




A synthesis of civil society's reports
on the quality of the national strategic
frameworks for Roma equality, inclusion,
and participation

in the European Union

Prepared by:

 Democracy Institute

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*



A synthesis of civil society's reports on the quality of the national strategic frameworks for Roma equality, inclusion, and participation in the European Union

Manuscript completed in June 2022

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PDF	ISBN 978-92-68-03165-0	doi: 10.2838/155435	Catalogue number DS-04-23-445-EN-N
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How to cite this report:

Roma Civil Monitor (2023) *A synthesis of civil society's reports on the quality of the national strategic frameworks for Roma equality, inclusion, and participation in the European Union*. Publications Office of the European Union, Luxembourg.

Luxembourg: Publications Office of the European Union, 2023

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The report was prepared by Marek Hojsik (Democracy Institute of the Central European University, Budapest and Faculty of Science of the Charles University, Prague).

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

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CONTENTS

LIST OF ABBREVIATIONS	5
INTRODUCTION	6
1. PARTICIPATION	7
2. CONTENT OF THE NEW NRSFS	9
2.1. Approaches to Roma inclusion	9
2.2. Relevance and omissions	11
3. QUALITY OF NRSFS AS POLICY STRATEGIES	13
4. CONCLUSIONS AND RECOMMENDATIONS	14

LIST OF ABBREVIATIONS

CEE	Central and Eastern Europe
CSO	civil society organisation
DG Just	European Commission's Directorate-General Justice and Consumers
DI/CEU	Democracy Institute of Central European University
ERGO	European Roma Grassroots Organisations Network
ERRC	European Roma Rights Centre
ESF+	European Social Fund Plus
ESIF	European Structural and Investment Funds
EUFW	EU Framework for National Roma Integration Strategies (2011)
EURSF	European Roma Strategic Framework (2020)
FRA	European Union's Agency for Fundamental Rights
FSG	<i>Fundación Secretariado Gitano</i>
M&E	monitoring and evaluation
NRCP	National Roma Contact Point
NRIS	National Roma Integration Strategy (pre-2020)
NSRF	National Roma Strategic Framework (post-2020)
RCM	Roma Civil Monitor

Country abbreviations:

AT	Austria
BE	Belgium
BG	Bulgaria
CY	Cyprus
CZ	Czech Republic
DE	Germany
DK	Denmark
EE	Estonia
EL	Greece
ES	Spain
FI	Finland
FR	France
HR	Croatia
HU	Hungary
IE	Ireland
IT	Italy
LT	Lithuania
LU	Luxembourg
LV	Latvia
MT	Malta
NL	Netherlands
PL	Poland
PT	Portugal
RO	Romania
SE	Sweden
SI	Slovenia
SK	Slovakia

INTRODUCTION

This synthesis document is based on the monitoring reports about the quality of EU Member States' new post-2020 National Roma Strategic Frameworks (NRSF)¹ developed by civil society organisations (CSO) participating in the Roma Civil Monitor 2021-2025 (RCM) initiative.

The following countries could not be entirely considered in this report:

- Malta: not participating in the RCM initiative,
- Belgium, Finland, Ireland, and Portugal: the new post-2020 NRSFs have not been developed yet and are expected later in 2022 or 2023,
- Sweden: there is an ongoing long-term Roma strategy for 2012-2032; therefore, no new post-2020 NRSF is planned,
- Croatia, Cyprus, Germany, Lithuania, the Netherlands, and Slovenia: full drafts of the RCM reports were not available at the time of drafting of this document, therefore, this paper includes information from partial drafts of the country reports and from the survey organised among the CSOs participating in RCM.
- Estonia, and Luxembourg: these countries have not made available any NRSF-like document.

Information from the country reports was complemented with an online survey among CSOs and individual experts participating in the RCM 2021-2025 initiative. They were also provided with the draft of this report for verification of the information concerning their countries. Author of this report would like to thank those, who commented on the draft and provided their comments.

The full title of the RCM 2021-2025 initiative is "*Preparatory Action – Roma Civil Monitoring – Strengthening capacity and involvement of Roma and pro-Roma civil society in policy monitoring and review*". It is implemented by a consortium of 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) with participation of more than 120 civil society actors.

¹ NRSFs can take the form of a dedicated strategy or a set of mainstream policy measures relevant to Roma equality, inclusion and participation.

1. PARTICIPATION

The 2020-2030 European Roma Strategic Framework (EURSF) and the 2021 Council Recommendation for Roma Equality, Inclusion and Participation emphasise the importance of Roma participation and invite the Member States to strengthen the involvement of Roma and pro-Roma civil society in consultations, design and development of the new NRSFs and Roma-related policies, their implementation, monitoring and evaluation (M&E). The civil society actors participating in the RCM have reported a generally positive trend in the participation in the development of NRSFs compared to the previous National Roma Integration Strategies (NRIS; in the period 2011-2020):

cluster of countries ²	significant improvement	some improvement	no change	worsening
C1: the largest Roma populations and the most acute challenges	CZ SK	EL	ES HU RO	BG
C2: significant Roma populations	FR DE	IT		
C3: mid-sized Roma populations		AT NL		HR PL
C4: the smallest Roma populations		CY LT	SI	

In some Member States, Roma and pro-Roma civil society was deeply involved in **developing the new NRSF**. In SK, the strategy's content was created by working groups co-chaired by civil society experts and with quasi-equal participation of civil society and governmental representatives. In CZ, Roma civil society was even the driver of the strategy's entire rewriting after having criticised and rejected the first draft developed by the government office working alone. In other countries, Roma and pro-Roma civil society and independent experts were at least able to substantively contribute to the content thereof, and their input was significantly taken into account (DE, EL, FR, IT). However, in some cases, CSOs' effective participation was negatively affected due to political instability (BG) or depended on political affiliation with the government (HU) or membership in pre-existing consultative structures (ES, PL). The main criticisms are related to the fact that in many countries (BG, DE, ES, HU, NL, PL, RO), the governmental agencies responsible for NRSF development did not incorporate civil society's inputs. FR prevented such civil society's frustration by organising individual negotiations with the authors of comments. Additionally, to the fact that the most vulnerable groups of Roma who should be the primary beneficiaries of the NRSFs are usually not involved in this type of consultation; i.e., participation is often selective.

However, the strengthened involvement of Roma and pro-Roma civil society, specifically in developing NRSF documents, does not typically lead to the systemic improvement of their **participation in public policy** and active citizenship. Only a few NRSFs introduce new mechanisms or improve existing ones for Roma participation in terms of the development of specific policies with an impact on Roma: CZ – includes a comprehensive set of measures for improving Roma participation in policymaking, ESIF implementation structures including Monitoring Committees, and in several line ministries' consultative bodies; DE – mainly related to the fight against antigypsyism; EL – several new structures for NRSF monitoring and future revisions were established; FR – pertaining to problems of gens de voyage and shanty towns; and NL – a pilot project aimed at obtaining feedback about the public policies of interest to Roma. Even when consultative structures, including

² The lack of inclusion of Member States in this table either means that the civil society participating in the RCM initiative did not provide an assessment, or that they could not assess the change for a variety of reasons (e.g., the government did not develop an NRSF document).

the EC-funded national Roma platforms, are in place (BG, ES, HU, PL, RO, SK) they need to be improved to allow meaningful and effective participation.

To eliminate tokenism and make Roma participation more meaningful and effective, it is indispensable to invest in **Roma civil society's capacities** and pro-actively involve Roma at central and local levels. The reviewed NRSFs only seldom include such measures. Only some countries are planning to invest in training, international networking, and knowledge exchange (AT, EL, NL), or in financially supporting the development of civil society organisations' policy expertise and advocacy activities (CZ, DE, RO, SK). As the development of Roma and pro-Roma civil society is a social value per se, Member States should consider supporting the CSOs beyond the purchase of social services from them (the CZ experience with using the ESF for CSOs' institutional development may be a good example).

Very few efforts focus on strengthening the **participation of Romani women and youth** through the establishment of special consultative/cooperation platforms, thereby supporting their civic engagement and networking (AT, CZ, EL, IT, SK). Noteworthily, to encourage the active involvement of Roma women and youth, the IT strategy will provide for the election of their representatives into Italian national Roma platform and the EU Roma platform and offer young Roma internships or junior positions in national structures linked to the NRSF implementation. In SK, Roma youth will be involved in developing the mainstream national youth strategy, and the government will launch a dedicated grant programme for supporting the development of Roma youth CSOs. In AT, the strategy aims at linking and supporting the cooperation of mainstream women counselling organisations with Roma civil society.

2. CONTENT OF THE NEW NRSFs

In most Member States, the civil society reports indicate at least some improvement in the quality of the content of the NRSFs developed by the Member States in response to the 2020-2030 EURSF and the 2021 Council Recommendation:

cluster of countries ³	significant improvement	some improvement	some improvement & some worsening	no change	worsening ⁴
C1: the largest Roma populations and the most acute challenges	CZ EL		ES RO	BG HU SK	
C2: significant Roma populations	DE FR	IT			
C3: mid-sized Roma populations		AT HR NL		PL	
C4: the smallest Roma populations		SI		CY	EE LT LU ⁵

This improvement concerns the overall approach, recognition of the most serious problems that Roma face in respective countries, and, in less frequent cases, the formulation of specific measures for tackling these problems, and qualitative features of the NRSFs as credible policy documents (coordination of implementation, M&E, or allocated funding). On the other hand, many grave problems remain unaddressed by the NRSFs.

2.1. Approaches to Roma inclusion

The 2020-2030 EURSF constitutes a significant paradigm shift towards recognising the responsibility of the whole of society for the inclusion of Roma, on the one hand by acknowledging that the widespread antigypsyism/racism against Roma is a crucial barrier to effective inclusion (other barriers concern the overall ineffectiveness of governance, public policies and services, regional disparities in socioeconomic development, and others), and on the other hand, by realising that the majority/mainstream population (unlike the Roma) possesses the power, resources and all the instruments necessary for making the respective changes. Another significant shift in the 2020-2030 EURSF compared to the previous 2011 EU Framework for National Roma Integration Strategies (EUFW) is that it includes quantitative EU level targets related to the lives of European Roma to be achieved by 2030. This advancement, therefore, constitutes a step towards implementing the concept of equality of outcomes rather than mere formal equality of opportunities, which in reality usually does not provide for equity and real improvements

³ The lack of inclusion of Member States in this table either means that the civil society participating in the RCM initiative did not provide an assessment, or that they could not assess the change for a variety of reasons.

⁴ This category includes two countries, EE and LU, which did not develop a dedicated Roma strategy but instead, because of the low number of Roma, opted to create a set of mainstream measures for advancing Roma equality, inclusion and participation. However, in reality, and unlike in the previous period, following the 2020-2030 EURSF and the Council Recommendations they did not develop any document that would specify the relevant measures for ensuring Roma equality, inclusion and participation. We assess this development as worsening their approach to Roma inclusion. Their mainstream policies might have improved, worsened, or remained unchanged, but their decision has significantly reduced the accountability of their efforts to promote Roma equality, inclusion and participation.

⁵ In LU there is no Roma population, but other groups included under the umbrella term 'Roma' such as Yenish/Yéniche live there. In line with diverse international and EU documents, 'Roma integration/inclusion/equality' efforts should target these groups.

in the situation of Roma. However, these major novelties and changes are only partially reflected in the new NRSFs.

The efforts of the international Roma movement have resulted in recognition of the problem of **antigypsyism** in several NRSFs, often accompanied by specific measures for tackling this. DE has intensified the fight against antigypsyism by developing specialised institutions (appointment of the Federal Commissioner on Antigypsyism and establishment of the Monitoring and Information Office Antigypsyism), and ES by strengthening protection against discrimination. EL, although it does not use the term “antigypsyism”, addresses specifically racism and discrimination against Roma; within one of the main pillars of their NRSF, it foresees measures aimed at fighting racism and discrimination, stereotypes, hate crime, and hate speech, but it completely omits the serious problem of forced evictions of Roma. The recognition of antigypsyism has only seldom (DE, FR) led to its mainstreaming in diverse sectoral policy areas relevant for Roma equality and inclusion (that would mean changing the approach towards Roma – such as removal of hidden barriers, indirect discrimination or shift of responsibility for the policies ineffectiveness from Roma to the society or the state) , or even to reforms of mainstream policies that would make them more inclusive and effective. Instead, usually (AT, CZ, IT, RO, SK) it has been operationalised only as a standalone field of action (sometimes extensive and elaborate), including measures such as awareness-raising, campaigns, monitoring, education, and memorialisation.⁶ In some Member States (BG, HU), the NRSFs formally recognise antigypsyism as a problem, but the NRSFs do not formulate any measures for fighting it. Finally, some countries do not mention the concept of antigypsyism at all (DK, PL⁷).

Responsibility for the success or failure of inclusion policies frequently remains with the Roma themselves. A shift toward understanding mainstream society’s responsibility for the inclusion of more vulnerable populations can be identified in only few NRSFs. In these cases, it is not based on recognising antigypsyism or any other Roma-specific motivation, but rather as part of broader mainstream policy reforms such as more inclusive education (BG, CZ), fighting poverty (EL), the elimination of ghettos (FR), or strengthening protection from discrimination in all fields (DE). In IT, the NRSF explicitly declares the need to remove access barriers to some public services and desegregation.

Roma inclusion objectives are usually not the drivers of **mainstream policy reforms** – even in the case of countries where Roma exclusion and extreme poverty are to a large extent (alongside strong antigypsyism) caused by the profound ineffectiveness of various sector-based policies and services (welfare, public employment services, education, healthcare, housing), such as in SK, BG, HU, and RO.

Based on the important principle of the 2020-2030 EURSF that considers the **diversity** among Roma, several NRSFs (AT, BG, CZ, EL, ES, IT, SK; partially in HU and RO) pay more attention to the specific situations and needs of Roma women, youth, and children.

⁶ An emblematic example of this kind of double talk is identified in SK. On the one hand, the government has adopted a relatively progressive NRSF which recognises the problem of antigypsyism and formulates several specific measures to fight it. But on the other hand, the same government, with the support of fascist political parties, has adopted a package of financial aid for families that excludes most marginalised Roma (as families without employed parents are not eligible). Furthermore, the same law has even cut the pre-existing meagre financial support to children from families with the most profound social problems. All this is framed by a narrative about ‘decent people’ versus the ‘undeserving poor’.

Another example is HU, where despite recognising antigypsyism in the NRSF, the government continues to intensify anti-Roma sentiments. For example, the HU Prime Minister, Viktor Orbán, criticised a court decision condemning the school segregation of Roma pupils (the Gyöngyöspata case) and wanted to submit this ‘unfair judgement’ to ‘national consultation’.

⁷ In PL, traditional Romani culture is explicitly specified as one of the reasons for Roma’s social exclusion, and instead of fighting antigypsyism, the NRSF plans to ‘promote patriotic education’ among Roma to support their social integration.

Moreover, in some cases data collection on the outputs and results of Roma inclusion policies, disaggregated by gender, is systematically planned (AT, BG, CZ, ES, SK). In very few countries are the needs of Roma LGBTI- (CZ), disabled- (CZ) or elderly- (SK) Roma considered. And, in countries where intra-EU mobile Roma, Roma third-country nationals, or undocumented Roma are strongly excluded in social and integration policy (AT, BG, DE, DK, IT, FR, ES), they also remain unaddressed in the new NRSFs. Similarly, linguistic and intra-ethnic diversity among Roma is not considered in countries where it would be relevant (HU, RO, SK).

2.2. Relevance and omissions

Most of the NRSFs do not reflect the wider focus of the 2020-2030 EURSF, and their content remains limited to the four main sectoral policy fields (education, employment, healthcare, and housing); the fight against antigypsyism and discrimination; and in some cases (AT, CZ, DE, EL, ES, IT, RO, SK), on support for and the promotion of Romani culture (most often in the form of efforts to preserve 'traditional' culture and folklore, with little attention to Roma history or the development of contemporary arts and culture).

Social protection and poverty reduction are a priority in the 'old' Member States (EL, ES, FR), probably thanks to the high political priority of these agendas in mainstream social policies. However, in CEE countries, where Roma are facing the most profound poverty and welfare provisions have been significantly reduced since the post-Communist transformation (and policies strengthening redistribution have often intentionally left Roma behind – see Footnote 6), this problem remains conspicuously unaddressed. Official narratives, questioned by most experts, continue to perpetuate the narrowest understanding of neoliberal affirmations that education or 'activation' can resolve the problems of social exclusion that Roma face.

Although segregation in **education** is a critical/significant problem in many countries with large Roma populations, the measures put forward by concerned Member States (BG, CZ (EL, ES, HU, IT, RO and SK) are not sufficient to address this issue systematically. Success in secondary education is a field that has received increased attention in NRSFs (AT, CZ, EL, ES, HU); CZ and HU also aim at increasing Roma participation in tertiary education. Additionally, several Member States have focused on tackling the problem of Roma NEETs (AT, BG, EL, ES, HU, IT, SK).

Eliminating **residential segregation** in isolated rural settlements or urban ghettos is a *conditio sine qua non* for Roma inclusion in quite a few EU Member States. Despite the gravity of this problem, only a few countries have decided to tackle this actively (CZ, FR). Most of the affected countries (BG, EL, ES, HU, IT, RO, SK) opt for mapping and analysis of segregation, or in some cases improving living conditions in segregated communities, although it could be perceived that some interventions contribute to increasing the number of Roma living in segregation.

Critical or significant problems that members of civil society participating in the RCM have identified as the **most frequently omitted** or insufficiently addressed by NRSFs include:

problems: ⁸	omitted or insufficiently addressed by NRSF in:
<i>in the field of antigypsyism and discrimination</i>	
Prejudice	AT, BG, EL, HU, IT, PL, SE
hate crime	AT, BG, DE, ES, HU, EL, RO
hate speech	BG, DE, EL, ES, HU, PL, RO, SK
weak protection from discrimination	BG, DE, EL, ES, HU, IT, PL, RO, SK
misconduct by police	BG, DE, EL, ES, FR, HU, PL, RO, SE, SK
<i>in the field of education</i>	

⁸ The table only includes those problems identified **most frequently (in seven or more Member States)** in RCM reports that were delivered by the participating civil society organisations at the time of the development of this report. There are many other critical problems omitted by NRSFs, but they do not appear in this table, as they were identified as omissions in less than seven member states.

dropping out before completion of primary school	FR, HU, IT, PL, RO, SE, SK
early leaving from secondary school	AT, HU, IT, LV, PL, RO, SE, SK
secondary education/vocational training disconnected from labour market needs	BG, ES, HU, LV, PL, RO, SK
misplacement into special education tracks	AT, DE, ES, HU, PL, RO, SK
increased selectivity of educational systems and concentration in low quality schools	AT, BG, DE, EL, ES, FR, HU, IT, LV, PL, RO, SK
limited access to and support for online and distance learning	AT, BG, DE, EL, ES, FR, HU, IT, LV, PL, RO, SK
low-level digital competences among pupils	AT, BG, DE, EL, ES, FR, HU, IT, PL, RO, SK
in the field of employment	
low-level digital competences among adults	AT, BG, DE, EL, ES, FR, HU, IT, PL, RO, SE, SK
poor access to or effectiveness of public employment services	AT, CZ, ES, FR, IT, RO, SE, SK
discrimination by employers	AT, DE, EL, ES, HU, IT, LV, RO, SE, SK
disincentives to employment (such as indebtedness, low income from work compared to social income)	AT, DE, EL, ES, HU, IT, RO, SE
lack of employment support	AT, EL, ES, HU, IT, LV, RO
in the field of healthcare	
poor access to preventive care	AT, CZ, HU, IT, LV, PL, RO, SE
in the field of housing	
residential segregation and informal settlements	AT, BG, ES, HU, IT, RO, SK
forced eviction	AT, BG, EL, ES, FR, IT, HU, PL, RO
lack of security of tenure	AT, BG, ES, HU, IT, PL, RO, SE
overcrowding	AT, BG, DE, ES, HU, IT, LV, PL, RO
housing-related indebtedness and risk of eviction	AT, BG, DE, EL, ES, LV, PL, RO, SE
in the field of social protection	
limited access to income support schemes	BG, DE, ES, HU, LV, RO, SK
in the field of social services	
services not reaching the neediest individuals	AT, DE, ES, FR, HU, IT, PL, RO
lack of programmes for addressing indebtedness	AT, DE, EL, ES, HU, IT, PL, RO, SE
in the field of child protection	
specific vulnerability of Roma children as victims of violence	AT, BG, ES, FR, HU, IT, PL, RO
inadequate child/adolescent participation	AT, BG, DE, EL, FR, IT, RO
strengthening of parental responsibility and skills not available or not extended to Roma parents	AT, EL, ES, IT, PL, RO
biased treatment of Roma youth by security and law enforcement	AT, BG, DE, EL, ES, FR, HU, PL, RO, SK
in the field of Roma culture	
Roma history/culture not included in curricula and textbooks for both Roma and non-Roma	AT, ES, FR, HU, IT, PL, RO

3. QUALITY OF NRSFs AS POLICY STRATEGIES

The EURSF focus on **quantifiable targets**, FRA's activities in developing the portfolio of indicators, and the advocacy efforts of Roma and pro-Roma civil society and independent experts significantly affect the new NRSFs. The latter now often (AT, BG, CZ, EL, ES, HR, PL, SK) include measurable targets and indicators regarding several or all EU objectives, often defined at the 'result' level (change in the lives of Roma), instead of output (number of participants) or even input (money spent) indicators, typical of pre-2020 NRISs. Moreover, several Member States plan to systematically collect data disaggregated by gender (AT, BG, CZ, ES, SK). These improvements can be considered one of the most significant positive shifts in the post-2020 NRSFs.

In a few countries (CZ, DE – in several *Länder*, EL, ES, and SK), robust **M&E systems** have been elaborated that will systematically collect data and measure progress with Roma equality and inclusion. For example, in SK special Roma-SILC surveys are planned. In IT, the government will set up a new unit for M&E at the NRCP, and in AT a university will be commissioned to undertake the NRSF evaluation. In CZ, a long-term paradigm of implementing 'ethnically blind' social inclusion without the incorporation of ethnic data has been finally overcome, and the new strategy introduces a collection of ethnic indicators for assessing the benefit to Roma of general measures.

In contrast to the positive trend with M&E, clear and binding financial allocations for different planned initiatives that would increase the chances of the materialisation of the NRSFs are usually lacking. **Funding** mainly remains contingent on EU funds (BG, CZ, EL SK; among the CEE countries, PL is a positive exception that has committed significant state budget resources to implementing the NRSF).

The **coordination capacity of the NRCPs** remains weak in most Member States (BG, DE, EL, ES, FR, RO), and their role remains primarily limited to communication and reporting functions. A strengthening of the NRCP's mandate was reported only in two countries: In CZ, where the NRSF foresees implementation of a dedicated project aimed at increasing human and financial capacity of the NRCP,⁹ and in SK, where the NRCP will become an intermediary body for implementing Roma-targeted measures to be funded from the ESIF Roma allocation (this, however, creates a risk of further developing parallel and separate interventions for Roma and non-Roma). In no other country does civil society report the stronger involvement of NRCPs in ESIF implementation.

The weak mainstreaming of NRSF implementation at the local level, crucial for Roma inclusion, was identified as one of the main weaknesses in all countries with the largest Roma populations (BG, CZ, EL, RO, SK, but also in IT). In most policy areas, municipalities' participation in centrally designed measures is only voluntary, and is therefore contingent on local political leadership, interethnic relations (the rule of thumb is that the more profound the marginalisation of a local Roma community, the worse the relations with the majority holding political power), and financial resources, as local governments often must at least co-finance local projects.

⁹ In addition to the pre-existing NRCP, a new position of governmental plenipotentiary for Roma affairs and a dedicated office will be established to coordinate Roma equality, inclusion and participation policy (its complementarity with the NRCP is presently not clear).

4. CONCLUSIONS AND RECOMMENDATIONS

The improvement of Roma and pro-Roma civil society participation in developing NRSFs in many countries is a good step forward. It should be followed by strengthening their involvement in implementing, M&E, and reviewing different policies (including mainstream ones) that have an impact on Roma equality and inclusion.

1. Member States should also involve representatives of Roma and pro-Roma civil society in ESIF monitoring committees and working groups that help define conditions or calls for proposals associated with ESIF implementation. Handpicked and loyalty-based participation should not be accepted.
2. When commissioning evaluations of NRSFs, Member States should appraise Roma experts' or Roma and pro-Roma civil society involvement in public procurement conditions or criteria.
3. Member States with larger Roma populations should ensure that Roma are among those personnel at authorities who are in charge of Roma inclusion and other related policies. In the countries that have Roma with the necessary qualifications available, excuses for not having capable Roma staff are not credible.
4. The European Commission should condition grants to Member States' authorities that are aimed at supporting National Roma Platforms by specifying the partnership and involvement of Roma and pro-Roma civil society in the design and implementation of activities, thereby overcoming the latter's traditional passive position as recipients. The European Commission should also consider opening calls for national Roma platforms for competition that would enable entrusting the organisation of national Roma platforms to Roma and pro-Roma civil society organisations.
5. Roma and pro-Roma civil society should systematically build their expertise in specific policy fields (alongside the general focus on antigypsyism) and related sectoral legal and policy mechanisms (for example, education, employment, healthcare, housing, ESIF, etc.) to enable them to be partners for public administration.
6. Member States should use available EU Funds (incl. ESF+) to support the capacity-building of Roma and pro-Roma civil society.

The overall quality of the post-2020 NRSFs has improved in only half of the Member States. Among the main weaknesses are the omission of the Roma's most significant problems, including ineffective or exclusionary/discriminatory mainstream policies and services.

7. In action plans designed to materialise the NRSFs and NRSF revisions, Member States should aim to reform their mainstream policies through the consideration of the barriers (including institutional antigypsyism and structural disadvantages) that Roma and other vulnerable groups face in benefiting from them. Outreach and the effect of mainstream policies on the situation of Roma need to be monitored, as disparities usually signal hidden barriers or discrimination. Roma-targeted measures should primarily facilitate access to mainstream services or tackle specific problems experienced only or disproportionately by Roma.
8. The NRSFs must provide concrete measures for tackling the most severe structural problems of Roma exclusion (residential segregation, forced evictions, misplacement into special education, discrimination in the labour market and extreme poverty) – otherwise, any social inclusion efforts are not likely to be effective.

9. The European Commission can provide specific guidance and support the learning and exchange of knowledge in the areas of critical/significant problems that are most frequently omitted by NRSFs.
10. Countries with less developed targets and M&E frameworks can seek inspiration and learn from the other Member States that have better developed these elements in their NRSFs. In countries where collecting and processing ethnic data is not legally possible, the potential barriers or exclusion of Roma from mainstream policies can be detected via qualitative research methods and socio-demographic proxies, with the involvement of grassroots service providers and civil society organisations.
11. Member States with smaller Roma populations which do not intend to develop a dedicated Roma strategy, and instead have opted to create a set of mainstream measures, should present their NRSFs in the form of well-articulated documents explaining how such mainstream policies contribute to Roma equality, inclusion, and participation; what the safeguards are for preventing Roma exclusion; and establish a mechanism for the assessment of their effectiveness. Otherwise, their accountability will remain minimal.
12. The stronger involvement of subnational governance structures with autonomy in policy fields relevant to Roma equality and inclusion in NRSF implementation is indispensable for promoting their effectiveness. National strategies should be binding for these actors and the system of incentives and sanctions should be robust enough to ensure that national policy is enforced at the local level.

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