance. There is no targeted support provided for Roma children in schools, but all schools must provide individual support to students who need it. There are no studies available to examine the data regarding how successfully this support is.

There are no statistics available regarding how many children of Roma origin currently attend or have attended preschool. Previous RCM reports interviewed experts and representatives of the Roma communities who brought out that cultural gender roles may be preventing Roma children from accessing preschool education, as it is considered to be the mother's responsibility to stay home with children.<sup>11</sup> Since then, however, there has been no effort to overcome these preconceptions with any sort of awareness campaign to explain the benefits of preschool or to address the concerns of Roma parents regarding the assimilating influence of preschool.<sup>12</sup>

In Estonia, a minor is obligated to attend school until the age of 17 or until finishing basic school. According to the National Population Register, the majority of people who self-identify as Roma have reported that they have either only finished up to six years of education (155 people) or up to nine years of education (204 people).

There are no Romani language textbooks used in schools. Creating a Romani textbook has been discussed by the Ministry of Education, but Roma communities have been wary about sharing their language and transforming it from an oral culture into a written one. There

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<sup>9</sup> See more on the webpage of the Ministry of Education and Research at: <https://www.hm.ee/et/hariduslike-erivajadustega-opilaste-toetamine-oppekorraldus-ja-tuugiteenused>

<sup>10</sup> E-mail from the Estonian Population Register (30 September 2021).

<sup>11</sup> Interview with Viivian Jõemets, Chief Expert of the General Education Department of the Ministry of Education and Research, 12 November 2018; Interview with Mall Saul, Chief Specialist of the Cultural Diversity Department of the Ministry of Culture, 25 October 2018.

<sup>12</sup> Report '*Eesti roma (mustlaste) elanikkonna olukord ja lõimumise vajadus*' [The situation and the Need for Integration of the Estonian Roma Community], 2013, p 53. Available at: [https://www.eestiromad.ee/wp-content/uploads/2020/10/roma\\_uuring\\_perekeskus\\_2013.pdf](https://www.eestiromad.ee/wp-content/uploads/2020/10/roma_uuring_perekeskus_2013.pdf)

have been no direct initiatives or funding options available for creating any materials for teaching Romani or Roma culture to children. The Ministry of Education has been funding Romani minority schools (*Tallinna Roma Kultuurikeskus/Tallinn Roma Cultural Centre*) since September 2020 for home language and culture teaching as part of the programme for minority's Sunday schools for language and culture. The Tallinn Roma Cultural Centre provides annually 100 academic hours of teaching to ten children of Estonian, Latvian, and Russian Roma origin and is led by the parents of these children without any professional education and support for teaching. The annual budget of 5,250 EUR is not sufficient for developing teaching materials or providing professional education to teachers.

In 2018, the MoC started a project in which one of the aims was to identify 20 young Roma who are interested in becoming the local spokespersons of the Roma communities, supporters of the education of Roma children, and cultural translators between schools, local governments, and the Roma families.<sup>13</sup> This could help to increase trust and reduce misunderstandings between schools and the Roma communities. These youth training sessions continued to be organised within the scope of the ESTROM projects, but participants have not been the same in subsequent training sessions and focused on personal skills without bringing them to the level that would be required for becoming a mediator. Thus far there is no evidence that participants in these training sessions were given the position of a mediator or been involved in government-led projects. The interviewed representatives of the Roma communities suggested that it would be helpful to have a Roma support centre where volunteers from the Roma communities could help out other members of the communities, including with schoolwork for students who are falling behind in school.<sup>14</sup> The Integration Foundation has planned to open a family centre for Roma in Valga, but it was delayed due to problems finding a good location. There is no further information available on the planning of the centre or how it is designed to function.

Following graduation from basic school (nine years), students have the option to go for general secondary education (three years) or vocational education. Secondary education is not compulsory. There is no data available regarding how many Roma students are currently enrolled in secondary or vocational education. When Roma students reach that level, they often no longer register as students with Romani mother tongue in the EHIS.<sup>15</sup> There are also no statistics regarding Roma students in higher education, but according to the interviewed experts, there is no knowledge on students of Roma origin who reached higher education, and in case they do, they would already be distanced from the Roma communities.<sup>16</sup> In the study that was conducted among Roma youth in 2014, most of the respondents had not given higher education any thought because they did not think it would give them a serious advantage – university was considered too time-consuming, with no guarantee of employment afterwards. Only one respondent was planning to go to university.<sup>17</sup>

To support the educational path of Roma children and increase their participation in public services, the MoC launched a Roma mediating service in the Valga municipality in 2020,

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<sup>13</sup> See more at: [https://www.kul.rik.ee/sites/kulminn/files/1.12.2018\\_protokoll.pdf](https://www.kul.rik.ee/sites/kulminn/files/1.12.2018_protokoll.pdf)

<sup>14</sup> Interview with Zalina Dabla and Farida Tšimbota, Representatives of the European Roma Forum in Estonia, 10 February 2019

<sup>15</sup> Interview with Viivian Jõemets, Chief Expert of the General Education Department of the Ministry of Education and Research, 12 November 2018

<sup>16</sup> Interview with Viivian Jõemets, Chief Expert of the General Education Department of the Ministry of Education and Research, 12 November 2018; Interview with Mall Saul, Chief Specialist of the Cultural Diversity Department of the Ministry of Culture, 25 October 2018

<sup>17</sup> Civitta Eesti AS. (2014). *Roma rahvusest noorte olukord Eesti Vabariigis: haridus ja töökeskkond* [The Situation of Roma Youth in Estonia: Education and Employment], pp. 7-8: <https://www.eestiromad.ee/wp-content/uploads/2020/10/uuring-tturoma-noored-2014.pdf>

where about a third of the Estonian Roma live. The service is coordinated by the INSA.<sup>18</sup> At the current time, we do not have any expected way to measure the results of this effort or what this mediation service is expected to perform in the coming years to be able to evaluate its effectiveness and success. In addition to this mediation programme which is welcomed by Roma, since one of the reasons Roma students do not continue to secondary or higher education is that they believe that Estonian education threatens their culture,<sup>19</sup> the Ministry of Education has considered organising study visits to Finland to demonstrate through the Finnish Roma communities that education and Roma culture are not mutually exclusive.<sup>20</sup> These plans have not come into action and there were no follow-up discussions on any study visits or sharing of experiences.

There have been a few training sessions (including 2018, 2019, 2022) for teachers and other school support personnel organised by the ESTROM projects. These trainings reached around 30 participants at a time and there is no other structure to support the teachers consistently. Few Roma have taken part in the event or participated in the discussions. In 2019, a Latvian Roma mentor shared her experience working with schools, Roma families, and children. In a 2022 teachers' training, for the first time, a representative of the Roma communities and the ERFE were asked to give a presentation about Roma communities and the perspective of Roma families. The training of teachers has been limited to one-day training sessions without follow-up events and without the presentation of successful cases from Estonia that could provide examples of good practices for other educational institutions and teachers.

There have been no large-scale surveys regarding the discrimination or bullying of Roma students in school; isolated incidents have occurred, but were insufficient to make any wider generalisations.<sup>21</sup> The interviewed members of the Roma communities explained that bullying might not always be directly caused by the Roma origin of the children, but sometimes, due to many Roma children coming from poor backgrounds, that is reflected in their appearance. They confirmed that bullying can play a large role in making school a place where Roma children do not feel included.<sup>22</sup> In the Roma youth study, most respondents confirmed that bullying does occur, but not all of them thought it was because of their ethnicity. The respondents also noted that the level of tolerance depends on the specific school.<sup>23</sup>

Over 70 schools in Estonia are involved in the research-based antibullying programme called 'KiVa', which was developed by the University of Turku, Finland.<sup>24</sup> However, there are no programmes that would have a specific focus on antigypsyism – which may be due to the number of Roma students being low and there is no reliable data available that would lead authorities to recognise antigypsyism as a problem in education.

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<sup>18</sup> Cohesive Estonia: Integration, Incl. Adaptation Programme 2022-2025, p. 11.

<sup>19</sup> Interview with Viivian Jõemets, Chief Expert of the General Education Department of the Ministry of Education and Research, 12 November 2018; Interview with Mall Saul, Chief Specialist of the Cultural Diversity Department of the Ministry of Culture, 25 October 2018

<sup>20</sup> Interview with Viivian Jõemets, Chief Expert of the General Education Department of the Ministry of Education and Research, 12 November 2018

<sup>21</sup> *Ibid.*

<sup>22</sup> Interview with Zalina Dabla and Farida Tšimbota, Representatives of the European Roma Forum in Estonia, 10 February 2019

<sup>23</sup> Civitta Eesti AS,. (2014). *Roma rahvusest noorte olukord Eesti Vabariigis: haridus ja töökeskkond* [The Situation of Roma youth in Estonia: Education and Employment]: <https://www.eestiromad.ee/wp-content/uploads/2020/10/uuring-tturoma-noored-2014.pdf>

<sup>24</sup> More information about the programme is available at: <https://www.armastanaidata.ee/en/donation/education/kiusamivaba-kool-help-prevent-bullying-in-more-schools>, or on the programme's official website: <http://kiusamivaba.ee>

## 2.3. Employment

'The Cohesive Estonia Strategy 2030' observes that overall employment outcomes for non-Estonian speakers are less favourable. To solve this, it proposes to create jobs where the Estonian language is not required, as well as a variety of measures that offer accessible and improved Estonian language training for those who have a different mother tongue. Although these programmes primarily target native Russian speakers who have been present on the territory for a substantial period of time, they also target recent immigrants. There are no specific outreach efforts mentioned that would help these measures to reach the Romani communities who could benefit from these programmes. Roma are mentioned once in the plan in relation to employment as a group that needs help to achieve improved outcomes but there is no specific measure mentioned that would help achieve this result.

According to the Estonian Population Register, 72 people out of 649 people who identify as Roma are employed.<sup>25</sup> No labour market services specifically target the Roma communities, but they have access to the same services as all other Estonian residents. An earlier small-scale study reflects that young Roma are aware of state services and training programmes offered to jobseekers, but they do not provide a guarantee in successfully finding permanent employment after and therefore, are not perceived as attractive.<sup>26</sup> The study also found that prejudices about the Roma and lack of education among the Roma are factors that hinder access to employment. There are no official reports of incidents of work-related discrimination or specific measures to fight antigypsyism in employment. Incidents of discrimination can be reported to the Labour Inspectorate, the Chancellor of Justice, and the Office of the Gender Equality and Equal Treatment Commissioner.

Measures for residents who are not Estonian native speakers include offering Estonian language training and providing labour market services in Russian, which could theoretically be partly beneficial to the Roma communities, as approximately 15% of the Roma in Estonia consider their mother tongue to be Russian.<sup>27</sup> The Unemployment Insurance Fund has justified not having targeted measures for Roma with the fact the labour market services are already provided according to the needs of the individual.<sup>28</sup> The Fund implements an individual approach, regardless of the nationality or language skills of the beneficiary, identifying the needs of the specific unemployed person and their prospects in the labour market.<sup>29</sup>

There are, however, specific measures for young people. As part of the 'My First Job' Programme dedicated to young people with little work experience, the Unemployment Insurance Fund grants a wage subsidy to the employer and compensates training costs for the hired young person (aged 16-29).<sup>30</sup> The scheme for young people could potentially benefit Roma youth as well; however, the services of the Unemployment Insurance Fund often do not reach Roma communities. According to the interviewed representatives of the Roma communities, they are reluctant to turn to the Unemployment Insurance Fund for

<sup>25</sup> Statistics from the Estonian National Population Register (dated 1 January 2018)

<sup>26</sup> Civitta Eesti AS. (2014). *Roma rahvusest noorte olukord Eesti Vabariigis: haridus ja töökeskkond* [The Situation of Roma Youth in Estonia: Education and Employment].

<sup>27</sup> Statistics from the Estonian National Population Register (dated 1 January 2018).

<sup>28</sup> E-mail from the Valga Municipality Office of the Unemployment Insurance Fund (07 December 2018).

<sup>29</sup> *Lõimuv Eesti*. (2020). [Integrating Estonia 2020], p. 10. Online link is disconnected. Final report in the plan is available at: <https://www.kul.ee/en/news/final-report-integration-plan-society-more-cohesive-and-tolerant-and-sense-national-identity#:~:text=The%20overall%20goal%20of%20the,share%20the%20same%20democratic%20values>.

<sup>30</sup> Estonian Unemployment Insurance Fund, *My First Job*: <https://www.tootukassa.ee/en/services/employers/my-first-job>

assistance because they either consider it pointless, or they are afraid of the bureaucracy and discriminatory attitudes. Given this situation, the Roma communities might benefit from a support centre created specifically for the Roma, run by representatives of the Roma communities, who can provide guidance and assistance in all different areas of life, such as employment and education.<sup>31</sup>

## 2.4. Healthcare

According to a report from 2018, the share of people in Estonia not covered by health insurance is around 6%.<sup>32</sup> According to the statistics of the Estonian Health Insurance Fund, on 1 January 2019 23.4% of Roma were not covered by health insurance.<sup>33</sup> There are no statistics available regarding how many Roma are covered, but from the interview with representatives of the Roma communities, it can be concluded that lack of health insurance is indeed experienced by many. Further research is required to determine the scale of the problem. The interviewed representatives of the Roma communities explained that the lack of health insurance is caused by the high unemployment rate and reluctance to register with the Unemployment Insurance Fund, even though all unemployed people are covered by health insurance (if they are registered). This reluctance can be explained by fear of bureaucracy or discrimination.<sup>34</sup>

There is also no information available regarding discrimination or antigypsyism in health care. The interviewed representatives of the Roma communities confirmed that they have heard about cases of discriminatory attitudes from family physicians; however, it is impossible to assess how systematic this is without wider research.

## 2.5. Housing, essential services, and environmental justice

There are no Roma settlements in Estonia. The Roma in Estonia are stationary and live in regular housing – sometimes in social housing, due to difficulties in finding suitable and affordable rental apartments. Those difficulties can be attributed to the overall state of the rental market as well as prejudice against the Roma.

The provision of social housing is organised by the local government, who determines its own rules for applying for social housing. Homelessness has not been reported as a problem, but there have been reports of poor living conditions from representatives of the Roma communities.<sup>35</sup> No large-scale research has been conducted on this topic that could provide a more generalised picture of the situation.

## 2.6. Social protection

Nothing to report (no information available – the national strategy Cohesive Estonia 2030 does not cover this area and no related research reports were available to the authors).

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<sup>31</sup> Interview with Zalina Dabla ja Farida Tšimbota, Representatives of the European Roma Forum in Estonia, 10 February 2019.

<sup>32</sup> European Social Policy Network. (2018). *Thematic Report on Inequalities in Access to Healthcare in Estonia*: <https://ec.europa.eu/social/BlobServlet?docId=20368&langId=en>

<sup>33</sup> Presentation of Mall Saul from the Ministry of Culture on supporting the integration of Roma in Estonia (*Romade lõimumise toetamine Eestis*) at the RomFest seminar 15 August 2020

<sup>34</sup> Interview with Zalina Dabla ja Farida Tšimbota, Representatives of the European Roma Forum in Estonia, 10 February 2019.

<sup>35</sup> Ibid.

## 2.7. Social services

Nothing to report (no information available – the national strategy Cohesive Estonia 2030 does not cover this area and no related research reports were available to the authors).

## 2.8. Child protection

Nothing to report (no information available – the national strategy Cohesive Estonia 2030 does not cover this area and no related research reports were available to the authors).

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

In the Cohesive Estonia's 'Integration, Incl. Adaptation Programme 2022-2025', there are mentions of supporting the participation of Roma in public services, the formation and capacity of Roma civil society organisations and the introduction of Roma culture and history to the Estonian population. It mentions that, by introducing Roma culture and history, the prejudices and negative stereotypes about the Roma that are widespread can be reduced. It also goes on to say that the MoC will continue to develop a network in support of Roma inclusion and to strengthen the Roma civil society, so that the introduction of Roma culture and history continues. How this will be done, with what budget and how the success of such actions will be measured is not mentioned, nor are any specific actions mentioned for the near future.

The main measure in use until now has been the financial support from the ESTROM projects for the ROMFEST Music and Culture Festival in 2020, 2021, and 2022, as well as for some annual Roma Holocaust Commemoration Day events. The Roma Holocaust commemoration events do not include many participants from the state or official research institutions. There is a need to dedicate higher visibility and more promotion to the Roma Holocaust Commemoration Day on 2 August, which has not been officially recognised by Estonia yet.

In 2021, ESTROM financed the creation of a small booklet about Roma in Estonian, English and Russian titled "*Romad Eestis/Roma in Estonia/Ромы в Эстонии*" (MTÜ Euroopa Romade Foorum Eestis, Anette Ross, Zalina Dabla, Eva-Liisa Roht-Yilmaz).

In the 2021/2022 academic year, the Estonian Integration Foundation financed Roma dance classes during several weekends for children and teenagers, including their costumes. Thanks to the financing, Roma children and teenagers could perform at the Valga City Festival in 2022 and ROMFEST-Est 2022 Roma Festival in Tallinn. These activities rely on unstable funding for dance teachers from Tallinn and there are no long-term plans for having local dance teachers or a dedicated budget for the activities.

## 3. EXPECTED EFFECTIVENESS

### 3.1. Coherence with related domestic and European policies

The 'Cohesive Estonia Strategy 2030' is not a strategy on Roma equality inclusion and participation, nor is it aligned with the new European Roma Strategic Framework.

According to an interview with the representative of the Integration Foundation, the Roma do not constitute a large enough portion of the population to deserve a separate national strategy and they are sufficiently included as part of the target audience of the 'Cohesive Estonia Strategy 2030'. At the same time, the Integration Foundation has not conducted any research in the past five years that has targeted the needs of the Roma and is unaware of any specific needs that might exist within the Roma communities. The Integration Foundation is a permanent member of the Board of the Roma Integration Council, and it is via this relationship that the Integration Foundation is in contact with Roma NGOs.

This position is equally supported by the Ministry of Social Affairs, which states that it is through the Integration Foundation via the 'Cohesive Estonia Strategy 2030' that the objectives of the European Commission will be achieved. This ministry is also on the Board of the Roma Integration Council and functions in the same way when it comes to its interactions with the Roma communities; it is also unaware of any studies or surveys which may have influenced the decisions leading to the development of the 'Cohesive Estonia Strategy 2030'.

### 3.2. Responsibility for NRSF coordination and monitoring

Furthermore, both the Ministry of Social Affairs and the Integration Foundation confirm that the main focus of the government on the Roma is via the MoC, which is responsible for the creation of the Roma Integration Council. Various councils at the MoC serve in an advisory function, however, neither the Roma Integration Council nor the Ministry of Social Affairs appears to have taken advantage of consulting these advisory councils under the MoC to encourage Roma participation in the drafting of the 'Cohesive Estonia Strategy 2030'.

### 3.3. Quality of the plan

This strategy is lacking sufficient measures related to achieving specific goals, as well as actions that would ensure reaching the target audiences with these messages, as far as Roma are concerned. Roma are mentioned four times in the document: with respect to increasing awareness, empowerment, engagement, mentoring, and the labour market as general statements without any details regarding how to achieve such potential goals.

### 3.4. Funding, monitoring and evaluation

As the goals and measures related to Roma inclusion remain extremely vague in the national plan, it is impossible to raise pertinent questions regarding the funding or the feasibility of the projects. The same can be said with respect to any potential monitoring and evaluation.

### 3.5. Assessment of the expected effectiveness and sustainability

At this point, there can be no expectation of effectiveness or sustainability without further commitment to stating measurable goals.

## 4. ALIGNMENT WITH THE EU ROMA STRATEGIC FRAMEWORK

### 4.1. Reflecting diversity among Roma

The 'Cohesive Estonia Strategy 2030' does not recognise any diversity among Roma.

Most of the Roma in Estonia state that their native language is the Romani language (65%).<sup>36</sup> Linguistically, the Roma in Estonia can be divided into the Latvian and Russian dialect groups, similar to Latvia. The larger part of Roma population in Estonia speaks Latvian Romani. The Roma mostly identify themselves as Latvian, Russian or Estonian Roma.<sup>37</sup> Usually, it is the Latvian Roma who have lived in Estonia for several generations and have started to identify themselves as Estonian Roma; 15% consider that their native language is Russian and 10% consider it to be Estonian.<sup>38</sup>

Given the linguistic diversity of Roma and the linguistic focus of the 'Cohesive Estonia Strategy 2030', it would be worth taking language into consideration in order to obtain maximum reach for the language training offered in the integration plan.

### 4.2. Combining mainstream and targeted approaches

Interviews with government officials indicate no targeted approaches were used and were even discouraged from being considered given the small number of Roma in Estonia. It seems that a targeted approach addressing the needs of the communities may provide a way of bridging the misunderstandings and lack of awareness of the rights of Roma citizens, especially with respect to health care insurance coverage for unemployed people and other bureaucratic procedures.

### 4.3. Usage of instruments introduced by the Council Recommendation

Currently, the 'Cohesive Estonia Strategy 2030' is not aligned with the EU Roma Strategic Framework and the Council Recommendations of Roma Equality, Inclusion and Participation..

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<sup>36</sup> E-mail from the Estonian Population Register (6 March 2018).

<sup>37</sup> Interview with Ms Saul, from the Ministry of Culture, Chief Specialist of Cultural Diversity Department.

<sup>38</sup> E-mail from the Estonian Population Register (6 March 2018).

## CONCLUSIONS AND RECOMMENDATIONS

There is no dedicated strategy or at least a well-defined set of mainstream measures with relevance for Roma equality, inclusion and participation in Estonia. The 'Cohesive Estonia Strategy 2030' mentions Roma four times as an afterthought with no serious measures for achieving meaningful outcomes. Those outcomes remain vaguely defined, insufficient, and inconsistent. The measures proposed do not reflect the guidelines proposed in either the Council Recommendations or the EU Roma Strategic Framework. Weaknesses lie particularly in the fact that no research was done to analyse and evaluate the situation of Roma and that the Roma communities and CSOs were not involved in the drafting process from the beginning. Only in an addendum to the strategy are any aspects of Roma history and culture addressed. Finally, in the absence of a dedicated budget, the Estonian strategy remains a declarative document.

### *Recommendations to national authorities*

1. Develop a national strategic framework so that the treatment of Roma across all ministries and government bodies is consistent, congruent, fair, and leaves no one behind due to linguistic or other factors, especially in instances where mainstream approaches have been decided but have clearly delivered disparate results.
2. Roma equality, inclusion, and participation, both cultural and general, are currently dealt with and led by the Ministry of Culture. It would be more effective if this topic was managed transversally in each ministry by a department or a person who is aware of the specific issues faced by Roma (the Ministry of Social Affairs, the Ministry of Education, the Ministry of the Interior). This approach would also be effective in fighting against antigypsyism and discrimination.
3. Involve Roma representatives in the planning process of the national strategy.
  - a. Implement a bottom-up approach in addition to the current top-down planning approach, in order to obtain meaningful participation of the Roma communities in the planning processes.
  - b. Representatives of Roma organisations have emphasised the importance of offering Roma communities the opportunity to contribute to the planning and preparation of any measures that are meant to benefit the communities. This requires better capacity both within the state institutions and the Roma communities, including better understanding and more time for preparation. Funds could be allocated for Roma communities' inclusion in the planning stage of the projects, and various interactive and participatory tools could be used to facilitate idea generation and validation of planned measures.
4. Develop and implement capacity building measures for Roma civil society as part of the plan.
  - a. Strategy for empowering Roma civil society – There is a need for a more strategic approach to empowering the Roma civil society, either by developing a specific strategy or highlighting the Roma as a specific target group in the existing framework for civil society development. Here, cooperation among state institutions is key: since policymaking is divided between the Ministry of Interior and the Ministry of Culture, it is important to establish a clear division of responsibilities, including an overarching coordination role. Moreover, the development of the [Civil Society Development Concept](#) (EKAK) should pay more attention to the meaningful inclusion of minority groups such as the Roma. This requires a substantial shift in understanding what inclusive strategy development practically means and the use of new formats.

- b. Targeted support for existing Roma organisations - Roma organisations have expressed the need for targeted long-term support that would include step-by-step planning of the work of an NGO, project writing and reporting. The [National Foundation of Civil Society](#) (KÜSK) could think about further ways to conduct application rounds for less empowered organisations. There could be simplified reporting processes for smaller grants or lump-sum payments for reaching specific targets without the need for a financial report. More efforts should be made to reach the communities, such as visiting locations or sending out personalised invitations to information sessions, as well as follow-up via channels that are used by the Roma. The counsellors of the National Foundation of Civil Society County Development Centres should be trained to reach out to the communities who are not so empowered and provide targeted support to Roma organisations in counties with a larger Roma population.
  - c. In addition, the Integration Foundation could expand its support to organisations that are willing and able to do advocacy work rather than only focusing on cultural activities.
  - d. Annually allocate funds to the Ministry of Culture for the purpose of empowering and building the capacities of the Roma communities. The state should allocate funds to support activities focused on Roma equality, inclusion, and participation on an annual basis in order to approach the issue strategically.
  - e. Create a state-wide Roma communities development and activity plan that could be followed by municipalities at the local level.
  - f. Local governments should strategically support the Roma communities on the local level. At present, local governments do not provide any support to the Roma communities separately. However, they know the people living in their communities better than anyone else and could help and support them directly.
5. Continue and expand work with mediators to improve school attendance and overall educational outcomes.
6. Provide teachers with additional specific training for working with Roma students:
  - a. Currently, the provided training sessions are mainly focused on newly arrived immigrants.
  - b. The cultural differences of the Roma communities make it necessary to also train teachers that work with Roma children.
7. Work with mediators to encourage registration for unemployment benefits and training programmes, to ensure health insurance coverage, improvements in Estonian language comprehension and mastery, and reinforce mainstream measures so that they reach all citizens/residents equally.
8. Assess the needs of the Roma in employment systematically and develop a strategy for addressing their needs. The current policy of treating the Roma as any other cultural minority leads to their specific needs and challenges being overlooked. The needs of the Roma communities should be assessed separately, and they should be included as a specific target group in any relevant development plans and strategies. This can be done while maintaining a mainstream approach.
9. Statements regarding the promotion of Roma arts, history, culture, and the awareness of negative stereotypes due to antigypsyism mentioned in the addendum to the strategy ('Cohesive Estonia: Integration, Incl. Adaptation

Programme 2022-2025') should be followed through with specific action items, budgets, timelines, and measures for success.

***Recommendations to European institutions***

10. Demand from Estonia a dedicated National Roma Strategic Framework (NRSF) with measurable outcomes that respond to the current needs of the Roma population based on recently documented studies with demonstrable Roma participation.

***Recommendations to the civil society***

11. Continue to be persistent with demands; follow up and document unaddressed issues over time.

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- Ave Härsing, Integration Foundation, written interview, 7 June 2022;
- European Roma Forum in Estonia (ERFE) NGO members;
- Eva-Liisa Roht-Yilmaz, PhD researcher in Romani Ethnology, advised and provided comments to the draft of this report;
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- Mall Saul, Ministry of Culture, National Roma Contact Point (NRCP), written interview, 29 June 2022;
- Ministry of Education;
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## ANNEX: LIST OF PROBLEMS AND CONDITIONS

### *Fighting antigypsyism and discrimination*

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
Antigypsyism not recognised as a specific problem in national policy frameworks	critical problems	Irrelevant	Absent	Absent
Prejudice against Roma	Significant problems	Irrelevant	Absent	Absent
Hate crimes against Roma	Significant problems	Irrelevant	Absent	Absent
Hate speech towards and against Roma (online and offline)	Irrelevant	Irrelevant	Absent	Absent
Weak effectiveness of protection from discrimination	Minor	Irrelevant	Absent	Absent
Segregation in education, housing, or provision of public services	minor	Irrelevant	Absent	Absent
Forced evictions and demolitions leading to homelessness, inadequate housing, and social exclusion	minor	Irrelevant	Absent	Absent
Statelessness, missing ID documents	Irrelevant	Irrelevant	Absent	Absent
Misconduct and discriminatory behaviour by police (under-policing/under-policing)	Irrelevant	Irrelevant	Absent	Absent
Barriers to <i>de facto</i> exercise of EU right to	irrelevant	Irrelevant	Absent	Absent

free movement				
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### Education

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified strategy: by</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
Lack of available and accessible pre-school education and ECEC services for Roma	Significant	Irrelevant	Absent	Absent
Lower quality of pre-school education and ECEC services for Roma	Significant	Irrelevant	Absent	Absent
High drop-out rate before completion of primary education	Significant	Irrelevant	Absent	Absent
Early leaving from secondary education	Significant	Irrelevant	Absent	Absent
Secondary education/vocational training disconnected from labour market needs	Significant	Mentioned but not analysed sufficiently	Absent	Absent
Misplacement of Roma pupils into special education	Irrelevant	Irrelevant	Absent	Absent
Education segregation of Roma pupils	Significant	Mentioned but not analysed	ABSENT	ABSENT
Increased selectivity of the educational system resulting in concentration of Roma or other disadvantaged pupils in educational facilities of lower quality	Significant	Mentioned but not analysed	Absent	Absent
Limited access to second-chance education, adult education, and lifelong learning	Significant	mentioned	Present but insufficient	Present but insufficient

Limited access to and support for online and distance learning if education and training institutions close, as occurred during the coronavirus pandemic	Irrelevant	Irrelevant	Absent	Absent
Low level of digital skills and competences and limited opportunities for their development among pupils	Minor	Mentioned but not analysed	Absent	Absent
Low level of digital skills and competences and limited opportunities for their development among adults	Minor	Mentioned but not analysed	Absent	Absent

### Employment

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
Poor access to or low effectiveness of public employment services	Significant problems	Mentioned but not analysed	Absent	Absent
Youth not in employment, education or training (NEET)	Irrelevant	Irrelevant	Absent	Absent
Poor access to (re-) training, lifelong learning and skills development	Significant problems	Mentioned but not analysed	Absent	Absent
Discrimination on the labour market by employers	Minor	Irrelevant	Absent	Absent
Risk for Roma women and girls from disadvantaged areas of being subjected to trafficking and forced prostitution	Irrelevant	Irrelevant	Absent	Absent
Primary labour market opportunities substituted by public	Irrelevant	Irrelevant	Absent	Absent

work				
Barriers and disincentives to employment (such as indebtedness, low income from work compared to social income)	Irrelevant	Irrelevant	Absent	Absent
Lack of activation measures, employment support	Minor	Mentioned but not analysed	Absent	Absent

### Healthcare

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified strategy:</b>	<b>by</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
Exclusion from public health insurance coverage (including those who are stateless, third country nationals, or EU-mobile)	Significant	Irrelevant		Absent	absent
Poor supply/availability of healthcare services (including lack of means to cover out-of-pocket health costs)	Irrelevant	Irrelevant		Absent	Absent
Limited access to emergency care	Irrelevant	Irrelevant		Absent	Absent
Limited access to primary care	Irrelevant	Irrelevant		Absent	Absent
Limited access to prenatal and postnatal care	Irrelevant	Irrelevant		Absent	Absent
Limited access to health-related information	Irrelevant	Irrelevant		Absent	Absent
Poor access to preventive care (vaccination, check-ups, screenings, awareness-raising about healthy)	Irrelevant	Irrelevant		Absent	Absent

lifestyles)				
Poor access to sexual/reproductive healthcare and family planning services	Irrelevant	Irrelevant	Absent	Absent
Specific barriers to better healthcare of vulnerable groups such as elderly Roma people, Roma with disabilities, LGBTI and others	Irrelevant	Irrelevant	Absent	Absent
Discrimination/antigypsyism in healthcare (e.g., segregated services, forced sterilisation)	Irrelevant	Irrelevant	Absent	Absent
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	Irrelevant	Irrelevant	Absent	Absent

*Housing, essential services, and environmental justice*

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified strategy:</b>	<b>by</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
Poor physical security of housing (ruined or slum housing)	Irrelevant	Irrelevant		Absent	Absent
Lack of access to drinking water	Irrelevant	Irrelevant		Absent	Absent
Lack of access to sanitation	Irrelevant	Irrelevant		Absent	Absent
Lack of access to electricity	Irrelevant	Irrelevant		Absent	Absent
Limited or absent	Irrelevant	Irrelevant		Absent	Absent

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

Limited or lacking access to green spaces	Irrelevant	Irrelevant	Absent	Absent
Roma excluded from environmental democracy	Irrelevant	Irrelevant	Absent	Absent

*Social protection*

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
High at-risk-of-poverty rate and material and social deprivation	Irrelevant	Irrelevant	Absent	Absent
Income support programmes fail to guarantee an acceptable level of minimum income for every household	Irrelevant	Irrelevant	Absent	Absent
Limited access to income support schemes (low awareness, barrier of administrative burdens, stigma attached)	Irrelevant	Irrelevant	Absent	Absent
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	Irrelevant	Irrelevant	Absent	Absent
Discrimination by agencies managing income-support programmes	Irrelevant	Irrelevant	Absent	Absent
Risk of municipalities misusing income support to buy votes	Irrelevant	Irrelevant	Absent	Absent

### Social services

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified strategy:</b>	<b>by</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
Limited quality, capacity and comprehensiveness of help provided by social services	Irrelevant	Irrelevant		Absent	Absent
Limited access to social services: low awareness of them, low accessibility, (e.g., due to travel costs) or limited availability	Irrelevant	Irrelevant		Absent	Absent
Services providers do not actively reach out to those in need	Irrelevant	Irrelevant		Absent	Absent
Limited ability of social services to effectively work together with other agencies (e.g., public employment service) to help clients	Irrelevant	Irrelevant		Absent	Absent
Discrimination by social service providers	Irrelevant	Irrelevant		Absent	Absent
Lack of adequacy of programmes for addressing indebtedness (providing counselling and financial support)	Irrelevant	Irrelevant		Absent	Absent

### Child protection

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified strategy:</b>	<b>by</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
Child protection not considered in the NRSF	Irrelevant	Irrelevant		Absent	Absent
Specific vulnerability of Romani children as victims of violence not considered	Irrelevant	Irrelevant		Absent	Absent

Segregated or discriminatory child-protection services provided to Roma	Irrelevant	Irrelevant	Absent	Absent
Activities aimed at strengthening parental responsibility and skills not available or not reaching out to Roma parents	Irrelevant	Irrelevant	Absent	Absent
Illegal practices of child labour	Irrelevant	Irrelevant	Absent	Absent
Large-scale and discriminatory placement of Romani children in early childhood care institutions	Irrelevant	Irrelevant	Absent	Absent
Persistence of large-scale institutions rather than family-type arrangements	Irrelevant	Irrelevant	Absent	Absent
Early marriages	Irrelevant	Irrelevant	Absent	Absent
Barriers to children's registration; statelessness	Irrelevant	Irrelevant	Absent	Absent
Biased treatment of Roma youth by security and law enforcement	Irrelevant	Irrelevant	Absent	Absent
Inadequate child/ adolescent participation	Irrelevant	Irrelevant	Absent	Absent

*Promoting (awareness of) Roma arts, culture, and history*

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified strategy:</b>	<b>by</b>	<b>Measures to address:</b>	<b>to</b>	<b>Targets defined:</b>
Poor or lacking awareness of the general population of the contribution of Roma art and culture to national and European heritage	Irrelevant	Irrelevant		Absent		Absent

Exclusion of Roma communities from national cultural narratives	Irrelevant	Irrelevant	Absent	Absent
Romani history and culture not included in school curricula and textbooks for both Roma and non-Roma students	minor	Mentioned but not analysed sufficiently	Absent	Absent
Lack of inclusion of Romani language in schools, and development of necessary educational materials and resources for Romani language preservation and teaching	Irrelevant	Irrelevant	Absent	Absent
Lack of memorialization of Roma history through establishing monuments, commemorative activities, and institutionalizing dates relevant to Roma history	Irrelevant	Irrelevant	Absent	Absent

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