



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

**Prepared by:**  
Foundation Jaw Dikh  
*April 2022*



*Justice  
and Consumers*

**EUROPEAN COMMISSION**

Directorate-General for Justice and Consumers  
Directorate D — Equality and Union Citizenship  
Unit D1 Non-Discrimination and Roma Coordination

*European Commission  
B-1049 Brussels*

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

**EUROPE DIRECT is a service to help you find answers  
to your questions about the European Union**

Freephone number (\*):  
00 800 6 7 8 9 10 11

(\* ) The information given is free, as are most calls (though some operators, phone boxes or hotels may charge you)

**LEGAL NOTICE**

“The European Commission support for the production of this publication does not constitute endorsement of the contents which reflects the views only of the authors, and the Commission cannot be held responsible for any use which may be made of the information contained therein”.

More information on the European Union is available on the Internet (<http://www.europa.eu>).

Luxembourg: Publications Office of the European Union, 2022

Print	ISBN	XXX-XX-XX-XXXXX-X	doi:	XX.XXXX/XXXXXX	Catalogue number	XX-XX-XX-XXX-EN-X
PDF	ISBN	XXX-XX-XX-XXXXX-X	doi:	XX.XXXX/XXXXXX	Catalogue number	XX-XX-XX-XXX-EN-X

© European Union, 2022  
Reproduction is authorised provided the source is acknowledged.

The report was prepared by Foundation Jaw Dikh, Elżbieta Mirga-Wójtowicz and Andrzej Mirga, with the cooperation of The Central Council of Roma in Poland – Advisory and Information Centre for Roma, and Monika Szewczyk, PhD candidate at the Doctoral School in Social Sciences at Jagiellonian University.

The report was prepared as part of the initiative “**Preparatory Action – Roma Civil Monitoring – Strengthening capacity and involvement of Roma and pro-Roma civil society in policy monitoring and review**”, implemented by a consortium led by the Democracy Institute of Central European University (DI/CEU), including the European Roma Grassroots Organisations Network (ERGO Network), the Fundación Secretariado Gitano (FSG) and the European Roma Rights Centre (ERRC). The initiative was funded by the European Commission’s Directorate-General Justice and Consumers (DG Just) within service contract no. JUST/2020/RPAA/PR/EQUA/0095.

The report represents the findings of the authors, and it does not necessarily reflect the views of the consortium or the European Commission, who cannot be held responsible for any use which may be made of the information contained therein.



# CONTENTS

<b>LIST OF ABBREVIATIONS</b> .....	6
<b>EXECUTIVE SUMMARY</b> .....	7
<b>INTRODUCTION</b> .....	9
<b>1. PARTICIPATION</b> .....	10
1.1. Roma participation in the NRSF preparation .....	10
1.2. 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.....	12
1.5. Capacity-building of Roma civil society .....	12
<b>2. RELEVANCE</b> .....	14
2.1. Fighting antigypsyism and discrimination.....	14
2.2. Education .....	14
2.3. Employment .....	15
2.4. Healthcare.....	17
2.5. Housing, essential services, and environmental justice .....	17
2.6. Social protection.....	18
2.7. Social services .....	20
2.8. Child protection .....	20
2.9. Promoting (awareness of) Roma arts, culture, and history .....	22
<b>3. EXPECTED EFFECTIVENESS</b> .....	23
3.1. Responsibility for NRSF coordination and monitoring .....	23
3.2. Quality of the plan .....	24
3.3. Funding 24	
3.4. Monitoring and evaluation.....	25
3.5. Assessment of the expected effectiveness and sustainability .....	26
<b>4. ALIGNMENT WITH THE EU ROMA STRATEGIC FRAMEWORK</b> .....	27
4.1. Combining mainstream and targeted approaches.....	27
4.2. Usage of instruments introduced by the Council Recommendation .....	28
<b>CONCLUSIONS AND RECOMMENDATIONS</b> .....	29
<b>REFERENCES</b> .....	30
<b>ANNEX: LIST OF PROBLEMS AND CONDITIONS</b> .....	32

## LIST OF ABBREVIATIONS

LGU	Local Government Unit
MSWiA	Ministry of the Interior and Administration ( <i>Ministerstwo Spraw Wewnętrznych I Administracji</i> )
NEET	Not in Education, Employment, or Training
NGO(s)	Non-Governmental Organisation(s)
NIK	Supreme Audit Office ( <i>Najwyższa Izba Kontroli</i> )
NRSF	National Roma Strategy Framework
NRCP	National Roma Contact Point
OMC	Open Method of Coordination
PIS	<i>Prawo i Sprawiedliwość</i>

## EXECUTIVE SUMMARY

There is continuity and political will in the allocation of resources to Roma projects in the 'Programme for Social and Civic Integration of the Roma Community in Poland for 2021-2030'. The Polish Roma Programme prioritises education and housing.

The major weakness of the 'Programme for Social and Civic Integration of the Roma Community in Poland for 2021-2030' lies in the way it seeks to explain Roma 'marginalisation' as a result of practices associated with 'Roma culture'. The Roma themselves (or their culture) is found guilty, and the aim of the Programme is to better *integrate* Roma into Polish society. The Programme infers that all the issues Roma are facing, including discrimination, are a result of a lack of education among the Roma. However, it admits that Roma inclusion is not possible without the active engagement of state institutions in combating antigypsyism and discrimination in all policy areas – i.e., making Polish society *inclusive* for Roma.

### Participation

Roma participation in the development of the Programme has been rather limited or non-existent. There was no proper consultation at the beginning of the Programme drafting and Roma participation is not foreseen in the implementation, monitoring, and evaluation of the Programme. Not financial support is dedicated to empowering Roma at the grass-roots level to adequately equip them to participate in social and political processes.

The process of consultation and participation of Roma NGOs at every stage of the Roma Programme should be ensured and strengthened. Additionally, Roma organisations should be strengthened in terms of the community building of their social and political capital.

### Relevance

The Programme does not cover all sections as stipulated in the EU Roma Framework and the Council Recommendation. It focuses on education and housing only, while other areas where Roma face racism and exclusion – such as healthcare and employment – are omitted. The term "antigypsyism", although central in the new framework, is not even mentioned in the text, while the notion of discrimination is downplayed or left for the Ministry of Justice or Police to deal with (their role is limited to monitoring and data collection).

The fight against antigypsyism and discrimination should become an integral part of the programme and an area of support, along with consultations at local and regional levels and proper diagnosis of the causes of problems. The outcomes of such consultation processes must form the basis on which local authorities can build local strategies together with the active participation of Roma.

### Expected effectiveness

Expected effectiveness is low, especially as regards the role and involvement of Roma and the extent to which the population of Roma will benefit from the proposed measures, which are not defined clearly. Despite early efforts to integrate the Roma in Poland and secure financing for them (since the time of the 'Pilot' Programme for the Malopolska region in 2001) the outcomes of the previous programme have not been not significant, and the current Programme has stagnated as it continues to propose similar activities to previous ones, with little adaptation to the new context. While the new Programme includes indicators and targets in some areas, they are not always clear and are rather unrealistic.

There has been little use of good practices from other countries (the 'open' method of coordination, for example, involving unemployment offices). Many Roma leaders are critical of the idea of the "innovative" projects mentioned in the Programme and remain unconvinced of its merits. The regional or provincial commissions that evaluate projects,

in any case, decide to support less ambitious or routine projects, while Roma leaders and experts (very few) have no way of influencing such decisions. Thus, the programme will repeat previous mistakes, and the situation of Roma will not improve significantly. An important aspect of the Programme remains its financing. This is based mainly on state budgetary funds (special purpose reserve) and in this sense it is sustainable.

#### Alignment with the EU Roma Strategic Framework

Diversity among Roma in Poland is recognised, but the Programme does not devote sufficient space to it. The Programme makes no use of instruments introduced by the Council Recommendation, especially with regard to “strengthen[ing] the measures taken against hate speech, hate crime and violence directed against Roma people”. In fact, the Programme maintains that there is not much interest in those measures among the Roma.

# INTRODUCTION

## *National Roma strategic framework*

The governmental 'Programme for Social and Civic Integration of the Roma Community in Poland for 2021-2030' (hereinafter 'the Programme 2021-2030')<sup>1</sup> is a continuation of earlier programmes. The first Programme 2004-2013 covered a number of different areas (including anti-discrimination issues, although through the perspective of police work) and had funding from the state budget. Funding from the state budget was continued in the second Programme 2014-2020 and is for the current one, which may be underlined here.

The parliamentary election of 2015, however, brought to power a right-wing coalition led by the Law and Justice (PiS) party. The new establishment did not significantly change how the already adopted Programme 2014-2020 has been implemented. Gradually, however, it managed to introduce more centralisation<sup>2</sup> in terms of its application which, in practice, has limited dialogue and consultation with the Roma community and their organisations.

In comparison with previous Programmes, the most recent one, while it did not fully consult Roma organisations and their leaders and experts (more details below), may be regarded as more elaborate and sophisticated. The views of some Roma experts who were interviewed with regard to the Programme are positive overall; however, it is weak regarding the details. For example, there is a lack of detailed coverage of areas requiring change such as culture, combating antigypsyism, addressing unemployment, activities aimed at building social capital and the participation of Roma and Roma activists. This report focuses on the details of the Programme analysed critically and in relation to the '2020-2030 EU Roma Strategic Framework', and the '2021 Council Recommendation for Roma Equality, Inclusion and Participation'.

## *About this report*

The assessment report is based on interviews with Roma leaders and experts, as well as with relevant authorities, desk inquiry including diverse policy documents and reports on the implementation of the Roma Programmes, and the previous 'Roma Civil Monitor' (RCM) reports developed by the Jaw Dikh Foundation within the RCM 2017-2020 pilot project.

In total, five Roma leaders of Romani organisations, and six Roma experts (mediators or members of the voivod commissions that assess projects for the Roma community to be financed from the Programme) were interviewed. Additionally, the following public institutions were targeted for interviews:

- Ministry of Interior and Administration (responsible for the Programme);
- Ministry of National Education;
- Ombudsman of Citizens Rights.

When an interviewee is quoted in this report, reference to their number is provided – please see the list of interviewees appended to the report.

---

<sup>1</sup> Available in English at:  
[https://ec.europa.eu/info/sites/default/files/programme\\_of\\_roma\\_integration\\_2021-2030.pdf](https://ec.europa.eu/info/sites/default/files/programme_of_roma_integration_2021-2030.pdf)

<sup>2</sup> See: [Dwa lata dobrej zmiany: Centralizm państwowy w praktyce](#) (Two Years of Good Change: State Centralism in Practice), 31 September 2017.

# 1. PARTICIPATION

## 1.1. Roma participation in the NRSF preparation

The Programme 2021-2030 was drafted by the Ministry of the Interior and Administration (MSWiA), specifically by only one person responsible for the Roma agenda, and consultations were held after, mostly with a number of state actors.

Roma participation consisted only of a few consultations about the draft Programme within the frame of the 'Joint Commission of the Government and National and Ethnic Minorities',<sup>3</sup> in which Roma are represented by two people<sup>4</sup> and in informal discussions with a few leaders of Roma civil society.<sup>5</sup> Consultations were not held with the Commissions' Roma Team – which is mentioned by the Programme as an achievement, and in which representatives of some 20 Roma organisations are registered as members – because it met last time in 2016 and currently is not functioning.<sup>6</sup> Eventually, the draft was sent out to a number of Roma organisations (according to the official list, members of the sub-commission) in an e-mail,<sup>7</sup> but not discussed.

The way the Programme was developed indicates the leading role of the MSWiA or the issue of centralisation. Civil society's views were accepted if they followed the approach of the MSWiA. The role of the Roma community and organisations is considered to be the 'final beneficiary' and, sometimes 'implementer'.

According to the drafter of the Programme, the contribution of Roma organisations was in any case limited – she mentioned receiving only one remark from Roma organisations related to the term 'ghetto'.<sup>8</sup> She also listed calls from Roma school assistants as one possible and necessary means of consultation. In her view, however, Roma leaders and organisations should be more active and apply more pressure, especially on local authorities.<sup>9</sup>

## 1.2. Participation in the NRSF implementation, monitoring, and evaluation

Roma participation in the implementation of the Programme, according to data quoted in the programme content, is constantly rising.<sup>10</sup> In practice, the system of policy consultation, similarly to projects originating with Roma organisations, leads to losses due

---

<sup>3</sup> More on this in: Roma Civil Monitor (2018), [Civil society monitoring report on implementation of the national Roma integration strategies in Poland: Focusing on structural and horizontal preconditions for successful implementation of the strategy](#); see also interviews no. 4 and no. 7.

<sup>4</sup> Roma members of the Joint Commission of the Government and National and Ethnic Minorities have been criticised by the Roma leaders and experts who were interviewed – they are both from the same group of Polska Roma. Informal agreements that the two largest groups of Roma will be represented in the Joint Commission of the Government and National and Ethnic Minorities are not kept – *Bergitka Roma* group lost its representative in the Joint Commission of the Government and National and Ethnic Minorities. According to some interviewed Roma, such representatives should stay in position only for a limited period (4 to 5 years) and be young and educated (interview no. 7).

<sup>5</sup> Interview no. 4.

<sup>6</sup> Interviews nos. 4 and 7.

<sup>7</sup> Most of the Roma who were interviewed remember that they received e-mails with the draft.

<sup>8</sup> Interview no. 2.

<sup>9</sup> Interview no. 2.

<sup>10</sup> Programme 2021-2030, p.32. Data quoted was provided by the BORIS organisation who assessed the previous Programme. Report available at: <http://mniejszosci.narodowe.mswia.gov.pl/mne/romowie/program-integracji-spol/11251,Raport-z-ewaluacji-Programu-romskiego-2014-2020.html>.

to competition with non-Roma institutions and organisations, which have much greater social and human capital. Some Roma organisations are tired of seeing the Programme stagnate and implementing actions that are of interest to some institutions but not beneficial for Roma.<sup>11</sup>

The largest part of the Programme is being implemented by local authorities, especially in the areas of education and housing. Local authorities are also usually able to implement such projects for Roma because they have the capacity to contribute with their own funding; the Programme mentions a 15% allocation of such funding (the 'own contribution' to LGU projects is 15%).<sup>12</sup> Local authorities are also recipients of state funding for minority children's schooling through an increase in the educational subsidy (in general, if the school has minority children enrolled, it receives a larger subsidy from the central budget).<sup>13</sup> The ruling coalition requested that these funds are devoted to the improvement of Roma education (there is a possibility to use a subsidy as 15% of the 'own' contribution to a project if this is devoted to education). The Programme promises to influence local authorities in this direction.

The monitoring and evaluation – mid-term and final – of the implementation of the Roma Programmes does not involve Roma experts. The Ministry uses the services of experts and organisations who are usually non-Roma. According to the representative of MSWiA who was interviewed, such evaluation was done "well".<sup>14</sup> Roma leaders who were interviewed saw this evaluation differently: Roma families who were final beneficiaries often did not understand the questions, and needed help with explaining their meaning.<sup>15</sup> They also did not know if recommendations had been introduced into the new Programme, and if so, which ones.<sup>16</sup>

Activity planned by the Ministry:

*"To increase the scope of Roma participation in decision making processes under this strategy, the Ministry of the Interior and Administration will organise consultation meetings in subsequent years – independently from the above-mentioned entities – financed from the special-purpose reserve, dedicated to the implementation of the Integration Programme for 2021-2030, with the participation of local Roma community representatives and/or Roma implementing bodies/beneficiaries of measures in view of evaluating the effectiveness of measures at [the] local level."<sup>17</sup>*

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

The participation of Roma, in a broad sense, is centrally located in the EU Council Recommendation, together with the fight against antigypsyism and discrimination.

<sup>11</sup> Projects originating in universities often win because they are implemented by highly educated staff, but the latter are typically not close to the final Roma beneficiaries. See also: Interview no. 8; interview no. 9 and interview no. 4.

<sup>12</sup> Programme 2021-2030, p. 70. 'LGUs' own contribution is a further source of Programme financing – [the share thereof] should amount to 15% of the total cost of tasks'.

<sup>13</sup> It is up to the local government to decide which educational tasks these funds will be allocated to, according to locally diagnosed needs (employment of additional teachers, improvement of standard of building, purchase of teaching aids, etc.). See: <http://mniejzosci.narodowe.mswia.gov.pl/mne/prawo/konwencja-ramowa-rady/raporty-dla-sekretarza/-ivrport/10989,IV-Raport-dla-Sekretarza-Generalnego-Rady-Europy-z-realizacji-przez-Rzeczpospoli.html>.

<sup>14</sup> Interview no. 2.

<sup>15</sup> Interview no. 8.

<sup>16</sup> Interview no. 4.

<sup>17</sup> Programme 2021-2030, p. 62

However, there is not much alignment with this approach in the current governmental 2021-2030 Programme in Poland. The participation of Roma in the social, economic, and political life of society is seen by authorities as dependent on the level of education. Since the previous Programmes did not progress much in this area (few Roma have completed secondary education, and even fewer tertiary education), there are very few Roma who can be partners for the government and local authorities.

Participation of the Roma at the voivod or regional level is limited as well; some Roma experts are included in voivod commissions that assess projects (they participate in six out of sixteen such commissions). Their participation experience, however, is negative. According to the Roma experts who were interviewed, they are ignored, they do not have sufficient time to even read the proposals, they receive ready-made protocols that are only to be accepted (the winners are already known), and most of the members of such commissions are from the voivod office clerks (who know each other well).

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

Roma community 'empowerment' does appear in the governmental Programme several times. However, the concept is vaguely understood.

The Programme does not provide any financial support to empower Roma themselves at the grass-roots level. No plans are defined for any annual meetings, the organisation of events, or networking or the opportunity to build coalitions or partnerships. The NRCP does not propose any other tools in the Strategy that are designed to empower Roma communities at the local level.

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

No funds are allocated or earmarked for the capacity-building of Roma organisations in the current Programme. One interviewee expressed the view shared by many Roma civil society leaders that the active Roma organisations (one-quarter or one-fifth of them) usually continue to apply for typical projects that have been carried out for years, such as running day-care centres, festivals, and educational activities for children, which fall within the framework proposed by the MSWiA. Roma organisations have no support<sup>18</sup> or encouragement to come up with more relevant and innovative projects that go beyond the usual pattern, such as conferences, research and publishing, advocacy training run by Roma NGOs, and fighting antigypsyism and discrimination. Such projects are usually refused by the voivod commissions that decide on grants.<sup>19</sup>

For some, *typical projects* mean *the 'folklorisation'* of Roma,<sup>20</sup> while for others it means continuing things they have done in the past that paid off, so they do not see the difference in the design of the last Programme and the current one, and thus the need for adaptation to the current framework, focus, and targets. These *typical* projects are financed<sup>21</sup> in a routine-like manner but their nature does not leave much hope for changing the situation of marginalised Roma communities.

One of the leaders who was interviewed highlighted the relatively small amount of resources available for the Programme: in general, the Ministry financially first supports

---

<sup>18</sup> Interview no. 9, interview no. 4. See also: Programme 2021-2030, pp. 53-54, Chapter: 4.3.1. Area of intervention: Education. It specifies what can be financed but also criticises activities financed in the past; i.e., "Attention must be paid to ensur[ing] that the projects implemented do not perpetuate the stereotype of the Roma as dancers and musicians, even if it is a positive one".

<sup>19</sup> Interview no. 5.

<sup>20</sup> Interview no. 5.

<sup>21</sup> Interview no. 3, interview no. 4.

typical projects, while for more ambitious or *innovative* ones there are no resources<sup>22</sup> left. Regardless, there is a need to develop the capacity of Roma organisations as they have invested significant time in explaining to Roma families or final beneficiaries what the Programme includes and how they can benefit from it.<sup>23</sup> Their role as intermediaries and facilitators is essential in this.

Many Roma organisations, therefore, are frustrated with the original Programme and the prospects of the implementation of the new Programme, and withdraw from participation.<sup>24</sup>

---

<sup>22</sup> Interview no. 7.

<sup>23</sup> Interview no. 9.

<sup>24</sup> Interview no. 7, interview no. 8, interview no. 4.

## 2. RELEVANCE

### 2.1. Fighting antigypsyism and discrimination

The Programme prioritises the area of education, partly housing, and to a small extent also employment. Improvements in these areas, while important, do not suffice to make Roma 'feel part of the majority'.<sup>25</sup> This would require addressing the root causes of the weak performance of Roma children in schools, the overrepresentation of Roma children in special education institutions, and the large proportion of young Roma neither in education, employment or training (NEET). The Programme has failed to incorporate the focus on combating antigypsyism of the EU Framework into concrete measures, therefore any change due to the Strategy's proposals will be minimal. Instead of addressing the problems of racism against Roma in more direct ways, the government (United Right) plans to promote the 'patriotic dimension of civic education'<sup>26</sup> among Roma children and youth. This may be for ideological reasons<sup>27</sup>; through such education, it wants to build among Roma children and youth a 'feeling' of being integrated with the majority<sup>28</sup>. Such a perspective ignores the fact that building such a 'feeling' is a long-term process rooted in a legacy of mutual relationships. Such facts prove that the impact of antigypsyism and discrimination on these relationships is predominant.

The Programme plans to monitor hate speech, hate crime, and ethnic violence based on data provided by the Ministry of Justice and Human Rights Plenipotentiaries associated with the police (regions and central). Discriminatory treatment and monitoring of hate crimes are left in the hands of the Ministry of Justice, Police and Government Plenipotentiary for Equal Treatment of the Ministry of Family and Social Policy.<sup>29</sup> Dealing with discrimination based on race, nationality, or ethnic origin is assigned to the Government Plenipotentiary for Equal Treatment of the Ministry of Family and Social Policy, which since 2020 has been operating within the structures of the Ministry of Family and Social Policy, not, unlike previously, under the Plenipotentiary of the Prime Minister's Office.

### 2.2. Education

Education is the priority area in the current Programme, and according to Roma who were interviewed, is the 'brightest' aspect of the Programme.<sup>30</sup> All interviewees agree with this focus and interviewees consider that Roma education assistants and supporting teachers – to be funded within the Programme – will be useful tools for integration. However, they also point out that these educational professionals have no power to influence issues that are crucial for Roma and their inclusion, or to some extent replace Roma parents in their role.<sup>31</sup>

---

<sup>25</sup> Programme 2021-2030, p. 14.

<sup>26</sup> Programme 2021-2030, p. 14.

<sup>27</sup> See: Dawid Sześciło, [Samorząd–centrum Bilans po trzydziestu latach od odrodzenia się samorządu i pięciu latach nowego centralizmu](#) (Self-government – centre. Thirty years after the rebirth of self-government and five years of new centralism), 19 June, 2020.

<sup>28</sup> Opus cit., p. 14.

<sup>29</sup> Programme 2021-2030, p. 46. 'Hate crime monitoring is carried out, among others, by the National Police Headquarters. Meanwhile, the Ministry of Justice monitors the number of relevant court judgements'

<sup>30</sup> Interview no. 7.

<sup>31</sup> Interview no. 9.

The Programme assumes that “ensuring quality education for Roma children forms the basis for improving the situation of the Roma community”.<sup>32</sup> However, it does not specify how this can be achieved. Instead, it aims to strengthen “civic education [...] in its patriotic dimension”, especially in relation to Roma children and youth.<sup>33</sup> A legitimate question is how this kind of educational goal will support the employment of Roma youth. The Programme provides no answer.

A significant number of Roma children do not progress as expected, and a number of them drop out or find themselves in special schools. The Programme acknowledges that “the majority of Roma pupils do not take their education beyond primary school level (many of whom fail to complete it), and the number of pupils in secondary schools (upper-secondary schools in the previous system) is negligible”.

Education objectives rely heavily on the contribution of Roma education assistants. This assumes the need to provide incentives for local governments to increase the number of assistants employed in localities with a relatively large number of Romani pupils – in particular in large cities, together with more training for supporting teachers (Roma assistants for teachers). The Programme does not cover the responsibilities of Roma parents in any detail. However, the role of Roma parents is prime in this regard and is directly related to the quality of education and the achievements of Roma pupils in school. Parents need the support provided by Roma education assistants/mediators to develop their parenting skills and capacities to support their children’s educational efforts from early to primary education and beyond. The Council Recommendation from 2021 devotes attention to Roma parents. Their roles and responsibility cannot be easily replaced by Roma education assistants/mediators.

Scholarship schemes and education subsidies are to be considered *systemic*: that is, functioning independently of the Programme. In fact, mainstream policies aimed at supporting students are of marginal use to the Roma because of the insignificant number of those who successfully reach secondary and tertiary education – for whom the scholarships are available.

Considering the political narrative in Poland about the provision of education subsidies to minorities, it is pivotal to note that the Polish Parliament, dominated by the right-wing coalition, has reduced the minority education subsidy for German children. Even though it does not directly impact the education of Roma children, it still suggests the considerable risk that funds will be cut for other minorities as well, including for Roma.<sup>34</sup>

No subsidies for Romani language teaching are awarded in the case of the Roma minority; local authorities fund this as they wish (the same applies to subsidies for other purposes not related to Roma education).

### 2.3. Employment

The issue of Roma employment remains critical. Few educated Roma are in stable employment. The majority remain unemployed and the Programme relates this to the level of education achieved by Roma. It diminishes or considers irrelevant the issue of antigypsyism, claiming the responsibility of Roma themselves or their culture:

*“A natural need arises to intensify measures aimed at [the] rapid acquisition and improvement of professional qualifications and support*

<sup>32</sup> Programme 2021-2030, p. 64.

<sup>33</sup> Opus cit., p. 12.

<sup>34</sup> [Opolskie samorzady zaniepokojone decyzja Sejmu o zmniejszeniu srodkow na subwencje oswiatowa](#) (Opole local governments concerned about the decision of the Sejm to reduce funds for the educational subsidy), 2022: “Less funding may mean fewer hours of minority language instruction, less funding for the operation of primarily rural schools, which should be particularly supported in areas with minority populations”.

*for the process of transition from the education system to the labour market, e.g. through vocational education. This is crucial with regard to a group in which tradition dictates that families should be started at a relatively young age, so [the] rapid acquisition of vocational education will allow for gaining professional qualifications [thereby] enabling economic independence.”<sup>35</sup>*

The Programme expects that the issue of employment will be resolved automatically if education, especially, secondary education, is ensured or effective; accordingly, those who obtain an education will obtain employment. However, the main problem does not lie in the low level of education but in the discrimination involved in accessing the labour market. As written in the RCM Report 2019:

*“According to the latest 2011 census data, 29.2 per cent of Roma in Poland were [of] pre-working age (up to 17 years old), compared with 18.9 per cent among the general population. At the same time, the level of unemployment among Roma at a working age (18-64) was around 84 per cent compared with 11 per cent among the general population. Since then, little has changed regarding the level of unemployment among Roma, whereas among Poles it [...] significantly dropped to [...] 5.8 per cent in the third quarter of 2018.”<sup>36</sup>*

The previous Programme demonstrated that the cost attached to employing one Roma exceeds the benefits of such employment. The ‘Operational Programme Knowledge Education Development’ (OP KED/PO WER) programme, with a total allocation of 9 million EUR,<sup>37</sup> did not help. Out of 2,056 Roma who received support from supported projects, only 359 Roma found employment.<sup>38</sup> The Programme itself recognises that

*“at the local level, not a single case of synerg[etic] effects was noted between the OP KED projects and the measures of the Integration Programme for 2014–2020, which would amount to a local Roma integration policy; this is due to, among other things, [to local governments’] limited interest in improving the situation of the Roma”.<sup>39</sup>*

Examples from the UK prove that many Roma who emigrated there found employment<sup>40</sup> without the need for subsidies or organising costly training schemes. Endless training for Roma seeking employment may help those who give the training (through projects supported by the EU) but not necessarily the Roma themselves.<sup>41</sup> If authorities plan to support similar projects to earlier programmes (and this seems to be the case), the issue of unemployed Roma, including young Roma, will not be solved.

---

<sup>35</sup> Opus cit., p. 36.

<sup>36</sup> : Roma Civil Monitor, 2019, p. 12

<sup>37</sup> 1 EUR= 4.6244 PLN, 1 PLN = 0.2162 EUR

<sup>38</sup> Opus cit., p. 33. See also: Ocena wsparcia skierowanego do społeczności romskiej w Polsce z PO WER oraz innych programów realizowanych na rzecz Romów. Raport końcowy (Assessment of support for the Roma community in Poland from the OP KED and other programmes implemented for the Roma. Final report) 2019, pp. 89-90. “It was not profitable for employers to hire as they could take advantage of subsidised forms and accept new interns. So, while internships are useful at the individual level, at the macro level they can be an obstacle [to] achieving employment, especially in its stable form”.

<sup>39</sup> Opus cit., p. 38.

<sup>40</sup> Roma Civil Monitor, 2019, p. 15.

<sup>41</sup> Opus cit., p. 15.

## 2.4. Healthcare

Among the Programme's priority areas, healthcare is not listed. The reason is, as the Programme states, that 'contractors showed considerably less interest in tasks related to access to the labour market and healthcare'.<sup>42</sup> In addition, the small Roma minority and their dispersion around the country and urbanisation (92% of Roma live in urban areas) do not make healthcare a significant problem. However, in reality, despite the formal equality of access to healthcare services, civil society considers access to disadvantaged groups, including Roma, as problematic.<sup>43</sup>

The Programme mentions health as one of the educational objectives (such as health prevention or health education; i.e., vaccinations for Roma pupils, prevention programmes aimed at Roma pupils and parents, including addiction prevention, the promotion of healthy lifestyles, healthy nutrition, ecology, sports activities, etc). Due to 'innovative' interventions, the Programme also provides a space for coming up with all kinds of projects that "go [...] beyond the areas of education and housing",<sup>44</sup> including in the area of healthcare.

The Programme relates healthcare issues to the level of education, and since the latter is generally low for Roma, preventive education is also ineffective.<sup>45</sup> In reality, antigypsyism is also manifest in this area. Many families encounter significant healthcare problems which are not countered with find solutions and support within the Programme.<sup>46</sup>

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

The Programme's assessment of the housing situation in Poland is, in general, adequate.<sup>47</sup> However, ignoring the majority's attitudes to the Roma, as expressed fully in the notion of *antigypsyism*, weakens this explanation, especially if non-Roma do not wish to have Roma families as neighbours.<sup>48</sup> Hence, the issue of segregation in housing appears to be strong and visible among certain Roma families – such as the *Bergitka Roma* group in the villages and cities of southern and western Poland.<sup>49</sup>

<sup>42</sup> Opus cit., p. 20

<sup>43</sup> Roma Civil Monitor, 2019, p. 24

<sup>44</sup> Opus cit., p. 55. See also: Interview no. 2.

<sup>45</sup> Interview no. 7. The interviewee mentioned the issue of accessing healthcare system for adult Roma and only thanks to support received from a foundation was it possible to provide healthcare to older Roma.

<sup>46</sup> See also: Roma Civil Monitor, 2019, p. 23.

<sup>47</sup> Programme 2021-2030, p. 55: "The situation of groups living in the southern and western regions of Poland, especially in mountainous areas, remains the worst. Several factors contribute to this group's housing problem – the persistent housing deficit in Poland in general, the significant shortage of communal and social housing, the lack of stable income in Roma households enabling the purchase of a flat (or obtaining a loan), the multi-generational character and large size of Roma families, which affects housing densities and quicker appearance of successive generations".

<sup>48</sup> See: [NIK: Program integracji społeczności romskiej nie jest skuteczny](#), 31 maja 2017; also: Interview no. 9.

<sup>49</sup> Roma Civil Monitor, 2019, p. 21. See also: Działania Rzecznika Praw Obywatelskich na rzecz mniejszości romskiej w województwie małopolskim (Activities of the Human Rights Defender for the Roma minority in the Małopolskie Voivodeship), Warszawa 2014, available at: <https://bip.brpo.gov.pl/sites/default/files/Romowie.pdf>; and: A. Gołębiowski A. M. Basak (eds), *Pomoc społeczna wobec wybranych kategorii podopiecznych* (Social assistance for the selected categories of insiders), Radom 2012, p. 188. "Ogólnie sytuacja mieszkaniowa i materialna Romów jest bardzo trudna. Ro mowie mieszkają w większości w mieszkaniach komunalnych (stan techniczny tych lokali jest różny)" ("Overall, the housing and material situation of Roma is very difficult. Most of the people live in council flats (the technical condition of which varies)", available at: <https://docplayer.pl/9488215-Pomoc-spoeczna-wobec-wybranych-kategorii-podopiecznych.html>

The Programme limits measures to supporting renovation-related tasks or renting and constructing new social houses. Moreover, it does not provide an action plan and clear targets regarding improving housing conditions for Roma. Instead, it foresees one indicator: the number of Roma covered by housing interventions: this target indicator to be achieved in 2030 (5,000). This causes more confusion than clarity – Roma are targeted for housing intervention but there is an obligation to include non-Roma neighbours as beneficiaries of housing projects. The Programme indicates that the measures “cannot perpetuate mutual isolation between the Roma and the local community and cannot lead to local social tensions”. In other words, the various attitudes of both the Roma and non-Roma communities and housing issues and living in the same areas are recognised by the Strategy. However, examples of such tension have been numerous in the past<sup>50</sup> and are visible nowadays.<sup>51</sup>

The Programme claims to support families “living in [the] poorest housing conditions characterised by readiness for integration and fulfilment of civic duties (e.g. children’s obligation [to attend] compulsory education, [and] payment of housing charges), where at least one member of the family is professionally active”.<sup>52</sup> Thus, it makes such support conditional upon the socioeconomic situation or culture of the Roma, which contradicts the very purpose of housing provision for those in need.

On the other hand, it aims to activate local government units (LGUs) “to participate effectively in the Integration Programme for 2021-2030”.<sup>53</sup> The LGUs, especially those run by the opposition, are seen as entities that benefit from state pressure and guidelines. Based on data from the first and second Programmes, the LGUs implemented most of the projects in the area of education and housing.

Issues of environmental justice are not tackled at all in the Programme, although problems such as a lack of or inadequate sewage systems, especially in southern Poland, are visible and recognised.

## 2.6. Social protection

The current Programme does not make social protection a priority area. It says that “instead of actions in the scope of social assistance (as previously) it focuses primarily on strengthening structural mechanisms”.<sup>54</sup> The programme introduces a conceptual difference between social protection and social assistance. While ‘social protection’ refers to specifically targeted programmes for the Roma population, ‘social assistance’ describes universal state programmes for ensuring minimum incomes, such as 500+, Good Start and Mama 4+. The diagnosis offered by the Programme claims that the former (targeted programmes) are often ineffective and generate bias, including reinforcing antigypsyism, while the latter (universal schemes) have been successful at helping Roma families climb above the poverty threshold. However, no evidence is provided to support this claim.

Contrary to this statement, the Programme itself acknowledges that “the legal, organisational and financial mechanisms introduced since 2001 did not bring about a

---

<sup>50</sup> A. Mirga, Romowie – proces kształtowania się podmiotowości politycznej. Madajczyk P. (ed.), *Mniejszości narodowe w Polsce, (The Roma - formation of political subjectivity)*, (in): *National Minorities in Poland...*, (ed.) Piotr Madajczyk, Polish Academy of Science Institute of Political Studies, Warsaw 1998, pp. 112-114.

<sup>51</sup> Interview no. 9.

<sup>52</sup> Programme 2021-2030, p. 55

<sup>53</sup> Opus cit., p. 57

<sup>54</sup> Programme 2021-2030, p. 11.

significant advance in the situation of the Roma”.<sup>55</sup> In fact, most Roma marginalised families are dependent on social transfers,<sup>56</sup> including child benefits.

In relation to the 500+ programme, the Programme claims that “the Roma became its relatively largest beneficiaries on account of their large family model”.<sup>57</sup> Whatever the ‘family model’ is, portraying Roma as the ‘largest beneficiaries’ of this programme appears to be a dubious claim. According to the ‘National Census of Population and Housing’ (NCPH) carried out in 2011, 16,723 people declared their nationality to be Roma. Given the share of the population, it seems difficult to believe that Roma represent the ‘largest beneficiaries’ in a country of 38 million people.

According to the Programme’s analysis, the Mother+ programme “fundamentally changes the situation of Roma women who often have no chance of earning a pension due to the phenomenon of early marriage”.<sup>58</sup> However, according to Roma rights activists, the Mother+ programme is hardly known among Roma and does not ‘fundamentally change’ the situation of Roma women in Poland. According to one Roma woman who was interviewed (who works in a social care centre), Roma families are ignorant of what programmes exist and where they can apply; it takes a lot of time to explain or get them registered as beneficiaries.<sup>59</sup> Both arguments are, therefore, far from reality; the ideas of the ‘family model’ and ‘early marriage’ belong to the past, even if some families still engage in these practices.<sup>60</sup>

The view of the Supreme Audit Office (quoted in the current Programme) highlights the official position of the state regarding the use of minimum income schemes by Roma: “in the case of some municipalities, a significant part of the funds at the disposal of social care is allocated to benefits for Roma in particular, and their amount (approx. 6 million PLN) exceeded the amount of funds for the implementation of tasks under the Integration Programme for 2014-2020 (approx. 4 million PLN)”.<sup>61</sup> It can be interpreted that these statements reinforce the perception that Roma abuse social services and that they have special privileges.<sup>62</sup>

<sup>55</sup> Opus cit. p. 7.

<sup>56</sup> R. Faracik, M. Mika, R. Pawlusinski (2012). [Social and cultural issues of the Roma minority in Poland](#), 2012, p. 20. “Among all Romani people, the poorest group are the Carpathian Roma [Bergitka Roma - authors]. About 75% of them live on social assistance”.

<sup>57</sup> Programme 2021-2030, p. 45. However, one must take into consideration the total number of Roma minority in Poland, which is small.

<sup>58</sup> Programme 2021-2030, p. 45.

<sup>59</sup> Interview no. 9.

<sup>60</sup> Analysis of FRA Roma survey results by gender, 2013, pp. 30-31. See also: European Roma and Travellers Forum & Romani Women Informal Platform “Phenjalipe” (undated), Making early marriage in Roma communities a global concern, p. 7: “There seems to be however a general agreement between researchers working on the issue that the trend has changed in recent years, and that young Roma are generally dating and marrying at a later stage”. UNICEF Romania (2010) Early Marriages within Roma Communities: Rule of Law, Cultural Autonomy and Individual Rights of Children and Women; AMALIPE CENTER (2011) [Preventing early marriages](#); C. Valentza, Early Marriage and Education Drop Out in Traditional Roma Communities in Transylvania, *Journal of Gypsy Studies*, 2020, Volume: 2, No: 1, p. 40: “Early marriage is not a marriage per se, it is simply an engagement. This ensures the girl’s integrity, originated by the protective role of the father within the deeply patriarchic Roma society. In that sense, early marriage takes place in the form of a ‘promise’ between the families, usually when children are at the age of 2-8 years old with the expectation that the marriage will take place when young girls reach 12-13 years old and young boys 13-15 years old”.

<sup>61</sup> Programme 2021-2030, p. 41. Quoted Supreme Audit Office report relates to findings in nine municipalities of the Małopolskie Voivodeship. See also: [Romowie nie płaca za wodę. Zapłaci za nich gmina, ale nie wszystkim się to podoba](#) (The Roma do not pay for water. The commune will pay for them, but not everyone likes this), 2020.

<sup>62</sup> M. Gasiór, [Rząd da 3 tys. zł na integrację każdego Roma. Posłowie zdziwieni, że tak dużo, a Romowie... nie chcą pieniędzy](#) (The government will give 3,000 PLN for the integration of each Roma. MPs are surprised that

## 2.7. Social services

Social services are not a priority area in the current Programme. The aforementioned logic that Roma are sufficiently served by universal schemes and do not need any targeted or explicit-but-not-exclusive programmes seemingly determines the absence of the former – assuming that accessing social services is a citizens' right and that Roma in Poland have all citizenship rights. As the Programme stipulates, most Roma (92%) live in urban settings, therefore they have access to social services.

In contrast to narratives about social assistance abuse, the Programme's diagnostic claim is that social care centres do what is required – apply a 'colour-blind' policy irrespective of the ethnicity of a person; and do not discriminate against any minority, including the Roma.<sup>63</sup> However, following the Ombudsman's visit to communities of the Bergitka Roma group, they reported that "belonging to this group – with few exceptions [...means living] in deep poverty, in conditions that, without fear of perpetrating abuse, can be considered inhumane".<sup>64</sup> Accordingly, the Roma require redistribution to escape these 'inhumane' conditions.

In reality, antigypsyism plays a role here. A survey of racist attitudes<sup>65</sup> found the clear rejection of Roma, for example, related to housing and having Roma neighbours. These attitudes are likely to be replicated by social services.

## 2.8. Child protection

The Programme places specific importance on Roma children and youth. As with Roma women and girls, the Programme considers Roma children to be a social category in need of support.<sup>66</sup> In the Programme, the notion of "child support" is used instead of "child protection".<sup>67</sup> This is a meaningful difference. The former describes state action in favour

---

this amount is so much, and the Roma... do not want money), 2014: "Thus, the Polish government supports the Roma minority more than Polish children. We would like to remind you that tensions in Poland are growing between our compatriots and the Roma minority. An example is the village of Maszkowice, where the Roma minority has been terrorizing Poles for several months, and several people, including workers going to work, have been beaten up by them. However, it is the Roma who are the apple of the eye of the authorities".

<sup>63</sup> [Zasiłki dla Romów i Polaków na takich samych zasadach](#) (Social benefits for Roma and Poles on the same basis), 2010. See also: Radny: Romowie są obciążeniem dla miasta. MOPS: radny nawołuje do nienawiści (Councilman: The Roma are a burden for the city. MOPS: the councilor calls for hatred), 2015. [Miejski Ośrodek Pomocy Społecznej podtrzymuje twierdzenie, że społeczność ta nie ma żadnych wyjątkowych przywilejów, co sugerował miejski radny Paweł Maj](#) (The Municipal Social Welfare Center upholds the claim that this community does not have any exceptional privileges, as suggested by the city councilor Paweł Maj).

<sup>64</sup> Działania Rzecznika Praw Obywatelskich na rzecz mniejszości romskiej w województwie małopolskim (Activities of the Human Rights Defender for the Roma minority in the Małopolskie Voivodeship), Warszawa 2014, available at: <https://bip.brpo.gov.pl/sites/default/files/Romowie.pdf>

<sup>65</sup> D. Puchala, D. Bulska, Preferencje wyborcze Polek i Polaków a postawy wobec grup obcych (Election's preferences among Poles and their attitudes to non-Polish groups), Warszawa 2020, at: [https://www.researchgate.net/publication/346029591\\_Preferencje\\_wyborcze\\_Polek\\_i\\_Polakow\\_a\\_postawy\\_wobec\\_grup\\_obcych](https://www.researchgate.net/publication/346029591_Preferencje_wyborcze_Polek_i_Polakow_a_postawy_wobec_grup_obcych); also: P. I. KALWAS, Stereotypy, strach i niewiedza, czyli dlaczego Polacy nie lubią Romów [WYWIAD], (Stereotypes, fear and ignorance, that is why Poles do not like Roma [Interview]), Onet, Wiadomości, 7 marca 2021; at: <https://www.onet.pl/informacje/onetwiadomosci/romowie-w-polsce-rasizm-wobec-nich-jest-obecny-takze-na-salonach-wywiad/le1r1b8,79cfc278>

<sup>66</sup> Programme 2021-2030, pp. 63-65. Regarding Roma children the *Programme* briefly says (on page 64): "Ensuring quality education for Roma children forms the basis for improving the situation of the Roma community. Projects addressed to pupils, particularly those concerning development of cognitive functions and those with particular integration value, will be treated as a priority".

<sup>67</sup> Opus cit., p. 35. "failure to take action with regard to children and young people in particular – on account of the more rapid succession of generations in this group – will exacerbate the problem of exclusion in the near future. Roma children and youth are therefore a group assessed as in need of particular support under

of Roma, something the majority can highlight and promote. The latter refers to state efforts to protect children's rights against any abuse, legal or otherwise.

It promises to reduce the high number of Roma children in special schools to the level of the general population (which is about 3.5%),<sup>68</sup> as well as to increase their level of achievement and reduce dropout. It does not relate these negative phenomena to antigypsyism but instead blames the Roma community or Roma culture.

In Poland, at the end of 2020, 71,500 children were in foster care completely or partially deprived of natural family care, including 55,500 in family care and 16,000 in institutional custody.<sup>69</sup> Roma children are not mentioned in these statistics. Given the small number of individuals of Roma minority in Poland and, in general, the claimed 'colour-blindness' of the Polish policy of social welfare centres in localities leads to a lack of clear evidence about the protection and welfare of Roma children. However, anecdotal knowledge about the issue points to the need to gather better data about violence against children, alternative care, and issues related to children and justice. While there is little hard data, prejudice prevails. For example, in contrast to the myths (Roma stealing children),<sup>70</sup> there are examples of Roma foster families taking care of non-Roma children. In fact, more evidence and specific inquiries are needed, both from academic scholars and Roma and Roma Rights organisations.<sup>71</sup> Presently, issues of child protection related to Roma children and youth are typically related to foreign Roma, mainly from Romania (child begging)<sup>72</sup> and now also from Ukraine.<sup>73</sup>

---

this strategy". In addition, the word "support" appears in the Programme 114 times and "protection" only 12 times.

<sup>68</sup> In 2018 the figure was 9.69%, however in 2019 it jumped to 18.25%. This rapid growth is not explained in the Programme.

<sup>69</sup> Główny Urząd Statystyczny (Central Statistical Office), see: <https://stat.gov.pl/wyszukiwarka/?query=tag:domy+dziecka>. See also: Raport Alternatywny (Alternative Report), Warsaw, August 2020, p. 17: "Despite the declared de-institutionalisation of foster care, 21% of children live in institutions. This number does not include several thousand children staying outside their families in institutions outside the foster care system, such as Nursing Homes (DPS), Establishments Care and Treatment (ZOL) or other places of long-term 24-hour stay. Since the introduction of the act (2012), the number of care and educational institutions has increased from 508 in 2011 to 1,063 in 2018".

<sup>70</sup> [Panika w regionie! Cyganie porywają dzieci?](#) (Panic in the region! Gypsies kidnap children?), 19.09.2016.

<sup>71</sup> [Najgrzeczniejsze są dzieci romskie, z domów dziecka, dysfunkcyjne, na końcu z rodzin normalnych](#) (The politest are Roma children, from orphanages, dysfunctional, and finally from normal families), 18.09.2014. Usually, the Roma minority in Poland are not the subject of headlines similarly to in countries where the Roma minority are numerous. See for example, *Blighted lives: Romani children in state care*, European Roma Rights Center, 2021, p. 7; see also: [Stacey Dooley Investigates: Gypsy Kids In Crisis](#): "Stacey meets staff and teenage residents in Hungary's children's homes where often over 70 percent of the residents are Roma gypsy kids. Stacey discovers that many of these homes are far from a refuge from the chaotic families the children were taken from, but instead many are said to be rife with drug use, prostitution, physical and sexual violence, with care workers feeling powerless to intervene"; also: M. Marvel and D. Felja, [How structural racism faced by Roma families in the child protection system can be tackled](#), 2020.

<sup>72</sup> [Poznań: żebrzące romskie dzieci na ulicach. "Nikt nie reaguje"](#) (Poznań: begging Roma children on the streets. "Nobody reacts"), 16.03.2017; see also: [Zorganizowana grupa romskich żebraków na Krupówkach. Dzieci zbierają nawet po 600 złotych dziennie](#) (An organised group of Roma beggars in Krupówki. Children collect up to PLN 600 a day), 2018.

<sup>73</sup> A. Mikulska, *Romowie z Ukrainy traktowani jak uchodźcy drugiej kategorii. "Słyszymy: tych ludzi nie przyjmujemy"* (Roma from Ukraine treated as second-class refugees. "We hear: we do not accept these people"), 1. 04. 2022, available at: <https://oko.press/romowie-z-ukrainy-traktowani-jak-uchodzcy-drugiej-kategorii-slyszymy-tych-ludzi-nie-pryjmuujemy/>; see also: [Romowie uciekający przed wojną trafiają do najniższego kręgu uchodźczego piekła](#) (Roma fleeing the war end up in the lowest refugee circle of hell), 18.03.2022.

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

The Programme mentions celebrating Roma historical dates or other important events but awareness of Roma arts, culture and history among the non-Roma mainstream remains minimal. This requires teaching about and including these topics in textbooks in schools and media. The Programme does not propose such things.

The same is true about Roma narratives; the majority's dominant narratives are present and visible but the views of the Roma minority hardly challenge them. Active local authorities, according to Roma, see most interventions within the Programme as accidental or standard events.<sup>74</sup> Many Roma projects are considered by the Programme to perpetuate stereotypical views, even if these are positive, and limited. Efforts to sensitise clerks and teaching staff about Roma history (events designed to memorialise the killings during WWII or the Romani flag) or arts and culture are understood mostly as 'folklorisation'.<sup>75</sup> Roma arts are still considered 'low arts'<sup>76</sup> and the emerging elite is still minimal.<sup>77</sup>

There is a contradiction between what the Programme aims for and what the Minority Act of 2005 stipulates in this area.<sup>78</sup> The Programme supports interventions that should basically be financed as activities that support Roma identity-building and maintenance. As a result, the support provided by the Minority Act in the case of the Roma minority is minimal, and its role is taken over by the Programme.<sup>79</sup>

The Programme considers "elders" to be a conservative power, upholding the view that "Roma culture" and "elders" discriminate against Romani women and girls. This approach, visible in the current Programme, is reminiscent of an earlier orientation, or of the communist regime, which similarly considered 'elders' to be a 'subversive' and 'conservative' power that needed to be combatted and curtailed.<sup>80</sup> In fact, Roma 'elders' and their leading roles survived the communist past and they still have significant power in the Roma community.<sup>81</sup>

---

<sup>74</sup> Interview no. 7.

<sup>75</sup> Interview no. 9.

<sup>76</sup> W. Szymanski, *The Importance of Place: Romani Art, Central Europe, and the Case of Czarna Gora*, (in) M. Sherman (ed.), *International Opportunities in Arts*, Vernon Press 2019, p. 406. "(...) misconception asserted that Gypsies were not capable of making modern professional art. Consequently, the Romani people's artistic production attracted the interests of ethnographers rather than art critics".

<sup>77</sup> Example such as of Malgorzata Mirga-Tas, an educated artist at Fine Arts in Krakow, are rare. She won a prize from the Ministry of Culture and represented the Polish Pavilion at the Venice Biennale this year (2022).

<sup>78</sup> Text of the Act on National and Ethnic Minorities, 2005, Available at: <https://www.gov.pl/attachment/f6197e7c-2c12-45e5-8fa2-77dcb3b9657c> . Such an obligation arises from the Act on National and Ethnic Minorities, Chapter 3, Education and culture, Article 17 and 18.

<sup>79</sup> Programme 2021-2030, p. 54. "Examples of educational measures (the catalogue is open) include elements of Roma identity building and maintenance which should be part of provisions of the Minority Act but include also new elements, such as, 'civic education (citizens' rights and obligations, patriotic ceremonies and ones related to 'little homelands', shaping tolerant attitudes, forging bonds with the national community, education related to electoral processes, etc.)" and "(...) health education (vaccinations for Roma pupils, prevention programmes aimed at Roma pupils and parents, including addiction prevention, promotion of a healthy lifestyle, healthy nutrition, ecology, sports activities, etc.)".

<sup>80</sup> A. Mirga, *Romowie – proces kształtowania się podmiotowości politycznej*. Madajczyk P. (ed.), *Mniejszości narodowe w Polsce, (The Roma - formation of political subjectivity)*, (in): *National Minorities in Poland...*, (ed.) Piotr Madajczyk, *Polish Academy of Science Institute of Political Studies, Warsaw 1998*, pp. 133-135.

<sup>81</sup> For example, see the selection of current Sero Rom, the traditional leaders of previously nomadic Roma groups in Poland. After the death of the 'old one', over a thousand Polska Roma gathered at this selection process and many watched the ceremony via internet, available at: <https://www.youtube.com/watch?v=a0dQBq3GcAk>; <https://www.youtube.com/watch?v=aKJ2tJkbGSs>

### 3. EXPECTED EFFECTIVENESS

There is not much coherence between what the Programme proposes and domestic mainstream policies that targeted at all citizens. Contradictions between the two are traceable in the text. The Programme stresses that:

*"[t]he new integration strategy was constructed to account for the crucial changes [...] which in recent years have contributed greatly to improving the economic standing of the Roma in Poland. Mention should be made here of the following government programmes: the government demographic programme Rodzina 500+ [Family 500+], the government programme Dobry Start [Good Start], [and] government programme Mama 4+."*<sup>82</sup>

Mainstream European policies that are mentioned as beneficial for the majority and Roma children and youth are, in fact, largely inaccessible (or unimportant) for the Roma because of the insignificant number of those who have successfully finished secondary or higher education (life-long learning, digital society, and social enterprises).

There is also not much coherence between the Programme and the EU Council Recommendation. The latter requires that the Programme should reflect the Recommendation, although it leaves space for national context, local tradition, orientation, and local practices. However, the Polish Programme does not pursue the Council Recommendation; i.e., does not mention the concept of *antigypsyism* at all. In fact, the Programme does not specify combating discrimination and ensuring equality as priority areas.<sup>83</sup> It claims, however, that Roma themselves do not value projects that target discrimination. The Programme therefore fails to address the root causes of Roma marginalisation whether in education, housing, employment or health or other areas.

#### 3.1. Responsibility for NRSF coordination and monitoring

Responsibility for development, coordination of implementation, and monitoring of the Programme 2021-2030 lies with the MSWiA, where only one person is currently in charge of this agenda; previously, a department consisting of three people was responsible for the same agenda, but this was dissolved.

The MSWiA relies on regional offices (*voivods*) and minority plenipotentiaries who are responsible for some coordination tasks. In principle, Roma could be employed in these offices but at the moment no Roma plenipotentiaries are.<sup>84</sup> Projects are evaluated by commissions established by *voivod* at the regional level, but very few represent Roma

---

<sup>82</sup> Programme 2021-2030, p. 14. Rodzina 500+ [Family 500+] - every child under 18 years of age receives 107.98 EUR/month (1 EUR= 4.6304 PLN, 1 PLN = 0.2160 EUR), the government programme Dobry Start [Good Start] - It is 64.79 EUR (1 EUR= 4.6304 PLN, 1 PLN = 0.2160 EUR) in one-time support for all students starting the school year, received every year. The government programme Mama 4+ is intended for people who, in order to raise at least four children, cannot take up gainful employment or have given it up, and today live on the poverty line without the right to even a minimum level of benefits.

<sup>83</sup> Programme 2021-2030, p. 62 "(...)the present strategy does not define the phenomenon of discrimination as a separate area of intervention but treats the principle of non-discrimination and the human rights protection perspective as a general rule and objective guiding the entire Programme.(...) All measures taken by the State, also outside this strategy, should contribute to the elimination this phenomenon which destroys the civic community and providing education and knowledge to the Roma community and to the majority society is the most effective tool possible to protect individuals and the whole group from discrimination. The broadly defined civic education will serve this purpose".

<sup>84</sup> During the implementation of the previous *Programme* there were two such plenipotentiaries, for the Małopolska region and for Lower Silesia.

there.<sup>85</sup> The majority of those working in such commissions are voivod office clerks, who know each other and have no expertise about Roma and the problems they face.<sup>86</sup>

### 3.2. Quality of the plan

Compared to the previous Programme – which was shorter but covered a broader scope of policies – the current one seems to be more detailed. The plan of action to be implemented, the timing and indicators, and monitoring and evaluation of the achievement of objectives are included in the strategic plan. The Strategy calls for annual reports submitted by voivodeships and evaluations after five and ten years. The plans adopted by the Ministry concerning the functioning of the Programme seem to be realistic.

The strategy is planned for ten years. Every year, a specific one-year set of guidelines is issued (an appendix to the MSWiA information concerning the detailed rules of grant distribution under the Programme for the given year); however, the Ministry is not entitled to coordinate this regionally: instead, the voivodeships are in charge. At the level of voivodeship, a commission is appointed for the evaluation of projects submitted by NGOs and local governments. The commission gathers the best proposals and submits them for approval by the Ministry. Once the Ministry has received all the projects from each voivodeship, financial resources are allocated to them. This also implies that applicants need to submit their applications each year for the respective cycles.

As far as the substantive realisation of the indicators that have been adopted and assumed is concerned, the situation seems to be complicated. In the chapter “Measures and corresponding indicators”,<sup>87</sup> a few indicators from specific areas are presented. However, they create more confusion than clarity.

### 3.3. Funding

Funding remains the strongest part of the Programme. Part 83 of the State budget designates a total of 2,135,885 EUR per annum for education and housing,<sup>88</sup> plus funds from Part 43 (system projects like scholarships) to the amount of 151,371 EUR per annum, and funds from Part 30 (school education) to the amount of 151,371 EUR per annum.<sup>89</sup> These funds amount to almost 25 million EUR<sup>90</sup>; that is, 2.5 million EUR yearly from the national budget.<sup>91</sup> The indicated annual budget is guaranteed and committed in advance

---

<sup>85</sup> Currently Roma are participating in six such commissions out of 16. Usually, they can be outvoted by the non-Roma majority.

<sup>86</sup> Interview no. 4, interview no. 7, and interview no. 8. In general, Roma members of such commissions are frustrated with the way such commissions operate and decide (without much transparency) which projects are to be supported.

<sup>87</sup> Programme 2021-2030, pp.58-60.

<sup>88</sup> Opus cit. p. 69. ‘The basis for financing the Integration Programme for 2021-2030 are funds from the special-purpose reserve of the State budget (part 83 of the State budget)’.

<sup>89</sup> Programme 2021-2030, p. 69.

<sup>90</sup> 1 EUR= 4.6244 PLN, 1 PLN = 0.2162 EUR

<sup>91</sup> Opus cit., p. 70. See also: Fourth Report submitted by Poland pursuant to Article 25, paragraph 2 of the Framework Convention for the Protection of National Minorities, ACFC/SR/IV(2019)001, p. 36. Funding of previous Programme: “The funding for the Programme amounted to PLN 9,868 (ca. EUR 2,303,105) under the special-purpose reserve within the state budget, mobilised on the initiative of the Minister of the Interior and Administration. This amount was distributed on behalf of the Minister of the Interior and Administration through Voivodes. Additionally, under Part 43 of the state budget, the Minister of the Interior and Administration allocated PLN 450,000 (ca. EUR 105,026) for scholarships for gifted Roma students, and for upper-secondary students”. For certain tasks in the area of education, the amount of PLN 700,000 (ca. EUR 163,374) was allocated from the budget of the Minister of National Education (Part 30 of the state budget). In 2015, from own funds and other sources the bodies implementing the tasks raised an additional PLN 894,000

in the Programme, thus there is no risk that the government will stop funding. Specific allocations for different objectives/measures are indicated in the Programme.

The main stakeholders in charge of implementing projects for the Programme's final beneficiaries ("Roma and non-Roma communities") are local authorities. They are both privileged (as they have required resources to cover the specified 15% co-financing of projects) but also obliged by central authorities to carry out some projects (especially in the areas of education and housing). In previous Programmes, local governments were the dominant stakeholders involved in the implementation of projects.<sup>92</sup> In the current one, the proportion of projects planned to be implemented by municipalities should be nearly equal to that of other institutions (such as universities) and civil society organisations (Roma and pro-Roma).

The public call under the Programme allows for Roma and other interested parties to apply with projects if they would like to do something for/support the marginalised Roma community. Therefore, state institutions and self-governments consider the Programme as a source of funding for all interventions and activities in marginalised Roma communities. Roma and pro-Roma organisations are encouraged to come up with projects and make use of funding provided by 'own' or 'Roma Programme' funding.

### 3.4. Monitoring and evaluation

The Programme specifies indicators and targets that are to be achieved by 2030. Some of them, however, do not seem to be realistic and create more confusion than clarity.

The latter operates with a set of "basic indicators", "assumed average annual indicators 2021–30", and a "target indicators to be achieved in 2030". It calculates that the "average annual indicator" multiplied by ten years (the timespan of the Programme) will give the "target indicator achieved in 2030". For example, a basic indicator for Roma children in preschool education has a value of 168, and the "average annual indicator" has a value of 300. Multiplying the last number by ten years one arrives at 3,000 children in pre-schools as the "target [to be] achieved [by] 2030". The Programme does not foresee any factors or risks that may impact that calculation – for example, the migration of Roma from Poland, or the changing model of Roma families.

Further, it causes confusion in places, as with the entry "Total number of persons covered by Intervention Area I: Education under the Integration Programme for 2021-2030". It establishes the "basic indicator" as 5,829, "average annual indicator" as 6,000 and "target achieved in 2030" at as much as 60,000. The numbers quoted, however, exceed the official number of Roma in Poland – according to the census data from 2011, there were 16,723 Roma in total. One can assume that the 'indicators' include not only state support for Roma children, but also for non-Roma (the Programme uses here the notion of a 'person', not Roma, similarly to in the next area related to health education). However, in the area of housing, where the Programme declares that non-Roma neighbours shall be among the beneficiaries of projects, the Programme establishes the "Average annual

---

(ca. EUR 208,652), which they allocated for funding the programme tasks. The voivodeships that allocated the largest amounts from other sources for programme tasks are the following: Małopolskie Voivodeship – PLN 290,000 (ca. EUR 67,683), Śląskie Voivodeship – PLN 254,000 (ca. EUR 59,281), Dolnośląskie Voivodeship – PLN 136,000 (ca. EUR 31,741). Out of this amount, for the implementation of all the tasks under the Programme in 2015 a total of PLN 11,658,000 (ca. EUR 2,720,876) was used, i.e., 97.9% of all the appropriations committed.

<sup>92</sup> Opus cit. provide a figure of "Total number of entities carrying out tasks in 2015-2019", 529, of which (56%) were entities from the public finance sector, including local government units, and 413 (44%) non-governmental organisations, including 239 (70% of NGOs) Romani organisations. (p. 17) However, a SWOT analysis of the Integration Programme for 2014-2020 includes among the 'Weaknesses' the following statement: "lack of effective involvement of many LGUs in systemic measures targeting the Roma" (p. 43, Figure 32).

Number of Roma covered by housing measures in 2015-2019”, therefore indicating the target – the Roma. In general, thus, the indicated target values indicators are not realistic.

MSWiA and voivods plan to monitor the progress of Programme 2021-2030 implementation on an ongoing basis and assess its implementation each individual year. By the end of February each year, the voivodeship will forward an aggregated report to MSWiA on the Programme’s implementation on their territories and the ministry will publish a summary analysis. A special report by municipalities and voivodeships will deal with the education of Romani children.

To evaluate the success of the Programme’s implementation, MSWiA foresees the implementation of research and the development of reports with the involvement of independent experts, non-governmental organisations, and other institutions. In practice, however, such evaluation-related commissions are awarded to organisations and experts who are non-Roma and have high social and intellectual capital. The selection criteria for evaluation reports do not include a requirement for the involvement of Roma researchers, and Roma do not participate in their design either; Roma are engaged only as the research subjects and “final beneficiaries”.<sup>93</sup> Some interviewees expressed concern about the transparency of the public procurement of the evaluation services.

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

The authors of this report consider the expected effectiveness of the Programme 2021-2030 to be low, especially because the role and active involvement of Roma – the final beneficiaries of the policy – are not clearly defined and will be likely insufficient (because of barriers such as the latter’s generally low level of education and social exclusion), and due to the minimal amount of innovation in the new Programme compared to the previous ones. Not much has been learned from earlier projects associated with the programmes; in large part, the present one will continue earlier activities (such as supporting Roma education mediators or supporting non-Roma teachers). Neither has many of the good practices of other EU Member States been adopted – for example, in the field of public employment services.

Many Roma leaders are critical of the idea of the ‘innovative’ projects planned by the Programme. The region or voivod commissions that assess projects generally decide to support projects that are less ambitious or routine, and Roma leaders and experts (very few) have no power to influence such decisions.<sup>94</sup> The Programme, therefore, will repeat previous mistakes and the Roma situation will not change significantly, but a few ‘engaged’ institutions will benefit instead of solutions being found to the persisting issues the Roma community face in Poland.<sup>95</sup>

Financing remains a strong component of the Programme. It relies mainly on the state budget, which provides the necessary sustainability.

---

<sup>93</sup> Interview no. 9.

<sup>94</sup> Interview no. 4, interview no. 7, and interview no. 9.

<sup>95</sup> Roma Civil Monitor, 2019, p. 15

## 4. ALIGNMENT WITH THE EU ROMA STRATEGIC FRAMEWORK

The Programme argues against easy generalisations and advocates for “local diagnosis” in which all interested parties are involved.<sup>96</sup> The requirement of such local diagnosis that reflects “local realities” assumes that a central role will be played by the LGUs, especially, in education and housing. However, such a role assigned to LGUs counters the centralisation<sup>97</sup> visible in how the ruling coalition and Ministry approach Roma integration.

While diversity among the Roma groups in Poland is recognised, the Programme fails to address the commonalities that make out of them a single minority and to address the issue of antigypsyism. The latter term and notion are avoided by the Programme.

The Programme names Roma women, girls, children, and Roma education assistants as specific groups subject to support. However, Roma women, girls, and children possess no political power, especially among the former nomadic groups of Roma in Poland.<sup>98</sup> While the focus is right, the way the Programme proposes interventions is wrong: it blames elders or the Roma’s own culture for discrimination but ignores the majority’s antigypsyism.

### 4.1. Combining mainstream and targeted approaches

In the case of the Programme, targeted activities and mainstream policies are named but the issue of mainstreaming Roma inclusion is not much discussed.

Mainstream policies, such as the government demographic programme *Rodzina 500+* [Family 500+], the programme *Dobry Start* [Good Start], and the programme *Mama 4+* in the view of the Programme “have contributed greatly to improving the economic standing of the Roma in Poland”.<sup>99</sup> The Programme mentions the policy of Responsible Development for the period until 2020 (including the perspective until 2030)<sup>100</sup> that refers to an “increase in the Poles’ affluence and a reduction in the number of people at risk of poverty and social exclusion”<sup>101</sup> – this also refers to Roma marginalised families.

Targeted interventions are based on the conviction that improvements in areas of education and housing will solve problems in other areas. It is further believed that mainstream policies can supplement earlier action and both can lead to results: that is, to a change in the way Roma live and in their culture.<sup>102</sup> However, the idea of ‘change’ is in

---

<sup>96</sup> Programme 2021-2030, p. 52

<sup>97</sup> Dawid Sześciło, *Samorząd–centrum. Bilans po trzydziestu latach od odrodzenia się samorządu i pięciu latach nowego centralizmu (Self-government – center. Thirty years after the rebirth of self-government and five years of new centralism)*, 19 June, 2020,

<sup>98</sup> Interview no. 7. See also, A. Mirga, *Romowie – proces kształtowania się podmiotowości politycznej*. Madajczyk P. (ed.), *Mniejszości narodowe w Polsce, (The Roma - formation of political subjectivity)*, (in): *National Minorities in Poland*, (ed.) Piotr Madajczyk, Polish Academy of Science Institute of Political Studies, Warsaw 1998, p. 179: “Attempts to undermine the authority of the elders by not recognizing it, bypassing it or replacing the so-called Gypsy guardians, remained ineffective. Hitting the elders undermined all efforts to integrate and assimilate the authorities”.

<sup>99</sup> *Opus cit.*, p. 14

<sup>100</sup> *Opus cit.*, p. 50. The Strategy for Responsible Development for the period up to 2020 (including the perspective up to 2030).

<sup>101</sup> *Opus cit.*, p. 50

<sup>102</sup> Programme 2021-2030, p. 11

fact the assimilation that the Polish strategy considers necessary for the Roma to be accepted as part of society.<sup>103</sup>

Furthermore, the Programme considers non-Roma to be 'beneficiaries' of the Roma-targeted actions if they live in close connection with Roma settlements.<sup>104</sup> However, the authors of this report consider such an extension of the Programme's target groups inappropriate: non-Roma who neighbour Roma do not face similar exclusionary attitudes from the majority, or antigypsyism. They are usually much better off in all dimensions than the marginalised Roma.

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

The Programme makes no use of instruments introduced by the Council Recommendation, especially concerning the intent to strengthen measures against hate speech, hate crime, and violence directed against Roma people. In fact, the Programme maintains that there is not much interest in those measures among the Roma.

The Council Recommendation refers to equality and non-discrimination as a horizontal objective and principle. However, the Programme focuses on the 'existence of prejudice against representatives of other Roma groups'<sup>105</sup> or categories such as Roma women and girls<sup>106</sup> following a 'blame the victim' mentality. In fact, the Programme disregards the call of the Council Recommendation "to focus on combating and preventing discrimination, including by tackling antigypsyism, which is a root cause of and exacerbates discrimination and exclusion".

It is impossible to find in the Programme formulations similar to those in the Council Recommendation such as, for example, "measures to effectively fight direct and indirect discrimination, including by tackling harassment, antigypsyism, stereotyping, anti-Roma rhetoric, hate speech, hate crime and violence against Roma, including incitement thereto, both online and offline". Similarly, the Programme does not speak about "measures to foster positive narratives about Roma" nor highlights measures "to encourage effective parental involvement in the education of Roma pupils". Neither does it refer to "report[ing] on and monitor[ing] national Roma strategic frameworks, as independent watchdog organisations, and [...] maintain[ing] their administrative capacity".

---

<sup>103</sup> B. Garcés-Mascareñas, R. Penninx (eds), *Integration Processes and Policies in Europe*, Springer 2016, available at: <https://link.springer.com/book/10.1007/978-3-319-21674-4>. One can find such a statement: "We define integration as 'the process of becoming an accepted part of society'. This elementary definition is intentionally open in two regards. First, it emphasises the process character of integration rather than defining an end situation. Second, in contrast to the normative models developed by political theorists, it does not specify beforehand the degree of or even the particular requirements for acceptance by the receiving society'.

<sup>104</sup> The Council recommendation on Roma equality, inclusion and participation says that any measures can be applied "without aiming to exclude other disadvantaged groups. Those measures should be based on the same principles in comparable situations. In this respect, the common basic principles for Roma inclusion remain relevant". The Programme sees it differently (p. 52): "by definition, the projects may and should also include representatives of the majority community, alongside the Roma. The scale and scope of participation of the general population's representatives as beneficiaries of the measures depend on the area of intervention (e.g. in the case of such educational activities as excursions, camps, etc. – participation of non-Roma children should be ensured; in the case of renovations – renovation of the so-called common areas of buildings should also be part of a project". The question is whether there are 'comparable situations' enabling the use of similar measures for both communities.

<sup>105</sup> Programme 2021-2030, p. 62. "It is necessary to strive to eliminate these negative phenomena when planning measures, all the more so, as the existence of prejudice against representatives of other Roma groups is not identified in these communities as a discrimination phenomenon".

<sup>106</sup> Opus cit. 63. "they are a group exposed to intersectional discrimination on the grounds of their ethnic origin, gender, low social and economic status as well as the patriarchal model of Roma culture. Thus, Roma women should be provided with particular support under the current integration programme".

## CONCLUSIONS AND RECOMMENDATIONS

The governmental 'Programme for Social and Civic Integration of the Roma Community in Poland for 2021-2030' is a continuation of earlier Programmes. An important aspect of the Programme remains its financing. This is based mainly on budgetary funds and in this sense is sustainable.

The structure and priorities proposed in the Programme do not reflect the guidance and measures proposed in both the Council Recommendations and the EU Roma Strategic Framework with regard to problems faced by Roma in the field of employment, while health remains unaddressed. Only two thematic areas of intervention are proposed: education and housing. This does not mean that other areas of support are not needed.

The notion of antigypsyism is not even mentioned in the text. It is believed that the whole Programme has an antidiscrimination character, therefore, it deals with the issue 'horizontally'. Further, the Programme stresses that Roma organisations themselves do not highly appreciate it, although no references are given in this regard. This contrasts with the EU Council Recommendation, which sees antigypsyism as the root cause of many ills which preclude Roma inclusion in Europe.

The major weakness of the Programme, however, lies in the way it seeks to explain Roma 'marginalisation' as a result of 'Roma culture'. In this way, the Roma themselves (or their culture) are found guilty. The aim of the Programme is to better integrate Roma in Poland.

### ***Recommendations to national authorities***

1. Antigypsyism should be recognised in the Programme as a root cause of many barriers to integrating Roma, and measures to address it, in all forms of its expression and manifestation, should be developed and implemented.
2. Roma leadership, participation, empowerment and self-organisation as well as consultation processes must be revisited and redefined, especially in the context of the changing culture and relationship between the generations. Efforts to improve civic engagement among Roma and their interest in politics, particularly among Roma youth, should include training, awareness-raising campaigns, capacity building, and the placement of Roma candidates on mainstream political party electoral lists.

### ***Recommendations to European institutions***

3. European and international institutions should push Member States to ensure that the issue of antigypsyism is included and properly addressed in their Roma Programmes.

### ***Recommendations to civil society***

4. Civil society organisations should invest in their own empowerment, build coalitions, and demand the authorities permit them to participate at every stage of building, implementing, monitoring, evaluating and reporting on Roma Programmes.

## REFERENCES

### *List of interviews*

Almost all interviews were conducted collectively by all members of the RCM coalition in Poland. The interviews were conducted using the MS TEAMS app and recorded. In-text citations refer to interviews using their numbers:

1. Interview with the representative of the Ombudsman Marcin Sośniak, 15 March 2022.
2. Interview with a representative of the Ministry of Interior and Administration Małgorzata Milewska, 10 March 2022.
3. Interview with Jerzy Grzegorzczak, a researcher who studies Roma in Poland, especially in the field of Roma assistants, 23 March 2022.
4. Interview with Karolina Kwiatkowska and Karol Kwiatkowski, representatives of the Central Council of Roma in Poland, and members of the voivod commissions assessing projects for Roma community to be financed from the Programme, also working as Roma assistants, 24 March 2022.
5. Interview with Izabela Jaśkowiak, a representative of the Roma Educational Association Harangos, 06 April 2022.
6. Interview with Sonia Styrkacz, Roma assistant and expert from Chorzów, member of the voivod commission assessing projects for the Roma community to be financed from the Programme, 06 April 2022.
7. Interview with Krystyna Markowska, representative of the Association of Roma Counselling and Information Centre in Poland based in Pabianice, member of the voivod commissions assessing projects for the Roma community to be financed from the Programme, 07 April 2022.
8. Interview with Monika Szewczyk, Romani expert, member of the voivod commissions assessing projects for the Roma community to be financed from the Programme, 07 April 2022.
9. Interview with Monika Sternal, Roma assistant from Limanowa, member of the voivod commissions assessing projects for the Roma community to be financed from the Programme, 07 April 2022.
10. Written correspondence with the Ministry of Education and Science, 01 April 2022.
11. Written correspondence with the Malopolska Voivodeship Office in Cracow, 13 April 2022.

### *Key policy documents and reports*

*Act on National and Ethnic Minorities 2005*. Available at:  
<https://www.gov.pl/attachment/f6197e7c-2c12-45e5-8fa2-77dcb3b9657c>

BORIS Association (undated) *The evaluation of the Programme for the integration of the Roma community for the years 2014-2020*. Available at:  
<http://mniejszosci.narodowe.mswia.gov.pl/download/86/22520/RaportzewaluacjiProgramunarzecintegracjispolecznościromskiejnalata2014-2020.pdf>

Ministry of Interior and Administration (2020) *Programme for Social and Civic Integration of the Roma Community in Poland for 2021-2030*. English version available

at: [https://ec.europa.eu/info/sites/default/files/programme\\_of\\_roma\\_integration\\_2021-2030.pdf](https://ec.europa.eu/info/sites/default/files/programme_of_roma_integration_2021-2030.pdf)

Roma Civil Monitor (2018) *Civil society monitoring report on implementation of the national Roma integration strategies in Poland: Focusing on structural and horizontal preconditions for successful implementation of the strategy*. Available at: <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-1-poland-2017-eprint-fin-4.pdf>

Roma Civil Monitor (2019) *Civil society monitoring report on implementation of the national Roma integration strategies in Poland. Assessing the progress in four key policy areas of the strategy*. Available at: <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-2-poland-2018-eprint-fin.pdf>

Roma Civil Monitor (2020) *Civil society monitoring report on implementation of the national Roma integration strategies in Poland. Identifying blind spots in Roma inclusion policy*. Available at: <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-3-poland-2019-eprint-fin.pdf>

Supreme Audit House (2017) *Information on the results of the audit: Implementation by GMINAS from the Małopolskie voivodeship tasks within the Programme for Integration of the Roma Community in Poland for the years 2014-2020*. Available at: <https://www.nik.gov.pl/plik/id,13984,vp,16428.pdf>

*The Fourth Opinion on Poland of the Council of Europe Advisory Committee on the Framework Convention for the Protection of National Minorities*: <https://rm.coe.int/4th-op-poland-en/1680993391>

## ANNEX: LIST OF PROBLEMS AND CONDITIONS

### *Fighting antigypsyism and discrimination*

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
Antigypsyism not recognised as a specific problem in national policy frameworks	Significant problems	Irrelevant	Absent	Absent
Prejudice against Roma	Significant problems	Mentioned but not adequately analysed	Present but insufficient	Absent
Hate crimes against Roma	Significant problems	Mentioned but not adequately analysed	Present but insufficient; two institutions are mentioned: Ministry of Justice and Police; they are supposed to follow on and provide data to MSWiA . Both are compromised in relation to Roma and to EU institutions.	Absent
Hate speech towards and against Roma (online and offline)	Significant problems	Mentioned but not adequately analysed	Present but insufficient; two institutions are mentioned: Ministry of Justice and Police; they are supposed to follow on and provide data to MSWiA . Both are compromised in relation to Roma and to EU institutions.	Absent
Weak effectiveness of protection from discrimination <sup>107</sup>	Significant problems. However, according to the	Mentioned but not analysed sufficiently. The Programme	Present but insufficient. the Programme aims to support	Absent

<sup>107</sup> Despite the antidiscrimination law that is in place, people may face barriers (both internal, such as a lack of awareness or resources; or external, such as complicated administrative rules) in benefiting from it. Therefore, diverse measures may be adopted to facilitate people's access to protection from discrimination: the right to file a complaint with the equality body or the courts in the public interest (i.e., a CSO files the complaint instead of individual victims of discrimination); free-of-charge legal advice/aid from the equality body or other public authority or CSO receiving public funding for this purpose; or complaints investigated by the equality body.

	MSWiA its minor problems as Roma projects did not focus on. Besides antidiscrimination is supposedly generalise approach of whole the Program...but that is not the case	exposes internal discrimination by Roma culture of Romani women and girls...	Romani women and girls against the Roma culture or 'elders'...	
Segregation in education, housing, or provision of public services	Significant problems	Understood with limitation. Education is the main priority, followed by housing, mainly for one group – Bergitka Roma in southern Poland. Other public services are not addressed.	Present but insufficient. Regarding other public services: the Programme is recalling 3 general programmes (for all citizens) that should serve Roma also. However, these programmes are more electoral policies than otherwise...	Some targets in the areas of education and housing, partly in employment, but not realistic
Forced evictions and demolitions leading to homelessness, inadequate housing, and social exclusion	Minor problem re: forced evictions. Significant problem re: inadequate housing and social exclusion	Understood with limitations	Present but insufficient.	some targets: in area of housing
Statelessness, missing ID documents	Irrelevant	Irrelevant	Absent	Absent
Misconduct and discriminatory behaviour by police (under-policing/under-policing)	Significant problems	Irrelevant according to the Program	Absent	Absent
Barriers to <i>de facto</i> exercise of EU right to free movement	Irrelevant according to the Program	Irrelevant according to the Program	Absent	Absent

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

Education

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
Lack of available and accessible pre-school education and ECEC services for Roma	Significant problems	Understood with limitations	Present but insufficient	Some targets but not realistic
Lower quality of pre-school education and ECEC services for Roma	Significant problems	Understood with limitations	Present but insufficient	Absent
High drop-out rate before completion of primary education	Significant problems	Understood with limitations – ‘blame the victim’ syndrome or Romani culture, but not addressing majority’s attitudes or antigypsyism...	Present but insufficient - ‘blame the victim’ s or Romani culture, but not addressing majority’s attitudes or antigypsyism	Some targets but not realistic
Early leaving from secondary education	critical problems	Understood with limitation. The Programme is blaming Romani culture and the practise or early marriage and pregnancy against some quoted data pointing otherwise	Present but insufficient. The Programme is blaming Romani culture and the practise or early marriage and pregnancy against some quoted data pointing otherwise. The issue of economic status and antigypsyism are not mentioned in this context.	Some targets but not realistic
Secondary education/vocational training disconnected from labour market needs	Significant problems	Understood with limitation.	Present but insufficient. The Programme aims to continue trainings from which Roma hardly benefit. Usually such trainings are disconnected from market needs and are done by non-Roma institutions	Some targets but not realistic, especially, that their number are rising slowly (are irrelevant)

			and organisations and are costly.	
Misplacement of Roma pupils into special education	Significant problems	Understood with limitations	Present but insufficient. Still the number of children in special education are too high in comparison with majority. The Programme aims to invest some funds into psychological and pedagogical commissions (preparing them for facing Roma child being of different culture and language), with participation of Roma school assistant – the way to limit children present in special education	Some targets but not realistic
Education segregation of Roma pupils	minor problems	Understood with limitation. The issue seems to belong to the past; during the communism some segregation in schools existed. In the 90-s (after fall of communism) some 30 schools for Roma children functioned, however, they were closed and Roma children had to attend integrate classrooms.	Absent	Absent
Increased selectivity of the educational system resulting in concentration of Roma or other disadvantaged pupils in educational facilities of lower quality	Minor problems.  In Poland Roma are mainly city's dwellers and attend schools there.	Understood with limitation – minor problems exist among Bergitka Roma who are living in small cities and villages. However and in general the programme is ignoring the issue of majority's attitudes and antigypsyism in both contexts	Absent	Absent

		that is in cities and countryside...		
Limited access to second-chance education, adult education, and lifelong learning	Minor problems	Understood with limitation. Few Roma, including adults, are dedicated to second-chance education and life-long learning	Present but insufficient.	Absent
Limited access to and support for online and distance learning if education and training institutions close, as occurred during the coronavirus pandemic	Significant problems	Understood with limitation – Roma school assistants claim Roma children have limited access and support for online learning as during coronavirus either because they are poor and have to needed tools for or are less committed to have such access.	Present but insufficient – the MSWiA is aware of the problems but blames the Roma for it.....	Absent
Low level of digital skills and competences and limited opportunities for their development among pupils	Significant problems	Understood with limitation	Present but insufficient -	Absent
Issue of quality of teaching, progress made by pupils and school achievement	Critical problems	Understood with limitation – the Programme does not address the issue of majority’s attitude and antigypsyism...	Present but insufficient – too much the priority area of education rely on the Roma education assistants (plans to increase it but insignificantly); the Programme is foreseeing ‘innovative’ projects, but aims to do more of the same things as in the past. ‘Innovative’ should be priority here and focus on rising quality and achievements in education, including through, investing more in Roma parents and having them responsible for	Absent

			this achievements.	
--	--	--	--------------------	--

## Employment

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
Lack of available and accessible pre-school education and ECEC services for Roma	Minor problems - according to the Government	Mentioned but not analysed sufficiently - no mention of discrimination or antigypsyism	Present but insufficient – plans for investing in Roma education assistants	Some targets but not realistic
Lower quality of pre-school education and ECEC services for Roma	Significant problems but according to Government Roma culture is responsible for	Mentioned but not analysed sufficiently	Present but insufficient	Absent
High drop-out rate before completion of primary education	Critical problems but according to government - Roma culture responsible for	Mentioned but not analysed sufficiently	Present but insufficient – strong believe in Roma education assistants, however, not clear responsibility associated with Roma parents	Some targets but not realistic
Early leaving from secondary education	Critical problems but according to government - Roma culture responsible for	Mentioned but not analysed sufficiently	Present but insufficient	Some targets but not realistic
Secondary education/vocational training disconnected from labour market needs	Critical problems but according to government - Roma culture responsible for	Mentioned but not analysed sufficiently – responsible early marriages and pregnancy	Present but insufficient	Absent
Misplacement of Roma pupils into special education	Significant problems	Mentioned but not analysed sufficiently	Present but insufficient – reform of psycho- and pedagogical commissions and	Absent

			possibility of joining them by Roma education assistant as a way of solving issue	
Education segregation of Roma pupils	Irrelevant - according to Government	Mentioned but not analysed sufficiently	Absent	Absent
Increased selectivity of the educational system resulting in concentration of Roma or other disadvantaged pupils in educational facilities of lower quality	Irrelevant – according to Government; no ghetto type communities and schools...	Mentioned but not analysed sufficiently – the fact that so high % did not progress to get to secondary education tells a lot about quality of education facilities and achievements	Absent	Absent
Limited access to second-chance education, adult education, and lifelong learning	Minor problems – according to Government	Mentioned but not analysed sufficiently – Roma culture responsible for ineffective adult education or live long learning	Absent	Absent
Limited access to and support for online and distance learning if education and training institutions close, as occurred during the coronavirus pandemic	Significant problems	Mentioned but not analysed sufficiently – Roma culture responsible for or the level of education. Roma education assistants see it differently – as limited access and support for...	Absent	Absent
Low level of digital skills and competences and limited opportunities for their development among pupils	Significant problems due to high % of Roma who do not finish primary or drop out from education	Mentioned but not analysed sufficiently	Absent	Absent
Low level of digital skills and competences and limited opportunities for their development among adults	Significant problems due to high% of illiterate Roma adults...	Mentioned but not analysed sufficiently	Absent	Absent

## Healthcare

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
Exclusion from public health insurance coverage (including those who are stateless, third country nationals, or EU-mobile)	Irrelevant – according to Government Roma minority in Poland have such access to public health insurance. Very few if any stateless, third country nationals or EU mobile Roma; they move out from Polish territory and are forbidden to enter again.	Irrelevant	Absent	Absent
Poor supply/availability of healthcare services (including lack of means to cover out-of-pocket health costs)	Minor problem – according to the Program, however, significant problem for many Roma families who are unable to cover health services	Irrelevant – according to Program	Absent	Absent
Limited access to emergency care	Minor problem – according to the Program, however, significant problem for many Roma families – often emergency care rejects Roma call for assistance	Irrelevant according to the Programme but not analysed sufficiently	Absent	Absent
Limited access to primary care	Minor problem – according to the Program	Irrelevant	Absent	Absent
Limited access to prenatal and postnatal care	Minor problem – according to the Program	Irrelevant	Absent	Absent
Limited access to health-related information	Minor problem – according to the Program	Irrelevant	Absent	Absent
Poor access to preventive care (vaccination, check-ups, screenings, awareness-raising)	Significant problem but Roma themselves responsible for or their culture re: healthy life-styles	Mentioned but not analysed sufficiently – blaming Roma culture for	Present but insufficient – finally - all depends on the level of	Absent

about healthy lifestyles)			education, which is prioritised	
Poor access to sexual/reproductive healthcare and family planning services	Minor problem – according to the Program, but in reality right-wing ruling coalition , in general, limits access to sexual/reproductive healthcare and 500+ was aimed at raising the level of women’s reproductively	Irrelevant – according to the Program	Absent	Absent
Specific barriers to better healthcare of vulnerable groups such as elderly Roma people, Roma with disabilities, LGBTI and others	Minor problem – according to the Programme but some categories, for example, LGBTI , encounter significant problems – they are discriminated against by mainstream (official policy of right-wing ruling coalition and are, at best, treated with suspicion by Roma communities	Irrelevant – according to the Program	Absent	Absent
Discrimination/ antigypsyism in healthcare (e.g., segregated services, forced sterilisation)	Minor problem – according to the Program; the word <i>antigypsyism</i> does not mentioned, at all; discrimination is not prioritised in this area either; there are no examples of forced sterilisation or segregated services	Mentioned but not analysed sufficiently – discrimination is mentioned as horizontal issue, that is why no specified as specific area; according to the program, Roma themselves and their projects do not value such focus – only around 6% of Roma projects focused on issues of discrimination	Present but insufficient – according to drafter, the Programme is sufficiently plastic to respond to all ideas of implementers and ‘innovative’ projects are container for them, i.e. projects addressing discrimination, but Roma themselves do not value them	Absent
Unrecognised historical injustices, such as forced sterilisation	Irrelevant	Irrelevant	Absent	Absent
Inequalities in measures for combating and preventing potential	Minor problem – according to the Programme – typically in remote	Mentioned but not analysed sufficiently	Absent	Absent

outbreaks of diseases in marginalised or remote localities	and marginalised communities of Bergitka Roma in southern Poland			
--	--	--	--	--

### *Housing, essential services, and environmental justice*

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
Poor physical security of housing (ruined or slum housing)	Significant problems but for Bergitka Roma in southern Poland	Understood with limitation – housing issues are encountered not only by Bergitka Roma but also by other groups in Poland, especially, those who from the end of the WWII until late 80-ties were 'nomadic' and were settled forcefully in barracks in the outskirts of the cities	Present but insufficient – this area for Bergitka Roma is prioritised; the rational is that improving housing condition will help children in education	Some targets but not relevant – relates to finances devoted to improvements in housing for Bergitka Roma
Lack of access to drinking water	minor problems			
Lack of access to sanitation	minor problems			
Lack of access to electricity	minor problems			
Limited or absent public waste collection	minor problems			
Restricted heating capability (families unable to heat all rooms/all times when necessary) or solid waste used for heating	minor problems			
Lack of security of tenure (legal titles are not clear and secure)	Significant problems	Mentioned but sufficiently addressed – legal titles are not clear and secure for majority of Roma in Poland, both for Bergitka (usually their	Present but insufficient	Absent

		legal titles are not clear) and for other groups who are city dwellers (majority) and are placed in city's social housing (it is not clear how to do in such housing improvements – from the budget of the Programme or from the budget of local authorities		
Overcrowding (available space/room for families)	Significant problems	Mentioned but sufficiently		
Housing-related indebtedness at levels which may cause eviction	Significant problems	Mentioned but sufficiently		
Housing in segregated settlements/ neighbourhoods	Minor problem – typical for settlements of Bergitka Roma	Mentioned but sufficiently		
Housing in informal or illegal settlements/ neighbourhoods	Mentioned but sufficiently			
Exposure to hazardous factors (living in areas prone to natural disasters or environmentally hazardous areas)	Irrelevant	Irrelevant	Absent	Absent
Limited or lacking access to public transport	Minor 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 – according to the Programme but significant to Roma education assistants in the period of pandemic Covid-19 and distance learning – Roma children missing access to internet and computers	Absent	Absent

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

### Social protection

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
High at-risk-of-poverty rate and material and social deprivation	Significant problems, however, and mainly for Bergitka Roma; in reality issues with high-risk-of-poverty relates to other groups, as well	Mentioned but not analysed sufficiently, predominantly it is argued that Roma level of education is responsible for, so they are guilty themselves	Present but insufficient –the Programme makes distinction between what it does (finance) and what the ESF or Brussels does for getting out Roma from material and economic deprivation	
Income support programmes fail to guarantee an acceptable level of minimum income for every household	Irrelevant – according to the programme but significant problems in reality of many Roma families in Poland	Irrelevant	Absent	Absent
Limited access to income support schemes (low awareness, barrier of administrative burdens, stigma attached)	Irrelevant according to the program	Irrelevant according to the Program	Absent	Absent
Ineffective eligibility rules (well-designed means-testing ensures that those who need support can get it; job-search conditions ensure the motivation for returning to work)	Irrelevant according to the Programme but significant problems in reality – the programme stipulates that all depends on education and Roma are guilty themselves.	Irrelevant	Absent	Absent
Low flexibility of income support programmes for addressing changing	Irrelevant	Irrelevant	Absent	Absent

conditions of the household				
Discrimination by agencies managing income-support programmes	Irrelevant according to the Programme as Roma level of education determines their jobs and incomes. It does not address the issue of discrimination in this area	Irrelevant	Absent	Absent
Risk of municipalities misusing income support to buy votes	High risk – (issue of centralisation of some municipalities) mentioned national programmes are interpreted by the opposition as buying votes or propaganda	Not identify in the Programme		

### Social services

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
Limited quality, capacity and comprehensiveness of help provided by social services				
Limited access to social services: low awareness of them, low accessibility, (e.g., due to travel costs) or limited availability	Accessible due to the fact that most of Roma (92%) live in urban settings and have direct access to social services	mentioned but not analysed sufficiently	The Programme makes measures in area of education universal to all other areas. The rational is the following: improvement in education will improve access to social services. In reality this is not the case. Roma school mediators are indispensable in such situations	Absent
Services providers do not actively reach out to those in need	Accessing social services require knowledge and competencies	Irrelevant	Absent	Absent

	usually Roma marginalised families do not have. Required assistance from Roma school mediators.			
Limited ability of social services to effectively work together with other agencies (e.g., public employment service) to help clients	No examples of working together with other agencies discussed	Not identified in the Programme	Absent	Absent
Discrimination by social service providers	Social services claim they do not discriminate against any minority. Examples show an opposite situation (see the example of buying social house for several Roma inhabitants in other municipality because the former one did not like Roma neighbours.	Identified the case but the Programme suggest municipality should proceed with buying house in another municipality under certain conditions.	Absent	Absent
Lack of adequacy of programmes for addressing indebtedness (providing counselling and financial support)	Few projects are realised re: indebtedness but this is a large issue among marginalised Roma families	Not discussed in the Programme	Absent	Absent

### Child protection

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
Child protection not considered in the NRSF	According to the Programme it is irrelevant issue – antigypsyism is not even mentioned in it. General policies and activity of social care centres address the issue in 'colour-blind' policies.	Irrelevant. However, knowledge of the issue is limited among scholars and among Roma or outdated. It impacts the knowledge of the state.	Absent	Absent
Specific vulnerability of Romani children as	Significant problems according to the Programme as Roma children	Irrelevant. However knowledge of the issue is limited	Absent	Absent

victims of violence not considered	and women and girls are categories named in the Programme as subjects of discrimination and considered for state support.  However, the Programme relates these issues to own community (patriarchal) or Romani culture.	among scholars and among Roma or outdated.		
Segregated or discriminatory child-protection services provided to Roma	Irrelevant  Municipal centres apply 'colour-blind' policy irrespective of ethnicity of a person	Irrelevant	Absent	Absent
Activities aimed at strengthening parental responsibility and skills not available or not reaching out to Roma parents	Significant problems. According to the Programme Roma children a category named for support, however, within priority area of education. Efforts are directed to limit impact of Roma parents and families on children and increase the impact of the school, including Roma education mediators.	Mentioned but not analysed sufficiently.	Present but insufficient. Some measures relates to the civic education, additional remedial classes and reform of the pedagogic-psychological commissions and increase the number and role of Roma education mediators, but not Roma parents.	Some targets but not relevant,  Confusing and unrealistic.
Illegal practices of child labour	Irrelevant	Irrelevant	Absent	Absent
Large-scale and discriminatory placement of Romani children in early childhood care institutions	Irrelevant - knowledge of the issue is limited among scholars and among Roma or outdated	Irrelevant - knowledge of the issue is limited among scholars and among Roma or outdated	Absent	Absent
Persistence of large-scale institutions rather than family-type arrangements	Irrelevant	Irrelevant	Absent	Absent
Early marriages	Significant problems according to the Program;	Understood with limitations	Present but insufficient; Roma women and	Some targets but not relevant

	Roma culture is blamed for; misinterpreted data, following the scheme – blame the victims		girls are considered a category discriminated by own culture and in need of support	
Barriers to children's registration; statelessness	Irrelevant	Irrelevant	Absent	Absent
Biased treatment of Roma youth by security and law enforcement	Irrelevant but in reality an issue	Understood with limitations	Present but insufficient; the programme mentions projects done by law enforcement agencies, the activities of the police's and Justice ministry's human rights officers and general policy of these institutions of free legal advice, however, there is no evidence that the latter is working for Roma youth and community.	Absent
Inadequate child/ adolescent participation	Irrelevant	Irrelevant	Absent	Absent

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

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
Poor or lacking awareness of the general population of the contribution of Roma art and culture to national and European heritage	Significant problems as few are reaching tertiary education	Mentioned but not analysed sufficiently – usually these include ceremonies highlighting International Roma Day, Romani flag or language	Present but insufficient - by Roma experts described as 'folklorisation', i.e. supporting Roma dancing and singing	Some targets but not relevant
Exclusion of Roma communities from national cultural narratives	Significant problems – majority's dominant narratives are	Mentioned but not analysed sufficiently -	Present but insufficient – according to the Programme – integration of Roma may	Some targets but not relevant, i.e. building commonality with majority is a long historic process and

	present and visible in media or in school and the views of Roma minority hardly find the way to challenge the majority's views.		happen through 'patriotic' and 'historic' education and building 'commonality of experiences' of majority and Roma. However, building such a commonality depend much on many factors and histories, among them on history of mutual relationship in which Roma minority were considered classic 'other' (experiences during the WWII were different of Poles and Roma)	the Programme says nothing how realistically ca be achieved.
Romani history and culture not included in school curricula and textbooks for both Roma and non-Roma students	Irrelevant problem according to the Programme but significant according to reality – Romani history and culture are not included into textbooks for Roma and non-Roma	Mentioned but not analysed sufficiently – usually school authorities organise Roma days for knowing better their history and culture; some role is to be played here by Roma education assistants	Present but insufficient – sensitisation of clerks and teaching staff regarding Roma history (events to memorise killings during WWII or Romani flag) or culture - understood mostly as folklore	Absent
Lack of inclusion of Romani language in schools, and development of necessary educational materials and resources for Romani language preservation and teaching	Irrelevant problem according to the Program	Irrelevant as Roma themselves do not ask for such possibility, besides, they are spread all over Poland and do not form local majority that would enable them, to recall provision of the Minority law (2005)	Absent	Absent
Lack of memorialisation of Roma history through establishing monuments, commemorative activities, and institutionalising dates relevant to Roma history	minor problems - some activities in this area are supported by the Programme	Mentioned but not analysed sufficiently – some ceremonies memorialising Roma history's dates are organised by Roma organisations and	Present but insufficient	Absent

		are supports by the Programme		
--	--	----------------------------------	--	--

## HOW TO OBTAIN EU PUBLICATIONS

### Free publications:

- one copy:  
via EU Bookshop (<http://bookshop.europa.eu>);
- more than one copy or posters/maps:  
from the European Union's representations ([http://ec.europa.eu/represent\\_en.htm](http://ec.europa.eu/represent_en.htm));  
from the delegations in non-EU countries  
([http://eeas.europa.eu/delegations/index\\_en.htm](http://eeas.europa.eu/delegations/index_en.htm));  
by contacting the Europe Direct service ([http://europa.eu/europedirect/index\\_en.htm](http://europa.eu/europedirect/index_en.htm))  
or calling 00 800 6 7 8 9 10 11 (freephone number from anywhere in the EU) (\*).

(\*). The information given is free, as are most calls (though some operators, phone boxes or hotels may charge you).

### Priced publications:

- via EU Bookshop (<http://bookshop.europa.eu>).

