



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

Prepared by:

RGDTS Nonprofit KFT
Romaversitas Alapitvány
UCCU Roma Informális Oktatási Alapítvány
1Magyarország Mozgalom
Autonomia Alapítvány
Civil Tanács Egyesület
Amari Kris Cigány Szervezet
Szubjektív Ertekek Alapítvány
Diverz Ifjúsági Hálózat
June 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 Hungary

Manuscript completed in June 2022

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.

PDF	ISBN 978-92-68-00864-5	doi: 10.2838/430938	Catalogue number DS-05-23-072-EN-N
-----	------------------------	---------------------	------------------------------------

How to cite this report:

Roma Civil Monitor (2023) *Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Hungary*. Publications Office of the European Union, Luxembourg.

Luxembourg: Publications Office of the European Union, 2023

© European Union, 2023

Reuse is authorised provided the source is acknowledged and the original meaning or message of the document is not distorted. The European Commission shall not be liable for any consequence stemming from the reuse. The reuse policy of European Commission documents is implemented by Commission [Decision 2011/833/EU of 12 December 2011 on the reuse of Commission documents](#) (OJ L 330, 14.12.2011, p. 46).

The report was prepared by Ms Adrienn Kovacs, an independent consultant, on behalf of the Hungarian Roma Civil Monitor national coalition, including:

- RGDTS Nonprofit KFT (coordinator)
- Romaversitas Alapítvány
- UCCU Roma Informális Oktatási Alapítvány
- 1Magyarország Mozgalom
- Autonómia Alapítvány
- Civil Tanács Egyesület
- Amari Kris Cigány Szervezet
- Szubjektív Értékek Alapítvány
- Diverz Ifjúsági Hálózat.

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) under 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 herein.

CONTENTS

LIST OF ABBREVIATIONS	6
EXECUTIVE SUMMARY	7
INTRODUCTION	8
1. PARTICIPATION	11
1.1. Roma participation in the NRSF preparation	11
1.2. Roma participation in the NRSF implementation, monitoring, and evaluation	13
1.3. System of policy consultation with civil society and stakeholders	14
1.4. Empowerment of Roma communities at the local level.....	15
1.5. Capacity-building of Roma civil society	16
1. RELEVANCE	17
1.1. Fighting antigypsyism and discrimination.....	17
1.2. Education	18
1.3. Employment	20
1.4. Healthcare.....	20
1.5. Housing, essential services, and environmental justice	21
1.6. Social protection (income support).....	22
1.7. Social services	23
1.8. Child protection	23
1.9. Promoting (awareness of) Roma arts, culture, and history	24
2. EXPECTED EFFECTIVENESS	26
2.1. Coherence with related domestic and European policies.....	26
2.2. Responsibility for NRSF coordination and monitoring	26
2.3. Quality of the plan	27
2.4. Funding	28
2.5. Monitoring and evaluation.....	29
2.6. Assessment of the expected effectiveness and sustainability	30
3. ALIGNMENT WITH THE EU ROMA STRATEGIC FRAMEWORK	32
3.1. Reflecting diversity among Roma.....	32
3.2. Combining mainstream and targeted approaches.....	33
3.3. Usage of instruments introduced by the Council Recommendation	34
4. ADDITIONAL FINDINGS	36
CONCLUSIONS AND RECOMMENDATIONS	39
REFERENCES	41
ANNEX: LIST OF PROBLEMS AND CONDITIONS	46

LIST OF ABBREVIATIONS

CMR	Civil Monitoring Report
CSO	Central Statistics Office
CSO	Civil society Organisation
ELTE	Eötvös Loránd University
ETA	Equal Treatment Authority
EU-RSFEIP	EU Roma Strategic Framework for Equality, Inclusion and Participation
FETE	catching-up settlements
HNSIS	Hungarian National Social Inclusion Strategy
NRCP	National Roma Contact Point

EXECUTIVE SUMMARY

The 'Hungarian National Social Inclusion Strategy 2020-2030' (HNSIS) attempts to base its intervention areas and values on the 'EU Roma Strategic Framework 2020-2030', although it is best described as an inclusive but not exclusive policy document. It addresses the Roma community as part of Hungary's most deprived population, but refuses to exclusively target them, which means that the HNSIS as a whole aims to form and implement mainstream policies that generally target people in poverty. This broad policy approach to Roma inclusion impedes evaluators and independent stakeholders from truly learning about the effectiveness of approaches and hinders their monitoring and assessment of the results in significant ways. One of the strategy's most serious flaws is that it does not even attempt to formulate quantifiable goals and targets for broader policy and sub-policy areas. While it showcases a few initial targets for improvement in eight randomly selected programmes or policy areas, we have no way of understanding what the HNSIS aims to achieve in all identified problem areas.

Participation

The HNSIS has been drafted and finalised in a way that includes very little reflection on truly independent civil society opinions. While consultation mechanisms have been flagged by the National Roma Contact Point and within the HNSIS, those channels are dysfunctional and non-transparent and imply the necessity of value alignment with the current government. Real independent or dissenting voices only had a chance to review the 200-page document within such a short period of time that it was impossible to truly analyse the intervention areas, much less define extensive implementable activities.

Relevance

The depth of problem analysis in the HNSIS varies topic by topic. While in some policy areas it extensively analyses the emerging complex problems, in others, it barely skims the surface of the real issues. The interventions are fragmented and completely lack a presentation of policy areas in a horizontal manner. It refuses to make changes to the big policy system, which without true transformative policy measures cannot be implemented.

Expected effectiveness

As mentioned above, the notable deficiency of quantifiable goals will hinder any proper assessment of whether the HNSIS will meet its goals and whether it is on track. The current HNSIS uses the same intervention and programmes which it used in the previous strategy. That means there is no room for innovation or even for understanding what the expectations are in relation to these programmes. As the HNSIS does not use a horizontal approach to problem areas, and attempts to tackle the issue of Roma inclusion in a programmatic manner, we cannot expect the strategy to be effective.

Alignment with the EU Strategic Framework

The 'EU Strategic Framework' emphasises the diversity of Roma people and the importance of tackling discrimination and antigypsyism through the strategy. Unfortunately, these important values and areas of intervention are not reflected in the HNSIS in an overarching manner. The HNSIS does not take into account LGBTQ+ people and considers that Roma identity can be strengthened through just a few weakly planned cultural representation elements. Furthermore, while discrimination and antigypsyism are mentioned sporadically, it makes no mention of how Hungary's political environment, decline in democracy, institutions, and general public attitude contribute to the living conditions and life of the Roma community.

INTRODUCTION

The previous few years have seen a whirlwind of events that have impacted countries around the world, including Hungary.

The Covid-19 outbreak, Russia's war on Ukraine, and general elections have all landed on the heads of Hungarian residents, authorities, and civil society, but such crises and political battles always have the greatest negative impact on the country's most marginalised and impoverished groups. Even if we take one issue at a time, such as Covid-19, there are multiple pre-existing persistent disadvantages experienced by the Roma community which are being amplified through and in the aftermath of the pandemic, as noted in a working paper published by the European Parliament.¹

The Hungarian Roma population, estimated at 876,000,² is the country's largest minority group.³ State policies aimed at the Roma population have existed for decades, addressing a wide range of complex issues such as housing, employment, education, and health.

While state and EU policies tend to remain close to these 'traditional' intervention areas, and any change introduced into the larger framework is a slow burn process, civil society has been emphasising the need to address additional policy areas for decades. As a result, important topics such as culture, the recognition of antigypsyism, police brutality, gender, and LBGBTIQ+ have been on the agendas of the majority of Roma rights organisations.⁴

National Roma strategic framework

Both the previous and the current 'Hungarian National Social Inclusion Strategy' (HNSIS)⁵ do not exclusively target Roma, but also the impoverished. Although the government officially classifies the Roma community as the poorest of the poor, their position is linked with that of other materially deprived people, creating difficulty with the analysis of real results and policies. The social inclusion strategy created by the Hungarian government might be best described as explicit but not exclusive to its target population. According to data published by the Hungarian Central Statistics Office (HCSO), in 2020 the proportion of people living in severe material deprivation among the Roma population was 46.3% compared to the 7% of the non-Roma population.⁶ Even if we only consider this wider indicator and do not dig deeper into the subcategory, such a disproportionate share does not justify drafting a strategy which does not target exclusively the Roma population.

¹ European Parliament, '[The Impact of the Coronavirus Crisis on Roma and Travellers](#)', 2021.

² János Péntes, Patrik Tátrai, and István Zoltán Pásztor, '[A Roma Népeesség Területi Megoszlásának Változása Magyarországon Az Elmúlt Évtizedekben](#)' (University of Debrecen, 2018).

The Council of Europe estimates that there are approximately 750,000 Roma living in Hungary (7.05% of the population).

³ It is important to note that the number of Roma identified in this text is an approximate number, and there are different ways of collecting population data which result in different estimations of the size of the community. Therefore, it is not surprising that we can find population numbers at the lower end of the scale, such as 316,000 people according to the Hungarian Population Census from 2011.

⁴ 'Egalipe', accessed 29 May 2022, <https://www.egalipe.hu>.

⁵ Hungarian Government, '[Hungarian National Social Inclusion Strategy 2030](#)' (Ministry of Interior of Hungary, 2021).

⁶ Hungarian Central Statistics Office, '[Súlyos Anyagi Deprivációban Élők Aránya Nem, Korcsoport, Iskolai Végzettség, Gazdasági Aktivitás, Háztartástípus Szerint](#)', 2021.

The HNSIS 2020-2030 was adopted by the Hungarian government on 1 August 2021 and the 'First Action Plan' for the cycle of 2020-2024 was published within the same year, a month apart from the strategy.⁷

According to an official document provided by the National Roma Contact Point (NRCP), the consultation with civil society and relevant bodies was a two-round process, with each step being followed by an edited and improved version of the strategy. After the first round of consultations in 2020, the first draft of the HNSIS was sent to partner organisations for revision. For full civil consultation, the draft strategy text was published through the Romagov⁸ platform. The government's second and final round of consultation took place between 7 December 2020 and 5 January 2021.⁹ While at first glance these consultations appear to tick all the right boxes for meaningful contribution from civil society, one must consider that the time available for feedback was nowhere near sufficient to revise a 200-page strategic document. Furthermore, the channels for including diverse and/or dissenting feedback did not appear anywhere as an important aspect of an all-around consultation, and leave us believing that the kind of opinion and review the authors were looking for was rather those who share the same beliefs and practices and involved very limited, closed political circles.

About this report

This monitoring report serves as the first round of monitoring of the new HNSIS (sometimes referred to as the 'Roma inclusion/integration strategy') which was developed to reflect the '2020-2030 EU Roma Strategic Framework for Equality, Inclusion and Participation' (EU-RSFEIP)¹⁰ and the Council of Europe's recommendations on the matter.¹¹

The purpose of this report is to provide participatory and inclusive monitoring of the design and implementation of the HNSIS by civil society actors and related international and national sources. Furthermore, it provides feedback to national authorities and informs the European Commission's monitoring of EU-RSFEIP for 2020-2030.

As the first in a series of 'Roma Civil Monitoring' reports, this analysis will concentrate on the assessment of the new HNSIS and its related documents in the form of policy discourse rather than analysing the implementation of specific policies and measures. The primary focus of this report is government policies, programmes, and initiatives.

The report provides an analysis and a comparison of the HNSIS using the following criteria: *Participation, Relevance, Expected Effectiveness and Alignment with the EU Roma Strategic Framework* and concludes with a set of recommendations relevant to each chapter.

The report was prepared and interviews were conducted on the behalf of the Hungarian CMR, and were prepared by Adrienn Kovacs, an independent consultant and a graduate of Central European University with a background in public policy and social justice. The interviews were conducted by Melanie Nagy, a volunteer at the Civil Council Association

⁷ Government of Hungary: '[A Kormány 1619/2021. \(IX. 3.\) Korm. határozata a Magyar Nemzeti Társadalmi Felzárkózási Stratégia 2030 végrehajtásának a 2021–2024. évekre szóló kormányzati intézkedési tervéről](#)', eGov Hírlevél (blog), 5 September 2021.

⁸ 'romagov', accessed 9 May 2022, <https://romagov.hu/>.

⁹ Laszlo Ulicska, Interview with the National Roma Contact Point on the Hungarian National Roma Integration Strategy 2020-2030, 27 April 2022.

¹⁰ European Commission, '[A Union of Equality: EU Roma Strategic Framework for Equality, Inclusion and Participation for 2020-2030](#)' (2020).

¹¹ Council of Europe, '[Council of Europe Recommendations of 12 March 2021 on Roma Equality, Inclusion and Participation](#)', 2021.

(*Civil Tanács Egyesület*), a coalition member which is participating in the assessment of the HNSIS 2020-2030.

Desk research, academic literature, interviews, and publicly available data were used to create the report. It incorporates data and information from government publications, referenced materials, and local civil society experiences. The report has been written based on a series of consultations with the RCM coalition members, and their input appears in each chapter of the document. Interviews were conducted with seven civil society organizations, one statistics office, and three government-related authorities, including the National Roma Contact Point, the Ministry of Interior, and one minority rights representative body.

1. PARTICIPATION

1.1. Roma participation in the NRSF preparation

The meaningful participation of target groups in policymaking, such as citizens, grassroots organisations, and advocacy groups, is a critical component of democratic, efficient, and inclusive governance.¹² Roma engagement in equality policies is critical, especially when it comes to the approval of long-term strategic policy documents like the HNSIS, which sets out to directly address their needs and provide methods for solving the most critical policy issues. Equal participation of Roma entails their participation at all levels, including in consultation, planning, implementation, monitoring, and evaluation.

To be able to speak about inclusive participation and decision-making in Hungary, we should first identify what the current state of democracy in the country is. For the last two years, Freedom House has classified Hungary's governance as a Transitional or Hybrid regime and considers it 'Partly Free' in terms of political rights and civil liberties. Compared to other EU Member States, Hungary continues to steadily maintain the lowest score on these two indexes with a yearly declining tendency in the last decade. This stipulates that the government does not effectively encourage consultation and cooperation with civil society on political matters. Freedom House's country profile affirms that Hungary shows autocratic tendencies with increasing disregard for the rights of disadvantaged populations, as local civil society organisations are subjected to governmental pressure and hostility. In recent years, members of the current (Fidesz) government have used derogatory rhetoric against Roma, and the underrepresentation of Roma in politics and governance remains an issue.¹³

When determining whether the HNSIS was created in a participatory manner, it is important to consider where the information came from, who provided the answers, what kind of political values they embody, and the entire history and relationships that an organisation, representative body, or individual has built up over time. As a result, some people see civil society engagement (including with Roma and pro-Roma actors) as a success, while others see it as a complete failure. The dissenting opinions on the consultations are in itself themselves an indication of the huge problem with the inclusivity, or rather exclusivity, of independent civil society voices. We believe that we cannot deem a consultation successful if a large part of civil society has been excluded or given no appropriate channel or time to offer feedback on a strategy that will affect the lives of hundreds of thousands of individuals. Furthermore, just the fact that we have to consider the background of the person who forms the opinion about the consultation process to such an extent clearly shows that the problems go far beyond the lack of consultation process and permeate governance and national dynamics to a greater extent.

According to the HNSIS 2030, their inclusion policy is based on the principle of 'nothing about them without them', implying that the Hungarian government intends to implement social inclusion measures in collaboration, and emphasising that inclusion is both a majority and minority issue.¹⁴

Given the diametrically opposed opinions about the consultations process, it is worthwhile describing the stakeholders in this section. The 'National Roma Contact Point' (NRCP) sent a one-page document outlining how the consultation procedure has evolved over time. In

¹² Marek Hojsik, Georgeta Munteanu, and Violetta Zentai, *From The Shadow to the Limelight - The Value of Civil Society Policy Monitoring Knowledge in Roma Equality Struggles*. (Center for Policy Studies and the Democracy Institute, 2022), 14-15.

¹³ Freedom House, 'Hungary: Freedom in the World 2022 Country Report', Freedom House, 2021, <https://freedomhouse.org/country/hungary/freedom-world/2022>

¹⁴ Hungarian Government, 'Hungarian National Social Inclusion Strategy 2030', 163.

preparation for HNSIS, the government held several territorial consultation forums in early 2020 with non-governmental organisations, local governments, church organisations, experts from educational and social institutions, and economic actors to discuss the areas of intervention and directions of HNSIS. While this looks like quite extensive stakeholder inclusion, in relation to the declining state of democracy in Hungary it is important to stress that there are two sides to every coin. This means that in many fields CSOs are divided into groups of quasi-civil and church-affiliated pro-government organisations, and reviled anti-government ones. Hence, while non-governmental organisations might appear on the list of consulted actors, they are definitely not part of the group branded anti-governmental actors.¹⁵ Sadly, it appears that dissenting opinion is branded 'anti', although the latter should be part of a healthy democratic environment. According to NRCP, nearly 300 people representing approximately 150 organisations participated in the first round of consultations held at Roma Platform events in Salgótarján, Békéscsaba, Szeged, and Berkesz. The second draft text was made available for comment on an online platform from 7 December 2020 until 5 January 2021. Hundreds of ideas, suggestions, and comments were received from approximately forty organisations, including local governments (county and capital), churches, and non-governmental organisations, according to the NRCP. According to the NRCP, the text of the final strategy integrated a major portion of the proposals.¹⁶ NRCP offered evidence of this to the interviewer in the form of a table, where the names and suggestions of all individuals and organisations are accounted for and it is recorded whether each suggestion was accepted or a short explanation was given for its rejection. It is important to emphasize that while this part of the consultation seems quite transparent and satisfactory, the related suggestions are extremely difficult to find in most of the text. As mentioned in this report, the new strategy is written in a way that is quite general, and its structure makes it difficult for the reader to establish direct connections between the different policy areas and interventions. Furthermore, we cannot brand this valuable dialogue between civil society and the government if civil society is not given sufficient time to contribute to the strategy and has no chance to engage in real dialogue, in which observations and suggestions can be discussed openly. While within the new strategy these consultation structures are mentioned and explained, it was difficult to find any official, written information on how the consultation processes were structured, and who the decision-makers were that were associated with it. Another document (which was half a page in length) was made available to us by NRCP.¹⁷ It briefly refers to the fact that, through their Roma Platform, 150 organisations were consulted in 2020, serving as the first round of consultation for the new strategy. While this information sounds promising, neither the civil society members who were interviewed nor an extensive online search could provide evidence of how organisations could sign up for the consultation process. Furthermore, from the document we cannot identify by name who the 150 organisations were that were consulted through the process, and in what way those conversations shaped the strategy.¹⁸

While the consultation processes took various forms, due to the holiday season the time that was available to thoroughly analyse and provide comments (on a 178-page document) was not more than two weeks in the second round, and less than four weeks

¹⁵ Agnes Kover, 'Captured by State and Church: Civil Society in Democratic Hungary', 2015, 81–90, <https://doi.org/10.1515/9786155225550-009>.

¹⁶ Ulicska, Interview with the National Roma Contact Point on the Hungarian National Roma Integration Strategy 2020-2030.

¹⁷ National Roma Contact Point, 'Document Provided by the NRCP, Briefly Explaining Consultation', 2022.

¹⁸ National Roma Contact Point, 'HNSIS 2020-2030 - Consultation Excel', 2022.

in the third round.¹⁹ The haste in which the strategy was produced was not necessitated by any outside circumstances which could have influenced the government's decision to permit such a short time for consultation.

When asked about involvement, one of the Civil Monitoring coalition members stated the following:

*"In my opinion, there was no real participation. Maybe a week before the decision was made on the versions of strategy there was an official letter which sought consultation on a 150-page document. There was no time for it. Whenever an official statement says that it was written together with Roma organisations, in reality, it means it was written by those Roma organisations who are close to the current political party in Hungary. Those civilians who are independent or have different political thinking would never be involved in the discussion."*²⁰

In this regard, 11 Roma and pro-Roma non-governmental organisations (NGOs) expressed the need for a transparent and public timetable for the consultation mechanism, as well as the forms and techniques of consultation which should be jointly agreed upon with the leadership of the responsible government actors and with the participation of relevant civil society actors.²¹

While a representative of the Secretariat of the Deputy Commissioner for Fundamental Rights Ombudsman did not comment on the political nature of the participation, they confirmed in their own words that:

*"I heard from numerous representatives of Roma and Pro-Roma organisations, that the expected level of participation was nowhere near what happened in reality. Field and grassroots organisations, those who have very concrete knowledge and experience, signalled that they did not feel that there was a genuine effort to include them both in participation and discussion."*²²

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

The HNSIS writes that "Roma civil society and target groups are actively participating in all levels of the strategy and action plan: policy formulation, implementation and monitoring".²³ HNSIS emphasises the role of national and minority governments, as well as church organisations, in encouraging civil society to actively participate in the implementation and monitoring of the HNSIS.

The mechanisms employed in the HNSIS regarding monitoring and evaluation are identical to those utilised and mentioned by the NRCP in the consultation process during the drafting of the HNSIS. This means that any review by civil society would be based on pre-existing relationships between actors, and the same argument about the lack of independent or dissenting voices in collaboration would apply. Furthermore, while umbrella organisations such as the Roma Platform, the Roma Coordination Council, and the Roma self-governance structure appear to be representative mechanisms, it would be great to hear whether all

¹⁹ Báthory Róbert, '[Civilek: A Kormány Romastratégiája Csak Alibi Az Unió Pénzcsapokhoz](#)', Szabad Európa, accessed 8 May 2022, .

²⁰ UCCU Representative, Interview with a Representative from the Roma Informal Education Organisation NGO (UCCU), 5 April 2022.

²¹ [11 Roma and Pro-Roma Organisations, 'Általános Vélemény a Magyar Nemzeti Felzárkóztatási Stratégia Tervezetéről](#)', 2021, 1.

²² Representative, Interview with a Representative from the Secretariate of the Deputy Commissioner for Fundamental Rights Ombudsman for the Rights of National Minorities, 5 April 2022.

²³ Hungarian Government, 'Hungarian National Social Inclusion Strategy 2030', 163.

or at least some of those Roma and Pro-Roma organisations are given the opportunity to participate and contribute critically, and have the grassroots experience to comment on design implementation, monitoring, and evaluation.

When asked what they planned to do to strengthen collaboration with Roma civil society, such as hiring more Roma experts, NRCP referred to the platforms mentioned above and their description in the strategy. While NRCP could not provide the exact number of Roma experts working on the strategy, or what number would be sufficient, he stated that they are doing their best to include others. He mentioned Roma colleges (which are supported by government and church programmes) and how some of the students end up working with them as mediators or experts in the ministry.²⁴ Unfortunately, there are no publicly available documents which would support this statement, and in reality, the HNSIS has no mechanism in place which will enable the active participation of Roma and Pro-Roma experts.

Civil society actors published the following opinion on the visibility of Roma experts and organisations within the new HNSIS:

"With the exception of two organisations [...] not a single Roma or pro-Roma civil society member that has actively been doing fieldwork and using innovative ideas was mentioned as a potential participating partner within the strategy [...and it] does not specifically mention the role of Roma self-governance, or their situation and declining autonomy [...] it is a warning sign that the names of these organisations (UCCU, Romaversitas, Idetartozunk, Roma Polgárjogi Alapítvány, Roma Sajtóközpont, etc.) that would be able to develop the next Roma intellectual generations, and who are able to be partners in the drafting of inclusion policies, implementation and monitoring are just not there. Exactly those dissenting voices are missing who are critical towards any segregation policies and the adverse effect of governmental policies."²⁵

It is worth noting that in the final version of the HNSIS those two Roma organisations appearing as potential partners in the draft HNSIS have faded into the background and no longer appear in any section.

1.3. System of policy consultation with civil society and stakeholders

As previously stated, a deeper analysis by the government of the various umbrella organisations, and the criteria based on why they were chosen, has not been published, or at least has not come to our attention. Continuing with the umbrella metaphor, the government believes that these partners will ensure representation among their members, and does not set out to regulate or supervise their mechanism of participation. While policy consultation events are held in various locations, we do not know whether or to what extent the voice of youth, Roma women, LGBTIQ+, elderly Roma, or Roma with disabilities were represented. The same is true for the list of individuals and organisations who submitted their thoughts for the final consultation.

We cannot speak of nor discuss representation within society when, in general, important civil stakeholders in Hungary do not feel that there is a real opportunity for dialogue regarding state policies and resources. Civil society organizations (CSOs) cooperating in the Civilisation Coalition published an open letter in February 2021 addressed to Dr Szabolcs Ágostházy, the State Secretary for EU Development Programmes, objecting to the lack of dialogue and meaningful civic participation in the development of plans for

²⁴ Ulicska, Interview with the National Roma Contact Point on the Hungarian National Roma Integration Strategy 2020-2030.

²⁵ 11 Roma and Pro-Roma Organisations, 'Általános Vélemény a Magyar Nemzeti Felzárkóztatási Stratégia Tervezetéről'.

the use of EU funds expected in the coming years. Their comments reflect the short deadline within which to revise the documents (including the HNSIS 2030), and the fact that none of the information published about consultations is transparent.²⁶

Working groups that serve as official channels of communication between the government and civil society within the HNSIS consultation process are dysfunctional, meeting only once a year or less frequently, and members are frequently unaware of upcoming legislation or related professional materials, and authorities do not always respond to individual participation and communication requests from NGOs.²⁷ The type of experience that is reported here by 40 NGOs is consistent with the views of several Roma and pro-Roma organisations who were interviewed for this RCM report. While representation is essential during the consultation process, basic mechanisms are dysfunctional, impeding the development of more inclusive policy thinking. When the same mechanisms are used to design, implement, monitor, and evaluate the HNSIS, one has to wonder if it will reflect reality.

1.4. Empowerment of Roma communities at the local level

Political representation is a critical factor for helping a minority group feel more empowered. There is a system of local Romani minority self-government in Hungary, as well as a national one that was established in 1993 and funded by the state. This law provided an opportunity for the establishment of Roma political parties and organizations. These primarily serve as the main political representation channels for Roma within Hungary. Roma political representation has been dominated by the pro-Orbán *Lungo Drom* fraction for several electoral cycles. State interference, as well as a lack of capacity building and internal democracy, have been criticised by many and the extensive corruption of the current ruling party is not hidden from the eyes of the public.²⁸

Although Roma self-governments are mentioned in the HNSIS, it is difficult to envision them as a serious partner in levelling up and empowering Roma communities. In recent decades, all political parties in Hungary have shaped relationship with the Roma self-governments to advance their own agenda, rather than working together and considering Roma governments as a true partner and sharing visions of a better, just society. Even if some Roma municipalities or national representatives wish to act as true partners, they are in a precarious position.²⁹

The HNSIS, on the other hand, emphasises the role of churches and charitable organisations as mechanisms that help empower and include Roma on a local level. Not only civil society commentators but the interviewed representative from the Ombudsman noted this overemphasis on churches and charity functions.

“There is clear stress on the importance of church organisations and the Hungarian Charity Service of the Order of Malta within HNSIS, which would not necessarily be a problem if the main emphasis were not on evangelisation, but on those activities of the church which belong to their core business. Furthermore,

²⁶ [‘Nyílt Levél a Társadalmi Egyeztetésről Dr. Ágostházy Szabolcs Európai Unió Fejlesztésekért Felelős Államtitkár Részére’](#), Civilizáció, accessed 8 May 2022.

²⁷ [‘Nyílt Levél a Társadalmi Egyeztetésről Dr. Ágostházy Szabolcs Európai Unió Fejlesztésekért Felelős Államtitkár Részére’](#).

²⁸ Cristina-Ioana Dragomir et al., [‘Romani Communities and Transformative Change; A New Social Europe’](#), *Human Rights Review* 23, no. 1 (March 2022): 159–61.

²⁹ 11 Roma and Pro-Roma Organisations, [‘Általános Vélemény a Magyar Nemzeti Felzárkóztatási Stratégia Tervezetéről’](#).

through the FETE,³⁰ which is operated by the Order of Malta, the strategy reaches out to 300 settlements in the upcoming decade. Other settlements also need support; there is way more need for community engagement than [just in] those 300 targeted settlements.”³¹

1.5. Capacity-building of Roma civil society

The capacity building of Roma civil society is briefly discussed in the HNSIS chapter on Roma identity, community building, attitude formation, and law enforcement. The National Cooperation Fund is mentioned in the framework as a method of financing organisations’ operations and professional activities. According to the section, 85 percent of grants will be distributed through tenders, with the remaining 15 percent awarded by the Ministry of Development of Civil Relations based on individual grant applications.³² The sections discuss various interventions that help to strengthen civil society, such as Civil Community Service Centres, Roma self-governance, the National minority support system, the missionary role of churches, and Roma pastoral care, among others.

While the strategy identifies a few Roma stakeholder affiliates and the Roma community, no funds are set aside to specifically develop Roma civil society.

“Roma NGOs also need support for building international relations. Currently, with a few exceptions, Roma lack access to other groups living in other countries. There is a need for coordinators who can establish links between Roma and non-Roma organizations in different countries and who can carry out joint projects.”³³

While this observation emphasises the importance of establishing relationships and intellectual exchanges between international Roma and non-Roma groups, it fails to recognise the presently weak and fragmented dialogue between Roma-led organisations and the larger civil society sector on a local and national level, as well as the lack of transparent dialogue between the authorities and civil society. Given all of these realities on the ground, the government’s strategic primary focus of prioritising international collaboration appears to be quite ambitious and rather inconsiderate.

³⁰ More information on the Emerging Settlements Programme can be found here: Hungary Ministry of Interior, ‘Emerging Settlements/ FETE - Felzárkózó Települések’, 2019, at: https://fete.hu/wp-content/uploads/2022/04/felzarkozo-telepulesek_angol_BM.pdf.

³¹ Based on an interview with the Deputy Ombudsman for National Minorities.

³² Hungarian Government, ‘Hungarian National Social Inclusion Strategy 2030’, 145.

³³ Hungarian Government, 144.

1. RELEVANCE

1.1. Fighting antigypsyism and discrimination

Being a member of the Roma population is seen as the second most relevant determinant of disadvantage, according to recent research commissioned by the Hungarian Equal Treatment Authority, and Roma report the largest number of systematic and personal discrimination cases in the survey.³⁴ According to research conducted by the Department of Social Psychology at ELTE PPK and Anna Kende, of all respondents 14% stated they would be willing to help the Roma in some way, 86% said they would never engage with them, and 13% said they would rather join a movement or organisation that is particularly anti-Roma.³⁵ Apart from a lack of interest in Roma issues, ELTE's research found that 50-60% of respondents are neutral and do not expressly agree but do not oppose politicians' use of hate rhetoric against Roma. Only 18% explicitly criticise such behaviour, while the remaining 20% believe it is acceptable.³⁶

Since 2015, the capacity of civil society to bring discrimination lawsuits before a court or body affecting the entire Roma population has significantly decreased. There are extremely few organisations that provide legal representation because many Human/Roma rights advocacy NGOs have ceased to function or have migrated abroad. According to the Civilisation Coalition, capacity-related issues and a lack of funding hinder the operation of many civil organisations. This situation is due to the Hungarian government actively dismantling the system of checks and balances within the governing structure. For the civil society sector, this means that the government has created an environment, through legislation, in which operating is impossible, and obtaining funding from independent sources has dire consequences.³⁷

In a few paragraphs, the HNSIS identifies that, in addition to poverty, antigypsyism contributes to Roma exclusion and segregation. In a few sentences, it identifies potential interventions as strengthening communication to overcome stereotypes, strengthening Roma NGOs, equal access to public services, and promoting Roma/non-Roma social and cultural dialogue.³⁸ While it might recognise that discrimination pervades all policy areas, the HNSIS does not showcase concrete measures within the strategy that can contribute to the systematic and institutional elimination of antigypsyism. Instead of measurable, cross-cutting interventions, we can read about the significance of Romani language and identity, as well as peruse a quick rundown of Roma civil society. While all those cultural elements are important, strengthening Romani language and Roma identity in itself will not change the negative perception of Roma of society and institutions.

Whereas the HNSIS mentions the aforementioned ELTE study regarding the extent to which the majority accepts discrimination against Roma, it makes no reference as to how elected representatives, state officials, or institutions reject Roma equality and render cooperation impossible.³⁹ It makes no mention of how certain party representatives express explicit and implicit hateful opinions about Roma or disregard the injustice Roma

³⁴ Mária Neményi, Bence Ságvári, and Katalin Tardso, '[A Diszkrimináció Személyes És Társadalmi Észlelése És Az Egyenlő Bánásmóddal Kapcsolatos Jogtudatosság](#)' (Hungarian Equality Treatment Authority, 2019), 9.

³⁵ ELTE, '[Előítéletek kontra empátia](#)', ppk.elte.hu, accessed 24 April 2022.

³⁶ ELTE.

³⁷ '[Civilizáció: coalition-building to fight back against government attacks on civil society](#)', Civilizáció, accessed 31 May 2022.

³⁸ Hungarian Government, 'Hungarian National Social Inclusion Strategy 2030', 142.

³⁹ 11 Roma and Pro-Roma Organisations, 'Általános Vélemény a Magyar Nemzeti Felzárkóztatási Stratégia Tervezetéről'.

experience.⁴⁰ Since it does not acknowledge that politicians and civil servants are spreading hate, it is evident that the HNSIS does not discuss any solutions. From their point of view, if there is nothing to analyse, there is no need for a solution.

The Hungarian government's lack of understanding and downplaying of discrimination and antigypsyism are reflected in all policy areas which the strategy touches upon. For example, in terms of education there is no better example than that of Gyöngyöspata, which could represent this lack of understanding. For years, Romani children in this town have been separated from their peers, with many leaving without an education. These children were not permitted to visit the first floor of their primary school, and were instead forced to remain on the ground floor, where facilities such as toilets were inadequate or non-existent. The Debrecen Court of Appeal awarded damages to 63 school students in 2019. Finally, Hungary's Supreme Court upheld the decision, ruling that segregation was unacceptable.⁴¹ Despite a court ruling which found that the historic ethnic segregation of Roma pupils in the town's schools was unlawful, Prime Minister Orbán sought political capital by blocking the pay-out of compensation and labelling the victims "aggressors against the majority".⁴² The Prime Minister himself made statements about the unfairness of monetary damages being awarded to Roma, triggering nationwide hatred against Romani people.⁴³

Recent developments such as the incorporation of the Equal Treatment Authority (ETA) into the office of the Ombudsman jeopardises the application of the equal treatment requirement. While the ETA regularly advocated for the protection of vulnerable groups, the Ombudsman has so far taken no action in the Gyöngyöspata school segregation compensation case, and has not spoken out against a legal amendment that makes it impossible to recognise the gender of transgender and intersex people.⁴⁴ Not only has the fall of human rights institutions placed a pall over the HNSIS, but the prime minister's language regarding Roma has left doubt about whether serious antigypsyism measures will be implemented.

1.2. Education

The segregation of Romani children in schools shows neither indication nor sign of slowing down. Around 45% of Roma children in Hungary attend schools or classrooms where all or the majority of their peers are also Roma. Many processes can be used to describe the type of segregation that occurs in schools.

One example is 'White flight', whereby non-Roma children are relocated from schools by their parents to another school (even if the latter is further away) in which no Roma children attend any classes. This process transforms previously diverse schools into segregated ones where the majority of students that remain, or the entire school, are Roma. Another factor that contributes to segregation is in-class segregation of Roma children, whereby schools place Roma children into classes that are segregated from children of other ethnicities or from the majority Hungarians. This means that Roma children are taught in the same school, but in separate classrooms, and attend and use

⁴⁰ Dr Henriett Eva Dinok, 'Antigypsyism in Public Discourses and Election Campaigns' (Central Council of German Sinti & Roma), accessed 19 August 2022, <https://eriac.org/wp-content/uploads/2021/12/central-council-of-german-sinti-and-roma-2017-election-campaigns-6-dinok.pdf>.

⁴¹ '[Director of segregated Gyöngyöspata school must not get away with assaulting a 12-year-old Romani boy](#)', European Roma Rights Centre (European Roma Rights Centre, May 2020), Hungary.

⁴² '[The Silence over Orbán's Anti-Roma Rhetoric Shames the EU | View](#)', Euronews, 17 June 2020.

⁴³ 'Director of segregated Gyöngyöspata school must not get away with assaulting a 12-year-old Romani boy'.

⁴⁴ '[Nagyon rossz lépés az Egyenlő Bánásmód Hatóság beolvasztása az Alapvető Jogok Biztosának Hivatalába](#)', Magyar Helsinki Bizottság, 25 November 2020.

separate restroom or dining facilities as well.⁴⁵ In 2014, 381 primary and secondary schools were recorded as officially having a Roma population of 50% or higher.⁴⁶

School segregation and school dropout are still prevalent issues in Hungary. The number of villages with exclusively Roma students in a single school as well as the number of racially segregated educational establishments within larger cities is growing.⁴⁷ While segregating schools based on ethnicity is in itself discriminatory, the lack of quality education and resources further aggregates the disadvantage of Roma children. Youngsters from these schools have a minimal chance to continue their studies beyond the compulsory age defined by the state.⁴⁸ Hungary's Public Education Act of December 2011 introduced legislative changes such as reducing the compulsory school-age from 18 to 16, making it easier for students who struggle in school to drop out.⁴⁹ This change greatly contributes to the fact that half of Roma pupils drop out of school, only 24% complete secondary education, and just 5% go on to further education. In comparison, non-Roma students make up 35% of higher education students and 75% of secondary school pupils.⁵⁰

The Hungarian educational system is not only insufficient to compensate for children's socioeconomic disadvantages, but it also reinforces them through local and educational systems of selection and segregation.⁵¹ Political will and how it is implemented through the HNSIS are especially important because examples of segregation in both church and non-church schools are endorsed by the Hungarian state while being explicitly condemned by civil society and the EU. These practices were commented on by a representative from Romaversitas Foundation, who connected this with how these segregation-fuelling practices are apparent within the HNSIS:

"The most blatant example is school segregation. According to the HNSIS, schools are becoming more homogeneous, and schools placed under church maintenance contribute to segregation. Nonetheless, it made no suggestions as to what would be required to stop these processes and [even calls for involving] church organisations in vocational training, so in my opinion, the biggest shortcoming in the field of education and strategy in general is that it does not add anything measurable and does not build on the experience of NGOs with significant experience in the sector."⁵²

The HNSIS is good at identifying educational problems but does not provide solutions or answers to them. One of the most serious issues with this strategy is that there are no quantifiable, measurable goals, and there is frequently a contradiction between the problem and the proposed solution. Segregation is one such topic. The strategy recognizes that segregation is increasing, that an expanding number of schools are coming under church authority, and that this is also a factor in segregation. Despite the identification,

⁴⁵ Katalin Kovács, '[Advancing Marginalisation of Roma and Forms of Segregation in East Central Europe](#)', *Local Economy* 30, no. 7 (1 November 2015): 783–99.

⁴⁶ Gábor Kertesi and Gábor Kézdi, [A Roma Fiatalok Esélyei És Az Iskolarendszer Egyenlőtlenség, vol. BWP 20 \(Budapest: MTA Közgazdaság- és Regionális Tudományi Kutatóközpont Közgazdaság-tudományi Intézet, 2016\)](#).

⁴⁷ [Bureau of Democracy, Human Rights, and Labor, '2019 Country Reports on Human Rights Practices: Hungary'](#), accessed 25 April 2022.

⁴⁸ Education in Hungary is compulsory between the age of 6 and 16.

⁴⁹ Roma Education Fund, '[Changes in Hungary's Public Education Act Hurt Disadvantaged Roma Children and Youth](#)', *Roma Education Fund* (blog), 9 September 2016.

⁵⁰ Idetartozunk Egyesület and Minority Rights Group Europe, '[UPR of Hungary - 39th Session](#)', 2021.

⁵¹ Romaversitas, 'Hungary - Submission by the Romaversitas Foundation for the UN Universal Periodic Review', 23 March 2021.

⁵² Representative, 'Interview with a Representative from the Romaversitas Foundation', 1 May 2022.

the HNSIS makes no attempt to provide a solution to halt these processes, and they are even willing to include churches in vocational training.⁵³

While the HNSIS mentions the intended use of successful early childhood development programmes such as 'Sure Start Children Houses' and 'Tanodas', the effect of these successful programmes fades when children continue their education after kindergarten and attend low-quality segregated schools. Their success is a standalone one, and the effect cannot be tracked systematically throughout the educational journey of segregated Roma children.⁵⁴

1.3. Employment

The over-representation of Roma in public works programmes continues to be observed.⁵⁵ There is an increasing tendency to committing violations of Roma rights in relation to employment, and blatant discrimination in recruitment procedures in the labour market.⁵⁶ Many Roma are helped through state-funded 'public employment programmes' that aim to provide jobs for those who are unemployed and receive regular social assistance.

The HNSIS identifies a few major issues that Roma face in the workplace, including overrepresentation and discrimination in the state-funded public work programme. It goes on to discuss the relationship between educational attainment and unemployment. It mentions successful projects from the previous strategy, but we are not informed whether those projects will be continued or improved, or how and in what way and form they will interlink different programmes in the intervention section. Furthermore, we lack information on how successful of those programmes are, and whether they are really worth continuing.⁵⁷

We will not be able to implement and evaluate if the new HNSIS and its action plans have met their purpose in the future until we are provided with information about improvements and issues associated with such a large-scale programme as the public work programme.

1.4. Healthcare

The pandemic has exacerbated societal inequalities, and while other countries have offered monetary support to their struggling citizens, the Hungarian government did not introduce a safety package to alleviate the shock. Roma communities' major disadvantages, such as segregation, poverty, and direct and indirect discrimination, have become even more alarming and obvious. The pandemic has had a devastating effect on Roma women and children living in segregated areas. Roma women face a lack of appropriate assistance and information in healthcare facilities, and the practice of isolating Roma and non-Roma women in state hospital maternity wards is widespread.⁵⁸ The most pressing healthcare issues among Roma in Hungary continue to be limited access to safe drinking water and sanitation, particularly in segregated areas, limited social security coverage, limited

⁵³ Hungarian Government, 'Hungarian National Social Inclusion Strategy 2030', 60.

⁵⁴ 11 Roma and Pro-Roma Organisations, 'Általános Vélemény a Magyar Nemzeti Felzárkóztatási Stratégia Tervezetéről'.

⁵⁵ Sára Hungler and Ágnes Kende, '[Diverting Welfare Paths: Ethnicisation of Unemployment and Public Work in Hungary](#)', *E-Cadernos CES*, no. 35 (15 June 2021).

⁵⁶ Andrea Spitalásky, '[Roma in the Republic of Serbia and Hungary: The Challenges of Discrimination – A Comparative Report](#)' (Minority Rights Group Europe (MRGE), March 2021), 6.

⁵⁷ Hungarian Government, 'Hungarian National Social Inclusion Strategy 2030', 92.

⁵⁸ The Hungarian Civil Liberties Union and Civic Roma Women of Bódva-völgy, '[Joint Submission to the 3rd Cycle of the Universal Periodic Review by Civil Society Organizations Containing Follow-Up Information on the Previous Reports of the Working Group on the Universal Periodic Review of Hungary](#)' (Tasz.hu, 8 March 2021), 3.

availability and access to medical care, and institutional segregation practices against Roma in hospitals.⁵⁹

The interviewed civil society members and numerous reports comment on the worsening condition of Roma health and discrimination in the health system, while the following sums up the basic principle which the new HNSIS builds on: "Health problems are fundamentally non-Roma specific; they are most often associated with poverty".⁶⁰

While this statement is followed by the observation that Roma health is worst in segregated areas, the HNSIS itself mentions that the health status of Roma has improved overall, based on surveys. Following this, it immediately elaborates on how the national health statistics are negatively affected by the health situation of Roma in segregated areas, as well as how the statistics lack Roma-specific indicators and data that would allow for targeted intervention and monitoring., This means that the HNSIS will not be able to carry out targeted interventions which can be supported with credible claims about improvement in the health of Roma.⁶¹

While the HNSIS recognises that the Hungarian health system is underfunded and that the number of healthcare professionals, particularly midwives, is declining, it presents this as a broader issue without connecting it to how the situation affects the Roma population. Discrimination against the Roma population as a whole, and particularly against Roma women, is not mentioned in the HNSIS Healthcare chapter in the identification and intervention section.⁶²

1.5. Housing, essential services, and environmental justice

Roma communities are concentrated in north-eastern Hungary and southern Transdanubia, with high proportions living in small settlements often located in disadvantaged, peripheral regions. They live mainly in Roma-only settlements or segregated ghettos in cities and towns. The areas where they live are typically deprived of asphalt roads, pavements, and even running water. In many places, asphalt roads, sewer systems and water pipes end at the border of the Roma settlement. There is no garbage collection, and the poor condition of roads means that in the case of a medical emergency ambulances cannot reach such ghettos in the winter or when weather conditions lead to muddy and wet roads, and the only source of drinking water is a public well. This situation is the result of authorities' neglect on both a local and national level, along with discriminatory patterns of investment and a general failure to ensure that people living in Roma settlements enjoy their right to an adequate standard of living similarly to other citizens of Hungary.⁶³

Aside from some problem descriptions, the housing section of HNSIS focuses on naming one major civil society partner in relation to resolving complex issues: the Hungarian Charity Service of the Order of Malta, as mentioned in previous section. The complex housing issues will be addressed through the charity's FETE (Emerging settlements) programme, which aims to assist 300 settlements in Hungary. While the strategy claims that 300,000 people live in these 300 settlements, with Roma being overrepresented, no concrete numbers are provided about how many actual Roma families and individuals are

⁵⁹ The Hungarian Civil Liberties Union and Civic Roma Women of Bódva-völgy, 'Joint Submission to the 3rd Cycle of the Universal Periodic Review by Civil Society Organizations Containing Follow-Up Information on the Previous Reports of the Working Group on the Universal Periodic Review of Hungary'.

⁶⁰ Hungarian Government, 'Hungarian National Social Inclusion Strategy 2030', 131.

⁶¹ Hungarian Government, 131.

⁶² Hungarian Government, 127.

⁶³ Idetartozunk Egyesület and Minority Rights Group Europe, 'UPR of Hungary - 39th Session'.

affected by the programme.⁶⁴ Overall, the Order of Malta charity will be the one that coordinates local organisation contribution, but the strategy does not reveal whether any Roma and Pro-Roma civil society members will be targeted in this contribution.

The HNSIS discusses the issue of social mobility but lacks a clear statement that the only way for a child to achieve well-being as an adult in every sense is to leave the ghetto-like colonies.⁶⁵ It fails to specify specific interventions for eliminating segregation and focuses more on improving the lives of people within those ghettos.

1.6. Social protection (income support)

Today, the net amount of the minimum social support or benefit payment in Hungary only allows for a very elementary level of existence. Income available through public employment is very low, far below the level required for elementary existence. The amount of the family allowance in terms of tax relief or GYES (maternity leave) has not changed since 2008, nor has the size of the minimum pension.⁶⁶ The family tax benefit is difficult for marginalized groups to obtain or qualify for (e.g., hinders those who do daily wage work, live from casual work, or are early school leavers), while CSOK (family housing support), and 'babywaiting credit' (child support program that offers a government-subsidized zero-interest loan up to 10 million HUF (around 30,000 EUR) that could convert into a non-repayable subsidy if three children are born during the term), and support for large families is also unavailable to the most disadvantaged groups, including Roma.⁶⁷

Because payments and services are not focused on the poor, and the wealthy typically have better access to public resources than the needy, the Hungarian welfare system might be best described as a corrupt redistributive practice.⁶⁸

The HNSIS has a specific sub-chapter – three paragraphs to be exact – that describes the family support system and cash benefits, but overall places greater emphasis on project-like interventions, with children and family development at the centre.

It measures related accomplishments in terms of socio-cultural success rather than innovation through reforming and equalizing finances available through the social protection system.⁶⁹ It identifies one of the previously mentioned issues, which is that some of the family housing benefits are only available to those who have continuous work and health insurance. However, the strategy only goes so far as to identify the issue, but provides no solid, implementable policies and solution. Therefore, the strategy could be best described as lacking the necessary content to achieve real results and effects. Needless to say, Roma who frequently engage in low-wage public work, occasional work, or even informal work would be unable to benefit from such a scheme. The HNSIS does not seek to transform large sectoral systems and does not consider how the most marginalised groups, including Roma, are barely making ends meet under the current benefits system.

⁶⁴ Hungarian Government, 'Hungarian National Social Inclusion Strategy 2030', 107.

⁶⁵ 11 Roma and Pro-Roma Organisations, 'Általános Vélemény a Magyar Nemzeti Felzárkóztatási Stratégia Tervezetéről'.

⁶⁶ László Molnár and Bálint Bukovszky, '[2010 Óta Nem Csökkentek a Jövedelmi Különbségek Magyarországon](#)' (GKI GAZDASÁGKUTATÓ ZRT.), accessed 8 May 2022.

⁶⁷ SzocOkos, '[Szubjektív: Halászati És Szociális Kérdésekről...](#)', SzocOkos, 8 March 2021.

⁶⁸ Fruzsina Albert, 'ESPN Thematic Report on In-Work Poverty Hungary', ed. European Commission (European Social Policy Network ESPN, 2019).

⁶⁹ Hungarian Government, 'Hungarian National Social Inclusion Strategy 2030', 42.

1.7. Social services

There are significant problems with the operation of the social welfare system in Hungary that are partly due to financing, partly due to the lack of other resources (e.g., a lack of professionals), and partly of a regulatory-professional nature. While it is indeed true that social worker professionals are not available in vast numbers, their perception of Roma people is very diverse. Child welfare practitioners display a wide range of attitudes and practices, from being deeply understanding and socially aware of how the treatment of majority society impacts the disadvantaged situation of a disproportionate number of Roma, to blaming “Romani subculture” or “Romani culture”.⁷⁰ Negative perceptions affect professional practices and can easily result in the mistreatment of Roma families or a decrease in willingness to truly help and assist them. These negative attitudes highlight the great need for a collective approach that the new HNSIS should have taken to tackle systematic and institutional racism.

While the HNSIS does not propose any measures to challenge racism within institutions, it is all the keener to reshape power relations within social structures. Starting in 2010, the government’s conscious, multi-stage strategy is based on giving churches an increasing role and leverage in the social and child welfare system. According to a government statement from May 2020, 44 per cent of all institutions in the basic services segment are run by churches, compared to 25 per cent in social care. The role of the church in child protection specialist care was 7 per cent in 2010, and increased to 60 per cent by 2021, but the figure is now around 70 per cent.⁷¹

The role of church institutions in social inclusion is discussed in every chapter of the HNSIS. Churches will maintain and strengthen their position in the education sector, and their social service care will be expanded primarily through the aforementioned FETE programme. With this social responsibility, the HNSIS is ready to provide large financial packages to church institutions that, in their own words, do not even reach the needy in the smallest and most deprived areas most of the time.⁷²

1.8. Child protection

Even though deinstitutionalization has been a component of Hungarian child welfare and protection policy for the past 30 years, children in Hungary are still placed in state care institutions far too frequently due to poverty and a lack of community-based preventative and early intervention services. Foster parents are underpaid, kinship care is underfunded, and foster carers and small group homes are located in rural communities. Staff still adhere to the old institutional culture; the voice of children is not heard, and access to schools and services to meet the diverse needs of children is limited.⁷³

The alarming overrepresentation of Romani children in institutional care⁷⁴ appears to be the result of indirect discrimination against Romani families, a lack of clarity in child protection law and policy concerning family separation, and various flaws in the operation of the child protection system that disproportionately affect Romani families. Using a recently published county example, we can see that while the Roma population accounts

⁷⁰ Djordje Jovanović, Robert Kushen, and Ostalinda Maya Ovalle, eds., *Life Sentence: Romani Children in Institutional Care* (Budapest: ERRC, 2011), 46.

⁷¹ SzocOkos, ‘[Egyházi Térnyerés a Szociális Agazatban](#)’, 11 November 2011.

⁷² 11 Roma and Pro-Roma Organisations, ‘Általános Vélemény a Magyar Nemzeti Felzárkóztatási Stratégia Tervezetéről’.

⁷³ Jovanović, Kushen, and Ovalle, *Life Sentence*.

⁷⁴ Norwich Radical, ‘[Blighted Lives: Romani Children In State Care](#)’, *The Norwich Radical* (blog), 5 March 2021.

for less than 20% of the population in Nógrád county, Romani children account for more than 80% of those in state care.⁷⁵

While the HNSIS speaks about positive and improved child protection services,⁷⁶ their understanding of intervention starts after the child or young adult has already been taken out of a family. It speaks about preventative measures, but due to the general nature of the HNSIS we do not know whether they would like to reduce the number of Roma in state care and how they may work on complex programmes for achieving this.

"Some stereotypes would make people think that Romani people would not let their children be taken by state care due to [their desire for] benefits [...] this is extremely silly, and not true. [...]. Because of the mainstreaming nature of policies we can only indirectly make Roma programmes – that means we do not say that this programme is specifically for Roma, but we say we will involve children in state care, and then we try to pull in [involve] the Roma community in the biggest [proportions]. While the state can implement similar programmes, we will never know how many Roma were truly involved in their interventions."⁷⁷

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

This section should have been extremely important within the HNSIS, since Hungarian Roma are not a homogeneous ethnic group but divided into further sub-groups, including *Beas*, *Olah*, and *Romungro*. While the first two groups speak Hungarian fluently, they also have a second (often native) language, and have their own dialect of the Romani language. When analysing any policies aimed at supporting Roma culture, it is extremely important to keep in mind the diversity and colourfulness of culture within the Roma population and identities. People who tell us on a daily basis that we are different and have strong opinions about who we are without even knowing us affect us and our feelings about ourselves. Some of us may be able to ignore this or fight back, but many people fall prey to misconceptions about themselves and believe they are different or worse than others, even if this is not the case.⁷⁸ Roma culture, language, traditions, and national history contribute to a positive identity, while belonging to a group can also include a feeling of pride, joy, satisfaction, but in many cases shame.⁷⁹

Building a positive identity should begin at a young age, and to develop a healthy view of oneself, a good inclusion framework must understand how discrimination and stigma affect young people's identities and how social interaction is built on this later on. While changing the majority's perception into a more positive and engaging one, we must ensure that Roma youth have a healthy view of themselves and that internalised stigmas do not stifle their development.

A programme such as *Bari Shej* within the new HNSIS focuses on Roma women, with the general idea that they need good examples and mentors in order to stay in school and continue their education. While this is not a bad approach, and Roma youth, particularly girls, need to see positive role models, HNSIS does not mention the development of a positive identity. While it mentions the Romani language and funds allocated for Roma

⁷⁵ EERC and Rosa Parcs Foundation, '[Joint Submission Concerning Hungary To the Human Rights Council, Third Universal Periodic Review Cycle, for Consideration at the 30th Session \(October–November 2021\)](#)', November 2021.

⁷⁶ Hungarian Government, 'Hungarian National Social Inclusion Strategy 2030', 45.

⁷⁷ Representative, Interview with a Representative from Subjective Values Foundation, April 2022.

⁷⁸ Phiren Amenca, 'I AM NOT YOUR GYPSY! Youth Speaking up against Antigypsyism' (Alliance against Antigypsyism, 2021), 6.

⁷⁹ Orsolya Keresztes-Takács, 'ROMA FIATALOK ETNIKAI IDENTITÁSA ÉS ÖNÉRTÉKELÉSE EGY KÉRDŐÍVES KUTATÁS TÜKRÉBEN', *Magyar Valóság*, 2017, 17.

self-government and earmarked media funds, it does not aim to eliminate antigypsyism from institutions and policy practices in general, or to indirectly and directly build positive Roma identities.⁸⁰

*"I think the strategy that concentrates on the identity of today's Roma young people is less responsive to how their own identity develops. In Hungary, the Roma issue is still defined as a social problem, not as an identity that you have to be self-aware of, and that you have to know a lot about yourself and your culture, so it is not there to help Roma young people build a positive image."*⁸¹

⁸⁰ Hungarian Government, 'Hungarian National Social Inclusion Strategy 2030', 152.

⁸¹ UCCU Representative, Interview with a Representative from the Roma Informal Education Organisation NGO (UCCU).

2. EXPECTED EFFECTIVENESS

2.1. Coherence with related domestic and European policies

The HNSIS makes many assertions in the introduction regarding how the all-encompassing new HNSIS fits into Hungary's historically developed strategy framework, including both national and local issues vertically, and is also a part of the sectoral plans that have emerged in recent years.⁸²

The National Roma Contact Point explicitly said that:

*"There are countries in the EU whose Roma integration strategies are very partial; in our country this is not the situation. This is a grounded social policy strategy which is present in several sectors that refer to the HNSIS in their strategies. Nor is it common for a state to have an independent State Secretariat in the Ministry of the Interior, an administrative segment that is in relatively good standing in terms of its position in public administration."*⁸³

The HNSIS includes a short table that gives a basic idea of how other strategies will be linked to it,⁸⁴ but the table does not mention any hierarchies or how the HNSIS will impact or be influenced by other strategies. Throughout the 200 pages it mentions the FETE programme several times and highlights its relevance. The reader may believe that the most significant benefits for Roma inclusion are primarily reliant on FETE's sophisticated programme delivery. The document reveals that there are numerous HNSIS programmes, and the government intends to establish them as services through a bidding process. Then, with secure and predictable funding, the successful programmes will be integrated into the domestic care system. However, it is unclear in what volume, and on what basis.⁸⁵ There is no dedicated section which thoroughly explains how all the domestic strategies will coordinate with the HNSIS. There are a couple of references in each chapter, but again, how tightly those fit with the strategy is not explained.

During interviews with government officials, it became clear that from their point of view the HNSIS is clear, structured, and well linked to other strategies.⁸⁶ Interviews and opinion pieces from civil society, on the other hand, make it clear that people who do not have a direct connection or employment with the ministries that draft and implement the HNSIS would not be able to properly review the procedures. From all the feedback we have gathered from civil society members we interviewed and from the above-mentioned opinion pieces, we conclude that the government has demonstrated very poor performance when it comes to inclusive policy planning.

2.2. Responsibility for NRSF coordination and monitoring

In August 2019, the Directorate-General for Social Opportunity was established as the background institution of HNSIS within the Ministry of Interior, which undertakes the training, organizational, territorial coordination, methodological and research tasks associated with the social inclusion strategy. Territorial directorates claim to liaise with municipalities, NGOs, churches, social, education and training institutions, government

⁸² Hungarian Government, 'Hungarian National Social Inclusion Strategy 2030', 8.

⁸³ Ulicska, Interview with the National Roma Contact Point on the Hungarian National Roma Integration Strategy 2020-2030.

⁸⁴ Hungarian Government, 'Hungarian National Social Inclusion Strategy 2030', 152.

⁸⁵ 11 Roma and Pro-Roma Organisations, 'Általános Vélemény a Magyar Nemzeti Felzárkóztatási Stratégia Tervezetéről'.

⁸⁶ Ulicska, Interview with the National Roma Contact Point on the Hungarian National Roma Integration Strategy 2020-2030.

agencies, employers' and workers' organizations, chambers, and coordinate activities related to social inclusion.⁸⁷ In all fairness, Roma integration issues do have a designated place in the government system.

Interviewing several stakeholders of the HNSIS was critical, because there are sharp disagreements or mixed feelings when it comes to the government's commitment to the HNSIS and Roma inclusion in general. Three different quotations are presented below that reflect the dynamic and various stakeholder perspectives.

The first quote reassures us, and reading it would imply that there are no issues with the strategy or institutional commitment, but the second and third opinions explain a bit more about the structural environment. As stated in the preceding paragraph, there is no doubt that the HNSIS has a designated authority, but we have no way of knowing how other authorities in charge of different areas are performing. We cannot speak of dedication if the HNSIS fails to name the concrete authorities in charge and continues to be vague in the subsequent Action Plan. While there might be a dedicated structure, we cannot talk about good intention while the government fuels segregation with its own policies, or while political leaders can openly practice hate speech and antigypsyism against the Roma community.

"This is the result of the last ten years, and we are proud of the established sectoral service system. Previously, children's houses, the Tanoda system, the Roma vocational college, and improvements and services made using EU funds didn't have such clarity and sectoral logic. Last, the HNSIS was not in such a position in bureaucracy and politics as it is now."⁸⁸

"On a government level, of course I see political will to treat the different intervention policy areas as areas of stress, especially those which are included in the strategy. However, I am not sure that the sectoral areas and authorities in charge of different social policies are linked, which is a non-neglectable part of effectively executing interventions. For example, the State Secretary of Social inclusion now belongs to the Ministry of Interior Affairs, while the different policy areas again belong to a different ministry. There is a clear horizontal deficiency within the structure of the administration as well – a deficiency in how institutions build on each other, not only as entities but in terms of powers and responsibilities. The strategy itself does not define which state authority is responsible for executing the different policy areas."⁸⁹

"When the leader of a country divides the Roma and the non-Roma population living in Hungary into indigenous and non-indigenous people, when he segregates and therefore disadvantages children as scapegoats, when no government actor speaks about this [...], we can rightly assume that there is no governmental decision-making force that believes in the true equality of the Hungarian Roma people."⁹⁰

2.3. Quality of the plan

While the HNSIS does well on analysing multiple problems in several areas, it is not written in a way that enables systematic thinking about the issues of Roma integration. The

⁸⁷ Hungarian Government, 'Hungarian National Social Inclusion Strategy 2030', 160.

⁸⁸ Ulicska, Interview with the National Roma Contact Point on the Hungarian National Roma Integration Strategy 2020-2030.

⁸⁹ Representative, Interview with a Representative from the Secretariate of the Deputy Commissioner for Fundamental Rights Ombudsman for the Rights of National Minorities.

⁹⁰ 11 Roma and Pro-Roma Organisations, 'Általános Vélemény a Magyar Nemzeti Felzárkóztatási Stratégia Tervezetéről'.

current strategy, while mentioning specific policy areas, approaches the issues point by point, and not in a way that increases understanding of the causality among issues. While it might try to give some directions for interventions, it is not able to treat them in a grouped, horizontal manner. Just like the previous HNSIS, the current iteration is abstract and does not try to dig down to the core of the issues. There are no horizontal ideas about how to handle big structures. This is very problematic since the new strategy covers the next 10 years, which is not a short timeframe.⁹¹

“What we are missing is precisely that the HNSIS is timid and does not want to unify individual areas. It does not want to reach for [have an effect on] large systems (public education, social field, health care, vocational training, etc.), it does not plan to expand basic social services, and it does not want to coordinate them.”⁹²

While the HNSIS contains a short table with eight long-term targets⁹³ it lacks a clear statement of principles and methods and clear indicators which would help in the creation of action plans, and which could serve as a base for the implementers to know what needs to be achieved until what time.⁹⁴ Identifying eight areas and their success indicators is too general. There are so many sub-problems in each policy area: taking for example one of the targets from the table: “*The rate of early school leaving among Roma students will drop*”, this does not tell us anything about the relationship to other pressing issues, such as segregated schools, quality of education, etc. Even if the target number is reached, we do not know whether the respective students stayed in segregated schools and what the quality of the knowledge is that they obtained from the institutions.

The current HNSIS evaluates its previous success based on the data collected by the Central Statistics Office (CSO). The CSO’s statistics will also be used for further examination and monitoring. There is no mention of civil society participation, particularly of Roma and pro-Roma organisations that may use their own research, surveys, or other monitoring methods to keep the checks and balances in place.

2.4. Funding

The HNSIS places strong emphasis on showcasing the history of programmes and support areas outlined in the previous strategy. It is reasonable to expect that the majority of interventions will be supported and funded through the continuation of these programmes. In none of the policy areas within the HNSIS and its First Action plan are concrete funding amounts mentioned. Previous investments are more likely to be discovered in the strategy. The first action plan approved by the government follows the same design and does not specify specific amounts or allocations of resources.⁹⁵

The lack of funding information in the Strategy will make it difficult for anyone to track whether action plans are being developed appropriately and whether the resources required to achieve specific improvements, particularly in the field of Roma inclusion, have been allocated.

⁹¹ Representative, Interview with a Representative from the Secretariate of the Deputy Commissioner for Fundamental Rights Ombudsman for the Rights of National Minorities.

⁹² 11 Roma and Pro-Roma Organisations, ‘Általános Vélemény a Magyar Nemzeti Felzárkóztatási Stratégia Tervezetéről’.

⁹³ Hungarian Government, ‘Hungarian National Social Inclusion Strategy 2030’, 36.

⁹⁴ Representative, Interview with a Representative from the Secretariate of the Deputy Commissioner for Fundamental Rights Ombudsman for the Rights of National Minorities.

⁹⁵ Romagov.hu, ‘[A Magyar Nemzeti Társadalmi Felzárkózási Stratégia 2030 Végrehajtásának a 2021-2024. Évekre Szóló Kormányzati Intézkedési Tervéről](#)’, 2021.

The beneficiary consortium is a strange formation in the world of domestic tender systems – winners (in this case, municipalities) who are unable to do anything without the necessary professional background are forced to work closely with other organizations, sharing resources and tasks. These organizations may be municipal public institutions, other state institutions, or civil and church-run organizations, and the proportion and manner in which tasks are divided between them are absolutely dependent on the local context.⁹⁶

“There is a kind of emigration within the civil sphere. The money is in the local government system, so in this sense if you are a civil leader but not on good terms with the local minority government, it is very difficult to get money for Roma affairs. It is known that local Roma leaders and municipal representatives who carry out civil activities have power – not in the wrong sense of the word, - and it is seen that the local civil sector merges with the municipalities. It is difficult to find independent NGOs.”⁹⁷

Aside from the aforementioned beneficiaries, one of the most frequently mentioned partners in HNSIS is the FETE programme. Resources will be channelled through FETE to partners, the majority of which are church-funded NGOs and charities.⁹⁸ It is impossible to understand what this means in terms of funding for Roma settlements, and how many areas will benefit from the specified 300 settlements.

Curiously, a one-page government decree was published as a matter of state record in the Magyar Közlöny, an official Hungarian periodical, on FETE’s website that defines the tasks related to the New Roma Strategy (2019–2030). It is indeed astonishingly short when compared to the strategy’s numerous references to FETE. According to the document, in addition to the 30 settlements, a development programme will be launched in Csörög, Monor, and Nagybárkány. It is impossible to determine whether these settlements were included because of their Roma population, or whether the other 30 settlements are related to the HNSIS and the Roma at all.⁹⁹

Furthermore, FETE’s website, which was developed in 2022, provides insight into the type of partnerships the programme will have, and as the main actor within the HNSIS it is important to note that only four of the 17 (mostly church-affiliated) organizations/churches can be associated with missions related to the Roma community. Unfortunately, no Roma or pro-Roma CSO with decades of field experience was mentioned as a main partner, so a large portion of HNSIS resources may be utterly devoid of experts of Roma origin or independent and active Roma and Pro-Roma organisations.

2.5. Monitoring and evaluation

The HNSIS and its action plan both place strong emphasis on the roles of various ministries and use the same evaluation circles. According to the action plan, the relevant ministers must submit a report to the Ministry of Interior every two years, and based on that, the Interior Minister will submit an overall report to the government within the same timeframe.¹⁰⁰

While relevant ministry officials are identified in the first action plan, the teams within the ministries that will contribute to the reporting are not. It is also unknown whether there

⁹⁶SzocOkos, ‘[Szegregációtól a Felzárkózásig – IV. Rész](#)’, 16 February 2022.

⁹⁷ Representative, Interview with a Representative from Subjective Values Foundation.

⁹⁸ SzocOkos, ‘[Szegregációtól a Felzárkózásig – IV. Rész](#)’.

⁹⁹ Magyar Közlöny, ‘[A Kormány 1426/2019. \(VII. 26.\) Korm. Határozata Az Új Roma Stratégiával \(2019–2030\) Összefüggő Feladatok Meghatározásáról](#)’, 2021.

¹⁰⁰ Romagov.hu, ‘[A Magyar Nemzeti Társadalmi Felzárkózási Stratégia 2030 Végrehajtásának a 2021-2024. Évekre Szóló Kormányzati Intézkedési Tervéről](#)’.

will be Roma expert participation and contributions from an independent civil organisation. As the HNSIS also lacks identification of Roma actors in this manner, it cannot serve as a basic consultative document for ministries when they establish programme monitoring and evaluation teams.

There is no mention of an additional budget for monitoring in any of the documents. It is critical to understand that neither the HNSIS nor the first action plan includes specific dates or deadlines for the interventions. From a monitoring standpoint, having a concrete timeframe for processes would have been critical. This may also allow one to determine whether the HNSIS and action plan are on the right track.

Regarding the lack of a timetable for action, the National contact point stated:

“For a lot of measures, the deadline is continuous, we could only note when to start them. It means we are continuing or improving programmes that are already in operation and a lot of measures are linked to our EU development plans, which were not yet ready at the time when the HNSIS was drawn up. In particular, the strategy was written when we still did not have detailed EU development plans for 2021-27. We have described the main directions of the interventions, but the exact schedule can only be recorded in the planning of the measures, in the operational programmes and the tenders.”¹⁰¹

The HNSIS in its monitoring sections mentions that “During programme monitoring, we can rely on aggregated programme evaluation from each programme [and] we attach great importance to conducting independent evaluations in each area”. Furthermore, it will use data collected by the CSO and will compare previous policy area improvements to the developing trend in later years.¹⁰²

This will represent an extremely difficult and complex system for gathering data on the effectiveness of the programme, and the HNSIS itself mentions that they need to consider compiling a narrower, more focused strategic target and indicator system.¹⁰³

2.6. Assessment of the expected effectiveness and sustainability

If a strategy is prepared without proper consultation and does not rely on field experience and expert opinions, it will have a hard time creating concrete, working, efficient implementable actions. The lack of clarity concerning systematic issues and tying them together in a comprehensive plan will eventually lead to problems with effectiveness. To simply put it, none of the discussed policy areas mentioned within the Relevance chapter of this report will be affected on a scale that can be branded as effective. Without systematic policy change, while some Roma will benefit from implemented projects, we cannot talk about upscaling whereby the Roma community as a whole will be elevated and experience a positive, long-lasting change in their socioeconomic status.¹⁰⁴

The lack of participation of Roma and Pro-Roma independent civil society does not only mean that the HNSIS does not utilise field knowledge, but also that civil society itself does not have a baseline which enables them to refer to when they are supporting Roma communities in Hungary. There should be clear lines of intervention and achievements in

¹⁰¹ Ulicska, Interview with the National Roma Contact Point for the Hungarian National Roma Integration Strategy 2020-2030.

¹⁰² Hungarian Government, ‘Hungarian National Social Inclusion Strategy 2030’, 172.

¹⁰³ Hungarian Government, 166.

¹⁰⁴ Representative, Interview with a Representative from the Secretariate of the Deputy Commissioner for Fundamental Rights Ombudsman for the Rights of National Minorities.

different policy areas so that civil stakeholders could tap into programmes, thereby enhancing the human resources on both sides.

Overall, based on the analysis of the HNSIS and its related documents, as well as the interviews conducted during this monitoring report period, we can conclude that the main issue is that the HNSIS's aims and goals are too broad, and the strategic document makes no mention of reforming major policy areas.

"It is like saying, let everything be 'good', which means this cannot be accounted for or quantified. If you do not have reliable starting numbers for each intervention, and you do not state where those numbers should improve, then you cannot reach your goals. This way [according to the former way], you can state that you have achieved everything you wanted, even if you did not."¹⁰⁵

Many of the stakeholders who were interviewed spoke about the importance of indicators, which we later on highlighted during our conversation with the NRCP. Upon request, we received a heat-map¹⁰⁶ about the development of poverty and social inclusion problems as described in the HNSIS. It aims to compare years in terms of percentages concerning whether an area has been improved.

While the heat map looks like it could be a useful tool for tracking overall improvements related to different policy issues, there is no explanation of how the data was collected, and there is certainly no indicator which signals the projected achievement that is needed, or the factors of causality between areas. The rest of the indicator results have to be put into context and it should be examined if real outcomes have been achieved. The current HNSIS references part of the heat map and states that the goals and indicators will not be much different from the previous ones.¹⁰⁷

Furthermore, while the reduction of discrimination and segregation appears in the goals-related table in the strategy, it does not appear in the previous system of indicators. Positive (affirmative) measures that fail to challenge the systematic nature of social exclusion and discrimination constitute the majority of mainstream measures aimed at promoting social inclusion. The lack of impact assessment and monitoring for mainstream measures implemented under the auspices of the HNSIS makes it impossible to track and measure their impact on the Roma population.¹⁰⁸

¹⁰⁵ Representative, Interview with a Representative from Subjective Values Foundation.

¹⁰⁶ National Roma Contact Point, 'Heat-Map', 2020.

¹⁰⁷ Hungarian Government, 'Hungarian National Social Inclusion Strategy 2030', 26.

¹⁰⁸ EERC and Rosa Parcs Foundation, 'Joint Submission Concerning Hungary To the Human Rights Council, Third Universal Periodic Review Cycle, for Consideration at the 30th Session (October–November 2021)', 9.

3. ALIGNMENT WITH THE EU ROMA STRATEGIC FRAMEWORK

3.1. Reflecting diversity among Roma

The new EU Roma Strategic Framework for Equality, Inclusion and Participation (EU-RSFEIP) indicates a dramatic shift in how European institutions regard Roma inclusion. The focus has broadened from social and economic integration to equality, inclusion, and participation. This means that the focus shifts from the Roma’s responsibility to integrate to Member States’ responsibility to remove impediments to Roma equality, effective inclusion, and meaningful involvement.¹⁰⁹ Most of the relevant areas of its monitoring and evaluation mechanisms would directly help stakeholders assess whether the needs of diverse communities have been targeted and improved, or are missing from the HNSIS. Although the following areas are identified in the HNSIS, there is little depth of analysis. HNSIS adopts programme-specific approaches but again does not specify the application of complex resolutions to issues such as the legislative, policy, institutional and social empowerment of diverse Roma communities. A strategy that promotes inclusivity and showcases diverse communities should be able to name the target groups as participants in design as well. Women, youth, and LGBTIQ+ voices should appear as main consultation partners, and in this case the ‘nothing about us without us’ principle that appears in the HNSIS would be more tangible:

<i>Specific Roma Group</i>	<i>Represented in the country and facing specific problems</i>	<i>Included in the HNSIS</i>	<i>Specific targets and measures aimed at the group included in the HNSIS</i>
Children	Yes	Yes	Yes, only in specifically identified areas: 1. Material and social poverty of families with children (non-Roma specific) 2. Increasing number of Sure-start children’s houses (non-Roma specific, only an increase of 700 children to be achieved by 2030)
Women	Yes	Yes	No
Roma youth	Yes	Yes	Yes, only in specific areas: 1. The rate of early school leaving among Roma students will decrease. 2. Number of 15–24-year-old Roma students

¹⁰⁹ European Commission, ‘[EU Roma Strategic Framework for Equality, Inclusion and Participation \(2020-2030\)](#)’, 2020.

			in tertiary education will increase. 3. Number of young people not in education or training among Roma will decrease.
Older Roma	Yes	Yes	Not specifically for old people: 1. The proportion of Roma aged 15-74 with a low level of education will decrease. 2. Employment among Roma aged 15-64 will increase.
Roma with disabilities	Yes	No	No
EU mobile citizens	No	No	No
Non-EU nationals	Yes	No	No (this might be because Ukrainian Roma citizens arrived after the HNSIS was completed).
Stateless Roma	No	No	No
Roma LGBTIQ+	Yes	No	No

All targets contained in the table above are associated with improvement-related targets the HNSIS sets out to achieve (in percentages). However, we do not know how this number changes when we dig deeper into these umbrella categories, since sub-categories are not associated with indicators in the HNSIS.

Although the HNSIS acknowledges the new direction of the EU-RSFEIP, it states the areas of concern in a very general way. For example, if we take out the part on violence against women, we have no idea based on the content whether Roma women are more prone to this.¹¹⁰ We have no idea generally how Roma women experience multiple/intersectional disadvantages not only within the Roma community but in a cross-sectoral way in the country. The HNSIS recognises Roma identity but does not treat it as an intersectional factor which goes hand in hand with discrimination, hence there are a lack of measurable initiatives associated with discrimination and Antigypsyism.

3.2. Combining mainstream and targeted approaches

As mentioned in previous chapters, both the previous and current HNSIS target the entire population, with the Roma community serving as a special case within the inclusion programme. The main goal is to reduce poverty and the disparity between Roma and non-Roma populations according to key indicators of poverty and social mobility.¹¹¹ This leaves us with not only the danger that Roma will benefit less from any possibly actionable part of the strategy, but that they might end up being excluded.

¹¹⁰ Representative, Interview with a Representative from Subjective Values Foundation.

¹¹¹ Hungarian Government, 'Hungarian National Social Inclusion Strategy 2030', 6.

While the strategy includes mainstreaming and targeted approaches, it appears that these measures are sometimes being used in the wrong places:

1. The HNSIS mainstreams/delegates larger policy areas to relevant ministries, but does not aim to transform broader policy frames – for example, it aims to reduce school dropout among Roma but does not aim to raise the minimum school-leaving age from 16 to 18; it aims to improve long-term access to inclusive and integrated education for Roma and children but lacks concrete indicators applicable to desegregating schools, settlements, and institutional practices.
2. HNSIS selects FETE as its main partner and mainstreaming programme for addressing complex issues (education, health, housing, and employment) among the most disadvantaged settlements. However, it includes no indicator of how many Roma will be reached within its programme frame. Therefore, targeted approaches are missing, and currently mainstreaming ones are present.

A well-funded programme like FETE must incorporate targeted approaches to ensure that results are transparent, and we cannot simply assume that it reaches Roma because they tend to live in the most deprived areas. Furthermore, because this programme is heavily reliant on fieldwork, Roma participation (unrelated to church organisations) should be a critical component of any implementation strategy and an indicator of success.

A large proportion of Roma live in segregation/segregated areas, which are those areas and districts that do not have proper (or any) access to basic public services, nor have social workers, nurses, or paediatricians present. These are shortcomings that cannot be addressed through training and the promotion of labour-market integration – they are regional development issues.¹¹² It will become even more evident that the HNSIS cannot reach its goals in a sustainable and long-lasting way if these general problems are not solved at a national level. As mentioned before, in order to ensure the success of the strategy, big policy areas and action plans have to reflect the development we want to see in ten years' time.

3.3. Usage of instruments introduced by the Council Recommendation

The overarching objective of the Council Recommendation is to help to promote equality and combat the exclusion of Roma, with their active involvement. It states that the national Roma strategic frameworks should be horizontally built on the principles of equality, inclusion, participation, and the effective prevention of discrimination and antigypsyism.¹¹³

Apart from the involvement (or lack thereof) of Roma experts and true implementation of the 'nothing about us without us' principle, which has been mentioned several times in this Civil Monitoring report, it is important to emphasise the situation of the societal acceptance of the Roma population, because the related judgements and perceptions will affect the implementation, applications, and success of the interventions currently present in the strategy. Furthermore, the ongoing rejection of Roma at all levels of society promotes disengagement and alienation from the majority population.

Social support is important in the field of inclusion because society is the medium in which programmes take place.

¹¹² SzocOkos, 'Szegregációtól a Felzárkózásig – IV. Rész'.

¹¹³ '[Council Recommendation of 12 March 2021 on Roma Equality, Inclusion and Participation 2021/C 93/01](#)', Pub. L. No. 2021/C 93/01) (2021).

What matters is whether this medium is accepting, supportive, or hostile. The HNSIS programmes are multi-level interventions; the interventions affect individuals, families, and local communities, ranging from the given target group to the entire (part) settlement, and indirectly from the perspective of the entire Hungarian society. As a result, it can be stated as a kind of core principle that the success of a complex intervention necessitates that the surrounding social environment is accepting, and interventions aimed at social inclusion cannot be interpreted without understanding their impact on the receiving social environment.¹¹⁴

All the horizontal recommendations except for those that refer to LGBTIQ+ communities are mentioned in the HNSIS, but unfortunately only on the level of statements. Concrete measurable interventions about participation, equality, and antigypsyism cannot be found in the document. There is no mention of how they will include more participatory frameworks other than those that already exist, nor how discrimination across policy areas will be tackled.

“It is quite clear that the HNSIS existed before the Council recommendations, and it was going through its final draft edition when the recommendations were published. A concrete system should have been developed concerning what such a strategy should consist of, and what should have been its elements. Hungary should have revisited all these programmes and screened them through the Council recommendations but that didn’t seem to happen.”¹¹⁵

Changes require significant will at the political level, which without addressing exclusion and related problems cannot be solved. It must be stated that the current government plays a decisive role in the survival of anti-minority narratives. Statements from politicians or the Prime Minister himself such as depicting Roma as “aggressors against the majority” (the Gyöngyöspata case) or comparing Roma to refugees¹¹⁶ creates an atmosphere of hostility, strengthening the feeling of ‘Us’ and ‘Them’. In this environment, projects should not be expected to be carried out effectively.

¹¹⁴ SzocOkos, ‘Szegregációtól a Felzárkózásig – IV. Rész’.

¹¹⁵ Representative, Interview with a Representative from Subjective Values Foundation.

¹¹⁶ [‘Hungary’s Minorities Bear Brunt of Anti-Migrant Rhetoric’](#), *Reuters*, 1 October 2015, sec. Europe News.

4. ADDITIONAL FINDINGS

As previously stated in Chapter 1, Hungary has been experiencing steady decline in terms of human rights protection and equal treatment. Understanding such an environment is essential when measuring the potential effects of HNSIS. While the EU-RSFEIP and the Council Recommendation provoke countries to implement exact, measurable policies for tackling discrimination and promoting Roma participation and recognising the diversity among Roma, behind the Hungarian HNSIS strategy the current political power plays and national interventions are leading to the deterioration of the above-mentioned important areas.

Declining Human Rights Authorities – hindering the development of anti-discriminatory measures

Until 31 December 2020 Hungary had two equality bodies: the 'Equal Treatment Authority' (ETA)¹¹⁷ and the 'Commissioner for Fundamental Rights (Ombudsman)'.¹¹⁸ In November 2020, the Hungarian Parliament proposed abolishing the ETA and transferring its tasks and competencies to the Ombudsman. The legislative proposal entered into force despite the fact that the Ombudsman had recently passed through a process of re-accreditation initiated by the UN Global Alliance of National Human Rights Institutions. The reason for the reaccreditation stated that the Ombudsman did not demonstrate adequate efforts in addressing all human rights issues, nor had it spoken out in a manner that promoted and protected all human rights.¹¹⁹ This major reform of the national human rights infrastructure was an issue of concern for the CoE's Human Rights Commissioner, casting doubt on the independence and the effectiveness of the incumbent organization and pointing to the lack of consultation with the Hungarian public.¹²⁰ Serious concerns¹²¹ lead to the conclusion that this reform has decreased the level of protection against discrimination of the most vulnerable groups, such as the Roma.

ECRI's fifth monitoring cycle report on Hungary informs readers that vulnerable communities such as Roma, Jews, LGBTQ+ people, migrants and refugees experience widespread derogatory rhetoric from public officials, which has legitimised and strengthened the level of intolerance expressed by the general population against these groups.¹²² In the case of Gyöngyöspata, key public figures incited hatred against Roma families and children, attempting to enhance the obvious discriminatory provision of substandard education in segregated classes for Roma children. There is widespread

¹¹⁷ An autonomous public administrative body designed to guarantee that the principle of equal treatment is upheld. ETA deals with discrimination based on age, disability, gender, racial or ethnic origin, religion or belief, sex, and sexual orientation, among other protected characteristics under the ETA. The Authority is entrusted with all the powers required by the Racial Equality Directive. <https://www.equalitylaw.eu/downloads/5345-hungary-legislation-adopted-abolishing-the-equal-treatment-authority-andtransferring-its-tasks-to-the-ombudsman-126-kb>

¹¹⁸ 'Office of The Commissioner For Fundamental Rights of Hungary', Névtelen webhely, accessed 9 May 2022.

¹¹⁹ Global Alliance of National Human Rights Institutions (GANHRI), 'Report and Recommendations of the Session of the Sub-Committee on Accreditation (SCA) 14-18 October 2019', October 2019, 23–26.

¹²⁰ 'Commissioner Urges Hungary's Parliament to Postpone the Vote on Draft Bills That, If Adopted, Will Have Far-Reaching Adverse Effects on Human Rights in the Country', Commissioner for Human Rights, accessed 9 May 2022.

¹²¹ More information can be found here: European Network of Legal Experts in Gender Equality and non-discrimination, 'Hungary, Title: Legislation Adopted Abolishing the Equal Treatment Authority and Transferring Its Tasks to the Ombudsman', 10 February 2021.

¹²² The European Commission Against Racism and Intolerance (ECRI), 'ECRI Report on Hungary (Fifth Monitoring Cycle)', 9 June 2015, 21.

distrust between Roma communities and police authorities, with the latter suspicious of Roma and liable to link them to various minor offences.¹²³

The provision of legal aid to Roma individuals is inefficient because legal aid defence lawyers appointed by the state fail to effectively represent the interest of their clients, do not provide information, and in most cases do not even contact individuals. Most Roma are not able to pay for a defence lawyer and remain disproportionately impacted by these issues. As an outcome, they have accumulated a huge distrust of the criminal system.¹²⁴ Despite confirmed cases of Roma women being discriminated against in cases of medical assistance in Borsod county, and concern about such practices happening on a national level in hospitals, the government has not provided any assistance to victims.

Attack on Hungarian Civil Society – underfunded and excluded civil actors

Orbán’s government remains the prime instigator of decade-long attacks on civil society organisations and human rights defenders. Since 2016, the government has been intentionally introducing legal, administrative, and financial obstacles to undermine the latter. In 2016 and 2017, organisations such as the Hungarian Civil Liberties Union, the Hungarian Helsinki Committee, and Transparency International Hungary were targeted with stigmatising governmental rhetoric that suggested they should be “rolled back” and “swept out”.¹²⁵ The Bill on foreign-funded NGOs in 2017 recorded them in a special registry of “foreign-funded organisations” to further discredit and obscure their work. In June 2020, the Court of Justice of the European Union (CJEU) ruled that the Bill was in breach of the EU law. Although in 2021 Hungary received a notice to comply with the ruling, human rights organisations in Hungary do not believe there will be an appropriate reaction from the government.¹²⁶ The situation does not look like it will improve in the future, and what is more, the government is ready to impose more restrictive changes. In April 2021, a consortium of 19 non-governmental organisations (NGOs) expressed concern about the new law, which requires the State Audit Office to report annually on the financial status of NGOs with budgets exceeding 20 million forints (55,000 euros) which “influence the public”, and empowers the former authority to audit them selectively.¹²⁷

Hindering the Rights of the LGBTIQ+ community; Roma LGBTIQ+ invisible in HNSIS

EU-RSFEIP pays attention to how ethnicity intersects with other dimensions of identity, and how these intersections contribute to the unique experiences of discrimination faced by Roma. It recognises the necessity that Member States adopt an intersectional approach and reflect the diversity of Roma identities. Such intersectional approaches relate to the experiences of the Roma LGBTIQ+ communities. The hostile political environment and implemented legislation do not allow LGBTIQ+, and especially people with multiple identities such as Roma LGBTIQ+ individuals, to exercise their identities, thus it is expected that HNSIS will not attempt to tackle any related issues connected with multiple identities, especially within this community. Legislation like banning the dissemination of LGBTIQ+-related content to young people under the age of 18 and other government

¹²³ *The Hungarian Civil Liberties Union and Civic Roma Women of Bódva-völgy, 'Joint Submission to the 3rd Cycle of the Universal Periodic Review by Civil Society Organizations Containing Follow-Up Information on the Previous Reports of the Working Group on the Universal Periodic Review of Hungary'.*

¹²⁴ The Hungarian Civil Liberties Union and Civic Roma Women of Bódva-völgy, 13.

¹²⁵ EERC and Rosa Parcs Foundation, 'Joint Submission Concerning Hungary To the Human Rights Council, Third Universal Periodic Review Cycle, for Consideration at the 30th Session (October–November 2021)', 21.

¹²⁶ EERC and Rosa Parcs Foundation, 21–22.

¹²⁷ Franziska Tschinderle, '[A “Dark Day” for LGBTI Rights in Hungary, Leading to Calls for Urgent EU Action - CIVICUS - Tracking Conditions for Citizen Action](#)', 8 April 2021.

rhetoric are the biggest indicators that this community will not be represented within the respective programmes.

There is currently an LGBT Working Group within the Human Rights Roundtable that was set up by the government which meets at least twice a year. The recommendations of civil society are hardly ever implemented there. There is no cooperation between LGBTIQ+ Roma organisations and the government because there are no LGBTIQ+ Roma-related policies, and because the political climate is extremely homophobic and transphobic.¹²⁸ It is extremely important to mention that there is not much progress on gender equality within Hungary, and we can say that instead of mainstreaming gender equality the government has actively replaced it with 'family mainstreaming'. As a result, the gender equality policy regime has transitioned from serving gender equality goals to serving demographic sustainability targets.¹²⁹

¹²⁸ Ara Art, '[The Roma LGBTIQ Minority and Its Status in Selected EU Countries \(CZ, SK AND HU\).](#)' (AraArt, 2021).

¹²⁹ Andrea Krizsan and Conny Roggeband, eds., [Gendering Democratic Backsliding in Central and Eastern Europe. A Comparative Agenda.](#) (Central European University, 2019), 83.

CONCLUSIONS AND RECOMMENDATIONS

While the HNSIS has finally identified antigypsyism as a major factor of the intersectional disadvantage Roma groups face in Hungary, there has been little progress in terms of countering systematic discrimination. Overall, the HNSIS has the potential to identify significant sectoral problems on a point-by-point basis, but it fails to address them horizontally and has no incentive to change wider policy structures. The HNSIS and the first Action Plan, in general, do not provide timeframes, financial transparency, or indicators for all key programmes and policy domains. While Roma women and youth are given more attention in the plan, the LGBTIQ+ community is completely excluded. Rather than involving Roma and pro-Roma civil society at all levels of the strategy, empowerment focuses on strengthening church organisations and pre-existing partnerships

Recommendations to the Hungarian government:

1. The HNSIS Roma strategy and its Action Plans should be developed through genuine professional dialogue and joint workshops and consultation involving Roma and Pro-Roma politically independent organisations, beyond the existing mechanisms.
2. Timeframes and action plans for consultations should be realistic and transparent, but most importantly, based on mutual dialogue and agreement between government authorities and other expert and civil society stakeholders.
3. Civil society organisations, especially Roma and Pro-Roma ones that are independent from churches, should have an equal chance to contribute to programme monitoring, implementation, and evaluation.
4. The HNSIS must recognise that the word `Roma` refers to a collective identity, thus many sub-groups are represented within it; accordingly, participation should reflect the diverse identities currently present in the Roma population.
5. The current point-by-point system in the strategy should be transformed into a more horizontal and systematic perspective so that all readers and stakeholders can clearly understand the cross-sectional problems and the causality between policy areas as well as the linked interventions.
6. The strategy should serve as more than an introductory document to social inclusion, therefore the language and issue framing should move away from generalisation and abstract statements about issues towards using more specific language which provides real context and problem identification, even according to governmental policy practices and legislation.
7. The HNSIS should showcase the clear will to reform bigger social systems and link them to each other so the interventions of the Action Plans will not be set up to automatically fail due to general social policy mechanisms and problems.
8. Challenges identified in policy areas should involve the clear and concrete identification of interventions, and have indicator systems attached to them. The relationship between identified challenges and interventions should be described in a way that readers and stakeholders will understand how the HNSIS will tackle, monitor, and improve the interventions applied through the Action Plans.
9. The desired improvements and target percentages or numbers should be identified in ALL relevant policy overall and sub-categories. This will enable civil society actors and government authorities to monitor whether the HNSIS is on track and achieving its desired outcomes over the next ten years.

10. Financial transparency involving expected and actual budget costs should be clearly present in both HNSIS and the related Action Plans.
11. Tender applications and procedures for the HNSIS programme areas should encourage competition. The distribution of successful tenders should reflect the diversity of actors in civil society.
12. Impact assessment of each continued HNSIS programme should be conducted and screened through the Council Recommendations and by civil society stakeholders. Any programmes identified as not promoting inclusion, participation, and equality should go through serious redesign, or intervention using that particular method should be discontinued.
13. The new HNSIS, at all policy levels, should implement clear action to tackle antigypsyism and have appropriate goals and tools for measuring its success. The measures and problem identification associated with antigypsyism should address the political rhetoric which intensifies negative perceptions about Roma in Hungarian society.
14. The HNSIS should serve as an independent strategy document which clearly states all the factors hindering social inclusion. This includes the current discriminatory rhetoric of the ruling party and general hate speech made by any political actors. Furthermore, it should report on any decisions made by the government that erode the human rights institutions, independent civil society, and general rule of law of the country.

REFERENCES

List of interviews

1. First representative of RGDTs Nonprofit Kft. – Zoom meeting
2. Second representative of RGDTs Nonprofit Kft. – Zoom meeting
3. Representative of Romaversitas Foundation – Zoom meeting
4. Representative of Subjective Values Foundation – Zoom meeting
5. Representative of UCCU Roma Informal Education Foundation – Zoom meeting
6. Representative of Diverse Youth Network
7. Representative of the Hungarian Central Statistics Office
8. Representative of the Hungarian Charity Service of the Order of Malta – in-person meeting
9. National Roma Contact Point – Zoom meeting
10. Representative of the National Social Integration Secretariat – Zoom meeting
11. Representative of the Minority Ombudsman – Zoom meeting

Key policy documents and reports

11 Roma and Pro-Roma Organisations. 'Általános Vélemény a Magyar Nemzeti Felzárkóztatási Stratégia Tervezetéről', 2021. <https://drive.google.com/file/d/1QFiRHFaFzmfgoX94tqNLXSF28z20Ohdh/view?fbclid=IwAR1xsvJqUA0V0wRBHPoajt-DxN3PZWwS8YSIrPBKsMETqwtAZLmhpKWJtTY>.

Albert, Fruzsina. 'ESPN Thematic Report on In-Work Poverty Hungary'. Edited by European Commission. European Social Policy Network ESPN, 2019.

Ara Art. 'The Roma LGBTIQ Minority and Its Status in Selected EU Countries (CZ, SK AND HU).' AraArt, 2021. <https://www.araart.cz/getmedia/aa98f044-06a5-45c5-bf79-3a82c2a32776/ARA-ART-analyticka-zprava-A4-V1-korektura.pdf>.

Bureau of Democracy, Human Rights, and Labor. '2019 Country Reports on Human Rights Practices: Hungary'. Accessed 25 April 2022. <https://www.state.gov/reports/2019-country-reports-on-human-rights-practices/hungary/>.

Civilizáció. 'Civilizáció: coalition-building to fight back against government attacks on civil society'. Accessed 31 May 2022. <https://civilizacio.net/en/news-blog/civilizaci-coalition-building-to-fight-back-against-government-attacks-on-civil-society>.

Commissioner for Human Rights. 'Commissioner Urges Hungary's Parliament to Postpone the Vote on Draft Bills That, If Adopted, Will Have Far-Reaching Adverse Effects on Human Rights in the Country'. Accessed 9 May 2022. https://www.coe.int/en/web/commissioner/view/-/asset_publisher/ugj3i6qSEkhZ/content/commissioner-urges-hungary-s-parliament-to-postpone-the-vote-on-draft-bills-that-if-adopted-will-have-far-reaching-adverse-effects-on-human-rights-in-.

Council Recommendation of 12 March 2021 on Roma Equality, Inclusion and Participation 2021/C 93/01, Pub. L. No. 2021/C 93/01) (2021). https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:JOC_2021_093_R_0001.

European Roma Rights Centre. 'Director of segregated Gyöngyöspata school must not get away with assaulting a 12-year-old Romani boy'. Text. European Roma Rights Centre, May 2020. Hungary. <http://www.errc.org/news/director-of-segregated-gyongyospata-school-must-not-get-away-with-assaulting-a-12-year-old-romani-boy>.

Dragomir, Cristina-Ioana, Andrew Ryder, Marius Taba, and Nidhi Trehan. 'Romani Communities and Transformative Change; A New Social Europe'. Human Rights Review 23, no. 1 (March 2022): 159–61. <https://doi.org/10.1007/s12142-022-00658-0>.

EERC, and Rosa Parcs Foundation. 'Joint Submission Concerning Hungary To the Human Rights Council, Third Universal Periodic Review Cycle, for Consideration at the 30th Session (October–November 2021)', November 2021. http://www.errc.org/uploads/upload_en/file/5296_file1_hungary-upr-march-2021.pdf.

'Egalipe'. Accessed 29 May 2022. <https://www.egalipe.hu/>.

ELTE. 'Előítéletek kontra empátia'. ppk.elte.hu. Accessed 24 April 2022. <https://www.ppk.elte.hu/eloteletek-kontra-empatia>.

European Commission. A Union of Equality: EU Roma Strategic Framework for Equality, Inclusion and Participation for 2020-2030 (2020). <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52020DC0620&qid=1615293880380>.

———. 'EU Roma Strategic Framework for Equality, Inclusion and Participation (2020-2030)', 2020. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52020DC0620&qid=1615293880380>.

European Network of Legal Experts in Gender Equality and non-discrimination. 'Hungary, Title: Legislation Adopted Abolishing the Equal Treatment Authority and Transferring Its Tasks to the Ombudsman', 10 February 2021. <https://www.equalitylaw.eu/downloads/5345-hungary-legislation-adopted-abolishing-the-equal-treatment-authority-andtransferring-its-tasks-to-the-ombudsman-126-kb>.

European Parliament. 'The Impact of the Coronavirus Crisis on Roma and Travellers', 2021. [https://www.europarl.europa.eu/RegData/etudes/ATAG/2021/690524/EPRS_ATA\(2021\)690524_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/ATAG/2021/690524/EPRS_ATA(2021)690524_EN.pdf).

Global Alliance of National Human Rights Institutions (GANHRI). 'Report and Recommendations of the Session of the Sub-Committee on Accreditation (SCA) 14-18 October 2019', October 2019. <https://ganhri.org/wp-content/uploads/2021/03/SCA-Report-October-2019-English.pdf>.

Government of Hungary Szerző: 'A Kormány 1619/2021. (IX. 3.) Korm. határozata a Magyar Nemzeti Társadalmi Felzárkózási Stratégia 2030 végrehajtásának a 2021–2024. évekre szóló kormányzati intézkedési tervéről'. eGov Hírlevél (blog), 5 September 2021. <https://hirlevel.egov.hu/2021/09/05/a-kormany-1619-2021-ix-3-korm-hatarozata-a-magyar-nemzeti-tarsadalmi-felzarkozasi-strategia-2030-vegrehajtasanak-a-2021-2024-evekre-szolo-kormanyzati-intezkedesi-terverol/>.

Hojsik, Marek, Georgeta Munteanu, and Violetta Zentai. From The Shadow to the Limelight - The Value of Civil Society Policy Monitoring Knowledge in Roma Equality Struggles. Center for Policy Studies and the Democracy Institute, 2022. <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/publication/3326/cps-book-shadow-limelight-2022.pdf>.

Hungarian Central Statistics Office. 'Súlyos Anyagi Deprivációban Élők Aránya Nem, Korcsoport, Iskolai Végzettség, Gazdasági Aktivitás, Háztartástípus Szerint.', 2021. https://www.ksh.hu/stadat_files/ele/hu/ele0005.html.

- Hungarian Government. 'Hungarian National Social Inclusion Strategy 2030'. Ministry of Interior of Hungary, 2021. <https://ec.europa.eu/info/sites/default/files/mntfs2030.pdf>.
- Freedom House. 'Hungary: Nations in Transit 2022 Country Report'. Accessed 8 May 2022. <https://freedomhouse.org/country/hungary/nations-transit/2022>.
- Reuters. 'Hungary's Minorities Bear Brunt of Anti-Migrant Rhetoric', 1 October 2015, sec. Europe News. <https://www.reuters.com/article/us-europe-migrants-hungary-roma-idUSKCN0RV43E20151001>.
- Hungler, Sára, and Ágnes Kende. 'Diverting Welfare Paths: Ethnicisation of Unemployment and Public Work in Hungary'. E-Cadernos CES, no. 35 (15 June 2021). <https://doi.org/10.4000/eces.6299>.
- Idetartozunk Egyesület, and Minority Rights Group Europe. 'UPR of Hungary - 39th Session', 2021. https://minorityrights.org/wp-content/uploads/2021/10/UPR39_Hungary_MRG-Idetartozunk_Roma_2021.pdf.
- Jovanović, Djordje, Robert Kushen, and Ostalinda Maya Ovalle, eds. Life Sentence: Romani Children in Institutional Care. Budapest: ERRC, 2011.
- Kallai, Peter. 'ECMI Minorities Blog. How to Lose (the Almost) Guaranteed Representation – Recent Developments Concerning Roma Parliamentary Representation in Hungary', 11 March 2022. <https://www.ecmi.de/infocchannel/detail/ecmi-minorities-blog-how-to-lose-the-almost-guaranteed-representation-recent-developments-concerning-roma-parliamentary-representation-in-hungary>.
- Kertesi, Gábor, and Gábor Kézdi. A Roma Fiatalok Esélyei És Az Iskolarendszer Egyenlőtlenség. Vol. BWP 20. Budapest: MTA Közgazdaság- és Regionális Tudományi Kutatóközpont Közgazdaság-tudományi Intézet, 2016. <http://www.econ.core.hu/file/download/bwp/bwp1603.pdf>.
- Kovács, Katalin. 'Advancing Marginalisation of Roma and Forms of Segregation in East Central Europe'. Local Economy 30, no. 7 (1 November 2015): 783–99. <https://doi.org/10.1177/0269094215601812>.
- Krizsan, Andrea, and Conny Roggeband, eds. Gendering Democratic Backsliding in Central and Eastern Europe. A Comparative Agenda. Central European University, 2019. <https://cps.ceu.edu/publications/books/gendering-democratic-backsliding-central-and-eastern-europe-comparative-agenda>.
- Magyar Közlöny. 'A Kormány 1426/2019. (VII. 26.) Korm. Határozata Az Új Roma Stratégiával (2019–2030) Összefüggő Feladatok Meghatározásáról', 2021. <https://fete.hu/wp-content/uploads/2021/03/14262019.-VII.-26.-Korm.-hatarozat.pdf>.
- Ministry of Interior, Hungary. 'Emerging Settlements/ FETE - Felzárkózó Települések', 2019. https://fete.hu/wp-content/uploads/2022/04/felzarkozo-telepulesek_angol_BM.pdf.
- Molnár, László, and Bálint Bukovszky. '2010 Óta Nem Csökkentek a Jövedelmi Különbségek Magyarországon'. GKI GAZDASÁGKUTATÓ ZRT. Accessed 8 May 2022. <https://www.gki.hu/wp-content/uploads/2021/02/A-magyar-lakossag-jovedelem-elozslasa.pdf>.
- Magyar Helsinki Bizottság. 'Nagyon rossz lépés az Egyenlő Bánásmód Hatóság beolvasztása az Alapvető Jogok Biztosának Hivatalába', 25 November 2020. <https://helsinki.hu/nagyon-rossz-lepes-az-egyenlo-banasmod-hatosag-beolvasztasa-az-alapveto-jogok-biztosanak-hivatalaba/>.
- National Roma Contact Point. 'Heat-Map', 2020.
- . 'HNSIS 2020-2030 - Consultation Excel', 2022.

Neményi, Mária, Bence Ságvári, and Katalin Tardso. 'A Diszkrimináció Személyes És Társadalmi Észlelése És Az Egyenlő Bánásmóddal Kapcsolatos Jogtudatosság'. Hungarian Equality Treatment Authority, 2019.

http://real.mtak.hu/104962/1/EBH_2019_FINAL_20191208_HU_vegles.pdf.

Civilizáció. 'Nyílt Levél a Társadalmi Egyeztetésről Dr. Ágostházy Szabolcs Európai Unió Fejlesztésekért Felelős Államtitkár Részére'. Accessed 8 May 2022.

<https://civilizacio.net/hu/hirek-jegyzetek/nylt-levl-a-trsadmli-dr-gosthzy-szabolcseurpai-unis-fejlesztsekr-felels-llamtitkr-rszre>.

Névtelen webhely. 'Office of The Commissioner For Fundamental Rights of Hungary'. Accessed 9 May 2022. <https://www.ajbh.hu/web/ajbh-en/about-the-office>.

Orsolya Keresztes-Takács. 'ROMA FIATALOK ETNIKAI IDENTITÁSA ÉS ÖNÉRTÉKELÉSE EGY KÉRDŐÍVES KUTATÁS TÜKRÉBEN'. Magyar Valóság, 2017, 17.

Pénzes, János, Patrik Tátrai, and István Zoltán Pásztor. 'A Roma Népeesség Területi Megoszlásának Változása Magyarországon Az Elmúlt Évtizedekben'. University of Debrecen, 2018. <https://www.ksh.hu/docs/hun/xftp/terstat/2018/01/ts580101.pdf>.

Phiren Amencia. 'I AM NOT YOUR GYPSY! Youth Speaking up against Antigypsyism'. Alliance against Antigypsyism, 2021.

Radical, Norwich. 'Blighted Lives: Romani Children In State Care'. The Norwich Radical (blog), 5 March 2021. <https://thenorwichradical.com/2021/03/05/blighted-lives-romani-children-state-care/>.

Representative. Interview with a Representative from Subjective Values Foundation, April 2022.

———. 'Interview with a Representative from the Romaversitas Foundation', 1 May 2022.

———. Interview with a Representative from the Secretariate of the Deputy Commissioner for Fundamental Rights Ombudsman for the Rights of National Minorities, 5 April 2022.

Róbert, Báthory. 'Civilek: A Kormány Romastratégiája Csak Alibi Az Unió Pénzcsapokhoz'. Szabad Európa. Accessed 8 May 2022.

<https://www.szabadeuropa.hu/a/a-valodi-civilek-szerint-csak-alibi-a-kormany-romastrategiaja-az-unios-penzcsapokhoz/31198837.html>.

Roma Education Fund. 'Changes in Hungary's Public Education Act Hurt Disadvantaged Roma Children and Youth'. Roma Education Fund (blog), 9 September 2016.

<https://www.romaeducationfund.org/changes-in-hungarys-public-education-act-hurt-disadvantaged-roma-children-and-youth/>.

'romagov'. Accessed 9 May 2022. <https://romagov.hu/>.

Romagov.hu. 'A Magyar Nemzeti Társadalmi Felzárkózási Stratégia 2030 Végrehajtásának a 2021-2024. Évekre Szóló Kormányzati Intézkedési Tervéről', 2021.

https://romagov.hu/wp-content/uploads/2021/11/1619_2021-IX3_Korm-hat_Int-terv-21-24.pdf.

Romaversitas. 'Hungary - Submission by the Romaversitas Foundation for the UN Universal Periodic Review', 23 March 2021.

Spitálszky, Andrea. 'Roma in the Republic of Serbia and Hungary: The Challenges of Discrimination – A Comparative Report'. Minority Rights Group Europe (MRGE), March 2021. https://minorityrights.org/wp-content/uploads/2021/03/MRG_Brief_RomaComp_EN_Mar21_E.pdf.

SzocOkos. 'Egyházi Térnyeres a Szociális Agazatban', 11 November 2011. <https://tamogatoweb.hu/egyhazi-ternyeres-a-szocialis-agazatban/>.

———. 'Szegregációtól a Felzárkózásig – IV. Rész', 16 February 2022. <https://tamogatoweb.hu/szegregaciotol-a-felzarkozasiq-iv-resz/>.

———. 'Szubjektív: Halászati És Szociális Kérdésekről...'. SzocOkos, 8 March 2021. <https://tamogatoweb.hu/szubjektiv-halaszati-es-szocialis-kerdesekrol/>.

The European Commission Against Racism and Intolerance (ECRI). 'ECRI Report on Hungary (Fifth Monitoring Cycle)', 9 June 2015. <https://rm.coe.int/fifth-report-on-hungary/16808b57e8>.

The Hungarian Civil Liberties Union, and Civic Roma Women of Bódva-völgy. 'Joint Submission to the 3rd Cycle of the Universal Periodic Review by Civil Society Organizations Containing Follow-Up Information on the Previous Reports of the Working Group on the Universal Periodic Review of Hungary'. Tasz.hu, 8 March 2021. https://tasz.hu/a/img/Roma_UPR_2021.pdf.

Euronews. 'The Silence over Orban's Anti-Roma Rhetoric Shames the EU | View', 17 June 2020. <https://www.euronews.com/2020/06/17/european-leaders-silence-over-orban-s-anti-roma-rhetoric-shames-the-eu-view>.

Tschinderle, Franziska. 'A "Dark Day" for LGBTI Rights in Hungary, Leading to Calls for Urgent EU Action - CIVICUS - Tracking Conditions for Citizen Action', 8 April 2021. <https://monitor.civicus.org/updates/2021/07/06/dark-day-lgbti-rights-hungary-leading-calls-urgent-eu-action/>.

UCCU Representative. Interview with a Representative from the Roma Informal Education Organisation NGO (UCCU), 5 April 2022.

Ulicska, Laszlo. Interview with the National Roma Contact Point on the Hungarian National Roma Integration Strategy 2020-2030, 27 April 2022.

ANNEX: LIST OF PROBLEMS AND CONDITIONS

2.1. Fighting antigypsyism and discrimination

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

2.2. Education

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Lack of available and accessible pre-school education and ECEC services for Roma	Significant problems	Understood with limitations,	Adequate but with room for improvement,	Some targets but not relevant,
Lower quality of pre-school education and ECEC services for Roma	Critical problems	Mentioned but not analysed sufficiently	Present but insufficient	Absent
High drop-out rate before completion of primary education	Critical problems	Understood with limitations	Present but insufficient	Relevant targets were defined
Early leaving from secondary education	Critical problems	Understood with limitations	Present but insufficient	Relevant targets were defined
Secondary education/vocational training disconnected from labour market needs	Significant problems	Mentioned but not analysed sufficiently	Absent	Some targets but not relevant
Misplacement of Roma pupils into special education	Significant problems	Irrelevant	Absent	Absent
Education segregation of Roma pupils	Critical problems	Mentioned but not analysed sufficiently	Present but insufficient	Absent
Increased selectivity of the educational system resulting in concentration of Roma or other disadvantaged pupils in educational facilities of lower quality	Critical problems	Mentioned but not analysed sufficiently	Present but insufficient	Absent
Limited access to second-chance education, adult education, and lifelong learning	Critical problems	Mentioned but not analysed sufficiently	Present but insufficient	Some targets
Limited access to and support for online and distance learning if	Critical problems	Understood with limitations	Present but insufficient	Absent

education and training institutions close, as occurred during the coronavirus pandemic				
Low level of digital skills and competences and limited opportunities for their development among pupils	Critical problems	Understood with limitations	Present but insufficient	Absent
Low level of digital skills and competences and limited opportunities for their development among adults	Critical problems	Understood with limitations	Present but insufficient	Absent

2.3. Employment

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Poor access to or low effectiveness of public employment services	Critical problems	Sufficiently, understood with limitations	Adequate but with room for improvement	Some targets but not relevant
Youth not in employment, education or training (NEET)	Critical problems	Understood with limitations	Adequate but with room for improvement	Relevant targets were identified
Poor access to (re-) training, lifelong learning and skills development	Critical problems	Understood with limitations	Adequate but with room for improvements	Relevant targets were identified
Discrimination on the labour market by employers	Critical problems	Mentioned but not analysed	Present but insufficient	Absent
Risk for Roma women and girls from disadvantaged areas of being subjected to trafficking and forced prostitution	Significant problems	Mentioned but not analysed	Present but insufficient	Some targets (employment & education)
Primary labour market opportunities substituted by public work	Critical problems	Understood with limitations	Adequate but room for improvement	Some targets but not relevant (not specific)

Barriers and disincentives to employment (such as indebtedness, low income from work compared to social income)	Critical problems	Understood with limitations	Present but insufficient	Absent
Lack of activation measures, employment support	Critical problems	Understood with limitations	Present but insufficient	Absent

2.4. Healthcare

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Exclusion from public health insurance coverage (including those who are stateless, third country nationals, or EU-mobile)	Critical problems	Mentioned but not analysed	Present but insufficient	Absent
Poor supply/availability of healthcare services (including lack of means to cover out-of-pocket health costs)	Critical problems	Understood with limitations	Adequate but with room for improvement	Some targets but not relevant
Limited access to emergency care	Critical problems	Mentioned but not analysed	Present but insufficient	Absent
Limited access to primary care	Critical problems	Understood with limitations	Adequate but with room for improvement	Absent
Limited access to prenatal and postnatal care	Critical problems	Understood with limitations	Adequate but with room for improvement	Absent
Limited access to health-related information	Critical problems	Mentioned but not analysed	Present but insufficient	Absent
Poor access to preventive care (vaccination, check-ups, screenings, awareness-raising about healthy lifestyles)	Critical problems	Understood with limitations	Present but insufficient	Absent

Poor access to sexual/reproductive healthcare and family planning services	Critical problems	Understood with limitations	Present but insufficient	Absent
Specific barriers to better healthcare of vulnerable groups such as elderly Roma people, Roma with disabilities, LGBTI and others	Critical problems	Irrelevant	Absent	Absent
Discrimination/ antigypsyism in healthcare (e.g., segregated services, forced sterilisation)	Critical problems	Irrelevant	Absent	Absent
Unrecognised historical injustices, such as forced sterilisation	Critical problem	Irrelevant	Absent	Absent
Inequalities in measures for combating and preventing potential outbreaks of diseases in marginalised or remote localities	Critical problem	Mentioned but not analysed	Absent	Absent

2.5. Housing, essential services, and environmental justice

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Poor physical security of housing (ruined or slum housing)	Critical problems	Understood with limitations	Adequate but with room for improvement	Absent
Lack of access to drinking water	Critical problems	Mentioned but not analysed sufficiently	Adequate but with room for improvement	Absent
Lack of access to sanitation	Critical problems	Mentioned but not analysed sufficiently	Adequate but with room for improvement	Absent
Lack of access to electricity	Critical problems	Mentioned but not analysed sufficiently	Adequate but with room for improvement	Absent
Limited or absent	Critical problem	Mentioned but not analysed	Adequate but with room for	Absent

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

Limited or lacking access to green spaces	Minor problems	Absent	Absent	Absent
Roma excluded from environmental democracy	Critical problems	Absent	Absent	Absent
Tenancy denial based on ethnic identity.	Critical problems	Absent	Absent	Absent

2.6. Social protection

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
High at-risk-of-poverty rate and material and social deprivation	Critical problems	Understood with limitations	Adequate but with room for improvement	Adequate but with room for improvement
Income support programmes fail to guarantee an acceptable level of minimum income for every household	Critical problems	Understood with limitations	Adequate but with room for improvement	Absent
Limited access to income support schemes (low awareness, barrier of administrative burdens, stigma attached)	Critical problems	Understood with limitations	Present but insufficient	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)	Critical problems	Mentioned but not analysed properly	Present but insufficient	Absent
Low flexibility of income support programmes for addressing changing conditions of the household	Critical problems	Absent	Absent	Absent
Discrimination by agencies managing income-support programmes	Significant problems	Absent	Absent	Absent

Risk of municipalities misusing income support to buy votes	Critical problems	Absent	Absent	Absent
---	-------------------	--------	--------	--------

2.7. Social services

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Limited quality, capacity and comprehensiveness of help provided by social services	Critical problems	Understood with limitation	Adequate but with room for improvement	Some targets but not relevant
Limited access to social services: low awareness of them, low accessibility, (e.g., due to travel costs) or limited availability	Critical problems	Mentioned but not analysed	Present but insufficient	Absent
Services providers do not actively reach out to those in need	Critical problems	Mentioned but not analysed	Present but insufficient	Absent
Limited ability of social services to effectively work together with other agencies (e.g., public employment service) to help clients	Critical problems	Understood with limitations	Adequate but with room for improvement	Absent
Discrimination by social service providers	Critical problems	Mentioned but not analysed sufficiently	Absent	Absent
Lack of adequacy of programmes for addressing indebtedness (providing counselling and financial support)	Critical problems	Mentioned but not analysed	Absent	Absent

2.8. Child protection

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Child protection not considered in the NRSF	Critical problems	Understood with limitations	Adequate but with room for improvement	Some targets

Specific vulnerability of Romani children as victims of violence not considered	Critical problems	Understood with limitations	Present but insufficient	Absent
Segregated or discriminatory child-protection services provided to Roma	Critical problems	Mentioned but not analysed sufficiently	Present but insufficient	Absent
Activities aimed at strengthening parental responsibility and skills not available or not reaching out to Roma parents	Critical problems	Understood with limitations	Adequate but with room for improvement	Some targets but not relevant
Illegal practices of child labour	Minor problems	Irrelevant	Absent	Absent
Large-scale and discriminatory placement of Romani children in early childhood care institutions	Critical problems	Understood with limitations	Absent	Absent
Persistence of large-scale institutions rather than family-type arrangements	Significant problems	Understood with limitations	Adequate but with room for improvement	Absent
Early marriages	Significant problems	Understood with limitations	Present but insufficient	Absent
Barriers to children's registration; statelessness	Irrelevant	Irrelevant	Absent	Absent
Biased treatment of Roma youth by security and law enforcement	Critical problems	Irrelevant	Absent	Absent

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

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Poor or lacking awareness of the general population of the contribution of Roma art and culture to national and	Critical problems	Mentioned but not analysed sufficiently	Absent	Absent

European heritage				
Exclusion of Roma communities from national cultural narratives	Critical problems	Mentioned but not analysed sufficiently	Present but insufficient	Absent
Romani history and culture not included in school curricula and textbooks for both Roma and non-Roma students	Critical problems	Mentioned but not analysed sufficiently	Present but insufficient	Absent
Lack of inclusion of Romani language in schools, and development of necessary educational materials and resources for Romani language preservation and teaching	Critical problems	Understood with limitations	Adequate but with room for improvements	Absent
Lack of memorialization of Roma history through establishing monuments, commemorative activities, and institutionalizing dates relevant to Roma history	Critical problems	Understood with limitations	Adequate but with room for improvements	Absent

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);
from the delegations in non-EU countries
(http://eeas.europa.eu/delegations/index_en.htm);
by contacting the Europe Direct service (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>).



Publications Office
of the European Union