

REPORT

REVISITING THE EU ROMA FRAMEWORK:

Assessing the European Dimension for the Post-2020 Future

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ACRONYMS AND ABBREVIATIONS

CSO	Civil Society Organisation
CSR	Country-Specific Recommendation
DG	Directorate-General
EC	European Commission
EP	European Parliament
EU	European Union
FRA	Fundamental Rights Agency
MFJ	Multi-annual Funding Framework
NRCJ	National Roma Contact Point
NRIS	National Roma Integration Strategy
OSCE	Organisation for Security and Cooperation in Europe
UK	United Kingdom

EXECUTIVE SUMMARY

The goal of this paper is to provide a shadow report to the European Commission (EC) on the practical implementation of the EU Roma Framework (the Framework) for National Roma Integration Strategies (NRIS) between 2011 and 2016. The report is based on desk research and **27 responses** to a questionnaire distributed to active Roma and pro-Roma civil society organisations in **nine countries**: Bulgaria, the Czech Republic, France, Hungary, Italy, Romania, Slovakia, Spain and the UK. It focuses primarily on the **European dimension** of the design and implementation of the EU Roma Framework, providing a critical overview of its relevance for the process of implementation of the NRIS in member states. The first section of the report not only provides an analysis of the EU Roma Framework, including the policy design, EU instruments for coordination, participation, funding, monitoring and evaluation, but it also offers an evaluation of the shifting context in the EU and a background of the Framework. The second section provides a brief assessment of the implementation of NRIS in selected countries. The last part of the report provides recommendations and presents views on the future of **EU Roma Framework post-2020**.

The report finds that although the very existence of the **EU Roma Framework is an achievement in itself** and represents a turning point for Roma communities in Europe, by design, it has several major shortcomings. The main weakness emphasized is the non-binding character of the EU Roma Framework as a **“soft” policy tool**. Furthermore, the **imprecise definition of the target group** – the Roma – leads to inconsistencies and incongruent approaches of NRIS across the EU; it also effectively excludes sectors of Roma population as it does not take into consideration the heterogeneous and intersectional reality of their lives. Moreover, the **absence of a response to anti-Gypsyism** in the EU Roma Framework results in reluctance to include explicit measures targeting anti-discrimination and specifically anti-Gypsyism in national strategies. **Additional thematic areas of activity** such as political participation, Roma arts and culture, identity and history and others were also identified which should be explicitly mentioned in the EU Roma Framework as complementary measures to the four main priority areas of education, employment, housing and healthcare.

With regards to EU instruments of implementation of the EU Roma Framework the report highlights the important role of the EC, which nonetheless should act more forcefully to exert pressure on member states. The **EU Roma Task Force** is identified as a potentially important instrument which allows for greater coordination of efforts across relevant Directorates-General (DGs). However, a lack of transparency, its limited visibility as an instrument and the evident limited internal coherence and synergy across DGs with regards to Roma inclusion make its effectiveness questionable.

The **Network of National Roma Contact Points (NRCP)** is also seen as potentially relevant, however, not much is known about its role and impact. The shortcomings of NRCPs at the national level were underlined, highlighting their limited mandates and competencies, lack of budget and sufficient staff as well as limited influence on decision-making processes.

With regards to **mechanisms of Roma participation**, the report argues that this principle is often fulfilled superficially and only partially. The EU Roma Framework does not provide any guidelines with regards to participation. As a result the most representative and legitimate Roma CSOs are not sufficiently involved in relevant policy-making processes and events such as the EU consultation meetings in Brussels, the **Roma Platform** and **Roma Summit events**.

With regards to EU funding mechanisms, the report found improvement in absorption of use of EU funds for Roma in comparison to the 2007-2013 programming period, thanks to the introduction of **ex ante conditionalities** and the **Country-Specific Recommendations (CSR)**. But member states continue to rely largely on EU funds and do not declare allocations from national budgets. Several problematic issues and practices related to financial investments were also highlighted. A

clear recommendation is for the **next multi-annual financial framework to prioritise Roma** among its major investment areas. Otherwise, any efforts on Roma inclusion in the future will have similarly bleak results as are shown through current research and data. In addition, **mechanisms of monitoring and evaluation**, despite progress, need improvement. In particular, this report underlines the lack of transparency and access to data, the absence of ethnic data collection as well as the infrequent use of external, independent evaluations and shadow reporting.

With regards to **measuring progress** in selected countries, the report indicates that **no significant progress has been made to close the gap between Roma and non Roma in all key areas** - education, employment, healthcare and housing - and in the field of anti-discrimination.

The report concludes by listing recommendations in key aspects which need improvement by 2020, namely: **make the EU Roma Framework mandatory**, make its **policy design more coherent**, increase the recognition of **anti-Gypsyism**, improved **mechanisms of Roma participation and monitoring and evaluation** as well as the need to **secure political commitment and assure funding**. Finally, the report concludes by analysing different directions of post-2020 Roma inclusion efforts and recommending that in the future, the **EU Roma Framework post-2020 should be maintained** but should undergo a **major, substantial reform**.

INTRODUCTION

In 2011, the European Commission launched the “EU Framework for National Roma Integration Strategies up to 2020”, endorsed by the European Council.¹ By 2012, member states submitted either NRIS or sets of policy measures and the Commission reports annually on their implementation. After five years of implementation, the European Commission (EC) is preparing an assessment on the midterm review of the EU Roma Framework, which will be the focus of the Commission’s 2017 report on Roma inclusion. The EC’s assessment will be based on its in-house knowledge, contributions by member states as well as views of civil society and international organisations.² With this report, the Open Society European Policy Institute (OSEPI) aims to contribute to the EC’s process of assessment by providing an overall analysis of the EU Roma Framework and the National Roma Integration Strategies’ implementation and progress between 2011-2016.

SCOPE OF THE REPORT AND NOTE ON METHODOLOGY

The main tool for this research was a questionnaire prepared specifically for the midterm review of the Framework by the Commission, to be used by civil society organisations (CSOs). To gather informed views from Roma CSOs, the original questionnaire developed by the EC was adapted and expanded (see Annex 3), seeking more in-depth and detailed responses on the different aspects of NRIS design, implementation and monitoring and evaluation. This adapted questionnaire also solicited input for the future of the EU Roma Framework post-2020. The questionnaire was distributed among the most knowledgeable Roma and pro-Roma CSOs from nine countries.

In total, 38 CSOs and individuals were contacted, out of which 27 responded to the questionnaire, a roughly 90% response rate from the targeted group.³ The response distribution was as follows: 3 from Bulgaria, 2 from the Czech Republic, 2 from France, 2 from Hungary, 2 from Italy, 4 from Romania, 3 from Slovakia, 6 from Spain and 2 from the UK. An additional response was also

¹ COM(2011)173 on an EU Framework for national Roma integration strategies, Council Conclusions (EPSCO) of 19th May 2011 An EU Framework for National Roma Integration Strategies up to 2020.

² http://ec.europa.eu/newsroom/just/item-detail.cfm?item_id=54326&utm_source=just_newsroom&utm_medium=Website&utm_campaign=just&utm_content=2017%20Commission%27s%20assessment%20on%20the%20mid-term%20review%20of%20the%20EU%20Framework%20for&utm_term=Tackling%20discrimination&lang=en

³ The list of all contributing organisations can be found in Annex 2.

submitted by an international umbrella organisation. The report was supplemented and the research compared to secondary data from the latest and most relevant reports available on the implementation of the Framework and NRIS.

It should be emphasized that this report focuses primarily on the European dimension of the design and implementation of the EU Roma Framework, providing an overview of its relevance for the process of implementation of the NRIS in member states. A more detailed and country-specific overview of findings is presented in a background report.⁴

This report is divided into three sections. The first part of the report analyses the EU Roma Framework, starting with a background of its development and a brief analysis of the shifting context in Europe. The main emphasis in this part is the evaluation of the Framework with the focus on the policy design and EU instruments such as mechanisms of coordination and participation, funding, as well as monitoring and evaluation. The second part provides a brief analysis of the implementation of NRIS in the nine countries. The last part of the paper provides recommendations and presents views on the future of the EU Roma Framework post-2020 process.

PART 1: OVERALL EVALUATION OF THE EU ROMA FRAMEWORK

1.1 EU Roma Framework - a turning point for Roma communities in Europe

For years before the existence of the Framework, Roma CSOs called upon the European Commission to adopt a Roma-specific strategy. In 2008, the European Parliament (EP) called on the Commission and the Council to adopt a Roma strategy,⁵ but the Commission did not respond. An EC reaction only came after the controversies surrounding deportations and evictions *en masse* of Roma from Bulgaria and Romania in France between 2009-2010. In 2011, the EU adopted Council Conclusions for a Roma framework,⁶ which set up the EU Framework for National Roma Integration Strategies (NRIS) going up to 2020. The Framework aimed to make a tangible difference to Roma lives by closing the gap between Roma and non-Roma in four main areas - education, employment, healthcare and housing - as well as asking for more funding, effective monitoring, non-discrimination, National Roma Contact Points (NRCP) and for the participation of CSOs in the process. Although criticized by some CSOs from the moment it was launched,⁷ the very existence of the EU Roma Framework, established in 2011, is an achievement in itself. It is the most comprehensive policy document adopted by the EC, targeting the socio-economic improvement of a single and largest minority in the EU - 10-12 million European Roma citizens.

The 2011 EU Roma Framework is a logical continuation of previous institutional efforts to improve the situation of Roma, feeding from experiences and progress made during the pre-accession period (mostly through the introduction of the “Copenhagen criteria”), other strategies such as the OSCE 2003 Roma Action Plan,⁸ but mainly inspired by the Decade of Roma Inclusion 2005-2015⁹. It is important to underline, however, that the Framework represents the most comprehensive, robust and best-equipped institutionalized Roma-specific policy to-date. Representatives of CSOs

⁴ Available from OSEPI upon request.

⁵ <http://www.europarl.europa.eu/sides/getDoc.do?type=MOTION&reference=P6-RC-2008-0050&language=EN>

⁶ <http://register.consilium.europa.eu/doc/srv?l=EN&f=ST%2010658%202011%20INIT>

⁷ <http://www.errc.org/cms/upload/file/erpc-euframework-reaction-05042011.pdf>

⁸ 2003 “Action Plan on Improving the Situation of Roma and Sinti Within the OSCE Area”.

⁹ “The Decade of Roma Inclusion 2005-2015” was an unprecedented international initiative – a political commitment that brought together governments, intergovernmental and nongovernmental organisations, as well as Romani civil society. Formally established in February 2005 in Sofia, it brought together the governments of Albania, Bosnia and Herzegovina, Bulgaria, Croatia, the Czech Republic, Hungary, Macedonia, Montenegro, Romania, Serbia, Slovakia and Spain (Slovenia, the United States, Norway and Moldova had observer status) in a joint effort to eradicate discrimination and “close the unacceptable gaps between Roma and the rest of society”. The Initiative was formally closed in 2015. <http://www.romadecade.org/about-the-decade-decade-in-brief> The EU Roma Framework was created to a great extent on the model of the Decade of Roma inclusion, for example, by establishing the same priority areas of action or the so-called 4 pillars: education, housing, healthcare and employment.

unanimously agree that its creation represents a turning point for Roma communities in Europe, which has had a significant impact for national Roma-related policy-making. In this sense, some symbolic, political, institutional, and to an extent, legislative progress is undeniable; the Framework became an instrument which mobilised member states to design national plans and measures aimed at improving the socio-economic situation of Roma in the EU.

Many CSO respondents underlined that, especially in the context of new EU member states (following the 2004 and 2007 enlargements) and the EU accession process, the Framework has been the key driver forcing national governments to act. Beyond designing the NRIS, the Framework along with the 2013 Council Recommendation,¹⁰ have mobilised governments to assign funding (both domestic and European) dedicated to implementing measures supporting Roma inclusion. In this context, the “*ex ante* conditionalities”¹¹ for the European Structural and Investment Fund (ESIF) have proved important for securing investment in Roma inclusion during the 2014-2020 financial period. The Framework has also initiated a policy process ensuring engagement of European institutions and different administrative levels in member states. As an instrument, it has contributed to bringing diverse stakeholders together, facilitating exchange and collaboration across countries, institutions and areas of activity, including Roma civil society representatives. Following CSO and EP recommendations, the Commission has also recognized anti-Gypsyism as an important issue to be addressed in its 2016 Roma report¹² by supporting the European Parliament resolution on anti-Gypsyism and the EU recognition of the Memorial Day of the Roma genocide.¹³ This was a major step in the fight against discrimination, prejudice, hate speech and violent attacks against Roma.

Despite these achievements, the EU Roma Framework, by design, has serious limitations. The finding of this report shows that the main weakness is the non-binding character of the Framework - a problem highlighted already in previous civil society assessments. While the Framework “encourages Member States, in proportion to the size of the Roma population living in their territories and taking into account their different starting points, to adopt or to develop further a comprehensive approach to Roma integration”,¹⁴ the countries can effectively avoid adapting specific Roma strategies. As a “soft” policy tool, the Framework’s major weakness is its lack of traction - while it provides a conceptual framework, a set of guiding principles and common priority areas, it is void of specific and mandatory measures. Although the Roma and pro-Roma CSOs appreciate the very existence of the Framework, deficiencies in its design and institutional set-up increasingly point to the need for its thorough revision, in order to move from words to deeds.

1.2 The Framework challenges in regard to the shifting context in Europe:

Although the Framework is undoubtedly a soft policy, one of its main achievements over the last five years is that it has managed not only to put, but also keep Roma higher on the political agendas of EU institutions as well as national governments. This is the reason, when the Framework was first launched by the EC, why there was a certain euphoria coupled with high expectations

¹⁰ Council Recommendation of 9 December 2013 on effective Roma integration measures in the Member States, [http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32013H1224\(01\)](http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32013H1224(01))

¹¹ “*Ex ante* conditionalities” are specific criteria established in partnership agreements, which are regarded as necessary prerequisites for effective and efficient drawing of funds from the European Structural and Investment Funds. General (fulfilled across programmes) and thematic (specific within a particular programme) *ex ante* conditionalities are powerful instruments which regulate the use of EU funds. There are specific thematic *ex ante* conditionalities which explicitly mention Roma (IP 9(ii) ‘Integration of marginalised communities such as the Roma’ in the ESF Operational Programme 2014-2020). “Guidance on *ex ante* Conditionalities for the European Structural and Investment Funds. PART II”

http://ec.europa.eu/regional_policy/sources/docgener/informat/2014/eac_guidance_esif_part2_en.pdf

¹² “Assessing the implementation of the EU Framework for National Roma Integration Strategies and the Council Recommendation on effective Roma integration measures in the Member States — 2016”, European Commission, 2016 http://ec.europa.eu/justice/discrimination/files/roma-report-2016_en.pdf

¹³ <http://www.europarl.europa.eu/sides/getDoc.do?type=TA&language=EN&reference=P8-TA-2015-0095>

¹⁴ <http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:52011DC0173> (page 3-4)

regarding the real change in the lives of millions of European Roma. However, since then a lot of things have changed and the climate for positive change in Roma inclusion has worsened.

Despite existing legislation, and the abundant body of recommendations and significant investment, there is no significant progress in the four priority areas of the Framework, and in some areas the situation has even deteriorated. This is exemplified in the 2015 Roma Inclusion Index report, which emphasises that since 2005 the situation of Roma has worsened and the gap with the total population has increased with regards to poverty, particularly the risk of poverty¹⁵. Parallel and multiple crises have contributed to this, and then amplified Roma exclusion by pushing Roma away from the agenda of the EU and governments. The economic crisis and its aftermath, including tightening social welfare, has been particularly severe on Roma in countries where it hit strongest, for example in Spain¹⁶, Greece, Portugal or Italy, among others. The social frustration with neo-liberal economic policy, coupled with the crisis of European democracy, magnified by the impact of the euro-zone crisis, paved the way for more populist, anti-European and nationalistic sentiments. The “refugee crisis” and terrorist attacks in several European cities reinforced this “swing to the right” and made a rhetoric of fear and insecurity central to the public.

All these circumstances and developments intensified xenophobic attitudes and ensured right and far-right parties’ electoral gains (in Czech Republic, Poland, the Netherlands, Austria, Germany, Bulgaria, Hungary, Slovakia, UK, France and Italy¹⁷). These circumstances have affected, directly and indirectly, the situation of Roma across Europe and placed Roma inclusion outside of the priority areas of member states. At the same time, anti-Roma sentiments and manifestations of anti-Gypsyism have been on the rise. Currently, the political will and commitment to Roma inclusion is declining¹⁸, mounting further obstacles to achieving tangible progress. The latest ‘White Paper on the future of Europe: Avenues for unity for the EU at 27’, which presents five scenarios for how the Union could evolve by 2025, shows that the future according to EC’s President Jean-Claude Juncker does not plan to include neither preservation of Roma rights and inclusion policies nor ideas on protecting any other vulnerable group in the EU. In light of this context the future for Roma is rather bleak and CSOs should keep in mind that they might need to adapt to the new circumstances and perhaps focus their attention on the work with the EU upcoming presidencies.

1.3 EU Roma Framework: Assessing the policy design

The EU Roma Framework can be regarded as a soft policy tool – a quasi-legal political instrument lacking legally binding force but which, nonetheless, provides political direction and becomes a conceptual frame of action. The “EU Roma Framework” as a soft policy is based on two documents: 2011 “EU Framework for National Roma Integration Strategies up to 2020”¹⁹, endorsed by the European Council and the 2013 Council Recommendation “on effective Roma integration measures in the Member States”²⁰ (significantly, the EU’s first legal instrument dealing exclusively with Roma integration). This chapter analyses the explicit and implicit interpretation of the EU Roma Framework as a policy, evaluating its conceptual design with regards to the target group definition (“whom does the EU Roma Framework really serve?”), measures targeting anti-discrimination, and

¹⁵ 2015 Roma Inclusion Index, pg. 19

¹⁶ In Spain, in 2007 14.1 % of entire Roma population was in situation of severe exclusion, in 2014 this proportion has grown to 54.4%. http://www.foessa2014.es/informe/uploaded/documentos_trabajo/15102014151523_8331.pdf (pg.4)

¹⁷ <http://www.dreamdeferred.org.uk/2016/04/fascism-and-the-far-right-in-europe-country-by-country-guide-part-one/>

¹⁸ “The situation of Roma and Travellers in the context of rising extremism, xenophobia and the refugee crisis in Europe”, Congress of Local and Regional Authorities, Council of Europe, <https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&InstranetImage=2947279&SecMode=1&DocId=2385346&Usage=2>

¹⁹ COM(2011)173 on an EU Framework for national Roma integration strategies, Council Conclusions (EPSCO) of 19th May 2011 An EU Framework for National Roma Integration Strategies up to 2020.

²⁰ Council of the European Union (2013). Council Recommendation on effective Roma integration measures in the member states, Employment, Social Policy, Health and Consumer Affairs Council Meeting, Brussels 9 and 10 December 2013. Available at: http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/lsa/139979.pdf

specifically on anti-Gypsyism and the scope of action beyond the four main priority areas: education, employment, healthcare and housing.

Firstly, the imprecise target group definition – the Roma – has led to some conceptual confusion, leading to inconsistencies with regards to the foreseen beneficiaries. The EU Roma Framework, as its very name suggests, aims at targeting the “Europe’s largest minority”²¹. However, the Framework’s explicit focus on “social and economic integration of Roma” (pg.2) positions the framework in the broader strategy of fight against poverty and exclusion. Moreover, the “explicit but not exclusive targeting”²² principle of Roma inclusion adds on to this confusion. Thus, a question arises: does EU Roma Framework target this population as an ethnic minority or as a socio-economic (vulnerable) group?

While the focus of the EU Roma Framework is rather centred on questions of social vulnerability of many Roma in Europe, such policy framing risks ethnicising social problems they face and inevitably reinforces social stigma associated with their ethnic minority status. Even if in some member states Roma are officially recognized as an ethnic group, they are mostly targeted as a vulnerable and marginalised social group. Examples from Czech Republic²³, Slovakia²⁴ and France²⁵ illustrate a whole range of consequences of this incoherence: defining the target group mainly through social criteria (poverty, exclusion, and marginalisation) excludes those better off, while the social stigma invoked by these criteria falls on the entire Roma minority.

In this sense, the way Roma are framed shapes the discourse and narrative on that population. Other examples provided by respondents from Bulgaria, Italy, Romania or Spain indicate that diverse sectors of Roma population are left out as there is absence of an intersectional approach (variables as gender, age, disability, sexual orientation or nationality) in NRIS. In particular, respondents named the following categories: women²⁶, youth²⁷, senior/elders²⁸, immigrant²⁹, educated/ successful individuals³⁰, people with disabilities, LGBTIQ and people in rural communities.

²¹ The term “Roma” is used, following the existing institutional practice within EU institutions and other intergovernmental organisations such as the Council of Europe, as an umbrella term “which includes groups of people who have more or less similar cultural characteristics” <http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:52011DC0173> (pg.2)

²² Principle nr. 3 of the “10 Common Basic Principles of Roma Inclusion”

http://www.coe.int/t/dg4/youth/Source/Resources/Documents/2011_10_Common_Basic_Principles_Roma_Inclusion.pdf

²³ In **Czech Republic**, the Roma are perceived primarily as a socially excluded group (although half of the Roma population does not live in excluded localities), connecting NRIS to social-problem solving and crime prevention. While NRIS measures are meant to also combat discrimination against Roma, the implementation on NRIS falls with the Agency for Social Inclusion, the same one which manages the Strategy for Combatting Social Exclusion. Consequently, in practice both strategies are merged, and the explicit focus on Roma is replaced with the focus on socially excluded groups.

²⁴ In **Slovakia** Roma are a recognized ethnic minority and as such should enjoy a variety of benefits, similar to the treatment received by other minority groups in the country. However, the Roma are *de facto* treated in policy as a vulnerable, marginalized and deprived socio-economic group. While this approach ignores the considerable portion of Roma community that can be considered “integrated” it also fails to account for other, intersectional sources of social exclusion, such as discrimination. Lajčáková J. (2014) “Roma MATRIX Country Report: Slovakia”. Available at: <https://romamatrix.eu/slovakia-country-report>

²⁵ In **France**, the policy measures of NRIS target the entire ethnic group while, in practice, they only refer to those which are in the situation of informal housing (informal, illegal settlements and forced evictions); according to studies – only around 17,000 or 4,25% of the whole Roma population in France. http://www.romadecade.org/cms/upload/file/9773_files_fr_civil-society-monitoring-report_en-1.pdf (pg.6)

²⁶ Although gender was included as a horizontal measure of NRIS, the lack of explicit measures for Roma women has been underlined. Scholars also underline the “vanishing gender awareness” in NRIS. D’Agostino, Serena (2016) “Five Years of EU Roma Integration Policies: Vanishing Gender Awareness?” IES Policy Brief Issue 2016/14

²⁷ Overall, Roma population is relatively young: 35.7% are under 15 compared to 15.7% of the EU population overall and the average age is 25 among Roma, compared with 40 across the EU. Although this is acknowledged in the EU Roma Framework, the youth are not explicitly mentioned as a target group.

²⁸ Explicitly mentioned in most countries as an underserved sector of Roma communities, which faces multiple challenges and is strikingly ignored by policies.

²⁹ A growing sector of Roma population who are poorly or not targeted at all by national strategies in their “host” countries. Some member states took notice of this and included specific measures for immigrant Roma in their strategies, for example in **Spain** (in the operational plan 2014-2016).

³⁰ Educated or successful Roma individuals who are hiding their ethnic background due to deep prejudices, stereotypes and discrimination, by the majority population against Roma. This segment of the group is not targeted at all by the Framework and as a result many Roma feel ashamed to share their ethnic origin, for example when applying for jobs.

Secondly, while the text of the EU Roma Framework begins with the acknowledgement that “Roma in Europe face prejudice, intolerance, discrimination and social exclusion in their daily lives”³¹ (likewise, the 2013 Council Recommendation highlights the need to combat discrimination and prejudice against Roma) – limited emphasis is put on measures targeting anti-discrimination, and specifically anti-Gypsyism. In fact, absence of anti-Gypsyism³² as an issue represents one of the biggest shortcomings of the EU Roma Framework since it was launched back in 2011. This lack of recognition contributed to member states’ reluctance to include specific measures to address anti-discrimination, or more specifically the fight against anti-Gypsyism³³.

Only in 2016 the Commission acknowledged the term ‘anti-Gypsyism’, interpreting it only via its anti-discrimination legislation. Specific examples are the three landmark infringement proceedings³⁴ launched by the EC against the Czech, Slovakian and Hungarian governments over Roma school discrimination. Despite treating anti-discrimination as a horizontal feature, limited impact has been generated. Civil society representatives generally agree that the existing legal framework³⁵ is very important and necessary, however, they emphasise that it is an insufficient tool to effectively combat expressions of anti-Gypsyism. Furthermore, the lack of independent equality and/or human rights bodies or their restricted mandates, as well as limited practice of denouncing and filing (and winning) court cases further weakens progress in this regard. In a nutshell, tackling anti-Gypsyism through current anti-discrimination legislation is not enough – its manifestations, including institutional racism, should also be combated transversally, in the four key areas of NRIS, supplemented by concrete reactive and preventive measures³⁶.

Thirdly, although there is a broad consensus that the four pillars established by the EU Roma Framework - education, employment, healthcare and housing - are the main priorities, the CSOs suggest that the scope of action of the current Framework is incomplete and partial. The responses of the CSOs identified areas of activity which are missing and should be complementary to the four main pillars and thus directly and indirectly contributing to the efforts for Roma inclusion. The following scopes of action have been listed as needed: Roma political participation; Roma arts and culture, identity and history; social justice and justice system; economics, trade, industry and technology; explicit gender-sensitive measures. These thematic areas are seen as compensatory and supplementary, contributing to the effectiveness of NRIS’s implementation and support efforts directed at fighting anti-Gypsyism, as well as compensating for lack of official ethnic minority status in some EU member-states.

1.4 Evaluating the EU instruments of implementation of the EU Roma Framework

The European Commission (EC) has taken a leading role in seeking improvement of its Roma citizens by launching the EU Roma Framework and to this end has made use of existing or especially created instruments supporting its implementation. An initial institutional structure has

³¹ Pg.2

³² “Anti-Gypsyism is the specific racism towards Roma, Sinti, Travellers and others who are stigmatized as ‘gypsies’ in the public imagination”, according to the Alliance against Antigypsyism: http://antigypsyism.eu/?page_id=17

³³ Nonetheless, NRIS in **Bulgaria, Hungary and Spain** include a chapter dealing specifically with anti-discrimination while in **Romania** anti-discrimination is mentioned indirectly. No specific measurable indicators or targets were set (with the exception of **Bulgaria and Hungary**) making it very difficult to measure progress.

³⁴ http://europa.eu/rapid/press-release_MEMO-16-1823_en.htm

³⁵ Such as the Racial Equality Directive (2000/43/EC) or the Council Framework Decision (2008/913/JHA) on combating certain forms and expressions of racism and xenophobia.

³⁶ Reactive measures (such as taking legal stand against cases of discrimination) need to be supplemented by more proactive and preventive measures, including: systemic change of the dominant public narrative and crafting of powerful counter-narratives, shaped by Roma themselves; combating hateful and sensational reporting by fair and unbiased coverage in the media or development of Roma media outlets; inclusion of Roma history, culture and identity in school curricula; providing means for development and promotion of Romani arts and culture can contribute to visualising such counter-narratives.

also been emplaced which oversees the coordination and participation among diverse stakeholders, including governments, European agencies and civil society as well as across different levels of governance. This section aims to assess the available tools the EU has put forward in regard to the implementation of the EU Roma Framework.

In this sense, it is important to acknowledge that the role of the EC in ensuring progress of NRIS is essential. Some respondents commended the EC for its undeniable commitment and strong stance of Commissioners (especially DG Justice Commissioners) in favour of Roma inclusion. Nonetheless, shortcomings were also identified. The respondents recognize that the implementation of the NRIS lies with the member-states and that the scope of competence of the EC is limited when it comes to housing, especially with regards to illegal forced evictions, or education, among other key areas. Nonetheless, the Roma CSOs feel that the EC should have done more to push the member-states to deliver and fulfil their commitments as they are still not held sufficiently accountable.

1.4.1 EU's anti-discrimination legislation

Implementation of the EU Roma Framework should be linked to the question of EU principles on fundamental rights, more specifically on EU anti-discrimination legislation. In other words, fulfilment of commitments with regards to the EU Roma Framework should not rely solely on the socio-economic inclusion approach, but should be assessed from the perspective of compliance with human rights standards in member-states. The EC should be robust in ensuring that the Racial Equality Directive (RED) is not breached in EU countries. In this sense, launching of the three infringement procedures in three Central and Eastern European (CEE) states, in regard to discrimination of Roma in education, is welcomed as a positive development. However, CSOs have reported that the infringement procedures have not yet brought expected results as the unlawful practices of discriminating against Roma children in education continue. Moreover, the Commission should be fair when assessing the proper implementation of the RED by not only going against the CEE governments but also targeting violations in Western countries such as France and Italy. These two countries have been singling out Roma with forced evictions, keeping them in segregated state-sponsored camps (case of Italy) and depriving them of access to housing services, in comparison to any other EU citizens. Evidence of the discrimination in housing that the Roma face daily from the Italian authorities has been brought numerous times by CSOs to the European Commission, however, to date, there has been no infringement procedure launched against this country. Recently another case for breaching the RED has been sent to the Commission against Bulgaria, which disproportionately targets Roma through evictions and demolitions of their homes³⁷.

Another piece of legislation which is relevant for this assessment is the Council Framework Decision³⁸ on combating certain forms and expressions of racism and xenophobia. As of 2016 the EC is able to launch infringement proceedings against member-states which breach this Framework, which is a great tool to combat anti-Gypsyism, anti-Roma rhetoric and violent attacks against Roma, as well as the condoning, denial and gross trivialisation of the genocide against Roma. CSOs are not universally aware of this tool and it needs to be promoted and disseminated among Roma activists, who could bring the necessary evidence to the European Commission if there is a violation of this section of the EU Roma Framework legislation.

1.4.2 Country Specific Recommendations

Embedding the Framework and NRIS in the broader context of mainstream social policies is important for institutional alignment of policies and strategies, maximizing potential efficiency. The country-specific recommendations³⁹ (CSR) are one example. For the 2014-2020 period EU regulations include specific reference on using EU structural funds to address country-specific

³⁷ <https://www.opensocietyfoundations.org/briefing-papers/memorandum-violations-eu-law-and-fundamental-rights-bulgaria-s-discriminatory>

³⁸ <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=URISERV:l33178>

³⁹ http://ec.europa.eu/europe2020/making-it-happen/country-specific-recommendations/index_en.htm

recommendations. The CSR are defined annually, proposed by the Commission and adopted by the Council. In 2015 there were 5 country-specific recommendations explicitly mentioning Roma. All of them address inclusive education in the Czech Republic, Slovakia, Hungary, Romania and Bulgaria. In 2014 there were further country-specific recommendations explicitly mentioning Roma for Hungary (poverty reduction), and Romania and Bulgaria (employment). As there has been a general streamlining, the fact that there are country-specific recommendations explicitly mentioning Roma for all the five new member states with the highest share of Roma people shows a level of commitment of the EU.

However, for the last few years the CSR mainly target education and not other areas of Roma exclusion, such as housing for example. According to civil society representatives, beyond challenges of increasing policy and institutional coherence, member states have not adequately responded to the CSR⁴⁰ on the Roma issues asked by the Commission. As part of the CSR obligations, objectives of NRIS should have been explicitly included in National Reform Programmes within the European Semester but it seems that they are not.

Another major issue regarding the CSR is that this tool is neither clear nor transparent for CSOs. On the one hand, there is lack of clarity for NGOs from the side of the European Commission on how CSR on Roma are decided, which DGs and units are in charge and what are the consequences if CSR are not implemented by member-states. On the other hand, only very few organisations are aware of this tool and lack the necessary knowledge and capacity to engage. This contributes to the insufficient potential of the CSR when it comes to alignment with the implementation of the EU Roma Framework.

1.4.3 Mechanisms of coordination at the EU level

Roma Task Force

The EU Roma Framework and all its surrounding institutional and structural processes is led by the Directorate-General (DG) for Justice, Consumers and Gender Equality (Non-discrimination and Roma Coordination Unit), which holds the mandate to coordinate the work on Roma of other DGs. Nonetheless, it was noted that direct implication of only one DG is not enough – active involvement of other DGs is necessary to maximize the potential of progress of Roma inclusion, guarantee greater internal coherence and exercise more pressure on member-states. To this end, a Roma Task Force – which brings together senior officials from all relevant EC departments – was established in 2010⁴¹. Nonetheless, the work of the Roma Task Force is seen as un-transparent and inaccessible to CSOs – it is unknown which DGs are represented, what is its scope of competencies and influence, and how often or with what purpose it meets.

Furthermore, with regards to internal EU coordination, currently it is not clear which DGs work on what aspect of the EU Roma Framework. Although the competency in key areas of the EU Roma Framework lies with member-states, the corresponding DGs also manage their own initiatives and programmes. It is unclear, however, how or to what extent the relevant DGs such as DG EAC, DG SANCO, DG HOME, DG REGIO incorporate or link commitments of the Framework to their own activities. In other words, what is needed is greater internal coherence and synergy across DGs with regards to the implementation of the Framework, which is transparent to CSOs. Such a synergetic approach to implementation of the EU Roma Framework can become a model for member-states to follow.

Network of National Roma Contact Points (NRCP)

The EU Roma Framework expected that member-states appoint National Roma Contact Points (NRCP) “with the authority to coordinate the development and implementation of the strategy”⁴².

⁴⁰ In fact, the use of CSR as an instrument is little known to Roma civil society respondents, highlighting the need for its greater dissemination and visibility.

⁴¹ http://europa.eu/rapid/press-release_IP-10-1097_en.htm?locale=en

⁴² Pg.9.

As a mechanism of coordination and in order to facilitate dialogue among member-states, the EC established in 2012 a Network of National Roma Contact Points (NRCP) which meets twice a year. Through mutual learning, exchange of experiences and thematic working groups, the NRCP and the EC aim to further coordinate their efforts.

Nonetheless, there is a general lack of knowledge of the progress made by the Network and tangible results with regards to the process of implementation. Transparency of discussions and decisions made in Brussels from the meetings of NRCPs with the Commission remain a great concern of Brussels-based CSOs, which requested more information on this many times but were refused. Furthermore, it is important to emphasize that while the coordination across NRCP is important, it is more urgent to attend the limitations of NRCP in the national contexts. Despite their central role for the process of implementation, NRCP were not adequately designed and staffed to be able to effectively manage NRIS⁴³. NRCP still face important challenges and limitations; such conclusions were voiced in the 2016 Council conclusions⁴⁴ on Accelerating the Process of Roma Integration, European Court of Auditors Report as well as in responses to the questionnaire. A general overview⁴⁵ provides evidence that the NRCP have limited mandates and competencies, also with regards to decision-making and financial allocation, and generally lack capacity of influence and political leverage. They are often un-transparent and inaccessible to Roma civil society or Roma community members beyond a small circle of Roma or pro-Roma organisations. They often lack sufficient budgets and not uncommonly lack trained and knowledgeable staff.

1.4.4 Mechanisms of Roma participation

Despite the EU Roma Framework's commitment to the principle of "Roma participation"⁴⁶, some problematic aspects were highlighted by the Roma civil society respondents. The EU Roma Framework does not provide any specific guidelines how to ensure Roma participation nor foresees mechanisms for enforcing or facilitating it. Respondents held that in consequence "Roma participation" is often superficial, fragmented and partial, tokenistic and symbolic. They are treated as mere consultants with no role in decision-making processes. Stronger presence and involvement of pro-Roma organisations and academic experts in decision-making on Roma, in comparison to lesser Roma involvement, reinforces the belief that Roma participation is more as a window dressing than real. The Roma CSOs expect, however, that among the plethora of stakeholders, including pro-Roma civil society and experts, their expertise and voice must be recognized and heard.

When it comes to Roma participation, there are different spaces within which the EC interacts and consults with CSOs, and especially Roma organisations. Such instruments available at EU level are: 1) the consultation meeting with EU umbrella Roma and pro-Roma civil society and international organisations in Brussels, 2) the EU Roma platform, and 3) the EU Roma Summits. One major trend in all these tools for participation is the challenge to include the most representative but also legitimate Roma CSOs in the process of decision-making.

⁴³ The 2013 Council Recommendation acknowledged the limited capacity and mandate of NRCP and recommended member states that they provide them "with adequate mandate and resources appropriate to their role" (point 3.8) and involve them in "decision-making processes regarding the development, funding and implementation of relevant policies" (point 3.9).

⁴⁴ <http://data.consilium.europa.eu/doc/document/ST-15406-2016-INIT/en/pdf>

⁴⁵ Detailed and very specific examples on the functioning of NRCP were provided in 8 of the 9 selected countries, namely: **France, Slovakia, the UK, Spain, Bulgaria, Romania, Czech Republic, Italy.**

⁴⁶ "Roma participation" had become one of the principles *sine qua non* of Roma policy-making already well before the EU Roma Framework. The OSCE was first in defining the importance of direct Roma involvement, through the motto of "For Roma, with Roma" of the 2003 OSCE Action Plan. The EU embraced this principle, laid out in the "10 Common Basic Principles of Roma Inclusion" (principle 9 "Involvement of civil society" and principle 10 "Active participation of the Roma"), which became an important component of the EU Roma Framework and of the overall policy-making on Roma issues.

The consultation meetings in Brussels

As a space for periodic consultation meetings between the EC, the CSOs and other stakeholders, the Commission organizes meetings twice a year for Brussels-based organisations. These events aim to inform CSOs and partners about the policy process on Roma inclusion in regard to the EU Roma Framework, Platform events, reporting tools and other relevant matters from the side of the Commission. The consultation meeting is well appreciated and needed according to CSOs, however, it has certain limitations and needs improvement. CSOs have reported that it is mostly in a format of one-sided information sharing from the EC towards the rest of the invited stakeholders. An important aspect is that the information shared during these meetings is limited and notes after each event have not been readily available. However, there is some progress on this issue - after the January 2017 consultation the EC sent notes from the meeting to all invited parties. It is important that this practice continue in order to ensure trust between CSOs and the EC services in charge of Roma inclusion.

However, CSOs have also emphasized that these consultation meetings cannot legitimize the decisions on behalf of Roma since the most representative and legitimate Roma CSOs voices from the ground are not taken into account. During the last consultation the EC clarified that the regular consultation process with the Commission involves only the EU umbrella NGOs. There is a major issue here, since, practically, there are only two EU Roma umbrella organisations and thus it cannot be ensured that the most representative and legitimate Roma CSOs voices are being heard. Currently the EC does not have clear conditions on who participates, and on what basis organisations are selected (representativeness, knowledge or specific expertise), which questions the legitimization of the decisions-taken during these meetings.

The EU Roma Platform

The EU Roma Platform was first established in 2009, following the General Affairs Council conclusions of 8 December 2008⁴⁷; since then, 10 EU Roma Platform meetings have taken place. Its creation is a crucial initiative to keep track of the progress of Roma inclusion and to enable all stakeholders to have an equal say. In relation to the organisation of the Platform event, the European Commission has tried through its consultation meetings to consult with CSOs and ensure Roma participation in terms of speakers and participants; exemplified by the last Roma Platform in November 2016. Nonetheless, despite these positive aspects, several shortcomings were identified in the process of organisation, content and outcome of the event. Currently, the Platform is a venue dominated by the EC in which governments self-applaud their often-dubious successful measures, leaving limited space for Roma organisations to voice their concerns⁴⁸.

These challenges seriously undermined the credibility of the Platform and decreased the legitimacy of all pro-Roma decisions regarding legislation, policies, funding and practices at the EU level. As a result of this, a number of major NGOs decided not to attend the last Platform event. Following this, more than 200 CSOs called on the EC to reform the Platform in order to improve the quality of the consultation and future Platform events with the European Commission, in an effort to increase cooperation by involving Roma with regards to planning, monitoring and reviewing of policies, projects and practices that affect them.

Furthermore, the EU Roma Platform is disconnected from national and local realities and as mentioned in an earlier section, it is not inclusive of the most representative and legitimate national and local Roma organisations which have knowledge regarding the challenges and

⁴⁷ General Affairs Council Conclusions 15976/1/08 REV 1.

⁴⁸ For example, Acton and Ryder note that “there have been growing complaints that the Roma Platforms are dominated by the European Commission, are hierarchical and tightly controlled leaving little space for Roma civil society to express its aspirations, report on progress in their home countries and, where needed, articulate frustrations (Rostas and Ryder, 2012)” (Acton and Ryder 2013).

successes of Roma inclusion. The most recent EU Roma Platform from 2016 only reinforced this criticism⁴⁹.

The EU Roma Summits

The EU Roma Summits⁵⁰ (first one organised in 2008) provide a unique opportunity for positioning the issue of Roma inclusion high on political agendas. The last summit was organised in 2014 with the topic 'Going local on Roma inclusion'. President Barroso emphasised during the meeting that the EC has put in place three strong pillars for Roma integration - policy, legislative and funding – claiming a major achievement on Roma inclusion in the EU. Nonetheless, the CSOs highlight that this space should be more inclusive of Roma representatives in decision-making in relation to the organisation and the speakers for the event⁵¹. NGOs have also pointed out that these meetings are dominated and shaped by non-Roma stakeholders.

1.4.5 EU Funding

Broadly speaking, lack of funds for implementation is not a problem in the case of the EU Roma Framework. Rather, accessing funds, their adequate allocation and proper investment which shows positive results, as well as monitoring and evaluation, remain an important challenge.

Member-states largely rely on European funding in the implementation of NRIS; at the same time, countries do not publicly declare what amounts from national budgets are available for NRIS⁵² making it difficult to monitor national investment. During the 2007-2013 financial period, use of EU funds for Roma inclusion was limited⁵³; the absorption was especially low in Central and Eastern European countries⁵⁴. An effort was made to address previous deficiencies in order to maximize the use of EU funds for implementation of NRIS for the 2014-2020 programming period. The Country-Specific Recommendations (CSR)⁵⁵ under the European Semester provided guidelines to member-states in identifying funding priorities. The introduction of *ex ante* conditionalities⁵⁶ proved to be the main innovation which improved the absorption of EU funds.

Nonetheless, in terms of EU Funding it is not clear how the EU Roma Framework has been linked with the ongoing multi-annual funding framework 2014-2020. Thus, a stronger linkage between policy priorities of the future EU Roma Framework and multi-annual funding framework (MFF) in the 2020-2027 programming period should be a priority to ensure better absorption and use of funds for implementation purposes. If that is not ensured, there is a great risk that any future Roma policy would fail to achieve its goals and objectives. The proposal for the next MFF is currently being prepared by the EC, which will be sent to the Parliament and Council for discussions and approval by the end of 2017. If the EU is serious about continuing its efforts to close the gap between Roma and non-Roma in all areas of life, it is essential that Roma is prioritised in the next MFF.

⁴⁹ <http://www.errc.org/blog/ten-eu-roma-platforms-later-and-still-no-results/145> or <https://zmk.blogactiv.eu/2016/12/02/roma-platform-mixed-responsibility-or-missed-opportunity/>

⁵⁰ http://ec.europa.eu/justice/events/roma-summit-2014/index_en.htm

⁵¹ For example, following the last EU Roma Summit which took place in Brussels in 2014, the European Roma Grassroots Organisation (ERGO) has denounced lack of Romani involvement arguing that “this high political event, however, is not organised with neither for Roma”. <http://www.ergonet.org/ergo-network/news/129/000000/European-Roma-Summit/>

⁵² This is problematic – potential withdrawal or reduction of EU funds in the next programming period will surely translate into cuts in NRIS expenditure. Over-reliance on EU funds also leads to halts in implementation of measures during transfer periods and hinders sustainability of undertaken actions.

⁵³ European Commission, *Report on the Implementation of the EU Framework for National Roma Integration Strategies* (Brussels: EU, 2014), 3, http://ec.europa.eu/justice/discrimination/files/roma_implement_strategies2014_en.pdf (pg.10)

⁵⁴ http://ec.europa.eu/justice/discrimination/files/roma_toolkit2014_20_en.pdf

⁵⁵ According to the 2016 European Court of Auditors Report, country-specific recommendations “are recommendations relating to structural challenges which it is appropriate to address through multiannual investments that fall directly within the scope of the ESI Funds as set out in the fund-specific regulations.” Since 2012, the EC issued CSRs on Roma inclusion in Bulgaria, Hungary, Slovakia, Czech Republic and Romania obliging them to provide specific funding for Roma. The topics to be addressed referred to Roma integration in general, education, poverty reduction and employment.

⁵⁶ Investment priorities 9 (ii) and 9 (iii), the setting up of the code of conduct on partnership and the introduction of common indicators relevant to Roma integration programmes.

Monitoring of EU funds spent on Roma inclusion in member-states for Roma inclusion is not possible. There are several main reasons given by the European Court of Auditors (the Court).⁵⁷ Firstly, the EU Framework and the NRIS do not indicate what level of funding is needed to carry out the proposed measures for Roma inclusion. Secondly, monitoring the progress made by Roma integration projects is difficult because of a lack of data on Roma participants. And thirdly, governments do not record amounts channelled specifically to Roma inclusion. According to the Court “around 1.5 billion euros has been earmarked for the socio-economic integration of marginalised communities such as Roma during the 2014-2020 programme period”.⁵⁸ Most investment is allocated for education and housing (infrastructure) (in terms of national public funding) and employment (through ESI); much less spending goes to the area of health and to funding horizontal and structural measures.⁵⁹ According to the Court, measures to address anti-Gypsyism received even less attention, a view that is strongly supported by Roma civil society. Furthermore, Roma representatives point to several problematic issues and practices related to financial investment. The principle of “explicit but not exclusive targeting” of NRIS opens a gateway for member states to implement actions which have no impact in Roma communities but which, nonetheless, justify the use of funding under the NRIS commitments (for example, reportedly building a parking lot or renovating municipal parks or city squares).⁶⁰ There are also instances of misuse of EU funds that in fact perpetuate patterns of social exclusion of Roma, such as funding segregated housing for Roma in the Czech Republic, Slovakia or Italy⁶¹. Furthermore, Roma CSOs stress that the financial investments seldom reach their beneficiaries: a significant percentage of expenditure covers salaries and staff⁶² and considerable sums are consumed by mediating institutions.⁶³ An increasing number of new actors and development agencies are attracted to the field of Roma inclusion: they often lack previous experience and expertise in working with Roma, however, they are more professional and successful in obtaining grants.⁶⁴ The growth or expansion of a “pro-Roma microcosm” weakens less-skilled and competitive Roma civil society, especially at a local or grassroots level.⁶⁵

1.4.6 Monitoring and Evaluation

The EU Roma Framework foresaw the establishment of “a robust monitoring system (...) with clear benchmarks which will ensure that tangible results are measured”.⁶⁶ The EC reports annually to the European Parliament and the Council on progress made based on information provided by the member states and data gathered periodically by European agencies, most notably by the Fundamental Rights Agency (FRA). The 2013 Council Recommendation further instructed member states to monitor effectiveness “by setting baselines or measurable targets or by collecting relevant qualitative and quantitative data”.⁶⁷ This process is facilitated by the development of “Roma

⁵⁷ http://www.eca.europa.eu/Lists/ECADocuments/SR16_14/SR_ROMA_EN.pdf

⁵⁸ Ibid. (pg.8)

⁵⁹ EC 2016 Report on Implementation of NRIS.

⁶⁰ <http://www.erc.org/roma-rights-journal/roma-rights-2011-funding-roma-rights-challenges-and-prospects/4062/1>

⁶¹ Further examples of irregularities, misuse of funds or inappropriate expenditure have been evidenced in **Bulgaria, Hungary, Romania, Slovakia** and **Italy**. “Main risks of misusing EU funding in the field of Roma inclusion” OSF Report (Mtm).

⁶² For example, in **Spain**, a report argues that the Roma Development Plan (predecessor of Spanish NRIS) spent 75% of the overall investment on staff; traces of similar practice under the framework of NRIS have been signalled although specific data is largely missing. http://federacionkamira.es/wp-content/uploads/2015/11/Report_EvaluationRomaPolicy_Spain.pdf

⁶³ <http://www.eurasia.undp.org/content/dam/rbec/docs/Have-Roma-in-Slovakia-benefitted-from-the-European-Social-Fund.pdf>

⁶⁴ A study conducted by UNDP on the use of the European Social Fund in Slovakia, for example, found that an increasing number of organisations, with no previous experience in working with Roma, specialize in writing projects and often become implementing entities. Their involvement is “often accompanied by a suspicion that the mediating site, frequently associated with powerful non-Roma mediating institutions, are benefiting from the projects more than the local Roma”. <http://www.eurasia.undp.org/content/dam/rbec/docs/Have-Roma-in-Slovakia-benefitted-from-the-European-Social-Fund.pdf> (pg.72)

⁶⁵ D’Agostino, Serena. 2014. The Missing Piece: Empowerment of Roma Grassroots Organisations in EU Roma Integration Policies. Policy Brief. http://www.ies.be/files/PB_2014_10_o.pdf ; Kóczé, Angela, and Marton Rövid. 2012. “Pro-Roma Global Civil Society: Acting For, with or instead of Roma?” In *Global Civil Society 2012: Ten Years of Critical Reflection*, edited by Mary Kaldor, 248. Palgrave Macmillan.

⁶⁶ <http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:52011DC0173> (pg.13)

⁶⁷ [http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%03A32013H1224\(01\)](http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%03A32013H1224(01)) (Article 3.4)

integration indicators” and a reporting template by FRA. Regardless of emphasis on monitoring and evaluation, the 2016 EC Roma Report argues that “further efforts are necessary to enable an assessment of the results of the reported targeted and mainstream measures on Roma”.⁶⁸ Although a common detailed reporting template was developed, in 2016 not all the countries have used it while some countries did not report to EC at all.⁶⁹ Moreover, the template was developed in such a way that restricted most of the CSOs who were not able to use it and thus have not channelled information to the EC in regard to their analysis on the progress made on the Framework for 2016.

In addition, there are issues surrounding quality and effectiveness of the monitoring and evaluation of the EU Roma Framework. First of all, the **lack of reliable data, including data on ethnicity**, was highlighted as a main weakness not only of monitoring and evaluation, but also of the very policy design.⁷⁰ Secondly, the monitoring and evaluation mechanisms proposed by the EC and the Council need greater emphasis on **outcome and impact**. Quantitative (for example, “number of beneficiaries”) and financial data (expenditure) proves largely insufficient to provide a more comprehensive picture of the results of the implemented measures. Thirdly, the emphasis on self-reporting by member states is inherently flawed.⁷¹ Currently, the monitoring and evaluation mechanisms do not include regular independent and external evaluations based on participatory methodologies and done by mixed teams of evaluators, including Roma.

Furthermore, at national level, the lack of transparency and access to data makes it difficult to engage in shadow reporting – for example, the annual reports on implementation prepared by member states for the EC are not made public. It was emphasized that in preparing monitoring reports it is absolutely necessary that the EC diversifies its source of information (for example, by including input from shadow reports prepared by CSOs and other stakeholders), and the same principle should be applied by member states in preparing their reports for the EC. Regrettably, there is no specific budget put aside by the Commission on a yearly basis up to 2020, neither for external monitoring and evaluations nor for shadow reporting, especially for Roma civil society. Moreover, Roma civil society representatives do not have sufficient opportunities to effectively contribute to the process of monitoring and evaluation – they are rarely part of monitoring committees, lack access to basic documents regarding implementation and are seldom consulted regarding the impact on the ground. One way to address this gap is to ensure that the Pilot project⁷² “Capacity-building for Roma civil society and strengthening its involvement in the monitoring of National Roma Integration Strategies” becomes a core programme of the European Commission. At the time of writing, it was not clear when and how this project will be implemented by the DG for Justice and Consumers.

⁶⁸ http://ec.europa.eu/justice/discrimination/files/roma-report-2016_en.pdf (pg.14)

⁶⁹ http://ec.europa.eu/justice/discrimination/files/roma-report-2016_en.pdf

⁷⁰ A similar observation was made in the 2016 European Court of Auditors Report, 2015 Study for the LIBE Committee, 2015 Roma Inclusion Index as well as numerous times by the Fundamental Rights Agency (FRA) and the UNDP. The CSOs also underlined this issue in the questionnaires.

⁷¹ A 2011 OSEPI Policy Paper “EU Policies for Roma” has already pointed this out: “if the same body implements, monitors and develops policy; poor policy implementation is likely to result”. <https://www.opensocietyfoundations.org/sites/default/files/2011-07%2520EU%2520Roma%2520Inclusion%2520Policies%2520final.pdf>

⁷² http://www.infoeuropa.eu/rocid.pt/files/database/000066001-000067000/000066258_2.pdf

PART 2: EXAMINING THE NATIONAL ROMA INTEGRATION STRATEGIES IN SELECTED COUNTRIES: A BRIEF OVERVIEW

2.1 Evaluating progress: Implementation of NRIS

The EU Roma Framework represents a strategic political instrument which mobilised member states to adopt or further develop comprehensive action plans aimed at improving the overall situation of their Roma citizens. Nonetheless, the single EU Roma Framework was transposed into 27 different action plans or measures, representing a plethora of diverse approaches and policy solutions towards complying with the EC's guidelines.⁷³ The language and the non-binding nature of the EU Roma Framework, the diverse institutional make-up as well as histories of policy treatment of Roma in each country, resulted in very different strategies and actions being adopted across Europe.

In fact, some member states have not adopted an NRIS at all, as in the case of the UK⁷³ and France.⁷⁴ Furthermore, the member states approach the very issue of Roma integration differently, due in part to the discrepant status of ethnic minorities across EU member states. Generally, however, the Framework assumes the approach of socio-economic integration, treating the Roma as a socially vulnerable group, defined by criteria of poverty, social exclusion and marginalization.⁷⁵ Nonetheless, it should be noted that Roma are officially recognized as an ethnic minority in Slovakia, Romania, Hungary, the Czech Republic and the UK, and thus, at least in principle, they are embraced by national legal frameworks concerning minorities. In these cases, however, limited coherence and synergy are evident between the NRIS and national minority-rights provisions. For example, only in the Czech Republic, Romania and Spain do the NRIS include specific mentions of measures in the area of culture. These examples, among numerous others, reflect the direct consequences of the deficiencies of the Framework's policy design.

Since the focus of this report is the overview of the EU Roma Framework, this section of the report aims to provide a brief overview of the progress made in the selected nine countries, pointing to the most important highlights and trends with regards to the process of NRIS implementation between 2011-2016.⁷⁶

2.2 Anti-discrimination

Based on available data, scant progress can be reported with regards to combating discrimination against Roma. In fact, due to intensification of anti-Gypsyism, Roma continue to face discrimination and are increasingly victims of hate crimes and hate speech.⁷⁷ At the same time, instances of institutional discrimination prevail: for example, despite the three infringement proceedings taken forward by the Commission, Roma children continue to be placed in segregated schools and classes and taught with reduced curriculum in comparison to other children.⁷⁸

⁷³ The UK initially proposed the so-called "28 commitments" - an integrated set of policy measures developed to meet the goals of Roma integration.

⁷⁴ The monitoring report on France points to the non-existence of a proper NRIS - rather, the commitment has been reduced to a simple circular (*circulaire* of 26th August 2012) on eviction of illegal camps. France's strategy has been widely criticized by Roma civil society for being "couched in terms that are not explicitly those of inclusion, but of prioritising evictions from illegal settlements". http://www.romadecade.org/cms/upload/file/9773_file5_fr_civil-society-monitoring-report_en-1.pdf (pg. 7)

⁷⁵ According to the responses from the Roma civil society representatives, the target group of the NRIS - the Roma - are framed as a socially vulnerable group rather than an ethnic minority in **Romania, Bulgaria, Slovakia, the Czech Republic, Italy, France and Spain**.

⁷⁶ These findings draw from a more extensive background report prepared in the framework of this research project. The background report which includes more detailed and country-specific findings is available upon request.

⁷⁷ "Comprehensive study of the Special Rapporteur on minority issues on the human rights situation of Roma worldwide, with a particular focus on the phenomenon of anti-Gypsyism", 2015:

<http://www.ohchr.org/EN/Issues/Minorities/SRMinorities/Pages/GlobalStudyonRomaworldwide.aspx>

⁷⁸ <http://www.romea.cz/en/features-and-commentary/is-impunity-ending-for-ethnic-discrimination-in-the-czech-schools>

The 2016 EC Report on the Implementation of NRIS also highlights that “no real improvements can be seen on the ground”.⁷⁹ A year earlier the EC reported that in the old (members from before 2004) EU countries “heated debates on free movement and social rights contributed to negative stereotyping of Roma. In several member states majorities hold unfavourable views of Roma (Italy: 85%, France: 66%, United Kingdom: 50%)”.⁸⁰ A similar trend is reported in CEE countries: for example, the 2014 FRA report argues that the majority of Roma (54%) feel discriminated against when looking for paid work; in the Czech Republic, this percentage reaches 74%. For Italy, France or Poland it is between 64 and 68%.⁸¹ The most recent data (2015 Eurobarometer survey⁸² and the FRA EU-MIDIS II Report on Roma⁸³) highlight that discrimination against Roma prevails: on average, 41% of Roma felt discriminated against because of their ethnic origin while on average only 12% have reported their experiences of discrimination to a corresponding authority.⁸⁴

2.3 Education

Education receives most consideration by member states in their NRIS, recognizing the importance of targeted action from an early age – hence, the increasing proliferation of measures targeting early education.⁸⁵ Despite considerable attention and investment, the progress made is modest. Overall data for Decade countries between 2005 and 2014 suggest that there has been a slight improvement in the situation of Roma in preschool, primary and secondary education (especially enrolment) and with regards to literacy. For example, in Hungary and Slovakia the preschool attendance rate of Roma children has increased since 2005 (Hungary: 42% in 2005 to 70% in 2014; Slovakia: 61% in 2005 to 81% in 2014).⁸⁶ Since 2011, there has been a slight increase in enrolment rates in compulsory schooling in most countries (with the exception of Romania and Slovakia).⁸⁷ Despite some modest progress, in other aspects the situation continues to be problematic or has deteriorated in the last few years. Most importantly, school segregation of Roma children continues to be high: 20% in Hungary, 26% in Bulgaria, 27% in Romania, 40% in the Czech Republic and 51% in Slovakia.⁸⁸ The launching of infringement procedures by the EC in Slovakia, the Czech Republic and Hungary are a breakthrough, though it has not yet produced substantial change. Furthermore, the gap in tertiary education increased although the number of Roma university students has increased. Also of concern is the increase in over-representation of Roma pupils in special schools since 2005 in countries such as the Czech Republic and Slovakia.⁸⁹

2.4 Healthcare

Healthcare continues to represent an enduring challenge, both in terms of improving health indicators among Roma as well as access to healthcare services. Lack of health insurance continues to be one root of the problem, especially in Romania and Bulgaria where approximately half of the Roma population have no access to health insurance.⁹⁰ Furthermore, the child mortality rate remains high: for example, in Spain between 2005 and 2015 it increased from 4.9 % to 7.7 %, almost three times higher than non-Roma.⁹¹ It was underlined that a holistic, more integrated approach to health is necessary in NRIS, recognizing the link between healthcare and housing, employment and education; nonetheless, it was reported that NRIS mostly concentrate on measures directed at improving access to healthcare. Despite the prevailing challenges, several positive initiatives were

⁷⁹ http://ec.europa.eu/justice/discrimination/files/roma-report-2016_en.pdf (pg.8)

⁸⁰ http://ec.europa.eu/justice/discrimination/files/roma_communication2015_en.pdf

⁸¹ Roma survey — Data in focus: Poverty and Employment: the situation of Roma in 11 EU Member States, FRA, 2014.

⁸² Special Eurobarometer 437, 2015.

⁸³ “Second European Union Minorities and Discrimination Survey (EU-MIDIS II) Roma – Selected findings”, FRA, 2016.

⁸⁴ Ibid. Pg 36.

⁸⁵ http://ec.europa.eu/justice/discrimination/files/roma-report-2016_en.pdf

⁸⁶ Roma Inclusion Index 2015.

⁸⁷ “Second European Union Minorities and Discrimination Survey (EU-MIDIS II) Roma – Selected findings”, FRA, 2016, pg. 24.

⁸⁸ Roma Inclusion Index 2015.

⁸⁹ Ibid.

⁹⁰ Ibid.

⁹¹ Ibid.

highlighted. In Slovakia, France⁹² and Bulgaria,⁹³ the Roma health mediators were mentioned as one of the few successfully implemented measures.

2.5 Employment

Employment is the area which is directly dependent on the general economic situation in each country. The economic crisis and recession affected Roma to a greater extent than non-Roma, while a relative improvement is due to the end of recession rather than a consequence of NRIS. Nonetheless, according to the 2016 EC Report and in comparison to 2011 data,⁹⁴ and also input from Roma civil society, scarce progress can be reported in the field of employment. Roma participation in the labour market continues to be very weak while mainstream measures are insufficient to provide substantial progress: only 25% of Roma aged 16 years or older declare themselves employed or self-employed, in contrast to the majority population rate of 64%.⁹⁵ It is important to highlight that the unemployment rate among Roma has increased in many countries between 2005 and 2014. For example, in Bulgaria it increased from 24% in 2005 to 43% in 2014 and in Hungary from 12% in 2005 to 30% in 2014. Data is contradictory for Romania – while between 2005 and 2014 the employment rate of Roma decreased from 46% to 30%, the unemployment rate also decreased from 44% to 33%.⁹⁶ Low levels of education as well as persistent discrimination further contribute to the exclusion of Roma from the labour market.

2.6 Housing

Access to decent housing remains a major problem while the most severe challenges with regards to housing – preventing segregation and forced evictions – prevail. Regretfully, bad practice in using EU funds to provide housing infrastructure to most marginalised Roma in the form of segregated housing continues. According to Roma civil society, in the Czech Republic the number of socially excluded localities almost doubled over the past 10 years. Furthermore, lack of property documents is very high and increasing (only 20% of Roma hold them).⁹⁷ In Bulgaria, around 50% of Roma live in segregated neighbourhoods⁹⁸ and many Roma are at risk of being evicted by the authorities as research has shown.⁹⁹

Geographically segregated Roma communities lack access to public utilities, reinforcing their social exclusion, as reported in Romania. In Italy, housing is among the most deeply-felt and problematic issues and according to CSOs, no adequate responses were designed to overcome this situation and forced evictions and segregated housing prevail.¹⁰⁰ In France, controversies around forced evictions of Roma, many of them EU-citizens, have been continuing for many years. In 2013, France evicted a record 19,380 Roma from camps.¹⁰¹ In a recent report, during the first quarter of 2016, 3,683 people were forcibly evicted by local authorities from 25 living areas and a “significant increase of evictions based on a notice on grounds of safety risks or health hazards adopted by municipalities has been observed”.¹⁰² In most cases, the Roma were not provided with alternative housing.

⁹² In 2016, the programme had 14 mediators in 12 associations.

⁹³ Since 2012 the number of health mediators (HMs) has been constantly increasing (2012 – 106 people, 2013 – 130, 2014 – 150, 2015 – 170, 2016 – 195, 2017 – 220).

⁹⁴ “Second European Union Minorities and Discrimination Survey (EU-MIDIS II) Roma – Selected findings”, FRA, 2016

⁹⁵ Ibid. Pg. 17.

⁹⁶ Ibid.

⁹⁷ Ibid.

⁹⁸ Ibid.

⁹⁹ <https://www.opensocietyfoundations.org/sites/default/files/bulgaria-roma-infringement-memo-20170214pdf.pdf>

¹⁰⁰ It was underlined that in the Italian context the degree of decentralization and certain autonomy of local authorities allows for discriminatory practices to continue. Furthermore, it should be underlined that the authorised, segregated settlements for Sinti and Roma communities represent a parallel housing scheme, rather than part of the social housing system. According to Amnesty International report, over 40,000 Roma live in camps; many of those communities have experienced forced evictions. For example, between 2013-2015 there were 168 forced evictions of Roma in Rome alone.

<https://www.amnesty.org/en/latest/campaigns/2016/04/roma-on-the-margins-housing-rights-denied/>

¹⁰¹ <http://america.aljazeera.com/articles/2014/6/17/roma-attack-franceviolence.html>

¹⁰² <http://www.errc.org/cms/upload/file/france-census-of-forced-evictions-1st-quarter-11-april-2016.pdf>

PART 3: RECOMMENDATIONS FOR EU ROMA FRAMEWORK REFORM POST-2020

Through the CSO responses to the questionnaire as well as available data, several major weaknesses and shortcomings of the current EU Roma Framework were identified. Roma respondents also suggested areas of improvement which would maximize the chances of successful implementation of the EU Roma Framework up to 2020 and beyond, and consequently foster greater impact on the ground. These recommendations have been grouped thematically and are listed and briefly described in this section of the report. The detailed list of concrete recommendations is attached to this report as Annex 1.

3.1 Raising the profile of the EU Roma Framework - towards a binding approach

As a “soft” policy tool, the Framework’s major weakness is its lack of traction – the political commitments it details represent a list of good intentions rather than a set of binding obligations. Consequently, member states can effectively avoid fulfilling their duties with regards to Roma inclusion. In order to move from rhetoric to action it is necessary to raise the profile of the EU Roma Framework towards a more binding approach. The European Commission and the Council should review the viability of mandatory adoption of national strategies. The text of the EU Roma Framework itself should be reviewed in order to make the language more assertive, firm and unequivocal.

Furthermore, it is important to review available instruments and mechanisms which can be used in case of non-compliance of member states. The launching of infringements procedures is welcomed as a positive practice which should be expanded to other areas and countries. European institutions, including the Council and the European Parliament, and especially the European Commission should be stronger and more forceful in exerting pressure on member states to better deliver on their commitments. The EC needs to align its available instruments, such as the Country Specific Recommendations with the EU Roma Framework, as well as make transparent the work and results of the Network of National Roma Contact Points and the Roma Task Force, and ensure better synergies among DGs.

3.2 Coherent Policy Design

Due to discrepancies between the focus of the EU Roma Framework and the NRIS adopted in member states, as well as between the level of policy design and implementation, it is necessary to review and re-assess the framework’s design, in order to contribute to a more coherent and evidence-based policy. The EC should consider re-assessing the framing of the target group – the Roma – ensuring balance between approaching Roma as an ethnic minority and as a socially vulnerable group. In this, the EC should be mindful of internal heterogeneity of Roma communities by adopting intersectional approaches and ensuring that no sector of Roma population is left outside of the scope of the EU Roma Framework (e.g. women, youth, elders, educated and successful individuals). Likewise, additional areas of action should be defined as complementary to the existing four pillars (education, employment, housing and healthcare). Finally, the EC should be more insistent regarding designing NRIS based on reliable data and evidence. Detailed and realistic action-plans should be provided with an adequate and pre-defined budget. It is also important to ensure a more holistic, multi-sectorial and integrated approach to identified problems. For this to be effective, mechanisms of coordination should be improved across all levels of the EU institutions, all relevant ministries and across diverse stakeholders, including Roma CSOs. The EU Framework should also be embedded and linked with mainstream policies, improving institutional alignment and synergy across policies, not only in member states but also at EU level.

3.3 Centrality of anti-Gypsyism

A consensus is gaining ground among key stakeholders, including Roma civil society, that inclusion and integration approaches alone will not succeed in producing substantial change in the lives of European Roma. Existing anti-discrimination legislation provides insufficient tools to effectively counter anti-Gypsyism. Real socio-economic inclusion will not crystalize unless the deeply rooted racism in European societies and institutions is addressed. For this reason, it is necessary that besides existing anti-discrimination legislation which should be firmly enforced, the EU Roma Framework needs to explicitly include the fight against anti-Gypsyism among the key priority areas.

Manifestations of anti-Gypsyism, including institutional racism, should be combated transversally, in the four key areas of the Framework and NRIS while specific reactive and preventive measures aimed at tackling anti-Gypsyism should also be designed. Inclusion and implementation of such measures should be made obligatory and a separate budget should be assigned to this end. Recognition, operationalization (also in courts) and application of anti-Gypsyism as a specific form of racism should be promoted, both on the EU level as well as in national settings. Finally, it is urgent to foster and fund innovative strategies aimed at changing public discourse on Roma as well as at re-educating majorities.

3.4 Stronger role and participation of Roma

Due to the lack of guidelines in the Framework about Roma participation, Roma often feel themselves to be “objects” of policies rather than active agents or equal stakeholders. It is essential to ensure meaningful, informed, independent and quality participation of Roma in decision-making in regard to the NRIS and the Framework. The European Commission needs to ensure the participation of the most representative and legitimate Roma CSOs in the policy process, especially in design, implementation and monitoring, including a degree of decision-making power, on an EU level and in national contexts in regard to the EU Framework and NRIS. The available instruments for Roma participation such as the consultation meetings, the EU Roma Platform and Summit events need to be seriously improved with the support and advice of Roma CSOs.

Much more should be done to secure the development of independent Roma organisations, capable of effective lobbying, fostering political commitment and keeping the member states accountable. To this end, the EC should provide specific guidelines as well as require introduction of concrete measures which guarantee quality participation, including capacity-building and training of Roma CSOs; for their implementation, core funding should be assigned. Roma consultative bodies on all levels, including National Roma Platforms, should be empowered by increasing their scope of competencies and responsibilities.

3.5 Importance of adequate monitoring and evaluation system

Despite the calls for a “robust monitoring system”, the mechanisms of monitoring and evaluation of the NRIS remain weak. Lack of reliable data disaggregated by ethnicity paired with lack of transparency and accountability mechanisms are the main flaws which make the process of monitoring and evaluation difficult and unreliable. For this reason, the EC should promote collecting data, including data on ethnicity and should continue systematically involving other EU agencies in completing and contrasting data. It is essential to ensure regular independent and external evaluations, based on participatory methodologies including Roma community members. Such evaluation should be impact-oriented and should serve as a comparison to the data reported by member states. Member states as well as the EC in its yearly assessments should aim to diversify the source of information used, and especially rely on shadow reporting and external evaluations provided by CSOs, for which specific budgets should be foreseen. Furthermore, mechanisms should be introduced which ensure transparency and access to relevant data, not only in national contexts

but also with regards to the EU. Finally, CSOs, and especially Roma CSOs, should be more actively involved in the processes of monitoring and evaluation at all levels.

3.6 Securing Political Commitment

Ensuring political commitment and political will for the implementation of NRIS among member states remains a challenge. The tendency towards declining political support is likely to strengthen in the near future. The multiple crises and the growing popularity of anti-Roma sentiment across Europe since 2011 have negatively affected the implementation of NRIS and led to gradual deprioritising of Roma-inclusion efforts, especially on local and regional levels. Reversing these trends will remain a central strategic objective for European institutions as well as for Roma advocacy groups. A major mobilisation of key stakeholders, including upcoming EU presidencies, is needed to secure political commitment for the EU Roma Framework up to 2020 and beyond.

European institutions should direct efforts in this direction, in synergy and close cooperation with other intergovernmental organisations, including the Council of Europe and the OSCE. In the framework of its own work, the EU should strengthen links between the EU Roma Framework's priorities and the broader EU agenda, including funding priorities. In national settings, it is especially important to reinforce national Roma CSOs in order to facilitate national-level advocacy.

3.7 Assuring funding

Funding is one of the main incentives motivating member states to invest in Roma inclusion. The links between EU political and financial priorities and the EU Roma Framework should be further strengthened. More importantly, the next multi-annual financial framework (MFF) should be connected to the policy priorities of the future EU Roma Framework. The use of instruments such as Country-Specific Recommendations (CSR) under the European Semester proved to be effective – this practice should be extended to all EU member states. The EC should strengthen its monitoring mechanisms to make sure that the funds are adequately spent, and not misused to perpetuate situations of exclusion (for example, through segregated housing) and invested to produce a positive impact in Roma communities. Furthermore, the EC should consider direct investment in member states through its own programmes and initiatives; such direct implementation via corresponding DGs should be complementary to member-state efforts.

THE EU ROMA FRAMEWORK POST-2020: TOWARDS A MAJOR REFORM

At the moment, there is still a lack of consensus among all the involved stakeholders about the future of the EU Roma Framework post-2020. Existing assessments, including the EC's yearly evaluations, as well as findings from this report suggest that there are numerous shortcomings and several areas which need to be improved in order to deliver substantial progress for Roma. Furthermore, the feasibility of any potential future scenario has to be assessed against possible factors or trends that will define the future of the EU and Europe - variables that are hardly predictable. It should also be highlighted that even the best-designed plan will not produce visible results unless political will and real implementation of commitments are secured. Several options for the post-2020 process for Roma inclusion are listed below.

The first option for the post-2020 process is that the EU Roma Framework could continue as it is today but with minor improvements based on existing recommendations and lessons learned. Mechanisms of implementation, monitoring and evaluation and funding would be improved but no major changes would be introduced in the design, including the institutional structure of management and monitoring. Such an approach would guarantee the sustainability of current actions, combined with existing and functional institutional structure and instruments, and would take stock of past experiences. However, such an approach would not represent any substantial improvement and would continue the same practices which to-date brought scarce results.

Furthermore, accounting for the declining political will, and securing financial investment and effective implementation in member states might be challenging.

A second course of action towards Roma inclusion in the future could aim at re-framing and re-orienting the EU Roma Framework into “the EU Strategy against anti-Gypsyism”. Such direction would position the fight against anti-Gypsyism as a specific form of racism against Roma at the heart of the efforts. Rather than focusing uniquely on socio-economic inclusion through the current four pillars (education, employment, healthcare and housing), the strategy would tackle manifestations of anti-Gypsyism in all areas of social life, including the key areas. Such an approach would foster specific measures to tackle anti-Gypsyism in all its forms, including institutional and structural racism, and would concentrate on improving minority-majority relations. Nonetheless, this approach downgrades past efforts, de-prioritises Roma inclusion and does not envision responses to remedy existing inequalities and gaps. Lack of a targeted approach in key areas would not respond to specific needs of Roma, relying only on existing mainstream measures. Furthermore, an unfavourable socio-political environment and increasing xenophobia would inevitably mount obstacles to tangible impact.

A third possibility is also possible, if the purpose is to compensate for the lack of mandatory obligations in the context of the current EU Roma Framework. Such an approach could rely on enforcing mainstreaming of Roma inclusion agenda across EU legislation, thematic and sectoral strategies, including the inclusion of an explicit “Roma conditionality” in EU funding mechanisms. Such a strategy would make Roma inclusion principles transversal and contribute to their binding status. Nonetheless, it would represent a step backwards in the evolution of Roma inclusion efforts by crossing out an institutionalized Roma policy, which in itself should be considered an achievement. Furthermore, it would de-prioritize Roma inclusion, side-track anti-Gypsyism and be difficult to monitor. Another possible scenario could push for attributing a greater role to the EC for direct implementation of measures covered by current NRIS. In order to make up for the declining political will and improve the process of implementation, the EC could establish a separate managing agency responsible for direct interventions on regional and local levels, instead of channelling its EU investments via member states. Nonetheless, these scenarios have little chance of receiving political support.

Despite the variety of options, it seems clear that none of these possible options, if adopted alone, will succeed in effectively improving the lives of European Roma. Rather, the EU Roma Framework post-2020 should include a combination of the elements above, in order to accommodate, in as much as possible, the suggested recommendations and compensate for current weaknesses. Taking stock of the experiences and expertise accumulated between 2011-2016, suggests that the way forward for the post-2020 process consists of a major, substantial reform of the current EU Roma Framework. The following elements should be the foundation of the post-2020 EU Roma Framework:

- Maintaining an institutionalized EU Roma Framework as a common policy.
- Substantial reform of the EU Roma Framework:
 - Explicitly including anti-Gypsyism as a horizontal priority as well as through concrete, targeted proactive and reactive measures;
 - Expanding the scope of areas of activity, to include political participation and arts and culture;
 - Better framing of the target group to include diverse sectors of Roma population through explicit measures; and
 - Improved mechanisms of data collection and evidence-based policy design.
- Effective mainstreaming of Roma inclusion agenda across EU legislation.
- Establishing closer links between EU Roma Framework’s priorities and broader EU agenda as well as with funding mechanisms:
 - Ensure that in the next programming period 2020-2027 the principles of Roma inclusion are reflected in the EU multi-annual funding framework (MFF).

- Improved mechanisms of monitoring and evaluation as well as stronger application of penalties in case of non-compliance.
- Ensuring the most representative and legitimate Roma CSOs participate in the decision-making of Roma-related policies and practices at EU and national levels.

The process of renovation and reforming of the EU Roma Framework should start as soon as possible, in order to ensure that the next financial period 2020-2027 reflects the priorities of Roma inclusion. It is essential to ensure that the voices of those most concerned and directly affected – the Roma – are heard and taken into account in this process of critical revision of the current EU Roma Framework. CSOs, and especially Roma organisations, should be central to this process and should be systematically involved in a meaningful way. Furthermore, as the EU itself is currently at a crossroads, it is important to bear in mind the consequences that different future scenarios may have on minorities, and especially European Roma.

APPENDIX

ANNEX I: SPECIFIC RECOMMENDATIONS

Raising the profile of the EU Roma Framework – towards a binding approach

A major weakness of the EU Roma Framework is its non-binding character, allowing, in extreme cases, for member states to effectively avoid adopting specific Roma-targeted national strategies. In this regard, the EC as well as the Council should consider the following:

- Raise the profile of the EU Roma Framework as a binding legislative act.
- Require mandatory adoption of NRIS in all member states. Listing mainstream policies which may (also) target Roma or fragmentary approaches (which do not reflect all priorities) should not be acceptable.
- In order to raise the importance of Roma inclusion, consider the addition of a “Roma dimension” in existing EU legislation.
- Consider reviewing the language of the EU Roma Framework in order to make it more assertive, firm and unequivocal.
- Review and apply more rigorous mechanisms of sanctioning member states for non-compliance. The previous experiences of launching infringement procedures by the EC are welcomed as a positive practice:
 - Draw on existing legal mechanisms, including rulings of the European Court of Human Rights; Establish protocols for applying penalties when member states fail to adopt or implement NRIS correctly.
- Strengthen the role of the EC:
 - Promote more robust use of hard and soft policy tools in order to exert greater leverage on member states;
 - Raise the profile of the EU Roma Framework by involving the Office of President and Vice-President of the Commission in overseeing the implementation of NRIS by appointing Roma advisors to their cabinets on Roma issues.
- Promote stronger involvement of the Council as well as the European Parliament in providing political direction.

Coherent Policy Design

Due to discrepancies between the focus of the EU Roma Framework and the NRIS adopted in member states, as well as between the level of policy design and implementation, it is necessary to review and re-assess the framework’s design, in order to contribute to a more coherent and evidence-based policy. With regards to the EU Roma Framework, the European Commission should:

- Carefully re-assess the framing and the policy approach towards the target group – the Roma:
 - Re-think and review the framing of the target group itself in the EU Roma Framework;
 - Ensure balance between approaching Roma as an ethnic group and as a socially vulnerable group, avoiding ethnicisation of socio-economic problems which reinforces social stigma associated with Roma;
 - The target group definition should be mindful of internal heterogeneity of Roma communities. Intersectional approach should be adopted as to ensure that no sector of Roma population is excluded.

- Complement the four priority areas (education, employment, housing and healthcare) with targeted measures in additional areas of activity, identified by Roma civil society representatives (political participation; Roma culture, identity and history; social justice and justice system; explicit gender-sensitive measures).
- Require improved mechanisms of ethnic data collection.
- Require setting up realistic measurable goals and targets with adequate budget allocation; Further promote detailed planning of NRIS through introduction of specific indicators, including baseline values, targets and time-lines.
- Strengthen mechanisms of coordination among institutions and agencies of the EU and especially across relevant DGs.
- With regards to NRIS, the member-states should:
 - Ensure coherent policy design with regards to the target group framing;
 - In accordance with national legislation and tailored to reflect the specific circumstances on the ground;
 - Mindful of internal diversity of Roma communities and sensitive to multiple and intersecting realities that contribute to situation of vulnerability of exclusion. Consider tailored measures to attend needs of different sectors of Roma population (especially women, youth and elders).
- Ensure introduction of targeted measures in complementary areas of activity
 - Member states should ensure coherence and synergy between NRIS and the national minority-rights provisions;
 - Explicit initiatives should be introduced in countries where national legislation does not recognize existence of ethnic minorities (or where Roma are not recognized as a minority).
- Ensure more holistic, multi-sectorial and integrated approach to identified problems and areas of action, by acknowledging complexity. Promote solution-oriented approaches. Focus on long-term approaches.
- Guarantee evidence-based design of NRIS. Foreseen measures should be based on reliable data and thorough diagnosis. Improve mechanisms of ethnic data collection. Ensure detailed action-plans based on indicators:
 - Provide realistic goals and specific budgets needed for implementation of measures. Improve the alignment between the policies and funding.
- Improve mechanisms of coordination:
 - Across relevant ministries (for example, through setting up inter-ministerial working groups) and across different levels of administration (national, regional, municipal);
 - Across diverse stakeholders, with specific focus on Roma civil society and community members;
 - Clearly delineate competencies and responsibilities between different levels of government;
 - Provide the National Roma Contact Points with expanded mandates, appropriate competencies, funding and staff.
- Embed NRIS in the broader context of mainstream social policies, improving institutional alignment and greater synergy across policies.

Centrality of anti-Gypsyism

There is an increasing consensus among key stakeholders, including Roma civil society, that inclusion and integration approaches alone will not succeed in producing substantial change in the lives of European Roma. Existing anti-discrimination legislation provides insufficient tools to effectively counter anti-Gypsyism. Real socio-economic inclusion will not crystalize unless the deeply rooted racism in European societies and institutions is addressed.

In this regard, the EU Roma Framework should:

- Besides the anti-discrimination legislation, explicitly include anti-Gypsyism among the key priority areas - education, employment, housing and healthcare:
 - Require development of specific measures tackling anti-Gypsyism, including reactive and proactive, preventive measures.
- Monitor and counteract manifestations of anti-Gypsyism in the remaining four pillars of EU, especially in cases of institutional racism. Anti-Gypsyism should also be treated as a transversal, cross-cutting theme across all other areas of action.
- Promote recognition, operationalisation (also in courts) and application of anti-Gypsyism as a specific form of racism.
- Provide dedicated funding and specific policies which would consistently tackle anti-Gypsyism.
- Oversee effective application of European anti-discrimination legislation and act assertively, including through sanctions, when the EU law is breached; reinforce the mandate of the European Ombudsman.

With regards to NRIS, member states should:

- Design and implement specific measures that explicitly target anti-Gypsyism. Include anti-discrimination, and specifically anti-Gypsyism, as an additional pillar of NRIS. Establish measurable indicators and targets:
 - Design practical approaches to fighting anti-Gypsyism through reactive and proactive measures;
 - Designate explicit funding for reactive and preventive, proactive measures (including educating mainstream societies; training public officials and police; promoting Roma arts and culture; countering biased media coverage);
 - Promote and fund innovative strategies aiming at changing public discourse on Roma;
 - Develop tools to fight anti-Gypsyism at the local level.
- Promote recognition, operationalisation and application of anti-Gypsyism in national legislation and national courts.
- Monitor and counteract manifestations of anti-Gypsyism in the remaining four pillars of EU, especially in cases of institutional racism. Take a strong stance against hate speech (especially in political discourse) and hate crimes.
- Reinforce anti-discrimination legislation and ensure functioning of strong and independent equality bodies.
- Ensure that all stakeholders, including public and private actors and politicians at all levels, are held accountable and sanctioned for dissemination of anti-Gypsyism.

Stronger role and participation of Roma

Even though “Roma participation” is one of the principles of EU Roma-targeted policy-making, regrettably, it is often fulfilled superficially – Roma more frequently feel as “objects” of policies rather than active agents or equal stakeholders. It is essential to ensure meaningful, informed, independent and quality participation of Roma in decision-making with regards to NRIS and the Framework. Much more should be done to secure the development of independent Roma organisations, capable of effective lobbying, fostering political commitment and keeping the member states accountable.

In relation to the EU Roma Framework, the European Commission should:

- Provide specific guidelines as to how to secure Roma participation.
- Require introduction of specific measures which guarantee quality participation, including capacity-building and training of Roma civil society.

- Set up steering committees which will ensure that the most legitimate and representative Roma CSOs are participating in the decision-making process in regard to the Framework and NRIS;
- Ensure budget dedicated specifically at strengthening Roma civil society participation;
- Foster quality and informed participation by ensuring equal access to data and transparency.
- Oversee implementation of National Roma Platforms:
 - Foresee their strong role in overseeing the development of NRIS, including a degree of management and decision-making;
 - Secure solid channels of dialogue directly between the EC and the National Roma Platforms;
 - Strengthen the relationship between EC, National Roma Platforms and the EU Roma Platform by promoting regular and meaningful cooperation and exchange.
- Improve and strengthen regular and direct channels facilitating dialogue between Roma representatives and the EC:
 - Ensure input from national and local level Roma organisations; enlarge the pool of Roma interlocutors in Brussels;
 - Make sure that Roma voices are heard and taken into consideration at least to the same extent as that of pro-Roma civil society and non-Roma experts;
 - Secure meaningful participation, visibility and a degree of influence of Roma civil society in the EU Roma Platform and the EU Roma Summit meetings.
- Introduce measures promoting Roma political participation, especially at local level, as a way to ensure input of Roma in the decision-making processes.

With regards to NRIS, member-states should:

- Guarantee stronger role of Roma civil society organisations, especially in the framework of National Roma Platforms, in design, implementation and monitoring, including a degree of influence in decision-making processes.
- Foster development of independent Roma civil society organisations by adopting measures aimed at promoting Roma organisations, their capacity-building and training:
 - Allocate specific budgets to ensure meaningful participation and development of Roma civil society;
 - Ensure democratic and transparent mechanisms of participation and avoid practices of tokenism and co-optation.
- Empower Roma consultative bodies by increasing their scope of competencies and responsibilities.
- Promote participation of Roma experts and representatives in mainstream (not Roma-specific) consultative, decision-making, managing and monitoring bodies, especially at the local level.
- Strengthen the cooperation between National Roma Contact Points (NRCP) and Roma civil society representatives, and especially the National Roma Platforms:
 - Roma civil society should be closely involved in the work of NRCP, including the process of decision-making and monitoring and evaluation.

Importance of adequate monitoring and evaluation systems

Despite the calls for “robust monitoring system”, the mechanisms of monitoring and evaluation of the NRIS remain weak. Lack of reliable data disaggregated by ethnicity paired with lack of transparency and accountability mechanisms are the main flaws which make the process of monitoring and evaluation difficult and unreliable. With regards to the EU Roma Framework, the European Commission should:

- Require establishing mechanisms of collecting data, including data on ethnicity.

- Develop more sophisticated impact-oriented indicators, beyond the use of quantitative indicators.
- Ensure regular independent and external evaluations, mindful of potential conflict of interests of the evaluators:
 - Evaluations should be based on participatory methodologies. Ensure mixed teams of evaluators, including members of the Roma community where evaluated measures were implemented;
 - Require specific budgets for external evaluations.
- In its yearly assessments, contrast the reports provided by member states with shadow reports provided by civil society organisations:
 - Make publication of yearly reports of the member states public;
 - Ensure specific budgets are earmarked for shadow reporting, especially for Roma civil society organisations;
 - Ensure channels of direct communication between Roma civil society, the EC and the NRCPs;
 - Facilitate channels through which misuse of funds or problematic implementation can be reported directly to EC;
 - Involve more systematically EU agencies in complementing and contrasting the data provided by member states, including FRA and European Court of Auditors.
- Enforce more firmly the application of transparency rules and access to data, including financial allocation by member states:
 - Review mechanisms of sanctioning member states in case of non-compliance.
- Guarantee participation of Roma civil society in evaluation committees.
- With regards to NRIS, member states should:
 - Consider improving mechanisms of data collection including data on ethnicity, within the limits of national legislation;
 - Develop impact-oriented indicators rather than only quantitative and financial spending.
- Ensure greater transparency and access to relevant data:
 - Regularly publish relevant information on websites, including the yearly reports prepared for the EC. Make minutes of relevant meetings on NRIS public;
 - Ensure greater transparency of decision-making processes, including in distribution and assignation of funds;
 - Regularly publish all relevant financial information regarding the implementation of NRIS.
- Provide specific budget lines for independent, external evaluations and shadow reporting.
- Involve more actively and systematically Roma civil society representatives in evaluation and monitoring:
 - Include Roma civil society members in evaluation and monitoring committees;
 - Involve National Roma Platforms in the process of preparing annual reports for the EC;
 - In preparing annual reports of the EC, diversify sources of data (including from different levels of government and from a range of different public and private stakeholders).
- Strengthen the mandate and competencies of National Roma Contact Points in monitoring and evaluation.

Securing political commitment

Securing political commitment and political will for the implementation of NRIS remains a significant challenge; most likely this tendency of declining political support will strengthen in the future. The multiple crises and the growing popularity of anti-Roma sentiment across Europe since

2011 have negatively affected the implementation of NRIS and led to gradual deprioritising of Roma-inclusion efforts, especially on local and regional levels. Reversing these trends will remain a central strategic objective for European institutions as well as for Roma advocacy groups. Steps should be taken to secure political commitment for the EU Roma Framework up to 2020 and beyond.

In this regard:

- European institutions should establish strategies directed at securing political commitment of the member-states; these efforts should be strengthened by reinforcing relationship and synergetic approach across intergovernmental organisations, including the Council of Europe and the OSCE:
 - Consider introduction of system of incentives, e.g. ensure Council Recommendations or Conclusions which would aim to have the political commitment of governments for the 2020 process;
 - Review capacities of action in cases of non-compliance.
- Further link EU Roma Framework's priorities to broader EU agenda as well as to investment priorities; Roma inclusion objectives should be incorporated into EU funding frameworks.
- Strengthen the connection between NRIS implementation and the rule of law and the human rights approach.
- Assess to what extent EU Roma Framework's commitments can be "hardwired" to EU legislation.
- Reinforce national Roma civil society organisations, securing their independent and critical voice, improving their capacity and promoting internal consolidation of Roma actors through specific funding:
 - Through EU Roma Framework, secure channels of Roma participation in order to facilitate national-level advocacy and lobbying activities.

Ensuring funding

Funding is one of the main incentives motivating member-states to invest in Roma inclusion. In fact, the introduction of *ex ante* conditionalities and stronger linkage between EU Roma Framework and the EU financial schemes contributed to improved absorption and expenditure of funds for Roma. In this regard, the EC should:

- Strengthen links between EU political and financial priorities and the EU Roma Framework
 - Ensure that the multi-annual funding framework (MFF) is connected to policy priorities of the EU Roma Framework;
 - Align DGs own programmes and initiatives with priorities of the EU Roma Framework.
- Continue to use the Country-Specific Recommendations (CSR) with regard to Roma inclusion:
 - Expand the practice to all EU member states.
- Improve mechanisms of monitoring and evaluation in order to guarantee that the funds are spent adequately and not misused to perpetuate situations of exclusion (for example, through segregated housing) and are invested to produce positive impact in Roma communities.
- Ensure adequate budget allocation for NRIS in member-states; the EC should promote the use of national budgets to this end.
- Consider increasing the use of DGs' own budgets for direct implementation of measures and initiatives which support the process of implementation of NRIS in member states.

ANNEX II: LIST OF CONTRIBUTING ORGANISATIONS

Organisation	Country
European Public Health Alliance	Europe
National Network of Health Mediators	Bulgaria
CEGA Foundation	Bulgaria
Roma Standing Conference	Bulgaria
Slovo 21	Czech Republic
Awen Amenca - Association of Roma parents	Czech Republic
National Human Rights Collective Romeurope	France
La Voix des Roms	France
Butterfly Complex Development (Pro Cserehát) Association	Hungary
Green Workshop Foundation	Hungary
Association UPRE ROMA and University of Ferrara	Italy
Associazione 21 luglio Onlus	Italy
Centre of Resources for Social Inclusion CRIS	Romania
Impreuna Agency for Community Development Foundation	Romania
Roma Cultural Center - O Del Amenca	Romania
Roma Center for Health Policies - Sastipen	Romania
Centre for the Research of Ethnicity and Culture	Slovakia
Roma Advocacy and Research Center	Slovakia
Roma Advocacy Network	Slovakia
Federation of Roma Association in Catalonia - FAGIC	Spain
European Romnja Rights for Equality	Spain
Association of Roma Women - ROMI	Spain
Agora Roma Think Tank	Spain
Roma Association - UNGA	Spain
Dukha-Romani Network For People With Disabilities and Special Needs	Spain
National Federation of Gypsy Liaison Groups	United Kingdom
The Traveller Movement	United Kingdom

ANNEX III: QUESTIONNAIRE OF THE MIDTERM REVIEW

**Questionnaire on the midterm review of
the EU Framework for National Roma Integration Strategies (NRIS) up to 2020
Civil Society Perspective**

Please take some time to respond to this open questionnaire. Your critical perspective and expertise from the field will help to present an informed view of the achievements and shortcomings of the EU Roma Framework and the implementation of the NRIS in your country. If you lack sufficient information to answer some of the questions, feel free to leave them blank.

Your input is very important! Your contribution will be acknowledged in the paper by including the name of your organisation. The paper will be presented during the EU Roma week (27 March - 3 April, 2017) in Brussels.

Deadline for submission: **28th of February 2017**

Return to: dr. Anna Mirga-Kruszelnicka mirgaaa@gmail.com and Suad Skenderi su.skenderi@gmail.com

For questions please contact: dr. Anna Mirga-Kruszelnicka mirgaaa@gmail.com and Suad Skenderi su.skenderi@gmail.com

INFORMATION ON THE CONTRIBUTOR(S)

Please enter the name(s) of the organisation (s) you represent:

Please enter the country of the organisation (s) you represent:

1. ASSESSING THE EU FRAMEWORK AND OTHER EUROPEAN INSTRUMENTS

Please consider the whole period of 2011 to 2016, as well as Roma-targeted or mainstream European level policy, legal, funding instruments and coordination structures in place that are relevant for Roma inclusion.

Has the EU framework improved the overall situation and living conditions of Roma in terms of education, employment, healthcare and housing (Please explain your opinion/experience. *Please mention each priority area separately.*)

Has the EU framework contributed in the fight against anti-Gypsyism and anti-discrimination? (Please explain your opinion/experience.)

What do you consider to be the most important achievement(s) of the EU Roma Framework? (*Please mention at least 3 achievements.*)

What do you consider to be the most important weaknesses and gaps of the EU Roma framework? *(Please mention at least 3 challenges.)*

In respect of what has been achieved until now, keeping in mind the gaps you have just mentioned, what in your view should be key Roma-related European level priorities for 2017-2020 and post 2020? *(Please mention at least 3 priorities.)*

How do you envisage the continuation of the European approach to Roma inclusion in the post-2020 period in respect of policy, legal and funding instruments and coordination structures?

In your opinion, does the EU Roma framework need reform for the post-2020 period or does it need to remain the same as it is now? Please explain your opinion/experience.

How do you evaluate the role of the European Commission in the EU Roma framework?

With regards to the process of participation, consultation and Roma civil society involvement in Brussels?

With regards to its interaction with the Member States?

With regards to monitoring and evaluation?

What do you suggest the European Commission should do to improve the process of coordination and consultation with Roma CSOs in regards to the decision-making and implementation of the EU Roma framework in Brussels?

II. ASSESSING NATIONAL STRATEGIES, MEASURES AND INSTRUMENTS

Please reflect on the National Roma Integration Strategy (NRIS) in your country (or integrated sets of policy measures) as well as national, regional and local policies, legal, funding instruments and coordination structures, during the period between 2011-2016.

POLICY DESIGN IN YOUR COUNTRY:

How do you evaluate the transposition of the EU Roma framework into the National Roma Integration Strategy in your country? Are there areas or issues which you feel remain unattended by the current NRIS in your country?

In your opinion, are there sectors of Roma population that remain unattended or insufficiently targeted by the EU Roma framework (e.g. Women, youth, elders, immigrant Roma, “integrated” or “middle class” Roma etc.)? If yes, please explain why?

In your opinion, are there other areas of life in your country that NRIS should include (e.g. arts and culture, history, language, identity, justice system, political participation, technology, trade, etc.)? If yes, please explain why?

Has your NRIS taken into account and adapted to the Country Specific Recommendations (CSR)? If yes, did NRIS contribute to the implementation of CSR?

When responding below please be mindful of the priority areas of the NRIS: education, employment, healthcare and housing, including anti-Gypsyism

IMPLEMENTATION:

Overall perspective:

What do you consider to be the most important achievement(s) of the NRIS in your country and in what areas have there been most progress? *(Please mention at least 3 achievements.)*

What do you consider to be the most important weaknesses and obstacles of the NRIS implementation in your country? *(Please mention at least 3 challenges.)*

How can these weaknesses and obstacles be resolved by 2020?

Have there been area/s in which you have observed deterioration between 2011-2016? Please specify in what areas and what may be the reasons behind it.

In your opinion, has the shifting context of the current socio-political situation in Europe (such as the rise in populism and xenophobia or the “refugee crisis”) affect the implementation of the NRIS in your country? If yes, in what way?

How do you envisage the continuation of the national approach on Roma inclusion and what, in your view, should be key national/local priorities for 2017-2020 as well as for the post-2020 strategy? (Please mention at least 3 priorities.)

IMPLEMENTATION IN KEY AREAS:

Have the corresponding Ministries in your country adapted legislation, resolutions or other policy interventions to specifically accommodate priorities of NRIS with regards to education, employment, healthcare, housing and anti-Gypsyism? If so, in what way?

1. *Education*

2. *Healthcare*

3. *Employment*

4. *Housing*

5. *Anti-Gypsyism*

Has there been sufficient funding in order to effectively implement measures related to five areas below of the NRIS? If yes, in what way?

1. *Education*

2. *Healthcare*

3. *Employment*

4. *Housing*

5. *Anti-Gypsyism*

Has there been sufficient capacity to monitor and evaluate the implementation of NRIS with regards to the five areas below? If yes, in what way?

1. *Education*

2. *Healthcare*

3. *Employment*

4. *Housing*

5. *Anti-Gypsyism*

With regards to the five areas below, what specifically have been the main achievements on the NRIS in your country? If so, in what way?

1. *Education*

2. *Healthcare*

3. *Employment*

4. *Housing*

5. *Anti-Gypsyism*

COORDINATION AND CONSULTATION:

In your opinion, with regards to the institutional structure, what has been the role of the National Roma Contact Points? Do they have enough competence? Do they have sufficient funding? Do they have enough access to data to be able to coordinate the implementation effectively?

In your opinion, do the National Roma Contact Points have sufficient capacity to influence decisions with regards to implementation on different levels of government (national, regional, local)?

In your opinion, has there been enough opportunities for civil society actors for consultation and participation? Has the institutional structure in your country provide channels for civil society input?

In your opinion, how do you evaluate the capacity of civil society actors to influence the process of decision-making and implementation of NRIS in your country?

MONITORING AND EVALUATION:

In your opinion, are the current monitoring and evaluation tools sufficient? Please specify why.

In your opinion, is there enough transparency and access to data with regards to the progress and funds spent on the implementation? Please specify why.

In your opinion, do the civil society actors and target communities have sufficient channels to effectively contribute to the process of monitoring and evaluation in your country? Please specify why.

FUNDING:

In your opinion, is the NRIS sufficiently funded? Is the current funding sufficient to efficiently implement the NRIS in your country to cover all the necessary areas: education, housing, employment, healthcare and anti-Gypsyism? Please specify the area and why.

How much money has been absorbed so far by your government? How much remains to be used and what Roma issues would those funds cover? Should the remaining budget be redirected in your view in order to cover the most pressing issues that affect the Roma community? If yes, please explain what those pressing issues are.

Other comments regarding funding:

OTHER OVERALL COMMENTS:

Please include here if you have other comments and recommendations:

Open Society European Policy Institute contacts on Roma and anti-discrimination:
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