

Analysis of the National Roma Integration Strategies

**European Roma Policy Coalition
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Introduction

Under the new European Framework for National Roma Integration Strategies, EU Member States were required to submit strategies on Roma inclusion to the European Commission (EC) by the end of December 2011. The Strategies are to be evaluated by the EC and the results presented in form of a report by April 2012. In its assessment, the EC has promised to take into account contributions from civil society. In this context, the European Roma Policy Coalition (ERPC), consisting of Roma and pro-Roma organisations at EU level, has engaged with various civil society organisations to learn about their assessment of the NRIS.

In a first step, the ERPC carried out desk screening assessments¹ of the National Roma Integration Strategies (NRIS) submitted by the governments of Austria, Bulgaria, Denmark, Finland, France, Germany, Hungary, Italy, Latvia, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Wales, as well as the Czech Republic's Roma Integration Concept for 2010 to 2013. This report highlights the main analyses of the survey results and the desk screenings of the NRIS.

In a second step, the ERPC gathered the views of Roma and Traveller organisations and civil society on the processes that led to the design of the NRIS in the different Member States. In particular, the ERPC undertook a survey to assess whether the consultation of civil society and Roma and Traveller organisations was appropriate and whether anti-discrimination issues are being taken seriously in the NRIS. The survey was disseminated electronically to a wide audience throughout the EU and beyond and was completed by over 300 persons, in majority coming from the civil society sector.

The ERPC members are composed of Amnesty International, the European Roma Rights Centre, the European Roma Information Office, the Open Society Institute, European Network Against Racism, Minority Rights Group International, the European Roma Grassroots Organizations Network, Policy Center for Roma and Minorities, the Roma Education Fund, and Fundación Secretariado Gitano. From December 2011 until May 2012, the rotating chairmanship of the ERPC is held by the European Network Against Racism, in close cooperation with ERIO and Amnesty International. The ERPC wishes to share the outcome of the survey and the desk screening assessments with the European Institutions and all other interested stakeholders as a contribution toward improving strategies toward Roma integration and monitoring progress made by measuring outcome in implementing the National Strategies in the four key priority areas of health, housing, employment, and education.

This report is divided into three main parts. The first part is based on an analysis of ERPC reviewers on the NRIS for the different Member States that submitted a strategy. The second part reflects an analysis of survey results on various stakeholders' perspectives of the NRIS. The third part reflects the lessons learnt and the recommendations.

The first part, entailing the assessment of ERPC reviewers of the NRIS, is structured as follows:

- Highlights from the NRIS
- Review of Budget Allocations in NRIS
- Coordination Mechanisms in Implementing NRIS
- Indicators and Monitoring

¹ The template and indicators used for the desk screening assessment can be found in annex 1 of this report.

The second part addresses the survey the ERPC developed and carried out. This section explains the methodology used, the number of responses received, and the types of stakeholder organisations involved in completing the survey. The main objective of this second part, however, is to provide the overview and analysis of the survey answer results on stakeholders' participation and anti-discrimination.

The third and final part consists of "Lessons Learnt and Recommendations" for the national governments to improve processes in developing, implementing and monitoring national Roma integration strategies and for enhancing Roma participation.

Part 1: Analysis of NRIS Desk Screenings

Highlights from the National Roma Integration Strategies

Austria

While Austria submitted a NRIS, it has no specific policy experience with Roma integration. The Austrian government does not target specific ethnic groups in its policies. Instead, it applies general integration policies that address both minorities and immigrants. On a project level, specific targeting is taken place. The Strategy lists various examples of projects that address challenges faced by Roma.

For this reason, the Strategy elaborates on those policies that address general integration issues in the four areas of housing, health, education and employment. In that context, the Strategy refers to some targets, e.g. on school drop-out and school performance. But there are no specified targets on Roma.

The Strategy follows a needs-based approach as opposed to a rights-based approach (p.5). However, it is not based on a factual needs-analysis.

The Strategy entails a brief chapter on anti-discrimination measures in general that go beyond the four key areas of the EU Roma framework and are not limited to support adaption by immigrants and minorities. The Strategy refers to Austria's National Integration Plan, which is partly dedicated to the fight against discrimination of immigrants and minorities. The integration plan recommends to the authorities various possible measures, such as the establishment of integration councils and anti-racism training in police, administration and schools. None of the listed measures are targeted specifically to ensure Roma integration, which is consistent with the general approach of not targeting ethnic groups.

Bulgaria

Bulgaria has experience with the Roma integration strategies and with specific measures targeting Roma, such as the Decade of Roma Inclusion, involvement in the EU Roma Network and building on experiences from previous strategies.

When it comes to utilizing the 10 Common Basic Principles (CBP) on Roma Inclusion as a base-line in the Bulgarian NRIS, the CBP are mentioned but not sufficiently reflected in the overall Strategy. The Strategy states that the 10 CBP are taken in consideration for the formulation, implementation, observation and evaluation of integration policies for Roma. However, detailed provision on concrete policies and implementation in practice is not available. Two of the principles that are not clearly developed within the Strategy, include: 1) aiming for the mainstream and 2) applying an intercultural approach.

In regard to the CBP 8, a wide, public consultation process did take place. The institution responsible for the design and elaboration of the National Roma Strategy organised regional and local consultations with the participation of civil society organisations as well as local and regional authorities. Furthermore, comments and recommendations were taken in consideration during the drafting process.

According to the desk analysis of the Bulgarian NRIS, however, the objectives for defining ambitious, targeted and realistic goals within a defined timeline are not fully covered by the EU framework. For instance, the Strategy does not provide an adequate description of the current situation because 1) data is minimal; 2) systemic factors for social exclusion of Roma, such as segregated education have not been identified; and 3) a lack of analysis from previous years on the good and bad practices in Roma inclusion programmes abounded. This inadequate identification of the problems has affected the

formulation of strategic goals and concrete measures. The Strategy and the Action Plan reveal a lack of awareness and/or no intention on the part of the government to tackle crucial issues for the integration of Roma in each of the 4 priority areas defined by the EC.

Consequently, the Bulgarian NRIS falls short in terms of establishing concrete goals, specific timelines and targets, reliable baseline data, clearly identifying what measures will be covered by EU Funds, and what will be covered from the national budget. Furthermore, the Action Plan only refers to activities up to the end of current funding period 2014.

Despite these deficiencies in the NRIS, the objectives go beyond the EU framework. The Bulgarian government has added other goals that are relevant to the national context, such as media outreach, preserving Roma culture, the rule of law and antidiscrimination. These additional goals, however, are only vaguely elaborated upon. It is unclear what mechanisms for implementation will be applied or how these goals will be monitored. Overall, the Bulgarian NRIS, based on the desk screening of the EPRC does not give the impression of being realistic and feasible.

Regarding the recommendation to follow a human-rights approach, including in particular gender equality, non-discrimination, desegregation, combating anti-Gypsyism, and promoting proactive approaches to Roma inclusion, the Bulgarian government proposed some measures that are, however, largely insufficient. Some measures are planned to target anti-Gypsyism, but this is perceived to be insufficient. Furthermore, there are no measures to address gender equality or migration issues, and little mention of empowering Roma and Travellers. If empowerment is understood as encouraging participation of Roma in public affairs, then there are no measures addressing this; if, on the other hand, empowerment is understood in a broader sense, then the measures are not enough.

Czech Republic

Following the Commission's Framework Communication, the Czech Government did not devise a new National Roma Integration Strategy. As reported in the *Prague Monitor*, Environment Minister, Thomas Chalupa, explained that the Czech government's Concept of Romany Integration for 2010-2013 includes the EC's demands: "At present, the Czech Republic has a well-developed national coordination mechanism relating to the Romany agency. It is neither desirable nor useful to create new tasks for ministries, especially at the time of budget austerity".²

The Czech Republic has experience with the Roma integration strategies and with specific measures targeting Roma, such as the Decade of Roma Inclusion, involvement in the EU Roma Network and building on experiences from previous strategies.

Even without explicit reference to the 10 Common Basic Principles for Roma Inclusion, the Concept complies with all the principles. The Concept above all takes into account the socially excluded Roma population, which it breaks down into vulnerable groups by sex, disability, sexual orientation, age, religion or nationality.

The only principle that the Concept falls short on is Principle 7 – Use of Community instruments. In essence, the Concept does not contain references to the EU legislative and political framework. There is a complete lack of monitoring and evaluation of the use of EU instruments in general. The Concept also lacks any reference to the EU Roma Network.

²<http://praguemonitor.com/2011/08/05/senate-refuses-comply-call-ec-revise-national-roma-inclusion-Strategy>

The goals comply with those defined by the EU Framework, specified and expanded upon in the national context. The national goals are broken down very well and in detail. The Concept has three levels of goals. The main goal is "achieving conflict-free coexistence between Roma communities and the rest of society". This main goal is broken down into six sub-priorities:

1. Creating a tolerant environment;
2. Removing external barriers to incorporation;
3. Assisting in removing internal barriers to incorporation;
4. Improving the social status of members of Roma communities;
5. Developing and integrating Romani culture and language into the majority culture of Czech society; and
6. Ensuring safety.

The Concept contains a whole range of other goals in the areas of Romani language and culture, excess debt, social protection and safety. All the priority areas are based on the real national context and set their goals quite fittingly and realistically.

The Concept is an update of the previous concepts since 2000 and sets priorities and goals on a short-term timeline. For this reason the Concept can propose realistic measures for the short- and medium-term. On the other hand, however, it does not offer long-term 2020 goals with concrete indicators.

A weak point of the Concept is the absence of budgets for individual measures and indicators of their impact. Monitoring of implementation thus speaks to the fulfilment of individual tasks, but not to the actual impact on the life of the Roma minority. Another weak point of the Concept is the weak mandate of its guarantor, the Council of the Government of the Czech Republic for Roma Minority Affairs (RVZRM), which does not allow it to force realisation of measures or issue sanctions for failure to implement them. The reduced budget and insufficient capacity of this office also considerably limits its ability to operate. The Czech Government should thoroughly enforce the implementation of Concept measures by their individual guarantors, strengthen the mandate of the RVZRM and support the institutionalisation of the Agency for Social Inclusion.

When it comes to adhering to a human-rights approach, the anti-discrimination measures included in the Concept are as follows:

- Preventing discrimination or segregation of Roma children at school;
- Providing non-discriminatory access for Roma to vocational training, to the job market and to self-employment tools and initiatives; and
- Providing non-discriminatory access to housing, including social housing.

Key principles include anti-discrimination measures as described in the Principles of the Long-Term Roma Integration Concept through 2025:

- Roma as an integral part of Czech society;
- Rigorous protection of fundamental rights and freedoms (understood to mean civil rights, without any form of discrimination);
- Roma integration policies are to be in agreement with policies for the protection of rights of minorities; and
- Recognition of the multilayer identity of Roma.

In terms of addressing anti-Roma prejudice, the Concept describes the main goal as "achieving conflict-free coexistence between Roma communities and the rest of society". The six priority areas were described above. The Czech Concept does make some mention of Roma women, in the chapters on employment, with limited mention in the chapter on education – lifelong education and care of children. There is no reference to gender in the chapter on health, however, which is by far the weakest

pillar of the Concept. Overall, there is no coherent gender mainstreaming principle underpinning the Concept.

The Czech Concept does not address the issue of empowerment. According to comments made from an Open Society Foundation (OSF) review, there is no space made in the document for active involvement or participation of Roma themselves in resolving the various challenges; rather it outlines systemically oriented measures by the majority society.

Denmark

Denmark submitted a NRIS and mentioned the CBPs, which are, according to the reviewer, sufficiently reflected in the overall Strategy. For example, reference is made to principle no. 2: “Explicit but not exclusive targeting” – “ethnic data can be registered as a part of project-based activities at the local level allowing for appropriate explicit but not exclusive targeting of Roma issues” (p.2). Likewise principle no. 3 is mentioned: “Intercultural approach” – “The national unit for Ethnic Employment Measures supports Job Centres with knowledge about how to help ethnic minorities, including Roma, to get a job” (p.9).

The objectives do not cover the full range of the EU Framework because the NRIS does not have a special monitoring system to measure progress. Furthermore, the objectives do not go beyond the EU Framework. There are timeframes proposed and the expected length of the integration programme under the Integration Act is three years. Overall, the NRIS does give the impression of being realistic and feasible. According to the reviewer, the NRIS is not ambitious enough and fails to have any indicators to monitor its implementation.

While sufficient measures are envisaged in the NRIS to target anti-discrimination in general, the NRIS does not target anti-Gypsyism at all. Some measures are planned in the NRIS to target gender equality and the issue of empowerment, but these are insufficient. Migration related measures are also envisaged, but only in relation to a particular priority area, but not in all areas of the Strategy.

The national strategy is linked to other domestic or EU anti-discrimination and social inclusion policies through the following instruments:

- Integration Act – available tool for Roma inclusion;
- 2007-2013 EU Structural Fund Programmes – source of funding;
- Danish Health Act – basis for equal access to healthcare;
- Danish Act on Gender Equality – basis for promotion of gender equality; and the
- Action Plan to Combat Human Trafficking - domestic policies against trafficking in human beings.

Finland

The Finnish NRIS was created before the EU Roma Framework. The Finnish National Policy on Roma has existed since 2009. Finland is involved in the EU Roma Network and the Finnish NRIS builds on the experiences/lessons learnt from previous strategies. Previously, the Finnish government did not have strategies, but already had some sectoral policies and temporary measures on, e.g. housing and education. The Common Basic Principles (CBP) are mentioned in the Finnish Strategy and are sufficiently reflected.

Furthermore, the objectives cover the full range of the EU Framework and they further go beyond the minimum defined by the Framework. The Finnish Strategy draws inspiration from the European Commission Communication 2008/420, issued in July 2008 and entitled “Non-discrimination and equal opportunities: A renewed commitment”. The Finnish Strategy foresees the following:

- Positive discrimination/special measures at all levels to reach the goal of inclusion and de facto equal treatment of Roma;
- Additions to the State budget for a particular grant for municipalities to work on Roma issues; and the
- Protection of linguistic and cultural rights of Roma. Maintaining the Romani language by developing its instruction and research at university level.

Contrary to the majority of other NRIS, the timeframes are defined within the Finnish Strategy:

- In 2011, the first assessment of the Strategy is planned, serving the first opportunity for modifying the implementation plan;
- In 2014, a progress review is planned;
- In 2017, the final assessment is planned with the objective that Finland remain the forerunner in Europe in promoting equal treatment and inclusion of Roma; and
- In 2013, there is to be an international assessment utilising expertise on Roma from the CoE, the EU, the OSCE, and other international institutions.

The actions outlined in the Finnish Strategy are, in principle, both realistic and feasible, and in accordance with a thorough analysis of the existing situation. Each of the four key areas (education, employment, health, and housing) is covered and specific policy guidelines necessary for the realisation of the Strategy are foreseen. The policy guidelines outline the objectives of the key areas and list the detailed sub-objectives and measures included in the policy. Each action indicates the responsible body and contributing bodies. However, the Strategy does not list budgets needed for each action nor the financial responsibility for executing the actions. There is, however, a generic budget allocation outlined (see section on budget allocation).

The promotion of equal treatment and anti-discrimination is the overall objective of Finland's National Policy. Anti-discrimination measures are foreseen in each key area, which go beyond the target of anti-discrimination in general. Actions are planned to also fight multiple discrimination. However, whether the measures will be sufficient depends on the implementation capacity of the different authorities, especially local authorities. This is particularly relevant in terms of budget allocation and capacities in local decision-making bodies.

Anti-Gypsyism is not only defined and recognised in the Finnish Strategy, but the fight against anti-Gypsyism represents one of the objectives of the Strategy. However, there are no specific measures referring to anti-Gypsyism foreseen in the Strategy. The government has at least meanwhile recognised the role of anti-Gypsyism in limiting access to restaurants and housing, and has consequently, announced its willingness to tackle such discriminatory tendencies by means of an ongoing campaign to change attitudes among the public.

There are no specific measures addressing gender equality relative to specific areas, but gender equality is rather viewed as a cross-cutting issue throughout the Strategy. In addition, the NRIS points to the risk of exclusionary tendencies for young Roma men.

Different measures foreseen by the Strategy contribute to the empowerment of the Roma minority. Empowerment is indicated as one of the objectives of the Strategy. Nevertheless, it is difficult to assess if the measures are or will be sufficient, as there is no information about capacities, in particular at local level. Another absence is the failure to address the issue of migration in the Finnish NRIS.

The Strategy notes that there is a link to several other social policy programmes and points to the risk that such programmes may not specifically focus on Roma. Several such programmes are currently starting. According to the Finnish government, Roma are likely to be specifically mentioned within these programmes.

France

France submitted a NRIS. France has some experience with specific measures targeting Roma, for instance, the ERPC is aware of one partnership: a bilateral collaboration agreement with the Romanian government aimed at controlling migration flows by Roma.

The CBPs are mentioned, but are not sufficiently reflected in the overall Strategy. The Strategy refers to certain principles (no. 1, 2, 5, 7, 8: explicit but not exclusive targeting, which is endorsed only with regard to the specific situation of Travellers; non-discrimination; use of EU funds; involvement of local authorities; emphasis on gender equality), without mentioning explicitly the 10 CBPs. However, the Strategy emphasises repeatedly the contradiction between an ethnic-based approach (i.e. reflected in targeted actions aimed at Roma inclusion) and French Law, and contends that the promotion of a 'Republican' approach to integration and universal citizenship renders an ethnic notion invalid in the national legal framework of public policies. Roma participation and the involvement of the majority population in favour of Roma (principles no. 9 and 10) and the overall objective of full inclusion (principle no. 4) would therefore be subsumed under the overarching "Republican" principle of "Citizen participation and integration". Inevitably, this foundation renders both the basic principles concerning explicit but not exclusive targeting (principle no. 2, on ethnic grounds established by the Commission), and an intercultural approach (principle no. 3) irrelevant. Importantly, the French government underlines that it will respect scrupulously the Constitutional prescriptions (regarding its conception of citizen equality) in the presentation of the policies developed in the framework of the National Strategy. The Strategy does not mention principle no. 6 (Transfer of evidence-based policies) even though the obstacle there can not be the French approach to universal citizenship.

The objectives do not cover the full range of the EU Framework. It does not set achievable national goals for Roma inclusion in the strategic areas of education, employment, health and housing on the grounds that no ethnic approach is adopted according to French Law. The Strategy covers all four strategic areas and proposes specific actions in each of them, with a particular focus on and a set of targeted actions for the *Gens du voyage* (Travellers).

It also does not identify disadvantaged micro-regions or segregated neighbourhoods. However, seven regions (potentially 13) will take full advantage of the amendment of Art.7.2 of the European Regional Development Fund (ERDF) regulation to use at least 9.2 million EUR (potentially 16 million EUR) from ERDF funds for marginalised neighbourhoods and for the 'villages d'insertion' (potentially benefiting Roma, albeit indirectly). Apart from the aforementioned reference to the ERDF, mention is made of disadvantaged neighbourhoods or to neighbourhoods where Travellers temporarily settle, albeit only in relation to the provision of educational services adapted to Travellers' needs.

Local authorities and civil society are involved, especially Roma organisations, but not all civil society organisations (only the Commission Nationale Consultative des Gens du Voyage was consulted). The French NRIS appoints a national contact point.

The objectives do not go beyond the EU Framework. Most actions do not define precise timeframes, and rather insist on the further development or consolidating existing actions (especially with reference to the Travellers or Gens du voyage) and in relation to the deployment of Structural Funds for inclusion actions (particularly integrated in the framework of the revised Structural Funds Regulations). However, some measures explicitly delineate timeframes for actions:

- Second chance schools: 12,000 youths to be incorporated by 2012.
- Personalised monitoring or student achievement in primary and secondary education: generalization of this measure by 2013.
- Rationalisation and simplification of social benefits by 2014, in accordance with the National Reform Programme (NRP) and EU country recommendations.

- Implementation of a Single Labour Insertion Contract by 2013.
- Deployment of new instruments for the accommodation of homeless persons by 2013.
- Accompaniment measures for the formalisation of economic activities of Travellers in the Yonne region (January 2010-June 2012).

In all cases, the Strategy emphasises that Roma will benefit on the same basis as others in accordance with Republican principles of universal citizenship. Overall, the NRIS gives the impression of being realistic and feasible on its own grounds.

The Strategy emphasises the fight against discrimination in all fields and makes a relevant link between social inequalities and discrimination, underlining again that measures are not to be undertaken through an 'ethnic lens'. However, beyond the creation of an Observatory of Discrimination under the mandate of the recently established *Défenseur des Droits* (Ombudsman, or Rights Commissioner that replaces the *Haute Autorité de Lutte Contre les Discriminations* [Halde]), the Strategy only refers to specific actions (labour market insertion measures benefiting all vulnerable persons, such as the 'contrats aidés') and one *potential* action in the area of employment: the recommendation by the *Défenseur des Droits* of the generalisation of so-called 'normalised' questionnaires for job applications in organisations with more than 250 employees that guarantee the applicant's anonymity. The Strategy also refers to the support of civil society organisations that promote non-discrimination. Furthermore, awareness-raising measures are being undertaken (pedagogical material for teenagers, information on the *Gens du voyage*), involving civil society actors in some cases (eg. the FNASAT).

Despite these positive measures, the NRIS does not target anti-Gypsyism at all. Actions are planned for effective gender equality (however, these are restricted only to bridge wages differentials) in the field of employment and in the field of healthcare with health mediation initiatives targeting women and children in particular. The document also focuses on actions against human trafficking, with support mechanisms for women (including Roma) victims of prostitution and other criminal networks. As far as addressing other migration-related measures, outreach and labour inclusion measures are planned for migrants, particularly youth, living in slums or deprived urban areas. The NRIS does not really address the issue of empowerment at all.

The National Strategy is systematically subsumed, in accordance with the French government's rejection of an ethnic approach to inclusion, into general/mainstream domestic social inclusion policies in the strategic areas (employment, education, health, housing, anti-discrimination) identified by the European Platform for Roma Inclusion and reiterated in the EU Framework for National Strategies. The Strategy takes note of the targeted measures adapted to Travellers' needs that have been developed for close to a decade. The establishment of the Halde and its successor, the *Défenseur des Droits* (referred to above) took place in compliance with EU anti-discrimination law. The Strategy refers to France's contribution to Europe 2020 targets in education, employment and social inclusion and poverty reduction.

Germany

While Germany submitted a NRIS, it has no specific policy experience with Roma integration. Any such efforts are integrated into Germany's policies on either the integration of minorities, since German Sinti and Roma are recognised as national minorities or in Germany's integration policy for migrants for non-German Sinti and Roma.

As part of its Strategy, Germany has submitted examples of integration projects that specifically target Roma. Three out of the four examples addressed Romani migrants. Overall, the Strategy focuses mainly on the integration of Romani migrants. This is based on the assumption that German Roma and Sinti are not in need of integration measures. However, the recommendations of the Central Council of

German Sinti and Roma, which are attached to the Strategy, indicate that integration has not yet fully been achieved, as many Sinti and Roma in Germany still experience wider discrimination.

According to the ERPC assessment of the German NRIS, the objectives fail to cover the full range of the EU Framework. The NRIS does not itself entail specified goals. Instead it makes references to the national integration policy for migrants for this purpose, resulting in the “National Action Plan for Integration” as the basis for action. The action plan contains objectives, commitments and instruments to achieve the better integration of migrants in Germany. It addresses the integration of about 16 million people residing in Germany with a migration background. There is no governmental data on the number of Romani migrants in Germany due to a prohibition to collect data on ethnic grounds (related to World War II). A recent study³ on the current situation of education of Sinti and Roma in Germany, initiated by various Roma organisations, estimates the number of Romani migrants to be about 50,000. The objectives specified in the National Action Plans for Integration do not go beyond the EU Framework. There are also no defined timeframes.

Overall, the NRIS does not leave the impression of being realistic and feasible. The Strategy lacks an analysis of the situation of Roma and Sinti in Germany. As a result, the Strategy lists general measures and instruments that are in place to allow equal access of all, including minorities, to employment, education, health and housing. However, it misses out on the specific challenges Roma face. The study mentioned above shows that even for Roma families that have lived in Germany for several generations, access to education among Roma is more difficult than for the majority of the population. The study also shows that the majority of Germany’s Roma population experiences discrimination and is still impacted by the traumatic experiences of the Holocaust. Unfortunately, the Strategy fails to address the deep rooted discriminatory tendencies toward the Roma and Sinti population in Germany.

As far as adhering to a human-rights approach, Germany’s NRIS has failed miserably. The NRIS does not entail any targeted anti-discrimination measures, despite recommendations made by the Central Council of German Sinti and Roma for instruments and measures supporting the fight against discrimination. Discrimination of Roma and Sinti was identified as an ongoing main challenge to their integration throughout Germany.

The NRIS also fails to address targets on important issues, such as anti-Gypsyism and gender equality. While the Strategy does recognise that women and girls experience multiple discrimination, it nevertheless fails to specifically target gender equality. As far as addressing migration issues in the NRIS, the focus in the Strategy lies on integration measures for migrants, but does not specify any specific measures for Romani migrants. As mentioned above, an estimated 16 million people in Germany have a migration background. About 50,000 of those are Roma (about 0.3 per cent of the migrant population). As such, more concerted targets would have been expected.

The NRIS does include some empowerment measures, but these are largely insufficient. As part of its migration policies, Germany offers integration courses, allowing migrants to gain a better understanding of German society. However, the Strategy does not support empowerment for active citizenship. For instance, a recommendation by the Central Council of German Sinti and Roma on fostering the political representation of Roma in political organs was not incorporated into the Strategy.

Hungary

Hungary submitted a NRIS. It has experience with Roma integration strategies and with specific measures targeting Roma including, for instance, joining the Decade of Roma Inclusion, involvement in

^{3 3} Daniel Strauss (Hrsg), Studie zur aktuellen Bildungssituation deutscher Sinti und Roma, http://www.stiftung-evz.de/w/files/roma/2011_strauss_studie_sinti_bildung.pdf.

the EU Roma Network, and significant international partnerships established to support Roma integration.

The new Hungarian NRIS builds on the experiences/lessons learnt from previous strategies. Hungary was involved at the inception of the Decade prior to its launch. The Strategy is rich in terms of analytical detail and its 'diagnosis' of the challenges of Roma inclusion, and draws from high quality independent research. It is frank in terms of successes and failures in 'lessons learnt' over the past decade. To quote from the Open Society Analysis:

"Important factors mentioned here include the failure of the state to provide equal access to public services and need for systematic solutions; the tendency of programs targeting poor people to benefit the relatively less deprived; the failure of EU funds to have a substantive impact on social inclusion so far; the territorial concentration of multiple levels of deprivation in the least developed micro-regions."

In general the Hungarian Strategy does comply with the 10 CBPs. However, there are some questions about compatibility with these principles in the NRIS. To quote from the Open Society review:

"The Strategy is not clear about de-segregation, integration. In education the Strategy avoids promoting integration or de-segregation. In housing the document is not clear about de-segregation: programs will be limited to the improvement of the situation in segregated areas or will contain also assistance to move from these areas. These are in conflict with the principle of aiming for the mainstream (No 4).

The Strategy itself states that previous public works programs proved to be ineffective; still, increasing employment is foreseen mainly by public works. No explanation is given if and how deficiencies of previous programs can be corrected in foreseen programs. This is in conflict with the requirement of evidence-based policies (principle No. 6)."

The objectives cover the full range of the EU Framework and go beyond. The Roma Strategy covers - besides education, employment, health and housing - a fifth sub-chapter with goals on inclusion, attitude change and anti-discrimination. These are relevant to the national context.

As far as timeframes, concrete measures are described only in the 3 years action plan (2012-14). This action plan is mainly a list of measures that were already planned before the drafting of the Strategy, rather than the practical steps of the Strategy itself. While the Strategy has the ambition to close the gap between marginalised Roma communities and the majority population (even if no clear targets are defined), the action plan does not include measures that are strong enough to counterbalance the massive negative trends of exclusion, especially during the financial and economic crisis.

While the NRIS gives the impression of being realistic and feasible, it has a number of limitations. The list of proposed interventions in the draft Strategy is exhaustive, and in the context of the current financial crisis and strict limits on national spending, it is important to devise a narrower set of clear priorities, and identify which measures will be implemented regardless of budget cuts; for which measures additional resources will be mobilized; and which measures will be postponed or quietly abandoned in the name of either market efficiency or austerity measures.

When it comes to the 'how', there is very little information on how to enhance the quality and efficiency of implementation. Most of the measures proposed are expensive; and for most of the measures the necessary dedicated expertise is in short supply. While the draft is a definite improvement on previous attempts, the lack of clear priorities carries with it a risk that implementation will focus on the cheapest programmes and not the most important, long-term strategic and efficient

interventions, resulting in an ad hoc process without the necessary strategic coordination at government level.

The clear intent running through the Strategy, with its anti-poverty provisions and the pursuit of equity in access to services, opportunities and outcomes to close the gap between Roma and non-Roma is to be commended as far-sighted and forward-looking within the wider European context of Europe 2020. However, within the wider Hungarian policy context, as one reviewer noted, there is a glaring omission throughout the text: this government has launched an ambitious Strategy of economic policy, aiming at growth, strengthening the middle class and including, inter alia, a tax cut for the rich, radical reduction of unemployment benefits and criminalising homelessness. There is a tension between this raft of measures, likely to exacerbate inequality, at the very least in the short run, and the anti-poverty agenda contained in the draft. While economic growth and social equity are not intrinsically irreconcilable goals, in this particular national policy context some trade-off between social goals is unavoidable. This would need to be acknowledged and a clear set of priorities identified, accompanied by, as the Commission suggests, a corresponding time schedule and adequate funding with a clear indication of the sources for such funding.

One welcome aspect of the Strategy draft is the unambiguous tone and references to the principle of inclusion as a complex two-sided social process that must engage the majority as well as the minority. The Strategy mentions the importance of changing negative attitudes, and rightly warns of the dangers of poorly-conceived campaigns backfiring. However, as noted in the OSF review, "De-segregation, mentioned in the EU framework concerning education and housing, seems to be a taboo for the government."

Civil society organisations in their submission to the European Commission state that while that the Strategy mentions the damaging effect of discrimination and exclusion from a comprehensive social aspect, on the issue of human rights:

"the human rights approach is **almost completely missing**. It does not prevail as a horizontal principle and there is no separate part dealing with fundamental rights. It is very important that that the Strategy should contain **specific anti-discrimination measures and tools**, which aim to reduce prejudices and serve to prevent the spread of racially or ethnically motivated crimes. It is important that **dedicated funding** should be available for this purpose both in the document and in the Action Plan. Considerations for defending fundamental rights and the related concrete measures should appear in the Strategy at least with the same weight as social-economic and territorial aspects. "

In the foreword the importance of awareness raising and the fight against discrimination is clearly mentioned, but references to the "shocking incidents of inter-ethnic conflict," and attributing "the spread of extreme radical ideologies" to "crimes committed by Roma perpetrators with a presumably ethnic motivation...." flies in the face of research concerning the meteoric rise of Jobbik, and the wide support for far-right groups in Hungary.

As regards gender equality, some measures are planned but they are insufficient. The 'situation analysis' concerning Romani Women is sound and a welcome inclusion in the Strategy. There are some general recommendations but when it comes to details concerning implementation the NRIS is too vague. The principle of gender mainstreaming was not sufficiently fore grounded in the Commission Framework Communication and in the NRIS the 'political principles of social inclusion' do not include gender mainstreaming.

The Strategy does not address the issue of migration at all.

As regards empowerment, the Strategy (Section 8:6) specifically mentions going beyond consultation, that social inclusion must involve the 'empowerment of those living in poverty and the Roma community in order to enable them to shape society'. This section entitled 'Involvement, awareness raising, fight against discrimination' is a very welcome general statement of intent and should be seen in a constructive light as a first step to promote wider dialogue concerning what is to be done?

However, some recent important Government policies and decisions do not reflect the equality agenda of the Strategy: The new law on education does not guarantee that disadvantaged children receive knowledge and skills needed for long term employment (see e.g. compulsory schooling only until the age of 16, etc.). Changes in the taxation system do not increase the motivation of employers to employ low educated people. Plans for public work programs as the main source of employment raise further worries.

Italy

Italy submitted a NRIS drafted by UNAR, the national anti-discrimination office, which will be the Italian national focal point on Roma issues.

The 10 Common Basic Principles on Roma Inclusion are often mentioned throughout the strategy and sufficiently reflected in several different areas, including:

- Increase of Roma participation, use of cultural mediators, creation of an officially recognized Roma representation institution
- Mainstreaming of Roma issues and use of a holistic approach
- Several gender-specific actions e.g. in the areas of education, health, employment
- Use of inclusion and non-discriminatory policies e.g. the creation of a contact centre addressing discrimination, the creation of a database on discrimination, non-discriminatory access to job trainings etc.
- Planning of several regional projects
- Involvement of civil society in all planned actions
- Several references to EU legislation
- Transfer of evidence-based policies and good practices e.g. of the successful ACCEDER project in Spain.

The NRIS covers the full range of the EU framework and even sets objectives that go beyond it, such as a broad focus on anti-discrimination, trainings on human rights and anti-Gypsyism for armed forces and police, new legislative measures on the minority status of Roma, citizenship and residence permits, information and awareness-raising campaigns on anti-Gypsyism and the Roma Holocaust, measures on cultural mediation, training for media in order to reduce stereotypes on Roma and capacity-building.

However, timeframes are not really detailed and it is therefore not possible to determine whether the overall strategy is realistic.

The Italian NRIS contains sufficient measures on anti-discrimination and anti-Gypsyism in all the four key areas. It puts a strong focus on gender equality in the fields of education, employment and health, but does not target the issue of migration, which is only addressed in the field of health.

The issue of empowerment is mentioned as a specific goal of the NRIS. In fact, the Strategy's overall objectives are the achievement of effective social inclusion of Roma communities and their empowerment in order for them to be fully able to claim their rights. Moreover, throughout the Strategy it is often pointed out that an important goal would be to abandon a welfare approach and to achieve empowerment. However, it seems that there are no concrete measures to match this objective.

Latvia

Latvia submitted a NRIS. There was either mention of when Latvia first began gaining experience with the Strategies for Roma integration or when they were approved and updated. Latvia did not join the Decade of Roma Inclusion or the EU Roma Network. As regards partnerships established to support Roma integration, it is a member of the Council of Europe, in particular in the National Level Expert on Roma issues. Latvia is also a member of the Council of Europe's Ad-hoc Committee of Experts on Roma Issues (CAHROM). The new NRIS does not necessarily build on lessons learnt from previous strategies. However, it is considering whether to exchange lessons learnt in the middle of the implementing period of the national strategy.

The CBPs are mentioned several times in the NRIS and appear sufficiently reflected in the overall Strategy. The NRIS reports that it has been developed in accordance with the CBP and takes account of principle no. 4, which specifies the need to insert the Roma in the mainstream society. The reviewer highlights the significance of this considering Latvia's small number of Roma in the country. The CBPs are also reflected in the proposed measures, for example, in regard to Roma participation and the capacity building of civil society being developed in the NRIS text.

The objectives cover the full range of the EU Framework. Objectives are set in main four areas (education, employment, housing, and health) and go beyond to human rights, Roma participation and the cultural and societal memory.

Furthermore, timeframes are defined. The Strategy extends until 2019, when the final assessment of implementation is to take place. Latvia decided to follow an 8-year plan, with one bigger assessment in 2014, and also producing information in 2016. The timeframe seems suitable, each indicator has its own specific time specification and it seems very realistic. According to the NRIS, the Latvian legislation has the maximum planning period for the guidelines of seven years; therefore it is only for the period from 2012 to 2018. Overall, the NRIS gives the impression of being realistic and feasible. The progress envisaged for individual indicators is relevant and not overestimated.

Sufficient measures are envisaged within the four key areas (housing, health, employment and education), which are envisaged beyond targeting just anti-discrimination. There are not measures targeting anti-Gypsyism, yet most of the anti-discrimination measures also target the anti-Roma sentiments. In addition, proposed measures also target society at large in order to change perceptions toward ethnic minorities. To establish the legitimacy of such measures, the NRIS uses the public opinion poll where 53 per cent says they do not want to have Roma as neighbours. Moreover, the Guidelines of the Strategy are also developed based on the ECRI Recommendation no. 13 on combating anti-Gypsyism and discrimination against Roma.

While the NRIS does not target gender equality or the issue of migration, empowerment measures are planned in the different areas to empower Roma in general. As regards social inclusion, the document, proposed by the Latvian government, called "National Identity, Civil Society and Integration Policy Guidelines 2012 – 2018" is being developed in accordance with EU initiatives and documents, as stated in the first paragraph of the NRIS. These include the Europe 2020 Strategy for smart, sustainable and inclusive growth, CBPs, Council Directives, the Council of Europe recommendations and national studies, such as "Roma rights to education: implementing the situation in Latvia." On the national level the NRIS is built in line with the National Reform Programme, though the later does not explicitly mention Roma. Many of its measures, however, will affect Roma at large.

Netherlands

The Netherlands submitted a NRIS which makes no reference to the CBPs. But the NRIS appears to be inspired from the CBPs, for instance, principle no. 2: "Explicit but not exclusive targeting" – "The Netherlands has no specific policy aimed at groups such as Roma. Instead, all policy should be equally

effective for all groups in society.” (p.2) Principle no. 6 – “Transfer of evidence-based policies” – “As a supplement to national policy, the Netherlands would like to work more closely with other EU Member States, and see more cooperation among them, which is why the Netherlands has included this issue in this document.” (p.2)

The objectives do not cover the full range of the EU framework. The NRIS does not set real targets, does not allocate adequate funding, does not define concrete action plans and does not have a monitoring system to measure progress. The objectives do not go beyond the EU framework, but the NRIS does include two additional themes: law enforcement, and crime and exploitation of Roma children.

There are no defined timeframes nor does the NRIS give the impression of being realistic and feasible. It is based on the principle that integration is “not the responsibility of the government but rather of those who decide to settle in the Netherlands” (p.2). Policies that do not require accommodation on the part of wider society are doomed to fail. They proclaim a zero-sum notion of rights, i.e. minorities must accept majority culture.

Some measures are planned for following a human-rights approach, but they are largely insufficient. Anti-Gypsyism is not targeted at all in the NRIS; nor is gender equality. Roma migrants are addressed in relation to employment and linked to the residence conditions of the Free Movement of Persons Directive (2004/38/EC (i.e. need to have means of support if they wish to stay in the Netherlands longer than three months). Some measures to address the issue of empowerment are planned, but they are insufficient.

The NRIS is in line with the basic principles of the government’s policy document on integration, social cohesion and citizenship published on 16 June 2011. “Anti-discrimination” is linked with the Municipal Anti-Discrimination Services Act which facilitates reporting on discrimination and with Article 1 of the Constitution that bans discrimination.

Poland

Poland submitted a NRIS and has experience in terms of strategies for Roma integration. The Polish government adopted the first Resolution on National Roma Integration Strategy on the 19th of August 2003 for the years 2004 – 2013 with the possibility of extension after 2013. Poland is also involved in the EU Roma Network. Furthermore, the new NRIS builds on the experiences/lessons learnt from previous strategies. This NRIS is a continued Strategy since 2004, created on the basis of a Pilot Programme for the Roma community realised that took place from 2001 to 2003 in the Malopolska region (south of Poland), where the largest Roma community lives.

Since the Polish NRIS was created in 2003, before the development of the CBPs, they are not explicitly mentioned in the Strategy. However, the Polish NRIS does generally reflect most of these principles. Those which are not very visible in the NRIS include: gender mainstreaming and transferring other good practice (evidence based policies). Consequently, the objectives do not cover the full range of the EU framework.

In the Polish NRIS there is no target timeframe set. The programme has been running since 2004 and since then there were practically no changes made to the Programme (apart from some small technical regulations). Evaluation is not specified concretely and there is no indication of the short, middle and long term targets.

Overall, it is difficult to assess whether the NRIS is realistic, as the current Strategy has been in existence since 2004, only ending in 2013. The outcomes will be taken into account when drafting the next Polish Strategy for 2014-2024. It is to be hoped that lessons will be learnt and that improvements will be made to the current programme.

As regards a human-rights approach, the Polish NRIS entails some targeted anti-discrimination, anti-Gypsyism, and gender equality measures, but these are largely insufficient. The NRIS does not even address the issue of migration. Empowerment related measures are envisaged only in relation to a particular area, but not in all areas of the Strategy. The national strategies are linked to the following other domestic and EU anti-discrimination and social inclusion policies:

- Law on National and Ethnic Minorities and Regional Language, adopted in January 2005
- The EU directives on Racial and Employment Equality (Directives 2000/43/EC and 2000/78/EC) have been adopted by Poland. In the field of employment and labour relations, the anti-discrimination provisions of the EC Directives were primarily implemented by the Polish labour code, which was twice adapted in order to transpose the directives

Portugal

Portugal submitted a NRIS and is involved in the EU Roma Network. The CBPs are mentioned and are sufficiently reflected in the overall Strategy, evident by the principles no. 8 "Involvement of regional and local authorities," no. 9 "Involvement of civil society," and no. 10 "Active participation of the Roma" - "The model chosen for the conception of the National Strategy includes the involvement of the responsible ministries of the areas that need a bigger attention, through its representatives, the participation of regional and local authorities and institutions of the civil society, as well as of wide groups of diverse elements of the Roma communities..." (p.7)

The objectives cover the full range of the EU framework. The NRIS sets targets, allocates adequate funding, defines concrete action plans and has a monitoring system to measure progress, but the objectives do not go beyond the EU framework. The timeframes, however, are defined and the given timelines seem realistic and reasonable. Considering this is a draft NRIS, more precision in regard to some of the timeframes will hopefully be given in future.

Overall, the NRIS gives the impression of being realistic and feasible. The NRIS is based on the principle that integration is a two-way process, thus shaping policies which seem to potentially succeed. The NRIS has ambitious but realistic goals, concrete targets and it provides indicators. It involves the participation of local authorities, civil society and Roma people in all stages of the NRIS (i.e. design, monitoring and evaluation).

Some targeted anti-discrimination measures are planned, but they are insufficient in reaching a human-rights approach. For instance, the NRIS fails to address targets for anti-Gypsyism or the issue of migration. The NRIS mainly promotes empowerment within the area of gender equality but also by promoting citizenship education. There are also specific measures addressing the multiple discrimination of Romani women.

The NRIS is in line with the following national policies: Basic Principles (Art.99 d, h), Basic Rights and Duties (Art. 12 and 13) and Social Rights and Duties (Art.64 and 65) established in the Portuguese Constitution (p.6) The NRIS is in line with the following EU policies: Ten Common Basic Principles and Race Equality Directive 2000/43/CE (p.6).

Romania

Romania submitted a NRIS and joined the Decade of Roma Inclusion. The CBPs made very little impression upon those drafting the NRIS, the reasons for which are elaborated upon in the following points:

- There is no sensitivity to the gender dimension in the policy measures adopted, except some specific national programmes in the field of public health;
- Civil society was not involved in a real consultation process, i.e. none of the NGOs' contributions were taken into consideration;

- The active participation of the Roma is almost absent in the policy measures designed for their inclusion;
- The use of community financial instruments in the implementation of the policy measures of the Strategy is only 'wishful thinking'; as in the current financial exercise there are no funds available for the Major Fields of Interventions under the Axe 6 of the ESF, the only place where the Roma are explicitly mentioned as a target group and counted as indicators. So far, the negotiations for the next programme 2013-2020 have not begun; and
- Local authorities were not involved in drafting the policies.

The description of each measure, the responsible institutions, and the deadlines are clear, but the indication of the cost, budget, and indicators are missing. However, the objectives go beyond the minimum defined by the EU Framework by bringing in two additional priorities: culture and social infrastructure.

The current Strategy used no baseline study (even though it was proposed by the Coalition for National Strategy for Roma Inclusion). The Strategy has no progress indicators and the budgetary indications are very general (e.g. structural funds, local budget, and other sources). If there is no baseline study, it is impossible to measure progress. There are some indicators of the proposed actions, but they are not correlated with the measures of the sectorial action plans of measures. Beyond the declarations of intent to pursue an integrated approach, the NRIS in fact is just a compilation of sectorial action plans of each of the ministries involved.

In terms of following a human-rights approach and incorporating targeted anti-discrimination measures, much work is still needed. The Romanian NRIS cannot be described as anything more than minimalist in terms of combating anti-Gypsyism and 'the promotion of a proactive approach to Roma inclusion'. Overall, the Strategy is far from mainstreaming gender in all areas; apart from a few measures targeting women in public health, there is little in terms of promoting gender equity. Furthermore, the issue of migration is not addressed at all.

Some measures to improve Roma participation and inclusion are incorporated in the Strategy, but these are insufficient. In contrast, there are no proactive measures to enable Roma to participate in public life, to promote active citizenship, community based participation, legal and civic rights education, informed choice during elections, or put an end to the mainstream political parties buying votes at election time.

Slovakia

Slovakia submitted a NRIS. For the purpose of the NRIS, the Slovak government has not drafted new action plans for the key areas. This is due to the fact that in June 2011 the Revised National Action Plan of the Decade of Roma Inclusion for years 2005 – 2015 was finalised and adopted. The action plans on education, employment, housing and health had been prepared before the drafting of the Strategy started and are to be used as action plans for this Strategy. The Decade Action Plan comprises a time schedule with the most problematic being the area of education where all activities are due in 2015. These action plans are going to be evaluated in 2015 and new action plans will be drafted and adopted for the period from 2016 to 2020.

The CBPs are mentioned but are not sufficiently reflected in the overall Strategy. At the beginning of the Strategy, there is a well elaborated separate section on principles which should govern all policy areas and be applicable throughout the whole Strategy. These principles include: destigmatisation, desegregation and deghettoisation. This part also includes principles of implementation of the Strategy which are: solidarity; legality; partnership; complexity; conceptuality, systemic approach and sustainability; respect of regional and sub-ethnic characteristics; gender equality; responsibility and

predictability. Moreover the non-discrimination aspect should cover all these principles as it is stated in the Strategy. The CBPs feature at least implicitly in all the key policy areas.

The objectives cover the full range of the EU framework and they go beyond the EU framework by mentioning financial inclusion, non-discrimination and public opinion. These areas are considered to be cross-sectional. The part devoted to anti-discrimination in the Strategy provides a very broad understanding of discrimination and focuses mostly on better implementation of the anti-discrimination act, legal services and other institutional issues. However, the non-discrimination aspect is omitted in each of the key areas and the non-discrimination goals need to be more thoroughly elaborated.

As regards a human-rights approach, some anti-discrimination measures are set in the NRIS, but these are insufficient. The NRIS contains a strikingly honest and critical tone, and a strong recognition of systemic segregation and discrimination in key sectors (education and health, in particular), and includes a theoretical framework on levels and consequences of discrimination. The 'global goals' in the NRIS are described as follows:

- Implement the antidiscrimination legislation more effectively through providing effective and targeted assistance to the victims of discrimination due to their Roma ethnicity.
- Implement into everyday life functional mechanisms for addressing and preventing conflicts on a local level relevant to community problems with the goal of reducing the existing tension in the mutual coexistence of Roma and non-Roma population, and gradually eliminate feelings of resignation and insolvability of such conflicts.

This is followed by a section entitled: 'Targeting the majority society – Initiative of integrating the Roma through communication' which has 3 pillars:

1. Communication focusing on **demystification** of the Roma and education;
2. Supporting inclusive approach, education and expertise; and
3. Common pro-integration platform.

Considering the complexity of combating deep-rooted anti-Gypsyism, it is impossible to tick the box 'sufficient' at this stage. But suffice it to say at this stage that the analysis is frank, forthright and intellectually astute. The measures proposed are far-sighted and if there would be political will to follow through, the NRIS provisions on tackling prejudice mark a long-overdue but very welcome starting point. In the real world, the recent anti-Roma election campaign posters splayed over the country by the Slovak National Party, who could form part of a future coalition government, offer a sobering corrective to any premature optimism.

As regards gender equality, the Strategy opens with a clear and concise declaration on the Principle of gender equality:

"the adopted policies must adhere to the principle of gender-sensitive approach due to the fact that no measure, no policy, and no decision are gender neutral ... A dual approach under best EU practices will be applied in implementing the Strategy: applying gender aspect and specifically supporting women in areas where they are disadvantaged compared to men. A gender impact analysis will be carried out prior to adopting any measures of a legislative or strategic nature."

However, beyond the declaration, the principle of gender equality scarcely surfaces. Goals, measures, implementation details, etc. in the four priority areas do not reflect a gender mainstreaming approach, and simply do not address the integration challenges posed by the multiple discrimination faced by Romani women. Furthermore, the NRIS does not address the issue of migration at all.

If empowerment is understood as increasing the capacity for Roma civil society participation, there is a detailed section on the Roma NGO sector, which accurately analyses the weaknesses of Roma civil society and suggests that the 'base Strategy vision to 2020 should therefore focus on two goals – reduce the gap between Roma and non-Roma NGOs and strengthen the institutional and expert capacities of Roma NGOs so they are capable of self-financing and drawing upon the EU funds.' A number of measures are proposed which, if implemented, would have a cross-sectorial impact.

Slovenia

Slovenia submitted a NRIS, which was drafted by the Bureau for Minorities and the Governmental Commission for Roma, and adopted by the government at the beginning of 2010. It is titled "National Programme of Measures for Roma of the Government of Slovenia 2010-2015" and it is an update of past activities. The new NRIS builds on the experiences/lessons learnt from previous strategies.

Slovenia previously had policies on Roma issues but it has never had an overarching Strategy. Their experience is based on:

- 1995 Programme Measures to Assist the Roma;
- 2004 Strategy of Education for Roma in the Republic of Slovenia; and
- 2007 Roma Community in the Republic of Slovenia Act.

The NRIS covers the full range of the EU Framework, however, since the NRIS has been in place for some time, evidence from implementation shows that activities and measures to attain these objectives have consistently only taken place in the area of education.

The objectives go beyond the EU framework, as the Slovenian NRIS also foresees the preservation and the development of Roma culture and language as well as their promotion towards the majority population. There are timeframes defined. For each measure foreseen in the Strategy there is an implementation timetable but it does not seem suitable because it is general and unspecified.

Overall, the NRIS does not give the impression of being realistic and feasible. The NRIS indicates priorities, measures, indicators, responsible bodies, implementing bodies, and funds. However, it is essentially rather a paper describing already existing projects and activities than a real Strategy for the future. Slovenian NGOs have affirmed that civil society, experts and local authorities have not been consulted, and objectives have not been correctly defined.

Discrimination is recognised as one of the main problems faced by the Roma minority and the fight against it represents one of the priorities of the NRIS. Accordingly, measures addressing discrimination are planned. At this point of time and on the basis of the Strategy alone, it is not possible to evaluate the adequacy and sufficiency of these measures. Some targeted measures are clearly lacking, however, including anti-Gypsyism, the issue of migration and the issue of empowerment. Gender issues are taken into consideration in relation to a particular theme (employment), but there are no gender-oriented targeted measures and not all of the priority areas are even considered in regard to gender issues. Furthermore, the NRIS is not linked with other policies as far as the reviewer could determine.

Spain

Spain submitted a NRIS. The country has experience with strategies for Roma integration since it has had Programmes/Action Plans for the Development of the Roma Population since 1989 (current Programme: 2010-2012), and created the State Council of the Roma People in 2005. Spain also joined the Decade of Roma Inclusion and is involved in the EU Roma Network. Other significant partnerships include Council of Europe Alliance of Municipalities, Equinet, ECRI. The new NRIS builds on the experiences/lessons learnt from previous strategies. The preparation of the Strategy followed a participatory approach in line with the process underlying the 2010-2012 Plan of Action for the Development of the Roma Population. This process involved the consultation of eight Ministries of the

central government, Autonomous Communities, the Spanish Federation of Municipalities and Provinces (FEMP), the State Council of Roma People and the most representative Roma organisations. The NRIS takes stock of the institutional recognition of Roma and consolidation of Roma political representation in the 2010-2012 Plan, as well as of the explicit measures implemented within its framework (employment, education, institutional and cultural recognition among others).

The 10 Common Basic Principles on Roma Inclusion are mentioned and are sufficiently reflected in the overall strategy. The Strategy refers to all CBPs, explicitly or indirectly. It refers explicitly to Principles no.2 and 4 (explicit but not exclusive targeting, aiming for the mainstream) in the description of adapted universal social services combined with specific measures (health, education, social housing, anti-discrimination, active employment policies). Furthermore, a series of initiatives are described with explicit reference to non-discrimination, Roma participation, the involvement of the majority population in favour of Roma (Principles no. 1, 9 and 10): the creation of the Council for the Promotion of Equal Treatment and Non-Discrimination on Grounds of Race and Ethnicity, and the establishment of public prosecutors specialised in discrimination and hate crimes in the provinces of Barcelona, Madrid and Malaga. Recently, the Attorney General appointed a Deputy Attorney General of the Supreme Court for the safeguarding of equality and anti-discrimination. All these initiatives involved the active participation of Roma associations and other relevant NGOs supporting Roma inclusion directly or indirectly. A series of other actions are also consistent with the Common Basic Principles without referring directly to them: the involvement of regional and local authorities (no.8) is referred to repeatedly (in part because the high level of decentralisation of Spanish polity makes it impossible to implement social policies without regions and municipalities); the intercultural approach (no.3) (e.g. intercultural training for teacher); the use of EU instruments (no.7); transfer of evidence-based policies (no.6); and a cross-cutting gender focus (no.5).

The objectives defined in the NRIS cover the full range of the EU framework. In particular, achievable national goals for Roma inclusion in the strategic areas of education, employment, health and housing are set, disadvantaged micro-regions or segregated neighbourhoods are identified, strong monitoring methods are included, local authorities and civil society, especially Roma, organisations are involved and a National Contact Point is appointed.

The objectives go beyond the EU framework, since quantitative targets have been set, certain quantitative targets have been broken down by gender, and specific targets have been set that were not present in the EU Framework. The Strategy also aims to fine tune its indicators, by incorporating indicators in its follow-up regarding relative poverty, material deprivation and the intensity of labour unemployment, in line with the Europe 2020 Strategy and NRP. This will allow for a more precise measurement of actions.

Most actions define precise timeframes, with clear targets set for 2015 and 2020, achievable through the existing and foreseen actions – although austerity measures and the economic crisis are likely to derail these actions.

The implementation of the NRIS seems feasible at this point; however, the economic crisis in Spain is a real threat for the provision of social services because of the budget restrictions. The impact of potential new cuts in this field, and consequently in Roma inclusion, is unknown.

Concerning the recommendation to follow a human-rights approach, sufficient measures are envisaged within the four key areas and beyond to target anti-discrimination and anti-Gypsyism in general. Moreover, sufficient measures are envisaged within the four key areas (housing, health, employment and education) to target gender equality and the NRIS envisages specific measures addressing multiple discrimination of Romani women.

The NRIS also addresses the issue of migration and sufficient measures are envisaged within the four key areas and beyond to target fundamental rights of migrant Roma in general. There is a specific section within the “Other complementary courses of actions” referring to Roma populations originating from other countries. The Strategy will pay special attention to EU Roma citizens residing in Spain, or other Roma persons originating from third countries. The focus on work will be inclusive, to the extent that participation in measures and actions aimed at Spanish Roma will be extended. Likewise, where circumstances allow, specific measures and actions will be rolled out in order to promote and ease social inclusion. These will, as a priority, focus on:

- Protection of fundamental rights by means of the effective application of European instruments, particularly directives on free movement and residence, and anti-discrimination.
- Basic assistance and mediation activities with social services.
- School support and follow-up actions.
- Favouring inclusion in existing programmes and actions for training and access to employment.
- Health education activities and support for access to and use of healthcare services.
- Language learning.
- Access to housing in inclusive surroundings.
- Promotion of transnational cooperation programmes, particularly with Romania, with the support of instruments provided by the European Social Fund.

For the development of these measures, special attention is paid to the implication of local authorities, particularly towns with a larger population of European Roma citizens, or who have particular difficulties in terms of integration.

Finally, the NRIS envisages sufficient measures within the four key areas and beyond to target Roma empowerment in general. The term empowerment is not used in the NRIS; however, the NRIS makes sufficient reference to Roma participation in decision-making, for example through the State Council of the Roma People (as well as various regional consultation bodies), which must be consulted for all interventions in strategic areas (and participate in the design of relevant policies and programmes); furthermore, the financial support of Roma associations promote Roma empowerment in general.

Overall, the Spanish NRIS makes systematic reference to domestic anti-discrimination efforts (creation of equality bodies and specialised prosecutors, anti-discrimination legislation, mediation) in all strategic areas (education, health, as well as in relation to Roma migrants, as well as to the recent transposition of the EU anti-discrimination directives. An effort is being made to achieve the mainstreaming of non-discrimination as a cross-cutting principle in all fields, for example through the National Equal Anti-Racism Strategy and Citizenship and Integration Action Plan, as well as various regional and local initiatives along these lines.

United Kingdom

The UK will not submit a NRIS. The reason provided is that the Council Conclusions agreed by the EU Member States at the Employment, Social Policy, Health and Consumer Affairs Council on 19th May 2011 do not require Member States to produce national Roma integration strategies, but leaves them with wide flexibility to develop sets of policy measures within wider social inclusion policies, as an alternative to producing national strategies. In addition, as the executives of England, Scotland, Wales and Northern Ireland are responsible for these matters in their territories, they will prepare individual documents regarding their policies to promote Gypsy and Traveller Inclusion.

Specifically, the UK Permanent Representation to the EU has submitted the following documents:

- A document gathering information on the Traveller and Roma inclusion policies in **Northern Ireland**
- The Gypsy and Traveller Framework for Action and Delivery Plan “Travelling to a Better Future” of **Wales**

- UK's response to the Council of Europe's Opinion on the UK under the Framework Convention for the Protection of National Minorities.

For **England**, the progress report of the Ministerial Working Group on reducing Gypsy and Traveller Inequalities in England, which will set commitments by government ministries in areas such as education, health, housing and employment will be released soon, but there is no date foreseen at the time of writing this report. The devolved administrations of **Scotland** have also been asked to provide information on their policies.

Wales is the only executive that has submitted a framework for action and not just a gathering of policies and measures already undertaken.

The document 'Travelling to a Better Future - A Gypsy and Traveller Framework for Action and Delivery Plan' is the first document of its kind to be published in the UK and sets out policy direction for the Welsh Government and its partners in respect of Gypsies and Travellers. The Framework for Action focuses on policy areas which impact on the lives of Gypsies and Travellers, these being accommodation, education, training, health, social care, participation and engagement.

When it comes to using the 10 CBPs on Roma Inclusion as a base-line, no reference is made to the CBP, but the Wales Framework for Action is inspired from them.

Many of the CBPs are reflected in the Framework, e.g. measures based on information gathered on the situation on the ground and not on preconceptions, building upon equal opportunity policies with specific measures where necessary, promoting the integration of Roma in the mainstream, involving different stakeholders, including local and regional authorities, civil society and the Roma people themselves. However, there is no reference to others such as the use of European instruments and awareness of the gender dimension.

The objectives of the EU framework are not completely covered in the Welsh Framework, as it only addresses the areas of education, housing and health (not employment). The proposals and specific objectives set in these three areas are in general terms in line with the proposals and goals set in the EU framework although not all goals are covered, or at least not in an explicit way.

It is important to note that the Welsh Framework focuses on groups (Irish Travellers, Gypsies from Scotland, England and Wales) which are traditionally associated with a travelling way of life. As a consequence, measures proposed are to a great extent adapted and in line with this lifestyle.

The objectives do not extend beyond the EU framework. While the framework does not cover the four areas included in the Framework, it pays a lot of attention to some aspects not so much covered in the EU framework, including:

- The relationship between the Gypsy and Traveller community and the settled population (objective 1); and
- The engagement and participation of Gypsy and Traveller children and young people. Section 6 of the document refers to this area and a specific objective has been set in this respect: objective 11: to enable young Gypsies and Travellers to become more responsive to their own needs and become more adept at expressing their views and opinions at both local and national level.

The Framework for action does not provide clear information on the timeframes. First of all, it does not indicate the time period covered by the Framework (and therefore whether it covers until 2020 as requested by the EU framework). Regarding the implementation of the specific proposals and objectives, the Framework only indicates timescales for some of them and they are short-term

timeframes (2011-2013). Some of the action plans referred to in the Framework cover a slightly longer period (until 2014). Despite this, the NRIS gives the overall impression of being realistic and feasible.

The NRIS entails anti-discrimination measures in relation to only a particular theme, but not in all areas of the submitted Strategy. As stated above, employment is not addressed. It also fails to address gender equality or migration issues. The Framework for Action has been developed specifically for the indigenous Gypsy and Traveller population in Wales and does not address emerging issues as a result of migrant Roma from Bulgaria and Romania settled into Wales. The Migrants Forum, a Welsh Government Strategic Group, will address any emerging issues on European Roma.

Furthermore, there is no specific mention of anti-Gypsyism, but it refers to some experiences related to this. For instance, it mentions the fact that Gypsies and Travellers are more likely to experience racial abuse because of their ethnicity, or hate crimes or incidents (no related measures are mentioned). In the area of education, it further addresses racist bullying and name calling, an area in which the Welsh government has undertaken specific actions (e.g. guidance circulars addressed to schools, cooperation with the Welsh Anti-Bullying Network).

While the Framework only mentions the word empowerment once, it proposes measures which will contribute to the empowerment of Roma in the areas of education, housing and health. It also refers to the engagement and participation of Gypsy and Traveller children and youth as well as the consultation and engagement by public bodies with the Gypsy and Traveller community about issues that directly affect or impact upon them.

The policies proposed by the Welsh executive should be seen in the context of the national and regional legislation, policies and guidance (as mentioned in chapter 3). Although there is no explicit mention of EU policies, national policies providing the context for the Welsh action should be in line with them.

Review of Budget Allocations in the NRIS

Austria

The Strategy does not give any information on budget allocation but provides a list of projects that are conducted in the context of EU initiatives and receive respective EU funding. It is further linked to the EU 2020 strategy.

Bulgaria

There are no budgets allocated for the Strategy in Bulgaria. A Decision of the Council of Ministers to withhold the Annex 'Programs for the Implementation of NRIS', described by Amalipe Foundation as the most concrete constituent of the document package, with clear deadlines and funding sources, implies that the NRIS is lacking the vital ingredient for implementation.

Indications of specific levels of funding are not available, although resources are identified. There are some general commitments, for example for activity 4.2 'Provision of conditions for maximum enrolment and early adaptation in the system of preschool education', the government will use "part of a 40 million Euro loan from the European Bank for Reconstruction and Development (EBRD)". Another problematic example is the range of activities that have to be funded from local municipality budgets, without concrete indications of amounts. In contrast, in the very same action plan, a financial plan for the priority area 'Health' is provided by the Ministry of Health, which is very concrete in terms of figures and timeline. It was developed within the implementation of the Decade of Roma Inclusion National Action Plan.

In terms of determining the percentage of the Strategy to be covered by EU funding, the NRIS has very limited information on using EU funds for Roma inclusion. The NRIS fails to describe how EU funds will be better used for Roma inclusion; to fulfil the criteria set by the EU framework and quoted by the draft EU regulations; to describe how to make existing EU funds more accessible for Roma inclusion projects; make greater use of technical assistance; increase the duration of projects; ensure that the various EU funds available work together in a more integrated and flexible manner in the future; assess results; use global grants; or explain the use of ERDF for housing. Furthermore, there were no specificities on a process to facilitate access to EU funding.

Czech Republic

The Czech Concept does not contain a budget for either the individual tasks or the whole. The sources of funding to support the realisation of these tasks are not properly indicated. There is mention only of the need to create new or expand existing subsidy programmes for some goals and tasks, but the scope is not stated. Neither the Concept nor the Action Plan contain concrete references to EU structural funds, such as the European Regional Development Fund (ERDF) and the amendment of Article 7. There is no budget allocated for the Strategy nor is there a process foreseen to facilitate access to EU funding.

Denmark

There are budgets allocated within the Strategy. From 2012 to 2016, a total of 20 million Danish Kroner (approximately 2.7 million Euro) has been allocated to provide financial support for initiatives concerning promotion of active citizenship and combating discrimination. This funding is allocated as government and EU funding. It is unclear what the amount and percentage of EU funding is to be for this. The EU funding is facilitated through the Danish Structural Fund Programmes 2007-2013.

Finland

For the promotion of Roma equality, there is a fixed allocation of 3 million Euro foreseen in the state budget as a state grant to municipalities for the development of support measures and services. There is no other specific information about the allocation of money in the Strategy, but the Strategy was

followed by a Government decision in 2010, which stated that each Ministry has a budgetary responsibility to carry out the Strategy in their sector. So far, the Ministries have provided the allocations more or less as planned. It was not possible to assess what percentage of the Strategy is planned to be covered by EU funding. It does not seem as if there is a process foreseen to facilitate access to EU funding.

France

There is no specific budget allocation for the French Strategy. Budget lines exist within core ministries to cover specific measures directly. There are also national calls for proposals. The actions described are financed either through Central Ministries, regional authorities or municipalities. In the latter cases, a number of substantial projects are developed or envisaged with co-financing by Structural Funds. The Strategy does not refer to specific percentages covered by EU funding. But there is a process foreseen to facilitate access to EU funding. The French government envisages privileging the use of the European Social Fund (ESF) for the dissemination of good practices and innovative programmes.

Germany

There is no specific budget allocated for the German NRIS. The Federal Government's Commissioner for Culture and Media gives financial support of 1.77 million Euro to the Central Council of German Sinti and Roma and the Cultural and Documentation Centre, which provides information about the history and culture of the Sinti and Roma. This is in order to preserve and further develop their culture and to protect their identity. The Strategy does not refer to EU funding.

Hungary

There are budgets allocated for the Strategy. Most of the planned measures are based on EU funds: out of 61 measures, 31 will be solely financed by EU funds, and another 5 will be partly financed by EU funds. In most cases EU funds mean ESF (Social renewal operational programme). Two planned measures contain larger amounts of funds, both in the field of employment: one for finishing primary school and vocational training (20 billion HUF, 65 million Euro), another for wage subsidy, etc. (60 billion HUF, 195 million Euro), both financed by EU funds. The contribution of the national budget is minimal.

The Strategy calls for a more effective use of EU funds. However, it fails to make suggestions for the use of existing options, e.g. implementation of longer term projects, use of simplified cost options, global grants, technical assistance, ERDF for housing, etc.

There is no process foreseen to facilitate access to EU funding. The Strategy fails to describe how existing EU funds can be made more accessible for Roma inclusion projects. This failure is probably attributable to the government's unwillingness to make binding provisions at this stage when neither the EU rules nor the main national goals are set for the 2014-20 period.

Italy

Insufficient figures and numbers are given and the exact amount is not indicated. However, several projects are funded by the ESF, the European Regional Development Fund and the European Fund for the Integration of Third Country Nationals.

Latvia

There is no specific budget allocated for the Strategy. The budget line is within core ministries to cover specific measures directly through national calls for proposals and other funding options, such as ESF, Norwegian funds, Progress, etc.

There is no indication of the exact amount needed to implement the Strategy nor is there any budget estimation. Each indicator proposes the source of funding; in more than 50 per cent of the cases, the

funding shall be used from ESF. Not surprisingly, there is a process foreseen to facilitate access to EU funding. As a part of building capacities of Romani NGOs, there is also a focus in terms of accessing funds.

Netherlands

There is no specific budget allocated for the Dutch Strategy, but there is a compensatory policy for disadvantaged primary school pupils. Municipalities receive 260 million Euro in government funds for this purpose every year. Over the next few years, a further 100 million Euro will be invested in preschool education, bridging classes and summer schools. Approximately 400 million Euro a year is available for children whose parents have a low level of education. Some of the budget has already been allocated. Reference to an additionally planned budget was only made for education activities. The planned process is also unclear. The percentage of the Strategy to be covered by EU funding is not specified. There is no process foreseen to facilitate access to EU funding.

Poland

There are budgets allocated for the Polish Strategy. The actions implemented as part of the Programme are financed from the specific state budgetary allowance for the integration of the Roma community. The annual allocation amounts to PLN 10 million (approx. 2.5 million Euro – this also covers educational tasks, the implementation of which is the Programme's priority). Moreover, PLN 700 thousand (approx. 175,000 Euro) from the state budget managed by the Ministry of National Education is spent annually on textbooks for Roma students. The implementation of various projects is also financed from local governments' own resources. Moreover, funds for incentive scholarships for gifted Roma students (since 2011 – at all levels of education) are also granted annually. No changes in the financing structure for the Programme for the Roma community in Poland are foreseen for 2012-2013.

Apart from the aforementioned activities, the Polish legal system provides for another permanent budgetary mechanism which allows for the financing of additional educational tasks undertaken for the benefit of Roma students. This mechanism comprises the so-called increased educational part of the general subsidy, which local governments are granted for educational tasks addressed to students representing national and ethnic minorities. Annual funds earmarked for the financing of activities to support Roma students are by 150 per cent higher than the funds earmarked for the support of non-minority students (example: education of an average school student in Poland was supported from the state budget with approx. PLN 4,700, i.e. approx. 1,175 Euro in the 2010/2011 school year, whereas education of a Roma student was supported by approx. PLN 11,750, i.e. approx. 3,000 Euro). These funds cover e.g. additional educational tasks, including speech therapy, remedial, compensatory and other special classes aimed at closing the educational gap experienced by such students. This mechanism is also complementary to the Programme.

The budget allocation will be carried out according to national calls for proposals. There is support planned for Roma integration activities from the European Funds. In 2007, due to the large scale of needs of the Roma community and owing to the efforts made by the coordinating entity, the activities for the benefit of the Roma people covered by the Programme were granted support from the European Social Fund for the Human Capital Operational Programme (Submeasure 1.3.1 Projects for the Roma community – contest projects). The allocation for the "Roma component" for 2007-2013 amounts to 22 million Euro. This component has been designed as complementary to the governmental Programme. So far, 50 project co-financing agreements have been signed as a result of contests organized as part of sub-measure 1.3.1; the total value of the projects amounts to PLN 39 million (nearly 10 million Euro). The vast majority of these projects comprises pro-employment and pro-education activities addressed to members of the Roma community. The proposal to employ people of Roma origin in governmental structures, referred to in the European Commission's document, has been implemented since the beginning of the Programme's operation. As part of this activity, local

governments employ educational mediators (at the moment, approx. 100 people are thus employed). There is no process foreseen to facilitate access to EU funding.

Rules on how to apply for funds are very strict and often the Roma organisations do not have the capacity to apply within the rules set. Generally, only experienced NGOs can take advantage of the Programme.

Portugal

There are budgets allocated for the Strategy. Financial support is allotted for: a) at least 8 projects of civil society (amount not available); b) at least 6 projects of civil society that raise awareness and promote Roma history and culture; and c) housing programme (funded by ERDF, amount not available). The budget allocation is based on EU and national funding. The percentage of the Strategy covered by EU funding is not specified. There is no process foreseen to facilitate access to EU funding.

Romania

The information on budgeting is incomplete in the Romanian NRIS. It is difficult to discern any coherent overall sense of NRIS budgeting. For some measures there are specific budgets, but the sources for many other measures are indicated in general terms, without any figures for the state budget, structural funds, etc.

Slovakia

There are budgets allocated for the Strategy, a description of which is quoted from the Strategy below:

“The revised National Action Plan for the decade of Roma Inclusion 2005 – 2015 for the period 2011 – 2015 adopted by the Government Resolution No. 255/2011 contains partially defined funding for several measures. The indicative amount covering the implementation of action plans is set at almost 142 million euro out of the state budget, including EU Structural funds and the Cohesion Fund. The funds defined are covered by the state budget except for tasks which are in the purview of the Ministry of Education, Science, Research and Sports of the Slovak republic in implementing measures (Education: 1. 3; 2. 2; 2. 6 and 2. 7. 3) where the additional (not covered) estimated impact on the budget is estimated at 4 100 000 euro in 2013 and 7 100 000 euro in 2014 respectively. Expenditures not covered by the budget in the period 2013 – 2014 will be addressed alternatively including the reassessment of the department priorities. Table detailing impacts on the budget of public administration in the frame of the Revised National action Plan for the Decade of Roma Inclusion 2005 – 2015 for the period of 2011 – 2015 is listed in Annex No. 3.”

Percentages of the Strategy to be covered by EU funding are not specified (see details above), but there is a clear section on current and forthcoming EU funding possibilities. Considering the long-standing absorption capacity issues, these sections are about how things ‘ought to be’. The analysis is clear, as are the general options about what could be done but there are no clear plans. There is a need to revise the comprehensive approach for marginalized Roma communities in line with the Common Basic Principles, including explicit but not exclusive targeting.

The Revised National Action Plan of the Decade of Roma Inclusion for years 2005 – 2015 has partially defined financing (Annex 2 of the Strategy). The financial allocations are from the state budget as well as from the structural funds and the cohesion fund of the EU. The information provided about funding of activities comprised in the Action Plan is divided by relevant ministries not by specific activities. This information relates to the coming three years and is very general and incomplete. Civil society expressed doubts persist regarding completeness and accuracy of financial data provided, and therefore found it ‘difficult to assess the adequacy of the financial calculations presented’.

Slovenia

There are budget allocations for certain measures (e.g. no budget has been outlined in the area of housing) and has amounts that have been allocated only cover a limited period (until 2014-15). The budget line allocation is placed within core ministries to cover specific measures directly. Some measures indicate that parts of the funding are to come from the EU, but the amount is rarely indicated. There is no process to facilitate access to EU funding.

Spain

There is no specific budget allocated for the Strategy in Spain. However, the actions described are financed chiefly by regional authorities, and to some extent also by central government Ministries and municipalities. Projects are being developed and envisaged with co-financing by Structural Funds.

The Strategy does not refer to specific percentages covered by EU funding. However both short- and medium-term actions are planned to facilitate access to EU funding. Short-term actions include: Analyse together with autonomous communities and foster, via operational programmes, the use of the ERDF in accordance with the possibilities offered by Article 7.2; strengthen, under the ESF, the amount of funds dedicated to Roma from both the Anti-Discrimination operational programme (through its re-programming) and from regional OPs; strengthen the transnational aspect during 2012-2013; and create and circulate methodological guidelines to programme actions in benefit of the Roma for the future programming period. Medium-term actions in the next programming period include: intensify actions for Roma with ESF support, in line with the proposals of draft regulations to dedicate 20% of funds to the fight against exclusion; align the Partnership Agreement and future OPs with the EU2020 Strategy / NRP; study the advisability of mechanisms that offer future regulations in order to strengthen investment in Roma, specifically joint action programmes using various funds, large scale projects, the use of subsidies and the use of technical assistance. In this regard, an inter-fund committee is planned for development (ESF, ERDF, EAFRD) focused on the use and follow-up of Structural Funds in actions benefiting Roma.

Wales

There are budget allocations for the Wales Strategy. Throughout the document, the Framework mentions funding allocated in the form of grants to the areas of housing and education as well to the promotion of mutual understanding. However, as the Framework does not provide a general overview of the global budget (and funding lines) allocated for the delivery of the actions foreseen, we do not have information about the global amount available (it is possible that there are other budgets available but not mentioned).

Funding is foreseen through calls for proposals managed by the Welsh government. Specifically, in the area of housing, money in capital funding is available to local authorities through the Gypsy and Traveller Refurbishment Grant and the Gypsy and Traveller New Sites Grant. In the area of education, there is a specific grant for the education of Gypsy and Traveller children. Local authorities can use the Community Cohesion Fund 2009-2012 for actions related to mutual understanding. The percentage of the Strategy planned to be covered by EU funding is not specified. There is no process foreseen to facilitate access to EU funding.

Coordination Mechanisms in Implementing the NRIS

Countries gave varying responses in regard to recommendations to establish coordination mechanisms between horizontal and vertical actors at national level – with clear lines of responsibilities and accountability – particularly regarding the role and mandate of a national contact point for Roma integration.

Austria

Austria is planning to establish a platform for debate and exchange involving various stakeholders with the objective to monitor the implementation of the NRIS. No further information is given on the administrative structures responsible for implementation, monitoring and reporting. The contact point is the Bundeskanzleramt.

Bulgaria

The current NRIS in Bulgaria includes information on the national contact point including contact details; however, it does not contain information regarding its mandate to coordinate the development and implementation of the Strategy. The National Council for Cooperation on Ethnic and Integration Issues is the administrative unit responsible for the implementation of the NRIS, as well as the Action plan of the Decade of Roma Inclusion. This unit does not have the necessary capacity and experience to coordinate and implement Roma integration policies. It needs technical assistance in terms of implementing integration policies effectively. At this point there is also only one Roma member in the team, which is far from sufficient. Overall, the coordination mechanism foreseen does not seem adequate.

In terms of responsibility, the NRIS does not explicitly oblige the regional and local authorities to take active part in the implementation of the Strategy. It does delegate responsibilities to local authorities within the Action Plan, however, without any concrete financial indications. In the section on the mechanisms for implementation of the integration policy, the government extends recommendations to the local authorities to develop local action plans for the implementation of the NRIS. However, they do not have a mandatory or binding character.

Czech Republic

Since the Roma Integration Concept was formulated before the task of drawing up an NRIS was assigned, there is no indication of a contact point. The primary author of the Concept was the Governmental Council for Roma Minority Affairs (RVZRM), thus it can be assumed that this advisory body to the Office of the Government will also be the main contact point. The coordination mechanism does not seem adequate. The mandate of the Government Council for Roma Minority Affairs was strengthened in 2010 with a change to its statute, expanding its ranks to include the Prime Minister and the ministers of the individual ministries, representatives of the Association of Regions of the Czech Republic and instituting closer cooperation with the Agency for Social Inclusion in Roma Localities. Despite this, the Council's mandate remains relatively weak. The Government Council is not an authority that could enforce fulfilment of individual measures and potentially issue sanctions for the failure to do so.

In March 2010, the post of Minister for Human Rights was abolished after three years. Since then the human rights agenda has once again fallen under the jurisdiction of the Commissioner for Human Rights. Due to austerity measures in the government budget, 2010 also saw a reduction in jobs and the budget of this body. The result is a considerably limited capacity, which in some regards has had a paralysing effect. The Government Council for Roma Minority Affairs is and for the near future will be limited to a consultative and reporting role, with no aspirations to coordinate activities or oversee their implementation.

Implementation and monitoring the fulfilment of individual tasks runs up against the legislative limits to the powers of the Government Council for Roma Minority Affairs, which does not have sufficient jurisdiction in relation to the ministries, regions and municipalities. The fact that the individual tasks are not specified in terms of content affords regions and municipalities a large degree of discretion when it comes to fulfilling the tasks and makes it impossible to establish proper indicators.

The Action Plan (Concept Implementation Plan) contains tasks for individual departments and recommendations for other key entities in Roma integration. The Implementation Plan organises the individual tasks for meeting the Czech Concept goals by those who are to implement them – the ministries. Specification of individual tasks is not laid out in detail in the Implementation Plan. Establishing concrete measures is the responsibility of the individual ministries. This, however, is a weak point of the Concept, which does not set clear and definitive conditions for forcing the individual implementers to meet their commitments.

Denmark

The structure and mandate of the national contact point is unspecified in the NRIS. The foreseen coordination mechanism does not seem adequate because no coordination mechanism is even mentioned. The following issues are not specified in the NRIS:

- How to ensure the implementation of the NRIS by line ministries;
- Who is responsible for implementation on the ground; and
- How implementation at the regional and local level is ensured.

The communication channels are also somewhat unclear in the Strategy document. Communication channels between both horizontal and vertical actors are only mentioned as part of the “normal procedures” (p.14).

Finland

Prior to the EU Framework, no body was named as a national contact point, but since December 2011, the Ministry for Social and Health Affairs’ senior expert has been named as the contact point. Prior to this, the National and Regional Advisory Board on Romani affairs (established already in 1956 and located within the Ministry for Social and Health Affairs) has had a key coordination role. A coordination group to follow-up and monitor the implementation of the NRIS with a large representation of national and local authorities and Roma NGOs will be established in March 2012.

The Strategy foresees responsible and contributing bodies and proposes to increase the number of experts working on Roma inclusion. The coordination mechanism to be established in March 2012 is adequate, with broad-based participation, including a large number of Roma organisations and both national and local level authorities. About 50 per cent of the foreseen members of group are of Roma origin.

Different ministries have been appointed to be responsible for implementation in the different areas at the national level:

- The Ministry of Social Affairs and Health and Ministry of Education are responsible for education and promotion of Romani language and culture;
- The Ministry of Employment and Economy, Ministry of Environment, and Ministry of Interior are responsible for employment;
- The Ministry of Social Affairs and Health, the Ministry of Environment, the Housing Finance and Development Centre of Finland, the Ombudsman for Minorities, the Ministry of Interior, and the Ministry of Justice are responsible for welfare and housing;
- The Ministry of Interior is responsible for non-discrimination;

- The responsible bodies are supported in their tasks by contributing bodies, such as ministries or regional administrations and municipalities.

Regional and local authorities are directly involved in the implementation and there is an official regional advisory board in four regions, which are to be represented in the coordination group. The national advisory board communicates nationally, and the regional advisory boards communicate with local actors.

France

The national contact point is the Minister of Social Affairs. No further information is provided on its structure and mandate.

The foreseen coordination mechanism seems adequate. Territorial coordination features quite prominently in the Strategy, involving various public bodies (Défenseur des Droits, National Advisory Committee on Travellers (CNCGV), National Council of Policies against Poverty and Social Exclusion (CNLE), National Observatory on Poverty and Social Exclusion (ONPES)), some of which are independent. The effectiveness of coordination mechanisms is arguably facilitated by the relatively (taking into account the decentralisation efforts of the past couple of decades) top-down, centralised form of the French administrative system.

Line ministries and the Conseils Généraux (General Councils, elected assemblies of the French departments) are generally responsible for the design and implementation of measures in the four strategic areas (employment, education, healthcare, and housing). The French government confirms the State's commitment to the Strategy, but emphasises that the latter cannot be implemented by the State alone. The document states that, given the nature of nomadic or semi-itinerant lifestyles, and given the precarious situation of a significant part of the Traveller population, the State continues to provide funding for social facilities benefiting Travellers and Roma. However, its action is purposely linked closely with the local authorities including the General Councils (conseils généraux), which retain the competence of law in regard to social support. Implementation of specific measures is ensured in many cases through the transmission of so-called *Circulaires* (Ministerial or inter-ministerial Circulars) to the departmental Prefects and through them onto the municipal administrations.

The ultimate responsibility of implementation of the NRIS lies with the central government and the departmental General Councils. The document does not state *how* the implementation is ensured at the regional and local levels. It merely describes the responsibility of the General Councils and of the relevant services of municipalities in the implementation of the Strategy. The State finances regional and local administrations and services but also provides financing to the action on the ground of an array of local civil society associations, especially in the provision of legal support, access to rights and benefits, professional integration and the fight against discrimination and exclusion of Travellers. The document also mentions health mediation initiatives implemented by NGOs and financed by the Central Health Ministry. The government emphasises that the government considers NGOs consulted on 25 January (see below) as key partners in the implementation of the Strategy.

The Strategy does not describe communication channels. However, the government made an effort to obtain vertical feedback by consulting municipalities on a draft of the National Strategy on the 6th of January 2012, and civil society organisations on the 25th of January 2012 through two advisory boards. In relation to education and the transition between formal schooling and the labour market, Partnership Platforms between stakeholders in education, training and labour insertion are organised throughout the French territory to find solutions for school leavers without a diploma and prepare them for their entry into working life. The government is also commissioning studies and it plans to communicate the proposals that emerge from them. For example, the National Advisory Committee on Travellers (CNCGV) is charged, in collaboration with the Ministers for Social Affairs and Housing, to

study the specific problems faced by Travellers and make proposals to improve their integration into the national community. The government commissioned a study from the National Council of Policies against Poverty and Social Exclusion (CNLE) and the National Observatory on Poverty and Social Exclusion (ONPES).

Germany

There is no specific mention of a national contact point for the implementation of the Strategies or of the respective coordination mechanisms. In general, the Commissioner for Ethnic German Immigrants and National Minorities is the point of contact for all the interests of national minorities.

Hungary

As regards the coordination mechanism, the contact point is the State Secretariat for Social Inclusion within the Ministry for Public Administration and Justice. The government decision on the approval of the Strategy and the action plan designates the Ministry responsible for the coordination of annual reporting on the action plan's implementation, and for the revision of the action plan every second year. Internal rules of the Ministry may designate the State Secretariat for these tasks.

This foreseen coordination mechanism does not seem adequate. In light of the raft of recent important government policies and decisions, which clearly do not reflect the equality agenda of the Strategy, casts doubts as to the political power and capacity within the responsible Ministry to coordinate the implementation of the Strategy.

Institutions responsible for the implementation of mechanisms are described in the Strategy, e.g. Inter-Ministerial Committee for Social Inclusion and Roma Affairs, Roma Coordination Council, by means of annual reports to the government. This is important and useful, but more details are needed on reporting, e.g. the ways by which to channel in civil society and expert views, publicity, etc. in order to create mechanisms that work.

In addition, the Strategy does not give a clear definition of the role of regional and local authorities, which can be explained by the fact that the role of territorial levels is currently undergoing significant changes in Hungary (e.g. schools and hospitals will be operated by the state).

Italy

For the first time an inter-ministerial approach will be adopted for Roma issues. The Ministries involved will be:

- The Ministry of Cooperation and Integration
- The Ministry of Interior
- The Ministry of Employment, Social Affairs and Equal Opportunities
- The Ministry of Health
- The Ministry of Education
- The Ministry of Justice

However, insufficient details are given on the specific responsibilities of each Ministry or authority.

Several roundtables between the ministries are planned as well as fora with Roma communities. Also, autonomously administered projects have been planned at the regional level with EU funding (mainly in southern regions).

With regard to implementation it is stressed that the overall strategy will be mainly implemented through:

- Prevention and fight against discrimination
- Creation of a national contact point

- Cooperation with civil society
- Stronger field work on the whole national territory
- More information and awareness-raising campaigns
- Statistical research, studies, surveys
- Stronger monitoring systems

However, it is not specified how this will be carried out.

Latvia

The mandate of the national contact point is not clear from the Latvian NRIS. The body responsible for Roma integration in Latvia is based in the Ministry of Culture. Despite the fact that the Ministry of Culture is responsible for implementing, monitoring and evaluating Roma integration policy, it also ensures the work of the Consultative board at the national level on Roma integration policy. The Guidelines and measures set up therein provide responsibility for sectorial ministries, which are named in the NRIS. The coordination mechanisms foreseen seem adequate.

Line ministries are responsible for the implementation, based on Guideline operational tables. It seems that the Guidelines are approved by the Cabinet, though it is not clear from the NRIS whether the line ministries are then obliged by this decree to ensure implementation.

Due to the decentralisation of responsibilities, there is no real responsibility over the implementation of the Guidelines, but proposals in the NRIS include policy tasks and measures to be implemented by local authorities. For example, information materials on “National identity, civil society and integration policy guidelines and target groups: theory and good practice” have been developed for local authorities. In addition there are plans to establish a system of civil society strengthening and society integration regional coordinators, and it is anticipated that there will be one regional coordinator in each of the five planning regions in Latvia. The communication channels rely on the Consultative board and regional coordinators. There are also more consultative bodies mentioned in the text such as one at the Ministry for Education.

Netherlands

There is no mention of a national contact point in the NRIS. The foreseen coordination mechanism does not seem adequate. The role of the central government is to acknowledge the urgency and severity of the problems faced by Roma, but there is no information provided about ensuring the implementation of the NRIS by line ministries.

The primary responsibility for dealing with “the problems of the local Roma population” (p.2) lies with municipalities. Municipalities are encouraged to make effective use of existing measures and the tools available to deal with problems within certain segments of local Roma communities. The Roma community itself also has a crucial role to play, and emphasises the importance of contact at local level. The communicational channels between both horizontal and vertical actors are not specified.

Poland

As regards establishing a coordination mechanism between horizontal and vertical actors at national level – with clear lines of responsibilities and accountability, the Programme had previously been coordinated by the Ministry of Interior and Administration. On 18 November 2011, the Ministry underwent a restructuring process, as a result of which the Ministry of Administration and Digitization was established. The latter is now responsible for national and ethnic minority issues. The Ministry of Administration and Digitization includes a Department for Religions and National and Ethnic Minorities, which encompasses a Roma Minority Section. This Section acts as the national contact point. There is no independent national contact point foreseen.

Overall, the foreseen coordination mechanism does not seem adequate. Although there is a Joint Council of Roma representatives, which cooperates with the Department for Religions and National and Ethnic Minorities, they do not really coordinate the Programme. The local authorities coordinate actions in their own regions. Roma involvement in the coordination is often non-existent on the local level.

The Ministry of Internal Affairs and Administration has the main responsibility for implementing the Programme and allocating funds in cooperation with the regional municipalities. Implementation of the Programme is carried out at the regional level by province governors (representatives of the Council of Ministers in 16 provinces, according to the administrative division of Poland). All problems which appear in the course of the Programme's implementation and are notified by the beneficiaries (local governments, province offices, mediators, the press or even natural persons), are monitored, reviewed and solved on an ongoing basis by respective province governors, the Ministry of Administration and Digitization, and the Racism and Xenophobia Monitoring Task Force operating as part of the Ministry of Interior, the Government Plenipotentiary for Equal Treatment, or during the meetings held by the Roma Task Force operating as part of the Joint Committee of the Government on National and Ethnic Minorities. There are no specific communication channels set.

Portugal

The Portuguese national contact point is ACIDI (*Alto Comissariado para a Imigração e Diálogo Intercultural* - High Commission for Immigration and Intercultural Dialogue), which maintains an interdepartmental structure of support and consultation for the government on issues of immigration and ethnic minorities. Its mandate is to collaborate in the design, implementation and evaluation of public and transversal policies for the integration of migrants and ethnic minorities, as well as promoting dialogue between cultures, ethnicities and religions.

The foreseen coordination mechanism seems adequate. A Consultation Group for the Integration of Roma Communities will be created and coordinated by ACIDI, composed by representatives of several ministries, public entities, civil society and Roma communities. Its mission is to coordinate the NRIS and to follow the integration of Roma communities in general. Implementation of the NRIS is ensured by the following ministries and bodies:

- ACIDI is responsible for some transversal activities and priorities, including: citizenship education, Roma history and culture, and gender equality;
- The Health Ministry (*Direcção Geral de Saúde*) is responsible for health related priorities;
- The Ministry for Prison Services and Ministry for Reinsertion (*Direcção Geral dos Serviços Prisionais e Direcção Geral de Reinserção*) is responsible for justice and safety related priorities;
- The Education Ministry (General Direction for Innovation and Curricular Development - *Direcção Geral de Inovação e Desenvolvimento Curricular*) is responsible for education related priorities;
- The Secretary of State for Parliamentary and Equality Issues (Commission for Citizenship and Gender Equality - *Comissão para a Cidadania e a Igualdade de Género*) is responsible for gender equality priorities;
- The Institute of Housing and Urban Rehabilitation (linked to the Ministry for Environment, Territory and Regional Development - *Ministério do Ambiente, do Ordenamento do Território e do Desenvolvimento Regional*) is responsible for housing priorities;
- The Institute for Social Security (*Instituto da Segurança Social*) is responsible for social security related priorities; and the
- The Institute for Employment and Professional Training (*Instituto do Emprego e Formação Profissional*) is responsible for training and employment priorities.

The implementation of actions is to be ensured through the establishment of partnerships at the local level with representatives of Roma communities and other local actors.

There is not enough information available in regard to the communication channels between both horizontal and vertical actors specified in the NRIS to comment on this. The NRIS states that horizontal and vertical actors (wide group of partners) will communicate via the presentation and the discussion of an annual progress report with the possibility to present additional reports whenever appropriate.

Romania

The national contact point will be the Central Department for Monitoring and Assessment, which will coordinate the monitoring and evaluating activities of the Strategy. The Central Department for Monitoring and Assessment will be led by a state councillor and include the following members: the president of NAR, a representative of the monitoring and assessment offices from the Ministry of Administration and Interior, the Ministry of Regional Development and Tourism, the Ministry of Education, Research, Youth and Sport, the Ministry of Labour, Family and Social Protection and the Ministry of Health, as well as two representatives from the General Secretariat of the Government. There is no resource allocation for the NCP (or at least not in this document).

The foreseen coordination mechanism does not seem adequate. According to the explanatory memorandum of the Governmental Decision 1221 from December 14, 2011, which approved the Strategy of the Government of Romania for the Inclusion of Romanian Citizens belonging to the Roma Minority (2012-2020), consultations with the regional and local authorities should be organised by the National Agency for Roma with the support of the Ministry of Administration and Interior.

Slovakia

The Government of the Slovak Republic has charged the Office of the Plenipotentiary of the Slovak Government for Roma communities as the advisory body for the Government with the development of the Strategy for Roma integration up to 2020. The development of the Strategy required extensive consultations on the national, regional and local levels. International institutions such as the World Bank and the United Nations Development Fund (UNDP) participated in the development of the Strategy by supplying background data and expert analysis.

The Office of the Plenipotentiary of the Government of the Slovak Republic for Roma Communities (hereinafter "Office of the Plenipotentiary") will also play a key role in implementing the Strategy as a coordinator of individual activities and as the expert platform for assessing the suitability of individual instruments and policies. Its role will be to monitor the overall goal and to develop the Slovak Government's vision with respect to Roma. Within the implementation process, the role of the Office of the Plenipotentiary is to coordinate monitoring and analytical processes. Monitoring and the collection of data will be carried out in collaboration with the UNDP, the World Bank, Roma civil society and other partners. The status of the Plenipotentiary as an advisory body of the Slovak Government includes responsibility for drafting the interim and final analysis. The Office of the Plenipotentiary will publish an annual monitoring report detailing the implementation of individual measures. An evaluation report will be published every two years taking into account independent evaluation sources. Based on this evaluation, the Office of the Plenipotentiary will propose measures or amendments to the policies implemented.

With respect to international partners, the Office of the Plenipotentiary becomes a national contact point of the Strategy. It also plays communication and coordination role with respect to Roma and the EU Roma platform. Overall, the coordination mechanisms foreseen seem adequate.

Slovenia

The NRIS does not provide for a national contact point. It is difficult to evaluate the adequacy of the coordination mechanism on the basis of the Strategy only. Each measure is assigned to a responsible ministry. Local authorities are also involved in the implementation but there are no details regarding the coordination between the levels of government.

Each measure has different implementing bodies:

- Housing: Ministry of Environment and Spatial Planning, Government Office for Local Self-Government and Regional Policy;
- Education: Ministry of Education and Sport, Ministry of Culture, National Education Institute;
- Employment: Ministry of Labour, Family and Social Affairs, Employment Service of Slovenia;
- Health: Ministry of Health, Institute of Public Health Murska Sobota;
- Roma culture: Ministry of Culture, Ministry of Public Administration, Government Office for Local Self-Government and Regional Policy;
- Non-discrimination: Government Office for National Minorities; and
- Additionally, other ministries can assist with the implementation of the Strategy.

It is not specified how the implementation of the NRIS will be ensured at the regional and local level or who is responsible for implementation on the ground. It is also not possible to identify communication channels on the basis of the Strategy alone.

Spain

The national contact point is the Director General of Family and Childhood Services. The Directorate General of Childhood and Family Services is attached to the Ministry of Health, Social Services and Equality. This DG is in charge of coordinating Roma social inclusion policies throughout the Spanish State, and has a dedicated unit working in these areas.

The coordination mechanism foreseen seem adequate. The technical cooperation mechanisms between the central government, regional and local authorities, as well as civil society organisations within the framework of the NRIS include:

- The role of the Social Affairs Conference, which coordinates the policy process of central and regional authorities (i.e. Autonomous Communities), will be strengthened in order to intensify inter-institutional cooperation and implement joint measures.
- Information exchanges will be improved through the Special Committee of the National Social Inclusion Action Plan, and the follow-up committees co-financed by Autonomous Communities and the cities of Ceuta and Melilla; all affairs concerning Roma will be addressed under the framework of the Special Committee's duties, set by its directors.
- The operations of the Roma Technical Cooperation Group will be strengthened. The Group includes representatives of Central, Autonomous and Local Administrations (via the Spanish Federation of Municipalities [FEMP]) for mutual information exchange.
- In the State Council of the Roma People, the activities of the Working Groups will be pursued. The latter are formed by various ministries and associations and prioritise the key areas of education, employment, health and housing. Likewise, coordination will be encouraged with consultation and advisory bodies existing in certain Autonomous Communities regarding Roma-related affairs.
- Finally, plans are in place for the creation of an Inter-fund Committee, comprising representatives of the ESF, the ERDF and the EAFRD, with the aim of coordinating the programming, follow-up and review of activities focused on the Roma.

The decentralised governance structure of the Spanish state implies that the central government has exclusive competencies only in relation to certain areas. In relation to social and active employment policy, it generally establishes general guidelines, common frameworks and minimum criteria, while the planning, implementation and monitoring of relevant policies falls under the responsibility of Autonomous Communities and municipalities. The central government develops national plans and strategies like the NRIS, but always in consultation with Autonomous Communities since they usually are in charge of implementation. Regional authorities enjoy legislative and executive powers and have assumed exclusive competencies in the provision of services in the strategic areas of the EU Framework

for NRIS: education, healthcare, active employment policies and social services (see Arts. 148 and 149 of the Spanish Constitution). With regard to equality policy, the competencies of the central government include the implementation of anti-discrimination measures as well as the design, promotion and regulation of equality measures. In practice though, it has tended to restrict itself to the design, promotion and regulation of equality policy. In administrative terms, Autonomous Communities and municipal governments do have the competency to launch anti-discrimination and equality initiatives within their jurisdiction.

The Spanish government will rest on the aforementioned coordination mechanisms in order to ensure the effective implementation of the NRIS. The NRIS will be developed through the Action Plan for the Development of the Roma Population 2010 – 2012 and subsequent three year plans, in which measures and actions will be set out through participatory methods, with the participation of all Ministries and Autonomous Communities, as well as Roma organisations and social agents to contribute to the achievement of the NRIS's targets. The NRIS provides for the strengthening of the linkages between the NRIS, the National Action Plan and regional and local plans.

Wales

The Framework does not mention any national or regional contact point. The Framework mentions that the Welsh Government Equalities Minister, with the responsibility for Gypsy and Traveller issues in Wales, is committed to taking forward this agenda in cooperation with the services with responsibilities in relation to housing, education and health. However, it does not specify how it plans to do it in practice. The Framework covers only Wales so strategies to ensure the implementation by line ministries is not applicable. However, different government services will take the lead in Wales depending on the policy area covered by the objective, namely:

- Community cohesion: Equality Diversity and Inclusion Division
- Accommodation: Department of Environment Sustainability and Housing and Equality Diversity and Inclusion Division (depending on the measure)
- Education: Department for Education and Skills
- Engagement and participation: Equality Diversity and Inclusion Division
- Health: Department of Health and Social Services
- Consultation and engagement: Equality Diversity and Inclusion Division and Department for Education and Skills, Ethnic Minority Child Protection Branch.

The Framework mentions that there will be cooperation with the different actors (it explicitly mentions some of them) and refers to a number of forums and platforms in the different fields covered where relevant stakeholders can meet, exchange ideas and work together. However, it does not explicitly mention how it will organise the communication with and between stakeholders in practice (channels, tools, etc.)

Recommendations on Indicators and Monitoring

Austria

It seems that no research is used as a basis for the development of the Strategy despite the fact that the Strategy itself lists various research projects of different institutions on Roma in Austria.

Bulgaria

There are no indicators planned for monitoring implementation mechanisms and monitoring the Bulgarian NRIS. The greatest weakness of the current and previous integration policies conducted by the national governments in Bulgaria is the lack of mechanisms for collecting and disseminating disaggregated data. The only available instrument for official data collection is the national census, which does not provide data regarding Roma integration policies. Evidently there are a number of civil society organisations that provide data on the different priorities, however in most cases, the data and methodologies applied are not aligned and open to dispute. Overall, there are no indications as to how the national strategy will be implemented in Bulgaria. The annex that dealt with implementation and budgeting was withdrawn by the Council of Ministers.

There is a reporting system in the Bulgarian NRIS, but it remains problematic. The NRIS only provides the possibility for the so called “administrative monitoring”, which is the subject of annual reports by each and every institution engaged in the process of implementation. The experience to date is that such reports are prepared without any methodology for evaluation, and lack concrete indicators and mechanisms for collecting information related to outcomes of the integration policies.

Czech Republic

There is no clear guide for monitoring and evaluating integration mechanisms. The Concept does not contain any quantifiable indicators relevant to the target group in any of the chapters. Only in the area of education does the document refer to two studies by the Ministry of Education, but it does not work with freely accessible statistics or studies carried out by the private or non-profit sector whatsoever. Only the percentages published by a World Bank study from 2008 are provided in the chapter on employment. None of the other chapters (excess debt, housing, social protection, health care, safety) contain as much as an estimated percentage. Some of the proposed systemic measures can be considered indicators for fulfilling the Concept's implementation plan, but not as far as impacting the target group. Finally, because the Concept was developed prior to the Framework Communication, it is unclear what kind of reporting system is planned within the context of the Framework. There does not appear to be a reporting system, however, in the Czech Concept.

Denmark

There are no indicators planned for monitoring implementation. But there are indications on how the national strategies will be implemented. The responsibility for services design and delivery lies at the municipal level.

Research served as a basis for designing the NRIS, as some of the education policies were based on research studies on bilingual pupils' school performance (p.7 - cf. PISA Ethnic 2009). The importance of focusing on human trafficking was based on the findings of the Danish Centre against Human Trafficking that recommends a continuous focus and establishment of measures in this area (p.13).

There is no reporting system, but two annexes, which are only in Danish, were provided with the NRIS. It is possible that they provide some of the information not found in the NRIS and not included in this questionnaire, but they have not yet been translated into English and thus could not be reviewed.

Finland

There are indicators planned for monitoring implementation, but due to the lack of statistical data relating to the Roma, the monitoring of the realisation and results of the policy objectives will be based mainly on qualitative indicators and information gathering. This will include various questionnaires and surveys as information gathering methods. One of current projects relates to indicator development, to which funds have been allocated.

There are indications on how the national strategy will be implemented, but these indicators still need specification. Lessons could be drawn from:

- The expertise of the National Institute for Health and Welfare; and
- The indicators for the monitoring of discrimination.

Research served as the basis for designing the Finnish NRIS.

Within the Finnish NRIS, the monitoring system is divided into two areas:

1. Monitoring of the execution of the implementation; and
2. Monitoring of the realisation of the objectives.

Moreover, each administrative sector is to draw up a detailed implementation plan for the measures proposed in the Strategy. Each year a report on the implementation plan is to be submitted to the monitoring group.

France

There are no indicators planned to monitor implementation. The French government merely asserts that the monitoring of the policies presented in the Strategy will scrupulously respect the constitutional requirements recently identified in a decision of the Constitutional Council No. 2007-557 DC of 15 November 2007. Monitoring methods mentioned in the NRIS concern only the monitoring of the access to rights of persons in situation of poverty and exclusion, irrespective of ethnic origin. There are also no indications on how the national strategy will be implemented beyond the implementation mechanisms previously described. And finally, there is no reporting system. This is envisaged only under the mandate of actions co-financed by the ERDF and ESF.

Germany

There are no indications in Germany's NRIS on how the national strategies will be implemented, monitored, or reported upon. Instead it refers to already developed monitoring systems carried out by ECRI, CERD and FCN and abstains from establishing an additional monitoring system. It does not appear as if Germany referred to previous research as the basis for designing the NRIS.

Hungary

There are indicators planned for monitoring implementation. The chapter on the current situation uses available data. The Strategy has a separate chapter on the collection of data in the future, including ethnically disaggregated data.

Research served as the basis for designing the NRIS. A wide range of available and recognised research sources were used, which are cited in the Strategy.

A reporting system is also foreseen in the NRIS. The contact point is the State Secretariat for Social Inclusion within the Ministry for Public Administration and Justice. The government decision on the approval of the Strategy and the action plan designates the Ministry for the coordination of reporting on the implementation of the action plan annually, and the revision of the action plan every second year. Internal rules of the Ministry may designate the State Secretariat for these tasks.

Italy

The mechanisms that will be used for the monitoring of implementation are not specified in the NRIS.

Latvia

There are indicators planned for monitoring implementation. The Ministry of Culture will provide the Cabinet of Ministers with information on the implementing the Guidelines on two occasions during the operating period of the document: an interim assessment in 2015 and the final impact assessment in 2019, as well as with three information reports in 2014, 2016 and 2019 on implementing the action plan of the Guidelines. The plan also includes the creation of the Consultative boards and creating of the Regular and systematic monitoring policy. There are also indications on how the national strategy will be implemented. Overall, the indicators are realistic and seem feasible.

Research served as the basis for designing the NRIS. In Latvia, the Statistical office collects information on Roma and their status in society. Roma are registered in the Office for Citizenship and Migration Affairs. The government knows their housing conditions and the barriers they face in education. An important research used for the purpose of NRIS related in particular to Roma education.

Netherlands

There are no indicators planned for monitoring implementation, no indications for implementing the national strategies, nor reporting measures.

Poland

There are indicators planned for implementation. Monitoring is done mostly by the respective province governors, the Ministry of Administration and Digitisation, and the Racism and Xenophobia Monitoring Task Force operating as part of the Ministry of Interior, the Government Plenipotentiary for Equal Treatment, or during the meetings held by the Roma Task Force, operating as part of the Joint Committee of the Government and National and Ethnic Minorities.

It is difficult to determine whether actual research has served as the basis for designing the NRIS, since the same Strategy has being in place since 2003. By the end of 2013, the results will be used to create a Strategy for 2014-2024. These outcomes may count as “research” and apply to the future Strategy.

There is a reporting system. Each year, a report is prepared by the Ministry of Interior and Internal Affairs. So far, the results presented are unsatisfying. There has been some improvement in education and housing of Roma, but problems in regard to employment and education continue. Negative attitudes among the mainstream society also persist. The 2010 survey shows that 47 per cent of Poles do not like Roma. Finally, according to the Ministry of Interior and Administration, the unemployment rate among the Roma community in 2009 was 97 per cent, 99 per cent in Kujawsko-Pomorskie Voivodeship and the lowest 60 per cent in Mazowieckie Voivodeship.

Portugal

Clear indicators are given by measures planned (see table pp.45-68). Most are quantitative indicators. The implementation seems feasible for the following reasons:

- A national transversal study will be carried out to collect relevant information on the socio-economic situation of the Roma for the design and implementation of policies adjusted to the situation of the Roma communities and to support implementation;
- Partnerships will be established at local level for the implementation of the actions; and
- Responsible partners are assigned to different areas of the implementation.

In addition, the NRIS foresees the presentation and the discussion of an annual progress report within the wide group of partners with the possibility to present additional reports whenever appropriate.

Romania

There are no indications on how the national strategies will be implemented. Even though “measuring the degree of the Roma minority’s social inclusion” is stated as an important component, it is not clear how this will be put into practice. The support and real involvement of civil society is at the core of the monitoring mechanism of the Strategy, but there is no clear reference to how this should work. The monitoring mechanism is only presented as a general guideline for what is supposed to happen at the central and county level, without any specific indication. The inter-institutional system for communication and monitoring has not yet been established, nor is there any reference to how the NGOs will be involved in this system. There is also not a clear idea as to who will be responsible for carrying out the impact study of the Strategy following each period of implementation of the measures.

Slovakia

There are indicators planned for monitoring implementation. The Strategy does not operate with year to year indicators. In general the indicators are very weak and will not enable effective measurement of all the presented goals. It must be said that in comparison to other NRIS, some ‘smart’ indicators are in place, for instance, in education. The cooperation envisaged with UNDP, the World Bank and the Open Society Foundations augurs well for a more compelling set of indicators to be in place within the first year of the Strategy. There is a detailed section on implementation, outlining the roles of the Plenipotentiary, ministries, local self-governments, civil society. On paper it seems feasible. In practice, only time can tell.

The drafting team has also drawn upon data and findings from the 2011 UNDP/World Bank Roma household survey so as to support evidence-based policy recommendations, and has benefited from consultations with World Bank staff on priority areas and M&E.

There is a reporting system, but it has yet to be confirmed: "We expect an annual monitoring process and, once every two years, an evaluation and update of the plan of activities and of policy measures defined in the Strategy of the Slovak Republic for Roma Integration up to 2020."

Slovenia

For each measure there are qualitative or quantitative indicators but they seem to be too vague. The implementation bodies are identified but there are no details as to how the implementation of the national strategy will be carried out. Research did not serve as a basis for designing the NRIS. A Special Government Working Commission has been appointed to follow the implementation of the NRIS. The Commission, on the basis of reports from individual state authorities, self-governing local communities, Roma Community Council, and other state authorities, has to prepare an implementation report on an annual basis and submit it to the Government. The Government has the obligation to submit a report on the implementation of the NRIS every year to the National Assembly.

Spain

There are indicators planned for monitoring implementation in the Spanish NRIS. The NRIS uses the principles of good governance as indicators for monitoring implementation: openness, participation, responsibility, efficiency and coherence.

The NRIS also includes indications on how it will be implemented. The implementation of the NRIS will take place through the three-year National Action Plans for Roma Development, implemented in Spain since 1989. The implementation and coordination mechanisms seem appropriate with regard to Spain’s decentralised governance structure.

The design of the Spanish NRIS was based on the following studies:

- The socio-demographic study carried out by the Centre for Sociological Research (CSR) in 2007, which will be repeated.
- The Spanish National Health Survey for Roma, which is also expected to be repeated, and its comparative study with the Spanish National Health Survey for the general population.
- The employment study carried out on two occasions on indicators compared with the Active Population Survey (APS), which is due to be repeated.
- The Roma Housing Map in Spain, which provides comparable data on results from previous maps, is due to be repeated.
- Studies carried out on education will provide data for diachronic analysis, as well as the comparison of indicators of the State System and indicators of the Ministry of Education.

The reporting system will rest upon the replication of aforementioned studies, which shall be carried out in two phases: one prior to 2015 to provide data on the degree of success of mid-term targets, and another in 2020, which will collect information on final results. The results of these studies will be used to draft two target achievement follow-up reports, a mid-term one after 2015 and the other upon the completion of the Strategy in 2020.

Wales

The Framework does not mention any formal monitoring of the implementation. Therefore there are no specific and precise indicators mentioned.

The delivery plan foreseen in the Framework could be useful to a certain extent to monitor the implementation of the objectives set. The delivery plan includes the 17 objectives set and elements related to its implementation (including the leading department, the specific actions to be undertaken and in some cases the timescale). However, it would be useful to have more precise information on the specific actions (e.g. deadlines for implementation, specific targets to be achieved, etc.) in order to do a more accurate monitoring.

Research did serve as the basis for designing the NRIS. A wide range of research, surveys and analysis and other background material are mentioned for the different areas covered by the Framework. The Framework does not mention any formal reporting system.

Part 2: Analysis of Stakeholder Surveys

Aim and Methodology

The ERPC developed and published a 16 question survey at the end of 2011⁴ with the aim of obtaining data from Roma and civil society organisations regarding their views about the National Roma Integration Strategies (NRIS). The survey was disseminated electronically to a wide audience throughout the EU and beyond by relying on the mailing lists of ERPC members and affiliates. Respondents were invited to participate in the ERPC survey during the month of January 2012. The survey was completed by 326 persons, among which 90 provided substantial detailed responses.

A majority of the respondents represented Roma (or Traveller) NGOs (37) and pro-Roma NGOs (16). A substantial amount of answers also came from human rights NGOs (15) and academic institutions, universities or research institutes (5). Other responses came from a variety of stakeholders, including equality bodies, international organisations, regional/local authorities, foundations, and faith-based and anti-racist organisations.

The ERPC gathered 78 responses from EU Member States, covering almost all Member States with the exception of Austria, Cyprus, Estonia and Latvia. 12 responses came from candidate and neighbourhood countries (Turkey, Moldova, Russia, Croatia, Serbia, Ukraine, FYROM, BiH, and Kosovo). Despite the wider range of respondents, the analysis described below is relative to just the EU Member States and can be considered representative.

The countries with the highest number of participants to the survey included: Romania (12), the United-Kingdom (9), Spain (7), and Bulgaria and Germany (5 each). We also received 4 answers from each of the following countries: France, the Netherlands, Portugal and Slovakia.

Submission of National Roma Integration Strategies to the European Commission

At the time of the survey (4-31 January 2012), not all of the Member States had submitted their NRIS to the Commission. 21 Member States submitted their NRIS to the EC. Member States that did not submit an NRIS included Belgium, Italy, Lithuania, Spain, UK and Sweden. Some of the NRIS reports submitted to the EC during the survey period were a draft version (e.g. Bulgaria, France and Portugal). It is interesting to note that 10 per cent of respondents were unaware of whether their government submitted an NRIS or not, including in, e.g. Bulgaria, Germany, Ireland, Poland, Romania and Spain. Even for those countries that had not submitted an NRIS, in most cases (83 per cent) respondents were still able to say if stakeholders' participation had been organised in the process of preparing the NRIS.

Scope

The survey's aim was to assess

- a) whether the consultation of stakeholders, in particular civil society and Roma organizations was appropriate and
- b) whether anti-discrimination issues were taken seriously in the NRIS.

⁴ See annex 2 of this report.

Stakeholders' participation in the design of the NRIS

As identified in the EC Communication, the NRIS should “be designed, implemented and monitored in close cooperation and continuous dialogue with Roma civil society, regional and local authorities” (An EU Framework for National Roma Integration Strategies up to 2020, p.9).

The following responses were provided to the question asking whether national governments allowed for stakeholder participation in the process of designing the NRIS:

- Positive answers with a “yes” came from: Belgium, Denmark, Spain, Italy, Malta, Portugal, Slovakia, and Slovenia;
- Answers with a majority saying “yes” but not every respondent knowing about the NRIS came from: Bulgaria, Czech Republic, Finland, Ireland, and Romania;
- An equal amount of “yes” and “no” answers were evident in: Germany, Hungary, and the Netherlands;
- Majority of “no” answers came from: Lithuania and the United Kingdom;
- All respondents said “No” in: France, Poland and Sweden; and
- All respondents said “I don’t know” in: Greece and Luxembourg.

52 per cent of the respondents reported that some form of stakeholder participation took place in the design of the NRIS. 31 per cent said that Strategies were designed without the participation of stakeholders. 17 per cent did not know if their government allowed stakeholder participation. Overall, it seems that participation was allowed by governments at a minimum level. However, since there were a moderate number of respondents that were unable to answer this question, it could be possible that the participation rate was higher or lower than that reported.

Those Member States where greater stakeholder participation was reported included Portugal, Slovakia and Spain. All respondents from Portugal, Slovakia and Spain unanimously agreed that their government designed the NRIS in cooperation with stakeholders. Although not all respondents knew about it, the majority of the respondents in Bulgaria (60 per cent), Ireland (66 per cent) and Romania (58 per cent) also reported stakeholders' participation.

Respondents in Germany, Hungary and the Netherlands were divided in their answers: 50 per cent reported stakeholder participation and 50 per cent reported that such participation was not allowed by their government. Although these findings are inconclusive, one can argue that some consultation probably took place, but not all stakeholders were involved.

Lack of stakeholder participation was reported by all respondents in France and the majority of the respondents in the UK (78 per cent).

This paragraph cannot be claimed to incorporate representative results since only one person per country responded to this survey question. We did not want to remove this data, however, due just to a minimal response of stakeholder input, as sometimes much can be inferred as well from a lack of response. Based on the single responses from Belgium, Denmark, Italy and Slovenia, it was reported that these national governments designed the NRIS in cooperation with stakeholders. Although not all respondents knew about it, some of the respondents in the Czech Republic and Finland also reported stakeholder participation in the design of the NRIS. Lack of stakeholder participation was reported by respondents in Poland and Sweden. The respondents from Greece and Luxembourg did not know whether their government allowed stakeholder participation.

Organisation of Stakeholder Participation and Whether it Was Open to All Civil Society

Member States whose respondents reported a totally open consultation process where any organisation/person interested in the topic was able to take part, included Portugal (100 per cent) and Spain (71 per cent). One respondent in Spain had the reservation that only Roma (or pro-Roma) NGOs were able to take part, not wider civil society; all others described a totally open process. Most respondents (75 per cent) in Slovakia reported a totally open consultation process but one described the process as only open to a few organisations which were formally identified. Similarly in Romania, the majority of respondents (71 per cent) said the consultation process was totally open, however, many did not know about it and one described the process as only open to a few organisations which were formally identified.

Other respondents in Belgium (67 per cent) reported a consultation process limited to a group of organisations invited by the government. Respondents in the Netherlands provided contradictory answers. Some reported a totally open consultation process while others reported that no consultation took place. This might suggest that some consultation did take place but not all stakeholders were invited to participate.

In Germany, the majority of respondents (67 per cent) reported a very limited consultation process. It was stated that only four institutions were asked to hand in a written statement and many important NGOs were not involved or informed about it.

This paragraph cannot be claimed to incorporate representative results since only one person per country responded to this survey question. We did not want to remove this data, however, for reasons outlined above. Member States whose respondents reported a totally open consultation process where any organisation/person interested in the topic was able to take part, included: Denmark, Finland, Hungary and Malta. Respondents from other Member States reported a consultation process limited to formal bodies (e.g. Roma councils). These included Bulgaria (members of the National council for collaboration on ethnic and integration issues), Czech Republic (Governmental Council for Roma Minority Affairs) and Slovenia. Other Member States reported a consultation process limited to a group of organisations invited by the government: Ireland (national Traveller organisations, but no other civil society organisations) and Italy (limited to Roma organisations). In the UK, the respondent reported a very limited consultation process with a very small number of regular consultees.

Organisation of Consultation and Who Was Involved

The EC Communication recommends that the design of NRIS should be carried out in close cooperation with Roma civil society, and regional and local authorities (An EU Framework for National Roma Integration Strategies up to 2020, p.9). The survey results clearly show that civil society representatives were those most involved among the stakeholders participating in the design of the NRIS – this was reported by 70 per cent of the respondents. Within civil society, those consulted most often were representatives of Roma NGOs (29 per cent). This was followed by pro-Roma NGOs (21 per cent) and Roma representatives (20 per cent). Trade unions (2 per cent) were consulted the least often of all, followed by equality bodies (11 per cent) and regional/local authorities (14 per cent). Other forms of consultation organised during the NRIS design process included a national conference (in the Netherlands), consulting with Roma people in general (in Finland) and with the public at large (in Portugal).

According to the overall respondent feedback, the most diverse group of representatives involved in the design of the NRIS, which was also available for public consultation (from 28 December 2011 until 18 January 2012), was in Portugal (with 7 different types of group representatives). Respondents from Slovakia reported 6 types of representatives, followed by Spain and Belgium (each with 5 types of representation).

Organisation and Type of Stakeholder Participation

Most respondents (65 per cent) reported that formal participation took place during the consultation process. This included countries such as Bulgaria, Czech Republic, Germany⁵, Lithuania, Poland, Portugal, Slovakia, Slovenia, Spain and the UK. 35 per cent of the respondents reported that informal participation took place during the consultation process, which was evident in countries such as Finland, Hungary, Ireland, Italy, Malta and the Netherlands. In the Netherlands, one respondent suggests that the initiative was taken to organise an informal consultation in the absence of an open and transparent government action. Respondents from some countries (Belgium and Romania) reported that both formal and informal participation took place. This might suggest that participation may have taken place in both ways.

Organisation and Practicalities of Stakeholder Participation, i.e. How Did it Take Place

14 per cent of respondents reported that civil society took part in decision making processes on the NRIS in Bulgaria, Czech Republic, Finland, Italy, Portugal, Romania, Spain, and Slovakia. 10 per cent of respondents from Belgium, Czech Republic, Finland, Portugal and Slovakia also reported that a continuous dialogue between decision makers and civil society and relevant bodies took place within their national contexts. Civil society reported (27 per cent) that they were consulted on the NRIS through stakeholder meetings in Belgium, Bulgaria, Finland, Hungary, Ireland, Portugal, Romania, Slovakia, Spain and the UK.

Furthermore, 33 per cent of respondents reported that written feedback on draft documents was accepted as a means of stakeholder exchange on the NRIS in Belgium, Bulgaria, Czech Republic, Denmark, Germany, Hungary, Ireland, Malta, Portugal, Romania, Spain, Slovakia and Slovenia. Beyond this, a national conference was hosted in the Netherlands and in Finland five hearings were organized in different regions which were open to the Roma population and civil servants working in the social sector. According to one respondent in Denmark, there was criticism of the limited timing allowed for civil society actors to participate in the consultation process. The respondent said: “the document from the Danish document was sent to civil society around the 20th of December, giving us around 9 days to comment on the paper, but only 4 working days due to the Christmas holidays”. Another respondent from Ireland reported that the stakeholder meeting was organised at very short notice in late December, and the document was circulated without sufficient notice to comment. The draft strategy was sent “on the eve of submission” for comment.

Impact of Consultation in Terms of Acknowledging Roma and Civil Society Contributions

For 31 per cent of the respondents, the contributions resulting from the consultation with Roma and civil society had little impact on the NRIS. For 23 per cent of the respondents consultation had no impact. These negative assessments came mostly from respondents in Bulgaria, Ireland, Germany, Hungary, Lithuania, the Netherlands, Romania and Slovenia. 11.5 per cent believe that the consultation had a moderate impact, whereas 10 per cent reported a good impact. Answers ranging from moderate to good impact came in majority from respondents in the Czech Republic and Portugal. Only 4 per cent of the respondents reported that consultation activities had a very good impact. Many responses described a complete lack of impact but some respondents provided a number of examples of impact of civil society contributions on the NRIS.

- Belgium: probable emphasis on mediators and introduction of the ROMED programme, however the full impact could not be assessed since the Belgian NRIS was not published by the end of the survey;

⁵ In the German strategy, it is however explained that only an informal consultation took place, namely that four organisations were asked to comment informally by email.

- Bulgaria: official working group created with NGOs specialised in different areas (health, employment, infrastructure, social issues);
- Czech Republic: strategy inspired from good practices discussed at the Council for Roma Minority Affairs by Roma representatives;
- Germany: civil society put a lot of pressure on the government to have an NRIS despite the government's reluctance – the fact that any kind of document was even sent to the European Commission is probably due to civil society pressure.
- Portugal: Roma NGOs influenced the NRIS on the creation of financial support to Roma and non-Roma NGOs for projects related to Roma communities;
- Portugal: a few of one pro-Roma NGO's own proposals were incorporated in the draft;
- Romania: budgetary allocations and indicators were established after NGO intervention;
- Slovakia: measures to decrease placement of Roma children into special schools;
- Slovakia: 19 NGOs commented on the final version of the text and their list of comments was "partly accepted" (no detailed analysis yet to what extent);
- Slovakia: critical review and direct input in terms of formulation;
- Spain: some of the proposals made by civil society were included in the last draft strategy

Openness and Transparency of the NRIS Drafting Process

There were a variety of responses in regard to the openness and transparency of the NRIS drafting process. 41 per cent of respondents reported that the process of drafting the NRIS was not transparent at all. These included participants in France, Germany, Ireland, Lithuania, the Netherlands, Poland, Slovenia, Sweden and the UK. Indeed, one respondent from the Netherlands implied that the lack of transparency and partnership led to "feelings of disappointment, anger, cynicism". 24 per cent reported that there was not enough transparency during the NRIS drafting process, including those from Belgium, Bulgaria, Denmark, Greece, Italy and Romania. In the case of Hungary, according to 50% of the respondents the drafting process of the Hungarian NRIS was not transparent at all, whereas for 50% it was not transparent enough. For 14 per cent of respondents their NRIS was drafted in a sufficiently transparent way but not enough awareness was raised on the process. This was more consistently found in the Czech Republic and Spain. 13 per cent of all respondents, in particular in Portugal, Slovakia and some in Spain believe their NRIS was drafted in a sufficiently transparent way and that enough awareness was raised on the process. One respondent from Slovakia noted that "thanks to personal initiative of one of the authors, pro-Roma NGOs were informed about the draft in advance".

Foreseen Stakeholder Participation in the Implementation Process

Survey responses varied remarkably in the answers to whether the implementation process foresaw stakeholder participation. For 49 per cent of the respondents it is not clear yet. For 27 per cent, no meaningful participation is foreseen.

23 per cent agreed that participation had been foreseen, including all respondents in the Czech Republic and a majority of respondents in Portugal, Slovakia and Spain. The assessment balanced between "not clear yet" and "yes" for Finland and Lithuania. Slovenia and the UK reported that no meaningful participation was foreseen. In some countries respondents were not yet clear as to whether stakeholder participation was foreseen in the implementation or not, including: Belgium, Bulgaria, Denmark, France, Greece, Italy, Malta, Poland, and Romania. Responses from Germany, Hungary, Ireland, Netherlands and Sweden ranged between "not clear yet" and "no meaningful participation".

If Stakeholder Participation is foreseen, expected involvement of Roma in the implementation process

41 per cent of respondents reported that Roma participation is foreseen but that adequate structures are not in place. This response mostly came from Belgium⁶, Bulgaria, Hungary, Ireland, Italy, Malta, Netherlands, Romania, Sweden and the UK. A balance between 'non-adequate' and 'adequate' structures of participation for Roma was assessed for the Czech Republic NRIS. Adequate structures of participation were only considered to be 'in place' in Lithuania, and by some respondents in Spain. Other respondents from Spain reported that 'active participation of civil society and especially Roma is promoted', and a similar assessment was found in Finland. In contrast, Portugal and Slovakia assessed the foreseen Roma involvement and participation as balanced with a wide range of answers. In France, only limited participation is foreseen and there still lacks clear methodology and timetables for this. It was reported that local municipalities in Sweden will work on Roma issues, but it is up to the municipalities to decide how to involve the Roma.

Evidence of a Human Rights Approach: Anti-discrimination and Anti-Gypsyism in the NRIS

Consideration of Anti-discrimination Concerns and Anti-Gypsyism in the Preparatory Phase of the NRIS

In considering whether the NRIS took a human rights approach, it was assessed whether governments considered anti-discrimination issues and anti-Gypsyism during the preparatory phase of drafting the NRIS. One outcome from the survey is that 27 per cent of respondents state that anti-discrimination measures and the fight against anti-Gypsyism have not been considered at all. This is the case in Germany, Hungary, Ireland, Luxembourg, Netherlands, Poland, and the UK. Answers ranged between 'I don't know' and 'not at all' for Finland and France. In Romania, responses ranged between assessing that anti-discrimination and anti-Gypsyism were not discussed at all and assessing that these issues were discussed but only in relation to particular theme (housing or health...), not in all areas of the submitted strategy. Anti-discrimination was discussed only in relation to a particular theme in the Bulgarian NRIS, according to survey respondents, but not in all priority areas of the Strategy. 10 per cent of respondents considered that these issues were discussed but not enough attention was paid to them in Belgium, Italy, and Malta.

Only 7 per cent reported that sufficient attention was paid to anti-discrimination and racism within the four key areas of housing, health, employment and education, according to a majority of respondents in Spain and Slovakia. Sufficient attention was paid to anti-discrimination both within the four key areas and beyond as stand-alone issues in the NRIS of the Czech Republic and Portugal (7 per cent of total respondents). 11 per cent of respondents were uncertain whether anti-discrimination measures were discussed, including in Denmark, Greece and Lithuania. Finally, anti-discrimination measures were discussed prior to drafting the Slovenian Strategy, but no implementation was foreseen in the Strategy itself.

Inclusion of Anti-discrimination Concerns and Anti-Gypsyism in the NRIS

Considering that the inclusion of anti-discrimination measures and measures to fight anti-Gypsyism in the NRIS is a necessary first step for the long-term integration of Roma in national contexts, the lack of emphasis placed on such measures in the NRIS is disturbing. 23 per cent of respondents reported that there was no mention of anti-discrimination and the fight against anti-Gypsyism at all in Ireland, Poland or the UK. For 24 per cent of respondents some measures are planned but they are insufficient. This

⁶ It has to be kept in mind that the Belgian NRIS was not yet published by the end of the survey.

assessment can be found in countries such as Belgium, Bulgaria, France, Hungary, Italy, Luxembourg, Netherlands, Romania and Slovenia.

Sufficient measures on anti-discrimination and fighting anti-Gypsyism are envisaged within the four key areas housing, health, employment and education in the NRIS for 7 per cent of the respondents, including in the Czech Republic, Portugal and Spain. Some respondents from Portugal also reported that there were sufficient measures envisaged within the four key areas and beyond to target anti-Gypsyism in general in the NRIS. Uncertainty about the measures was reported by 12 per cent of respondents, including for Denmark, Germany, Greece, and Lithuania. In Finland and Sweden, respondents provided various answers so the survey was inconclusive.

Part 3: Lessons Learnt and Recommendations

Many valuable lessons can be drawn from the desk screening analyses of the NRIS as well as the analysis of the stakeholder survey on the NRIS.

Lessons learnt from the desk screening exercise and the stakeholders survey

a. Recognising the starting point and learning from past experiences

Drawing from **prior research** and/or making referrals to publications on Roma served as a basis in devising the National Roma Integration Strategies for Denmark, Finland, Hungary, Latvia, Slovakia, Spain, and Wales. There was no mention specifically on using previous research in the NRIS for Bulgaria, the Czech Republic, Germany, Netherlands, and Portugal.

Nonetheless, Bulgaria, Czech Republic, Finland, France, Hungary, Poland, Slovenia and Spain for instance, refer to their **previous experiences with Roma integration** strategies and with specific measures targeting Roma, such as the Decade of Roma Inclusion, involvement in the EU Roma Network and building on experiences from previous strategies. The Latvian NRIS does not necessarily build on lessons learnt from previous strategies, but it is considering exchanging lessons learnt in the middle of the implementing period of the national strategy.

When it comes to using the **10 Common Basic Principles (CBP)** on Roma Inclusion as a base-line in the Strategies, Bulgaria, France, Hungary, Slovakia mention the CBPs, but there is some question of the CBPs being sufficiently reflected in the overall Strategy. Neither the Czech Concept nor the Dutch and Welsh NRIS make explicit reference to the CBPs for Roma Inclusion. The Czech Concept nonetheless complies with all the principles (with the exception of Principle 7) and the Dutch and Welsh NRIS appear to be inspired from the CBPs. The Polish NRIS also reflects most of the principles without mentioning them. Denmark, Finland, Latvia, Portugal and Spain mentioned the CBPs, which are sufficiently reflected in the overall Strategies.

It does not appear as if research, reference to the CBPs, or previous experience with national Roma integration strategies were used as a basis for the development of the Strategies in Germany, Austria, Romania and Slovenia.

b. Setting realistic targets

The objectives for defining ambitious, targeted and realistic goals within a defined timeline varied from one NRIS to the next. Overall, the Bulgarian, Dutch and Slovene NRIS do not give the impression of being realistic and feasible. On the contrary, the Danish, Finnish, French, Latvian, Portuguese, Slovakian and Spanish NRIS give the impression of being realistic and feasible. The Hungarian NRIS gives the impression of being realistic and feasible, but with a number of limitations. The impact of the economic crisis will potentially affect the feasibility of the NRIS.

Positive

Based on the ERPC's assessment, the following countries fared well in terms:

- Of establishing concrete goals/specific targets to be achieved: Finland, Hungary and Portugal.
- Of defining specific timelines that seem realistic and feasible: Finland, Latvia, Portugal and Spain.
- Of covering the full range of the EU Framework objectives: Finland, France, Hungary, Latvia, Portugal, Slovakia and Slovenia.

- Of setting objectives extending beyond the minimum defined by the Framework: Bulgaria⁷, Finland, Hungary, Latvia, Romania, Slovakia, Slovenia and Spain.

Negative

Based on the assessment of the ERPC reviewers, the following countries fall short with the NRIS in terms:

- Of establishing concrete goals/specific targets to be achieved: Bulgaria, Czech Republic, Germany, Netherlands, and Wales.
- Of setting specific timelines that are realistic: Bulgaria, Czech Republic, Germany, Netherlands, Poland, Slovenia, and Wales.
- Of covering the objectives according to the full range of the EU Framework: Denmark, France, Germany, Netherlands, and Wales.

Overall, many of the Strategies failed to provide an adequate description of the current situation with regard to the Roma. The Strategies themselves as well as the Action Plans revealed a lack of awareness and/or no intention on the part of national governments to tackle crucial issues for integrating Roma in each of the four priority areas defined by the European Commission.

The inadequate identification of the problems in setting ambitious, targeted and realistic goals affected the formulation of strategic goals and concrete measures with varying effects from one NRIS to the next. There were often deficiencies because 1) data was minimal; 2) systemic factors for social exclusion of Roma, such as segregated education had not been identified; and 3) of a lack of analysis of the good and bad practices in Roma inclusion programmes from previous years.

c. Establishing clear responsibilities and coordination mechanisms for implementation

Overall, the implementation coordination mechanisms foreseen in the NRIS do not seem adequate. Out of 18 NRIS that have been submitted, only six – namely Finland, France, Latvia, Portugal, Slovakia and Spain – include coordination mechanisms which are considered adequate. Some countries do not even mention their national contact point and/or its mandate, such as the Czech Republic, Denmark, Germany, Latvia, the Netherlands and Wales.

A further problem, common to several NRIS (e.g. Austria, Italy, Portugal or Wales), is that often no indication is given on how the implementation is ensured and that there is not enough information available in regard to the communication channels between both horizontal and vertical actors. In several cases, such as in the Italian and Slovenian strategy papers, due to the lack of a clear description of the division of tasks, it is also difficult to really assess whether the coordination mechanism foreseen is adequate.

Moreover, most of the Strategy papers do not indicate how the implementation of the NRIS will be ensured at the regional and local levels and who is responsible for the implementation on the ground.

The mismatch between the measures proposed in the NRIS and the actual political will is a concern that has been raised in several assessments e.g. in the case of Czech Republic where the Council for Roma Minority Affairs has a very weak mandate. Also, in the case of Latvia and Poland, certain activities and projects are mentioned but there is no real responsibility over their implementation and Roma communities are not involved at all in the coordination. Finally, the Hungarian case has been

⁷ Despite the additional goals identified in the Bulgarian NRIS, including measures for media outreach, preserving Roma culture, the rule of law and anti-discrimination, these are only vaguely elaborated upon. It is unclear what mechanisms for implementation will be applied or how these goals will be monitored.

highlighted for the fact that the recent political and legal developments in Hungary do not reflect the equality agenda of the Strategy.

d. Allocating adequate budget to the NRIS

It is important that dedicated funding be made available for enabling the implementation of measures described in the NRIS and the Action Plans. Funding for this varied, however, from one NRIS to the next.

The majority of NRIS do not allocate budgets. Those NRIS allocating budgets include Denmark (from 2012-2016, a total of 20 million Danish Kroner, around 2.7 million Euro), Finland (3 million Euro to municipalities), Poland (annual allocation up to PLN 10 million, around 2.5 million Euro for education and PLN 700,000, around 175,000 Euro for textbooks for Roma students – additional amounts are not specified), Portugal and Wales (amounts not specified). In some NRIS, information on budget allocation was very incomplete (Romania) or was not provided at all (Austria, Germany, Slovakia and Slovenia).

Budget allocation varied from one NRIS to another. However, **in most NRIS the budget will be allocated through several different processes**, with the exception of Finland and Poland where it will be carried out only according to national calls for proposals. The budget line allocation is also placed within core ministries (Slovenia), government without specifying (Denmark and Portugal) and to specific governmental funds (Wales). **Budget allocation as EU funding is not sufficiently used.** Budget for the NRIS is only allocated as EU funding in the Danish and Portuguese strategies.

None of the NRIS indicate the amount and percentage of the Strategy to be covered by EU funding. Most of the NRIS do not foresee facilitating access to EU funding. Only the Danish (through the Danish Structural Fund Programmes 2007-2013), French (by privileging the use of the European Social Fund for the dissemination of good practices and innovative programmes), Latvian (by building capacities of Romani NGOs and focusing on accessing funds) and Spanish (by fostering the use of and strengthening the amount of the ERDF dedicated to Roma, etc.) NRIS have a process to facilitate access to EU funding.

e. Planning adequate accountability and monitoring mechanisms

Positive

There are indications on how the national strategies will be **implemented** in Denmark, Finland, Latvia, Portugal, Slovakia and Spain. In Spain, the NRIS uses the principles of good governance as indicators for monitoring implementation: openness, participation, responsibility, efficiency and coherence. In contrast, Portugal has quantitative indicators, which enable effective monitoring of progress.

There are indications on how the national strategies will be **monitored** in Finland, Poland and Slovenia and there is a **reporting system** for the NRIS in Finland, Hungary, Poland, Portugal, Slovakia, Slovenia and Spain. In addition, there are indications of who is responsible for reporting on the progress of the national strategies in Poland, Portugal, Slovakia, Slovenia, and Spain.

Negative

There are no indications on how the national strategies will be **implemented** in Bulgaria, Czech Republic, France, Germany, Hungary, Netherlands, Poland and Romania. Some indications exist for Slovakia and Slovenia but they are rather vague.

There are no indications on how the national strategies will be **monitored** in Bulgaria, Czech Republic, Denmark, Finland, Germany, Latvia, Netherlands, Romania, Spain, and Wales. Monitoring methods mentioned in the French NRIS concern only the monitoring of the access to rights of persons in situation of poverty and exclusion, irrespective of ethnic origin.

The **reporting systems** in the Bulgarian and Polish NRIS remain problematic, and there is no reporting system set up in France, Germany, Netherlands and Wales. There are no indications on who will be responsible for reporting on the progress of the national strategies in the Czech Republic and Romania.

f. Adopting a human rights based approach as the basis of the NRIS

Regarding the recommendation to follow a human-rights approach, including in particular gender equality, non-discrimination, desegregation, combating anti-Gypsyism, and promoting proactive approaches to Roma inclusion, the different Member States took focused on varying aspects in each NRIS.

The ERPC stakeholders' survey unfortunately reveals the lack of emphasis placed on such measures in the NRIS, with a majority of respondents reporting that there was no mention of anti-discrimination and the fight against anti-Gypsyism at all in the NRIS or that some measures are planned but they are insufficient. Human rights related issues were also often neglected in the discussions during the preparatory drafting phase of the NRIS.

The desk screening assessment of the NRIS highlighted the following trends, confirming the survey results that a majority of the NRIS do not take a human rights based approach:

- **anti-discrimination**

In Bulgaria, Hungary, Poland, Portugal, Slovakia and Slovenia some targeted anti-discrimination measures are proposed but they are insufficient, while in Germany the NRIS does not contain any targeted anti-discrimination measures. In France and Wales, the NRIS include anti-discrimination measures in relation to only particular themes, but not in all areas of the submitted Strategies.

Anti-discrimination measures are foreseen in each key area, and go beyond to target anti-discrimination in general only in Finland, Latvia and Spain. In Denmark, the NRIS targets anti-discrimination in general.

- **anti-Gypsyism**

The NRIS in Austria, Denmark, France, Germany, the Netherlands, Portugal and Slovenia do not target anti-Gypsyism at all as special measures. Some measures are planned in the Bulgarian and Polish NRIS to target anti-Gypsyism, but are perceived as insufficient, while the Romanian NRIS is perceived as minimalist in terms of combating anti-Gypsyism.

In the Finnish Strategy, the fight against anti-Gypsyism represents one of the objectives. Yet there are no specific measures referring to anti-Gypsyism foreseen. There are no measures targeting anti-Gypsyism in the Latvian Strategy, yet most of the anti-discrimination measures also target the anti-Roma sentiments. The measures from Slovakia, although insufficient, are a good starting point. Only the Spanish strategy is considered as including sufficient measures to tackle anti-Gypsyism in the NRIS.

- **gender**

There are no measures to address gender equality in the Bulgarian, German, Latvian, Dutch, and Welsh NRIS. While the German Strategy recognises that women and girls experience multiple discrimination, it nevertheless fails to specifically target gender equality. Similarly, there are no specific measures in the Finnish NRIS to address gender equality relative to specific areas, but gender equality is viewed as a cross-cutting issue throughout the Strategy. The Czech Concept, as well as French, Romanian and Slovenian NRIS envisage gender equality in relation to particular themes, not in all areas of the submitted strategy. Some measures are planned in the Danish, Hungarian, Polish and Slovak Strategies to target gender equality, but these are insufficient.

On a more positive note, sufficient measures are envisaged within the four areas to target gender equality in Spain. Finally, it should be noted that in Portugal and Spain the NRIS also envisage specific measures to address multiple discrimination of Romani women.

- **migration issues**

The Bulgarian, Finnish, Hungarian, Latvian, Portuguese, Romanian, Slovak and Welsh Strategies fail to address the issue of migration at all. The Austrian Strategy refers to Austria's National Integration Plan, which is partly dedicated to the fight against discrimination of immigrants and minorities. Migration related measures are also envisaged in the Danish, French, and Dutch NRIS, but only in relation to a particular priority area, not in all areas of the Strategy.

Only in Spain does the NRIS address the issue of migration and sufficient measures are envisaged within the four key areas and beyond to target fundamental rights of migrant Roma in general.

- **empowerment**

The Czech Concept and French and Slovenian strategies do not address the issue of empowerment at all and there is little mention of empowering Roma in the Bulgarian NRIS. Some measures are planned in the Danish, German, Dutch, and Romanian NRIS to target the issue of empowerment, but these are insufficient. Different measures are foreseen in the Finnish, Latvian, Slovak and Welsh Strategies to contribute to the empowerment of the Roma minority. This is even indicated as a main objective of the Finnish Strategy. Nevertheless, it is difficult to assess if the measures are or will be sufficient, as there is no information about capacities, in particular at local level. In the Polish NRIS, empowerment related measures are envisaged only in relation to a particular area, not in all areas of the Strategy. In the Portuguese NRIS empowerment is mainly promoted within the area of gender equality but also by promoting citizenship education.

It is interesting to note that the Hungarian strategy specifically mentions going beyond consultation, that social inclusion must involve the 'empowerment of those living in poverty and the Roma community in order to enable them to shape society'. The Spanish NRIS envisages sufficient measures within the four key areas and beyond to target Roma empowerment in general.

g. Ensuring Roma participation in the drafting process and implementation

Findings from the ERPC stakeholders' survey suggest that in most Member States, some form of participation has taken place. However, the NRIS consultation processes were often not accessible by all stakeholders or even Roma civil society. When consultation did take place, it seemed to have no impact at all or very little impact on the NRIS in the vast majority of cases. Moreover, a large majority of respondents across Member States described the drafting process of the NRIS as lacking transparency. In most of the cases, stakeholders' participation, in particular the involvement of Roma, is still unclear with regard to implementation of the NRIS.

From the responses in the stakeholders' survey, it seems that a few Member States, including Portugal and Spain, can be considered as good practices as regards stakeholders and Roma participation in the NRIS. In contrast, the survey brought evidence that in some Member States no consultation took place or the consultation was very limited. This is the case for instance for France, Germany, and the United Kingdom. In countries like Romania and Bulgaria, some consultation took place but its impact seemed to have been quite limited.

Recommendations from the stakeholders' survey on the NRIS

The ERPC asked survey respondents to highlight their main recommendation for the NRIS of their country. A wide range of recommendations were submitted in this context on different aspects of the Strategies. Most commonly, the recommendations referred to participation processes and the inclusion of civil society in the drafting and implementing of the NRIS; to implementation and monitoring mechanisms; and to the need of adopting human rights based approaches in the Strategies.

Participation

Recommendations on participation came from respondents located in Belgium, Bulgaria, Finland, France, Germany, Ireland, Italy, Lithuania, the Netherlands, Portugal, Romania, Slovakia, Spain, Sweden and the United Kingdom. These recommendations include:

- Ensure more consultation and participation of Roma and Roma organisations, both in the drafting phase and implementation of projects that directly affect them;
- Involve all stakeholders in the consultations, including civil society (also at grassroots level), employers, experts and academics, regional and local authorities, equality bodies, etc;
- Go beyond consultation to ensure a comprehensive and responsible involvement of relevant stakeholders and establish a continuous dialogue with stakeholders;
- Put in place adequate mechanisms to organize participation, e.g. establishment of a steering group with an independent chair and civil society representation to steer this process; establishment of joint committees both for the elaboration and follow up involving public administrations and civil society; advertisements in local press and national papers;
- Organise wide information/promotion campaigns, both on involving Roma in the decision making process and information campaigns targeted at the majority population on Roma inclusion;
- Work with Roma NGOs on a practical level, including in the implementation process ;
- Increase transparency about the acts of governments on Roma related issues;
- Report on how the point of view of Roma is taken into account in policy making and implementation.

Implementation and monitoring mechanisms

Recommendations on implementation and monitoring came from respondents located in the Czech Republic, Finland, Ireland, Hungary, Lithuania, Romania, Slovenia, Slovakia and Spain. These recommendations include:

- Invest sufficient financial resources in implementation;
- Have clear budget lines to ensure the implementation of each indicator, including at the regional and local levels;
- Set clear, achievable goals, SMART indicators (Specific, Measurable, Attainable, Realistic and Timely), clear timelines, a strong and transparent monitoring process and a review mechanism;
- Ensure ownership of the Strategy by all the relevant government departments;
- Include a precise joint working methodology for different responsible institutions and stakeholders;
- Form an inter-institutional body involving all the relevant governmental institutions (horizontally – ministries, vertically – involving local, regional and national levels) assigned with coordinating the implementation of the NRIS;
- Ensure that implementation is carried out in dialogue with stakeholders, in particular civil society;
- Plan regular assessments and impact studies of the measures included in the NRIS;
- Commission external and independent evaluations of the NRIS;
- Keep the concept open for further development based on regular monitoring and impact assessment.

Human rights based approach

Recommendations on a human rights based approach came from respondents located in France, Germany, Luxembourg, the Netherlands and Romania. These recommendations include:

- Give a higher priority to the fight against discrimination in all aspects of life;
- Address anti-Gypsyism and the latent racism against Roma;
- Increase efforts to bring about an acceptance of the Roma in the media, schools and other areas of public life, e.g. a campaign should be carried out in the media and through public events, about the culture and history of the Roma, in addition to the problems which they are confronted with, for example in the education system;
- Toughen the laws relating to racism, for example racist remarks made in public must be prosecuted;
- Include awareness raising activities that are initiated and carried out by the Roma themselves;
- Take a more positive approach towards the so called Roma issue;
- Avoid criminalising Roma and focusing on negative aspects (criminality, deviant behaviour and exploitation of children, etc.);
- Introduce the gender perspective analysis as a cross-cutting issue and with targeted measures in the four priority areas;
- Address and protect the human rights of Roma migrants, including their rights to education and decent healthcare;
- Set up an inclusion strategy for Roma migrants and stop expulsion policies;
- Improve the quality of the asylum process, including for Roma migrants coming from European countries.

Other recommendations included the improvements of policy links, e.g. clearly integrating the goals of the Strategy into other policies at national and European level, or including a clear definition of Roma at the beginning of the NRIS. In particular in the United Kingdom and Ireland, both Roma and Travellers had to be targeted by the NRIS. Finally, survey respondents recommended increasing the funding and support for Roma and pro-Roma organisations.

ERPC recommendations

Roma inclusion will continue to face challenges as long as little is done to combat the deep-seated anti-Gypsyism and discriminatory tendencies prevalent in European societies. Discrepancies in treatment are evident in different areas such as housing, education, employment, health care, political participation, or freedom of movement. Attitudes towards Roma are becoming increasingly hostile. As we witness severe harassment and violence against Roma in various Member States and considering the expected increased tensions and anti-Roma sentiment due to the economic crisis in many EU countries, it is urgent to address anti-Gypsyism.

The different National Roma Integration Strategies show that there are clear and worrying differences in the political will to address discrimination and anti-Gypsyism and to amend national policies to enable greater participation of Roma in all collective areas of society.

ERPC recommends that the NRIS should be based on a core meant to eliminate anti-Gypsyism. Although eliminating the gaps related to income, health, education are important, there will be no progress without putting making the elimination of anti-Gypsyism a key priority of the NRIS.

Strategies to combat anti-Gypsyism at European and national level that go beyond the Framework of the NRIS should be developed. First, there should be a strong commitment to take urgent **measures against the worrying and widespread racism, violence and harassment that Roma face**, such as speaking out on, monitoring of racist violence and hate speech incidents, developing instruments to combat racism and supporting the Commission and Member States in the implementation of these instruments.

Possible instruments are:

- a crisis protocol to respond adequately to anti-Gypsyism incidents, such as hate speech and inter-ethnic clashes;
- steps to address the weaknesses of the Framework Decision on combating racism and xenophobia in EU legislation by providing an accurate definition of the types of racist and xenophobic activities and behaviours which it seeks to target, including responses to public figures and representatives of state authorities who engage in racist and xenophobic activities and behaviours, and expressly addressing racist violence targeting particularly vulnerable groups, such as Roma;
- strengthening the monitoring of the implementation of the Equality directives and the Framework Decision on combating racism and xenophobia and reacting to violations of EU legislation appropriately.

Moreover, ongoing efforts are needed from governments to improve implementation of the NRIS in the four key priority areas of health, housing, employment and education in the national context. The ERPC made suggestions to tackle the lack of capacity and experience in implementing Roma integration strategies. For instance, it was proposed to provide technical assistance to the implementers and to ensure that a sufficient number of Roma representatives form part of the implementation teams.

Governments should set up clearer indicators as well as better monitoring instruments to measure and monitor progress made. Experience to date shows that the reporting process is often reduced to reports that lack methodology for evaluation, as well as and concrete indicators and mechanisms for collecting information related to outcomes of the integration policies. Consequently, the European Commission and Member States should clearly establish a strong monitoring and reporting process of the NRIS. Updates in annual reports by each institution engaged in the process for implementing the NRIS is not a sufficient reporting mechanism. More thought and qualitative methodology is needed for assessing progress and reflection as to whether annual reports are sufficient. Importantly, governments should make the NRIS evolve on a yearly basis according to lessons learnt from the monitoring mechanisms.

Clear details on the funding for Roma-related measures are needed, delineating EU and national funding. Additionally, Member States should be more committed to using EU financial instruments for Roma inclusion (e.g. Structural Funds).

A stronger and more effective Roma participation in the implementation of the NRIS is needed.

As evident from this report, some good practices have emerged in this initial stage of implementation of the European Framework. For instance, the Spanish NRIS was rated positively by the ERPC. It is important to set up effective means of exchanging good practices, and the ERPC recommends that peer reviewing mechanisms be set up between Member States.

ANNEX 1: ERPC indicators to screen the NRIS – on the basis of ERPC minimum principles

1. Name of Member State object of the analysis

- Austria Belgium Bulgaria Cyprus Czech Republic Denmark
 Estonia Finland France Germany Greece Hungary
 Ireland Italy Latvia Lithuania Luxembourg Malta
 Netherlands Poland Portugal Romania Slovakia Slovenia
 Spain Sweden United Kingdom

2. Has the Member State submitted a NRIS?

- Yes
 No (no need to answer the other questions)

3. Experience of the Member State with the Roma integration strategies or with specific measures targeting Roma. (multiple answers possible)

- The country has an experience with the Strategies for Roma integration. Please indicate when the first strategy was approved and how often it was updated.
 The Member State joined the Decade of Roma Inclusion
 The Member State is involved in the EU Roma Network
 There is/are other significant international partnerships established to support Roma integration. Please specify.
 The new NRIS is building on the experiences/lessons learned from previous strategies. Please specify

4. Recommendation to utilise the 10 Common Basic Principles on Roma Inclusion as a base-line.

A. To what extent does the NRIS refer to and comply with the CBP?

- The CBP are not referred to and the NRIS does not take them into account
 The CBP are not referred to but the NRIS is inspired from the CBP
 The CBP are mentioned but not sufficiently reflected in the overall strategy
 The CBP are mentioned and are sufficiently reflected in the overall strategy
 Other, please specify

B. Please comment and/or give example on the use of the CBP

Free text box.

5. Recommendation to define ambitious, targeted and realistic goals within a defined timeline.

A. Do the objectives cover the full range of the EU framework?

- Yes
 No

Please specify.

B. Do the objectives go beyond the EU framework?

- Yes, please specify which objectives go beyond the minimum defined by the Framework.
 No

C. Are there timeframes defined?

- Yes, please specify if the timeframes proposed seem suitable and why.
- No

D. Overall does the NRIS give the impression of being realistic and feasible?

- Yes
- No

Please specify.

6. Recommendation to follow a human-rights approach, including in particular gender equality, non-discrimination, desegregation, combating anti-Gypsyism and promotion of a pro-active approach to Roma inclusion.

A. Does the NRIS entail targeted anti-discrimination measures?

- Not at all
- Some measures are planned but they are insufficient
- Anti-discrimination measures are envisaged only in relation to a particular theme (housing or health...), not in all areas of the submitted strategy
- Sufficient measures are envisaged within the four key areas (housing, health, employment and education)
- Sufficient measures are envisaged within the four key areas and beyond to target anti-discrimination in general
- Other, please specify

B. Does the NRIS target anti-Gypsyism in particular?

- Not at all
- Some measures are planned but they are insufficient
- Anti-Gypsyism measures are envisaged only in relation to a particular theme (housing or health...), not in all areas of the submitted strategy
- Sufficient measures are envisaged within the four key areas (housing, health, employment and education)
- Sufficient measures are envisaged within the four key areas and beyond to target anti-Gypsyism in general
- Other, please specify

C. Does the NRIS target gender equality?

- Not at all
- Some measures are planned but they are insufficient
- Gender equality measures are envisaged only in relation to a particular theme (housing or health...), not in all areas of the submitted strategy
- Sufficient measures are envisaged within the four key areas (housing, health, employment and education)
- There are specific measures addressing multiple discrimination of Romani women
- Other, please specify

D. To what extent and how do the NRIS address the issue of migration?

- Not at all
- Some measures are planned but they are insufficient
- Migration related measures are envisaged only in relation to a particular theme (housing or health...), not in all areas of the submitted strategy
- Sufficient measures are envisaged within the four key areas (housing, health, employment and education)

- Sufficient measures are envisaged within the four key areas and beyond to target fundamental rights of migrant Roma in general
- Other, please specify

E. To what extent and how do the NRIS address the issue of empowerment?

- Not at all
- Some measures are planned but they are insufficient
- Empowerment related measures are envisaged only in relation to a particular theme (housing or health...), not in all areas of the submitted strategy
- Sufficient measures are envisaged within the four key areas (housing, health, employment and education)
- Sufficient measures are envisaged within the four key areas and beyond to target Roma empowerment in general
- Other, please specify

F. How are national strategies linked to other domestic or EU anti-discrimination and social inclusion policies?

Free text box.

7. Recommendation to ensure sufficient budget and specific allocation of funding.

E. Are there any budgets allocated for the Strategy and how much?

- Yes, please specify.
- No

F. How is budget allocation planned?

- Budget lines within core ministries to cover specific measures directly
- National calls for proposals
- Other, please specify

G. What percentage of the Strategy is planned to be covered by EU funding?

Free text box

H. Is a process foreseen to facilitate access to EU funding?

- Yes, please specify.
- No

8. Recommendation to establish coordination mechanism between horizontal and vertical actors at national level—with clear lines of responsibilities and accountability, in particular regarding the role and a clear mandate of a national point of contact for Roma integration.

A. What is the structure and mandate of the national contact point?

Free text box

B. Does the coordination mechanism foreseen seem adequate?

- Yes
- No

Please specify

C. How is ensured the implementation by line ministries? Who is responsible for the implementation and on what ground?

Free text box

D. How is ensured the implementation at the regional and local level? Who is responsible for the implementation and on what ground?

Free text box

E. What are the communicational channels – between both horizontal and vertical actors?

Free text box

9. Recommendation to establish strong implementation mechanisms and monitoring system.

A. Are there indicators planned for monitoring implementation?

- Yes, please specify.
- No

B. Are there indications on how the national strategies will be implemented?

- Yes, please specify and indicate if the implementation seems feasible.
- No

C. Was there research that served as the base for designing the NRIS?

- Yes, please specify.
- No

D. Is there a reporting system?

- Yes, please specify.
- No

ANNEX 2: ERPC stakeholders survey on the NRIS

1. Please tick the country in which you are based

- | | | | | | |
|-------------------------------------|----------------------------------|---|------------------------------------|---|-----------------------------------|
| <input type="checkbox"/> Austria | <input type="checkbox"/> Belgium | <input type="checkbox"/> Bulgaria | <input type="checkbox"/> Cyprus | <input type="checkbox"/> Czech Republic | <input type="checkbox"/> Denmark |
| <input type="checkbox"/> Estonia | <input type="checkbox"/> Finland | <input type="checkbox"/> France | <input type="checkbox"/> Germany | <input type="checkbox"/> Greece | <input type="checkbox"/> Hungary |
| <input type="checkbox"/> Ireland | <input type="checkbox"/> Italy | <input type="checkbox"/> Latvia | <input type="checkbox"/> Lithuania | <input type="checkbox"/> Luxembourg | <input type="checkbox"/> Malta |
| <input type="checkbox"/> Netherland | <input type="checkbox"/> Poland | <input type="checkbox"/> Portugal | <input type="checkbox"/> Romania | <input type="checkbox"/> Slovakia | <input type="checkbox"/> Slovenia |
| <input type="checkbox"/> Spain | <input type="checkbox"/> Sweden | <input type="checkbox"/> United Kingdom | | | |

2. What type of organization do you represent?

- Roma NGO
- Pro- Roma NGO

- Anti-racist NGO
- Human rights NGO
- Regional/Local authorities
- Equality body
- Trade unions
- Other, please specify

3. Has your government submitted a National Roma Integration Strategy (NRIS) or a set of policy measures on Roma Inclusion to the EC?

- Yes
- No

4. Has your government allowed for stakeholders participation in the process of designing the NRIS?

- Yes
- No (go to question 11)
- I don't know (go to question 11)

5. If participation was organized, was it open to all civil society?

- Yes, any organization/any person interested in the topic was able to take part
- No, please specify

6. If a consultation was organized, who was consulted? (multiple answers are possible)

- Roma NGOs
- Pro- Roma NGO
- Roma representatives
- Regional/Local authorities
- Equality body
- Trade unions
- Others, please specify

7. If participation was organized, what type of participation took place?

- Formal participation
- Informal participation

8. If participation was organized, how did it take place? (multiple answers are possible)

- Civil society took part in decision making on the NRIS
- A continuous dialogue between decision makers and civil society and relevant bodies took place
- Civil society was consulted on NRIS through stakeholder meetings

- Civil society was consulted on NRIS through online consultation
- Written feedback on draft document of the NRIS
- Other, please specify

9. If a consultation was organized, what was its impact in terms of acknowledging Roma and civil society contributions?

- No impact
- Poor
- Moderate
- Good
- Very good

10. Do you have a concrete example of how your national strategy was influenced by civil society contributions?

11. How open and transparent was the process of drafting the NRIS?

- Not transparent at all
- Not transparent enough
- Sufficiently transparent but not enough awareness raised on the process
- Sufficiently transparent and enough awareness raised on the process
- Other, please specify

12. Is stakeholder participation foreseen in the implementation process ?

- Not clear yet
- No meaningful participation is foreseen
- Yes

13. If participation is foreseen, how will the Roma be involved and participate in the implementation of the NRIS?

- Some participation is foreseen but adequate structures are not in place
- Adequate structures of participation are in place
- Active participation of civil society and specifically of Roma is promoted
- Other, please specify

14. How were anti-discrimination concerns and the fight against anti-Gypsyism discussed during the preparatory phase?

- Not at all
- Anti-discrimination was discussed only in relation to a particular theme (housing or health...), not in all areas of the submitted strategy
- Those issues were discussed but not enough attention was paid to them
- Sufficient attention was paid to anti-discrimination and racism within the four key areas housing, health, employment and education
- Sufficient attention was paid to anti-discrimination within the four key areas and beyond as a stand-alone issue
- I don't know
- Other, please specify

15. How are anti-discrimination and the fight against anti-Gypsyism included in all areas of the submitted strategy?

- Not at all
- Some measures are planned but they are insufficient
- Anti-discrimination measures are envisaged only in relation to a particular theme (housing or health...), not in all areas of the submitted strategy
- Sufficient measures are envisaged within the four key areas housing, health, employment and education
- Sufficient measures are envisaged within the four key areas and beyond to target anti-Gypsyism in general
- I don't know
- Other, please specify

16. What would be your main recommendation for the NRIS of your country?