



# Diversity in the national Roma strategic frameworks *(ad hoc report)*

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# 1. INTRODUCTION

This report presents the approach of the current 'EU Roma Strategic Framework for Roma Equality, Inclusion and Participation' (EURSF) related to the diversity of Roma and assessments of civil society organisations (CSOs) participating in the RCM initiative concerning how the Member States' (MSs) 'National Roma Strategic Frameworks' (NRSFs) address this matter with special focus on Roma women and youth.

The paper provides insights – based on the CSOs' monitoring reports produced under the RCM initiative – into the efforts of MSs in their NRSFs to address the diversity of Roma and regarding to what extent the NRSFs reflect the needs of various Roma subgroups. The report also identifies positive examples of addressing diversity and offers a set of separate, comprehensive recommendations for MSs (state authorities and CSOs) and EU institutions derived from the monitoring reports.

## *Methodology*

In 2021 and 2022, CSOs developed [shadow monitoring reports](#) on the quality of the MSs' new post-2020 NRSFs as part of the RCM initiative. The findings of the monitoring reports served as the main source of information for the purpose of this report; their fourth chapters explicitly deal with the issue of diversity.

Additionally, five (DE, FI, FR, NL, RO) MS's NRSFs were selected for internal (in-house) review. These countries were selected based on reviewing the country monitoring reports developed by the CSOs participating in the RCM. NRSFs from countries where the respective monitoring reports indicated interesting content or found that the former do not address diversity, even though the society of the given country is diverse, were selected. The selective review of the NRSFs adds value to the reports by offering additional information on the topic besides the findings of the shadow monitoring reports. During the review of the original NRSFs, the same methodology was applied as described below.

Chapters of shadow monitoring reports and the five NRSFs were analysed according to twelve indicators, and conclusions were drawn accordingly. First, if the respective NRSF recognises Roma diversity was explored, then whether the NRSF addresses and focuses on the challenges of various Roma subgroups was identified.<sup>1</sup> Further, it was investigated whether the NRSFs address specific challenges of Roma subgroups separately (such as the employment of Roma women) and whether policy challenges are tackled cumulatively. Additionally, other chapters of the monitoring reports were reviewed to gain more insight into how NRSFs tackle the issue of diversity in terms of participation and relevance.

Specific attention was dedicated to examining which Roma groups are addressed by the NRSFs and how and to what extent. It was also considered crucial to scrutinise what measures and targets were identified that reflect the needs of Roma groups.

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<sup>1</sup> Women, youth, children, the elderly, EU Roma, stateless Roma, Roma with disabilities, non-EU nationals, LGBT+.

## 2. DIVERSITY OF ROMA

The term *Roma* was adopted at the first World Roma Congress in London in 1971 as an umbrella term to include different subgroups of Roma communities.<sup>2</sup> It is pivotal to note that even these different Roma communities are not homogeneous.

According to the Council of Europe's *Factsheet on Romani Culture*, Roma are heterogeneous communities in social and cultural terms.<sup>3</sup> Within Roma communities, there are various groups that can be further divided into subgroups. The same report points out that different historical, social, and cultural developments have affected Roma communities in their various countries of residence.<sup>4</sup>

Similarly, a report by Phiren Amenca draws attention to the diversity of Roma communities by claiming that the term Roma covers a variety of linguistic and cultural characteristics. Furthermore, it specifies Roma, Sinti, Kale, Travellers, etc., to demonstrate the diversity of groups among Roma communities.<sup>5</sup>

Dissimilarity can be observed within Roma communities in social and cultural terms and along economic and religious lines. Roma communities vary significantly in terms of qualifications, with impacts on economic stability, while poverty can also be observed among Roma communities.<sup>6</sup> The Phiren Amenca report also stresses how the mainstream approach overlooks economic divergence among Roma communities. Accordingly, Roma communities, in general, are subject to economic generalisations, such as being categorised as “poor” due to their socioeconomic status. While this misdiagnosed label cannot be applied to all Roma people, it does reflect the Roma as a whole.<sup>7</sup>

Roma belong to Muslim, Protestant, Catholic, Orthodox, and Christian religious groups. Considering the various other social, economic, religious, and other cleavages, Roma communities are as heterogeneous as any other group,<sup>8</sup> including women, youth, the elderly, children, etc.

It is also relevant to stress the diversity of Roma youth as a group. Different subgroups within this population include disadvantaged young Roma, young Roma women, and young Roma people with disabilities. Moreover, intersectionality plays a significant role within Roma

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<sup>2</sup> Worldromacongress.com, First World Roma Congress, 2023. Available at <https://worldromacongressart.com/the-archive/first-world-roma-congress/>

<sup>3</sup> Council of Europe, Roma and Travellers Team, Factsheets on Romani Culture. Available at <https://rm.coe.int/factsheets-on-romani-culture-1-8-social-organisation-and-family-struct/1680aac36c>

<sup>4</sup> Ibid.

<sup>5</sup> Phiren Amenca, Roma Youth Participation in Europe, Challenges, Needs and Opportunities, 2020. Available at: [https://phirenamenca.eu/wp-content/uploads/2021/06/Research\\_1\\_ONLINE\\_opt-1.pdf](https://phirenamenca.eu/wp-content/uploads/2021/06/Research_1_ONLINE_opt-1.pdf)

<sup>6</sup> Council of Europe, Roma and Travellers Team, Factsheets on Romani Culture. Available at <https://rm.coe.int/factsheets-on-romani-culture-1-8-social-organisation-and-family-struct/1680aac36c>

<sup>7</sup> Phiren Amenca, Roma Youth Participation in Europe, Challenges, Needs and Opportunities, 2020. Available at: [https://phirenamenca.eu/wp-content/uploads/2021/06/Research\\_1\\_ONLINE\\_opt-1.pdf](https://phirenamenca.eu/wp-content/uploads/2021/06/Research_1_ONLINE_opt-1.pdf)

<sup>8</sup> Federaal Migratiecentrum, Chapter 2: Overview of The Internal Diversity Within Roma Communities, 2017. Available at: [https://www.myria.be/files/PART\\_2.2.pdf](https://www.myria.be/files/PART_2.2.pdf)

youth, as in any other society. For instance, LGBT+ issues, mobility, and migration are elements that further contribute to the multiplicity of Roma youth.<sup>9</sup>

The next chapter examines how the 'EU Roma Strategic Framework' addresses the diversity of Roma communities. However, it is pivotal to stress that NRSFs should not only address diversity in sociological terms but also through the lenses of multiple discrimination and intersecting inequalities and the associated problems and concepts.

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<sup>9</sup> Ibid.

### 3. DIVERSITY IN THE EU ROMA STRATEGIC FRAMEWORK

The current EURSF issued by the European Commission in 2020 not only addresses Roma's socioeconomic exclusion but also aims at their broader equality, inclusion, and participation.

The EURSF also projects significant development from the perspective of diversity. It includes a dedicated annexe with specific guidance for MSs for planning and implementing their NRSFs to reflect diversity.

The EURSF also recognises that not all Roma are socially excluded, but all are subject to discrimination and disempowerment.<sup>10</sup> This observation further refines our understanding of the above-mentioned economic diversification among Roma communities.

Another pivotal element of the EURSF concerning diversity is the specified objectives for Roma women and youth. The fifth sectoral objective, namely to “Increase effective equal access to quality and sustainable employment”, reflects the needs of Roma women in employment and the needs of Roma youth not in employment, education or training (NEET). Under this objective, specific targets and measures are identified to include those two subgroups.<sup>11</sup> The EURSF recognises diversity within Roma communities. Furthermore, it also provides guidelines for how MSs shall meaningfully promote diversity and tackle issues of various Roma subgroups.

According to the EURSF,

“Member States should ensure that their strategic frameworks cover all Roma on their territory and reflect the needs of diverse groups through an intersectional approach. They should bear in mind how different aspects of identity can combine to exacerbate discrimination. They should set quantitative and/or qualitative targets to ensure that diversity in terms of age, gender, sexual orientation, mobility, and other personal characteristics is reflected.”<sup>12</sup>

The EURSF provides further guidance for MSs on targets and measures as follows:

“National frameworks should set out: targets and measures for specific groups (Roma children, women, young people, older Roma or those with disabilities, EU mobile citizens, non-EU nationals, stateless Roma) to reflect diversity among Roma, including gender-responsive and child/age-sensitive measures.”<sup>13</sup>

Considering the above-specified instructions to MSs, the next chapter provides an overview of how NRSFs address the diversity of Roma communities.

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<sup>10</sup> Ibid.

<sup>11</sup> Ibid.

<sup>12</sup> Ibid, p.7

<sup>13</sup> Ibid, p.8

## 4. NATIONAL ROMA STRATEGIC FRAMEWORKS ADDRESSING THE DIVERSITY OF ROMA

### 4.1. Recognition of diversity

Prior to interpreting the data gathered from the monitoring reports, it is pivotal to clarify what demonstrates that an NRSF recognises Roma heterogeneity. We have considered an NRSF as recognising diversity if it expressively acknowledges the heterogeneity of Roma, or each subgroup of Roma defined in the EURSF is included therein. If only a few Roma subgroups are included in the NRSF, it is deemed to only “partially recognise” the heterogeneity of Roma. The recognition of heterogeneity does not necessarily imply that the respective NRSF adequately and meaningfully tackles the challenges of Roma groups.

Out of 24 NRSFs, 10 (AT, BG, CZ, ES, FI, FR, HR, IE, PL, SK) were assessed by the CSOs as explicitly recognising the diversity of Roma communities. Please note that the reports by FI and FR are exceptions since their assessments of diversity were conducted in-house.

Eight (BE, DE, EL, HU, LT, RO, SE, SI) NRSFs partially recognise Roma heterogeneity. Such MSs tend to identify only certain subgroups of Roma, such as women, children, and youth. Six (CY, DK, EE, IT, LV, NL) NRSFs do not recognise Roma heterogeneity at all; no Roma subgroups are mentioned, implying that Roma are treated as a homogeneous group in these MSs.

*Table 1. NRSFs’ recognition of the heterogeneity of Roma communities*

| <i>Cluster</i>  | <i>Explicitly recognises</i> | <i>Partially recognises</i> | <i>Does not recognise</i> |
|---|------------------------------|-----------------------------|---------------------------|
| <b>C1: member states with the largest Roma communities and/or most acute challenges</b>               | BG<br>CZ<br>SK<br>ES         | EL<br>HU<br>RO              |                           |
| <b>C2: member states with larger Roma communities</b>   | FR                           | DE                          | IT                        |
| <b>C3: member states with mid-size Roma communities and developed Roma civil society</b>              | AT<br>FI<br>HR<br>IE<br>PL   | BE<br>SE                    | NL                        |
| <b>C4: member states with smaller Roma communities and limited or non-existent Roma civil society</b> |                              | LT<br>SI                    | CY<br>DK<br>EE<br>LV      |

Interestingly, MSs belonging to Clusters 1 and 3 are among those – in most cases – that either fully or partially recognise Roma heterogeneity. The reason why Cluster 1 countries perform well is probably because these MSs have the largest Roma communities and the most developed and impactful Roma civil society organisations. Cluster 3 countries are typically home to quite well-developed Roma civil society organisations as well as mid-size Roma communities. These two elements explain why these countries are more sensitive to diversity. Additionally, previous meaningful policy interventions in these MSs might also play a significant role in this regard (further investigation may address this issue). As for those NRSFs



that do not recognise Roma heterogeneity, most Western European and Baltic MSs fall into this category.

## 4.2. Roma women

Since Roma women face multiple discrimination in each policy area, it is indispensable to examine the responses of NRSFs to this subgroup. Eighteen MSs (AT, BE, BG, CZ, DE, EL, ES, FI, FR, HR, HU, IE, LT, PL, RO, SE, SI, SK) specifically mention Roma women in their NRSFs and recognise the challenges they face.

These NRSFs generally recognise Roma women as a target group; however, in most cases, objectives, targets, and measures remain insufficient. Challenges faced by Roma women are evident in the fields of employment, health and partial education, gender-based violence and human trafficking, while these matters are not typically meaningfully tackled by the NRSFs. The difficulties faced by Roma women are usually framed in line with the four main policy areas.

The German NRSF formally recognises the multiple marginalisation of some subgroups, specifically women. It frames the policy-level exclusion of Roma women as a result of intolerance, marginalisation, and prejudice against them. It also refers to systemic tools in the field of employment that focus on women and youth. However, it is pivotal to highlight that the German NRSF does not foresee the monitoring and evaluation of results disaggregated by gender or other criteria that would reflect the diversity among Roma.

The Romanian NRSF defines ten “Common Basic Principles”, the tenth of which is “Gender Awareness”. In line with this principle, the NRSF aims to encourage and ensure the participation of Roma women and girls in higher education and qualification and increase their presence in the labour market. Roma women are also mentioned under entrepreneurial initiatives and skills development. Additionally, the NRSF recognises that women and girls often experience racial or gender bias in access to health and other public services.

The NRSF of Poland approaches the topic from an angle that partially blames Roma and Roma culture for the exclusion of Roma women.<sup>14</sup> According to the Polish NRSF, “...Roma women are more motivated to take up integration measures and in practice play the role of a conveyor belt motoring changes in the Roma environment. At the same time, they are a group exposed to intersectional discrimination on the grounds of their ethnic origin, gender, low social and economic status as well as the patriarchal model of Roma culture.”<sup>15</sup> In other words, Roma culture is presented in the Polish NRSF as an element that further deepens or contributes to the challenges Roma women face.

The NRSF also describes some measures to tackle these issues, as follows: “... Roma women should be provided with particular support under the current integration programme. This can be done, [in] among other [ways], by financing conferences, training, workshops and

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<sup>14</sup>European Commission, Roma Civil Monitor, Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Poland, 2022. Available at: <https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C3-Poland-CATALOGUE.pdf>

<sup>15</sup> Programme for Social and Civic Integration of the Roma Community in Poland for 2021-2030, Ministry of the Interior and Administration p.63. 2020. Available at: <https://www.gov.pl/web/mniejszosci-narodowe-i-etniczne/programme-of-roma-integration-2021-2030>

exercises for women and girls of Roma origin aimed at strengthening the broadly-understood potential of women and girls in all areas of community life as well as providing the appropriate tools and skills for smooth functioning in the modern world. Particular attention should be paid to limiting and preventing the phenomenon of early marriage and motherhood which reduces [the] secondary education perspectives of Roma girls.”<sup>16</sup>

Despite the fact that the Polish NRSF focuses to some extent on Roma women and their challenges, and offers some related measures, it is problematic how Roma culture is portrayed in a stereotypical way.

### *Promising examples*

Regarding Roma women’s involvement in the NRSFs, not only problematic aspects can be reported. For instance, in Slovakia, the indicators defined in the global and sub-objectives for each area show that measures and activities target different groups, such as women, children, youth, and the elderly. The Slovak NRSF’s action plan further specifies various activities that target Roma women and youth, such as their involvement in an advisory board and promoting Roma men and women’s participation in working groups that monitor the implementation of national strategies and action plans.<sup>17</sup>

Another positive trend has been identified by the RCM synthesis report, which states that “... 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).”<sup>18</sup>

The Czech NRSF also contains relatively progressive approaches regarding the cause of Roma women. Gender considerations are taken into account in different fields, such as employment, segregation, health (forced sterilisation), discrimination and gender-based violence. In other words, the Czech NRSF considers gender a crosscutting element among various policy fields and areas of discrimination.

The French NRSF refers to the protection of Roma women who are victims of sexual exploitation. Also, special attention is paid to Roma women in terms of activities aimed at improving access to housing. Furthermore, pregnant women and newborn children will be the target groups of an experimental initiative planned in the NRSF that is to be piloted in four locations in 2021.

The Finnish NRSF calls attention to the importance of Roma women’s participation and challenges in health and education.

In addition, the Bulgarian NRSF specifies objectives targeting Roma women in its strategy for promoting equality in all four policy areas. Furthermore, adequate targets and measures are presented in the strategy for youth, especially children in education and women in employment. Another rather valuable effort is contained in the Spanish NRSF, where measures

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<sup>16</sup> Ibid

<sup>17</sup> European Commission, Roma Civil Monitor, Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Slovakia, 2022. Available at: <https://romacivilmonitoring.eu/wp-content/uploads/2023/07/RCM2-2022-C1-Slovakia-FINAL-PUBLISHED-CATALOGUE.pdf>

<sup>18</sup> European Commission, Roma Civil Monitor, 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, 2022. Available at: [https://romacivilmonitoring.eu/wp-content/uploads/2023/09/RCM\\_2022\\_Synthesis-report.pdf](https://romacivilmonitoring.eu/wp-content/uploads/2023/09/RCM_2022_Synthesis-report.pdf)

and targets are primarily well-defined for children in education, youth in NEET, and youth at risk of discrimination.

### 4.3. Roma youth

The next Roma subgroup to be examined more closely is Roma youth. Altogether, 16 MSs (AT, BE, BG, CZ, EL, ES, FI, FR, HR, HU, IE, LT, PL, RO, SE, SK) included Roma youth in their NRSFs. Comparing the list of countries that recognise Roma women with those that include Roma youth, the two groups of countries are almost identical. In other words, MSs that include Roma women in their NRSFs tend to do the same for Roma youth.

Considering the sufficiency of addressing the challenges of Roma youth, the NRSFs do not define meaningful targets and adequate measures for tackling specific issues. Most of the NRSFs' measures and targets are only related to youth in NEET or education. Other dimensions affecting the presence and future of Roma youth, such as employment, housing, public and political participation, access to social services and general exclusion, are not taken into account.

#### *Promising examples*

The Swedish monitoring report states that “[w]omen and children are special priorities in the strategy. [This] includes the overarching goal that a Roma youth who turns 20 in 2032 should have equal opportunities in life as a non-Roma in Sweden.”<sup>19</sup>

The Czech Republic’s NRSF, however, is an excellent example of the inclusion of Roma youth as a cross-cutting horizontal theme, represented in all chapters.<sup>20</sup> Specific objectives and meaningful measures are developed, although mainly in the field of education and partially in antigypsyism.

It is worth mentioning that the French NRSF contains a dedicated section on youth employment. In related fields of activity (education, housing, and employment), the monitoring of results for respective specific groups (children, women, and youth) is planned. Additionally, the French NRSF refers to the action plan for fighting human trafficking, in which children and youth are defined as particularly vulnerable and specific measures are aimed at their protection.

The Finnish NRSF mentions Roma youth and children in a section on tackling antigypsyism, racism and discrimination. The strategy recognises that discrimination and racism limit the outlook of Roma youth and children, and calls attention to the need to support the well-being of these two subgroups. Youth and children are also identified as target groups for health, employment, education, and social service provisions. Interestingly, the NRSF also mentions the importance of financial literacy, crime prevention, and the participation and inclusion of Roma youth.

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<sup>19</sup> European Commission, Roma Civil Monitor, Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Sweden, 2022. Available at: <https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C3-Sweden-CATALOGUE.pdf>

<sup>20</sup> European Commission, Roma Civil Monitor, Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Czechia, 2022. Available at: <https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C1-Czechia-FINAL-PUBLISHED-CATALOGUE.pdf>

As mentioned above, MSs that include Roma women in their NRSFs also recognise Roma youth in most cases. In other words, problems Roma women may face are mostly mentioned and understood in tandem with those of youth/children. This conclusion is based on the content in NRSFs that address Roma youth and women. However, this conclusion only concerns the matter of recognition. Furthermore, there is a certain level of synergy between the two subgroups – for instance, regarding care duties. However, if this is the only perspective, it is highly problematic since the challenges Roma women face should not only be framed through the lens of childcare. Similarly, if the topic of youth is addressed in the “women and children” agenda, as in the Swedish NRSF, this is also problematic. This approach suggests that Roma women and youth/children are being treated as a duality. Despite this, such a dual approach is still preferable to completely omitting attempts to address the challenges of these two subgroups.

#### 4.4. Other subgroups

##### 4.4.1. LGBT+

Considering the diversity of Roma communities, Roma LGBT+ communities also need to be addressed.

Of the 24 NRSFs, only four (BE, CZ, ES, IE) were assessed by CSOs as explicitly including Roma LGBT+ communities. Out of these four, three are associated with Western European countries. However, considering the number of NRSFs (24) and the number of NRSFs that address this community (4), further conclusions cannot be drawn due to the lack of representativeness of data. Notably, other Western European countries with a large Roma population and strong acceptance of LGBT+ (Spain, France) do not mention LGBT+ in their strategies. All in all, it cannot be concluded that Western European countries perform better at including LGBT+ communities in their NRSFs. Not surprisingly, of the four countries whose reports mention LGBT+, one is Czechia, a CEE country with a larger Roma population (suggesting strong acceptance of LGBT+ issues).<sup>21</sup> The Czech NRSF also shows a progressive attitude in other fields, such as participation and relations with women and youth.

LGBT+ communities are identified as target groups in all four NRSFs. In the cases of Belgium and Spain, no specific measures or activities are defined, despite the recognition of the multiple forms of discrimination these communities face.

The Czech NRSF not only recognises the existence of Roma LGBT+ communities in its analytical section, but also includes specific objectives and measures related to them. Several mainstream measures for Roma (such as ensuring social housing) mention that the interventions should be sensitive to the LGBT+ communities within the Roma target group.

The Irish NRSF also pays attention to LGBT+ communities by specifying three specific activities in one thematic area: cultural support.

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<sup>21</sup>European Commission, Perception of minorities in the EU: LGBTI people, 2019. Available at: [https://commission.europa.eu/document/download/013fe693-04f6-496e-8821-2c06a39155e3\\_en?filename=infographics\\_2019\\_lgbti\\_final.pdf](https://commission.europa.eu/document/download/013fe693-04f6-496e-8821-2c06a39155e3_en?filename=infographics_2019_lgbti_final.pdf)

### *Promising examples*

According to the civil society's monitoring report on Spain, "the NRSF encourages the formation of associations for Roma youth, Roma women, and Roma LGBT+ people, although it does not specify how or in what ways this should be done".<sup>22</sup> Although limitations exist regarding the manner of establishing and operationalising such associations, this is still considered a progressive idea.

Apart from the above-mentioned positive developments in the Czech NRSF, additional good examples can be reported; however, those are related to diversity-related considerations in relation to participation that will be discussed in the next chapter.

#### 4.4.2. Roma with disabilities

Another subgroup to be examined is Roma with disabilities. Only five (ES, FI, FR, IE, RO) MSs specifically included them in the NRSFs. It is mainly Western European countries that address these communities within the NRSFs. Since the number of countries is notably small, larger-scale comprehensive conclusions cannot be drawn.

In two of these countries (ES, FI), measures and targets are not developed for addressing the specific needs of Roma with disabilities. In the case of the ES NRSF, this group is named in the NRSF but not identified as a specific target group, and no well-defined activities are planned.

The Finnish NRSF draws explicit attention to particularly vulnerable persons among Roma, with a focus on Roma with disabilities. It also recognises discrimination against this subgroup as an important element in the oversight of health and social services.

In the case of Ireland, the NRSF specifies ten activities related to mental health and well-being.

The French NRSF contains a dedicated section on people with disabilities that only summarises considerations about the needs of this specific group in mainstream policies but does not introduce targeted measures concerning Roma with disabilities.

The Romanian NRSF partially address the topic only within the context of Roma women. It states that targeted services for women and girls with disabilities and other groups of women and girls in vulnerable situations are lacking.

It can be concluded that the number of MSs that recognise the challenges of Roma with disabilities in their NRSFs is particularly small. Furthermore, even these MSs do not develop measures and targets in their NRSFs. Thus, the issue of Roma with disabilities remains at the level of recognition and on a limited scale.

Furthermore, of the modest number of NRSFs that recognise the challenges of Roma with disabilities, good examples cannot be reported.

The poor attention of the NRSFs to Roma with disabilities is problematic from various further perspectives. For instance, Roma are known to be primarily employed in jobs of heavy, often outdoor physical labour, subject to occupational risks. Furthermore, Roma are also subject to

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<sup>22</sup> European Commission, Roma Civil Monitor, Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Spain, 2022. Available at: <https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C1-Spain-V2-FINAL-PUBLISHED-CATALOGUE.pdf>

diminished access to quality health care, have a shorter life expectancy, and disadvantaged housing conditions. All these issues suggest the enhanced need to immediately address disability-related challenges.

#### 4.4.3. Stateless Roma

Considering the multiple discrimination and antigypsyism Roma communities face, as well as recent circumstances, it is essential to examine how NRSFs address stateless Roma communities.

The review of all 24 civil society monitoring reports on the quality of NRSFs showed that only one MS included mention of stateless Roma – Italy.

According to the Italian shadow monitoring report, "one chapter of the NRSF is related to the development of the statelessness issue, where, especially in relation to Roma children, the measures taken are particularly weak".<sup>23</sup> The same report also refers to the issue of the absence of specific activities related to statelessness, especially regarding the conditions of Roma children.<sup>24</sup>

Since only the specific and standalone Italian NRSF considers and includes stateless Roma, no conclusions about patterns or tendencies can be drawn. However, the situation clearly demonstrates that the topic remains largely unaddressed by the NRSFs.

#### 4.5. Diversity considerations in relation to participation

The EURSF and the 2021 *Council Recommendation for Roma Equality, Inclusion and Participation* strongly emphasise the importance of Roma participation. MSs are encouraged to facilitate the involvement of Roma and pro-Roma civil society in consultations and the design and development of the new NRSFs and Roma-related policies.

How well diversity is addressed plays a crucial role in judging the quality and intensity of various Roma communities' and groups' involvement in the design and development of the NRSFs (and ideally beyond – in the design, implementation, monitoring, and evaluation of the various public policies that impact them).

Considering NRSFs' initiatives that focus on strengthening the participation of Roma women and youth, it can be stated that few efforts have been made.<sup>25</sup> According to the assessment of the CSOs participating in the RCM initiative (for the summary, see the [2022 Synthesis Report](#)), only five NRSFs (AT, CZ, EL, IT, SK) envision specific activities for increasing the participation of Roma women and youth.<sup>26</sup>

##### *Promising examples*

The Austrian NRSF has defined a measure called "Networking women's counselling institutions with Roma civil society". The aim is to develop cooperation between mainstream

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<sup>24</sup> Ibid.

<sup>25</sup> European Commission, Roma Civil Monitor, 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, 2022. Available at: [https://romacivilmonitoring.eu/wp-content/uploads/2023/09/RCM\\_2022\\_Synthesis-report.pdf](https://romacivilmonitoring.eu/wp-content/uploads/2023/09/RCM_2022_Synthesis-report.pdf)

<sup>26</sup> Ibid.

women's counselling organisations and Roma civil society. Additionally, networking is identified as another measure for targeting Roma youth. However, the civil society monitoring report on Austria points out that specific steps for achieving these goals are missing.<sup>27</sup>

The Czech civil society monitoring report indicates significant development regarding the participation of various Roma community subgroups. Most importantly, a broader assemblage of groups, including various organisations and individuals, participated in developing the NRSF. For instance, entities/experts participated in representing the interests of Roma women, LGBT+ Roma men and women, Roma children, and other groups, and allowed them to have a voice in setting the goals and measures included in the NRSF.

The Greek NRSF similarly promotes participation and consultation with Roma communities, particularly Roma women and youth, at all planning, implementation and monitoring levels.

To encourage the involvement of Roma women and youth, the Italian NRSF will provide for the election of their representatives onto the national Roma platform and the EU Roma platform and offer young Roma internships or junior positions in national structures linked to the NRSF implementation.

Two thematic working groups were established to develop Slovakia's NRSF. Roma women, as external experts in their respective fields, facilitated these two thematic working groups. The NRSF addresses not only Roma women but also Roma youth. Roma youth will be involved in developing the mainstream national youth strategy, and the government will launch a dedicated grant programme to support the development of Roma youth CSOs.

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<sup>27</sup> Ibid.

## 5. CONCLUSIONS

The EURSF recognises the heterogeneity of Roma communities and provides guidance for MSs to address the diversity of Roma communities. The MSs have been requested to reflect the needs of diverse groups through an intersectional approach, hand in hand with developing meaningful targets and measures to tackle the challenges of Roma groups adequately.

More than one-third of the examined NRSFs explicitly recognise Roma communities as heterogeneous, one-third partially recognise them, and one-quarter do not consider the heterogeneity of Roma communities at all.

Three-quarters of the MSs include Roma women in their NRSFs, recognising them as a target group. However, in most cases, objectives, targets, and measures remain unclear and insufficient. Challenges of Roma women are identified in the fields of employment, health and partially education and human trafficking, although these matters are not meaningfully tackled.

More than half of the examined MSs included Roma youth in their NRSFs. However, meaningful targets and measures for tackling specific youth issues are not demonstrated. Only a few specific challenges of Roma youth are recognised, such as education and NEET, while other relevant challenges are omitted. It is also pivotal to highlight that NRSFs that address Roma women also tend to include Roma youth.

Similarly, other Roma community subgroups, such as LGBT+, Roma with disabilities and stateless Roma, are, to a small extent (only in four NRSFs) recognised by the NRSFs. In most cases, targets and measures are not defined for these subgroups, except in the Czech NRSF for LGBT+ communities.

On the other hand, when participation considerations are reviewed from the perspective of diversity, the CSOs reported significant developments.

Regarding the relevance and quality of targets and measures developed in the NRSFs, it can be concluded that these are moderately developed and rather insufficient/irrelevant for adequately tackling the issues Roma subgroups face. The presented targets and measures in most cases address Roma youth in NEET, Roma children in education and Roma women in the areas of employment and discrimination. Other relevant challenges of the target groups remain unaddressed.

Apart from the critical weaknesses of NRSFs concerning the above-mentioned aspects, there have been positive developments in Czechia, Slovakia, Spain, and Sweden in this regard.



## 6. RECOMMENDATIONS

For the European Union:

- provide guidance to MSs on how to implement an intersectional approach in their respective NRSFs. For example, the EC's regular assessment of NRSFs should focus on diversity and intersectionality, providing the MSs with further expert guidance on tackling these topics and supporting mutual learning in this field.
- encourage MSs to further develop their portfolio of indicators disaggregated for the diverse subgroups of Roma, as is relevant, with particular attention to subgroups particularly vulnerable to exclusion in the given field.
- recommend that MSs include specific targets and measures in their revised NRSFs in consultation with CSOs and experts on diversity, gender, and youth issues.

Member States should:

- recognise the diversity of Roma communities and formulate specific measures to address their needs with a particular focus on women, youth, children, disabled Roma, and LGBT+. Additionally, MSs should recognise not only these groups but also subgroups within them, such as Roma women with disabilities, Roma youth with disabilities, etc.
- make efforts to promote the understanding and perception of, and sensitivity to diversity.
- develop specific objectives, adequate targets, and measures that meaningfully tackle the challenges of each Roma group to an equal degree. Intersectionality should be introduced as an approach during these efforts. Targets and measures should reflect the scale of the specific issues Roma groups face and cover all fields where Roma groups encounter difficulty.
- Involve members of civil society and experts in policy development. According to experiences with various fields of inequality, it is the latter who best understand such intersectional problems.

Civil society organisations:

- Should seek to elevate the factors of gender, age, sexual orientation, religion, etc., on political and policy agendas to more efficiently address the challenges of Roma subgroups.