



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

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CONTENTS

LIST OF ABBREVIATIONS	5
EXECUTIVE SUMMARY	6
INTRODUCTION	8
1. PARTICIPATION	10
1.1. Roma participation in the NRSF preparation	10
1.2. Roma participation in the NRSF implementation, monitoring, and evaluation	10
1.3. System of policy consultation with civil society and stakeholders	11
1.4. Empowerment of Roma communities at the local level.....	11
1.5. Capacity-building of Roma civil society	12
2. RELEVANCE	13
2.1. Fighting antigypsyism and discrimination.....	13
2.2. Education	14
2.3. Employment	15
2.4. Healthcare.....	17
2.5. Housing, essential services, and environmental justice	18
2.6. Social protection.....	20
2.7. Social services	20
2.8. Child protection	21
2.9. Promoting (awareness of) Roma arts, culture, and history	22
3. EXPECTED EFFECTIVENESS	24
3.1. Coherence with related domestic and European policies.....	24
3.2. Responsibility for NRSF coordination and monitoring	24
3.3. Quality of the plan	24
3.4. Funding	25
3.5. Monitoring and evaluation.....	25
3.6. Assessment of the expected effectiveness and sustainability	26
4. ALIGNMENT WITH THE EU ROMA STRATEGIC FRAMEWORK	28
4.1. Reflecting diversity among Roma.....	28
4.2. Combining mainstream and targeted approaches.....	29
4.3. Usage of instruments introduced by the Council Recommendation	29
CONCLUSIONS AND RECOMMENDATIONS	31
REFERENCES	33
ANNEX: LIST OF PROBLEMS AND CONDITIONS	36

LIST OF ABBREVIATIONS

CNR	National Research Council
DG Just	European Commission's Directorate-General Justice and Consumers
DI/CEU	Democracy Institute of Central European University
ERGO Network	European Roma Grassroots Organisations Network
ERRC	European Roma Rights Centre
EU	European Union
FSG	Fundación Secretariado Gitano
INMP	National Institute for Health, Migration and Poverty
ISTAT	National Institute of Statistics
M&E	Monitoring and Evaluation Unit
NEET	Not in Education, Employment or Training
NGO	Non-Governmental Organisation
NHS	National Health Service
NRIS	National Strategy for the Inclusion of Roma, Sinti, and Caminanti 2012-2020
NRSF	National Strategy for Roma and Sinti Equality, Inclusion, and Participation 2021-2030
PON	National Operational Programme
RSC	Roma, Sinti, and Caminanti
UNAR	National Anti-Racial Discrimination Office
UNHCR	United Nations High Commissioner for Refugees

EXECUTIVE SUMMARY

The '*National Strategy for Roma and Sinti Equality, Inclusion, and Participation 2021-2030*' (NRSF) refers in its title explicitly to the '*Council Recommendation for Roma Equality, Inclusion, and Participation*' and represents the follow-up to the previous '*National Strategy for the Inclusion of Roma, Sinti, and Caminanti 2012-2020*' (NRIS). The text was drafted by the National Anti-Racial Discrimination Office (UNAR), the Italian National Roma Contact Point (NRCP), which since its establishment has suffered from the limitation of being placed under the direct authority of the Italian Government, thus compromising its freedom of action and independence.

The NRSF has also a structural weakness dictated by its legal nature: it has no binding capacity – leaving in fact to the free initiative of local authorities the possibility to implement or not the actions planned – and does not provide a budget specifically allocated to the implementation of the actions planned.

During the drafting phase, the NRCP has tried to ensure the activation of consultation and participation processes by expanding, compared to the past, the stakeholder audience of, opening the possibility of a greater exchange of information and contributions. This meritorious effort does not appear to have reached its full objective, clashing with the absence, in the consultative processes, of the representatives of those communities residing in formal and informal settlements, 'communities without a voice'. The critical issue of participatory processes is reflected in the text of the NRSF as there are shortcomings related to the empowerment of Roma communities, capacity building of the Roma civil society, and strengthening the participation of women.

Compared to the past NRIS, antigypsyism is finally recognised, clearly and directly, as the key to reading across all axes of intervention as it affects all areas of daily life. However, in Italy there is a lack of statistical data necessary to have a clear picture of the present, to understand the direct and indirect causes, thus not allowing the definition of specific objectives and effective actions.

The NRSF explicitly states that education represents a strategic area for Roma inclusion, as well as the importance of acquiring data and information aimed at filling in the large information gap regarding the school inclusion of Roma and Sinti students. The planned interventions seem to take a step forward compared to what was foreseen in the NRIS, configuring themselves as potentially positive as they respond to the need to promote exchange opportunities between families and schools, language mediation interventions, teacher training, interventions on educational content that encourage and facilitate knowledge on the history of Roma and Sinti groups.

On the 'Employment' axis in the past NRIS, interventions aimed at removing the elements that hinder the employment of Roma and Sinti were weak and not very incisive. These limitations re-emerge in the current NRSF, where the actions planned are developed mostly at the local level, in a fragmented manner and without a real direction for wider support that can effectively counter different forms of discrimination, promote training courses in line with the expectations of Roma and Sinti, implement interventions capable of encouraging the permanence in the labour market and the birth of self-employment. Similarly, interventions aimed at supporting the work empowerment of specific categories, such as women and young people, are few and uncoordinated.

The NRSF addresses the issue of health protection for Roma and Sinti by stating that it takes as a reference point the '*Health Action Plan for and with Roma, Sinti and Caminanti Communities*'; produced in 2015 by a working group established at the Ministry of Health, implementing the previous NRIS. The Action Plan pursued the promotion of a non-welfare but participatory model of intervention, developing the measures to be implemented around four areas: research and data collection; training of socio-health personnel and system mediation (socio-health integration); cultural mediation and facilitation; and health

awareness and education interventions. The NRSF seems to deviate from this plan in several aspects by not operating, for example, any definition of the target population of the planned interventions, often limiting itself to a generic 'Roma and Sinti', almost always referring only to communities living in formal or informal settlements.

The past NRIS had indicated as a priority the "definitive overcoming of emergency logics and large mono-ethnic settlements" through "a wide range of housing solutions". In reality, these recommendations were followed by "poor local adherence to both principles and objectives" due to the acknowledged "weakness of governance and interinstitutional cooperation" inherent in the NRIS itself, resulting, in some contexts, in the "reiteration of evictions, the practice of assisted repatriation and 'temporary' relocation in facilities not suited to the needs of the people". These limitations do not appear to have been overcome in the current NRSF. They continue to be linked above all with the fact that the NRSF itself does not provide for elements that can bind the administrations, even from a legal point of view, nor sanction those who openly violate it.

The topic of the protection of minors is not explicitly addressed and two critical issues that have emerged in recent studies are not adequately considered: the practice of forced marriages and the problems connected to the lack of legal status recognition that affects hundreds of minors from the former Yugoslavia in Italy.

In all areas of interest, the NRSF pays the price for a lack of knowledge with the consequence, for example, of failing to focus on the condition of Roma and Sinti communities of ancient migration and those of more recent arrival. Thus, the recommendation in the *EU Roma Strategic Framework* to "recognise the diversity and needs of specific groups within the Roma population" remains unfulfilled. Moreover, it does not address the phenomenon, rooted in some Italian cities, according to which access to ordinary services is hindered by the social assistance municipal structures allocated on an ethnic basis - which promote forms of support for Roma communities that are 'parallel' to those provided for ordinary citizens - failing to comply with the indication to promote actions based on a combined mainstream approach with explicit but not exclusive target groups. Finally, the NRSF does not adequately respond to the recommendations regarding the need to ensure meaningful participation of Roma in all decision-making processes; empowerment and capacity building of Roma, civil society and public authorities, building trust between stakeholders and between Roma and non-Roma communities; promotion of political, economic and cultural engagement of Roma.

The NRSF defines specific measures to be implemented for each intervention axis. Numerous targets set by the Council Recommendations are presented for each axis of intervention, but these take on little significance due to the absence of country-scale data. The planned interventions, in all cases, are described only in general terms, without any reference to the time frames to be followed for their implementation or to the implementation methods. Also missing are the expected results according to the different indicators and the methodology adopted to estimate the value of each indicator. The absence of operational methods for data collection is a particularly relevant criticism regarding the data that should be provided by public administrations, with a probable time extension.

The monitoring report concludes with eight recommendations (one addressed to the Italian Government, the others to the National Roma Contact Point) aimed at guaranteeing the total independence of the UNAR in the future, the overcoming of monoethnic settlements, the adoption of active participation approaches in Roma communities, the adoption of clear objectives for each of the actions envisaged in the NRSF, the discussion of the issue of early marriages; the creation of a legal task force to remedy the conditions of statelessness; school support measures that respect the 'Convention on the Rights of the Child and Adolescent'.

INTRODUCTION

The '*National Strategy for Roma and Sinti Equality, Inclusion, and Participation 2021-2030*' (NRSF) was adopted by directorial decree on 23 May 2022 and was signed by the Director General of the National Anti-Racial Discrimination Office (UNAR), which serves also as the Italian National Roma Contact Point (NRCP), Triantafillos Loukarelis.¹

Formally, as reported in the text of the NRSF² itself, it represents the result of a complex consultation process that lasted more than two years and was divided into the three phases:

- End of 2019 – first semester 2020: consultation with the NGOs of the National Platform of Roma and Sinti (Platform).³
- First semester 2020: UNAR signing an agreement with the National Research Council (CNR) with the aim of building an evaluation plan following the analysis of the past NRIS.
- Second semester 2020 – second semester 2021: organisation of 12 thematic meetings.⁴

For the drafting of the new NRSF, in addition to the previous '*National Strategy for the Inclusion of Roma, Sinti, and Caminanti 2012-2020*' (NRIS), the Council Recommendation made use of approximately 30 written contributions from NGOs; the minutes of the 12 thematic meetings held during the consultation process; the contributions and elements of competence sent by the administrations involved; the 'grey material' (scientific literature, institutional reports, project outputs, NGO reports).⁵

The NRSF, understood as a general strategic plan, "will be followed by an executive plan, with a series of detailed plans for the individual actions envisaged".⁶

The NRSF explicitly refers in its title to the Council Recommendation of 12 March 2021 on equality, inclusion and participation of Roma and Sinti – 2021/C 93/01 of the European Commission and represents the follow-up to the previous NRIS presented on 24 February 2012 in implementation of the Communication of the European Union Commission no. 173 of 4 April 2011.

The purpose of this report, which focuses on the assessment of the new NRSF, is to provide participatory and inclusive monitoring of its design and implementation by civil society

¹ <https://unar.it/portale/documents/20125/113907/Decereto+direttoriale+e+Strategia+Rom+2021-2030.pdf/bd13dc57-d8da-8634-56b4-a9a4d2270dc2?t=1653399007662>

² NRSF, pp. 3-4.

³ Approximately 50 organisations participated in a public discussion that took place on 14 November 2019 and over 30 organisations sent written contributions containing critical issues, good practices, and proposals for the drafting of the new NRSF (See the NRSF, pp. 3-4).

⁴ Among them, as reported in the NRSF (see p. 4), the following should be noted: a) two plenary meetings of the National Platform of Roma and Sinti; b) one meeting of the National Platform of Roma and Sinti on specific topics; c) one meeting of the Forum of Roma and Sinti communities on specific topics; d) one training and information meeting dedicated to guidelines, indicators and useful elements to encourage a participatory process in the elaboration of the document; between side-events connected to specific issues such as: the question of collecting statistical data, the topic of memory and historical knowledge, the question of the Sinti family micro-areas ; e) five meetings of ad hoc working groups on the following sectoral axes: Housing Axis; Antigypsyism Axis, Education and Cultural Promotion Axis; Governance Axis, Local Level Participation Axis; Health Axis; Work and Fight against Poverty Axis.

⁵ Ibid.

⁶ Interview with a representative of the National Roma Contact Point for the NRSF, 24 February 2022.

actors. The aforementioned text aims to provide direct information to the European Commission and the national authorities.

For the drafting of the text, the following documents were used as a reference:

- 12 interviews with panellists;
- the NRSF;
- the Communication of the European Commission no. 620/2020;
- the Council Recommendation;
- institutional reports and NGO reports produced in the last three years.

The 12 semi-structured interviews were carried out between 21 February and 15 March 2022. A focus group was organised with the involvement of a delegate from the National Roma Contact Point (NRCP) for the NRSF and a delegate from the public authority in charge of drafting the NRSF. Other interviews – carried out remotely because of the Covid-19 prevention measures taken by the Italian government in the period under consideration – were administered to:

- a councillor from the Lazio Region;
- three representatives of civil society associations: *Sucar Drom*, *Comunità di Sant'Egidio* (Community of Sant'Egidio) and *Chi rom e chi no* (Who Roma and Who Not) operating in the Municipalities of Mantua, Rome, and Naples;
- a representative of a national Roma movement, UCRI – *Unione delle Comunità Rom in Italia* (Union of Romani Communities in Italy),
- two academics from the *Università del Salento* (University of Salento) and the *Università del Sacro Cuore di Milano* (Catholic University of the Sacred Heart from Milan);
- an expert in the area of Roma education;
- a contact person from an international organisation, European Roma Rights Centre ERRC;
- a researcher from the National Institute of Statistics, ISTAT.⁷

The following organisations contributed to the preparation of this report: *Associazione 21 luglio*, coordinating organisation of the National Coalition, *Associazione Community Organising Onlus*, *Consorzio Nova*, *Cooperativa Roma Solidarietà*.

⁷ The National Institute of Statistics is an Italian public research organisation that conducts general censuses of population, services and industry, agriculture, household sample surveys and general economic surveys at the national level.

1. PARTICIPATION

1.1. Roma participation in the NRSF preparation

Accepting the European Commission's invitation to "ensure that Roma and Sinti are represented in all diversities [...] in local policy-making processes",⁸ the NRCP sought to ensure that the process for drafting the NRSF was as open as possible to consultation and participation processes, giving weight to the role of the *Forum*, which together with the *Platform*, "represent operational tools for dialogue between the UNAR, civil society, and central and local administrations involved in the NRSF".⁹

The two bodies (the Forum and the Platform) are made up of 79 associations¹⁰ scattered throughout the country but they lack adequate representatives of families in formal and informal settlements, 'voiceless communities'; still, the main actions of the NRSF focus on them.¹¹

These structural critical issues are at the root of the weaknesses of the consultative and participatory process identified in the interviews with supporters of the Roma communities and civil society.¹²

Those interviewed found that only associations with certain characteristics participated in the preparation meetings for the NRSF, such as: organisational structure; economic capacity that allowed the participation of people willing to dedicate time and resources to the intervention; adequate digital skills (that would allow for the online preparatory meetings to take place) were privileged in the pandemic context.

Even where active involvement was allowed, the interviewees¹³ themselves highlighted partial listening, having found in the text of the NRSF the failure to implement some suggestions from the representatives of the Roma communities and civil society, especially in terms of housing and antigypsyism. Finally, returning to the structural criticality mentioned above, the interviewees explicitly denounced a deficit in the criteria with which the supporters of the Roma communities that make up the Forum have been selected in recent years, especially in terms of competence, representativeness, and effectiveness.¹⁴

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

The NRSF does not investigate the value of the active participation of Roma and Sinti in its implementation, monitoring, and evaluation.

⁸ NRSF, pp. 9-10.

⁹ *Idem*, p. 27.

¹⁰ *Ibid.*

¹¹ "In the NRSF, when you find written 'Roma' and 'Sinti', you have to read 'Roma and Sinti in the camps'". Gennaro Spinelli, representative of UCRI, a Roma national movement, 14 March 2022.

¹² See interviews with Carlo Berini, representative of *Sucar Drom*, a civil society organisation, 21 February 2022, and Gennaro Spinelli, 14 March 2022.

¹³ *Ibid.*

¹⁴ "In the Forum, people who have not finished compulsory school were asked about how to improve schooling within Roma communities" (Gennaro Spinelli, 14 March 2022).

This, therefore, remains an aspect that is insufficiently addressed, as reported by the supporters of the Roma communities and civil society interviewed¹⁵ when they highlighted how only the organisations that are part of the Platform and the Forum have been involved in the past in this process; therefore, those already registered in the UNAR, are more structured from an organisational point of view and have easier access to IT tools.

Regarding the indication contained in the EU Roma Strategic Framework that Roma are adequately represented among the staff and paid experts of the NRCPs, regional and local administrations and other public bodies involved in the implementation of the NRSF,¹⁶ the interviews conducted reveal that this has not happened in the past. Last year, some associations had recommended favouring the hiring of people from the Roma and Sinti community who could mediate and raise awareness between public officials and land managers.

From this profile it emerges, as already noted in the interviews conducted, that one of the causes for the lack of Roma representation among the staff and paid experts lies in the inadequate training of some members of the Forum and “for this reason today the quality has moved away from the Forum and most of the associations that are worthwhile have moved away [from the Forum]”.¹⁷

1.3. System of policy consultation with civil society and stakeholders

A representative of the pro-Roma civil society¹⁸ recognises, on the one hand, a discontinuity compared to the past due to a greater commitment from the NRCP in expanding the audience of stakeholders consulted and an increase in the involvement in the drafting of the new NRSF.

In other regions, as reported by the same interviewee, however, there is a deficit in the involvement of local authorities, which are indispensable especially in the dissemination phase of the NRSF among the Roma communities in the territories.

In some territories, it seems instead that the Roma communities are totally divorced from any consultation system and for this reason it is necessary “to inform the Roma that this thing is happening [the publication of the new NRSF]”. In many cases it would be necessary to strengthen the process of dissemination, listening and involvement of the Roma communities “rather than organising academic activities, doing door-to-door work, which in certain contexts is necessary, perhaps making an ‘assembly’ speech about it”.¹⁹

In the text of the NRSF, it is not clear whether the NRCP has provided written participation protocols that establish the mandate (scope and nature of the commitment), the composition (principles for the selection of members), the working methods and the expected results of the consultation and participation bodies, in order to guarantee effective results in terms of cooperation, trust and responsibility.

1.4. Empowerment of Roma communities at the local level

In the NRSF there are no references to the issues covered by the aforementioned paragraph, thus revealing a gap to be filled as they are central activities that generate a

¹⁵ Carlo Berini, 21 February 2022, and Gennaro Spinelli, 14 March 2022.

¹⁶ Ibid.

¹⁷ Ibid.

¹⁸ Sandro Palmieri, representative of *Comunità di Sant’Egidio*, a civil society organisation, 1 March 2022.

¹⁹ Ibid.

significant improvement in terms of inclusion and development of the Roma and Sinti communities.

1.5. Capacity-building of Roma civil society

In the NRSF there are no references to the issues covered by the aforementioned paragraph, thus revealing a gap to be filled as they are central activities that generate a significant improvement in terms of inclusion and development of the Roma and Sinti communities.

2. RELEVANCE

2.1. Fighting antigypsyism and discrimination

Antigypsyism is the transversal key to all axes of intervention. It is still “the mother of all evils”,²⁰ “a pervasive and systemic aspect in all spheres of society”,²¹ “a neuralgic and transversal obstacle to the real implementation of any strategic framework aimed at Roma and Sinti inclusion”²² as claimed by different interviewees. In order to be able to understand and combat it, it is essential to define its origin and extent on a national and local scale, elements on which, in Italy, there is little and, in some cases, outdated information available. Statistical surveys carried out in the past are poorly suited to provide a clear picture of the present. “On antigypsyism, the data we have in Italy cannot be of statistical value”,²³ acknowledges a person with expertise in the field.

There is also a lack of comparative research in Italy aimed at investigating how and to what extent the phenomenon of antigypsyism is strengthened precisely where it is linked to the presence of so-called ‘nomad camps’ or mono-ethnic residential areas, to marginalising and excluding living conditions, to forms of serious socio-economic precariousness, to socio-environmental degradation, to deviance and to what is experienced by the approximately 13,000 individuals living in formal mono-ethnic settlements.²⁴ It is therefore difficult to distinguish within the public opinion the aversion to the Roma and Sinti as such, from the target group of those experiencing social marginality, antigypsyism from ‘*aporaphobia*’ (aversion to poorer groups), and negative perceptions of Roma communities from the homeless.

These limits are made explicit, but not addressed, in the NRSF itself where it merely acknowledges how antigypsyism represents “a specific form of racism that is among the most difficult to decode”.²⁵

The issue of antigypsyism in Italy is also “still little debated in the context of school education at all levels, starting with university education. But it is also not very present within the Roma and Sinti communities”,²⁶ where programmes should be promoted “to instil greater confidence in them, to make them safe and prepared to report any acts of discrimination”.²⁷

The NRSF, recognising its importance and centrality, devotes a special chapter to the subject, considering that antigypsyism affects “all areas of daily life, from transport to the right to housing, from access to the labour market, to health, to the right to study, both in real life (off-line) and in virtual life (on-line)”.²⁸

Four declinations of antigypsyism are examined: the one “present in the public sphere – with particular reference to social – and in the political debate”, “the phenomenon of intersectional discrimination”, “discrimination in access to housing”, “episodes of violence,

²⁰ Representative of ERRC, 1 March 2022.

²¹ Representative of *Sucar Drom*, 21 February 2022.

²² NRSF, p. 31.

²³ Researcher at the National Institute of Statistics, 8 March 2022.

²⁴ On this number, cf. www.ilpaesedeicampi.it

²⁵ *Idem*, pp. 32-24.

²⁶ Expert in the area of Roma education, 22 February 2022.

²⁷ Representative of *Sucar Drom*, 21 February 2022.

²⁸ NRSF, p. 29.

conflict and protest”.²⁹ In the absence of data and information, the pervasiveness of antigypsyism among civil servants, among teachers, among policy-makers is not adequately explored.

Little analysed is its impact within Roma and Sinti communities – especially those in conventional housing – where it often induces defensive strategies of concealment and camouflage.

To promote efforts to counteract it, a series of measures are reported in the text of the NRSF. The measures range from strengthening the UNAR Contact Centre to training activities for the categories of public and non-public officials, from a specific survey on the level of antigypsyism to the organisation of information campaigns, debates, positive narratives. Specifically, the proposal is formulated, to be developed in the period 2021-2030, consisting of a '*National Communication Campaign against Antigypsyism*'. Considering the importance of the issue, reference is also made to the future possibility of "establishing an autonomous strategic plan; the need is expressly recognised".³⁰

According to some of those interviewed, the proposals put forward in the NRSF "limit themselves to general campaigns and do not mark a change in perspective compared to the previous NRIS",³¹ remaining very vague on the subject "because it does not provide for specific measures and actions to combat antigypsyism".³² Furthermore, it does not provide for measures to fill the knowledge gap to the extent of the phenomenon in the different areas of the public and private sphere, with information that is indispensable for clearly defining objectives and indicators.

2.2. Education

The data available today from local surveys, project activities and case studies,³³ although they cannot be considered statistically representative,³⁴ highlight - in particular for Roma and Sinti citizens who live in mono-ethnic settlements – a relationship with the school characterised by attendance, occasional and irregular, achievement of educational qualifications that generally do not exceed those of compulsory education, high rates of dispersion and early dropouts from school, especially for the female adolescent component. These challenges are recognised by the NRSF, which considers schools and interventions aimed at encouraging the participation of Roma and Sinti in all levels of school education (from pre-schooling to university) as strategic areas for the more general social inclusion of Roma and Sinti.

School in different parts of Italy, especially in some southern areas, has represented a laboratory and a place of exchange and privileged knowledge between Roma and non-Roma groups.³⁵ Where Roma have entered contexts where there has been an absence of

²⁹ Idem, pp. 31-32.

³⁰ NRSF, p. 32.

³¹ Representative of *Chi rom e chi no*, 1 March 2022.

³² Representative of *Sucar Drom*, 21 February 2022.

³³ See among others: Pasta S. (2020), *Rom e sinti in Italia. Tra "tutela del nomadismo", culture presunte, campi, disagio sociale e povertà educativa"* Scholé. Rivista di educazione e studi culturali, LVIII, n. 2., pp. 189-198. Ciniero A., (2021), *Un progetto per l'inclusione di Rom e Sinti. Una sperimentazione importante e faticosa*, Articolo 33 – Edizioni Conoscenza, Roma, pp. 47-52. See also the section dedicated to context analysis and schooling in the Eight Local Action Plans for the inclusion of Roma and Sinti developed within the 'PAL' project: <https://pianiazionelocale-rsc.com/2021/11/25/here-are-8-cities-local-action-plans>.

³⁴ One of the elements of low representativity is, as shown in the NRSF as well, an almost exclusive presence of children in settlements.

³⁵ See, among others: Pontrandolfo S., (2004). *Un secolo di scuola. I rom di Melfi, Roma, CISU*. Ciniero A., (2017), *Mascarimiri, come legge! percorsi scolastici, identità e rielaborazione delle appartenenze*

special policies reserved for them, where housing policies focusing on mono-ethnic settlements have not been developed, and where special *'lacio drom'*³⁶ classes have not been established, there have been found, not only in relation to school inclusion, but also more generally better results in relation to the social inclusion of Roma groups and the positive interaction between them and the rest of the population. It is probably appropriate to start again from the experience that these cases teach to plan effective interventions aimed at supporting the paths of social inclusion.

In the NRSF, regarding the Education area, the validity of the objectives of the NRIS³⁷ is reaffirmed and the implementation of seven specific interventions is envisaged.³⁸ Only two specific objectives not clearly linked to the seven actions are indicated. Seven outputs indicators and seven outcome indicators are identified. The methodology for calculating the indicators is not clearly explained, nor is the expected value of the indicators indicated.

Even in the presence of these criticalities, the planned interventions are relevant to the Italian national context. In Italy, as evidenced by the NRSF itself and as also reported in other contributions,³⁹ there is a substantial absence of statistically reliable data related to the issue of school inclusion of Roma and Sinti.

Carrying out surveys is therefore certainly a positive intervention that can increase knowledge on the phenomenon and support the development of more targeted actions. The other planned interventions are also potentially positive because they respond to the need to promote exchange opportunities between families and schools, linguistic mediation interventions, teacher training, interventions on didactic contents that can facilitate knowledge on the history of Roma and Sinti groups and on the interaction processes that have taken place in the various territories.

For educational interventions to be effective, they need to be planned and implemented in a complex and multidimensional way. As stated by one of the interviewees, one of the leading Italian scholars of the relationship between educational policies and social inclusion of Roma groups: "School education is a topic that is absolutely debated by the NRSF, but for it to be effective, actions are also needed to counter antigypsyism in society".⁴⁰

2.3. Employment

In the sections of the NRSF dedicated to the topic of employment, it is explicitly stated that "access to employment is still severely limited today for many Roma and Sinti of

culturali nel racconto intergenerazionale di una famiglia rom dell'Italia meridionale. Note su un'indagine in corso. In Rivista di Storia dell'Educazione, [S.I.], v. 4, n. 1.

³⁶ Established in 1965 through a memorandum of understanding between the Ministry of Education and Opera *Nomadi*, these special classes, intended exclusively for Roma and Sinti children, were only finally abolished in 1982.

³⁷ The fact that the new NRSF still recognises the validity of the objectives set by the previous NRIS with respect to the axis of education is an element that, at least indirectly, recognises the fact that these objectives were not achieved by the NRIS.

³⁸ A national background research on the level of inclusion of Roma and Sinti in the school system; a sample survey on a territorial basis on the level of early school leaving of the Roma and Sinti communities; interventions on 'families and school'; cultural and linguistic mediation interventions; interventions on educational content (as an opportunity to meet); positive actions that favour the permanence in the education and training path; training of teachers and school staff.

³⁹ See the chapter '*Manca di dati affidabili su RSC*', edited by Antonio Ciniero, in the '*Rapporto di monitoraggio della società civile sull'implementazione della Strategia nazionale di inclusione Rom, Sinti e Caminanti in Italia. Individuazione dei punti deboli della politica di inclusione*' (2020), pp. 23-27 <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-3-italy-2019-eprint-it.pdf>.

⁴⁰ Expert in the area of Roma education, interviewed on the 22 February 2022.

working age by a generalised collective stigmatisation, low levels of education, low levels of vocational training, poor access to services, socio-legal precariousness, housing and high levels of social vulnerability".⁴¹

According to what was found in the second cycle (2018) of the Roma Civil Monitor 2017-2020 pilot project, the area of employment in the 2012-2020 period is among those that recorded the lowest number of interventions aimed at removing the elements that hinder the employment of Roma and Sinti.⁴² The few initiatives were developed mostly at the local level, in a fragmented way and without a real direction of broader support that could effectively combat forms of discrimination, promote training courses in line with the expectations of Roma and Sinti, implement interventions capable of encouraging the permanence in the dependent labour market and the birth of autonomous activities. Likewise, few and uncoordinated interventions were aimed at supporting the employment empowerment of some specific categories, such as women and young people. These are critical issues which, as noted by one of the interviewees, also seem to characterise the current NRSF that in fact is entrusting everything to the will of local authorities.

As known in the literature – and as underlined by at least three people interviewed for the preparation of this report⁴³ - working to develop pathways for work inclusion is particularly complex. The effectiveness of these paths is likely to be undermined so much by some characteristics (low levels of schooling, poor professionalisation, documentary irregularities, etc.) that characterise the background of a large part of Roma and Sinti people, especially those who live in settlements. We must then also consider some contextual elements that have to do, on the one hand, with forms of discrimination and the widespread antigypsyism, on the other hand, with the characteristics of the Italian labour market which, as happened in all the advanced capitalist countries,⁴⁴ in recent decades has experienced significant processes of the precariousness of the working condition. Furthermore, in some areas of the Italian territory, these critical issues are joined by others, such as those linked to the significant diffusion of irregular forms of work and high rates of exploitation, in particular for some economic sectors.⁴⁵ All these critical issues, in the last two years have been exacerbated even more by the social fallout of the health crisis from Covid-19".⁴⁶

⁴¹ NRSF, p. 42.

⁴² See the chapter dedicated to employment edited by Antonio Ciniero, *Employment*, pp. 13-21: <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-2-italy-2018-eprint-fin-2.pdf>.

⁴³ Interviews with a Roma education area expert carried out on 22 February 2022; Representative of ERRC, 1 March 2022; Representative of *Chi rom e chi no* on 1 March 2022.

⁴⁴ The literature on these issues is now very extensive, for a quick reconstruction of these dynamics see, among others, Sennet R., 1999, *The Corrosion of Character: The Personal Consequences of Work in the New Capitalism*, Norton & Co.

⁴⁵ Think of the case of seasonal agricultural work which, in some Italian geographical areas, represents a significant labour allocation basin for Roma, especially of foreign and community origin (Bulgarians and Romanians in particular). For further information on this aspect, in addition to the aforementioned *Employment* of the second RCM, see Ciniero A., 2019, *Analisi dei processi di esclusione/inclusione sociale dei gruppi rom. Un caso studio* in Palaver, n. 8, pp. 103 – 156. Available at:

<http://siba-ese.unisalento.it/index.php/palaver/article/view/20297>.

⁴⁶ To the social effects of the health crisis generated by Covid 19, particularly those that directly affected the work of many Roma and Sinti, several moments of discussion and study were dedicated as part of the activities of the project called "PAL: Local Action Plans" that involved stakeholders engaged in social inclusion processes for Roma and Sinti in eight Italian metropolitan cities. For further information, see the sections dedicated to the topic of work in the eight Local Action Plans available at this link: <https://pianiazionelocale-rsc.com/2021/11/25/ecco-i-piani-di-azione-locale-delle-8-citta/>.

Again, regarding the employment issue, the NRSF, while underlining the fact that work represents “the cornerstone of the success of any inclusion policy, capable of definitively countering any prejudicial attitude towards Roma and Sinti,⁴⁷ does not indicate clear and measurable objectives but confines itself to uttering some auspices.⁴⁸ Two specific objectives are identified in this section. Ten outputs indicators and five outcome indicators are identified. The methodology for calculating the indicators is not reported, nor is the expected value of the indicators indicated.

The planned measures are certainly interesting and useful, but the NRSF does not clearly define objectives and implementation methods, which makes it difficult to assess their feasibility.

The section dedicated to the topic of employment closes with the publication of two different proposals drawn up by civil society organisations.⁴⁹ It is not specified how these proposals will be implemented.

2.4. Healthcare

The NRSF addresses the issue of health protection for Roma and Sinti starting from a context analysis in which, to identify the main health problems and access to health services of Roma and Sinti, it refers to the ‘*Plan of Health Action for and with the RSC Communities*’⁵⁰ produced in 2015 by a panel set up at the Ministry of Health, for the implementation of the previous NRIS, and the ‘*Health Project – Promotion of Strategies and Tools for Equity in Access to the Health Care of Roma, Sinti, and Caminanti*’, coordinated by the UNAR and the National Institute for Health, Migration and Poverty (INMP) and funded under the PON Inclusion 2014-2020.

While declaring the Health Action Plan “a still valid tool, whose intervention indicators, appropriately updated, can help respond to the health needs of Roma and Sinti in the perspective of the new NRSF”,⁵¹ it is not in line with the underlying spirit of the Health Action Plan, which pursued the promotion of a non-welfare, participatory model of intervention, and develops the measures to be implemented around four areas:

1. Research and data collection;
2. Training of socio-health personnel and system mediation (socio-health integration);
3. Mediation and cultural facilitation;
4. Outreach and health education interventions.

In addressing the identified areas, it offers few references to justify the problems identified, it has little internal consistency between the problems indicated, the actions identified and the indicators proposed, and above all, it does not consider some indispensable assumptions, which constitute its main criticalities.

⁴⁷ NRSF, p. 42.

⁴⁸ In fact, the text states that “UNAR, in the context of the Labour Axis of the NRSF, hopes to expand job placement opportunities, both through access to employment and from an entrepreneurial point of view, with an improvement of the employability of the recipients and a consequent “normalisation” of their presence in the formal economy”.

⁴⁹ The first, titled ‘*Ecological Transition and Circular Economy*’, developed by the *Kethane – Roma and Sinti Movement for Italy*, focuses on enhancing the market sector that caters to second-hand. The second, titled ‘*Job & Enterprise Creation*’, developed by the *Associazione Cittadinanza e Minoranze*, focuses on an individual training course based on the ‘balance of skills’ of each person to detect their propensities, aspirations and potential to then compare them with the job opportunities to look for.

⁵⁰ Available at: https://www.salute.gov.it/portale/documentazione/p6_2_2_1.jsp?lingua=italiano&id=2451

⁵¹ NRSF, p. 58.

No definition of the target population of the interventions is made, limiting itself to a generic Roma and Sinti. Yet the NRSF itself, in point 1.4, while highlighting the “reduced availability of scientifically reliable socio-demographic and economic statistical information”,⁵² describes an extreme variety of living conditions and insertion into the educational, housing and economic pathways of Roma groups and Sinti, which require completely different reasoning regarding health pathways. On the other hand, reading the paragraph shows an identification of the Roma and Sinti with those who live in the settlements, both formal and informal, in conditions of marginalisation and often misery, which is declared, again in point 1.4, to be calculated as 30,000 people out of the 120,000-150,000 present in Italy.

Apart from the need to justify such a choice, it follows from this that the data collection and the definitions of indicators can be distorted, since the reference population is not clear.

In close connection with this last point, we can see the danger of identifying the socio-cultural characteristics of the Roma and Sinti population with the conditions of marginalisation and misery in which some groups live, more specifically those who are in the settlements. This assumption may be the basis of some prejudices suffered by Roma and Sinti as they are often confused behaviours and survival strategies due to poverty with cultural characteristics.⁵³

In health, this aspect is obviated by working from the perspective of explicit, but not exclusive Rome targeting, which translates into building social and health services that pursue equity, so that each individual is offered opportunities to protect their own health, commensurate to its initial objective situation, both health and socio-economic. This requires, in addition to the training of social and health personnel, which is considered in the NRSF, the reorganisation of services as well with a view for the mediation of the system to be considered in the Business Plans and in the internal protocols of the structures.

The need, identified in the NRSF, for the National Health Service to support the drafting and adoption of local implementation protocols for the Health Action Plan, capable of translating the indicators contained in the national guidance documents into the organisational reality of the services, is not supported by governance measures at central level. Finally, to remedy the lack of knowledge of the health needs of the Roma population, it is necessary to pursue the participation of the Roma themselves in the choices that involve them, so that the communities are not passive objects but participate with equal dignity in the definition and implementation of adequate interventions in promoting health.⁵⁴ Only by pursuing a constructive dialogue between health workers and Roma, aimed at recovering mutual trust, listening to the priorities identified by those in a situation of fragility, promoting mutual knowledge, transparency in communication and assistance paths, will it be possible to build paths of effective and shared health protection.

2.5. Housing, essential services, and environmental justice

In the Italian public and political debate, the issue of residential segregation of Roma communities in housing emergency has been consolidated for 30 years as “a fundamental

⁵² NRSF, p. 13.

⁵³ Remember A., Motta F., Geraci S. 2014. *saluteRom. Itinerari possibili*. Pendragon, Bologna.

⁵⁴ National ‘Health’ panel for the implementation of the NRSF: ‘Health Action Plan for and with the Roma, Sinti, and Caminanti Communities’. May 2015.

hub in the process of overcoming social unease and harmonious integration into society, for the contrast and fight against poverty extreme".⁵⁵

In Italy, defined since 2000 as 'The Country of the Camps', around 13,000 Roma and Sinti live in mono-ethnic settlements, marked by poor security, severe sanitary conditions, and lack of ownership security, where the inhabitants are excluded from the processes of environmental democracy.

For this reason, the past NRIS had indicated among the priorities the "definitive overcoming of the emergency logics and large mono-ethnic settlements" through "a wide range of housing solutions".⁵⁶ In reality, these recommendations were followed by "a poor adherence at the local level to both principles and objectives" due to the recognised "weakness of governance and interinstitutional cooperation"⁵⁷ inherent in the NRSF itself with the result, in some contexts, of "reiteration of evictions, the practice of assisted repatriation and 'temporary' relocation to structures that are not suited to the needs of people".⁵⁸

Despite the centrality recognised by all of these problems, Italy has never fully understood in the past years the importance of punctually mapping the extent of the phenomenon of mono-ethnic settlements and only the recent surveys conducted by the National Institute of Statistics (ISTAT) made it possible to estimate, as reported in the NRSF, a presence within a range of between 15,000 and 30,000 people. A survey conducted by the *Associazione 21 luglio* and presented in the Senate on 7 April 2022 reports, through a special website,⁵⁹ the updated numbers of Roma and Sinti in housing emergency. The current picture indicates a total presence of Roma and Sinti within mono-ethnic settlements outdoors and indoors equal to about 20,000 units.⁶⁰

The following measures to be implemented are reported in the NRSF: a) the promotion of research activities through mapping, research and analysis; b) strengthening the intervention capacities of local authorities by offering technical support and promoting training courses; c) mediation, information and awareness raising; d) interinstitutional activities for the promotion of access to housing; e) the promotion of guidelines on how to access public buildings, cohousing and self-construction measures.

Without additional details, these actions are likely to remain good intentions, failing to generate the desired impact. Several interviewees, therefore, judged them to be of little incisiveness, aimed at maintaining the current situation, and probably insufficient to generate a real discontinuity from the past.

Two major issues were highlighted by representatives of the civil society: the failure to take into account the housing conditions of Roma of Italian nationality of ancient settlements and of the families present in informal settlements; the scarce attention paid to the issue of the involvement of the Roma and Sinti communities in the decision-making processes related to the escape from the settlements.

⁵⁵ NRSF, p. 49.

⁵⁶ NRIS, p. 51.

⁵⁷ NRSF, p. 50.

⁵⁸ Ibid.

⁵⁹ www.ilpaesedeicampi.it

⁶⁰ Specifically: about 8,400 Roma present in 70 formal settlements; about 5,000 Sinti present in 73 formal settlements; about 200 Roma present in two collection centres; about 1,000 Roma present in five mono-ethnic residential areas represented by public housing; about 5,500 Roma living in informal settlements (see: www.ilpaesedeicampi.it).

“The NRSF does not take into consideration the Italian Roma of ancient settlements who, among other things, are much greater in number than the others”,⁶¹ argues the representative of a Roma movement. Indeed, the NRSF does not seem to focus attention on the ghetto housing conditions experienced for several decades by ancient Romani communities present above all in the Abruzzo Region and the Calabria Region.⁶² At the same time, there are no traces, neither in the territories but not even within the text of the NRSF – of public policies to support the approximately 5,500 people residing in extreme housing conditions in informal settlements other than those implemented through forced eviction actions. “Effective public policies for overcoming informal settlements - acknowledges a UNAR representative – are not yet seen. The team has not been found neither in small towns nor in large cities”.⁶³

On the second aspect, that is linked to the involvement of Roma communities, the interviews show the lack of importance recognised by the NRSF of the need to “build a path that must necessarily be done together with the Roma and Sinti communities”,⁶⁴ that is to say promoting “a shared planning that allows the community [resident in the settlements] to relate with the available solutions; because otherwise, if they are not involved in the processes, a clash is created that also interrupts the attempt to implement policies that are truly positive for them too”.⁶⁵ A shared opinion is that of participatory planning, unexplored in the NRSF, that can and must represent a model to be taken as a leading reference in the processes of overcoming mono-ethnic settlements.

2.6. Social protection

The main instrument of social protection, only recently inaugurated by the Italian Government, is represented by the ‘Citizenship Income’, introduced by Decree Law No. 4 of 28 January 2019, as a measure to combat poverty through economic support aimed at reintegration into the labour market and social inclusion. This instrument appears to have been adopted by many Roma and Sinti families residing in the settlements, even though a portion of them were excluded due to the absence of the basic requirement of civil registration.

In the NRSF, too little emphasis is given to this latter issue, which deprives hundreds of families, some of whom have been present in Italy for several decades, of a series of benefits aimed at socio-economic inclusion.

2.7. Social services

For some Roma and Sinti communities, the use of ordinary welfare services is often hindered at local level by the lack of correct information, by the isolation of the settlements in which they live, which makes it difficult to reach them, by isolated phenomena of discrimination, by the lack of legal regularity.⁶⁶

⁶¹ Representative of the Roma movement, 14 March 2022.

⁶² In the Abruzzo region, there are entire neighbourhoods inhabited by Roma communities, especially in the peripheral areas of some cities. In that of Calabria, we find two examples of mono-ethnic public housing in the city of *Gioia Tauro* - where there are about 300 people - and in *Cosenza*, where since 2002, about 540 people have been concentrated in *via degli Stadi*. We also find similar situations in three other municipal contexts (see www.ilpaesedeicampi.it).

⁶³ Contact Point Delegate for the NRSF, 24 February 2022.

⁶⁴ Expert in the area of the Roma education, 22 February 2022

⁶⁵ Ibid.

⁶⁶ This information is highlighted in the results elaborated within the survey reports edited within the project: ‘Pilot Interventions for the Creation of Panels and Networks of Stakeholders Involved in Various Capacities with the RSC, Roma, Sinti, Caminanti Communities’, to encourage the participation of Roma in the

When in the implementation of inclusive policies to escape from mono-ethnic settlements, the aim is to tackle these problems, too often there is a tendency to favour interventions based on the belief that we are dealing with homogeneous communities rather than favouring personalised interventions tailored to the particular situation.⁶⁷ In some contexts there is also the serious problem related to the nonregistration of third and fourth generation Roma citizens, which precludes access to any welfare service.

The most fragile and marginalised categories – among which the Roma and Sinti communities in housing emergency must certainly be included – were those most affected by the socio-economic consequences of the Covid-19 pandemic, putting them at risk of full participation in the social life of the Country and excluding them from the implementation of essential levels of social, health and economic benefits.

Within the NRSF, it is repeatedly reiterated that the issue of equitable and non-discriminatory social protection must fall within the principle of equal treatment. At the same time, it is emphasised that social support can be effective insofar as it is based on an integrated approach that combines actions ranging from job inclusion to access to education, from professional training to business creation.

It is, therefore, necessary to intervene - and on this, the NRSF is limited to a few hints⁶⁸ – towards the removal of the main obstacles through the introduction of cultural mediators to improve access to welfare services; the removal of housing desegregation by overcoming mono-ethnic settlements; the organisation of permanent training for social workers to remove prejudices and stereotypes, too; the activation of processes aimed at legal regularisation; the activation of personalised social policies linked to individual and family characteristics. Regarding the lack of registration, “it would be necessary to seriously address the issue at the central level [of government] in order to definitively resolve some problems”.⁶⁹

These actions, formulated in a purely proactive manner and with extremely generic objectives, do not seem sufficiently adequate to address the problems encountered in a clear and explicit form.

2.8. Child protection

In particularly deprived contexts, the issue of child protection should be a top priority, because of the problems related to the lack of recognition of fundamental children’s rights enshrined in the Convention on the Rights of the Child. Despite this, within the text of the NRSF, with regard to the Roma and Sinti communities in housing emergency situations and, therefore, belonging to these groups, there is no section specifically dedicated to the topic. It should be transversal to the different areas addressed within the text, but in reality, it is given very little consideration by the authors of the text and relegated to mere general considerations.

Within the NRSF, generic references on the subject of the protection of minors are found above all in the introductory section of the text, where it is made explicit, that “the fight against multigenerational poverty [...] develops through measures for the protection of minors; resources for early childhood education and care [...], nutrition, personal development, and work with families. Participation in early childhood education and care is also accompanied by the protection of women, children and young people through

social, political, economic and civic life (<https://pianiazionelocale-rsc.com/>) implemented in eight Italian metropolitan cities.’

⁶⁷ See in this regard: *Associazione 21 luglio, Oltre il campo*, Roma, 2021.

⁶⁸ The NRSF includes some actions involving the introduction of socio-health mediators, the overcoming of mono-ethnic settlements, the training of socio-health workers, and legal regularisation.

⁶⁹ Academician, 4 March 2022.

strategies to combat crimes, such as trafficking in human beings, including any form of exploitation”.

Studies carried out in recent years have shown how the issue is of particular importance, especially for two critical reasons that are little dealt with by political decision-makers, poorly addressed by the press, and sometimes denied or supported within the Roma communities themselves: the practice of forced marriages⁷⁰ and the problems related to the nonrecognition of legal status.⁷¹ On the latter issue, as also reported by the UNHCR, it is necessary to start as soon as possible: “measures aimed at the regularisation of the legal status and the protection of stateless persons or persons at risk of statelessness belonging to the Roma communities [...] which envisage the involvement of the various relevant counterparties, such as local administrations, police headquarters, prefectures and foreign representations in Italy”.⁷²

In the paragraph of the NRSF referring to the ‘Evolution of the Statelessness Issue’, the absence of specific actions is noted, especially about the conditions of Roma children. For this reason, some interviewees underline the importance of: “seriously addressing the issue at the central level and resolving some problems definitively”,⁷³ highlighting how “it would be desirable that the NRSF succeeds in providing for the first time a table on statelessness that finally brings in the results”.⁷⁴

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

According to the NRSF for the fight against discrimination and antigypsyism, “the theme of promoting knowledge of Romani art, music, history and culture becomes a key element”⁷⁵ on condition of avoiding the risk of falling into a process of ‘folklorisation’ “which in the past has fuelled already existing stereotypes”.

It should not be forgotten that Italy is characterised by a strong fragmentation of the Roma and Sinti communities. Conventionally, in the light of the different migratory flows, 22 communities attributable to the Roma ‘galaxy’ are indicated.⁷⁶

In the light of this composite framework – within which each group, and sometimes even each subgroup, is linked to different traditions, speaks a different dialect, practices art in various forms, and even fails to recognise other communities as part of a single population – and to the various processes of cultural hybridisation, it remains extremely complex to

⁷⁰ Research carried out among the inhabitants of the Roma settlements in the city of Rome in 2017 found that in contexts where the presence of families from specific urban areas of Romania is significant, the rate of the phenomenon of early marriages reaches 77%, even exceeding the negative world record held by Nigeria. See *Associazione 21 luglio, Mia madre era rom (My mother was Roma)*, Roma, 2017.

⁷¹ A national report showed that in Italy the number of minors, children of citizens of former Yugoslavia born in Italy, at high risk of statelessness, is about 500. The first condition of such minors, without citizenship and without a country, is to find themselves from birth in the absence of any constitutionally recognised right. See *Associazione 21 luglio, Fantasmì Urbani (Urban ghosts)*, Roma, 2020.

⁷² UNHCR, *Recommendations on the Protection of Stateless Persons in Italy*, Rome, 2021.

⁷³ Academician, 4 March 2022.

⁷⁴ Representative of ERRC, 1 March 2022.

⁷⁵ NRSF, p. 60.

⁷⁶ The Italian Roma of ancient migration, divided into five groups (Roma from Abruzzo, Roma *Celentani*, Roma *basalisk*, Roma from Puglia, Roma from Calabria); the Sinti, which include nine macro groups (*Piedmontese Sinti*, *Lombard Sinti*, *Sinti Mucini*, *Sinti Emiliani*, *Sinti Veneto*, *Sinti Marche*, *Sinti Gàckanè*, *Sinti Extremekhària*, *Sinti Kranària*); the recently immigrated Balkan Roma, including at least five macro groups (Roma *harvati*, Roma *Kalderasha*, Roma *Xoraxanè*, Roma *Sikhanè*, Roma *Arlija / shiptaira*); recently immigrated EU Roma (Romanian Roma and Bulgarian Roma). Within this ‘galaxy’, walkers must also be included, a group originally from Noto, in the province of Syracuse.

determine artistic aspects that can be clearly traced back to the Romani culture. In Italy, for example, in the absence of a standardised Romanes language, the use of different dialects prevails and, in more and more cases, the exclusive use of the Italian language is privileged within the new generations. According to the representative of a national movement made up of ancient Roma: "If the Roma culture disappears, we will remain a social problem. We have a cultural identity as we speak a language, we cultivate traditions."⁷⁷

Too often, as denounced by some interviewees, the Roma issue in Italy is placed on the level of a mere social emergency, forgetting the valuable contribution, also cultural, made by Roma and Sinti communities in history.⁷⁸

On this topic, the objectives envisaged in the NRSF are two: "the promotion of artistic-cultural initiatives" and "the knowledge and promotion of the Romani language",⁷⁹ initiatives which, in the light of the aforementioned criticalities, run the risk of remaining on the surface, without really affecting the Italian cultural context. For this reason, a highlighted priority could become that of strengthening historical research through adequate funding. "In Italy, in fact, we should work to raise awareness of the cultural contribution given by Roma and Sinti in history to European culture".⁸⁰

⁷⁷ Representative of *UCRI*, 14 March 2022.

⁷⁸ Representative of *Sucar Drom*, 21 February 2022.

⁷⁹ NRSF, p. 61.

⁸⁰ Contact person for *Sucar Drom*, 21 February 2022.

3. EXPECTED EFFECTIVENESS

3.1. Coherence with related domestic and European policies

The NRSF is formally consistent with the framework of European policies. Indeed, the document implements the 'EU Roma Strategic Framework for Equality, Inclusion and Participation', including among its priorities the three pillars of the ten-year Plan: equality, inclusion, and participation.

In the NRSF these three pillars are declined, giving centrality to these three issues:

1. Fight against antigypsyism;
2. Fight against multigenerational poverty;
3. Promotion of Roma and Sinti participation.

Furthermore, the NRSF is coherent with the following European policy documents also adopted at the national level by Italy:

- The Charter of Fundamental Rights of the European Union;
- EU Anti-racism Action Plan 2020-2025;
- Union of Equality: LGBTIQ Equality Strategy 2020-2025.

3.2. Responsibility for NRSF coordination and monitoring

Responsible for the Coordination of the Italian NRSF is the UNAR, established within the Department for Equal Opportunities of the Presidency of the Council of Ministers. The fact that the Italian NRCP, unlike what happens in other countries, is established within a department directly under the Italian Government, represents a critical point since, at least potentially, its freedom of action and independence could be compromised.

Although the Decree establishing the UNAR Office (2003), in Article 2, specifies that "the Office has the function of ensuring, in full autonomy of judgement and in conditions of impartiality, the effectiveness of the principle of equal treatment between people, to monitor the effectiveness of the instruments of protection in force against discrimination",⁸¹ the appointment of the Director who coordinates the office is of political competence; the General Director, in fact, is appointed by the President of the Council of Ministers or a Minister delegated by him.⁸²

3.3. Quality of the plan

The NRSF for each axis of intervention defines specific measures to be implemented. Each of them is presented the objectives set by the Council Recommendations, but the objectives are not always defined taking into account the specificities of the Italian context. For each axis, there are specific interventions or measures to be defined according to the objectives set by the Council Recommendations.

The planned interventions, in all cases, are described only in their general characterisation, without making any reference to the time frame to be followed for the implementation of the interventions, or the implementation methods of individual interventions.

Furthermore, although in the description of each axis (Section no. 3 of the NRSF) there is a paragraph titled 'Measures and Indicators', the indicators are not always identified, and

⁸¹ Decree of the President of the Council of Ministers of 11 December 2003 (the constitution and internal organisation of the UNAR).

⁸² <https://www.UNAR.it/portale/struttura>

where they are (Health and Cultural Promotion),⁸³ it is not made clear whether those indicated are process, structure or result indicators, nor is the expected value of the indicator mentioned, nor, again, the methodology to be followed in estimating the value of the indicator. In this regard, it should be noted that in the NRSF reference is made to "a dynamic appendix containing a focus on process and result indicators",⁸⁴ but in the document provided for this analysis, the appendix is not included.

3.4. Funding

The NRSF does not foresee a specific budget for its implementation. It only lists possible financing channels. In the paragraph dedicated to 'Financing the Strategy' (4.5), the types of financing channels that contribute to the implementation of the actions and intervention objectives are listed. The financing channels are distinguished by level; national funds and regional or local funds are mentioned.⁸⁵ In addition, there is a focus on Community Programming 2021-2027.

No reference is made in the paragraph to the quantification of resources to be used. When the measures and interventions to be implemented are described, no indication is given of the possible channels that can be used to finance interventions from those listed in the paragraph on financing.

3.5. Monitoring and evaluation

The NRSF specifies that this activity will be coordinated by the NRCP, envisaging the use of a standardised structure, process and result indicators, and tools for collecting and measuring activities and results. In this regard, it is specified that data collection systems will be set up for each axis and each programme/project implementing the axes will be obliged to collect and transmit periodic surveys of the set indicators.

In addition, it is also specified that the public administrations and private social associations involved in the implementation of the measures of the NRSF will have to provide the Monitoring and Evaluation Unit (M&E) of the NRCP, on a quarterly basis, with statistical surveys of the outputs and outcomes of the projects. In order to achieve this,

⁸³ The indicators identified for the 'Health' Axis are: National pilot survey on the gap between life expectancy of Roma and Sinti groups, and the general population; Surveys on the level of relevant and perceived discrimination in access to social-health services by Roma and Sinti groups; Implementation of a Web platform dedicated to the dissemination of materials of social-health interest to Roma and Sinti; Training courses for operators of the NHS, municipal social services and private social services; Support the local implementation of the RSC Health Action Plan, through the elaboration of corporate protocols; Make a stable and systematic - on a national scale - educational pathway for local health authorities for Roma and Sinti mediators/facilitators in health care; Information tools (also visual) for orientation to social-health services and materials for health education activities in favour of hard-to-reach groups, also in Romanes language. The indicators identified for the 'Culture Promotion' Axis are: The provision of budgets and co-funding - both at the central and local level - for initiatives related to these issues; Training and information paths related to art, culture and identity issues to be proposed to the public administration and various stakeholders (or proposed independently by the same); The participation of the 'gagé' population in artistic-cultural Romani events; The presence of cultural initiatives promoted by Roma and Sinti in the calendar of national cultural events; Increased awareness and knowledge of Romani and Sinti historical and linguistic elements among institutions, territories, and the general population; Experiments and innovative proposals for teaching elements of Romani history and cultures in schools; Definition and support of memorial spaces, monuments and other commemorative works in places not previously valued, accompanied by initiatives and events.

⁸⁴ NRSF, p. 4.

⁸⁵ Among the state funds, are listed those already allocated to the chapters of respective competence of the central Administrations; national and community funds related to national operational programmes financed by the European Social Fund and managed by the central Administrations; national and community funds related to national operational programmes financed by the European Regional Development Fund; additional resources that are made available for specific chapters of competence of the Department for Equal Opportunities. Among the funds at regional or local level, are listed: funds related to the Regional Operational Programmes (POR), individual for each region and managed by the regional administrations; national, regional and local funds independently managed by the regions and the system of local autonomies.

an M&E unit will be set up to coordinate the collection and analysis of statistical data coming from the Administrations and existing statistical sources related to the thematic areas.

The actual implementation of monitoring activities presents at least the following critical points that may negatively affect monitoring activities:

- The methodologies (concerning definition, sources of data, and other important details) are not defined. It would have been appropriate to define before the implementation of the NRSF the expected value of the indicator and the methodologies with which to estimate the indicator.
- At present, the sources to be used to collect the data necessary for monitoring have not yet been defined, nor have the data collection tools or the operational methods with which the data will be collected. The absence of operational methods for data collection is a particularly relevant criticism of the data to be provided by Public Administrations. The definition of data to be collected and the transmission of the same is, in fact, a process that generally requires a long period of time for an Italian public administration, a time that could hardly be compatible with an ongoing monitoring activity on the implementation of the NRSF.

These critical points were also underlined by several interviewees.⁸⁶

3.6. Assessment of the expected effectiveness and sustainability

Critical issues already highlighted in the chapter are related to:

- Absence or poor implementation commensurate with the specificity of the Italian context of the objectives that each axis aims to achieve through the implementation of the NRSF;
- Description of measures and interventions to be implemented that are not anchored to a precise timetable;
- Inadequate definition of indicators where foreseen (Health and Cultural Promotion) and absence of indicators (Anti-poverty, Education, Employment, Housing);
- Lack of definition of data sources and methodologies to be used for estimating indicators;
- Non-definition of data collection methods, in particular, the data to be provided by public administrations

These risk undermining or weakening the effectiveness of interventions because they do not allow for adequate ongoing monitoring of planned measures.

In addition to these critical points, there are also those derived from the legal nature of the NRSF which, being a soft law instrument, has no binding capacity, leaving in fact to the free initiative of local authorities (regional authorities and municipal authorities) the possibility of implementing or not the planned measures. In fact, no sanctioning mechanisms are foreseen for local authorities that decide not to implement the activities or that put in place interventions in clear contrast with what has been foreseen.

A further possible criticality could derive from the fact that the budget that will be used for the implementation of measures and interventions is not defined and allocated with respect to the interventions. Moreover, in many cases, given the nature of the financing channels foreseen, the possibility of identifying a specific budget for the implementation of interventions is left to the autonomous initiative of the local authorities. The latter may provide or not budget shares to be used for the implementation of activities aimed at

⁸⁶ See interviews with: *Sucar Drom*, 21 February 2022; *UCRI*, 14 March 2022; *ERRC*, 1 March 2022.

inclusion and participation of Roma and Sinti or, even if provided, may then decide to use that budget for different actions.

This is far from being a hypothesis, given that in the last decade several Italian Metropolitan Cities (see for example the case of Catania, Messina, and Bari)⁸⁷ have significantly reduced shares of funds from the PON Metro initially allocated for activities of inclusion of Roma communities or have allocated these sums to other activities.

⁸⁷ In 2018, the Municipal Administration of Messina has allocated to other social inclusion activities the sum of approximately 1.5 million EUR originally allocated for the 'Roma Empowerment' project. In 2020, the Municipal Administration of Catania halved the amount originally allocated to finance the project called *Fuori Campo* (Outside the settlement). In 2019, the Municipal Administration of Bari has allocated the sum of approximately 150,000 EUR to finance micro-entrepreneurship projects also from the Roma population on other projects.

4. ALIGNMENT WITH THE EU ROMA STRATEGIC FRAMEWORK

4.1. Reflecting diversity among Roma

Italy is characterised by a strong fragmentation of the Roma and Sinti communities.⁸⁸ The socio-economic conditions between and within the different groups are different, as are the housing conditions enclosed in a range that includes, in its extremes, families in housing emergency characterised by transnational mobility and those of ancient settlement, rooted for centuries on the same territory.

As recognised in the NRSF itself, Italy counts on a “reduced availability of scientifically reliable socio-demographic and economic statistical information on the Roma and Sinti population”⁸⁹ and this contributes “to making it difficult to identify the problems affecting the life conditions of part of this heterogeneous group of citizens”.⁹⁰

The official statistical data collected periodically cannot be disaggregated by ethnicity. “These are the limits imposed by the law. The data we have are therefore the data that photograph the discomfort and unfortunately, we have this limit”.⁹¹

The consequence is that the only quantitative and qualitative data are almost always exclusively referred to communities that can easily be classified as Roma or Sinti because from the housing point of view, they are located in a mono-ethnic settlement and, therefore, in a condition of serious socio-economic fragility.⁹² Within them, there is a minority component of some of the 22 communities present on the national territory. The NRSF pays the price for this cognitive deficit with the consequence that “it manages to take very little interest in those groups that pass through Italy from Eastern Europe”,⁹³ inside “the Sicilian walkways we dealt with in the past NRIS are missing”,⁹⁴ and “all people who do not live in large cities are not considered, with the consequence that many people have been excluded”.⁹⁵

Therefore, starting from an initial little known, extremely partial and sectoral framework that includes only small portions of some of the 22 communities present on the Italian territory, it does not promote actions that guarantee the “recognition of the diversity and needs of specific groups within the Roma population”, as recommended in the EU Strategic Framework.⁹⁶

As explored in the previous chapters, the NRSF also shows little attention to the gender issue, to child protection measures, to the rights of the elderly and people with disabilities, and to those experiencing seasonal mobility, subjects marked by multiple discrimination.

⁸⁸ On the different groups, see *Associazione 21 luglio, L'esclusione al tempo del Covid* (Exclusion in the time of Covid), Roma, 2021.

⁸⁹ NRSF, p. 13.

⁹⁰ Ibid.

⁹¹ Employee in the National Statistical Institute, 8 March 2022.

⁹² With regard to these housing models, inhabited by less than 20,000 people, the following should be noted: formal and informal outdoor settlements, some residential areas, Roma collection centres. See www.ilpaesedeicampi.it

⁹³ Expert in the area of the Roma education, 22 February 2022.

⁹⁴ ERRC, 1 March 2022.

⁹⁵ Representative of *Sucar Drom*, 21 February 2022.

⁹⁶ European Commission 2020, *EU strategic Framework for Roma for Equality, Inclusion and Participation*, Brussels, p. 3.

One chapter of the NRSF is related to the development of the statelessness issue, where, especially in relation to Roma children, the measures taken are particularly weak.

4.2. Combining mainstream and targeted approaches

The NRSF, following the indications reported in the EU Strategic Framework,⁹⁷ repeatedly mentions the need to promote actions “marked by a combined mainstream approach with explicit but not exclusive target groups”⁹⁸ and its approach promotes this virtuous combination.

However, the text does not mention the phenomenon, rooted in some Italian cities, according to which access to ordinary services is hindered by municipal structures of social assistance reserved on an ethnic basis,⁹⁹ which promote forms of support for Roma and Sinti communities parallel to those provided for ordinary citizens, accentuating, despite themselves, disparities in the form of service provision. It is, therefore, necessary to discourage local target-based interventions based on an ethnic vision, strengthening instead the ordinary chain of services, providing investments and reforms that strengthen the field of welfare policies.

4.3. Usage of instruments introduced by the Council Recommendation

The EU Strategic Framework for Roma for Equality, Inclusion and Participation provides that the following are guaranteed: significant participation of Roma in all decision-making; empowering and strengthening the capacities of Roma, civil society and public authorities, building trust among stakeholders and between Roma and non-Roma communities; promoting the political, economic and cultural commitment of the Roma. To facilitate the achievement of these objectives, the framework indicates a series of actions including the promotion of a reform of the European Roma Platforms to make them more representative for the national Roma population, extending them to new realities and exploiting the potential of social innovation.

In addition, to encourage the active involvement of women and young people, it provides for the election of a platform representative to ensure transnational networking between national and European Roma platforms, offering young Roma internships or junior positions in national structures linked to the implementation of the Roma Platforms.

Consistently with the EU guidelines, the NRSF promotes the strengthening of the role and functioning of the Platform and the Forum in terms of active participation of Roma and Sinti in consultative and decision-making processes, also in terms of representation and representativeness.

Still, in line with the European strategic framework, the following proposals are placed: promoting the participation of young Roma and Sinti people involved by associations in empowerment and training courses in thematic subgroups; guaranteeing the financing of the functioning of the Platform and the Forum with national and European resources; promote the capacity building of civil society; apply a bottom-up methodology to encourage active participation in the monitoring of national strategies; encourage the

⁹⁷ “In the NRSF, mainstreaming and explicit but not exclusive targeting should be combined, ensuring that mainstream services are inclusive and providing targeted and additional support to promote effective and equal access of Roma to rights and services”, p. 7.

⁹⁸ NRSF, p. 43.

⁹⁹ In some Italian cities, for decades, there have been municipal structures that provide social services reserved exclusively for people identified as Roma and Sinti because they are registered in mono-ethnic settlements. Among them, Naples, with the *Ufficio Rom e Patti di Cittadinanza* (Roma Office and Citizenship Pacts); Rome, with the *Ufficio Scolarizzazione Alunni Rom* (Roma Pupil Schooling Office); Turin, with the *Ufficio Servizio Nomadi* (Nomad Service Office); Latina, with the *Area Nomadi* (Nomad Area); *Trescore Balneario*, with the *Ufficio Campi Rom* (Roma Settlements Office); Asti, with the *Sportello Stranieri e Nomadi* (Foreigners and Nomads Desk).

participation of Roma and Sinti communities in the political activities of territorial and local institutions; promote exchange with other European participatory models.

With reference to the guarantee of funding the Platform and the Forum with national and European resources, however, we note the lack of a reference to the adoption of a plan aimed at providing regular support for strengthening the capacities of local civil society.

As regards the linguistic-cultural aspects, the NRSF provides for a concrete involvement of the Roma and Sinti communities in the consultation for the resolution of critical issues on the territories, favouring their inclusion in decision-making and co-programming and co-planning mechanisms. However, there is a lack of specific references regarding the adoption of a plan to involve more Roma professionals as mediators, which would help overcome the persistent lack of trust between Roma and non-Roma communities.

Finally, as indicated by the contact person of ERRC interviewed¹⁰⁰ and by the representative of *Chi rom e chi no*,¹⁰¹ we note the scarce attention paid to the active participation of women, who play a central role within the Roma communities in terms of connection with institutions (schools, services, etc.) and with the civil society. From this point of view, the empowerment of Roma women is fundamental and specific measures should have been envisaged in this regard.

¹⁰⁰ See Interview with a representative of ERRC, 1 March 2022.

¹⁰¹ See Interview with a representative of *Chi rom e chi no*, 1 March 2022.

CONCLUSIONS AND RECOMMENDATIONS

On the one hand, the NRSF seems to confirm some structural limits that in the past have severely limited its effectiveness; on the other hand, it does not seem to give adequate answers to critical issues already highlighted in the past NRIS; lastly, it marks elements of discontinuity, making significant leaps in quality in some areas.

It should be remembered that the NRCP, responsible for drafting and coordinating the NRSF, unlike what happens in other countries, is placed directly under the Italian Government and this could potentially compromise its freedom of action and independence. The NRSF also contains a structural weakness dictated by its legal nature: it has no binding capacity - leaving the possibility of implementing or not implementing the planned actions to the free initiative of the local authorities - and it does not provide for a budget specifically intended for the implementation of the planned actions. Finally, compared to the past NRSF, which was approved on 24 February 2012 by the Council of Ministers at the proposal of Minister Andrea Riccardi, it appears to be a politically weak document, having been adopted by a simple administrative act signed by the Director of UNAR.

In the current NRSF, the demands of communities experiencing extreme housing exclusion, the female component - for which specific empowerment actions are not considered - and minors, regarding whom a specific chapter dedicated to their protection is absent, are not adequately taken into account.

Another criticality is linked to the method: the objectives established by the Council Recommendations are not inclined to take into account the specificities of the Italian context.

Positive elements of discontinuity with respect to the past NRIS concern: the effort, in the drafting phase, of the NRCP to have tried to ensure the activation of consultation and participation processes by expanding, compared to the past, the audience of stakeholders and opening up to the possibility of greater exchange of information and contributions; the emphasis given to antigypsyism as a transversal key to all actions; the multiplicity of educational interventions, some with an innovative character.

Recommendations to national authorities

1. The Italian Government should intervene to ensure the total independence of the Anti-Racial Discrimination Office from the executive power, as well as the consolidation and strengthening of its competences, providing it with the resources and powers necessary to finance actions foreseen within the NRSF.
2. The NRCP, in the context of actions aimed at overcoming mono-ethnic settlements, should take into consideration not only the formal open-air settlements, commonly referred to as 'Roma camps' or 'Sinti camps', but also informal settlements and residential areas created by public authorities and with a strongly mono-ethnic character that insist on the national territory, drawing up, by 2024, specific intervention guidelines for overcoming them.
3. It is recommended that the NRCP develops by 2024 specific operational methodologies, listening campaigns and forms of active participation within the Roma and Sinti communities present in the formal and informal settlements with the aim of promoting the empowerment of female component.
4. It is recommended that the national government follows up the directorial decree signed by the Director General of the UNAR with approval of the NRSF by the Council of Ministers by the end of 2022.

5. The NRCP is recommended to deal with the problem of early marriages in the Forum and the Platform in 2023 and 2024 in order to draw up, in agreement with the two bodies, guidelines to guarantee the protection of children's rights on the issue.
6. Define an expected value for each quantitative indicator and explain the methodologies with which to estimate the indicator (for example: carrying out surveys and analysis of available data sources). Immediately define, by preparing the appropriate protocols, how the public administrations and other bodies will have to provide useful data for monitoring the implementation of the NRSF.
7. It is recommended that the NRCP promote by 2024 the creation of a legal task force that offers legal support to municipal administrations to heal conditions of statelessness risk encountered in its territory.
8. The NRCP is recommended to promote by 2024 a synergistic action with the Ministry of Education, University and Research, the Ministry of Health and the Ministry of the Interior so that the school support interventions that affect minors present in formal and informal settlements are structured in a multidimensional way, guaranteeing, in addition to the right to education, the fundamental rights of children enshrined in the Convention on the Rights of the Child and Adolescent.

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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 problem	identified and analysed sufficiently	adequate but with room for improvement	some targets but not relevant
Prejudice against Roma	critical problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Hate crimes against Roma	minor problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Hate speech towards and against Roma (online and offline)	significant problems	understood with limitations	adequate but with room for improvement	some targets but not relevant
Weak effectiveness of protection from discrimination	significant problems	irrelevant	absent	absent
Segregation in education, housing, or provision of public services	critical problems	understood with limitations	adequate but with room for improvement	some targets but not relevant
Forced evictions and demolitions leading to homelessness, inadequate housing, and social exclusion	critical problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Statelessness, missing ID documents	minor problems	understood with limitations	present but insufficient	some targets but not relevant
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 free movement	irrelevant	irrelevant	absent	absent

Education

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Lack of available and accessible preschool education and ECEC services for Roma	critical problems	minor problems	present but insufficient	some targets but not relevant
Lower quality of preschool education and ECEC services for Roma	irrelevant	irrelevant	absent	absent
High drop-out rate before completion of primary education	critical problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Early leaving from secondary education	critical problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Secondary education/vocational training disconnected from labour market needs	irrelevant	irrelevant	absent	absent
Misplacement of Roma pupils into special education	irrelevant	irrelevant	absent	absent
Education segregation of Roma pupils	significant problems	mentioned but not analysed sufficiently	absent	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	irrelevant	absent	absent
Limited access to second-chance education, adult education, and lifelong learning	critical problems	understood with limitations	adequate but with room for improvement	adequate but with room for improvement

Limited access to and support for online and distance learning if education and training institutions close, as occurred during the corona virus pandemic	critical problems	irrelevant	absent	absent
Low level of digital skills and competences and limited opportunities for their development among pupils	critical problems	irrelevant	absent	absent
Low level of digital skills and competences and limited opportunities for their development among adults	critical problems	irrelevant	absent	absent

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)	critical problems	understood with limitations	adequate but with room for improvement	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	absent	some targets but not relevant
Risk for Roma women and girls from disadvantaged areas of being subjected to trafficking and forced prostitution	minor problems	irrelevant	absent	absent
Primary labour market opportunities substituted by public	minor problems	irrelevant	absent	absent

work				
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	understood with limitations	adequate but with room for improvement	some targets but not relevant
Poor supply/availability of healthcare services (including lack of means to cover out-of-pocket health costs)	minor problems	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	significant problems	understood with limitations	adequate but with room for improvement	some targets but not relevant
Poor access to preventive care (vaccination, check-ups, screenings, awareness-raising about healthy	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant

lifestyles)				
Poor access to sexual/reproductive health care and family planning services	minor problems	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 health care (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

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

Limited or absent public waste collection	critical problems	irrelevant	absent	absent
Restricted heating capability (families unable to heat all rooms/all times when necessary) or solid waste used for heating	minor problems	irrelevant	absent	absent
Lack of security of tenure (legal titles are not clear and secure)	critical problems	mentioned but not analysed sufficiently	absent	absent
Lacking or limited access to social housing	minor problems	irrelevant	absent	absent
Overcrowding (available space/room for families)	significant problems	mentioned but not analysed sufficiently	absent	absent
Housing-related indebtedness at levels which may cause eviction	minor problems	irrelevant	absent	absent
Housing in segregated settlements/ neighbourhoods	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Housing in informal or illegal settlements/ neighbourhoods	significant problems	irrelevant	absent	absent
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	irrelevant	absent	absent
Limited or lacking internet access (e.g., public internet access points in deprived areas, areas not covered by broadband internet)	minor problems	irrelevant	absent	absent

Limited or lacking access to green spaces	minor problems	irrelevant	absent	absent
Roma excluded from environmental democracy	critical problems	irrelevant	absent	absent
A poor adherence at the local level to both principles and objectives of the National Strategy	critical problems	irrelevant	absent	absent
Ghetto housing conditions experienced for several decades by ancient Romani communities present above all in the Abruzzo Region and the Calabria Region	critical 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	minor problems	irrelevant	absent	absent
Income support programmes fail to guarantee an acceptable level of minimum income for every household	minor problems	irrelevant	absent	absent
Limited access to income support schemes (low awareness, barrier of administrative burdens, stigma attached)	minor problems	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)	minor problems	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	irrelevant	irrelevant	absent	absent
Risk of municipalities misusing income support to buy votes	irrelevant	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	mentioned but not analysed sufficiently	absent	absent
Limited access to social services: low awareness of them, low accessibility, (e.g., due to travel costs) or limited availability	significant problems	irrelevant	absent	absent
Services providers do not actively reach out to those in need	significant problems	irrelevant	absent	absent
Limited ability of social services to effectively work together with other agencies (e.g., public employment service) to help clients	minor problems	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)	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	critical problems	irrelevant	absent	absent
Specific vulnerability of Romani children as victims of violence not considered	significant problems	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	critical problems	mentioned but not analysed sufficiently	absent	absent
Illegal practices of child labour	minor problems	irrelevant	absent	absent
Large-scale and discriminatory placement of Romani children in early childhood care institutions	minor problems	irrelevant	absent	absent
Persistence of large-scale institutions rather than family-type arrangements	minor problems	irrelevant	absent	absent
Early marriages	critical 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	irrelevant	irrelevant	absent	absent
Inadequate child/adolescent	critical problems	irrelevant	absent	absent

participation				
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Promoting (awareness of) Roma arts, culture, 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	some targets but not relevant
Exclusion of Roma communities from national cultural narratives	significant problems	irrelevant	absent	absent
Romani history and culture not included in school curricula and textbooks for both Roma and non-Roma students	significant problems	mentioned but not 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	minor problems	mentioned but not 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	minor problems	understood with limitations	present but insufficient	some targets but not relevant

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