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Delegations will find attached document SWD(2023) 3 final – Part 1/2.

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PART 1/2

COMMISSION STAFF WORKING DOCUMENT

Accompanying the document

**COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN
PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL
COMMITTEE AND THE COMMITTEE OF THE REGIONS**

Assessment report of the Member States' national Roma strategic frameworks

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INTRODUCTION

All EU Member States were invited to develop and adopt national Roma strategic frameworks (NRSFs) according to their national contexts and circumstances, also taking into consideration the size of Roma population living on their territories, the EU Roma Strategic Framework for equality, inclusion and participation¹ and the commitments made in the Council Recommendation².

The Commission services analysed the information provided in each NRSF to assess to which extent the measures included in the NRSFs reflect the particular challenges of the respective Member State, and whether the measures are ambitious enough to help meet the EU Roma Strategic Framework's headline targets by 2030.

This Staff Working Document (SWD) provides the country specific assessment of the NRSFs, in the form of country fiches. These country fiches reflect the structure of the Council Recommendation, and assess for each Member State the correspondence of their main proposed measures with the EU Roma Strategic Framework and the Council Recommendation. The country fiches also highlight areas for improvement.

The SWD also includes two appendixes. Appendix 1 presents a table prepared by EU Fundamental Rights Agency (FRA) which provides an overview of targets set by Member States. Appendix 2 presents a summary of the Roma Civil Monitoring Preparatory Action's assessment of Member States' NRSFs.

¹ [EU Roma Strategic Framework for equality, inclusion and participation](#)

² [Council Recommendation on Roma equality, inclusion and participation](#)

AUSTRIA

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	Strategy for the continuation of Roma inclusion in Austria (07-04-2021, extending the ongoing strategy of 28-06-2017 to the end of 2023)
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 35,000; 0.42% of total population
National Roma Contact Point (NRCP)	Austrian Federal Chancellery

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
The NRCP has a staff of two persons. Its institutional role as part of the Austrian Federal Chancellery is to coordinate with ministries and other stakeholders with regard to the implementation and monitoring of Roma equality and inclusion measures and to contribute to mainstreaming Roma equality and inclusion in relevant sectoral policies. Dialogue with civil society is facilitated through a National Roma Platform supported with EU funding. The NRCP follows national strategies, policies and processes in relevant fields and liaises with line ministries and public authorities to ensure that specific needs and challenges faced by Roma people are explicitly addressed in mainstream policies. An external evaluation of the ongoing strategy was carried out in the course of 2022, and published on 4 October 2022.	Further strengthening of trust with Roma civil society has been identified by the NRCP as a continuous challenge and area for improvement. This challenge is being addressed by regular involvement of Roma and pro-Roma civil society in discussions, consultations, monitoring and evaluation of relevant processes and measures.

HORIZONTAL OBJECTIVES

1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION

1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA

KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF defines the fight against antigypsyism as one of seven priority objectives, linking it to five qualitative targets. Measures in this area include conferences and workshops, as well as anti-discrimination training for future police officers.	More focus could be given to victims' support, to preventing and combating anti-Roma hate speech and hate crime, as well as to addressing multiple and structural discrimination. Baselines, targets and indicators could be defined more closely in line with EU level objectives and targets.

Racist and xenophobic motivations of criminal acts are recognised by law as an aggravating circumstance. Specific measures in this area include monitoring and recording of such crimes. Qualitative targets include a strengthened awareness and sensitisation of majority society, including public servants and media representatives, enabling Roma, in particular Roma youth, to access the media-related labour market, and the professionalization of the media and public relations work of Roma Civil Society Organisations (CSOs).	
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
Measures include the creation and continuation of museum exhibitions as well as education modules on Roma culture and history, Roma and Sinti celebration and commemoration events, development and dissemination of teaching materials on Roma history in several languages including Romani, and the embedding of the non-discrimination principle in teacher training. The NRCF also supports a school mediation CSO project raising awareness about Roma culture and history, facilitating dialogue and communication between teachers, pupils and parents, and assisting parents in educational matters.	More focus could be given to promoting positive narratives about Roma and Roma role models in mainstream society and Roma communities, in order to foster a better understanding of the challenges faced by Roma and to inspire Roma youth.
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
In this area, the NRSF focuses on mainstream policies and schemes, as well as on targeted sectoral measures, in particular in the area of education as the basis for inclusion and labour market access. A qualitative target is included on ensuring that Roma with low income are not put at existential risk.	More explicit focus could be given to ensuring effective equal access for Roma to mainstream social protection safety nets. Baselines, targets and indicators could be defined more closely in line with EU level objectives and targets.

3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes Roma participation among its seven objectives. Measures include regular National Roma Platform meetings, exchanges with civil society on annually changing themes through regular expert workshops, and regular communication with CSOs through e-mail distribution lists. The NRSF includes a specific objective on Roma women and girls, and an objective on empowering Roma youth. Qualitative targets include empowerment and equal participation opportunities for Roma women and girls in all social spheres, strengthening civil society organisations, and empowerment of Roma youth.	More focus could be given to investing in capacity-building for Roma CSOs and promoting employment of Roma people in public and private institutions. Baselines, targets and indicators could be defined more closely in line with EU level objectives and targets.

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	The NRSF includes measures targeting all young people with a migrant background or a weak socio-economic background, such as promotion of early childhood education and care, facilitating the transition from early childhood education to primary school, language learning as well as counselling and support to prevent early school leaving and facilitate the transition from education to employment. Targeted measures include bilingual and native language education in Burgenland, involvement of Roma civil society in the work of the Forum on Minority Schools, development of specific mediation capacities in schools, as well as involvement of parents and Roma civil society in mediation and counselling efforts. The NRSF defines qualitative	Targeted support measures – such as school mediation, assistance to parents, bilingual and native language education – could be scaled up and replicated. Further focus could be given to measures specifically promoting effective and equal access to education for Roma girls and women. In the post-2023 NRSF, baselines and targets could be defined closely in line with EU level objectives and targets, while making a best use of the EU portfolio of indicators.

	targets such as strengthening equal opportunities and gender equality in education, increased participation in early childhood education and care, higher educational achievements of disadvantaged groups, and a reduction in early school leaving.	
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	Targeted measures to promote access for Roma to the labour market include continuing education – such as language and literacy courses, and qualification measures – as well as job counselling, coaching, and infotainment events. The NRSF also includes awareness-raising actions aimed at employers, trade unions, teachers and media, as well as job counselling for young Roma. The NRSF includes qualitative targets, such as better access to the labour market and reduction of obstacles, as well as ensuring that Roma with low income are not put at existential risk.	In the post-2023 NRSF, baselines and targets could be defined closely in line with EU level objectives and targets, while making a best use of the EU portfolio of indicators. Further focus could be given to ensuring effective and equal access for Roma women to employment and addressing the gender employment gap among Roma.
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	Overall, Austria has a well-functioning health system, with near universal health insurance coverage. The NRSF sets out the objective of ensuring discrimination-free access for Roma to education, employment, health and housing in general terms. It refers to inclusive mainstream health policies taking into account the needs of Roma and aiming to support access to healthcare for disadvantaged groups. Some measures contribute to health objectives, such as the introduction of low-threshold health and social counselling services for Roma	The NRSF does not contain a specific objective or set of measures concerning the health sector. The post-2023 NRSF should address the area of health policy through setting out a specific objective and measures to improve the health situation of Roma people and ensure their effective equal access to healthcare, while taking into account the needs of specific groups within the Roma population, including women and children, supported by adequate data. In the post-2023 NRSF, baselines and targets could be defined closely in line with EU level objectives and targets, while making a best use of the EU

	women and girls.	portfolio of indicators.
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	The NRSF refers to mainstream inclusive housing policies taking into account the needs of Roma and aiming to support access to housing for disadvantaged groups.	The NRSF doesn't contain a specific objective or set of measures to ensure effective equal access of Roma to housing. The post-2023 NRSF should address the area of housing through setting out a specific objective and measures to ensure effective equal access of Roma to housing, based on a comprehensive needs assessment and adequate data. Baselines and targets could be defined closely in line with EU level objectives and targets, while making a best use of the EU portfolio of indicators.

MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	The NRSF does not define baselines.	In the post-2023 NRSF, national baselines could be defined towards the EU Roma Framework's objectives and targets.
TARGETS	The NRSF defines qualitative targets in several areas; however, these are not closely linked to EU level targets.	National targets could be defined more closely in line with EU Roma Framework's objectives and targets, based on a comprehensive needs assessment.
INDICATORS	The NRSF does not define indicators.	Indicators could be defined closely in line with the EU level targets, building on the EU portfolio of indicators.

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	Since 2012, the NRCP has been organising regular meetings of the National Roma Platform to contribute to monitoring and reviewing the implementation of national Roma strategy as well as of ongoing policies of relevance and further contribute to the adjustment or development of new measures. Regular thematic workshops are also conducted.	While the ongoing NRSF does not explicitly refer to the involvement of the equality body for equal treatment, the post-2023 NRSF could indicate specifically the nature and level of involvement of the equality body.

		The National Roma Platform includes representatives of Roma civil society, line ministries and local authorities. The NRSF aims to further strengthen links between the Platform and local integration fora.	
	MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS	To ensure the link with mainstream sectoral policies, the NRCP follows relevant policies and processes and contributes to addressing Roma specific challenges both through mainstream and targeted measures. The NRSF refers to relevant EU initiatives in some areas, such as Erasmus+ and the Youth in Action programme. Empowerment of Roma women, girls and youth are included as priority objectives in the NRSF and connected to specific measures, such as an edition of the National Roma Platform dedicated to youth empowerment, as well as a Girls Week implemented by a CSO.	A stronger focus could be given to addressing the needs of specific groups, in particular Roma women and girls, in sectoral policy areas such as health, including by investing in capacity building of Roma women and youth and of their civil society organisations.
FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	Actions funded under the ESF 2014-2020 include targeted measures to promote access of Roma to employment (with a total budget of EUR 8 million), as well as mainstream measures explicitly including Roma among the target groups in the areas of education and social inclusion.	It could be further clarified to what extent Roma and pro-Roma civil society participates in the preparation, implementation, monitoring and evaluation of programmes.
	OTHER SOURCES OF FUNDING	The NRSF refers to measures funded by federal ministries, provinces and municipalities, but does not specify amounts. As of 2021, the federal budget for national minorities allocated by the Federal Chancellery was more than doubled.	It could be clarified further which share of the national funding instruments referred to in the NRSF will benefit Roma equality and inclusion.

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

The Austrian National Roma Platform, which has been meeting regularly since 2012 and contributes to monitoring and reviewing the implementation of the national strategy and relevant policies, as well as to the development of new measures, can be highlighted as a positive example of a national dialogue process.

The Roma school mediation project, which includes actions to raise awareness about Roma culture and history, facilitate dialogue and communication between teachers, pupils and parents, and assist parents in educational matters, can be highlighted as a positive example.

Bilingual and native language education activities for Roma pupils that are implemented regionally appear promising and could be further scaled up.

BELGIUM

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	National strategy for Roma integration 2021-2030
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 30,000; 0.29% of total population
National Roma Contact Point (NRCP)	Anti-poverty department of the Federal Public Service for Social Integration

KEY FEATURES	AREAS FOR IMPROVEMENT
The NRCP is responsible for the cross-sectoral coordination for the development and implementation of the National Roma Strategic framework (NRSF). This coordination entails the responsibility of the annual monitoring and reporting of the implementation of the NRSF, as well as formulating recommendations on changes and reorientations to the NRSF. These recommendations will be based on a broad stakeholder consultation within the National Roma Platform. The NRCP also ensures the coordination and consistence between the NRSF and the EU Roma Framework. A Belgian Roma Platform was launched with the support of the European Commission in May 2016. The platform aims to support the NRCP in promoting a participatory dialogue process with all stakeholders and Roma communities in Belgium.	It is unclear from the NRSF whether the NRCP has enough staff and resources to mainstream Roma equality and inclusion, and weigh on policy decisions which are relevant for Roma. This is all the more important as the NRCP has to articulate its coordination between the different levels of government in Belgium, since policy interventions lie at the intersection of different policy areas and governments such as employment, housing, education and health.

HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF articulates the fight against discrimination and antigypsyism around awareness-raising among the Roma people of the equality body to ensure reporting of hate speech and hate crime, and promotion of positive narratives about Roma. At national level, the NRSF is linked with the National Action Plan against Racism (NAPAR) currently being developed. A number of proposals for actions will be integrated into the NRSF once the negotiations on NAPAR have been concluded. Following the “Conference to Combat Racism” held in 2021-2022 in the Brussels Parliament, 207 recommendations were issued to the Brussels Government, amongst which specific recommendations for Roma. As a follow-up, the NRSF proposes an action in Brussels, aiming at analysing how recommendations issued in particular to tackle challenges faced by Roma can be implemented. One of these recommendations is about emphasising the need for specific training and meetings, in particular with the equality body. The Brussels anti-racism action plan is being drawn up on these bases. Flanders, Wallonia, and the German-speaking community are also involved in the development of the national anti-racism action plan.	The NRSF mentions equality bodies and data collection but more concrete measures could be proposed to develop baselines. It remains to be seen, once the Belgian action plan against racism is adopted, how hate crime, and hate speech offline and online against Roma will be addressed and integrated into the current NRSF.
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
Positive narratives about Roma and Roma role models were promoted in 2021 through the mobile exhibition “Reflections. Roma in Belgium” organised through the National Roma Platform. This exhibition opened in the Kazerne Dossin Holocaust Memorial site, from which about 353 Roma were deported to Auschwitz.	Actions such as the exhibition “Reflections: Roma in Belgium” can be continued and expanded to reach the broadest audience possible. The NRSF does not mention any measure of remembrance of the arrest and deportation of Roma from Belgium, although the National Platform exhibition acknowledges it by choosing Kazerne Dossin to open the exhibition on Roma.

2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF proposes mainstream inclusion plans (for migrants and foreigners in Wallonia) and mediation. Policy interventions in the fight against poverty lie at the intersection of different policy areas such as employment, housing, education and health. Consultation forums on combatting poverty and social exclusion –also tackling the aspect of Roma inclusion– are organised through open platforms which meet several times a year at the initiative of the SPP Social Integration. In Flanders, however, a targeted measure is in place in the form of neighbourhood mediators who work on the social inclusion of Roma families. Acting as intermediaries between the Roma population, the communal and social services, the mediators inform service providers about Roma background and provide support to facilitate access to these services in accordance with Roma habits and culture. An annual budget of EUR 800,000 shall be made available for this mediation purpose. From 2022 onwards, an integrated approach will be applied, as stipulated in the Policy Plan for Horizontal Integration and Equal Opportunities 2020-2024. It is a targeted action plan, of which main objective is to promote full/proportional participation in society, e.g. “achieving equal opportunities for disadvantaged or excluded social groups”.	The NRSF does not mention any target for this objective, nor the use of indicators.
3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
Besides the National Roma Platform at federal level, the NRSF lists regional supports in Wallonia, Brussels, Flanders, and the German-speaking community, which focus mainly on supporting inclusion via language courses and cultural activities for Roma and Travellers, and via intercultural mediators, as is the case in Flanders and Brussels through the non-profit organisation ‘le Foyer’, subsidised by the	Although the NRCP is composed of institutional representatives of regional level of competences the articulation of the coordination of the strategy and of the National Roma Platform is not clear from the NRSF. The NRSF does not determine how Roma civil society will contribute to the monitoring and evaluation of the actions proposed in the strategy.

Common Community Commission (COCOM).	
In Wallonia, the French Community Commission (COCOF) promotes the social and socio-professional projects of Travellers and encourages citizens' participation by Travellers and their associations.	

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	Education is a community-level competence in Belgium. Therefore, the measures vary according to the region/community. In Wallonia, targeted measures are in place via the “Centre de Mediation des Gens du Voyage et des Roms”, a body recognised by the Walloon Government, which organises French and IT classes for the children of travellers during their stay. The organisation also ensures the work of the Roma mediators, and support and counselling for Roma pupils. The Roma and “Gens du voyage” Service of the “Foyer” organisation, supported by the Flemish Community Commission aims to promote the schooling of Roma children. To this end, they work on: awareness raising, guidance, enrolment, school mediation, increasing parental participation and supporting teachers and pupils. Mainstream measures include the “Fight against school failure” subsidised by the Wallonia-Brussels Federation, and the support for migrant and asylum-seekers in the German-speaking community.	The NRSF does not provide any concrete measures with targets and indicators to address early-school leaving, in particular for Roma girls, who are not specifically mentioned, although the NRSF states that gender equality will be a horizontal axis for all objectives. Measures to support early childhood education and care could be developed.
5. INCREASE EFFECTIVE	The NRSF mentions several awareness and activation	The NRSF does not address the significant gender gap in

EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	programmes launched under the “ESF 457 Awareness and Activation call”, either targeted for Roma, or more generic in Flanders, and the continuation of the job search service provided by the “Centre de Mediation des Gens du Voyage et des Roms” in Wallonia. In Brussels, support for Roma work is included in the 2022-2025 multiannual plan of the Flemish Community Commission, which finances the Roma activities of the “Foyer” NGO. This includes support for Roma mediators and Roma@work projects, which are also funded through ESF, and which aims at supporting Roma in their job search through qualifying training and coaching sessions. The current call for Roma@work runs until 31 December 2022 and is extended for the year 2023. A grant of EUR 161,000 is awarded for the year 2022. The German-speaking community ensures equal access to activation programmes, such as “AktiF and AktiF-Plus”.	employment in the Roma population.
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	The NRSF mentions the Community Health Workers (CHW) initiative from the Federal Public Service for Public Health which aims to promote access to healthcare in the context of the COVID-19 pandemic. The CHW currently employs fifty Community Health Workers whose main tasks will include improving access to healthcare, especially in times of crisis; supporting vulnerable groups in healthcare and highlighting inequalities and structural	The NRSF mostly informs about current initiatives/practices in place, but not about measures envisaged to further address specific health access challenges faced by the Roma population. The specific challenges of the Travellers, otherwise covered under other objectives, are not mentioned under this objective in the NRSF, nor is there any mention of specific health challenges of women, in relation to reproductive health for example.

	accessibility issues within the healthcare system, with a focus on the consequences of COVID-19. In the Brussels region, the Flemish Community Commission (COCOM) has collaborated with the National Roma Platform to inform Roma mediators on access to healthcare.	
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	The NRSF mentions measures subsidised by the COCOM in Brussels, or the Walloon regional budget in Wallonia primarily aiming at increasing the number and legalisation of sites for travellers, as well as providing them with proper infrastructure. Other measures include listing the temporary sites for the Travellers, obtaining a temporary address to ensure their access to rights. A “Housing First” project is being launched in Wallonia to facilitate access to affordable housing. The Mediation Centre is developing, where possible, a partnership for the rental of vacant dwellings at moderate rents, as financed by the Decree of the Walloon Government of 18 July 2019, which includes provisions on assistance to Travellers in the Walloon Regulatory Code for Social Action and Health. According to the Decree of 2 May 2019 on travel assistance, Wallonia will support municipalities which organise hosting Travellers by means of flat-rate subsidies. These hosting initiatives, amounting to EUR 30,000 per year, are intended to organise missions to welcome and assist travellers residing there.	The needs assessment of the NRSF is based mainly on FRA surveys. Although the NRSF mentions the creation of data necessary to monitor the measures within the legal limits which prohibit the collection of ethnic data, there is not enough detail on the situation of Roma across the distinct regions in Belgium to estimate how pertinent and ambitious the various regional initiatives are.

MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	The NRSF provides a needs assessment –using the data from the 2019 FRA Roma and Travellers Survey– in priority areas.	The NRSF does not set up any other baseline than the FRA Survey.
TARGETS	The NRSF includes national qualitative targets – in the form of Actions.	Targets could be defined more closely in line with the EU Roma Framework’s objectives and targets.
INDICATORS	The NRSF uses qualitative national indicators.	Indicators could be defined closely in line with the EU level targets, building on the EU portfolio of indicators.

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	The NRSF places the NRCP as the central piece to enhancing cooperation and involvement of the local authorities.	The NRSF does not provide information on how the NRCP will cooperate with the local and regional authorities.
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS	The National Action Plan for the Belgian Child Guarantee is mentioned in the NRSF as paying special attention to the needs of Roma and Travellers children. The NRSF mentions being in line with the Commission’s work in other areas, such as the EU Anti-Racism Action Plan 2020-2025, the Victims’ Rights Strategy, the EU Gender Equality Strategy, and the UN Sustainable Development Goals. The NRSF takes into account specific needs of different groups such as the EU mobile Roma.	It is unclear from the NRSF whether the NRCP ensures the mainstreaming of Roma equality and inclusion at national level.
FUNDING CONNECTION WITH EU PROGRAMMES (instruments)	Since 2015, the Flemish Community Commission (promoter) and the Roma and “Gens du voyage” Service of Foyer asbl (Partner) have been focusing on providing guidance and support for Roma towards vocational training	The continuation of the Roma@work project beyond 2023 could be ensured through ESF+ funds, as this project is mentioned as an initiative yielding positive results.

		and employment. This action is carried out within the framework of the ESF Roma@work project and is being continued within the new NRSF until 2023.	
	OTHER SOURCES OF FUNDING	Flemish authorities and VDAB Brussels. Funds mobilised through the Decree of the Walloon Government of 18 July 2019 inserting provisions on assistance to Travellers in the Walloon Regulatory Code for Social Action and Health.	In order to see through the implementation of the planned measures, targeted budgetary allocations should be made.

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

The diversity of the Roma population is reflected and taken into account through the specific support for the Travellers, in particular in relation to education.

The work done by the Belgian Roma platform to promote positive narratives about Roma in the framework of the exhibition “Reflections. Roma in Belgium”, can be considered as a promising practice which could usefully be repeated and expanded. The coaching and training to support Roma in their job search carried out in the framework of the Roma@work projects, funded through ESF, is a good approach which the Commission encourages to continue beyond 2022 with ESF+ funds.

The subsidies programme for municipalities to welcome Travellers in Wallonia can be a good practice which deserves to be further expanded.

BULGARIA

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	National Strategy of the Republic of Bulgaria for Equality, Inclusion and Participation of the Roma (2021-2030) National Action Plan for the period 2022-2023
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012) : 750,000; 9.94% of total population National census (2021): 266,720 In line with the EU Roma Framework’s common but differentiated approach, this Member State was invited to make more ambitious commitments to Roma equality, inclusion and participation than other Member States.
National Roma Contact Point (NRCP)	Secretariat of the National Council for Cooperation on Ethnic and Integration Issues.

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
Under the administration of the Council of Ministers, the NRCP has a staff of four persons. With an annual budget up to BGN 60,000 (ca. EUR 30,000), it is equipped with a mandate to monitor	The NRSF could have indicated more clearly whether the capacity of the NRCP will be further strengthened, as proposed by the Council Recommendation.

the implementation of Roma-related measures and report progress to the National Council. It acts as a coordinating structure of activities at national level in the formulation, implementation, monitoring and evaluation of integration policy. A mechanism for inter-institutional coordination with line ministries and agencies has been established. Line ministries report annually to NRCP their progress on implementing Roma-related measures via the System for Monitoring, Evaluation and Control. The NRCP takes part in the work structures for programming and implementation of EU Partnership Agreement with Bulgaria and programmes of EU structural funds for 2021-2027 and is part of their monitoring committees.	There are no indications whether the T.E.A.M 3 project ongoing until 2023, which supports the National Roma Platform (NRP) will be continued from national sources to retain this level of institutional capacity, or whether the NRP will be reformed in any way.
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HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes the horizontal objective “Effective equality: Fight to prevent manifestations of anti-Roma attitudes and discrimination against the Roma in general”. The Action Plan’s operational goal focuses on guaranteeing the rights of citizens, with an emphasis on women and children, protection of public order, prevention and counteraction to the manifestations of intolerance and hate speech. Measures include: strengthening of inter-institutional dialogue and co-operation to support minors at risk; training of police officers to work with victims of violence; solving the problem with the lack of identity documents for vulnerable communities, including Roma. The Action Plan includes output indicators on numbers for all objectives (e.g. number of participants, beneficiaries, number of activities, events, projects). The NRSF sets national targets that cover issues addressed by the EU level targets as included in the EU Roma Framework on cutting the proportion of Roma with discrimination	The NRSF does not make references to antigypsyism specifically but to anti-Roma attitudes. While the aspects of hate speech and hate crime are included, the proposed measures lack in ambition. There are no measures specified addressing the aspect of structural and multiple discrimination. Measures on anti-discrimination are rather weak, lack in ambition and focus mainly on awareness raising activities. The NRSF include only output indicators (number of persons), which will make it more difficult to measure the outcomes of the implemented measures.

experience by at least half.	
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
Under its objective on Culture and Media, the NRSF includes the operational goal: Improving the conditions for equal access of the Roma community to public cultural life, preservation and promotion of Roma traditional culture, development and promotion of creativity as factors for cultural integration and social cohesion. The operation goal includes measures aimed at preservation and promotion of the traditional culture of the Roma community; stimulating the Roma community to actively participate in public cultural life and promoting intercultural dialogue; de-ethnicisation of the phenomena of poverty in the Bulgarian public media.	Although the NRSF includes an objective on culture and media, underlining the crucial role of the media in reducing anti-Roma attitudes, and has set out under its operational goals to fight against xenophobia, racism, anti-Roma attitudes and hate speech in the media, as well as the preservation and promotion of Roma traditional culture, the Action Plan lacks specific measures to implement activities in this area. Measuring progress in these areas may prove to be difficult. Targeted measures to promote representation of Roma and their participation through radio and television broadcasts are lacking, as well as measures to promote positive narratives about Roma and Roma role models.
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes the horizontal objective “Socio-economic inclusion: Reduction of poverty and social exclusion and elimination of socio-economic differences between the Roma and the rest of the Bulgarian society”. While socio-economic inclusion is not being covered distinctly under this horizontal objective, it is addressed across sectoral priorities on employment, health, rule of law and anti-discrimination, and housing conditions. The NRSF includes national targets responding to the EU level target included in the Framework (cutting the poverty gap between Roma and general population by at least half, and cutting the poverty gap between Roma children and other children by at least half.)	Although the NRSF mentions the issue of poverty extensively and has set targeted measures to reduce poverty and address social exclusion, they are insufficiently developed. Given the large number of Bulgarian Roma living in extreme poverty, as acknowledged in the strategy, a solid poverty-reduction package of measures should be developed and implemented, making a best use of EU funding. The baseline for used indicators is 2019. The values can be updated with 2020 data from FRA/BNSI survey (data available).
3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes the horizontal objective “Significant participation: Encouraging participation through empowerment, cooperation and trust.” It has a dedicated section on Roma women with a focus on promoting their equality and participation in public life.	Although participation is mentioned throughout the NRSF and Action Plan, it is not set as a distinct area for action. The NRSF lacks targeted measures to support empowerment, capacity building and meaningful participation of Roma.

The NRSF sets a national target (doubling the proportion of Roma who file a report when they experience discrimination) responding to the EU level target included in the Framework.	
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SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	The NRSF includes the objective “Increasing effective access to quality inclusive education”, detailing measures in the Action Plan. Each of the sectoral objectives include priorities and general objectives. Measures focus on creating conditions for the implementation of quality and inclusive education, including for vulnerable groups, and Roma; educational desegregation and prevention of secondary segregation, and work with parents. The NRSF includes a number of education-related indicators with baselines and national targets responding to the following EU level target included in the Framework: - cut the gap in participation in early childhood education and care by at least half; - reduce the gap in upper secondary completion by at least one third; - work towards eliminating segregation by cutting at least in half the proportion of Roma children attending segregated primary schools (in Member States with significant Roma population).	While the NRSF often refers to existing mainstream frameworks and horizontal measures addressed to all students and children, it lacks specific targeting of Roma. There are no measures to support the engagement of more Roma teachers and education mediators in schools with a larger number of Roma children. The baseline for some of the indicators is rather outdated (2019), and uses target values at the level of the whole population, lacking specific values about Roma. The values can be updated with 2020 data from FRA/BNSI survey (data available).
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY	The NRSF includes the objective “Increasing effective access to quality and sustainable employment” detailing measures in	NRSF and Action Plan indicate mainly mainstream programmes and measures, lacking details of how they will be applied to Roma. Measures to

AND SUSTAINABLE EMPLOYMENT	the Action Plan's operational goal on equal access of Roma on the labour market, reduction of social inequalities and active social inclusion. Measures include: promoting employment through vocational guidance and training of unemployed; provision of employment, including through entrepreneurship for Roma. The NRSF includes employment-related indicators with baselines and targets responding to the EU level target included in the Framework (cut employment gap by at least half; cut gap in NEET rate by at least half; cut gender employment gap for Roma by at least half).	address discrimination in accessing employment are not sufficiently articulated. Most of the used indicators do not seem to be Roma specific but indicators covering the whole population.
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	The NRSF includes the objective "Improving the health status of the Roma and increasing the effective access to quality health and social services". Measures under this objective are detailed in the Action Plan's operational goal on ensuring equal access to quality public health and improving the health of the population in vulnerable communities, with a concentration of poverty. Measures include: improving maternal and child health in vulnerable communities; reducing stigma and discrimination against people from vulnerable groups; implementation of protection against vaccine-preventable infectious diseases, training of health mediators. The NRSF includes a number of health-related indicators with baselines and targets (Cut life expectancy gap by at least half)	Although the set measures cover a wide range of health-related areas and needs, the action plan lacks specific measures to address discrimination and obstacles limiting access of Roma to health care services. A mainstream indicator of life expectancy is used in the NRSF, however, it is not mentioned in the Action Plan.

	responding to the EU level target included in the EU Roma Framework.	
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	The NRSF includes the objective “Increasing effective access to adequate desegregated housing and basic services”. The Action Plan’s operational goal focuses on improving housing conditions, including adjacent technical and public service infrastructure. Measures for this objective include: establishment of a working mechanism for evaluation of the housing stock in areas with compact Roma population; providing support under priority “Housing Conditions” to fifty urban municipalities in the country; providing conditions for the acquisition of affordable housing and introduction of alternative models of social housing for households in poverty areas; adopting an Act amending the Spatial Planning Act to introduce the principle of proportionality in issuing an order for the removal of illegal construction; expanding access to quality water, electricity and sewerage in separate neighbourhoods. The NRSF includes a number of housing-related indicators with baselines and targets responding to the EU level headline targets included in the EU Roma Framework (reduce gap in housing deprivation by at least one third; cut gap in overcrowding by at least half; ensure that at least 95 % of Roma have access to tap water).	The NRSF does not include a solid dimension on provision of social housing for vulnerable Roma. The NRSF and action plan lack concrete measures to address the issue of housing segregation of Roma. It does not include specific desegregation measures.

MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	The NRSF includes a baseline and measurable targets. Data on implementation of the Strategy is also collected on a territorial basis for settlements with a concentration of poverty. The NRSF uses data as produced by the National Statistical Institute. The NRSF refers to a System for monitoring, evaluation and control of the implementation of the strategy, including at regional and local level.	Although the NRSF refers to the existence of a baseline, the word itself appear only few times through the NRSF and Action Plan. Moreover, sources of data are lacking from the Action Plan. It is not sufficiently clear which are the values provided for baselines or targets, except the sources included in the appendix of indicators for monitoring, which are (National Statistics Institute) NSI, BG-SILC, and one survey.
TARGETS	The annex “Indicators for monitoring the implementation of the National Strategy of the Republic of Bulgaria for Equality, Inclusion and Roma Participation (2021-2030)” contains a list of indicators with quantitative targets for EU Roma Framework’s objectives. The NRSF sets out baselines and targets based on a description of the situation. Most targets set in the NRSF respond to the EU level targets included in the Framework.	While the NRSF states the magnitude of the challenges affecting Roma, it is not sufficiently clear on the sources and level of resources projected to address them. The link between the measures and targets is rather weak. Targets contained in the Strategy’s Annex of indicators for monitoring are not included in the Action Plan. The Action Plan includes target values which are outputs of measures that are not linked directly to the targets contained in the Annex. More consistent and substantial usage of data should be considered in the next revision of the NRSF and its Action Plan.

INDICATORS	The NRSF provides in an Annex a list of indicators for monitoring implementation of the strategy, linked with targets.	Although the indicators in the NRSF Annex are linked to quantitative targets, the indicators included in the Action Plan are only connected to measures and not to targets, and are input indicators (number of reports, meetings, participants, plans, etc.). Moreover, many of the indicators are at the level of the general population and seem to be outdated (2019). Values can be updated with 2020 data from FRA/BNSI survey. Improvements are needed regarding indicators and their correlation with baselines and targets, while more efforts should be made to develop Roma specific indicators.
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OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	The NRSF includes a number of measures aimed at promoting participation of Roma as well as facilitating co-operation between NRCP, the Roma civil society and other relevant stakeholders. Cooperation with the Roma civil society and all other relevant stakeholders is envisaged through the formation of advisory councils and civic monitoring, including of young people and Roma women; establishment of a Council for monitoring the implementation of the strategy; collection, systematisation and analysis of information on good practices for monitoring of sectoral policies. The NRSF dedicates a section for empowerment and equal opportunities for Roma women.	The NRSF does not make sufficient references to the involvement of the equality body. The National Roma Platform is mentioned mainly in the context of co-operation with the government in the development of the strategy. No other references are made to engagement with Roma organizations during implementation, or for monitoring, evaluation and reporting of the NRSF. While NRSF refers to capacity building of Roma organisations, the Action Plan is missing measures in this regard. The NRSF refers in its national context and analysis section to the need for institutions to step up efforts to combat discrimination, hate speech and hate crimes, however, objectives and measures in this regard are not sufficiently articulated. Plans in this area are unclear, which will make measuring of progress difficult.

MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS		The strategy follows an approach based on the development of common policies (mainstream) with the implementation of targeted measures by sector, especially at local level. The targeted approach is designed to compensate for inequalities. The NRSF mentions the importance of targeted support for marginalised groups such as the Roma, underlining the fact that Roma are a potential force for the labour market, and that the implementation of its measures will contribute to the indicators of various mainstream priorities and programmes.	The NRSF does not provide clear indications about how Roma issues are specifically mainstreamed in the public policies, and extent to which Roma will benefit of them.
FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	The NRSF relies on coherence between EU funding instruments, e.g. Europe 2020, cohesion policy funds and complementarity with other strategic documents and national programs. NRSF measures are built on the basis of use of resources at national, regional and local level, as well as those at European level (e.g. accessing funds of the EU for the programming period 2021-2027). The NRSF indicates that Bulgaria will receive funds from ESF+, the “Human Resources Development” Programme, the “Food and Basic Material Support” Programme and the Programme “Education”, as well as the ERDF.	While the NRSF indicates a number of measures as being funded under EU cohesion policy funds, and European Economic Area Financial Mechanism (EEA FM) 2014-2021, it is not clear whether those funds will be continued beyond their announced timeframe, or continued through other programmes, either EU or state-funded.
	OTHER SOURCES OF FUNDING	State budget; municipal budgets; Norwegian Financial Mechanism (NFM) 2014-2021; other donor programs.	Financial resources mentioned in the Action Plan are only indicative for now, and their quantum remains to be confirmed later, during the implementation process, depending on approved budgets per institution and municipality.

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

Young unemployed under the age of 29 (among them Roma) are one of the priority target groups of mainstream active labour market policies. Early support to young people will be provided through the implementation of the new EU Council Recommendation “Job to Jobs - Strengthening the Youth Guarantee”.

With a view to expanding its network of health mediators appointed on a delegated budget, the Ministry of Health has adopted the Ordinance No 1/19.07.2020 on the requirements for the activity of health mediators. The measure was taken in order to overcome an existing risk of uneven distribution of mediators due to a possible lack of appointment of health mediators by targeted municipal administrators and to ensure that concerned neighbourhoods will not be left without health mediators.

CROATIA

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	National Plan for Roma Inclusion 2021-2027 Action Plan
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 35,000; 0.79% of total population National census data (2017): 24,524
National Roma Contact Point (NRCP)	Office for Human Rights and Rights of National Minorities of the Government of the Republic of Croatia

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
The NRCP has resources, staff capacity and institutional authority in order to effectively coordinate efforts with the line ministries and relevant authorities and monitor implementation of national policies for Roma equality inclusion and participation, including outreach at local level. A Commission was established for Monitoring the Implementation of the National Roma Program. The NRCP is involved in the coordination of cross-governmental discussions on the distribution of EU funds for Roma, and in systematic monitoring of their use.	Roma were involved in the drafting of the National Roma Programme with a focus on childcare, employment, social welfare, protection of families, motherhood and youth, physical planning and others. The capacity of the Roma Civil society is very limited and needs substantial investment and empowerment.

HORIZONTAL OBJECTIVES

1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION

1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA

KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF contains measures, indicators and data used to measure progress in the horizontal objective of combatting anti-Roma racism and discrimination.	The effective practical enforcement of antidiscrimination legislation to combat anti-Roma manifestations is not properly presented in the strategy.

Specific measures provide for reducing the number of Roma who have experienced discrimination and hate crime and fostering integration processes and strengthening social cohesion between the Roma and the majority population. Related activities include promoting a comprehensive system of support and assistance to victims of discrimination and hate crimes, promoting positive speech about Roma, as well as raising awareness of Roma cultures, language and between the Roma and majority population. The NRSF sets national targets responding to the EU level target included in the Framework (cut the proportion of Roma with discrimination experience by at least half; and decrease the proportion of general population who feel uncomfortable having Roma neighbours by at least a third).	
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1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes activities aimed at raising awareness on Roma cultures, language and history, including remembrance of Roma victims of the Holocaust and reconciliation processes, including the provision of appropriate teacher training and the development of an appropriate school curriculum, considering that such awareness is key to reducing prejudice and anti-Romani sentiment.	Promotion of positive narratives about Roma and Roma role models could be envisaged at a larger scale. The strategy does not present foreseeable actions for the recognition at national level of the Holocaust Memorial Day.
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
In order to reduce poverty and social exclusion, the NRSF foresees activities combining income support and incentives to promote labour market participation as well as supporting financial literacy for young adults. The Plan focuses particularly on combatting and preventing child poverty by co-financing access to basic services, education, nutrition and leisure activities. Targets, aligned with EU targets, include reducing the share of Roma at risk of poverty from 93% to under 15% and the share of Roma children from 95% to less than 50%.	

The NRSF sets national targets responding to the EU level target included in the Framework (Cut poverty gap between Roma and general population by at least half; and cut poverty gap between Roma children and other children by at least half).	
3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
The Action Plan includes measures fostering active citizenship by promoting social, economic, political and cultural participation, including of women and young people in the Roma community, promoting capacity building of Roma civil society organisations, including Roma youth and women's organisations, supporting the employment of professionals from the Roma community in public institutions to enhance diversity and expertise, and raising awareness of members of marginalised Roma communities about human rights and the rights and responsibilities of citizens. The NRSF sets national targets responding to the EU level targets included in the Framework (capacitate and engage at least 90 NGOs in EU wide coordinated Roma civil society monitoring; ensure participation of Roma NGOs as full members in national monitoring committees for all programmes addressing needs of Roma communities; double proportion of Roma who file a report when they experience discrimination; Encourage participation of Roma in political life at local, regional, national and EU levels).	Roma civil society is rather weak and therefore specific measures to empower and build its capacity are necessary. This could be directly linked to a very low level of awareness of the Roma communities about the existing possibilities but also limited reach-out of the NRCP to these communities.

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	The Action Plan contains measures such as the development and dissemination of inclusive teaching through mentoring and mutual learning, the training of teaching staff on Roma history and culture, ensuring Roma pupils acquire skills in line with the labour market needs, investing in preschool education and reducing	There is a need to further develop and implement activities to promote the acquisition of digital skills, ensure broadband access, suitable digital infrastructure and the provision of teaching materials for distance learning, both in formal and non-formal education, for Roma students and their teachers, facilitators and parents,

	early school leaving with an emphasis on Roma girls and supporting the participation in extracurricular and well-being activities. Regarding the measures against segregation in education, these are strongly present at the level of early childhood education and care, while in later education there are mostly measures of additional support in education, scholarships and places in student accommodation, but not targeted ones for non-segregated classrooms. The NRSF sets national targets responding to the EU level targets included in the Framework (cut the gap in participation in early childhood education and care by at least half; reduce gap in upper secondary completion by at least one third; work towards eliminating segregation by cutting at least in half the proportion of Roma children attending segregated primary schools)although using country adaptations for the segregation target (covering only the county with largest Roma population) and for the upper secondary education (restriction in years covered by this level – four or five years of education). It defines baselines and target values for all of them. The NRSF uses all outcome indicators provided in the EU portfolio of indicators complemented by number of country-specific indicators. Values are provided only for the	especially for people living in marginalised communities.
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	headline indicators. The NRSF (currently available for 2021-2022) includes also process indicators at the level of measures).	
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	The NRSF includes specific measures such as promoting adult education, including Roma adults in literacy programmes, increasing the employability of Roma by providing them with new competences in demand on the labour market, promoting good practices and information provision to employers, including on Roma youth and women. The NRSF sets national targets responding to the EU level targets included in the Framework (cut employment gap by at least half; cut gap in NEET rate by at least half; cut gender employment gap for Roma by at least half)	The activities included in the action plan in the area of employment are a combination of project-based and mainstream measures. In order to assess their cumulative efficiency and overall impact, a careful monitoring will be needed.
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	The NRSF encourages activities aimed at strengthening the health of Roma people with special emphasis on women's reproductive health, the achievement of the strategic objective "Healthy, active and quality life", reducing the life expectancy gap between the Roma and the general population and increasing the awareness of the Roma population about gender-based violence health professionals and Roma communities. The NRSF sets a national target responding to the EU level target included in the Framework (cut life expectancy gap by at least half)	The NRSF could include more targeted measures to train health staff on diversity and discriminatory bias.
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND	The NRSF includes measures to improve equal access to social housing by adopting access criteria prioritising social needs, to ensure access to essential services, such as tap water, adequate	There are no specific actions foreseen to address the issue of the legality of Roma housing units. The NRSP and Action Plan could include more specific measures with

ESSENTIAL SERVICES	sanitation and waste collection, to monitor, prevent and combat any spatial segregation, to prevent forced evictions by early warning and mediation, and to prevent and tackle the negative health impact of exposure to pollution and contamination. The NRSF sets national targets responding to the EU level targets included in the Framework (reduce gap in housing deprivation by at least one third; cut gap in overcrowding by at least half; ensure that at least 95 % of Roma have access to tap water)	regards to spatial desegregation, relocation of persons living in segregated settlements to mainstream non-segregated areas, social housing provided for these persons in non-segregated areas. The measures planned in this area do not include an allocated budget, indicative timelines and source of funding.
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MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	The NRSF defines baselines for every indicator.	
TARGETS	The NRSF sets qualitative and quantitative national targets responding to all the EU level targets included in the EU Roma Framework	The Commission welcomes the effort invested in establishing a solid set of targets which aligns with the ambition set by the EU Roma Strategic Framework.
INDICATORS	The NRSF uses all indicators provided in the EU portfolio of indicators (headline and secondary) complemented by number of national indicators. The NRSF includes all indicators disaggregated by sex and age.	

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	All state administration bodies and other public bodies are involved in drafting and monitoring the Action Plan. The ombudsperson's institution play a central role, as well as civil society organisations, especially the national coordination of councils and representatives of the Roma National Minority Alliance. The Commission for the Monitoring of the National Plan for Roma Inclusion is composed of the	

		Deputy Prime Minister, a Roma member of the Parliament, and representatives of state administration bodies, as well as representatives of the Roma national minority and associations.	
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS		The strategy provides for alignment and complementarity with other mainstream strategies in the field of anti-discrimination, promotion of human rights, poverty and social exclusion and gender equality, all based on the relevant EU documents such as EU Anti-Racism Action Plan 2020-2025, EU Gender Equality Strategy 2020-2025, and the European Pillar of Social Rights.	Specific details on how the NRSF is aligned with other relevant national strategies could have been better illustrated.
FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	In its indicative financial plan, the NRSF mentions the uses of EU funding programmes with specific amounts. In various projects, the NRSF foresees the use of ESF+.	
	OTHER SOURCES OF FUNDING	The detailed indicative financial plans provides precise and yearly amounts allocated mainly by the State budget and also loans and other sources.	For a clearer picture of the specific budget allocations and their long-term sustainability, the additional sources of funding and could have been better detailed.

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

In 2020/2021, Croatia started to implement a Roma curriculum in schools. Its aim is to preserve the Roma's language and culture. Roma children can attend 2-5 hours of extra classes per week taught in their native tongue.

CYPRUS

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	Strategy: Cyprus National Roma Strategic Framework 2021-2030
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 1,250; 0.16% of total population
National Roma Contact Point (NRCP)	Social Welfare Services, Deputy Ministry of Social Welfare

NATIONAL ROMA CONTACT POINT	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRCP, the Deputy Ministry of Social Welfare, was established in May 2021 and entered into force in July 2021, with the purpose of strengthening social welfare services and to address the social problems faced by the citizens in Cyprus, including Roma. It provides technical expertise and financial support to local authorities and communities with the aim of setting up the necessary teams of professional social workers for the development of Social Work in the Community.	The NRSF 2030 does not provide sufficient information with regards to the specific mandate of the NRCP to ensure the coordination and monitoring of the NRSF. In this sense, it appears that the NRCP is mainly tasked with strengthening accessibility of social welfare services for all citizens. The NRCP does not seem to be counting on a dedicated team and mandate which would align with the minimum commitments set in the EU Roma Strategic Framework and the 2021 Council Recommendation. Setting up a National Roma Platform could help to improve the coordination of outreach to the Roma population and co-operation with Roma civil society.

HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
The aim of the National Strategy is to create and strengthen a framework in which all bodies will implement measures for the effective protection and promotion of human rights, in compliance with the obligations arising from European and international commitments of the Republic of Cyprus. It includes measures such as the “National Strategy for the protection and promotion of Human Rights” (June 2021) which seeks to combat discrimination and eliminate obstacles that Roma encounter in the enjoyment of human rights, the Code of Conduct against Racism & Guide for Managing and Recording Racist Incidents, or awareness raising for students about Roma culture, language and history, including the Roma Holocaust, through the history curriculum and events for the International Roma Day.	The NRSF refers to an anti-racism policy which takes account of the phenomenon of antigypsyism yet the strategy could potentially provide for a more targeted approach to combat antigypsyism explicitly.

1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF does not contain this horizontal objective. The Ministry of Education, Culture, Sport and Youth is pursuing awareness raising to students about Roma culture, language and history, including about the Roma Holocaust through the history curriculum, as well as through organising activities in Cyprus to celebrate the International Roma Day, and the “Code of Conduct against Racism & Guide for Managing and Recording Racist Incidents”.	Promotion of positive narratives about Roma and Roma role models are not specifically mentioned in the NRSF, although such measures are important for the mainstream society to better understand the challenges that Roma face and to inspire the young Roma.
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF does not contain a specific objective to cover this area. It includes mainstream measures, as part of a project co-funded by the European Social Fund, aiming at the improvement of accessibility, enhancing individualised and holistic /multidisciplinary support to people and families. Support Measures included in ESF+ for minority and vulnerable groups are available for the Roma communities as well.	Due to the mainstream approach of the interventions, the planned measures do not seem to be ambitious enough to tackle the needs of the Roma communities in Cyprus.
3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF’ does not include a specific objective for this area. Participation is referred to as a matter of principle to be promoted generally by the National authorities.	The NRSF does not present a clear course of the consultation processes carried out in drafting the national framework and has no future provisions for strengthening the process. There are no indications of measures to boost the recruitment and representation of Roma in any structures that could lead to them influencing the policy-making with regards to Roma equality, inclusion and participation.

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM	The NRSF main goal is to ensure that all Roma have effective and equal access to education and are able to participate in all forms and stages of education, with the necessary measures in place that	There is no reference to digital skills, except the provision for digital equipment and digital access /connection.

EDUCATION	will promote their personal development. Towards this objective the Ministry of Education, Culture, Sport and Youth (MoECSY) has set two goals and targets: The majority of Roma Children complete compulsory education until the age of fifteen or complete lower Secondary Education Cycle (Gymnasium) or whatever comes first. To reduce the gap in upper secondary education or vocational /technical secondary education. The NRSF plans to introduce a core programme beginning from lower secondary education to address the problem of disengaged students and students at risk of dropping out, including Roma students. The NRSF includes also measures to enable the study of the Greek language classes to Roma and all the vulnerable groups and immigrants.	The NRSF does not envisage measures to re-integrate Roma early leavers into education. No measures are established regarding participation of Roma students at higher education level and the overall higher education attainment for them. Cyprus' tertiary education attainment is one of the highest in the EU and would be an asset to also integrate Roma students to the higher education.
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	The NRSF does not contain a specific objective in this area. There are no targeted Roma measures, but mainstreamed measures aimed at: training and retraining of unemployed and low-paid workers, with particular emphasis on beneficiaries of social benefits, plans for subsidising the recruitment of unemployed, people with disabilities, chronic patients and young people up to 29 years, mechanisms of activation of the beneficiaries of the Guaranteed Minimum Income (GMI) for those who can work.	The NRSF could have aimed to ensure proportionate participation of Roma in mainstream active labour market policy measures, in particular targeted upskilling measures, including training or mentored on-job subsidised job experience. It could strengthen the involvement of non-public /private sector employment providers, including NGOs.

6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	The NRSF does not contain a specific objective in this area. The mainstreamed measures refer to the National Health Scheme (GesY) and the restructuring of the public hospitals into autonomous establishments, a scheme which introduced the institution of a personal physician for everyone. There is a provision that promotes the registration of children with a paediatrician of their choice; personal physician's services are provided free of charge.	Awareness of Roma could be raised in relation with the above-mentioned rights when receiving medical care, and, to guide Roma for the purpose of enrolment in the GESY.
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	The NRSF does not include a specific objective for this area. Cyprus introduced in July 2014 the Guaranteed Minimum Income (GMI) (No. L-109(I)/2014) which provides benefits such as housing, care and emergency needs, and support for disability. The GMI can be provided to people in need, including Roma of Cypriot Citizenship.	The scope and scale of interventions in housing infrastructure is largely insufficient, therefore the package of measures could be scaled-up.

MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	The NRSF does not include baseline values.	National baselines could be defined
TARGETS	The NRSF sets national quantitative or qualitative targets covering issues other than those addressed by the EU level targets in a given objective of the EU Framework.	National targets could be defined more closely towards the Framework's EU level objectives and targets based on a comprehensive needs-assessment.
INDICATORS	The NRSF does not use indicators, neither from the EU portfolio nor national indicators.	Indicators could be defined.

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	The NRSF places the NRCP centrally to enhancing cooperation and involvement of the local authorities. The NRSF envisages setting up a “committee to monitor the implementation of the Strategic Framework”. The TOR of the Committee however is not defined yet, but it envisages participation of non-governmental organisations.	The NRSF does not detail on how the NRCP will cooperate with the local and regional authorities. The NRSF does not include support measures for capacity building of Roma NGOs. The NRSF does not envisage the establishment of a structured form of dialogue with the Roma civil society, an aspect that need to be properly addressed and strengthened.
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS	The measures provided for to reach out to the Roma population are mainstream measures. The Strategy refers to key features of the Social Policy Strategy, 2021-2027; National Strategy for Preventing and addressing School Violence or National Child Guarantee Action Plan – still in development at the time of the submission of the NRSF.	Multiple discrimination and other issues related to discrimination have not been adequately included in the NRSF.
FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	The NRSF contains references to some ESF projects.
	OTHER SOURCES OF FUNDING	

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING
Towards this aim to improve the quality of health care system, the government of Cyprus introduced the National Health Scheme (Gesys) and the restructuring of the public hospitals into autonomous establishments. The pandemic showed the multiple benefits and the usefulness of the scheme which serves people universally and equally including the Cyprus Roma. The scheme introduced the institution of a personal physician for each individual.

CZECHIA

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	Roma Equality, Inclusion and Participation Strategy 2021–2030 (NRSF) Implementation plan 2021-2030
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 200,000; 1.9% of total population National census (2021): 21,691; 0.2%. In line with the EU Roma Framework’s common but differentiated approach, this Member State was invited to make more ambitious commitments to Roma equality, inclusion and participation than other Member States
National Roma Contact Point (NRCP)	Office of the government council for Roma minority affairs (EN) , Inter-ministerial Commission for Roma Community Affairs Rada vlády pro záležitosti romské menšiny (CZ) (NRCP)

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
The NRCP can count on a dedicated team and institutional mandate that ensures political weight, cross-sectoral coordination and mainstreaming of Roma equality and inclusion. It is involved (by EU fund managing authorities) in the coordination of cross-governmental discussions on the distribution of EU funds for Roma, and in systematic monitoring of their use.	Currently, the NRCP consists of a small team, however, in order to further expand its capacity in fulfilling efficiently its full range of coordination, monitoring and reporting roles, more human and financial resources seem to be necessary to achieve the targets set in the NRSF and Implementation plan. The specific objective of “Strengthening key stakeholders responsible for coordination and implementation of the Roma Integration Strategy 2021–2030 on central, regional and local level” is a welcome development in this regard.

HORIZONTAL OBJECTIVES

1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION

1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA

KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes the strategic objective “Reduce the level of antigypsyism” with concrete measures under the specific objectives: monitoring and evaluation of antigypsyism, combatting prejudices and stereotypes in the society and increasing the availability of law enforcement support. The NRSF responds explicitly to the EU Roma Framework’s headline target on discrimination. (cut the proportion of Roma with discrimination	The NRSF acknowledges that the fight against antigypsyism is a long-term goal that requires government's determination, however an effective implementation of this objective would require measures to develop and promote a comprehensive system of support for victims, and punishing of perpetrators.

experience by at least half; decrease the proportion of general population who feel uncomfortable having Roma neighbours by at least a third).	
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes the strategic objective “Emancipation - promoting equality, inclusion and participation” with concrete measures under the specific objectives: increasing the active participation of Roma in decision-making processes at the local, regional and national levels; promoting cultural emancipation of Roma; and reconciling the past injustice committed against Roma during the World War II. It also provides relevant measures in this area under the strategic objective concerning quality inclusive education.	Considering the high level of stereotypical attitudes towards Roma of a significant part of the teaching staff³, targeted measures are needed to counter these pervasive negative perceptions among teachers. Such measures should specifically include reinforced training for teachers on the Roma history, including the Roma Holocaust, culture and language when working with Roma pupils, promotion of positive role models and narratives, more Roma teachers, multicultural activities and campaigns in schools as well as more substantial and adequate portraying of Roma in the school textbooks.
2. EDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF does not include this specific objective but mentions poverty as an issue that goes across all sectoral objectives. The At Risk of Poverty and Social Exclusion (AROPE) indicator is used as a strategic objective indicator for the area of housing. Although this specific objective is not included as such in the NRSF, a target has been established for Roma at risk of income poverty includes which responds to the EU level target included in the EU Roma Framework (cut poverty gap between Roma and general population by at least half)	It would be important to set a target related to child poverty, as included in the EU Roma framework.

³ Public Opinion Research Centre (2017) found that up to 66.7% of teaching staff respondents showed antipathy towards Roma.

3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
The specific objective “Increasing the active participation of Roma in decision-making processes on the local, regional and national levels” includes important measures concerning community work and community organising, putting an emphasis on empowering communities and promoting harmonious inter-ethnic coexistence, as well as Roma participation in advisory and consultative bodies dealing with affairs concerning Roma. Roma Council, Roma NGOs and experts were closely involved in consultations and in the process of the development of the NRSF. The NRSF sets national targets responding to the EU-level targets included all EU-level targets included in the EU Roma Framework. (capacitate and engage at least 90 NGOs in EU wide coordinated Roma civil society monitoring; ensure participation of Roma NGOs as full members in national monitoring committees for all programmes addressing needs of Roma communities; double proportion of Roma who file a report when they experience discrimination; encourage participation of Roma in political life at local, regional, national and EU levels (in Member States with significant Roma population).	The measures concerning Roma women and youth are featured in the NRSF. However, there could be more support provided for the networking of Roma women and youth, establishment and functioning of Roma and pro-Roma women’s and young NGOs or associations. While the targets on national monitoring committees and on reporting discrimination are addressed explicitly, the remaining two EU targets are addressed only at the level of measures.

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM	The NRSF specific objectives are focused on: better participation of Roma children in pre-school education; elimination of discrimination and segregation of Roma in education, institutional	Roma children are still disproportionately represented among children diagnosed with mild mental disability and inadequately placed in the mainstream education programme with decreased learning outputs.⁴ The

⁴ In the 2020/2021 school year 11.93% of Roma students were educated under “adjusted outcomes” educational program compared to 1.66% of all children. See the statistical data provided by the Czech government in its report on the execution

EDUCATION	care and education; improving the quality and increasing the staff of the counselling system in education; increasing the level of education of Roma; ensuring support for the development of professional competences of teachers; and ensuring conditions for the meaningful use of after school time of Roma children, pupils and students, especially in the area of recreational and artistic education, sports and other activities that support meaningful inclusion. The NRSF responds to all headline EU level targets included in the EU Roma Framework. (cut gap in participation in early childhood education and care by at least half; reduce gap in upper secondary completion by at least one third; work towards eliminating segregation by cutting at least in half the proportion of Roma children attending segregated primary schools (in Member States with significant Roma population)	adequate use of modern diagnosis methods and tools is a key to correctly address children's needs and to prevent and eliminate occurrence of any misdiagnosing of Roma children. The measure "Ensure the promotion of coherence between lower and upper secondary education" appears as underdeveloped and does not outline any specific interventions that would help to ensure a successful transition from lower to upper secondary education for Roma pupils. Another measure "Ensure support in the education of Roma secondary school pupils", does not envisage any early intervention concerning those at risk of leaving secondary education. Furthermore, it is unclear whether this support would be continued beyond the indicated implementation period of 2023. The methodological guidance and improved monitoring arrangements planned are likely to be insufficient to achieve progress due to a lack of societal consensus on the benefits of inclusive education. It is therefore important to increase commitment at local level for inclusive education, for instance by creating incentives. Some of the targets focused on quality education aiming for significant reduction of the number of Roma pupils in the special education programmes, are not quantified.
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of the judgment D.H. and Others v. the Czech Republic of 30 September 2021, p. 7, available at: https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=0900001680a41672.

5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	The NRSF specific objectives are focused on ensuring the monitoring of discrimination, in access to employment and at work, on grounds of Roma origin; ensuring support for socially excluded people, including Roma, in accessing the labour market; ensuring support for self-employed and entrepreneurial Roma; ensuring the development of entrepreneurship of Roma; ensuring support in a comprehensive manner to address Roma unemployment. The NRSF responds to the EU-level target included in the EU Roma Framework's targets on NEETS and employment gap (cut employment gap by at least half; cut gap in NEET rate by at least half Although the NRSF does not respond to the EU Roma Framework's target on the gender employment gap, it mentions some measures targeting Roma women.	With regard to the number of Roma NEETs (not in employment, education or training), there is need for the ALMPs (active labour market policies) to be tuned to address their needs through individual counselling and advice. In the context of access to the labour market, PES (public employment services) need to be reformed in order to provide practical support to Roma job seekers, when transiting from unemployment to the labour market, by learning new skills or upskilling.
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	The NRCP specific objectives are focused on redressing for unlawful sterilisation of women, improving access to and participation in health care among Roma, ensuring representative quantifiable data on health and health care among Roma in all regions, ensuring the availability of health services in time, place, capacity and price, specifically for socially excluded populations, including Roma; ensuring the availability of drug services for Roma substance users; ensuring that domestic and gender-based violence in Roma families and among Roma LGBTIQ+ people is addressed.	Reduction of health inequalities (in all dimensions) among Roma also requires systemic measures to ensure equal access to mainstream health services, e.g. investment in Roma health professionals (nurses, general practitioners, etc.) and measures to address digital exclusion of Roma people in their access to healthcare services.

	The NRSF sets a national target responding to the EU level target included in the Framework (cut life expectancy gap by at least half) The NRSF uses a strategic indicator on life expectancy at birth.	
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	The NRSF specific objectives are focused on reducing discrimination and segregation in access to housing; increasing the quality and availability of housing for socially excluded population including (a) adoption of a law on affordable housing that will include regulation of social housing and right to decent housing (b) existence of subsidy programmes /calls to support affordable housing and social housing, including Roma; targeted monitoring /monitoring of the housing market situation and support for rehousing tools. The NRSF explicitly responds to the EU-level target included in the Framework's on housing deprivation. The EU-level target included in the Framework on overcrowding is adjusted to the average number of rooms per person in the Roma households and also responds to the EU-level target.	On top of the proposed measures, it is important to sensitise the social housing system to take into consideration multiple disadvantages people may face. In addition, NRSF could provide integrated housing programs for marginalised Roma through measures such as combining microcredit for housing construction and maintenance with financial literacy and savings programs, training in the areas of construction and activation measures.

MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	The NRSF sets national baselines.	
TARGETS	The NRSF provides national specific objectives and targets including comprehensive analysis. Most of these targets respond to the EU level target included in the Framework.	Czechia is encouraged to set more ambitious 2030 national targets corresponding to the EU-level targets included in the EU Roma Framework, in the areas of child poverty; cutting the gap in gender unemployment; and increasing access to tap water, as it is a country with a significant Roma population and complex challenges.
INDICATORS	The NRSF rather uses national indicators. It also uses, in a limited manner, the outcome indicators from the EU portfolio of indicators.	Sources of data for the listed indicators are not clear in the strategy. Although it mentions sources for baseline values, it is not clear if the same data collections would be in place also in the future.

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	Roma and pro-Roma NGOs working under the umbrella organisation Roma-net and the Government Council for issues concerning Roma were meaningfully consulted in the development of the national Roma strategic framework.	While co-operation with the Roma civil society in the NRSF development was successful, the involvement of regional offices (political representatives and administration of the regions) and local municipalities is also very important as it represents the basic precondition for the functional implementation of the NRSF. In addition, the city /district strategies shall be aligned with the NRSF.
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS	The NRSF lists a number of national strategies and plans relevant for the NRSF: Social Inclusion Strategy 2021–2030, Long-term Plan for Education Development of the Education System of the Czech Republic 2019–2023, Strategy for the Education Policy of the Czech Republic up to 2030+ and many others. The NRSF refers to the European Social Charter. The NRSF provides	

		intersectional approach and covers the issues of Roma women, children, youth and LGBTIQ.	
FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	The NRSF states that the support for Roma inclusion will be directed primarily from three programmes within the 2021–2027 programming period: Employment Plus Programme, Johannes Amos Comenius Programme (both financed from ESF+) and Integrated Regional Programme (financed by the ERDF).	Recovery and Resilience Plan investments supporting Roma need to be more clearly identified in the national strategic framework. The NRSF should explain more clearly how the various funding streams complement each other.
	OTHER SOURCES OF FUNDING	The NRSF will be also funded by national budget and EEA/Norway FM.	

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

The NRCP has an institutional mandate, coordination role and can co-operate with the line ministries for implementation of the NRSF. Strengthening key stakeholders responsible for coordination and implementation of NRSF on central, regional and local level” is a promising practice in this regard.

Romodrom’s Housing First for the Moravian-Silesian Region project addresses homelessness and housing deprivation of people of Roma origin who are socially excluded or at risk of social exclusion. The project aims to help people who need the most support, e.g. people in severe housing need. The target group includes households (individuals, couples, and families) that do not have housing or are at immediate risk of losing their homes. The project includes several activities, such as finding apartments, contacting private homeowners, establishing cooperation with owners, addressing the target group, finding and selecting clients, establishing a confidential relationship with clients, moving assistance and complex support after moving. The project applies the principles of the Housing First model and connects the non-profit sector and the private sector.

DENMARK

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	Set of policy measures relevant for Roma. Denmark’s strategy on Roma equality, inclusion and participation (NRSF).
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 5,500; 0.1% of total population National census: not available
National Roma Contact Point (NRCP)	Ministry for Children, Gender Equality, Integration and Social Affairs (NRCP)

NATIONAL ROMA CONTACT POINT	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRCP is given mandate, resources and staff to ensure ongoing coordination and monitoring and presenting a regular progress report.	The NRSF could be more explicit regarding the NRCP mandate and resources, indicating whether it is strong and sufficient enough to ensure proper coordination with line ministries, regional and local authorities, as well as with the Roma and pro-Roma civil society.

HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes information on the mainstream legislation and policies concerning Gender Equality Act, Act on Ethnic Equal Treatment, social inclusion and hate crime.	The NRSF does not include specific measures to tackle antigypsyism.
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes information that one of the school curriculum topics is ‘culture, aesthetics and community’ and that educational staff must actively promote culture and support all children, regardless of their background, skills and previous experience of culture. Pupils from EU/EEA countries can also be offered mother-tongue education to develop not only the skills they need to communicate in their mother tongue, but also their linguistic awareness, based on the fact that they use two languages in everyday life.	The NRSF could include specific information about promoting Roma history, culture, recognition and reconciliation. Measures promoting positive narratives about Roma and Roma role models could be developed
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes information on the mainstream reforms, measures and other initiatives relevant for Roma, e.g. Children First, Action plan to combat homelessness by making greater use of the Housing First approach, Day Care Act.	While the NRSF does not cover this specific objective, it could have set out how the mainstream measures contribute to reducing poverty and social exclusion of Roma.

3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes measures to promote the participation and institutional capacity by means of several actors, most notably the National Roma Contact Point, the Council for Ethnic Minorities, and the Council for the Socially Vulnerable and other civil society organisations.	Denmark has a long tradition of a strong civil society working for and with vulnerable and socially disadvantaged groups, however, the NRSF does not include any information on the existence or participation of Roma civil society organisations. Hence, the NRSF could include specific measures to promote capacity-building and facilitate active participation of Roma civil society in all stages of policy-making and ensure its involvement in the implementation and monitoring of the NRSF. A National Roma Platform could be established to bring together the NRCP, line ministries, equality bodies and Roma civil society.

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	According to the NRSF, Roma, like other citizens residing legally in Denmark, are covered by legislation and policy initiatives generally aimed at ensuring that the entire population has access to day-care and inclusive education.	The NRSF could have included more specifically measures proposed by the Council Recommendation in this sectoral area, according to Denmark's national context. PISA 2018 results showed a significant performance gap for young people with migrant background. This indicates that the quality of education both at early childhood education and especially primary school level could be improved warranting the need for more targeted support measures.
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	According to the NRSF, the mainstream employment strategy focuses on active employment policies with the aim of helping people to achieve sustainable integration into the labour market. The NRSF includes several measures targeting vulnerable groups to support their access to the labour market.	The NRSF could have included more specifically measures proposed by the Council Recommendation in this sectoral area.

6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	According to the NRSF, the Health Act and Social Services Act states that persons with resident statute in Denmark have access to all public, regardless of ethnic or national background.	The NRSF could have included more specifically measures proposed by the Council Recommendation in this sectoral area.
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	According to the NRSF, everyone residing legally in Denmark, regardless of income, social, religious, ethnic or national background, has the opportunity to apply for good quality housing in the non-profit social housing sector, including Roma.	The NRSF could have included more specifically measures proposed by the Council Recommendation in this sectoral area. The NRSF does not include reference to EU mobile Roma and whether they are entitled and granted access to services.

MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE		Baselines could be included to allow measuring progress.
TARGETS		In line with the minimum commitment, the NRSF could have benefited from establishing national targets towards the EU objectives and targets based on a comprehensive needs-assessment;
INDICATORS		Indicators could be defined closely in line with EU level objectives and targets and the EU portfolio of indicators.

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCF, National Roma Platform, national, regional and local CSOs, equality bodies)	According to the NRSF, the government involves civil society in national integration efforts and supports a number of civil society organisations working to integrate people with a foreign background. It also promotes inter-authority cooperation, with central and local agencies coordinating on data collection and fund allocation.	The NRSF could include information on the consultation with the Roma representatives.
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION	The NRSF consists of a set of mainstream policy initiatives referred in all sections above. It underlines that Denmark has a comprehensive approach of non-discrimination in all policy and	Although the adopted national framework is titled as “Strategy on Roma equality, inclusion and participation”, it mostly refers to mainstream policies and initiatives concerning legal residents and

WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS		sectoral areas.	persons of foreign background, lacking substantiation on specific information and measures about the Roma (including EU mobile Roma).
FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)		
	OTHER SOURCES OF FUNDING		

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

In Denmark, all municipalities must establish a coherent, coordinated youth strategy across the employment, education and social sectors for young people under 25 who have not completed upper secondary education. This could ensure a bottom-up and tailor-made approach on municipality level and might be a promising practice in this regard.

ESTONIA

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	Cohesive Estonia Strategy: Integration, Inclusion Adaptation 2022-2025 Set of policy measures relevant for Roma
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 1,050; 0.08% of total population Population register (2021): 673; 0.06%
National Roma Contact Point (NRCP)	Ministry of Culture (NRCP)

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
The NRCP is given mandate, resources and staff to ensure ongoing coordination and monitoring and presenting a regular progress report.	The NRSF could be more explicit regarding the NRCP mandate and resources, indicating whether it is strong and sufficient enough to ensure proper coordination with line ministries, regional and local authorities, as well as with the Roma and pro-Roma civil society.

HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
The policy documents submitted include in the Integration plan the indicator “Proportion of people with an open attitude based on the composite tolerance index”.	In general, the documents mention that Roma are much more likely to encounter intolerance compared to the other nationalities. However, they do not include any measures concerning antigypsyism and discrimination. There is no substantiation in the Integration plan about the relevance of the listed indicator.
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The mainstream Cultural Development Plan 2030 refers to the importance of introduction of Roma culture and history to the general public.	There is no specific information or measures to promote Roma history, culture, recognition and reconciliation.
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The mainstream Welfare Development Plan is listed as the policy document to address poverty.	While the submitted documents do not cover this specific objective, it could have set out how the mainstream measures contribute to reducing poverty and social exclusion of Roma.
3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
To promote Roma integration and coordinate information the Advisory Council for Roma Integration (Roma Platform, 3 people) has been established as part of the Ministry of Culture. Its role is to analyse the integration issues, make policy recommendations to relevant institutions, and co-operate towards this goal. The Ministry of Culture carries out projects aimed at Roma empowerment, as funded by the EU.	While acknowledging the issue of the very low level of participation among the Roma NGOs, as well as a lack of trust in state institution, the submitted documents do not provide sufficient indications about how the empowerment of Roma NGOs could be further strengthened to ensure their active participation in all stages of policy-making and implementation, including monitoring and reporting.

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	Education Development Plan 2021–2035 aims to develop an Estonian-language education and to ensure language proficiency that allows for a successful continuation of studies. The Integration plan refers to the indicator “Percentage of Roma 15 and older who have a secondary, vocational or higher education” and an associated baseline and target. The NRSF responds to one EU-level target included in the EU Roma Framework (reduce gap in upper secondary completion by at least one third)	The documents acknowledge that Roma lag far behind in education. However, there are no specific measures mentioned to support their integration into early childhood education and care as well as primary education, including preventing early school leaving.
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	The Estonian labour policies are focused on the improvement of the availability of needs oriented labour market; provision of services for people from different linguistic and cultural backgrounds; supporting the recruitment of employees with other native languages in state and local government agencies; support employment diversity policies. The Integration plan refers to the indicator “Employment rate of Roma (15-74-year-old)” and associated baseline and target. The NRSF responds to one EU-level target included in the EU Roma Framework (cut employment gap by at least half)	The policy documents acknowledge that the Roma face more challenges in accessing labour market compared to general population. However, there are no specific measures associated with the indicator “Employment rate of Roma (15-74-year-old)”.
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES		The submitted policy documents do not include this sectoral objective. Furthermore, there are no measures included from those proposed by the Council Recommendation in this sectoral area.
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE		The submitted policy documents do not include this sectoral objective. Furthermore, there are no measures

DESEGREGATED HOUSING AND ESSENTIAL SERVICES		included from those proposed by the Council Recommendation in this sectoral area.
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MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	The relevant baselines for employment rate and education of Roma are based on the national data from Ministry of Culture, 2019.	There could be a baseline for all objectives of the EU Roma strategic framework.
TARGETS	The NRSF sets one national target responding to the EU level target included in the EU Framework for education (reduce gap in upper secondary completion by at least one third), and for employment (cut employment gap by at least half)	Targets could be defined more closely in line with the EU Framework's objectives and targets for all objectives.
INDICATORS	Employment rate of Roma (15-74-year-olds); Percentage of Roma 15 and older who have a secondary, vocational or higher education.	Indicators could be defined closely in line with EU Framework's objectives and targets and the EU portfolio of indicators.

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	According to the Cohesive Estonian Strategy, all policies are consulted with regional and local stakeholders. The Advisory Council for Roma Integration (Roma Platform) has been established (3 people) as part of the Ministry of Culture.	The Roma civil society should be strengthened to ensure its meaningful participation in all relevant processes.
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS	Some mainstream policies are listed in the submitted documents, such as the Education Development Plan, the Cultural Development Plan, and the Youth Field Development Plan.	Although the size of the Roma population in Estonia is small, they face significant inequalities that could be tackled by more targeted measures across all horizontal and sectoral EU objectives.
FUNDING CONNECTION WITH EU PROGRAMMES (instruments)	ESF+ will be used for the measure related to integration and Estonian-language learning. In addition, ESF+ offers considerable support for active labour market measures, activation	

N G		for NEET youth and other social inclusion measures.	
	OTHER SOURCES OF FUNDING		The policy documents could include information on the other sources of funding relevant to Roma.

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

Since 2015, the Ministry of Culture, with the support of the European Commission, implements the Roma Integration Support Project (ESTROM), which aims to promote cooperation and dialogue between integration stakeholders, Roma, local governments and state institutions.

FINLAND

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	Strategy: Finland's National Roma Policy (ROMPO) 2018-2022 (01-01-2018)
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 11,000; 0.21% of total population
National Roma Contact Point (NRCP)	Ministry of Social Affairs and Health

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
The NRCP consists of one full-time staff handling Roma issues within the Ministry of Social Affairs and Health. It has a full mandate to coordinate with ministries and other actors and is in charge of monitoring implementation of the NRSF and coordinating with different authorities on the implementation of measures. The NRCP organises frequent meetings of the Advisory Board on Romani Affairs, bringing together Roma civil society and public authorities, and it is in regular contact with Roma civil society representatives and local and regional authorities.	As the NRCP is staffed by just one person, particular attention should be given to providing guidance and training in situations of staff mobility, in order to ensure the best possible continuity of its work.

HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
Fighting discrimination and multiple discrimination are taken into account in the NRSF as horizontal priorities. Measures include monitoring of discrimination by the Police University College and National Police Board, training by the Ministry of Justice, to prevent ethnic profiling, as part of the education of police officers and security personnel, awareness-raising actions aimed at different professional groups, anti-racism campaigns, as well as commemoration and celebration events on occasions such as International Roma Day, Roma Holocaust Memorial Day, International Holocaust Remembrance Day, and Finnish Independence Day.	The upcoming NRSF should include a dedicated objective on fighting and preventing antigypsyism and discrimination. Baselines and targets could be defined closely in line with the EU Framework's objectives and targets. While the current NRSF defines a set of indicators for equality and discrimination, there is no data included for them.
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes actions to promote the preservation and development of the Romani language, such as drawing up a national action programme for the revitalisation of the Finnish Romani language, strengthening Romani studies at university level, producing teaching materials, providing continuing education for Romani language teachers, strengthening online teaching to ensure outreach to schools without a Romani language teacher, and increasing language advocacy work. With regard to culture, measures include the creation of a national programme for the promotion of Roma art and culture and the set-up of an expert group to prepare the creation of a Roma art and culture centre. The NRSF also aims to ensure nation-wide coverage of Roma children's mobile cultural services and includes measures to support research and archiving of works and artefacts relevant to Roma history and culture. Measures specifically targeting the local level include Roma music and arts camps and courses, as well as initiatives to document local Roma history.	The incoming NRSF could put additional focus on promoting Roma role-models.

2. REDUCE POVERTY AND SOCIAL EXCLUSION

KEY FEATURES	AREAS FOR IMPROVEMENT
Under the ongoing NRSF, recommendations to promote social inclusion and reduce the risk of marginalisation have been formulated based on studies focusing on the sectoral areas of education, employment and housing.	While poverty is mentioned in the ongoing NRSF as an issue affecting EU mobile Roma, no specific measures are defined. A dedicated budget should be earmarked to implement measures reducing poverty and promoting social inclusion. The upcoming NRSF could formulate baselines, targets and indicators closely in line with the EU Framework's objectives and targets.

3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST

KEY FEATURES	AREAS FOR IMPROVEMENT
Equal participation of Roma people in Finnish society is promoted through relevant ministries as well as by the National Advisory Board on Romani Affairs, which serves as a platform for dialogue and cooperation between Roma civil society and public authorities. Additional bodies promoting participation include four regional advisory boards on Roma affairs, 23 local Roma working groups, as well as a church advisory board on Roma issues. The NRSF includes indicators on participation that are linked to EU-level targets included in the EU Roma Framework (capacitate and engage at least 90 NGOs in EU wide coordinated Roma civil society monitoring; ensure participation of Roma NGOs as full members in national monitoring committees for all programmes addressing needs of Roma communities).	Further focus could be given to building capacity of Roma civil society organisations, raising awareness about human rights, promoting employment of Roma in public and private institutions, and actively involving Roma women and youth in consultations, policy and decision-making processes. While the ongoing NRSF includes indicators on empowerment, it does not define baselines, and monitoring was not implemented as planned.

SECTORAL OBJECTIVES

	KEY FEATURES	AREAS FOR IMPROVEMENT
1. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	The NRSF includes a broad range of measures concerning early childhood education and care, as well as pre-primary education, basic education, general upper secondary education, vocational education and training, higher education, and adult education. Measures include providing information	Baselines and targets could be defined more closely in line with the EU Roma Framework's objectives and targets. Indicators in the area of education do not include data. Drawing on the lessons learnt from the still ongoing NRSF, a stronger focus

	about early childhood education and care to parents of Roma children not attending ECEC or attending irregularly, measures to increase completion of basic education and facilitate transition to secondary and higher education for Roma students, reviewing the contents of educational materials concerning Roma and providing textbook publishers with guidance. Measures aimed at educational staff include training for teachers and guidance counsellors and providing general information about Roma. The NRSF also foresees awareness-raising measures about secondary, higher and adult education opportunities among Roma students and parents. There are no situations of educational segregation in Finland, according to the NRCP.	could be given to ensuring appropriate monitoring.
2. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	The NRSF sets out a wide range of targeted measures to promote access to employment for Roma. These include support to entrepreneurship among Roma, developing cooperation and networking between Roma CSOs and employers, promoting non-discriminating recruitment practices, provision of coaching, building the capacity of CSOs as employment service facilitators, and strengthening participation of Roma in vocational education in different fields. Specific measures address the needs of EU mobile citizens and Roma migrants.	Baselines and targets could be defined more closely in line with the EU Roma Framework's objectives and targets. Indicators in the area of employment do not include data. A stronger focus could be given to ensuring appropriate monitoring.
3. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	To gather knowledge about Roma as users of health and social services, a pilot project preparing the establishment of a health and social services centre of excellence focusing on Roma issues was launched in 2018. Additional measures include introducing actions targeting Roma in national, regional and local health	Following the reform of health and social services in Finland, coordination and monitoring of access to healthcare for Roma people at county level should be ensured, with particular attention to access to primary care as well as health promotion activities. Baselines and targets could be

	promotion plans, promoting Roma inclusion in leisure services, taking into account the needs of Roma children, youth, elderly and families in the reform of mainstream support services, continuing support measures for Roma against domestic violence, developing support for Roma suffering from substance abuse or mental health issues as well as for Roma inmates, and providing assistance and low-threshold services to EU-mobile Roma.	defined more closely in line with the EU Roma Framework's objectives and targets.
4. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	Measures include implementing proposals made in the 2012 and 2018 Roma housing reports, providing information and advice to municipalities and housing authorities in order to ensure non-discriminatory and equal access to housing, and ensuring crisis and emergency accommodation for homeless Roma and EU-mobile Roma.	Baselines and targets could be defined more closely in line with the EU Roma Framework's objectives and targets.

MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	The NRSF does not define baselines.	In the upcoming NRSF, national baselines could be defined towards the EU Roma Framework's objectives and targets.
TARGETS	The NRSF sets national targets quantitative or qualitative targets covering issues other than those addressed by the EU level targets in a given objective of the EU Framework, except for the participation objectives where targets responding to the EU level targets are set.	In line with the minimum commitments, national targets could be defined towards the EU Roma Framework's objectives and targets based on a comprehensive needs assessment for all objectives.
INDICATORS	The NRSF defines indicators in several areas; however, they do not include data.	Indicators could be defined more closely in line with the EU portfolio of indicators.

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	The National Advisory Board on Romani Affairs, which serves as a cooperation and expert body bringing together public authorities and Roma civil society, meets 5-6 times per year. It contributes to the design, implementation and follow-up of Roma equality and inclusion policies. Roma civil society has participated in workshops to develop the upcoming NRSF. The NRSF puts a strong emphasis on involving the local level via regional advisory Roma boards, through the establishment of municipal Roma working groups, and via specific Roma programmes for each county. Local authorities are also participating in the National Advisory Board for Romani Affairs. The equality bodies cooperate with the NRCP to pursue cases of discrimination and complaints filed by Roma.	
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS	The NRSF is connected to relevant mainstream sectoral policies. It takes into account specific needs of different age groups, Roma women, children and youth, EU-mobile Roma and homeless Roma. Multiple discrimination and other issues related to discrimination are addressed through training and awareness raising activities.	Further focus could be given to identifying and tackling possible barriers depriving Roma from effective equal access to mainstream policies and services.

FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	The NRSF refers to several actions and projects funded by EU funds (in particular ESF), but does not provide details about amounts. The Finnish 2021-2027 multi-fund programme (ESF+, ERDF, JTF) aims to support Roma inclusion in a culturally sensitive way and to support implementation of the EU Roma Strategic Framework.	It could be considered to increase staff and resources of the NRCP in order to allow associating it more closely to the programming, implementation and monitoring of relevant EU funding programmes.
	OTHER SOURCES OF FUNDING	The NRCP has a dedicated budget for preparing the new NRSF. Implementation of measures is funded from different national programmes and by different stakeholders.	It could be clarified which share of the national programmes referred to in the NRSF will benefit Roma equality and inclusion.

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

Including a Roma dimension in mainstream national holidays – such as highlighting the contribution of Roma and commemorating the Roma who have died in wars on Finnish Independence Day – can be expected to raise awareness about Roma history in majority society.

Measures to promote the Romani language as well as Roma art and culture – such as the two national action programmes for the revitalisation of the Finnish Romani language and for the promotion of Roma arts and culture, as well as initiatives aiming for comprehensive coverage of language teaching and cultural services, including through online and digital solutions – appear promising.

In the area of education, the National Advisory Board for Romani Affairs reviews the contents of educational materials concerning Roma and provides textbook publishers with guidance and development proposals regarding these contents. Outreach to Roma families to raise awareness about early childhood education and care can also be highlighted.

FRANCE	
APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	2020–2030 French Strategy in response to the recommendation by the Council of the European Union of 12 March 2021 for Roma equality, inclusion and participation.
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 400,000 Roma; 0.62% of total population. The NRSF gives estimates of 350,000 to 500,000 <i>gens du voyage</i> (corresponding to 0.52% to 0.74% of total population) and 13,000 EU mobile Roma (“people originating from Central and Eastern Europe, mainly from Romania and Bulgaria, who are often considered or consider themselves to be Roma”, corresponding to 0.02% of total population).
National Roma Contact Point (NRCP)	Délégation Interministérielle à l'Hébergement et à l'Accès au Logement (DIHAL)

NATIONAL ROMA CONTACT POINT	
KEY FEATURES	AREAS FOR IMPROVEMENT
As national administrative body dealing with slum clearance and acting as secretariat for the national Travellers’ Commission, the NRCP has a clearly defined mandate, resources that include an operating budget of 150,000 EUR and an envelope for slum clearance of 8 million EUR, as well as dedicated staff. The DIHAL as a whole has a staff of 61 persons, of which ca. 15 work on slum clearance and/or policies related to <i>gens du voyage</i>, to ensure coordination with line ministries and authorities, monitor the implementation of the NRSF, and facilitate dialogue with and engagement of Roma civil society through relevant consultative commissions. The NRCP is consulted and involved adequately by other state bodies on issues relevant to Roma equality and inclusion and participates in inter-ministerial discussions on the use of EU funds.	The NRCP does not participate in the programming and implementation of EU funding programmes, as this process is carried out at regional level. The NRCP does not have the function of ensuring that mainstream public policies and universal services reach Roma effectively, as responsibilities in this field are scattered among different actors and governance levels, and effective equal access of Roma people to public policies and universal services can vary depending on the territories and local context.

HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
As the first official French document referring explicitly to antigypsyism, the NRSF defines the fight against discrimination and antigypsyism as one of its strategic objectives. The established measures are of relevance and focus on acknowledging and raising awareness about antigypsyism, mobilising legal and penal tools to fight discrimination, training for police officers, judges, teachers and administrative personnel, tackling hate crime, strengthening access to justice and victim support, monitoring and tackling hate-speech and discrimination against Roma and <i>gens du voyage</i>, and awareness raising and prevention actions aimed at students.	It could be further clarified to what extent measures equipping certain schools specifically to support Roma children might lead to an over-concentration of Roma children at these schools and how a possible risk of segregation is mitigated. Hate speech (including online) against Roma people could have been more structurally addressed.
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes pedagogical measures in schools and valorisation of positive role models in the broader context of raising awareness about and combating racism. Further ongoing measures focus on strengthening partnerships in the area of culture, such as awareness raising about <i>gens du voyage</i> and Roma culture, recognising <i>gens du voyage</i> identity, culture and memory, encouraging artistic expression, and promoting access to culture and artistic education for <i>gens du voyage</i>, and measures to improve conditions for academic work on witness accounts and oral history, as well as facilitating access to relevant initiatives beyond academia.	Additional focus could be given to promoting access to culture and artistic education and encouraging artistic expression for EU mobile Roma.

2. REDUCE POVERTY AND SOCIAL EXCLUSION

KEY FEATURES	AREAS FOR IMPROVEMENT
In addition to sectoral measures aiming to support access to education, employment, health and housing, the NRSF contains measures to create and improve renting conditions of halting sites for <i>gens du voyage</i> , document existing infrastructures for <i>gens du voyage</i> to identify health and safety problems, involve <i>gens du voyage</i> representatives to the selection process for national funding for the creation of halting sites, and improve access to social rights (e.g. simplifying domiciliation, and supporting civil society actions promoting social inclusion).	Significant barriers to socio-economic inclusion of EU mobile Roma, remain and should be addressed through additional investments. Access to social and affordable housing also remains a challenge for poor households in general.

3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST

KEY FEATURES	AREAS FOR IMPROVEMENT
In this area, the NRSF focuses specifically on EU mobile Roma who are living or have lived in slums and camps. It includes measures such as strengthening partnerships at local and national level, fostering participation at local level via the creation of “social life councils”, promoting positive role models and active citizenship as part of access to school and to employment programmes, and direct engagement and expression of needs via a digital platform.	The NRSF could give more focus to promoting wider active participation and involvement of <i>gens du voyage</i>. Some qualitative process indicators and targets, which still need to be defined, are mentioned; however, they could be more closely aligned with the EU Roma Framework’s targets and the EU portfolio of indicators.

SECTORAL OBJECTIVES

	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	The NRSF includes pedagogical measures in schools and valorisation of positive role models in the broader context of raising awareness about and combating racism. Measures specifically targeting <i>gens du voyage</i> include strengthening cooperation between relevant actors to guarantee access to education, facilitating school enrolment of children by building on existing instruments such as special pedagogical units or	Considering that the age of compulsory school entry was lowered from 6 to 3 years in 2019, the NRSF does not explicitly address how mandatory early-childhood education will be ensured for Roma and <i>gens du voyage</i> families. Outreach of measures to families not living in specific areas, such as halting sites, should be ensured.

	distance learning, and promoting the development of innovative and experimental actions. Measures targeting EU mobile Roma living in slums and camps include guaranteeing access to school for 5,000 children, empowering school directors to enrol Roma children in case of refusal by the mayor, school mediation, school assistance programmes, outreach and support by mobile teams composed of state and regional actors meeting families with children in slums, as well as awareness raising activities.	
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	For EU mobile Roma, relevant measures include an access to work programme combining work and housing, with specific attention given to women, as well as a specific housing and work programme for young people, with features such as language training and internship periods.	Additional measures may be required to address discrimination in accessing the labour market. The NSRF could have given more focus to promoting access to employment for <i>gens du voyage</i>.
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	The NRSF includes measures to survey the health situation of <i>gens du voyage</i> in order to better target interventions, a continuation of the ongoing health mediation programme for <i>gens du voyage</i>, awareness raising about COVID-19 vaccination among EU mobile Roma, as well as measures improving access to health, including via mobile medical teams and health mediation, with a focus on maternal and infant health.	The lack of specific statistics on health service usage and outcomes among <i>gens du voyage</i> may impact the feasibility of a comprehensive assessment. Moreover, output and monitoring indicators for the established measures related to prevention, maternal and infant health still need to be defined.
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	Measures improving access to housing for <i>gens du voyage</i> include supporting the creation of halting sites through better monitoring and coordination, improving conditions for renting of halting sites for families, documentation of existing	Measures included in the NRSF supporting EU mobile Roma may not be fully sufficient to ensure access to affordable and social housing, as the number of available social dwellings is significantly lower than demand, and the rent level remains too high for the poorest households.

	infrastructures to identify safety and public health problems, associating <i>gens du voyage</i> representatives to the funding process for halting sites, and clarifying the legal status of caravans. Regarding people living in slums, the NSRF aims to strengthen the role of the NRCP as central actor, enhance the use of a digital platform as main tool, develop territorial partnership roadmaps for slum clearance with the objective of complete clearance of slums by 2030, and ensure access to “housing first” policies. In the area of essential services, the NRSF includes measures to ensure access to water and improve living conditions (e.g. waste collection, electricity, fire safety, etc.).	The NRSF includes the overall ambitious objective of full slum clearance by 2030, and some (mostly qualitative process) indicators regarding housing and tap water, but these could be linked more closely to EU level targets and objectives.
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MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	The NRSF does not include baselines.	National baselines could be defined towards the EU Roma Framework’s objectives and targets.
TARGETS	The NRSF sets national quantitative or qualitative targets covering issues other than those addressed by the EU level targets in a given objective of the EU Framework.	National targets could be defined more closely in line with the EU Roma Framework’s objectives and targets based on a comprehensive needs assessment.
INDICATORS	At the current stage, the NRSF defines (mainly process) indicators for all areas and foresees the creation of additional indicators.	Indicators could be defined more closely in line with the EU portfolio of indicators.

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national,	The NRCP consults and cooperates with the equality body, line ministries and civil society, in particular via the two national commissions for <i>gens du voyage</i> and	Capacity-building to further strengthen the active participation of civil society actors in policy making could be developed further, including through a national Roma

regional and local CSOs, equality bodies)		for slum clearance. Cooperation with local and regional actors is foreseen for several specific measures, e.g. with regard to access to education. The equality body and civil society have been actively involved in the design of the NRSF.	platform.
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS		The NRSF builds on existing instruments and policies, including the French National Plan Against Racism and Antisemitism, as well as mainstream policies in the areas of education, health and housing. While not including explicit Roma targeting due to the French legal context, it recognises specific challenges such as antigypsyism or the situation of seasonal workers. The NRSF does not explicitly refer to other EU level initiatives. It takes into account needs of different groups such as women and young people in areas such as youth employment, maternal health etc., and it considers specific cases of aging or dependent persons who may not have access to mainstream inclusion measures.	Measures outlined in the NRSF could be connected to EU initiatives, where relevant. More focus could be given to the explicit inclusion of child-sensitive and gender-sensitive measures, as well as measures related to intersectionality and multiple discrimination.
FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	The NRSF refers to mainstream inclusion measures funded under EU programmes and instruments (e.g. ESF+) but doesn't specify what share of the overall budget will benefit Roma and <i>gens du voyage</i> .	Further details on the share of the overall budget dedicated to the measures outlined in the NRSF could be provided, to allow for better correlations and measuring of progress.
	OTHER SOURCES OF FUNDING	The NRSF refers to measures funded from national sources (e.g. the national budget for housing), but it is not clear what share of the overall budget will benefit Roma and <i>gens du voyage</i> .	An overall budget for implementation and monitoring of the NRSF could be indicated.

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

The strategic focus on fighting antigypsyism and discrimination, including through legal and penal tools and improved access to justice, can be highlighted as positive.

Thanks to school mediators supporting families and educational professionals during all stages of schooling and facilitating social inclusion of children, as well as mobile teams ensuring outreach and tailored support to families with children not currently enrolled at school, the number of EU mobile Roma children enrolled at school has already more than doubled from 2019 to 2020/2021.

The ambitious plan of achieving full slum clearance by 2030, supported by targets and a timeline, can be noted as promising. Strengthening the legal status of caravans as places of residence, which follow up on demands from civil society, can be expected to strengthen social inclusion of caravan dwellers and facilitate their access to mainstream social rights.

GERMANY

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	Strategy (2022-2030): Tackling Antigypsyism, Ensuring Participation. National Strategic Framework to Implement the EU Roma Strategic Framework in Germany
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 105,000; 0.13% of total population. The NRSF quotes estimates of between 70,000 and 150,000 for the national Sinti and Roma minority (corresponding to 0.08% to 0.18% of total population) and over 100,000 Roma migrants (corresponding to over 0.12% of total population).
National Roma Contact Point (NRCP)	Federal Ministry for Family Affairs, Senior Citizens, Women and Youth.

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
Formerly located within a department of the Federal Ministry of Interior, the NRCP undergoing reorganisation and is being established as an inter-ministerial coordination office for the implementation of the new NRSF located at the Federal Ministry for Family Affairs, Senior Citizens, Women and Youth. Activities carried out by the new NRCP will include consultation and cooperation with stakeholders, capacity-building to promote active participation of civil society, and setting up a National Roma Platform. The NRCP will coordinate monitoring and reporting and carry out an evaluation and review of the NRSF.	While the reorganisation of the NRCP can be expected to strengthen its role, it is not possible to fully assess its mandate and resources at the current stage. The timing for developing and implementing the monitoring arrangements described in the NRSF should be further specified. A stronger focus could be given on involving the NRCP in ensuring effective and equal access for Roma to mainstream policies and services.

HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF identifies fighting racism and antigypsyism as a key priority. Tackling hate crime and hate speech is specifically addressed. Measures include the set-up of an independent civil society monitoring and reporting office to record incidents below the threshold of criminal liability by 2024, assistance to victims of racism through a phone hotline, promotion of research on racism and antigypsyism, as well as awareness-raising measures about causes, manifestations and impact of antigypsyism. Tackling hate speech and hate crime is specifically addressed in the NRSF. The National Action Plan against Racism, adopted in 2017, addresses areas such as protection against discrimination, prosecution of criminal offences, civic education, promotion of diversity in employment, and combating online racism and hate speech. It is complemented by regional-level action plans and additional measures at regional and local level, such as the creation of an Antigypsyism Prevention Department at Heidelberg University of Education, which will introduce a subject on deconstruction of stereotypes and prejudice into the training of educational staff. The federal “Living Democracy” programme sets out measures at national, regional and local level and includes a focus on tackling antigypsyism in education. A major development in the effort of tackling antigypsyism was the appointment in March 2022 of the Federal Government Commissioner for the Fight against Antigypsyism.	While the NRSF identifies multiple marginalisation of women and girls as a challenge, it doesn’t include targeted measures to address structural, multiple and intersectional discrimination. Local measures such as the training developed at Heidelberg University of Education could be scaled-up to increase their impact. Due in part to the fact that ethnically disaggregated data is not gathered in Germany (also due to legal restrictions), the NRSF does not define baselines, targets or indicators. It is however intended to set up a monitoring framework and define indicators through a participatory process. While the collection of data through a Racism Barometer is foreseen, the NRSF does not specify how the results of this process could feed into the definition of baselines, indicators and targets.

1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
Measures in this area include the development of recommendations for introducing history of Sinti and Roma in schools by the Conference of Ministers of Culture in cooperation with civil society, promotion of historical and cultural education, as well as continued support to the Documentation and Cultural Centre of German Sinti and Roma through federal funding. In addition, an open-air exhibition on the history and fate of Sinti and Roma will be opened in 2022. The Federal Government will also continue to promote Roma arts and history, historical and cultural education, as well as historical research.	A stronger focus could be given to promoting positive narratives about Roma and Roma role models, including in mainstream society, in order to foster a better understanding of the challenges that Roma face and inspire Roma youth.
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
This area is covered mainly via mainstream measures to reduce poverty and foster social inclusion, such as general employment and income support, support for asylum seekers, upskilling and training measures supported under the ESF+, measures targeting intra-EU migrants and homeless people under the Fund for European Aid to the Most Deprived (FEAD), as well as regional level action plans. To ensure effective and equal access for Roma to mainstream measures, awareness-raising actions for relevant employees are conducted, primarily through regional initiatives (e.g. training in prejudice - and discrimination-sensitive action in Lower Saxony).	Targeted measures in this area are mostly local or regional initiatives, relatively limited in scope, and could be scaled-up further. More focus could be given to systematically ensuring effective equal access of Roma to mainstream policies measures. Most of the more specific measures going beyond general social protection schemes concern primarily migrants, leaving out non-migrant population that may still encounter challenges in accessing rights and services.
3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes measures to support capacity-building and promote active participation of civil society, as well as the continuation of established dialogue structures, such as the Advisory Committee for Matters Relating to German Sinti and Roma, dialogue processes with the Government Commissioner for Migration, and the Integration Summit. At regional level, interstate treaties regulating financial support and promoting active Roma	While, on the whole, measures in this area are quite comprehensive, additional focus could be given to supporting participation of Roma women and young Roma in decision-making processes, as well as to promoting employment of Roma in public and private institutions.

participation, as well as advisory councils and integration councils are in place in several regions (Länder).

Further measures support national minorities' efforts to be represented in the media authorities' broadcasting advisory boards to safeguard minority interests and combat antigypsyism in the media, as well as involving civil society in the development of monitoring instruments through the Federal Anti-Discrimination Agency.

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	With educational policy falling under the competence of the regions, the NRSF underlines the right of access for all, including Roma, to all mainstream educational measures at federal, state and local level, with a particular emphasis on early childhood education and care, transition from school to work, and gaining professional qualifications.	
	Measures to support pupils with special educational needs will be further developed and could also benefit Roma students in need of such support.	The NRSF builds on mainstream national education programmes and policies. Gaps could arise due to differences in application between regions. Explicit targeting is difficult because ethnically disaggregated data is not collected.
	Local and regional initiatives include the creation of an Antigypsyism Prevention Department at the Heidelberg University of Education, aiming to train educational staff in the deconstruction of stereotypes and prejudice, as well as the "Schaworalle" project in Hesse, which facilitates access to mainstream education for Roma children not currently enrolled at school.	While several general monitoring tools for the integration of people with a migrant background are referred to, it is unclear to what extent Roma will be covered as a separate category of analysis.
	Further measures include the introduction of intercultural diversity in educational curricula and teacher training in diversity literacy.	

5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	In this area, the NRSF focuses on mainstream measures for employment promotion and unemployment benefits, such as supporting professional mobility, skills development, improving the job situation of women, and vocational education and training. In addition, the NRSF includes measures targeting people with a migrant background (including non-German Roma). These include improving access to the labour market for Western Balkans nationals, as well as language and IT training, support in finding childcare, and support for vocational training for migrants. A project in Hesse facilitates access to vocational training, school qualification and jobs for Roma youth and young adults.	Targeted measures of limited scope, such as the project implemented in Hesse, could be scaled-up further and replicated to maximise their impact. It is not always clear how effective equal access for Roma to mainstream measures will be ensured.
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	With regard to healthcare and social services, the NRSF focuses on mainstream measures aiming to ensure equal healthcare access for all population groups, as well as on measures facilitating access to insurance cover for EU citizens. Specific support to migrants in accessing healthcare is provided by local and regional authorities and healthcare providers. The German Central Council of Sinti and Roma provides advice on Roma concerns regarding access to health care. Several regions have established advisory centres specifically for Sinti and Roma with regional and ESF funding.	Measures at regional level could be replicated and scaled-up. A stronger focus should be given to systematically tackling the challenge of under-insurance within the Roma community, in order to facilitate effective uptake of insurance rights, which is identified as a bottleneck in the NRSF. While measures to address this challenge may need to be implemented locally, a stronger role of the federal level in assessing needs, fostering exchange of good practices, and providing coordination, guidance and support could be beneficial. The NRSF does not provide data on gaps and lags in the effective uptake of healthcare coverage.

7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	In this area, the NRSF focuses on mainstream measures promoting access to social housing for low-income households, households with children, single parents, people with disabilities and other people in need, as well as housing benefit allowances. Urban development programmes aim to improve the inclusion of disadvantaged groups. Measures targeting Roma are implemented in some cities, such as Dortmund, which includes a Roma-specific approach in its “Access to Housing” strategy.	Measures at local level, such as the housing strategy of Dortmund, could be replicated and scaled-up. More attention could be paid to ensuring effective equal access of Roma to mainstream measures.
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MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	The NRSF does not define baselines.	National baselines could be defined.
TARGETS	The NRSF does not include targets.	In line with the minimum commitments, national targets could be defined towards EU level objectives and targets based on a comprehensive needs assessment.
INDICATORS	The NRSF does not refer to the EU portfolio of indicators nor defines national indicators, mainly due to the unavailability of ethnically disaggregated data for Germany. To allow the creation of national indicators and targets, the NRSF foresees a participatory process, which aims to set up a framework for monitoring, evaluation and gathering of relevant information together with Roma CSOs. In addition, the NRSF relies on monitoring of the integration of migrants, research on antigypsyism, and a Racism Barometer.	It is unclear to what extent Roma will be covered as a distinct category by the integration monitoring and the Racism Barometer. The NRSF envisages the development of an indicator framework in cooperation with civil society, but does not define indicators.

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	Mechanisms for consultation and cooperation, including the set-up of a National Roma Platform, are well developed. The equality body commissions research projects on antigypsyism, supports the development of monitoring structures, and participates in coordinating the implementation of the NRSF. The role of Roma civil society is strengthened through provision of support for civil society monitoring of antigypsyism, the creation of an independent reporting office, and active involvement in developing options for data collection.	Care should be taken not to restrict the role of the planned National Roma Platform to information sharing only but to ensure the active engagement and participation of Roma civil society, including women and youth, in a national consultation process, as well as their involvement throughout the implementation of the NRSF, its monitoring and reporting.
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS	At national level, the NRSF refers primarily to mainstream measures with regard to social inclusion and sectoral policies. It refers to relevant EU policies and initiatives, such as the European Pillar of Social Rights and the Youth in Action programme. The NRSF addresses needs of different groups and notably includes measures aimed at Roma youth, women, mobile citizens, and migrants.	The NRSF does not always sufficiently specify how effective access for Roma to mainstream measures will be ensured and does not mention explicit Roma targeting within the mainstream measures.
F U N D I N G	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	The NRSF indicates that relevant EU funding programmes and instruments, such as ESF+ and FEAD, will be used to support implementation, but it does not specify amounts.
		More attention could be given to ensuring effective equal access for marginalised Roma people to social inclusion, health and employment promotion measures supported under EU funds.

	OTHER SOURCES OF FUNDING	The NRSF indicates national and regional funding for several measures, but does not specify amounts.	Once the federal budget is adopted, it could be clarified further which share of the funding referred to in the NRSF will benefit Roma equality and inclusion.
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PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING
The appointment of a Federal Government Commissioner for the Fight Against Antigypsyism can be expected to increase the visibility of Roma equality and inclusion policies and put them higher on the political agenda. The planned creation of an independent civil society reporting office to record incidents and attacks below the threshold of criminal liability follows up on a recommendation of the Independent Commission on Antigypsyism and is likely to improve monitoring and documentation. The establishment of an Antigypsyism Prevention Department at Heidelberg University of Education is an encouraging initiative and may have the potential for further upscaling to systematically include awareness raising about antigypsyism and other forms of racism in training for teaching staff. The federal programme “Living Democracy” proposes an extensive and holistic approach to address and combat antigypsyism and racism at state, federal, and local level and to strengthen civil society engagement and empowerment. State treaties concluded with Roma associations at regional (Länder) level that ensure support to Roma in the areas of economic, social, political and cultural life, promote active participation and regulate funding can be considered as a promising approach with replication potential in the area of fostering participation. The City of Dortmund has adopted a Roma-specific approach in its “Access to Housing” strategy, based on the objective of addressing specific housing needs of its target groups, including EU mobile Roma families.

GREECE	
APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	National Strategy and Action Plan for the Social Inclusion of Roma Strategy and Action Plan 2021-2030
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 175,000; 1.55% of total population. In line with the EU Roma Framework’s common but differentiated approach, this Member State was invited to make more ambitious commitments to Roma equality, inclusion and participation than other Member States
National Roma Contact Point (NRCP)	General Secretariat for Social Solidarity and Fight Against Poverty - Ministry of Labour and Social Affairs

NATIONAL ROMA CONTACT POINT	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRCP has a strong mandate, relevant resources and managing team to promote effective cross-sectoral coordination. It decides on the structure and operation of the Governance System for the Roma strategy. It is involved by EU fund managing authorities in the processes of coordination of cross-governmental discussions on the distribution of EU funds for Roma and in the relevant monitoring committees.	The NRSF contains limited details regarding the efforts for the NRCP to achieve better coordination and synergies with other national strategies and to strengthen the involvement of local authorities to promote local action plans for Roma inclusion. While the NRSF has identified a limited capacity of the Roma civil society, the measures foreseen to strengthen their capacity are not ambitious enough. The NRSF acknowledges deficiencies regarding coordination between NRCP and line ministries, but does not propose a scaled-up set of measures to address this issue. The National Roma Platform could serve the purpose of enabling dialogue between the relevant lines of ministries and civil society.

HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
Pillar 3 of the NRSF is devoted to the “Prevention and fight against discrimination and stereotypes against Roma” and includes specific measures such as promoting mutual trust and understanding and harmonious coexistence among Roma and non-Roma, ensuring the ability of Roma to report discrimination, training of police staff on preventive security and social mediation, training of civil servants and private sector on inclusion and diversity, increasing public awareness on diversity issues and dissemination of historical and cultural elements of Roma. The NRSF sets national targets responding to the EU level target included in the Framework (cut the proportion of Roma with discrimination experience by at least half; and decrease the proportion of general population who feel uncomfortable having Roma neighbours by at least a third) and additional national indicator. For all 4 indicators baselines and target values are provided together with the source	The NRSF does not clearly indicate a targeted approach to combatting antigypsyism, and therefore this is insufficiently addressed in the sectoral areas. Even though hate speech and hate crime are mentioned in the overall objective, the NRSF could have proposed a more targeted approach to tackle these matters. The proposed measures do not seem ambitious enough to respond to the needs and scale of challenges on the ground.

of data for baseline value.	
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes measures to promote awareness of Roma history and culture through dedicated activities during the Roma days of significance, a pilot programme to teach Romani language and to support Roma role models through involvement of Roma organisations.	The NRSF could have proposed a more ambitious approach including awareness raising campaigns in schools.
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
As part of the Pillar 1 of the NRSF, specific measures aim to reduce the socio-economic gap between Roma and the general population through the implementation of a minimum guaranteed income and allowances for uninsured elderly people, birth and unemployment, the promotion of inclusion in pre-school education for particularly vulnerable children, prevention and addressing child beggary, the access of Roma to food aid and coverage of basic material deprivation accompanied by psychological support, as well as transportation and energy subsidies. The NRSF sets national targets responding to the EU-level targets included in the EU Roma Framework. (cut poverty gap between Roma and general population by at least half; cut poverty gap between Roma children and other children by at least half). All the indicators baselines and target values are provided together with the source of data for baseline value.	The measures proposed to reduce the socio-economic gap seem to be primarily reliant on the mere provision of aid support. Such aid support provides a bare minimum and it does not seem to be sufficient enough to overcome the multigenerational poverty. The NRSF could have proposed the development of targeted integrated services in the community in order to address the root causes of poverty gaps.
3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
Pillar 4 of the NRSF devoted to “Promotion of active participation of Roma in social, economic and political life” includes measures aimed at strengthening self-management and emancipation of Roma in relation to their rights and obligations in personal, professional and social life; developing conditions for social dialogue, consultation and consensus in the local community; ensure Roma participation in the planning and monitoring	It remains to be seen whether the measures planned to enhance the participation of Roma in all spheres will in practice be ambitious enough to address the country specific challenges.

committees and bodies of the NRSF; strengthen the involvement of civil society and NGOs in issues relating to the NRSF; encouraging Roma participation in political life at local, regional, national and European level. The NRSF sets national targets responding to the EU level targets included in the Framework (capacitate and engage at least 90 NGOs in EU wide coordinated Roma civil society monitoring; ensure participation of Roma NGOs as full members in national monitoring committees for all programmes addressing needs of Roma communities; double proportion of Roma who file a report when they experience discrimination; encourage participation of Roma in political life at local, regional, national and EU levels (in Member States with significant Roma population) The NRSF provides baselines and target values together with the source of data for baseline value for the participation in political indicator. The NRSF includes an important target of increasing the percentage of Roma interested in politics to 30%.	
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SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	The NRSF, under Pillar 2 devoted to “Enhancing equal access of Roma to basic services and goods (education, employment, health, social care and housing)” includes measures to eliminate segregation, to increase Roma participation in pre-primary compulsory and upper secondary education, to reduce drop-outs and early leaving, to increase acceptance and tolerance and promote inclusiveness through school mediators as well as to train the teaching staff on the principles of intercultural education. The NRSF responds to all headline EU level targets included in the EU Roma Framework. (cut gap in participation in early childhood	The Strategy does not provide sufficient targeted measures on preventing and eliminating misdiagnosis and how to actively involve the parents. The limited communication with Roma communities hinders the effective collaboration between parents and schools and the fight against bullying. In the education field, the limited data collection and reliability of data makes it more difficult to identify the real needs for Roma pupils and students in education and training. The NRSF does not address the risk of digital exclusion as it does not address digital skills in education,

	education and care by at least half; reduce gap in upper secondary completion by at least one third; work towards eliminating segregation by cutting at least in half the proportion of Roma children attending segregated primary schools (in Member States with significant Roma population) The NRSF provides baselines and target values together with the source of data for baseline value for the former one.	broadband access, adequate digital infrastructure or the provision of teaching materials for distance learning. The monitoring and evaluation procedures are also limited and not targeted to the proportion of share of the population in schools.
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	Under Pillar 2, the Strategy aims to promote the active participation of Roma in the formal labour market, to reduce the employment gap between Roma and the general population and the gender employment gap for Roma women, and to decrease the proportion of Roma not in Education, Employment or Training (NEETs). To achieve these goals, the Strategy established specific actions such as individual counselling for unemployed people, integration employment programme, social support business incubators /advisory actions and vocational training, professional experience acquisition programme for young unemployed (18-29 years old), with a focus on high-demand sectors /industries, as well as the training of Roma mediators. The Strategy includes important targets such as increasing the percentage of persons aged 20-64 who reported as main activity “paid work” to 65% and decreasing the percentage of young people aged 15-29 in NEET to 55%, thus responding to the EU-level targets included in the EU Roma Framework.	The Strategy lacks indications on targeted measures aiming to reduce obstacles (e.g. lack of time, family responsibilities, and costs) for adults to take part in education and training. The Strategy lacks more information on baselines, benchmarks and funding allocation regarding the reduction of the proportion of Roma not in education, employment or training (NEETs).

6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	Under Pillar 2, the Strategy aims to reduce the life-expectancy gap between Roma and the general population and the Roma exposure to disease-related agents, to improve the coverage of Roma by early detection and intervention as well as the access to anti-dependency and social reinstatement programmes. To achieve these goals, the Strategy sets out specific actions such as awareness campaigns about healthy nutrition and prevention of smoking, vaccination and sexual and reproductive health programmes, and strengthening the access to prenatal screening and to addiction treatment centres. The NRSF sets a national target responding to the EU level target included in the Framework (cut life expectancy gap by at least half) For all these indicators baselines and target values are provided together with the source of data for baseline value. The Strategy includes an important target of increasing the share of Roma 16+ with health care to 90%.	The Strategy does not provide sufficient detail regarding a broader outreach to promote access to health, including concrete measures to reduce the gaps, as well as more targeted measures to support vulnerable Roma populations facing multiple discriminations such as Roma women and girls, pregnant women, Roma with disabilities, LGBTIQ Roma, etc.
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7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	Under Pillar 2, the Strategy aims to improve living conditions (adequate and quality non segregated housing, access to running water and basic infrastructure, elimination of living in crowded households) and the inclusion of Roma within urban planning. The NRSF sets national targets responding to the EU level targets included in the Framework (Reduce gap in housing deprivation by at least one third; Cut gap in overcrowding by at least half; Ensure that at least 95 % of Roma have access to tap water) For all these indicators baselines and target values are provided together with the source of data for baseline value.	The Strategy is unclear on how it will tackle spatial and housing segregation of Roma, and what are the measures to desegregate and integrate the Roma population within the wider community and ensure access of Roma to essential services. There is a need to develop appropriate housing solutions for Roma, matched with targeted services in order to facilitate their inclusion.
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MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	The Strategy provides baseline values based on FRA surveys and EU Scoreboard.	
TARGETS	The Strategy sets national targets responding to the EU level targets included in the EU Roma Framework, and additional non-quantified targets.	
INDICATORS	The Strategy uses all headline indicators from the EU portfolio of indicators complemented by selected secondary indicators and few national indicators.	

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	Roma representatives and civil society organisations have participated in the preliminary consultation process regarding the strategy, through structured questionnaires assigned to key stakeholder ministries, bodies and representative organisations of the Roma community.	The Strategy could provide more information on the state-of-play of readiness for implementation of the foreseen measures of the Regional Action Teams (e.g. staffing, equipment etc.) and the capacity building of Roma NGOs. Participation of the Regional

		The main mechanisms for monitoring the implementation are structured at three levels of cooperation, central (e.g. Cross-sectoral Committee on the National Roma Integration Strategy, National Advisory Committee on the Social Inclusion of the Roma, etc.), regional (Regional Action Teams, Regional contact points) and local (a first-level network of local authorities in areas with large Roma population). In addition, structures such as Forum Roma and Roma Platform (in collaboration with Roma grass roots organisations and international organisations such as UNICEF Europe) aim to create channels for networking, consultation and exchange of views on Roma inclusion.	Managing Authorities (responsible for the implementation of ESF+/ERDF-related projects) at the regional level of cooperation would be relevant.
	MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS	The Strategy ensures synergies with national strategies and action plans (e.g. against poverty, against racism, for public health, for gender equality, for the rights of the child, of people with disabilities, of LGBTIQ people) which are relevant in the field of social inclusion, aiming to achieve combined interventions, complementarity of actions, an economy of scale and maximising positive effects.	Measures targeting vulnerable groups of Roma who are exposed to multiple discrimination are not explicitly included. Gender responsive and child/age sensitive targets and measures need to reflect the principle of intersectionality and multi-vulnerability (targeted measures for Roma women, Roma with disabilities, older Roma, younger Roma, LGBTIQ Roma, etc.).
F U N D I N G	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	The sources of funding for the implementation of the measures and actions include resources from the European Structural and Investment Funds 2014-2020 and 2021-2027 (European Regional Development Fund, European Social Fund ESF+, European Agricultural Fund for Rural Development), as well as resources of the National Recovery and Resilience Plan and the “Rights, Equality and Citizenship Programme”.	The Strategy lacks the concrete amounts allocated to support implementation of Roma inclusion measures.

	OTHER SOURCES OF FUNDING	Other sources of funding include national resources both under the regular budget and under the Public Investment Programme, resources made available under the European Economic Area Financial Mechanism (EAA Grants) and private resources which may come from the management of legacies and corporate action.	The Strategy lacks the concrete amounts allocated to support implementation of Roma inclusion measures.
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PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

Poverty and social inclusion: The NRSF provides for measures to enable access to electricity for Roma. This includes subsidies to tackle energy poverty such as social household tariff, information and education for affected households under energy efficiency obligation schemes, ‘Save — Selfon’ programme, provision of an ‘energy card’ to affected households.

HUNGARY

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	Strategy (2021-2030) and action plan (2021-2024) Hungarian National Social Inclusion Strategy 2030 (18-08-2021)
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 750,000; 7.49% of total population National census (2011): 315,583; 3.16% of total population. In line with the EU Roma Framework’s common but differentiated approach, this Member State was invited to make more ambitious commitments to Roma equality, inclusion and participation than other Member States
National Roma Contact Point (NRCP)	Ministry of Interior, Deputy State Secretariat for Social Inclusion

NATIONAL ROMA CONTACT POINT	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRCP is headed by a deputy state secretary and has a strong mandate, dedicated financial resources and ca. 50 full-time staff. It issues opinions on relevant government decisions, contributes to the planning and implementation of relevant policies, and monitors their implementation in coordination with line ministries, local authorities and other actors. Changes in its setup are foreseen to reflect the needs linked to implementing the new NRSF. The NRCP is responsible for the programming of relevant EU funds and takes part in coordination and monitoring of the implementation of EU programmes. The NRCP engages with civil society through the Roma Coordination Council at national level, as well as through the National Roma Platform at county level.	The involvement of the NRCP in programme implementation and intergovernmental coordination at all levels could be further strengthened. Particular care should be taken to fully involve the entire spectrum of relevant stakeholders, in particular Roma and pro-Roma CSOs, in the design, implementation and monitoring of Roma equality and inclusion policies, including in the design of future Action Plans, in an inclusive and transparent manner. The transparency of the Roma Coordination Council should be strengthened with regard to its composition, proceedings, documentation of meeting outcomes, and its role in implementing, monitoring and reviewing the NRSF.

HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes measures such as awareness raising for public services staff, measures to combat discrimination against Roma, prevent hate-crime and hate speech, implement programmes to raise mutual awareness and foster cooperation among different groups, and strengthen the role of the Ombudsperson. Further measures are aimed to improve legal awareness of disadvantaged people, and strengthen active involvement of Roma women. With regard to sectoral policy areas, the NRSF establishes measures to reduce exposure to online risks (e.g. cyberbullying) in the field of education, as well as measures to tackle discrimination in employment.	While the NRSF reflects key requirements of the EU Roma Strategic Framework, some of its measures to reduce discrimination and combat hate speech and hate crime remain vague. More attention could be paid to diversity among Roma, tackling structural and multiple discrimination, online hate speech, and providing victim support. Measures to combat cyberbullying could be complemented by measures to prevent off-line bullying. The NRSF refers to antigypsyism in its analytical sections; however, it lacks specific measures explicitly dedicated to fighting antigypsyism. While the NRSF acknowledges an increase in school and spatial segregation, its measures do not appear ambitious enough to prevent and eliminate segregation.

	The NRSF does not define quantitative targets or indicators for this specific area, but states in general terms that EU level targets are considered applicable.
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes awareness-raising measures aimed at young people, measures to promote positive role models and Roma culture and history, as well as programmes to support minority culture, as well as literacy in the Romani and Boyash languages. Education about Roma culture and history and about the Roma Holocaust has been part of the general secondary school curriculum since 2013.	As a whole, the proposed measures reflect the requirements of the EU Roma Strategic Framework and the Council Recommendation; however, educational activities primarily appear to continue existing measures and could be further scaled up and expanded. Some of the support schemes mentioned have significant limitations in terms of the number of beneficiaries.
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF covers social inclusion horizontally across sectoral policy areas. Main elements include ensuring access to child protection, family support and housing benefits for all families, tackling housing difficulties, providing advice and training on debt and household management and financial awareness, as well as measures to promote solutions to prevent and eliminate usury. The NRSF defines quantitative social inclusion baselines and targets (reducing poverty for families with children from 22.9% to 13%; reducing the poverty gap from 38.7% to 20%) and provides for a review and update of indicators.	Additional measures could be developed to address the challenge of limited assistance for job seekers, as well as the lack of effective access to unemployment benefits for a significant share of unemployed people. Care should be taken to ensure that minimum income benefits and family allowances reflect the cost of living.

3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes measures to strengthen dialogue across sectors and with civil society, support youth CSOs, strengthen active involvement of Roma women and their work in local communities, and improve legal awareness of members of disadvantaged communities. It aims to ensure equal access to cultural goods and services, support activities locally, provide support to minority self-governments and implement community development programmes.	There could be a stronger focus on capacitating Roma civil society as a whole in addition to the targeted support for youth CSOs. The focus on cultural activities and local community development should be complemented by promoting broad and active participation of Roma people in civic and political life. Some measures for community development appear to target mainly segregated settlements without clear desegregation targets, which might run counter to the aim of eradicating spatial segregation and including the Roma population into the wider society. In this area, the NRSF doesn't define a baseline, indicators or quantitative targets.

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	The NRSF includes measures to ensure the supply of specialised teachers and making the profession more attractive, encourage peer involvement in teaching disadvantaged pupils, and reducing exposure to online risks such as cyber bullying. Measures at primary and secondary level aim to develop inclusive school environments, continue desegregation and enforce measures to prevent segregation, support inclusive education, prevent institutional abuse of children, and protect children's rights. Measures to overcome educational inequalities include developing digital competences of pupils, parents, teachers, providing targeted support to Roma girls and vulnerable pupils, prevent early school-leaving, improving IT	Measures to tackle educational segregation should be significantly strengthened and scaled up, including with regard to eliminating existing segregation, combatting segregation at pre-school level, as well as at all educational levels, and addressing inequalities that may arise from the application of mainstream educational policies (such as different rules for state vs. non-state schools, catchment area rules etc.). Measures to promote participation in quality mainstream education (e.g. educational tracks leading to 'matura') and reduce early school leaving should be reinforced to avoid that a high share of Roma youth leave education without being equipped for stable employment. Objectives such as improving availability of qualified teachers and providing incentives to work with disadvantaged pupils should be reflected in specific and targeted measures. Measures to tackle cyber

	infrastructure, improving access to early childhood education, providing career guidance and mentoring, as well as promoting participation in higher education. For areas such as early school-leaving and educational attainment, baselines and target values are provided.	bullying should be complemented with measures fighting off-line bullying. Baselines and quantified targets on combatting segregation are not defined in the NRSF and should be included. .
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	Main measures in this area include further developing the youth guarantee scheme, increasing the employability of disadvantaged people, including Roma, and providing incentives to encourage their employment, as well as developing basic skills and providing access to vocational training, retraining and further training according to labour market requirements, supporting on-the-job training, digital literacy development, job placement and job retention with the involvement of mentors and employers. The NRSF also provides for better targeting of the public works scheme, as well as measures to support reintegration of public workers into the primary labour market, improving outreach and support to disadvantaged settlements, strengthening lifelong learning, promoting the social economy and backyard farming programmes, encouraging employment of Roma workers through public procurement measures favouring companies employing Roma, and tackling discrimination in employment. The NRSF explicitly refers to two headline targets included in the EU Roma Framework (employment and NEET rate) with baseline and target values.	Measures to tackle discrimination in employment should be further strengthened and clearly defined. Care should be taken to ensure that salaries in the public work scheme reflect the rising cost of living. The high early school leaving rate among Roma and the concentration in lower-quality educational tracks needs to be significantly reduced to avoid limited access to employment.

6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	Measures in this area aim to improve access to health services for pregnant women and young people, and support community actions for individual skills acquirement for a healthy lifestyle. They further include raising awareness about how to access social security, strengthening primary healthcare, developing the competences of healthcare actors and cooperation between them, reducing harmful behaviour such as smoking and alcohol consumption, incentivising work in disadvantaged settlements for doctors, developing the health visitor network, strengthening mobile health services and the capacity of local mediators, supporting family planning as well as awareness raising in schools.	Barriers to accessing healthcare such as discrimination, distrust of authorities, low availability and accessibility of services in areas with a high share of Roma populations should be more directly addressed to reduce health inequalities. The NRSF doesn't include a baseline, indicators or target to measure progress towards the EU Roma Framework's headline target for life expectancy, with low data availability being a critical constraint.
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	Main measures in this area include continuing the Catching-up Municipalities Programme and implementing integrated territorial programmes at county level, improving provision of and access to basic services, housing and infrastructure, developing phone and internet access, tackling energy and transport poverty, preventing evictions, making more efficient use of social inclusion tools at the disposal of local governments, as well as preventing the emergence of segregated areas and promoting housing mobility and desegregation.	Measures, expected outcomes and results with regard to spatial desegregation should be further clarified and better correlated with targets and indicators. It should be clarified what measures are in place to prevent and combat segregation regarding actions currently described in the Strategy. Energy poverty and housing deprivation could be addressed through more ambitious measures and in a systemic manner. Baselines and targets could be defined closely in line with the EU level targets.

MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	For a majority of areas, the NRSF sets out baselines that are linked to the EU level objectives.	National baselines could be defined towards all EU objectives and targets based on a comprehensive needs-assessment.
TARGETS	The NRSF defines quantitative targets that can contribute to achieving EU level targets.	Not all EU objectives are covered by quantitative targets, and some quantitative targets remain slightly below the ambition of the EU level targets. National targets could be defined more closely in line with EU level objectives and targets based on a comprehensive needs assessment.
INDICATORS	The NRSF refers to the EU portfolio of indicators and foresees reviewing, maintaining and updating the set of indicators to be used.	Monitoring and reporting arrangements mainly relate to existing programmes, but do not include a dedicated monitoring framework for the implementation of the NRSF as a whole. Active involvement of all stakeholders in monitoring should be ensured. Indicators could be defined more closely in line with EU level objectives and targets.

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	At national level, involvement of the equality body and civil society is ensured through the Roma Coordination Council. Coordination at local and regional level is ensured through the Social Inclusion Directorate and its five regional institutions, as well as local equal opportunity roundtables. The National Roma Platform functions at county level, involving the NRCP and actors such as local governments, CSOs and churches.	The transparency of the Roma Coordination Council should be improved, and its composition, proceedings, and meeting outcomes should be documented in an easily accessible way. Transparency and inclusiveness of cooperation with civil society should be strengthened in order to encourage the broadest possible participation of Roma and pro-Roma CSOs.
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION	The NRSF provides an overall framework for relevant national strategies (such as the “Better for Children” Strategy, and the 2019 New Roma Strategy targeting disadvantaged settlements) and	Care should be taken to ensure effective equal access of Roma to mainstream services and to avoid duplicating existing services. More attention should be paid to

WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS		sectoral policies. It places its measures into the context of relevant EU programmes such as the European Child Guarantee. The NRSF includes a number of measures addressing the needs of Roma women, children and youth.	tackling multiple and intersectional discrimination and addressing the specific needs of different groups within the Roma population, both through targeted measures and as part of mainstream policies and frameworks.
FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	Relevant future programmes, such as under the ESF+ and ERDF, which foresee measures relevant to Roma inclusion, are currently negotiated.	The strategy does not provide details about the intended use of EU funding programmes and instruments. These should be included. The NRSF should further explain more clearly how the various funding streams complement each other.
	OTHER SOURCES OF FUNDING	The NRSF lists all relevant national programmes supporting marginalised communities such as Roma. It mentions an overall allocation of 0.7% of the 2017 central budget for social inclusion.	It is hard to determine the share of the social inclusion budget specifically benefiting Roma. There is no mention of a dedicated budget for implementing and monitoring the NRSF. This information should be included.

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

The "Bari Shej" programme, which supports school completion by Roma girls with the help of positive Roma role models, can be highlighted as promising. Further details about number of participants and their school completion rate would be welcome.

Hungary has an innovative approach in gathering data disaggregated by ethnicity: the ethnic dimension is added to the EU surveys (e.g. EU-SILC). This provides an important tool for monitoring needs and developing policy responses.

IRELAND

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	The National Traveller and Roma Inclusion Strategy 2017-2021 (NTRIS) expired. Assessment was made based on a Questionnaire.
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 37,500; 0.84% of total population National census (2016): 30,987; 0.7% of total population
National Roma Contact Point (NRCP)	Department of Children, Equality, Disability, Integration and Youth

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
	The questionnaire does not mention the national Roma contact point.

HORIZONTAL OBJECTIVES

1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION

1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA

KEY FEATURES	AREAS FOR IMPROVEMENT
Key initiatives include the adoption of new legislation concerning hate speech and hate crime, the training of police forces, the development of ethnic liaison officers aiming to prevent hate crime, provide assistance to victims and encourage reporting.	The questionnaire remains unclear on the specific Roma dimension of the measures mentioned and lacks general awareness raising campaigns to tackle discrimination and harassment among the general population and online.

1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION

KEY FEATURES	AREAS FOR IMPROVEMENT
Through its strategy, Ireland has recognized Travellers as an ethnic group of the Irish nation and celebrates Traveller Pride Week and International Roma day with state funding for the organisation. Actions to preserve Roma arts and culture include the creation of an online portal, supporting community-based initiatives to promote positive narratives and an increased sense of pride.	There are no specific measures concerning the Romani language and the teaching of Roma history and culture in schools. Promotion of positive narratives about Roma and Roma role models are not specifically mentioned.

2. REDUCE POVERTY AND SOCIAL EXCLUSION

KEY FEATURES	AREAS FOR IMPROVEMENT
	This objective is not covered by the questionnaire.

3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
The strategy aims to increase participation through the consultation of Traveller and Roma people in drafting policies and legalisations, through target support to Roma women and youth and through annual grant funding to organisations.	The questionnaire remains unclear on concrete measures to enhance participation and does not contain actions for building the capacity of Traveller and Roma organisations.

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	The questionnaire contains measures to target attendance and participation of Roma and Traveller pupils, to train teaching staff about interculturality and anti-bullying, programmes to celebrate diversity and promote inclusion, to support vulnerable families with special education teachers, provision of school meals, liaison coordinators or book grants.	The questionnaire lacks details of measures to tackle segregation in education and to develop digital skills of Roma pupils. Moreover, there are no specific measure targeting Roma girls.
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	To support Travellers and Roma employment, the NTRIS contains measures to promote apprenticeship, to support local entrepreneurship and to develop legal advice for victims of discrimination. The Special Initiative for Travellers provides specific training in literacy, numeracy, and soft skills, as well as specific employment opportunities. Dedicated measures for Travellers and Roma youth include education, training and support scheme.	The questionnaire does not include targeted measures towards women and training of employers.
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	The NTRIS developed Traveller Health Units across the country coordinating a dedicated health policy with the engagement of the community through Travellers mediation services.	The questionnaire remains vague about the concrete work of those units including about measures on maternity and child care as well as sexual and reproductive health.

7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	The new “Housing for All” plan includes specific measures for Travellers. The questionnaire also indicated that special provisions are given to local authorities to support Traveller accommodation and that they can benefit from a caravan loan scheme.	There are no details specified of the measure targeting Travellers in the mainstream housing plan. The issue of housing segregation is not addressed.
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MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE		Baselines would need to be included to allow measuring progress towards the EU Roma Framework’s headline targets.
TARGETS		There are no quantitative and qualitative targets defined. Targets should be defined in line with the EU Roma Framework’s objectives and headline targets.
INDICATORS		There are no quantitative and qualitative indicators defined. Indicators should be defined in line with the EU Framework’s objectives and headline targets, building on the EU portfolio of indicators.

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	Representatives of both Traveller and Roma communities are permanent members of NTRIS Steering Committee which oversee and drive the strategy’s implementation and monitoring. This Committee is chaired by the Minister for Children, Equality, Disability, Integration, and Youth.	The implementation and monitoring processes lack cooperation with local authorities.
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS	Roma equality and inclusion is connected to other national policies and strategies in various areas: migrant integration, LGBTI inclusion, employment, gender equality, education, health and housing.	

F U N D I N G	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)		There is no budget provision. Further use of existing possibilities under the EU funds to support minorities' inclusion could be considered.
	OTHER SOURCES OF FUNDING		There is no budget provision.

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

The 2017-2021 strategy highlighted a number of promising practices in the area of education, employment and health, as well as youth participation. Measures in the area of education and employment include: the Yellow Flag Programme, a whole school initiative which supports schools to celebrate diversity, promote inclusion and challenge racism; the National Action Plan for Apprenticeship aimed at ensuring that under-represented groups, including Travellers, form a greater proportion of the apprenticeship population; the Pathways to Work Strategy for 2021-2025 which includes targeted initiatives to increase Traveller and Roma engagement with employment and training services; the Youth Guarantee Commitment aiming to guarantee that Travellers and Roma under the age of 25 who register as unemployed claimants of Jobseekers' payments will receive continued education, apprenticeship/traineeship, or a good quality offer of employment, within a period of four months of registering.

In the area of health, dedicated expenditure was made available for Traveller and Roma, such as the establishment of Traveller Health Units nationally aimed at providing primary health care to Travellers in a culturally appropriate service model; Traveller health officers working on developing a Traveller health policy and coordinating implementation of the Traveller health action plan; and the Traveller Primary Health Care Projects: a community engagement initiative aimed at building trust between Traveller communities and health professionals at a local level.

With regard to youth participation, the Department of Justice had established an internship programme for members of the Traveller community which aims to promote the participation and inclusion of the Traveller and Roma community in the Irish society.

ITALY

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	National Roma and Sinti equality, inclusion and participation strategy
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012) : 150,000; 0.25% of total population
National Roma Contact Point (NRCP)	National Office against Racial Discrimination (UNAR)

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes measures to strengthen the inter-institutional coordination of the National Roma Contact Point UNAR, with the central and regional administrations. The NRSF foresees the establishment of a network of metropolitan cities and municipalities, coordinated by the National Contact Point, strengthening of the role of the NRCP in terms of human resources (also through a progressive involvement of Roma and Sinti professionals and experts) and development of instruments to enhance its ability to coordinate the National Strategy at national level. The measures also refer to a more active role of the NRCP in the definition of a monitoring and assessment system. The NRCP has established a regular form of dialogue and cooperation via the National Platform and Forum, and measures also foresee further improvement of this Platform. UNAR was involved in the inter-institutional dialogue for the preparation of the 2021-27 Cohesion Funds proposal. Additionally, UNAR is directly involved in the preparation of the implementation of the 2021-2027 National Programme on Social Inclusion and Poverty.	Although UNAR, both as NRCP and Equality Body, has a dedicated team and institutional mandate to oversee the implementation and monitoring of the Roma Strategic Framework, it lacks the authority to fulfil an adequate role of coordination, monitoring and exchange with institutional stakeholders, especially at local and territorial level. The overall short political mandates of UNAR seem to affect a steady implementation of the foreseen measures but also challenge the effective coordination role. The NRCP seems not to have the authority to coordinate the Roma related work with local authorities (e.g. regional programs) and funding of specific actions.

HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF presents the fight against antigypsyism as one of the transversal pillars of the four axes outlined in the specific chapters. The set of measures includes strengthening the role of the UNAR in the collection of reports of direct and indirect discrimination against Roma and Sinti people; better monitoring of hate speech; victim support activities with particular reference to certain groups most at risk of multiple and intersectional discrimination such as women, children, LGBTIQ people, people with disabilities, stateless people; legal support activities, in close cooperation with the associations of the Community Forum and the UNAR, promoting continuous and recognised training activities for categories of public officials and others (healthcare workers, doctors, nurses, social workers, police, court staff, school staff and media professionals), aimed at the knowledge of Roma and Sinti cultures, language and history, including remembrance of persecution; launching a specific survey on the level of antigypsyism in society; promoting information campaigns, communication and positive narratives, etc. The NRSF includes qualitative targets as well as quantitative indicators for monitoring and evaluation of the proposed measures.	All the measures proposed to address the needs of Roma and Sinti people, are based mainly on projects and are not scaled up as part of national reforms or within mainstream measures and initiatives. The phenomenon of intersectional discrimination: (especially with regards to third-country nationals or stateless persons and Roma with non-Italian citizenship) needs more attention and effort. Challenges in access to housing continue to be a persistent issue in Italy and is not sufficiently addressed in the NRSF. Segregation in education is also vaguely referred too but not tackled with solid measures. The NRSF does not sufficiently align with the mainstream strategies addressing the vulnerability of Roma and Sinti to trafficking in human beings from a broader perspective. There is only a reference in the strategy in connection to early childhood education. Combatting hate speech and hate crime based on antigypsyism are not sufficiently addressed. The NRSF does not have budget allocations.
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF does not have a specific objective or pillar to address this area, however it includes measure supporting the teaching of Roma and Sinti history and its inclusion in school curricula and teaching materials. These refer to a balanced and contextualised teaching of Roma and Sinti history and information on the contribution that the Roma and Sinti have made to national economies.	As Roma and Sinti are not recognised as a minority group, it makes it very difficult to have the Roma Genocide /Holocaust recognised nationally, or to that extent have the Roma history and language an integral part of the school curricula. Some indicators have been developed. There are no clear budget allocations.

The development and revision of teaching materials and methods aim to prepare flexible curricula and interactive pedagogies that recognise cultural differences, promote diversity and adopt a multi-perspective approach to capture the full complexity of history and ensure that a shared history is taught etc. It includes qualitative targets as well as quantitative output and outcome indicators for monitoring and evaluation of the proposed measures.	
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
Fighting multi-generational poverty is developed through child protection measures; resources for early childhood education and care (e.g.: scholarships, tutoring, after-school care), nutrition, personal development and work with families. Participation in early childhood education and care is also accompanied by the protection of women, children and young people through strategies to fight crimes such as trafficking in human beings, including all forms of exploitation (sexual exploitation, labour exploitation, forced begging and the use of criminal activities aimed at forced marriages and sexual exploitation). Particular attention is paid to people with disabilities and children deprived of parental care, preventing institutionalisation and supporting vulnerable families. The strategy defines some indicators inspired by EU portfolio of indicators (ex: number of inter-institutional coordination groups on the access to housing created, number of implementing protocols established, etc.).	The planned measures do not present a holistic/integrated approach, lack ambition and are solely based on projects, for which the responsible institution that should oversee the implementation does not seem to have assumed accountability. This has been reported as problematic in the NRSF itself. The measures proposed are set only at the planning level, without a defined budget allocation.
3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
The third pillar of the NRSF proposes interventions in the area of promotion of Roma and Sinti participation mainly via the National Roma and Sinti Platform and the Community Forum. The measures include support for active citizenship, in particular of Roma and Sinti women and youth; promotion and development of skills and competencies; education in human rights and responsibilities; coordination of resources, networks	The measures proposed are set only at the planning level, without a defined budget allocation. The NRSF lacks in concrete measures to promote or enhance representation of Roma in public and political life. No specific indicators are set for the participation of Roma civil society.

and expertise in all areas to increase the involvement of young Roma in decision-making processes and help strengthen their leadership. The strategy proposes a first phase of participatory research (with Roma and Sinti women and youth) as a proposed action to recover and legitimize representation, challenging the stereotypes and discrimination dominating public debate. Despite the fragmented Civil Society in Italy, the NRCP brought together an important number of CSOs, in a structural dialogue of the National Platform Forum for Roma and Sinti. The NRSF includes some qualitative targets.	
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SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	The two objectives of the NRSF “Increase equality of effective access to quality inclusive mainstream education” and “Increase effective participation of Roma in mainstream inclusive quality education” envisage a set of interventions, defined as the tools of school inclusion, with reference to Roma and Sinti communities, to be included within the projects to be carried out at national and local level. Additionally, measures include activities such as carrying out a territorial sample survey on the level of early school drop-out of children from Roma and Sinti communities, launching of a national research project on the level of inclusion of Roma and Sinti children in the school system, interventions on "families and school", facilitating access to services in the 0-6 age bracket, or promoting positive action with the purpose of continued education and training (e.g. study scholarships), etc.	Most of the measures proposed have a focus on awareness raising, training and studies, while structural issues are not approached directly. Segregation in education is acknowledged in the strategy only in relation to residential segregation. The measures proposed to combat segregation are limited and the strategy does not propose a more integrated approach to tackle it, for instance in connection to housing and other services. Baselines are not yet defined for this area and there are no budget allocations.

	The NRSF includes qualitative targets as well as quantitative indicators for monitoring and evaluation of the proposed measures.	
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	The NRSF establishes two specific objectives “Encourage the promotion of training and non-discriminatory access to projects aimed at entering the labour market” and “Activation of active policies, tools, devices and support for the regularisation or replacement of self-employment and entrepreneurial development”. The two objectives include measures such as work coaching activities, intermediation with the labour market to identify job requirements and opportunities, tailor-made actions to support self-employment, etc. The NRSF establishes indicators to measure the outcome of the proposed actions.	The volume of the planned measures appears insufficient when taking into account the scale of the unemployment, the increased vulnerability after COVID19 and the 2030 EU level targets. Therefore, measures will need to be scaled up and properly budgeted, so that they contribute to meeting the EU targets. Given that labour integration measures have a greater chance of success when Roma and Sinti are involved as mediators/facilitators, social workers or other service providers, a greater emphasis should be placed on promoting interventions in this sense. While some actions on combating discrimination in the framework of the labour market, that can be directly implemented by the National Roma Contact Point, are planned in the 2021-2027 ESF+ and ERDF national programme for Inclusion and Poverty reduction, the involvement of regions, as main responsible for employment policies, is essential. Few regions have planned targeted or mainstream actions in this field (for example, the Region Apulia has allocated about 9 MIL EUR of its ESF+ budget to support the socio-economic inclusion of the Roma population) There are no budget allocations in the strategy.

6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	The NRSF includes a set of five specific objectives /measures, focused on developing and validating information tools for hard-to-reach groups to favour orientation towards social and healthcare services and materials for health education. Proposed measures include: support the use of Roma and Sinti mediators /facilitators in healthcare; promoting discussion and exchange of information between public health services, municipalities, non-profit bodies and Roma and Sinti communities; training of Roma and Sinti mediators /facilitators at the level of local health authorities, and spreading the culture of Public Health for marginalised and remote localities (SPP) to take on hard-to-reach groups, with particular reference to Roma and Sinti populations. The NRSF sets a national target responding to the EU level target included in the Framework (Cut life expectancy gap by at least half) The NRSF includes qualitative targets as well as quantitative output and outcome indicators for monitoring and evaluation of the proposed measures.	The measures proposed are not sufficient to tackle the acute health challenges faced by the Roma living in settlements. This area needs to be addressed properly via an integrated approach, especially in connection to housing and water and sanitary utilities, access to medical services which occasionally is left at the disposal of volunteers, or the lack of identity documents, which hinders access of Roma to basic services. The implementation of social inclusion policies for Roma and Sinti communities falls within the responsibility of the local authorities, however the NRSF does not seem to integrate an appropriate cooperation mechanism. There are no budget allocations. While the NRSF uses an EU headline indicator for this objective – difference in life expectancy at birth – it does not provide a baseline and target values.
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	The specific objective of the NRSF is to Promote housing solutions that meet the specific needs and requirements of Roma and Sinti families. The NRSF includes measures such as promotion of surveys and research activities, strengthening the capacity of local authorities, establishment of an inter-institutional unit to promote access to housing and support the implementation of local, regional	The scope and scale of interventions in the field of housing is largely insufficient, therefore the package of measures needs to be scaled up in order to achieve meaningful impact. There is a need for a serious approach with the proper involvement of the relevant local and central authorities in order to overcome the camps-system, carried out within an integrated approach addressing simultaneously challenges in the area of education,

	and national public policies on access to social housing, the private market and other forms of housing. Initiatives proposed also include the harmonisation of the criteria for accessing social housing and implementing different co-existing actions and approaches (housing first, cohousing, support to access to credit, etc.). The NRSF includes qualitative targets as well as quantitative targets and indicators for monitoring and evaluation of the proposed measures. Targets for 2030 indicate a reduction (by at least one third of the gap) in terms of housing poverty (the gap is 43%, to be reduced to at least 30%, in terms of overcrowding (the gap is 60%, to be reduced to 40%.	health and labour market. Despite the very precarious living conditions of the Roma people in informal settlements, the healthcare aspects are largely omitted. The NRSF does not properly tackle the issue of stateless Roma, or the issue of lack of IDs. Budget allocations are not secured.
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MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	The NRSF does not set baselines. It formulates specific objectives (not quantifiable).	National baselines could be developed towards the EU objectives and targets.
TARGETS	The NRSF provides needs assessment for each covered area, however it points to a shortage of reliable data. Plans of measures for individual objectives include some expected outcomes of the planned actions. The NRSF includes national qualitative targets for each covered area. The NRSF does not address all objectives of the EU Roma Framework.	As the NRSF does not make a solid use of baselines and has not established ambitious targets towards the EU objectives and targets, it is unclear how progress will be monitored, and achievement of targets will be measured. National targets could be defined more closely towards the EU Roma Framework's objectives and targets, based on a comprehensive needs-assessment.
INDICATORS	The NRSF does not use the EU portfolio of indicators, with the exception of life expectancy indicator. The NRSF defines for each covered area indicators and targets for monitoring the proposed measures as well as the outcome indicators for their evaluation.	Indicators could be defined closely in line with EU level objectives and targets.

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	The NRCP is also the Equality Body, thus it pursues cases of discrimination, hate speech and hate crimes, and pursue strategic litigation. Moreover, UNAR raises awareness of rights among Roma and conducts research into and collect data on equality of and discrimination against Roma. The NRCP has established the National Roma and Sinti Platform, which provided space for consultation on the NRSF, both with the Civil Society and the relevant line Ministries.	The NRSF foresees structural involvement of local and regional authorities in the implementation of the measures foreseen. The role of regional and local authorities is determinant for an effective implementation of the NRSF as main competences in the field of employment, social inclusion, health and housing lies with them. Nevertheless, a political endorsement of the plan would be needed in order to ensure the compulsory engagement of regional and local authorities in implementing the actions.

		The NRSF promotes the capacity building of civil society and third sector bodies, by reforming the Platform, promoting participation of young Roma and Sinti, promoting participation of Roma and Sinti in the Monitoring Committees of the NOPs and ROPs, active participation in the monitoring of the NRSF etc.	The NRCP office does not have enough resources and attributions to oversee this implementation at regional and local level. The capacity building component needs to integrate a wider approach so that it responds to the needs of a wider pool of civil society organisations, beyond those that are part of the Platform and the Forum.
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS		The Strategy refers to promoting mainstreaming and key features with the Anti-Racism Action Plan, the LGBTIQ Strategy and the European Child guarantee. There is no proposed combination of mainstream and targeted measures to consider specific local challenges and explicitly address barriers depriving Roma of equal access to mainstream policies. The NRSF acknowledges multiple discrimination, and it includes measures targeted at Roma women and youth.	The NRSF is lacking clear information on mainstreaming Roma equality and inclusion at regional and local levels as well as on how EU, national funds and other financial instruments will be invested for inclusive mainstream policy reforms and targeted action. There is insufficient information in the strategy about connection with mainstream health, education, housing or labour market policies.
FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	The NRSF mentions the use of 2021-2027 Cohesion Policy funding and actions for the promotion of the integration and inclusion of Roma are planned in the 2021-2027 Partnership Agreement. It also refers to the mainstream actions in the field of employment, social inclusion, and education, funded by EU Cohesion policy, which could also benefit Roma communities. The NRSF makes also reference to the possible contribution of various national and regional funds in implementing the plan, but it does not include a precise	The strategy does not provide a clear framework for how EU funds will be used to address the needs of Roma communities. Information at the level of each EU cohesion funds is available at the level of each adopted programme. The NRSF should have made available in more detail on how the implementation of its objectives will be supported by investments from EU funds.

		allocation of funding to its implementation.	
	OTHER SOURCES OF FUNDING	There is no indication of national budget allocation for any of the measures foreseen.	The Strategy does not provide enough information on budget allocations for the set measures.

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

The National Platform and the Community Forum represent operational tools for dialogue between the UNAR, civil society, central and local administrations involved in the National Strategy. The Platform and the Community Forum were established by Decree (REP/D 44 2017) of the Head of the Department for Equal Opportunities of 11 September 2017, following an expression of interest published on 29 May 2017, with the admission of 79 associations from all over the country. This instrument was created with the aim of bridging the gap in the mechanisms of dialogue between institutions and civil society and allowed an open dialogue between members and delegates on specific thematic areas with central and local administrations. The decree is available [here](#).

LATVIA

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	Plan for Implementing Measures of the Roma Strategic Framework; Action Plan 2022-2023
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 12,500; 0.56% of total population National census (2021): 6,842
National Roma Contact Point (NRCP)	Ministry of Culture, Department of Society Integration Affairs

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
The National Roma Contact Point (NRCP) is part of the Ministry of Culture. Its tasks are carried out by one civil servant, who also works on other issues outside the competences of NRCP. Within the framework of the Latvian Roma platform projects, a project assistant is employed to assist the NRCP. Since 2012, the Ministry of Culture has had an Advisory Council for the Implementation and Coordination of Roma Inclusion Policy. The Advisory Council aims to assess and develop the implementation of the Roma inclusion policy and promote civic participation as well as strengthen cooperation between the Roma community and public administration. As from 2021, the Advisory Council includes representatives of state institutions and agencies, as well as representatives of Roma and non-Roma NGOs.	The NRCP could be further strengthened through the allocation of a full-time assignment for the official working on Roma inclusion.

Within the framework of the Latvian Roma platform projects, dialogue, mutual learning, and cooperation between public authorities, civil society, and Roma communities have been ensured through activities such as: seminars and workshops for municipal specialists and Roma representatives, informative events, and publications on the history and culture of the Roma in Latvia, as well as support for Roma mediators in Latvian municipalities.	
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HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
Awareness campaigns on antigypsyism will be conducted on major social networks and through Roma radio broadcasts. Academic research and seminars regarding the situation on human rights and hate speech and hate crime targeting Roma will also be developed. The plan strengthens the capacity of NGOs to engage in the fight against intolerance and encourages participation of the Roma in the defence of their rights and interests. A course on rights literacy for representatives from the Roma community, Roma mediators and Roma teaching assistants has been created. The plan sets national targets which respond to the EU-level target of the EU Roma Framework (cut the proportion of Roma with discrimination experience by at least half; decrease the proportion of general population who feel uncomfortable having Roma neighbours by at least a third)	The next plan could propose measures to combat antigypsyism and discrimination in the sectoral areas of employment and healthcare.
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The plan includes measures such as raising public awareness about the commemoration of Roma Holocaust, promoting the International Romani Culture Festival, implementing educational events at the Museum of history and art of the Roma and the digitalisation of its exhibition.	Promotion of positive narratives about Roma and Roma role models are not specifically mentioned.

Training on Roma history and culture is also ensured for teachers and other school staff.	
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
In order to fight exclusion, the plan provides for the launch of services to be delivered by family assistants, and services for boosting motivation and support for people in targeted groups.	The plan does not include measures to fight poverty nor does it detail mechanisms on how Roma will be reached by the mentioned services.
3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
Cooperation and dialogue are mainly promoted through the Latvian Roma Platform facilitating dialogue between the Roma community and civil society organisations as well as developing effective coordination of the Roma inclusion policy. Through its NGO programme, the plan aims to enhance the capacity-building of Roma organisations and to create a regional expert network developed on Roma integration issues.	

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	The plan is promoting better access to education of Roma pupils through Roma mediators, especially to early childhood education and primary education, as well as to scholarship programmes for higher educational studies. Cooperation between teaching assistants and parents is fostered to reduce early school leaving and to increase the inclusion of Roma pupils with special needs. Teaching staff will be trained on inclusion and diversity matters. The plan addresses the issue of possible misplacement of Roma pupils in special needs schools. by awareness-raising in the medical profession to ensure a fair diagnosis based on objective medical criteria, and not on discrimination	More systemic measures could be developed to tackle illiteracy, and to promote the use and teaching of Romani language.

5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	The plan intends to enhance the access to employment for Roma people through personalised career support and free careers counselling and development of literacy skills for unemployed Roma people. Young NEET Roma can also benefit from measures to help them return to education or the labour market.	The plan could include measures to fight discrimination from employers, to foster Roma entrepreneurship, and to close the employment gap between men and women.
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	The plan uses Roma mediators to disseminate information to the Roma community to improve their health literacy on sexual and reproductive health and preventing the use of addictive substances.	The plan could include measures to increase the health insurance coverage of Roma and to train health professionals. The current plan does not include measures targeting child and pre-natal care. The plan could include measures to combat antigypsyism and discrimination as obstacles to access to healthcare. No precise information is provided regarding budget allocations.
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	The plan's main measure concerning housing is to renovate and develop affordable social housing by ensuring sufficient State aid and support local governments. The selection of beneficiaries will target firstly people with vulnerabilities and families.	The proposed measures are generic. Roma people could potentially benefit from them, but the Plan does not sufficiently details how.

MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	The plan provides baseline values based on the 2015 study “Roma in Latvia”, the 2019 FRA survey and on the 2021 study “Intercultural Stereotypes and Prejudices in Latvia”.	
TARGETS	The plan defines quantitative targets for 2024 based on national performance indicators.	Targets could be defined more closely in line with the EU Framework’s objectives and targets.
INDICATORS	The plan uses ten national performance indicators.	There are no quantitative and qualitative indicators defined in the areas of health and housing. Indicators could be defined more closely in line with EU level objectives and targets.

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	The plan was elaborated through an interinstitutional cooperation including representatives of ministries, states agencies for youth and employment, the equality body, Roma and civil society organisations. A public consultation involved the Advisory Council for Implementation of the Roma Integration Policy and the Roma Culture Centre.	The national Roma platform could also play a key role in the implementation and monitoring process.
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS	The plan is aligned with several strategies including the national Development Plan and the Guidelines for the Development of a Cohesive and Civically Active Society for 2021-2027, as well as policies in the field of education, health, social protection and labour market, industry and housing.	The plan does not refer to other relevant EU initiatives, such as the EU Child guarantee, or the EU anti-racism action plan for example.
FUNDING CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	Funding connections are made with EU programmes such as ESF Operational Programme for 2014-2020, ESF Operational Programme for 2021-2027, “Rights, Equality and Citizenship” Programme, Cohesion Policy Programme 2021-2027 and “Creative Europe” Programme.	

	OTHER SOURCES OF FUNDING	The plan clearly details the funding amount allocated to measures from the State and local governments planned in the Medium-Term budgetary framework law. Additional required funding may be made available during the implementation. Some measures are also funded by the grant programme “Active Citizens Fund” of the European Economic Area and Norway.	With regard to health measures, no precise budget allocation is indicated.
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PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

The Latvian Roma Platform, which has been meeting regularly since 2012 and contributes to monitoring and reviewing the implementation of the national strategy and relevant policies, as well as to the development of new measures, can be highlighted as a positive example of a national dialogue process.

The project “Support for the Reduction of Early School Leaving” (PuMPuRS) includes engaging with parents in order to reduce early school leaving of Roma pupils.

Within the framework of the project “PROTI UN DARI!”, based on the individual needs of each young person, a set of measures has been implemented increasing the motivation and interest of young people to return to education or the labour market. Young NEET Roma have opportunities to receive support within the project. Roma mediators are encouraging young NEET Roma to take advantage of support opportunities within the project.

RCC will organise the measure within the framework of the financing for projects supported by the European Union Programme „Creative Europe”, the programme „Citizens, Equality, Rights and Values”, the targeted programme „Development Programme of the Field of Museums” of the State Culture Capital Foundation, „Active Citizens Fund” or other programmes. [1] RCC will organise the measure within the framework of the financing for projects supported by the European Union Programme „Creative Europe”, the programme „Citizens, Equality, Rights and Values”, the targeted programme „Development Programme of the Field of Museums” of the State Culture Capital Foundation, „Active Citizens Fund” or other programmes.

LITHUANIA

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	Integration of the Roma into Lithuanian society Action Plan 2022-2023
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 3,000; 0.09% of total population National data available: 2251
National Roma Contact Point (NRCP)	Department of National Minorities under the Government of the Republic of Lithuania

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
Within the Department of National Minorities, one part-time chief expert carries out the task of NRCP. The NRCP monitors the implementation of national policies for Roma equality, inclusion and participation, and coordinates with line ministries on measures of relevance for Roma inclusion. It also applies for the dedicated Citizens and Equality Rights and Values (CERV) fund to develop the National Roma Platform. Three mediators are employed in that framework. The NRCP organises meetings with Roma civil society organisations and public institutions working with Roma and allocates partial funding for events related to the implementation of Roma related measures. The measures of the action plan are monitored by a permanent inter-institutional working group set up by order of the Director of the Department of National Minorities. The inter-institutional working group meets at least once a year to examine the state of implementation of the measures of the action plan, assess achievements and, if necessary, make proposals for the adjustment of the action plan.	

HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
While the word “antigypsyism” is not used in the action plan, specific discrimination against Roma is acknowledged as a persistent problem, as well as underreporting of discrimination incidents. In order to reduce discrimination, the Action Plan proposes generic measures such as organising training and educational events for employers on equal opportunities, on reducing racial inequalities and hatred, and promoting non-discrimination in the labour market. The Action Plan also provides for a measure to clarify the provisions of the criminal law relating to criminal liability for hate speech; the regulation of hate crime, list of hate crimes by adding “skin colour” and “ethnic” criteria, as well as a measure to develop the competences of police mentors and officers to prevent hate crimes and respond appropriately to them when they occur. The Action Plan sets a national target responding to the EU-level target included in the EU Roma Framework (cut the proportion of Roma with discrimination experience by at least half).	Whilst anti-Roma sentiments within the Lithuanian population are mentioned in the narrative presenting the Action Plan, no specific reference to antigypsyism is made in the Action Plan. The actions proposed focus on combatting discrimination.
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The Action Plan proposes measures to support initiatives to commemorate Roma Genocide Remembrance Day, as well as cultural education projects that raise public awareness of the Lithuanian Roma genocide. Measures are also proposed to include in school curricula information on Roma history and culture, as well as Roma genocide. Furthermore, the Action Plan proposes information and awareness raising activities, conferences, trainings for people working with the Roma community to familiarise themselves with Roma history, culture and traditions, and the financing of projects presenting Roma	

culture in the media, through a call for tenders. Qualitative targets on intercultural dialogue are defined in the Action Plan.	
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
Social inclusion measures are proposed in relation to the sectoral objectives, in particular as regards employment, social services, housing and access to essential services.	This objective is not addressed as a stand-alone section in the Action Plan
3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
Six Roma organisations are currently active in Lithuania. The Roma minority has its own representative in the National Communities Council, which operates under the Department of National Minorities attached to the Government of the Republic of Lithuania and represents national minorities on the coordination of Lithuanian national minority policies. The Action Plan proposes to promote the active participation of Roma in decision-making processes, strengthen their leadership by promoting social, economic and cultural participation, especially of Roma women and young people. A qualitative target on empowerment of the Roma community is defined in the Annex to the Action Plan responding to the EU-level targets included in the EU Roma Framework (encourage participation of Roma in political life at local, regional, national and EU levels).	

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	Under this objective the Action Plan proposes to assist educational institutions in charge of pre-primary, primary and general education to adequately organise the education of Roma pupils with diverse educational needs, and to improve the competences of teachers and other people involved in education to work with different groups of students/Roma with special educational needs, starting at an early age. Qualitative targets on Roma participation in education and civic attitudes of children and young people and participation in non-formal education activities are defined in the Action Plan by measures such as developing and improving pre-school, pre-primary and general education for Roma children, and promoting vocational and higher education and improving adult Roma education.	The measures proposed under this objective remain rather vague and could be substantiated with more concrete actions.
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	Under this objective the Action Plan proposes to organise information-communication events for Roma communities on the entrepreneurship promotion measures implemented by the Innovation Agency, increase the motivation of Roma to take up employment or training by providing counselling services to assist them in career choices or career planning, also by taking into account personal characteristics and labour market needs, advise on job transitions, and assist in updating/creating CVs. The Action Plan mentions employment services to persons with disabilities in order to provide them with individual job assistance	The Action Plan acknowledges the direct link between residence and employment in the labour market, as employment promotion programmes are not in place in all municipalities, yet the Action Plan does not specify how these regional disparities will be addressed.

	and/or establishment at the workplace. It proposes to implement active labour market policies (ALMPs) to promote Roma employment and provide psychologist services. National qualitative targets are proposed.	
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	The Action Plan proposes to organise activities in Roma communities on the prevention of communicable diseases, to increase vaccination coverage. Access to healthcare is ensured through mainstream measures for vulnerable people and communities. A qualitative target on Roma awareness of access to health services is defined in the Annex to the Action Plan.	The Plan could have set measures to ensure that Roma people are not discriminated against in access to healthcare.
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	In Lithuania, all the persons and families are entitled to rent social housing in accordance with the requirements established by the Law on Social Housing, having submitted an application to the municipal administration In the Plan, access to housing is indirectly referred to under an employment measure aiming at providing counselling to raise awareness among Roma, especially young people, about existing employment, social services and other social protection measures, thus ensuring Roma's ability to find employment, decent housing and basic services.	The Plan could have detailed which mechanisms are in place to ensure that Roma are not discriminated against to access social housing on equal footing with the general population.

MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	The measures of the Action Plan were developed on the basis of a study by the Diversity Development Group VšĮ entitled ‘The situation of Roma people in 2020’ and taking into account consultations with public administrations, non-governmental organisations representing the Roma and Roma minority. The Action Plan provides for carrying out an analysis of the census data on the situation of Roma in Lithuania.	Baselines could be included to allow measuring progress towards EU level targets.
TARGETS	The Action Plan uses national quantitative targets, although not for all objectives.	Targets could be defined more closely in line with EU level objectives and targets.
INDICATORS	Indicators are in place to assess the number of events, trainings organised.	Indicators could be defined closely in line with EU level objectives and targets.

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	The inter-institutional working group is composed of representatives of public authorities implementing the action plan measures, Roma representatives and representatives of organisations working with Roma.	Whilst the Action Plan acknowledges in its background analysis the underreporting by Roma of hate crime and discrimination, there is no mention of the equality body. It would be advisable for the NRCP to coordinate actions with the equality body and local authorities to ensure prompt and effective reporting by Roma of discrimination incidents affecting them.
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS	The NRSFs introduces the mainstream measures that Roma can benefit from, in the areas of discrimination, employment, education and health. Diversity considerations are taken into account in the Action Plan through its focus on Roma youth and women, as well as mainstream measures for disabled people.	No housing or targeted measure concerning Roma is explained in the Action Plan. The connection with other relevant EU initiatives is not mentioned.

FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	EU financing is mentioned for measures without any specification of the type of funds. The Citizens, Equality, Rights and Values (CERV) programme supports the National Platform.	
	OTHER SOURCES OF FUNDING	State budget will finance the measures of the Action Plan (Annex I).	

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

The Action Plan proposes a measure to carry out an analysis of the census data on the situation of Roma in Lithuania. This measure could provide a very useful baseline and allow for well-targeted next NRSF.

The Action Plan proposes to promote the active participation of Roma in decision-making processes, strengthen their leadership by promoting social, economic and cultural participation, especially of Roma women and young people.

LUXEMBOURG

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	National Plan for Integration Strategy 2018-2023, following a generalist approach targeting all populations without distinction by ethnic origin
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 300; 0.06% of total population
National Roma Contact Point (NRCP)	Integration Department, Ministry of Family Affairs, Integration and the Greater Region

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
Given the demographic context, Luxembourg does not have a specific NRCP and the Integration Department is responsible for all of the equality and inclusion policies. This Department has the adequate mandate and institutional authority to implement the equality policies and cooperate with EU authorities regarding the management of EU funding.	The Integration Department could ensure a legal framework for the collection of relevant equality data.

HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
The Plan, in its broad approach, aims to improve the integration of asylum seekers and non-Luxembourgish residents. It promotes inter-cultural exchanges and diversity initiatives through calls for projects and dissemination campaigns promoting the benefits of inter-cultural exchanges.	The results of an ongoing study on racism will be particularly useful to develop and implement new targeted measures in this area. There is no specific measure to fight hate crime and hate speech against any minorities.
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
This objective is not applicable due to the demographic context.	
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
In order to fight exclusion, the plan provides for a set of communication and dissemination measures, translated into different languages. It also provides for support to local NGOs working with minorities.	The Plan does not include measures to combat poverty.
3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
The plan wants to enhance political participation of the non-Luxembourgish by raising awareness of young people about politics and by facilitating access to Luxembourgish citizenship.	The capacity building and cooperation is mainly carried out by local authorities and administrations. It does not involve the civil society.

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	The ongoing plan aims to “promote lifelong learning education and language learning for non-Luxembourgish nationals”. Measures include the development of schooling, language training courses, training of teachers regarding diversity and inclusion matters, and increase of funding for extra-curricular activities.	The Plan could focus more on early childhood education and care and early school leaving is needed.

5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	One of the 5 priority areas of the plan is “strengthening the employability of non-Luxembourgish nationals”, with measures to prevent unemployment and encourage professional training to promote non-Luxembourgish entrepreneurship or to create partnerships with the private sector and mentoring programmes.	The plan does not include targeted measures for women and young people.
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES		This objective is not covered by the Plan.
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES		This objective is not covered by the Plan.

MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	There are no quantitative baselines to allow measuring progress towards EU headline targets.	
TARGETS	There are no quantitative and qualitative targets defined, in line with EU objectives and associated EU headline targets.	
INDICATORS	There are no quantitative and qualitative indicators defined, in line with EU objectives and associated EU headline targets.	

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	Cooperation and coordination with local authorities is one of the 3 transversal axes of the plan. Measures include strengthening the role, mandate and missions of the Interministerial Committee for Integration to organise annual meetings with every stakeholders, to encourage sharing of good practices of efficient implementation. The Interministerial Committee for Integration, which monitors the implementation, is opened to 5 CSOs representing ethnic and racial minorities. The review of the strategy included the OECD, the equality body and a great number of municipalities	The engagement with Roma civil society could be further improved. The implementation process could seek more cooperation with civil society.
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS	This objective is not relevant due to the demographic context	
FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	There is no budget provision in the Plan. Further use of existing possibilities under the EU funds to support minorities' inclusion should be considered.
	OTHER SOURCES OF FUNDING	There is no budget provision in the Plan.

THE NETHERLANDS

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	Policy measures in the Netherlands for the equality, inclusion, and participation of Roma and Sinti. Integrated set of generic and specific policy measures. Ongoing until possible revision by current new Government.
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 40,000; 0.24% of total population No official national data available
National Roma Contact Point (NRCP)	Ministry of Social Affairs and Employment

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
Within the Ministry of Social Affairs and Employment, one member of staff carries out the task of NRCP, and coordinates on a regular basis with other departments to share knowledge on how to increase inclusion and equality of Roma and Sinti. The NRCP facilitates the engagement of Roma civil society by way of a dialogue with representatives of the Roma and Sinti communities and the various ministries, which takes place twice a year in the form of a pilot. The NRCP reports in the Social inclusion qualitative monitor every second year on social inclusion of Roma and Sinti in the areas of education, employment, health, housing, safety, freedom of choice, contact with the local government, and experiences and perceptions of discrimination.	As the document acknowledges some difficulties in involving the Roma and Sinti community, the establishment of a National Roma Platform could help mobilise and coordinate efforts. Such platforms are continuously supported by the Commission through a dedicated Citizens, Equality, Rights and Values (CERV) grants programme.

HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
Efforts to counter antigypsyism form part of the wide national strategy against discrimination and racism. A guideline is currently being drawn up to help municipal authorities with preventing and countering antigypsyism. Representatives of Roma and Sinti communities have been involved with the drafting of this guideline. Plans are made to reach-out and engage with equality bodies with respect to their role in supporting victims of discrimination. The set of measures mentions the adoption of the National anti-racism action plan (NAPAR) being drawn up with the involvement of relevant actors, including representatives of Roma and Sinti communities, and the subsequent nomination of the anti-racism coordinator. The NAPAR has been published, and the coordinator is now in place. The office of the national coordinator against discrimination and racism is planned to be provided with one staff member whose main task will be the fight against antigypsyism.	While discrimination of Roma in Netherlands is reported as high, the established measures in this area are too generic. More targeted measures to combat antigypsyism and discrimination against Roma could be developed. The national Ombudsman and anti-discrimination services, as well as national Institute for Human Rights are referred to in the set of measures, but their role in supporting Roma victims of racism and discrimination could be highlighted.
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The policy document mentions Remembrance. In 2021 the National Memorial Center Camp Westerbork has opened a digital exhibition on the memories of the war by Sinti and Roma victims. Since 2021 there is also a Holocaust remembrance monument in Amsterdam with the names of victims, amongst them 220 being Sinti and Roma. The set of measures mentions results of FRA surveys, but not in the context of using and establishing baselines, targets and indicators.	Currently no measures are provided to promote awareness of Sinti and Roma culture, language and history, other than the Roma holocaust, or to foster positive narratives about Roma. No funding is indicated for this objective.

2. REDUCE POVERTY AND SOCIAL EXCLUSION

KEY FEATURES	AREAS FOR IMPROVEMENT
Besides mainstream anti-poverty policies and specifically for children, the Child Poverty Ambitions programme, the Netherlands also have in place a specific participation and emancipation subsidy scheme to fund projects and activities that, directly or indirectly, contribute to improving the social inclusion of Roma and Sinti. This fund was created in recognition of observed shortcomings in the post-war restoration of rights, an instrument to remedy past injustice by way of provision of subsidies established by law. Roma and Sinti can apply for funding in the fields of respect for their culture and identity, combatting discrimination and prejudice, promotion of interests and representation, increasing access to education. Roma and Sinti can also apply for a student grant.	There's no specific indication of how many people could avail of the remedy subsidy scheme, and whether it will be prolonged or renewed. In terms of national anti-poverty policies, there is no indication of how effectively they reach the Roma population in the Netherlands. The set of measures mentions results of FRA surveys, but not in the context of using and establishing baselines, targets and indicators.

3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST

KEY FEATURES	AREAS FOR IMPROVEMENT
A specific participation and emancipation subsidy scheme to fund projects and activities that, directly or indirectly, contribute to improving the social inclusion of Roma and Sinti is in place in the Netherlands. It guarantees the involvement of the Roma and Sinti as part of the dialogue process which takes place twice a year, currently as a pilot. The scheme itself is the result of intensive consultation with the Sinti and Roma communities. In addition, an advisory committee comprised of Sinti and Roma has been set up to help the Ministry of Health, Welfare and Sport with its assessment of applications.	No details are provided as part of the planned measures on the scope of the subsidy scheme and how many Roma and Sinti people benefit from it. The set of measures mentions results of FRA surveys, but not in the context of using and establishing baselines, targets and indicators. The policy document could have addressed more specifically the aspect of trust, by establishing measures to promote mutual understanding, respect and trust.

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	Under this objective, the set of measures mentions the subsidies (EUR 1 million /year) which are provided to support schools with at least four Roma children, to integrate them. The government supports the Education Support to Traveller, Roma, and Sinti Children (Onderwijs aan Woonwagen, Roma, en Sintikinderen - OWRS) project. The OWRS is a national platform that connects travellers, Roma and Sinti, and promotes the education of these groups and cultures. Schools in need of support can approach the OWRS.	The success of the proposed measures is difficult to assess in absence of baseline, indicators, and targets.
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	The Netherlands adopted in 2018 the “2018-2021 Labour Market Discrimination Action Plan” followed by two bills to counter discrimination in the labour market. They envisage using insights obtained from the “Nudging in Recruitment and Selection” pilot of a comprehensive investigation programme to counter discrimination of Roma and Sinti in the labour market.	According to the latest Social inclusion qualitative monitor (from 2019) the level of Roma and Sinti participation and their social inclusion is still very low. They experience high level of stigmatisation, social exclusion and discrimination. However, given the fact that there are no baselines and targets established, it will be difficult to measure progress and success of actions taken in this area.
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	Standard generic healthcare measures are mentioned in the set of policy measures, such as the Healthcare Insurance Act, and the Long-Term Care Act for disabled or chronically-ill people. Theoretically, Roma people have access to those services and social covers.	There is scarce detailing on specific assistance to people in need and on prevention measures. While the policy document acknowledges that some Roma and Sinti people struggle to have healthcare insurance, no action is mentioned as to how to remedy this problem. Measures proposed by the Council Recommendation are not included in the policy document, nor any indicator or target are established.

7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	The measures in place in the Netherlands under the housing policies include a social housing market provided for people with low income on a non-discriminatory basis, accompanied with the more targeted 2018 municipal pitch policy framework for travellers, following the Ombudsman's "human rights for travellers" investigative study. The framework provides municipalities with guidelines for developing a local pitch policy in line with human rights (protecting travellers against discrimination and offering legal certainty and clarity).	The policy document could be better developed to improve the contact and communication between Roma and Sinti communities and the (local) government with regard to housing-related rights and services. A total of EUR 50 million was made available in 2021 for housing of priority groups by municipalities. However, the extent to which this has been or will be targeted at Roma and Sinti, for instance through the set-up of pitches, is currently unknown. No baseline and targets are defined. The single indicator used is the assessment of caravan pitches.
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MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	The Netherlands does not register persons on the basis of their ethnicity, resulting in impediments to (quantitative) monitoring methods. However, since 2013, the level of social inclusion of Roma and Sinti is investigated every other year. Various qualitative methods are used to get a good understanding of the situation and prospects with respect to the housing and living conditions of Roma and Sinti. The results of the Social Inclusion qualitative monitor are submitted to the House of Representatives. In addition, the situation of pitches is mapped and investigated every two years.	No baselines and targets are used for the measures proposed in the policy document, except to some extent in respect of housing, where a needs assessment has been carried out with guidelines provided by the Ombudsman and the Netherlands Institute for Human Rights study on pitches for travellers. Baselines could be included to allow measuring progress towards EU level targets.
TARGETS	The proposed measures do not mention targets in general. There are some generic measures/process indicators listed, but these are not linked with any explicit national indicators or targets.	In line with the minimum commitments, targets could be defined based on a comprehensive needs-assessment.
INDICATORS	Some process indicators are used in the set of policy measures. No indicators have been developed to monitor progress.	Indicators could be defined more closely in line with EU level objectives and targets.

OTHER ELEMENTS			
		KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)		The consultation process with stakeholders takes place essentially through the dialogue established as a pilot, which aims at exchanging and giving feedback. The pilot is due to be assessed in 2022, at which time it will be decided whether the current system will be continued and, if so, how and in what format.	Consultation and involvement of Roma civil society is still challenging owing to a lower level of self-organisation and mobilisation of the Sinti and Roma communities. Measures should be taken to increase the capacity of civil society organisations.
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS		The policy document mostly presents sectoral mainstream measures. It mentions the creation of the position of a National Coordinator against Discrimination and Racism and a National committee against discrimination and racism.	Globally, throughout the mainstream sectoral policies, antigypsyism and discrimination issues are not enough identified and addressed as a barrier depriving Roma of access to those policies and services.
FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	There is no mention of EU funding in the Policy document	The use of existing possibilities under the EU funds to support minorities' inclusion should be considered.
	OTHER SOURCES OF FUNDING	National resources are used to implement some specific Roma and Sinti targeted measures, such as: Special scheme for primary education schoolboard (EUR 1 million /year) to subsidise schools with at least 4 Roma pupils; Participation and emancipation subsidy scheme for Roma and Sinti; Municipal pitch policy framework for travellers, in the context of human right framework (EUR 50 million made available by the National Government in 2021 for housing priority groups, including for Roma and Sinti).	It is unclear whether those funds are sufficient, in particular to fight against antigypsyism and discrimination, and to improve social inclusion of Roma and Sinti.

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

The adoption by the Minister of the Interior and Kingdom Relations of the recommendations issued by the National Ombudsman in its investigative report “Traveller is looking for pitch: An investigation into the reliability of the government for travellers”, and the subsequent submission of the Policy framework on municipal pitch policy to the House of Representatives is a noteworthy practice allowing to provide municipalities with guidelines for developing pitches for travellers within the context of the human rights framework. It focuses on protecting travellers against discrimination, and on preserving their cultural identity. This policy framework also allows to map and monitor the number of pitches.

Another noteworthy practice is the special scheme for primary education school board, allowing them to apply for subsidies if their school is attended by at least 4 pupils of a Roma or Sinti background. The objective of the scheme is for schools to be able to provide additional support to Roma and Sinti children. About €1 million in subsidies is applied for each year.

POLAND

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	The Programme for Social and Civic Integration of the Roma Community in Poland for 2021-2030 - Strategy
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012) : 32,500; 0.09% of total population National census (2002): 12,731
National Roma Contact Point (NRCP)	Ministry of Interior and Administration

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
NRCP is placed in Department of Religious Denominations and National and Ethnic Minorities in the Ministry of Interior and Administration – the one responsible for policy towards national and ethnic minorities. The NRCP has the staff capacity of 1 person. Coordination with other relevant ministries and state agencies goes through regular meetings (4 per year) of the Joint Commission of Government and National and Ethnic Minorities. Monitoring of the past and current national strategies is split between the NRCP and the Plenipotentiaries of the Voivode on National and Ethnic Minorities. Monitoring is also made by the Highest Chamber of Control. The Parliamentary Commission on National and Ethnic Minorities of the Polish Lower Chamber plays also an	The NRCP needs to be better equipped in terms of human resources but also a stronger mandate needed for inter-ministerial coordination and in terms of cooperation with local and regional authorities.

important role in the new Strategy.	
Roma Civil Society was involved in the design of the Strategy, and they are involved in its implementation via a series of projects.	

HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes educational measures targeted at officers by the National Police Headquarters under the policy of raising awareness on human rights protection and non-discrimination against members of the Roma community as well as monitoring information concerning hate crimes and the number of convictions for hate crimes perpetrated against people from the Roma community. The NRSF includes a section on Roma women and girls, in which the intersection discrimination is acknowledged.	The measures mentioned are rather vague and indirect and mostly focus on civic awareness, as specified below. There are no specific measures for combatting multiple discrimination, or harassment, violence, or victim support. Antigypsyism is not acknowledged nor mentioned. The NRSF does not include this horizontal objective as a separate area of intervention. There are no indicators related to this horizontal objective in the NRSF.
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes measures such as setting up post-graduate studies for Roma history and culture, history education (history of own family, preparation of materials and teaching about the Roma Holocaust, tasks related to identification of unknown burial sites of Roma casualties of World War II, commemoration of the Roma Holocaust, etc.). At the central level, Roma culture is supported in two ways: through grants from the Ministry of the Interior and Administration and the Ministry of Culture, National Heritage and Sport.	The aspect of stereotypes is approached in a limited manner, only through a postgraduate course. Promotion of positive narratives about Roma and Roma role models are not specifically mentioned. It is important to promote positive narratives about Roma and Roma role models in mainstream society to better understand the challenges that Roma face and to inspire Roma youth. The NRSF does not include any objectives or indicators related to this horizontal objective. There are no specific measures concerning the Romani language and the teaching of Roma history and culture in schools.

2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF refers to the National Programme for Social Economy Development until 2023 (Social Solidarity Economy), which has as a main objective to make social and solidarity economy entities an important element of activation and social integration of people at risk of social exclusion and public service providers and bodies implementing tasks in the field of local development etc.	The NRSF does not include this horizontal objective as a separate area of intervention. There are no objectives or indicators related to this horizontal objective in the NRSF.
3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF provides for participation through access of the Roma population to social services, participating in consultation forums, including in the decision-making processes etc.	The NRSF does not include this horizontal objective as a separate area of intervention. There are no objectives or indicators related to this horizontal objective in the NRSF.

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	The NRSF has a specific objective on access to education for Roma, which is broadly defined in the Integration Programme for 2021–2030 and includes, aside from supporting the formal education of Roma children and youth, their informal education as well. Educational measures are also aimed at adult Roma, as part of lifelong learning.	The NRSF does not include any indicators from the EU portfolio of indicators. It could set targets more closely aligned with the EU level headline targets. The NRSF includes few indicators with the baselines and targets – but these are indicators (output) which help monitor the process more than the result of the process.
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	The NRSF refers to possible projects in the area of employment such as employment of community mediators, employment of the Roma (or people from Roma backgrounds) by social cooperatives, mediation, ‘work in exchange for payment of rent debt’ projects, etc.	While the NRSF refers to the need to systematically support Roma in their access to the labour market, based on previous data and evaluations, the NRSF does not propose a thorough and targeted approach to tackle this aspect. The NRSF does not include this horizontal objective as a separate area of intervention. There are no objectives or indicators related to this horizontal objective in the NRSF.
6. IMPROVE ROMA HEALTH AND	The NRSF refers to access to mainstream healthcare services	The NRSF doesn’t contain a specific priority or set of measures concerning

EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	which can be accessible by all Polish citizens, including Roma. Some measures include health education (vaccinations for Roma pupils, prevention programmes aimed at Roma pupils and parents, including addiction prevention, promotion of a healthy lifestyle, healthy nutrition, ecology, sports activities, etc.).	the health sector. The post-2023 NRSF should address the area of health policy and set out measures to improve the health situation of Roma people and ensure their effective equal access to healthcare where necessary, based on a sound assessment of health needs, including of particular groups within the Roma population, in particular women and children, supported by sufficient data.
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	The NRSF refers to a complex situation in making housing available for Roma population. It is therefore indicated that the availability of housing, methods and terms for regulating ownership issues are left to local authorities. The NRSF refers to the possibility of encouraging LGUs to plan measures aimed at the community and local development in a more strategic manner.	The NRSF does not include sufficient measures to ensure effective equal access of Roma to housing. The focus is primarily on supporting Roma living in situations posing risks to their life or health. The NRSF should address the area of housing and set out measures to ensure effective equal access of Roma to housing where necessary, based on a sound needs assessment. The NRSF does not include targets corresponding to the EU level headline targets. The NRSF includes one output indicator with a baseline and target, although it monitors the process rather than the outcome.

MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	The NRSF includes some baselines.	The NRSF, baselines could be defined closely in line with EU level objectives and targets.
TARGETS	The NRSF sets some annual targets and overall targets for 2030.	Targets could be defined more closely in line with EU level objectives and targets.
INDICATORS	The NRSF includes some national indicators.	The NRSF does not include indicators from the EU portfolio of indicators. It includes few national indicators with baselines and targets, mainly focusing on outputs and monitoring of the process (e.g. number of Roma pupils applying for scholarships at secondary school level). Indicators could be defined closely in line with EU level objectives and targets, building on the EU portfolio of indicators.

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	There is a stable contact and constant exchange on the implementation of the strategy with Roma NGOs. Every year Roma representatives have the possibility to be members of regional commissions of the assessments of projects submitted within the national strategy. The national strategy imposes two new duties on Plenipotentiaries of the Voivode on National and Ethnic Minorities: regular meetings/trainings (twice a year) with Roma school assistants (mediators) and regular meetings (twice a year) with local authorities, taking part in national strategy.	The NRCP could centralise the dialogue with all relevant stakeholders through conveying a regular National Roma Platform. There are no references regarding the cooperation with the Equality Body.

MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS		The NRSF refers to various universal services that are accessible to all citizens including Roma.	The NRSF could be better aligned in complementary with other EU relevant strategies and initiatives.
FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	The NRSF refers to ESF+ funds, to be used in a complementary manner to the measures of the Integration Programme for 2020-2030 with regard to integration, active participation, and promotion of equal opportunities and socio-economic and professional activation of excluded persons or persons at risk of social exclusion, including the Roma.	The NRSF could have included a clearer picture of budget allocations for the measures foreseen under the NRSF.
	OTHER SOURCES OF FUNDING	The NRSF specifies the state budget as a main source of funding for the foreseen measures. The funds are to be obtained from the special-purpose reserve of the State budget (part 83 of the State budget) which is at the disposal of the minister competent for religious denominations and national and ethnic minorities.	

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

The 2019 evaluation of the effectiveness of programmes targeting the Roma (with a particular focus on Measure 2.7 of the OP KED35) and the evaluation of Integration Programme for 2014–2020, which can stand as a good basis for the future formulation of the Roma-related interventions.

In the area of education, the government highlights the practice of Roma school mediators (RSM) as one of the most effective instruments in bringing about a change in the approach of Roma to the institution of schooling and formal education, with notable results at primary school level. Of the 89 mediators employed in the 2019/2020 school year, 72 were employed in schools on the basis of permanent employment contracts, while 17 on fixed-term employment contracts. 74% of the RSMs are Roma women. The present strategy plans to provide incentives for Local Government Unit (LGU) to further increase the number of Roma school mediators employed in places where the number of pupils is relatively high (mainly in large cities). To support access of Roma to education, the Ministry of the Interior and Administration is implementing yearly a number of scholarship programmes for Roma pupils and students in secondary and tertiary education.

PORTUGAL

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	National Roma Communities Integration Strategy (NRSF) Strategy 2013-2022 (revised strategy in 2018)
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 52,000; 0.5% of total population National census estimate (2014): 40,000-60,000; 0.4% - 0.6% of total population
National Roma Contact Point (NRCP)	High Commission for Immigration and Intercultural Dialogue /High Commission for Migration (NRCP)

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
The NRCP is given mandate, resources and staff to ensure ongoing coordination and monitoring and presenting a regular progress report.	The NRSF could be more explicit regarding the NRCP mandate and resources, indicating whether it is strong and sufficient enough to ensure proper coordination with line ministries, regional and local authorities, as well as with the Roma and pro-Roma civil society.

HORIZONTAL OBJECTIVES

1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION

1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA

KEY FEATURES	AREAS FOR IMPROVEMENT
This objective is partially addressing discrimination against Roma through measures such as raising awareness on stereotypes and the fight against discrimination with the involvement of Roma people, strengthening the anti-discrimination instruments and promoting literacy on rights and protection against discrimination for Roma people.	The NRSF does not include this specific objective, although it is addressed to some extent through a number of measures addressing discrimination, though lacking specific measures for preventing and fighting antigypsyism. The upcoming NRSF should establish this specific objective and include relevant measures as proposed by the Council Recommendation.

1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION

KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF promotes raising awareness about the benefits of interculturalism, of Roma history and culture, including training of national and local civil servants involved in inclusion policies.	The NRSF does not include this specific objective so the upcoming NRSF could include relevant measures promoting Roma history, culture, recognition and reconciliation as proposed by the Council Recommendation. Promotion of positive narratives about Roma and Roma role models are not specifically mentioned. It is important to promote positive narratives about Roma and Roma role models in mainstream society to better understand the challenges that Roma face and to inspire Roma youth.

2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
This specific objective is partially addressed through measures under the sectoral areas.	The NRSF does not include this specific objective as such. The NRSF could include relevant measures to reduce poverty and social exclusion as proposed by the Council Recommendation.
3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF's guiding principles in this area aims to ensure meaningful cooperation and participation cross-cutting in each policy area, through measures promoting civic, political, cultural and associative participation of Roma and promotion of Roma association. Several measures are directly targeting Roma women and girls' participation.	Measures concerning stronger capacity building and leadership of the Roma civil society and their involvement in decision making processes, employment of Roma in private and public institutions are not sufficiently elaborated in the current NRSF. In this regard, the incoming NRSF could include more specific measures to further strengthen the National Roma Platform and empower the Roma civil society.

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	The NRSF includes specific objectives such as promoting and strengthening the capacity of cluster and non-cluster schools for the integration and educational success of Roma children and young people in primary and secondary education; promoting the integration and success of Roma students in higher education; strengthening the basic skills of illiterate Roma men and women; and training social security and child protection workers.	A more comprehensive approach for this sectoral objective should be planned in the upcoming NRSF, including measures, targets and indicators that are in line with the EU Roma Framework. Further, it should also specifically address the issue of segregation in education and the access to early childhood education and care.
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	The NRSF includes specific objectives aimed at guaranteeing the access of Roma to employment and self-employment and raising awareness among employers for the employment of Roma people. It includes measures such as improving formal qualifications of Roma people, promoting increased	The upcoming NRSF should include a more comprehensive approach for this sectoral objective addressing also discriminatory practices of potential employers, and any other barriers precluding integration of Roma people in the labour market.

	enrolment in training centres and integration of unemployed Roma people and/or those looking for their first job into labour market.	
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	Under this objective, the NRSF includes measures promoting the access of Roma people to health services and training health-care professionals in primary and hospital care.	The upcoming NRSF should include a more comprehensive approach for this sectoral objective to ensure equal access to mainstream services, considering specific needs of women and children and to include investment in Roma health professionals (nurses, general practitioners, etc.).
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATE D HOUSING AND ESSENTIAL SERVICES	The NRSF includes a specific objective concerning improvement of the housing conditions of Roma people and families, and elimination of spatial segregation. It consists of measures such as implementation of the First Right Programme supporting the right to housing, including schemes for social housing and neighbourhood infrastructure rehabilitation, as well as awareness-raising initiatives focused on landlords.	The upcoming NRSF should include a more comprehensive approach for this sectoral objective addressing also discriminatory practices of some landlords and concrete measures addressing the issue of spatial segregation.

MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE		There are no quantitative baselines to allow measuring progress towards EU headline targets.
TARGETS	The NRSF sets several qualitative and quantitative country specific indicators and targets.	The upcoming NRSF could set more targets and indicators that are in line with the EU headline targets and indicators.
INDICATORS	The NRSF includes output indicators that are close to the ones proposed by the EU portfolio of indicators.	The upcoming NRSF should also be more ambitious and establish outcome indicators, allowing to measures the results and progress of the proposed measures.

OTHER ELEMENTS			
		KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)		The NRSF review process was based on wide consultation with municipalities and other local public services, civil society entities at the national and local levels with a particular focus on associations representing Roma communities.	The upcoming NRSF could include specific measures to ensure involvement of and co-operation with equality bodies including as part of the work and proceedings of the National Roma Platform.
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS		The NRSF ensures synergies with national strategies and action plans regarding equality and non-discrimination, gender equality, combating violence against women and domestic violence, education, promotion of school success, right to housing and health.	
FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)		The EU funding provisions and plans should be indicated in the upcoming NRSF.
	OTHER SOURCES OF FUNDING		The other sources of funding should be indicated in the upcoming NRSF.

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING	
Promoting Roma access to health services and implementation of mechanisms to encourage access to and attendance at secondary school by young Roma are some of the promising practices.	

ROMANIA

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	Strategy of the Romanian Government of the Inclusion of the Romanian citizens belonging to the Roma minority for the period 2022 to 2027
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 1.85 million Roma; 8.32% of total population National census (2011): 621,573 In line with the EU Roma Framework's common but differentiated approach, this Member State was invited to make more ambitious commitments to Roma equality, inclusion and participation than other Member States
National Roma Contact Point (NRCP)	Ministry of Investments and European Projects

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes a monitoring and evaluation mechanism, coordinated at central level by the Interministerial Committee for the Implementation, Monitoring and Evaluation of the Strategy (CIIMES). The NRCP possesses sufficient resources, has staff capacity and potential to fulfil the coordination role with the line ministries, equality bodies and Roma civil society, however, their mandate does not include an explicit coordination role with the key stakeholders.	The coordination role of the NRCP and its mandate has been further reduced. Limited administrative capacities at national and regional level dealing with the social inclusion of marginalised Roma remain a major bottleneck, which poses limitations to implementation of policies and impacts on the capacity of reaching the targets set in the NRSF. In order to strengthen the mandate and institutional authority of the NRCP, there is a need for further revision of the task division between the coordination entities referred to in the strategy. Only one institution should be tasked centrally to oversee the implementation, monitoring and evaluation mechanism of the NRFS. The National Roma Platform, is still in an incipient phase of development and it requires better structuring, strengthening of its capacity to reach out to Roma civil society and to empower their members.

HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
Major legal development was achieved in Romania by the adoption in January 2021 of a law to prevent and combat antigypsyism. The strategy includes a specific objective on combatting discrimination and antigypsyism, covering hate speech and hate crime as well. The planned measures include monitoring the application of the provisions of the criminal legislation sanctioning the antigypsyism as well as racial hatred and hate crime. Further, it includes information and awareness raising campaigns measures, training courses for law enforcement officers, prosecutors and judges, educational package for public and private employers on preventing and combatting anti-Roma attitudes, with a focus on multiple, intersectional discrimination, etc.	While acknowledging a number of important legal developments, their implementation and outcomes benefiting the Roma remains to be seen. The NRSF does not include any measures targeting the vulnerability of Roma to trafficking in human beings. There is a need to further improve national indicators and targets for this objective in order to be able to measure progress towards the EU headline targets. The lack of a clear allocation of budget may affect the long-term sustainability of measures.
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF has a specific objective to support research, conservation and promotion of Roma cultural heritage and cultural identity. The measures include establishing diverse cultural centres, conservation and promotion of Romani language, awareness raising and events to promote traditional Roma crafts, review of educational curricula to include specific Roma history elements, training for teachers, fellowship programmes for Roma researchers, etc. The NRSF includes some qualitative and quantitative indicators for this objective.	In order to measure progress, there is need for better indicators and targets. Not all the measures under this objective have a budget allocation. Promotion of positive narratives about Roma and Roma role models could be more thoroughly addressed.

2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF has not established this horizontal objective, although it is covered in a cross-cutting manner through measures in the sectoral areas.	Measures included in NRSF towards improving living conditions for members of vulnerable communities with Roma population are rather general. There are no specific measures planned to address child poverty. No national targets and indicators are established under this objective, thus measuring progress will be difficult.
3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF does not include this horizontal objective, however some relevant measures can be identified in the sectoral areas.	The NRSF lacks a specific horizontal objective to address participation of Roma people. Additionally, despite some references to participation in the institutional setup, the strategy lacks concrete measures to promote the participation of young Roma people and women. Since participation measures are not clearly envisioned, this also prevents a clear budget allocation. The strategy does not define any targets regarding participation.

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	The NRSF specific objective “Ensuring access for Romanian Roma citizens to quality inclusive education”, includes measures focused on preventing and eliminating segregation, raising awareness among teachers about Roma history and culture, measures to include Roma children in early childhood education and care, prevent early school leaving and drop-out among Roma, supporting participation in non-formal learning and extracurricular activities.	The school mediation programme is one of the main interventions proposed by the NRSF. However, there is no methodology for assessing the impact that Roma school mediators have on children's education. There are no specific measures aimed at incentivising teachers working in schools with high proportion of Roma pupils, especially in remote /segregated or rural areas. Given the major increase of the segregation rate of Roma pupils in the educational system, the measures should be scaled up and ambitious enough to realistically tackle the persisting phenomenon of segregation. In complementarity with the NRSF, the future EU-Funded Programmes for 2021-2027 (and in particular the ESF+ Education and Employment Programme) should be used effectively to support Roma inclusion measures in this area. There is no clear budget allocation for the planned measures. Targets should be set to respond to the EU level targets included in the EU Framework for this objective.
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	The NRSF specific objective to “Increase the employment rate of Roma in line with market requirements in view of their professional development” include measures such as second chance education and training programmes, anti-discrimination campaigns for employers, integrated package of personalised services for inactive	The volume of the planned measures appears insufficient when taking into account the scale of unemployment. . Therefore, measures will need to be scaled up and properly budgeted, so that they contribute to the achievement of the EU targets. In complementarity with the NRSF, the future EU-Funded Programmes

	people in the labour market, developing and implementing social economy and entrepreneurship programmes in marginalised communities, with a focus on young Roma and Roma women. The Education and Employment Programme (EEOP) contains a mix of mainstream and targeted measures (including specific funding) for addressing the inclusion of Roma in sustainable employment policies. The NRSF includes a number of quantitative and qualitative indicators.	for 2021-2027 (and in particular the ESF+ Education and Employment Programme (EEOP)) should address some of these needs. Targets should be set to respond to the EU level targets included in the EU Framework for this objective.
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	The NRSF includes a specific objective “Improving the health status of members of vulnerable communities with Roma”. It contains several targeted measures to improve access to health services for Roma populations, even if they are not covered by national health insurance. It also aims to improve the information available in Roma communities on their rights to health services and their inclusion in national public health programmes and campaigns (e.g. on reproductive health, combatting violence and human trafficking). There are a few targeted measures for minors (e.g. ensuring access to health care for pregnant minors and improving vaccination rates among children). The NRSF includes some quantitative and qualitative indicators. In complementarity with the Recovery and Resilience Plan, the future EU-Funded Programmes for 2021-2027 (and in particular the multi fund ESF+ and ERDF Social	There are no specific measures proposed to address specific need of Roma people living with disabilities. Targets should be set to respond to the EU level targets included in the EU Framework for this objective.

	Inclusion and Dignity Programme) foresees integrated interventions in rural areas through the development of the community health care network and school counsellors, aimed at ensuring access to services for the rural population.	
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	The NRSF specific objective “Improving living conditions for members of vulnerable communities with Roma” includes measures focusing on the implementation of the national social housing programme, local projects to connect housing to utilities and ensure access to drinking water. Local Development Plans or Strategies are established to help identify and implement measures focusing on relocation of families located in areas of risk or risk of eviction, as well as implementation of local projects for rehabilitation of disaster-stricken dwellings. The measures include some quantitative and qualitative indicators.	The scope and scale of interventions in housing infrastructure appears to be insufficient, therefore the package of measures need to be scaled up in order to achieve meaningful impact. There are insufficient measures proposed to address spatial segregation in a concrete, ambitious and integrated manner. There are no concrete budgetary allocations. Targets should be set to respond to the EU level targets included in the EU Framework for this objective.

MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	No baselines are set towards the EU objectives.	Baselines could be included to allow measuring progress towards EU level targets.
TARGETS	Generally, the NRSF lacks targets towards the EU objectives.	The national targets do not reach the ambitiousness of the EU-level targets, which makes it unclear how the progress of measures and impact will be monitored and measured. National targets should be defined more closely towards the EU level objectives and targets, based on a comprehensive needs-assessment.
INDICATORS	The NRSF does not use the EU portfolio of indicators. It does not use any outcome indicators and/or quantified targets. The NRSF includes some indicators – output indicators only (qualitative and quantitative as well).	Indicators could be defined closely in line with EU level objectives and targets.

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	Due to some overlapping between the various institutions having similar roles concerning Roma-related initiatives, the coordination process is not clearly defined in the strategy. The NRSF plans to involve Roma experts at regional and local level in the implementation, monitoring and evaluation process by setting up Local Working Groups and Local Initiative Groups.	While the NRCP implements an EU-funded project to develop a platform for good practices for Roma, a National Roma Platform is still in the process of development and strengthening. The NRSF could have been clearer on measures aimed at enhancing dialogue and co-operation with the Roma civil society, as well as on measures to support capacity building of Roma organizations. The NRSF could have been more explicit on the plans to engage with equality bodies.
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES &	The NRSF refers to other relevant mainstream sectoral policies that have been adopted (or are in the process of adoption) for the successful implementation of the NRSF. The NRSF also refers to	The NRSF is lacking clear information on mainstreaming Roma equality and inclusion at regional and local levels as well as on how EU, national funds and other financial instruments, will be invested for inclusive mainstream policy reforms and targeted action.

DIVERSITY CONSIDERATIONS		relevant EU initiatives. The NRSF includes specific reference to Roma women and youth.	The NRSF does not include sufficient information of possible complementarity with mainstream health, education, housing or labour market policies/measures. While acknowledging the aspects of multiple discrimination, the NRSF does not include a solid set of measures to address the matter. Further, there are no indications of measures to address the challenges encountered by EU mobile Roma.
FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	The NRSF points out that “the Ministry of European Investments and Projects” has the possibility to highlight the interventions dedicated to Roma communities and vulnerable Roma people in broader interventions targeting vulnerable people, in line with the provisions of the regulations governing European funds and in line with the specific nature and purpose of each call for funding. NRSF indicates that European funds will be allocated to the measures of the strategy.	More information is available at the level of each Programme addressing these needs (including those selecting SO (j) from Article 4 of the ESF+ Regulation - “promoting the socio-economic integration of marginalised communities, such as Roma people”). The NRSF should provide in more detail how the implementation of its objectives will be supported by investments from EU funds. The NRSF could make a connection to the Romanian Recovery and Resilience Plan, given that this provides for support to vulnerable groups and marginalised communities.
	OTHER SOURCES OF FUNDING	According to the NRSF, the measures will be mainly funded from the state budget, however there are no concrete details currently. The NRSF indicates EU funding as complementary to state budget.	The NRSF does not provide enough information on budgetary allocations for the proposed measures.

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

On 15 December 2020 the Chamber of Deputies adopted the Antigypsyism (Anti-Tziganism) Law⁵. The law condemns the act of promoting, in public, in any way, ideas enforcing antigypsyism, conceptions or doctrines, the distribution or making public by any means of materials promoting antigypsyism, or producing, selling, disseminating or possessing with the purpose of further dissemination of symbols correlated with antigypsyism.

SLOVAKIA

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	Roma equality, inclusion and participation strategy up to 2030 (NRSF) Strategy 2021-2030; Action Plan 2022-2024
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 490,000; 9% of total population National census (2021): 156,164; 2.9% of total population In line with the EU Roma Framework's common but differentiated approach, this Member State was invited to make more ambitious commitments to Roma equality, inclusion and participation than other Member States.
National Roma Contact Point (NRCP)	Office of the Plenipotentiary of the Government of the Slovak republic for Roma Communities (NRCP)

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
The NRCP can count on a dedicated team and institutional mandate that ensures political weight, effective cross-sectoral coordination and mainstreaming of Roma equality and inclusion at regional and local levels; is involved (by EU fund managing authorities) in the coordination of cross-governmental discussions on the distribution of EU funds for Roma, and in systematic monitoring of their use.	Limited administrative capacities on a national and regional level dealing with social inclusion of marginalised Roma could pose limitations to implementation of policies. This could potentially have an impact on the capacity of reaching the targets set in the NRSF.

⁵ [Law 2 /2021](#) regarding measures to prevent and combat antigypsyism (antițigănistul)

HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
Global objective established for “Eliminating anti-Roma racism, promoting anti-discrimination and participation and increasing the protection of the most vulnerable groups and individuals” includes measures such as advocacy activities to support the definition of anti-Roma racism in the legal and administrative systems, awareness raising activities in the school environment and among civil servants and other stakeholders, media training or analysis of schoolbooks. The NRSF sets national targets responding to the EU level target included in the Framework (cut the proportion of Roma with discrimination experience by at least half; and decrease the proportion of general population who feel uncomfortable having Roma neighbours by at least a third). In addition to headline indicators, it uses secondary indicators from the EU portfolio of indicators as well.	Fighting and preventing antigypsyism is a long-term goal, hence it is crucial that the future Action plans build on the proposed measures and activities, which include sufficient budget.
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF covers this specific objective through different scientific, educational and research activities in the field of Roma language and realism, Roma culture and the arts, and specifically through the permanent Roma culture and history exposures in existing museums.	Promotion of positive narratives about Roma and Roma role models are not specifically mentioned in the Action plan.
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF does not include this horizontal objective, however some relevant measures can be found in the sectoral areas.	The NRSF does not include EU level targets or national targets for this objective. Also, headline or secondary indicators from the EU portfolio of indicators are not used.

3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF's objective "Strengthening Roma participation at all levels" include measures focusing on programmes and activities increasing Roma participation through advisory bodies, working groups, particularly of Roma youth and women. The NRSF sets national targets responding to the EU-level targets included in the EU Roma Framework (capacitate and engage at least 90 NGOs in EU wide coordinated Roma civil society monitoring; ensure participation of Roma NGOs as full members in national monitoring committees for all programmes addressing needs of Roma communities; double proportion of Roma who file a report when they experience discrimination; encourage participation of Roma in political life at local, regional, national and EU levels (in Member States with significant Roma population).	The NRSF should also boost the number of professional Roma in the mainstream public and private institutions, as a way to better reflect the constituency of the population, promote diversity in the policy making process and provide role models.

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	As part of the NRSF goal "Ensure equal access of Roma and Roma women to quality mainstream education from birth to labour market uptake by 2030, with an emphasis on implementing desegregation and inclusive measures in the education process at all levels of education", includes measures focused on early childhood development; provision of sufficient capacity of kindergartens; pedagogical, professional and auxiliary staff in teaching children from marginalised Roma communities; elimination of segregation, inclusiveness of schools and development of national identity and particularly language rights within the education system. The NRSF sets national targets	The NRSF has correctly identified the need for a systemic solution to the segregation of Roma pupils at all levels, but the listed desegregation measures do not address sufficiently the complexity of the issue, including segregated kindergartens, primary and secondary schools in the environment of excluded Roma localities. While the NRSF mentions development of new diagnostics methodologies it does not say if there are plans to establish a system of re-diagnosis of children who are enrolled in the special schools. The NRSF could provide more concrete measures for removing obstacles in participation of Roma children from remote areas in kindergartens (note the 95% target for marginalised Roma children in 2024),

	responding to the EU-level target included in the EU Roma Framework (cut gap in participation in early childhood education and care by at least half; reduce gap in upper secondary completion by at least one third; work towards eliminating segregation by cutting at least in half the proportion of Roma children attending segregated primary schools (in Member States with significant Roma population)).	as well as for increasing the level of employment of Roma-speaking teachers, mediators, school assistants. The NRSF could provide more ambitious measures to increase Roma men and women's social mobility in particular through the promotion of upper-secondary and tertiary education completion.
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	The NRSF goal to "Improve employment and increase employment of Roma, specifically marginalised Roma, by creating opportunities for labour market uptake" include measures focused on equal opportunities through increasing skills and practical experience for the transition from education to the labour market, improving quality and availability of public and non-public employment services and active labour market measures for marginalised Roma, along promoting the employment of marginalised Roma among employers and reducing discrimination and other manifestations of anti-Roma racism in the labour market. The NRSF sets national targets responding to the EU-level targets included in the EU Roma Framework (cut employment gap by at least half; cut gap in NEET rate by at least half; cut gender employment gap for Roma by at least half).	The NRSF could better ensure proportionate participation of Roma in mainstream active labour market policy measures, in particular upskilling measures, including training or mentored on-job subsidized job experience. The activation measures need to be reformed in order to provide practical support to Roma job seekers when transiting from unemployment to the labour market by learning new skills or upskilling. The involvement of non-public/private sector employment providers, including NGOs could be strengthened.

6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	The NRSF goal “Reduction of health inequalities (in all dimensions) between Roma, specifically the marginalised Roma communities, and the general population of the Slovak Republic” include measures focusing on gathering data concerning the health gaps between marginalised Roma and the general population, for the purpose of developing better health policies, promoting healthy lifestyles and disease prevention in marginalised settlements, along provision of equal access to healthcare. The NRSF sets national targets responding to the EU-level target included in the EU Roma Framework (cut life expectancy gap by at least half)although it looks at the gap between marginalised Roma communities (not entire Roma population) and general population.	Reduction of health inequalities (in all dimensions) among Roma, specifically the marginalised ones, and the general population cannot be achieved only through targeted measures such as health mediation and behaviours change. It requires systemic measures to ensure equal access to mainstream services and investment in Roma health professionals (nurses, general practitioners, etc.).
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	The NRSF’s goal “Eliminating inequalities between members of marginalised Roma communities and the majority population of Slovakia in housing and combatting discrimination against Roma in access to housing, including the elimination of residential segregation” includes measures focusing on reduction of the number of illegal /informal dwellings in marginalised Roma communities, improving access to /and use of basic technical infrastructure and civic amenities, improving the quality of housing and increasing housing security for Roma, including against forced eviction, reducing the residential segregation of Roma and discrimination against Roma in housing.	The NRSF could include measures for finalising land settlement processes in order to enable investments in infrastructure. The affordable rental housing schemes shall be established to accelerate and provide environment to significantly increase the investments in the upcoming period. It is also important to consider health risks related to the high number of illegal landfills presented at the segregated Roma settlements, hence it is important to have a swift progress in the illegal landfills elimination, which is a prerequisite for improving the living conditions of marginalised Roma communities.

	The NRSF sets national targets responding to the EU level targets included in the Framework (Reduce gap in housing deprivation by at least one third; cut gap in overcrowding by at least half; Ensure that at least 95% of Roma have access to tap water).	
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MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	The NRSF provides baseline values based on the FRA Survey 2019, FRA EU MIDIS II 2016 and EU_SILC MRK 2020.	
TARGETS	The NRSF defines quantitative targets responding to the EU-level targets included in the EU Roma framework, and additional targets, for almost all objectives, except for the horizontal objective related to poverty. All established targets are backed-up by a comprehensive needs assessment.	Slovakia is encouraged to set 2030 national targets corresponding to the EU-level targets included in the EU Roma Framework targets for reducing poverty and social exclusion.
INDICATORS	The NRSF uses headline indicators and secondary indicators from the EU portfolio of indicators. It also uses a number of process indicators (from the EU portfolio, plus national indicators).	

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	The NRSF enables Roma citizens and Roma civil society to be part of consultation and decision-making processes, including the preparation of action plan in accordance with the recommendations of the Rules for Public Participation in Public Policy Making adopted by the Slovak Government Resolution No 645 of 17 December 2014. The NRSF plans to involve Roma individuals and Roma NGOs in the evaluation and monitoring process through the Workgroup for Evaluation and Monitoring of the Strategy and also makes use of the Roma Platform.	The NRSF supports capacity building of Roma NGOs but only to a very limited level, hence it should invest more in this area in the next Action plan.

MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS		The NRSF refers to the relevant mainstream sectoral policies that have been adopted or are necessary to be adopted for the successful implementation of the NRSF. The NRSF acknowledges multiple discrimination. In the Action Plan it refers specifically to Roma women and youth.	The NRSF does not refer to the relevant EU initiatives. The NRSF is lacking clear information on mainstreaming Roma equality and inclusion at regional and local levels as well as on how EU, national funds and other financial instruments will be invested for inclusive mainstream policy reforms and targeted action.
FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	Most of the measures will be implemented using ESF+ and ERDF and the Recovery and Resilience Plan. The single Programme Slovakia authorises the office of the Plenipotentiary for Roma communities (within the Office of the Government) to manage part of the dedicated (targeted) allocations for Roma	The integrated approach should be ensured for the implementation of the investments across all relevant ministries.
	OTHER SOURCES OF FUNDING	The measures will be also funded from the state budget including The Fund for the support of national minorities, Council of Europe budget, EEA Norway Grants.	

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING	
The NRCP has an institutional mandate, coordination role and can co-operate with the line ministries for implementation of the NRSF, which is a promising practice to achieve positive changes in Roma inclusion. The measure “Compulsory education from the age of 5” implemented from 2021 has a great potential to have a positive impact on the educational outcomes of children, particularly those coming from unstimulating/ disadvantaged environment. The measure “Mainstreaming the history and literature of Roma, including the Roma Holocaust, into all levels of education, as defined in Recommendation CM/Rec(2020)2 of the Committee of Ministers of the Council of Europe to member states on the inclusion of the history of Roma and/or Travellers in curricula and educational materials” could be also the way forward.	

SLOVENIA

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	National Programme of Measures for Roma of the Government of the Republic of Slovenia for the Period 2021–2030 Adopted on 23 December 2021
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012) : 8,500; 0.53% of total population
National Roma Contact Point (NRCP)	Government of the Republic of Slovenia Office for National Minorities (GONM)

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
The NRCP in Slovenia consists of two employees within the Government of the Republic of Slovenia Office for national minorities. It has a mainly coordination role focusing on Ministry levels, Roma organisations (Working group on Roma issues), reporting, and coordinating the National Roma Platform.	There is no specific budget in place for the NRCP to perform its tasks, and no additional funds are allocated for this purpose. The Office for National Minorities has not received any additional human resources for the performance of the tasks of the NRCP. It is not clear from the NRSF whether the NRCP, e.g. the Government of the Republic of Slovenia Office for National Minorities, has enough resources and institutional weight to steer mainstream policies and have a say in the allocation of funds which are not directly related to Roma, but can affect them.

HORIZONTAL OBJECTIVES

1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION

1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA

KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF bases its measures on the International Holocaust Remembrance Alliance (IHRA) working definition of antigypsyism. Its measures to fight against discrimination and combat antigypsyism focus on awareness-raising and training of police and civil servants working with Roma communities, and on supporting the activities of the Roma community organisations to improve the situation of the Roma as a constituent part of the Slovenian society. It includes measures aimed at preventing discrimination and eliminating prejudices and stereotypes against Roma at the local level, with	The NRSF does not mention support to victims. The measures proposed are essentially preventive, and do not use a baseline and targets.

an emphasis on Roma women, youth and the elderly Roma population. The funds for the measures of this objective will be mainly provided by the national budget dedicated to GONM, the funds for police, and those of the Ministry of Culture.	
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
Under this objective, the NRSF includes measures to promote awareness of Roma culture by co-funding of radio and television programmes for the Roma community (this was already part of the previous strategy), to ensure the work of the Council of the Roma Community in the Republic of Slovenia, and support for activities which disseminate and facilitate and understanding of the Roma culture and language, thereby reducing stereotypes and prejudices The NRSF also has as an objective to improve literacy of members of the Roma community in the field of culture. The measures will be funded by the national budget.	Promotion of positive narratives about Roma and Roma role models could be more specifically mentioned. No amount of funding from the national budget is mentioned. The indicators proposed are output and process indicators, but not outcome indicators which would allow to measure the progress adequately.
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
This objective is covered in the NRSF under the section 3.2 “Objectives and measures in the field of social protection and social inclusion”. The measures proposed include several priority areas interwoven with employment/labour market inclusion related measures and reflect many of the measures proposed in the Council Recommendation on Roma. One of its specific objectives is to reduce current debts and to prevent generation of new debts to public service providers (e.g. utility services, electricity and water supply and other), including by promoting financial literacy. The NRSF includes some indicators. The funds earmarked for those measures are both from the national budget and from ESF+.	The strategic framework does not make any distinction between the different needs of the Roma communities (e.g. the Roma communities in the Prekmurje region and in the South-eastern region have very different levels of poverty and exclusion). No specific amount is provided.

3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
Under this objective the NRSF proposes measures to strengthen the network of multipurpose Roma centres, to connect health services with representatives of Roma organisation, and to support the activities of the Roma community organisations to improve the situation of Roma and recognise them as a constituent part of Slovenian society, and to support them in their activities at local level to prevent discrimination against Roma, including of Roma women, youth and the elderly Roma people. The NRSF sets a national target responding to one of the EU-level targets included in the EU Roma Framework.	The NRSF refers partially to the EU level headlines targets in terms of strengthening the Roma representation and strengthening Roma civil society organisations.

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	The inclusion of Roma in mainstream education is duly addressed in the NRSF through a list of measures such as financial incentives to encourage pre-school education of Roma children, support for learning of Romani as a mother tongue and additional Slovenian teaching for Roma pupils entering primary schools. The NRSF also provides for the systematisation of Roma assistants, education, training, upskilling and employment of Roma assistants. ESF-funded project "Raising the communication capacity of Roma children and pupils" will be continued in a second phase under ESF+ funds. The NRSF sets targets responding to the EU-level targets included in the EU Roma Framework (cut gap in participation in early childhood education and care by at least half;	The NRSF does not address digital skills in education, broadband access, adequate digital infrastructure or the provision of teaching materials for distance learning. The NRSF does not address the risk of digital exclusion. The NRSF measures in education do not explicitly address segregation in education. Moreover, the NRSF does not provide estimates of the concentration of Roma pupils in specific schools.

	reduce gap in upper secondary completion by at least one third).	
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	Under this objective the NRSF proposes measures to promote the inclusion of Roma people in the state measures on the labour market until 2030 by providing for co-funding of social activation programmes, including specifically programmes for Roma women. The funds earmarked for those labour market inclusion measures are both from the national integral budget and from ESF+ funds. The amount of EUR 1.5 million is to be used for Roma targeted measures.	Measures on digital skills for Roma adults and lifelong learning could be developed to ensure better access to the labour market.
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	Under its health objective the NRSF provides for measures aiming at connecting better health services and health promotion centres with Roma communities and other civil society organisations; implementing health education programmes, as well as direct assistance and awareness-training programmes in the environments in which Roma live, targeting in particular Roma adolescents, women, and children Funds earmarked to implement those measures come from the national budget and amount to EUR 100,000 per year.	There is no comprehensive framework mentioned for data reporting and monitoring. Without a comprehensive baseline it is difficult to assess whether the earmarked budget will suffice.
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	Under this objective the NRSF proposes measures aimed at improving the living conditions of the Roma, integrating settlements with a majority Roma population into the settlement system of Slovenia, thus preventing further isolation and ghettoisation, through spatial verification, legalisation and maintenance of the existing locations of the settlements (Act Amending the National Farmland and Forest Fund Act and ensuring	The NRSF could better reflect differences among Roma communities: for example, in the Prekmurje region and in the South-eastern region have very different needs, especially in terms of housing situations (also in connection to segregation).

	access to public goods and promoting the elimination of actual spatial separation, while also developing the infrastructure of areas where the Roma communities live. For the latter objective a budget from the Republic of Slovenia is indicated as amounting to EUR 1,700.000 annually from 2022 until 2024.	
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MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	The NRSF provides comprehensive needs assessment for each covered thematic area justifying the proposed objectives. Precise baselines are missing.	Baselines could be included to allow measuring progress towards EU level targets.
TARGETS	Some national targets are defined in the areas of participation and education responding to the EU-level targets included in the EU Roma Framework. The other targets are mostly qualitative targets covering issues other than those addressed by the EU level targets in a given objective of the EU Roma Framework.	Targets could be defined more closely in line with EU level objectives and targets.
INDICATORS	The NRSF states from the outset that ethnicity-based data are not collected in Slovenia. This is reflected in the indicators used in the NRSF. It includes national indicators, which are mainly output indicators rather than outcome ones, suggesting the effect of proposed measures.	The EU portfolio of indicators is not used. Indicators could be defined closely in line with the EU portfolio of indicators.

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	The National Roma Platform CERV fund is secured for the SIFOROMA5 project in 2023. The NRSF indicates that the Slovenian government will pay due attention to the reports produced by the equality body during the entire duration of the programme.	

MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS		The NRSF does not refer to relevant EU initiatives but is connected with the relevant mainstream initiatives at national level. The diversity of the Roma population is mentioned as a starting point to develop the NRSF. Its intersectional approach is focused on Roma girls and Roma women employment and empowerment. The NRSF more specifically addresses women and girls, more vulnerable members of the Roma community (elderly), as well as children and youth.	The connection with other relevant EU initiatives is missing from the NRSF.
FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	In the multifund programme, under the Specific Objective: 1) the Measures to improve access of marginalised groups such as the Roma to education, employment and to promote their social inclusion are envisaged', with t Roma are part of the targeted group, and not the only targeted group. 2) Measure to strengthen the network of multifunctional Roma centres is envisaged with a total of 2.04 Mio Euro.	
	OTHER SOURCES OF FUNDING	The NRSF globally provides for national funding resources for the implementation of most of the policy measures put forward. For some measures and activities, the amount of the envisaged funds required cannot be precisely determined but will be coordinated as part of the drafting of the state budget, bases for drawing on European cohesion policy funds and local community budgets.	Since baselines are missing from the NRSF it is difficult to assess whether the amounts planned for the implementation of the measures will be sufficient. Concerning measures under the competence of the local authorities, those authorities should ensure and identify funding in their local budgets. It will have to be seen whether sufficient funding is put in place at local level.

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

The systematisation of Roma assistants in primary and secondary schools is a promising practice. Roma assistants seem to have been successful in the framework of the previous strategy to establish the link in the education system between Roma children, their parents and expert workers in educational institutions.

The Slovenian Roma Platform, which has been meeting regularly since 2012 and contributes to monitoring and reviewing the implementation of the national strategy and relevant policies, as well as to the development of new measures, can be highlighted as a positive example of a national dialogue process.

With the help of Roma assistants, children improve their knowledge of the Slovenian as well as the Romani language and knowledge of Romani culture and the culture of the majority population.

Integrating settlements with a majority Roma population into the settlement system of Slovenia, thus preventing further isolation and ghettoisation, through spatial verification, legalisation and maintenance of the existing locations of the settlements (Act Amending the National Farmland and Forest Fund Act).

SPAIN

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	Strategy: National Strategy for Roma Equality, Inclusion and Participation 2021-2030
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012) : 750,000; 1.63% of total population In line with the EU Roma Framework's common but differentiated approach, this Member State was invited to make more ambitious commitments to Roma equality, inclusion and participation than other Member States
National Roma Contact Point (NRCP)	Directorate-General for Family Diversity and Social Services of the Ministry of Social Rights and Agenda 2030

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
The NRCP has the broad mandate recommended in the new EU Roma strategic framework for Member States with a significant Roma population ("more ambitious commitments") and the institutional authority to carry out the appropriate coordination at all governance levels. As one of its core tasks the NRCP facilitates the participation and involvement of Roma civil society in the design, implementation, monitoring and review of the National Strategy and its operational plans, via the National Roma Council and other platforms supporting Roma people.	The resources of the NRCP have not been expanded compared with the previous Roma integration strategy. The NRCP suffers from a certain lack of financial and staff resources. The distribution of competences and executing powers between the national, local and regional administrations, makes cross-sectoral coordination challenging for the NRCP.

The NRCP is fully involved in the distribution and the monitoring of the EU Funds through the Inter-Funds Committee and has been actively participating in the consultation process resulting in the Cohesion Policy Partnership Agreements, as well as in the design of the enabling conditions.	
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HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
Fighting anti-Roma attitudes and discrimination constitutes a horizontal axis throughout the NRSF, which is duly reflected in all sectoral areas, as in key features with the “more ambitious commitments”. The main objectives of this axis are to reduce and prevent discrimination and anti-Roma attitudes (including hate speech and hate crime), and to increase the ability of victims of discrimination to exercise their rights. In line with the EU Roma Framework, and based on data collected in a study carried out by the Council for the Elimination of Racial Discrimination (CEDRE)⁶ intermediate and final targets have been established to cut the proportion of Roma experiencing discrimination by half, and increase by about one third the proportion of the general population who feel comfortable having Roma neighbours, thus responding to the EU level target Included in the EU Roma Framework. More detailed targets broken down by areas of life where the discrimination occurs are provided, as well as for the objective of increasing and supporting the Roma who report discrimination.	It will have to be seen, once the first Operational Plan 2021-2027 is approved, whether the funding is appropriate.

⁶ CEDRE (2020). Perception of racial or ethnic origin discrimination by potential victims in 2020. Ministry of Equality

1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF proposes measures aiming at promoting awareness and dissemination of Roma history and culture to foster recognition and reconciliation, such as celebration of the International Roma Day on the 8 April, and commemoration of the Roma Holocaust /Samudaripen on the 2 August, the incorporation of Roma history and culture into the official academic curriculum and primary and secondary educational textbooks, and involving Roma community in regions with a significant Roma population to raise awareness of Roma history and culture, promoting positive narratives about Roma and their contributions to diversity and to Spanish society. The two related targets indicated in the NRSF aim to raise by about one third the references to Roma in the primary and secondary school curricula.	The planned measures to be implemented by the autonomous communities and at local level are not concrete enough.
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
Under the objective addressing poverty and social exclusion, and the digital divide within its axis for Social Inclusion, the NRSF proposes poverty reduction measures, with a particular focus on child poverty and social exclusion, measures to improve access to financial and social allowances, and to reduce the digital divide between the general population and the Roma. Some measures are specifically addressed to Roma or are part of mainstream programmes for social inclusion. The targets set in the NRSF respond to the EU-level targets included in the EU Roma Framework to cut the poverty gap between Roma and the general population and the child poverty gap between Roma children and other children by at least half.	The framework of the child guarantee and ESF+ funds are earmarked for combating child poverty, but information about amounts allocated in support of Roma is not provided.

3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
To strengthen the participation of Roma, the NRSF proposes measures to foster or establish coordination mechanisms with the civil society organisations to facilitate Roma participation in public policy processes and civic engagement, guaranteeing representation of these organisations in all their diversity. Measures in this area also include building capacity of Civil Society Organisations (CSOs) and women and young people to ensure their meaningful participation. The measures planned for the local and autonomous communities are comprehensive and inclusive, paying a special attention to the disadvantaged groups within the Roma community. Own resources from the General State Administration and European funds (ESF+, ERASMUS+) are earmarked for the implementation of those measures. The NRSF sets intermediate and final quantitative and qualitative targets responding to the EU level target included in the EU Roma Framework (capacitate and engage at least 90 NGOs in EU wide coordinated Roma civil society monitoring; ensure participation of Roma NGOs as full members in national monitoring committees for all programmes addressing needs of Roma communities; double proportion of Roma who file a report when they experience discrimination; encourage participation of Roma in political life at local, regional, national and EU levels (in Member States with significant Roma population)	The establishment of a National Roma Platform could be mutually beneficial for all relevant stakeholders, due to its profile and for bringing together the NRCP, representatives of line ministries, of equality body and ombudsperson institution, and the Roma civil society. The National Roma Platform would have a key role to play throughout the implementation of the NRSF, monitoring, reporting and evaluation.

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	The NRSF has established a comprehensive set of measures reflecting the ones proposed in the Council Recommendation and incorporated the horizontal objective to fight antigypsyism and discrimination.	The measures proposed are ambitious and the targets are in line with the EU level headline targets, although it will have to be seen, once the first Operational Plan 2021-2026 is approved, whether the

	Aligned with the EU headline targets, the measures aim at reducing segregation almost by half, increasing participation in early childhood education to reach 98%, and reducing school drop-out by one third. Furthermore, the NRSF measures aim to equip Roma pupils /students with digital skills, to eliminate illiteracy by increasing training for adults, to increase the academic success of Roma pupils of both sexes and their enrolment in post compulsory education. All measures have also been designed with a gender perspective to address the gap in education between Roma boys and girls. The NRSF sets national targets responding to the EU-level targets included in the EU Roma Framework (cut gap in participation in early childhood education and care by at least half; reduce gap in upper secondary completion by at least one third work towards eliminating segregation by cutting at least in half the proportion of Roma children attending segregated primary schools (in Member States with significant Roma population))	funding is appropriate.
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	The NRSF has developed a comprehensive set of measures, with a strong gender focus, guided by the mainstream targets set out in the Spanish Employment Support Strategy 2021-2024. It has set Roma-specific targets regarding the employment gap, the gender employment gap, and the gap in NEET rate, which are in line with the EU headline targets. In addition, it has developed targets to counter discrimination in accessing employment (a State Office to Combat Discrimination will be created for that purpose). It integrates the youth guarantee dissemination among young	The NRSF indicates that ESF+ resources will be allocated to implement measures that promote the labour inclusion of Roma women, although this is expected to materialise only starting with next year. National funds should be made available as well, in particular for the Strategic Plan of the Labour and Social Security Inspectorate 2021-2023. Concrete funding allocations and their appropriateness will have to be seen once the first

	Roma, and proposes, among others, to revalue itinerant trade and improve the training of Roma who carry out this activity. The NRSF sets national targets responding to the EU-level targets included in the EU Roma Framework (Cut employment gap by at least half; cut gap in NEET rate by at least half; cut gender employment gap for Roma by at least half).	Operational Plan 2021-2026 is approved.
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	The NRSF proposes measures aiming at improving the health of Roma and reducing the health inequalities in the Roma population, with a particular emphasis on Roma children and the elderly. The NRSF promotes healthy environments and strengthening of community action in this area. Furthermore, it proposes to mainstream the health needs of Roma in health strategies and plans from a local, community-based, gender and intersectional perspective.	No specific amounts or origin of the funds are mentioned for the implementation of measures of the health objectives. Owing to the great diversity of proposed measures at the regional level, it is expected that those measures will fall on the regional budget. However, the NRSF does not include indication of possible allocation of ERDF 2021-2027 funds for Roma actions in the field of health. It will have to be seen, once the first Operational Plan 2021-2026 is approved, whether the funding is appropriate. The NRSF uses secondary indicators (self-declared health status, discrimination in health), but does not establish strong links with the EU level headline targets for this objective. The NRSF does not respond through a quantified target to the EU level target included in the EU Roma Framework for this objective of cutting the life expectancy gap by at least half by 2030.

7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	The NRSF established measures which are part of the broader context of the future State Housing Plan 2022-2025, and the National Energy Poverty Strategy 2019-2024. They integrate the notions of equality, environmental justice, and access to essential services. Those measures mainly aim at eradicating shantytowns and sub-standard housing, reduce segregation, guarantee access to essential services and reduce discrimination in housing. ERDF, Recovery and Resilience Plan (RRP), multi-fund strategies and/or State Housing Plan 2021-2025 are proposed to fund the implementation of measures such as urban regeneration actions, rehabilitation and public investment in services in the most deteriorated and segregated contexts. The NRSF sets national targets responding to the EU-level targets included in the EU Roma Framework (reduce gap in housing deprivation by at least one third; cut gap in overcrowding by at least). The NRSF's target on access to tap water goes beyond the EU Roma Framework's headline target, aiming at 100% access.	It will have to be seen, once the first Operational Plan 2021-2026 is approved, whether the funding is appropriate.
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MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	The NRSF uses studies/surveys carried out by Council for the Elimination of Racial and Ethnic Discrimination (CEDRE) to define baseline and targets, in the anti-discrimination area and broadly the EU-MIDIS II data.	
TARGETS	The NRSF does set targets based on a comprehensive needs assessment, and responds through quantitative and qualitative targets to most EU level targets included in the EU Roma Framework.	Under the “health” objective the NRSF does not set a quantified national target responding to the EU level target included in the EU Roma Framework to cut the life expectancy gap by at least half.
INDICATORS	The NRSF defines indicators – both from the EU portfolio of indicators and country specific (new) indicators together with their baseline value, intermediate and final goal. Definition and source of data for the indicators are provided as well.	

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	The NRSF provides for reinforcement of the Council for the Elimination of Racial and Ethnic Discrimination (CEDRE) and the Spanish Monitoring Centre for Racism and Xenophobia (OBERAXE). It also promotes the reinforcement and consolidation of already established coordination mechanism, in particular within the main following bodies: 1) the Technical Cooperation Group, composed of social services at all levels and the NRCP, aiming at working together with the administrations responsible for the social inclusion of Roma and to consolidate the annual reporting system. 2) the Interfund Committee, in order to boost the use of funds to support policies aimed at Roma. 3) the thematic groups of the State	Institutional and administrative reforms are not mentioned in the strategy, but rather reinforcement, and consolidation of existing processes and co-operation with civil society and relevant actors, such as the National Roma Council. A National Roma Platform could be established to bring all relevant stakeholders together, to exchange and share information and practices, coordinate efforts and co-operate (NRCP, line ministries, equality bodies and Roma civil society).

		Roma Council will be increased to reflect the actions envisaged in the NRSFs 4) Sectoral working groups for collaboration between the Ministries responsible for the areas included in the Strategy and the territorial administrations.	
	MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS	The NRSF is connected with the relevant mainstream sectoral policy initiatives, and the fight against discrimination will also be part of the broader National Action Plan Against Racism (NAPAR), currently under development. Mainstream policies in the area of housing (State Housing Plan for the period 2022-2025 and others) incorporate equitable actions for vulnerable groups (including Roma) that are at a disadvantage in terms of access to and enjoyment of public services. The section on reducing poverty has a strong focus on child poverty, mainstreamed through the EU Child Guarantee.	The NRSF could improve diversity considerations by including the Roma migrant population in the measures proposed.
FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	The NRSF makes reference to the use of Cohesion policy funds (ESF+, ERDF and Recovery and Resilience Plan) in its section dedicated to financing for the measures, both for targeted and mainstream actions. It is worth noting that the ongoing final negotiations of ESF+ programmes for the programming period 2021-2027 suggest that one third of the programmes will implement targeted measures explicitly but not exclusively to Roma through the selection of the ESF+ specific objective (j) of promoting the socio-economic integration of marginalised communities such as Roma. It is also expected that Roma inclusion	Overall, Recovery and Resilience Plan investments supporting Roma need to be more clearly identified in the NRSF. Similarly, the NRSF should explain more clearly how the various funding streams complement each other. Since the operational plan provided for in the NRSF for the periods 2021-2026 is not approved yet, it is difficult to assess the relevance of the funding.

		will be covered through mainstream investments under other specific objectives, notably in relation to employment, youth employment, gender equality, education, social inclusion, access to services and material deprivation.	
	OTHER SOURCES OF FUNDING	Other sources of funding include the budget of the General state department and contributions from income tax funding at the national level, as well as subsidies to strengthen the third sector devoted to social action. In the current decade it is expected that the operational plans for Roma inclusion will be updated and that other regions will design theirs. At national level, specific amounts are only mentioned for the "Roma Development Plan" which has been increased by more than 264% in 2021.	Owing to the pending approval of the first Operational Plan 2021-2026, the NRSF lacks concreteness on sections linked to financial provisions.

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

The NRSF dedicates a distinct section to equality between women and men and against violence against women, with related baseline and targets. The gender horizontal axis is also strongly reflected in particular in the anti-discrimination, education, health, and employment objectives.

The NRSF proposes to promote street trading as an important economic sector, and to provide the numerous Roma and members of vulnerable groups involved in this activity with sufficient professional qualification to exercise it successfully, and to improve their working conditions.

The NRSF proposes to increase Roma participation in policy and civic life through capacity building of CSOs, including Roma women and youth.

SWEDEN

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	Strategy for Roma Inclusion 2012-2032 Questionnaire and Report on the implementation
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 50,000; 0.53% of total population
National Roma Contact Point (NRCP)	Ministry of Culture

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
The Swedish NRCP possesses a strong mandate, relevant resources, and managing team to promote effective cross-sectoral coordination. It engages with Roma civil society through a Roma reference group composed of 20 representatives and experts as well as with regional and local authorities through a coordinating body and reports. The NRCP is also responsible for the management of EU funding.	The questionnaire remains vague on the process of nomination of the members of the Roma reference group. Particular attention should be paid to reflect diversity among Roma people and include Roma women and youth, LGBTI Roma, Roma people with disabilities and elderly Roma.

HORIZONTAL OBJECTIVES

1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION

1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA

KEY FEATURES	AREAS FOR IMPROVEMENT
Several institutions are being involved in fighting discrimination, such as the Swedish Media Council which develops methods to combat online antigypsyism among young, and the Swedish Police Authority which is implementing measures to improve its skills in combating hate crime and mapping the action taken against cyber hate crimes. Antigypsyism has also been recognised as a specific form of racism. The report underlines the support to the role and mission of the Equality Ombudsman by an increase of its funding, as well as for anti-discrimination agencies.	The questionnaire remains unclear on the specific Roma dimension of the actions undertaken by the Equality Ombudsman and anti-discrimination agencies. More information about the antigypsyism Commission work and results would be useful.

1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The report refers to several measures have been taken such as the opening of a Holocaust museum, the creation of an international conference on the Holocaust and antigypsyism, the development of Romani Chib language centres and of a library. The Living History Forum promotes information activities at local and national level bringing together Roma children and young people and promoting Roma role models.	
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The report indicates the creation of an Institute for Human Rights responsible also for ensuring the rights of Roma people. The new Institute's roles will include monitoring, investigating and reporting on how human rights are respected and implemented in Sweden.	The report lacks detailed information about the mandate and resources of this new Institute as well as about concrete measures to fight poverty, especially child poverty, and social exclusion.
3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
The report points out the reduced trust gap from Roma towards public authorities thanks to funding support to Roma organisation, the employment of Roma people at municipal level and the development of targeted projects.	The report remains unclear on concrete measures to enhance participation and does not contain actions to promote the cooperation with Roma organisations.

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	The report contains measures such as the inclusion of Roma culture and history in the curriculum, the teaching of the Romani Chib language (recognised as a national minority language) through mother-tongue education and the employment of cultural bridge-builders with Roma language and cultural skills to create synergies and trust with families and increase attendance.	Baseline data that would enable comparison of Roma with the general population are lacking in the report, and seem to be unavailable in Swedish policy documents. The measures planned are formulated very generally, and the Strategy does not contain any indicators to enable monitoring of progress. The questionnaire lacks details on measures to tackle segregation in education and to develop digital skills of Roma pupils. Moreover, there are no specific measures targeting Roma

		girls. There is a lack of specific measures against dropping out before completion of primary school, and early leaving from secondary school. There is no information on whether specific measures would be needed for providing digital resources and materials for distance learning for Roma, possibly due to the fact that the Strategy was produced in 2011.
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	The Public Employment Service has been leading initiatives with local municipalities for Roma employment such as disseminating information among Roma people on the services provided, ensuring individual support and conducting activities targeted towards Roma women.	The strategy does not include measures towards youth and awareness raising campaigns about diversity and inclusion for potential public and private employers.
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	The report points out the recruitment of people with Roma language and cultural skills in social services or healthcare services, the training of staff regarding care of Roma children and the financial support to initiatives promoting Roma healthcare.	Since the document mentions a mapping exercise on Roma inclusion, it would be useful to know more details about the results of this exercise regarding access to healthcare or a mapping of unmet medical needs among the Roma population.
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	The National Board of Housing, Building and Planning in collaboration with Roma representatives produced guidance material for property owners and landlords to raise their awareness of the situation of Roma people on the housing market and to combat discrimination.	The reports lack measures to support social housing of Roma and improve facilities of their habitations.

MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	There are no quantitative baselines to allow measuring progress towards EU headline targets.	Baselines could be included to allow measuring progress towards EU level targets.
TARGETS	There are no quantitative and qualitative targets defined, in line with EU objectives and associated EU headline targets.	In line with the minimum commitments, national targets could be set towards the EU objectives based on a comprehensive needs-assessment.
INDICATORS	There are no quantitative and qualitative indicators defined, in line with EU objectives and associated EU headline targets.	Indicators could be defined closely in line with EU level objectives and targets and the EU portfolio of indicators.

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	The Roma reference group was consulted and involved in the drafting, monitoring and assessment of the strategy and report.	The implementation and monitoring processes lack cooperation with local authorities.
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS	Roma equality and inclusion is well connected to other national policies and strategies in various areas (language preservation, racism, employment, education, health, welfare and housing) and in scope of several states agencies.	
FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	There is no budget provision linked to EU funding in the report. Further use of existing possibilities under the EU funds to support minorities' inclusion should be considered.
	OTHER SOURCES OF FUNDING	The report indicates a global amount of funding that should increase over the next years. Allocated funding should be detailed according to each of the measures or objectives.

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING
The National Board of Housing, Building and Planning in collaboration with Roma representatives produced guidance material for property owners and landlords to raise their awareness of the situation of Roma people on the housing market and to combat discrimination.

In September 2021, the Government proposed an investment of SEK 90 million to bolster efforts in support of national minorities. An action programme for the conservation of Sweden's five national minority languages is to be drawn up and language centres for the revitalisation of Finnish, Yiddish, Meänkieli, Romani Chib and Sami are to be set up.

A Holocaust Museum will be set up in Stockholm in the summer of 2022 and will also highlight the genocide against Roma people. In 2022 and 2023, the Swedish National Agency for Education – together with the Living History Forum– will take systematic action by means of democracy-strengthening initiatives in schools, community education and other areas of adult education, with the aim to combat antisemitism and other forms of racism.

In January 2022 the Institute for Human Rights was established. Its roles include monitoring, investigating and reporting on how human rights are respected and implemented in Sweden. The Institute will also make proposals to the Government on the measures needed to ensure human rights, including of Roma people.

Appendix 1: Tables with the situation of targets per objectives – prepared by EU FRA

Objective 1, Fight and prevent antigypsyism and discrimination

Target 1-A ¹	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IT	LT	LU	LV	NL	PL	PT	RO	SE	SI	SK
Target 1-B ²	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IT	LT	LU	LV	NL	PL	PT	RO	SE	SI	SK

¹ Cut the proportion of Roma with discrimination experience by at least half

² Decrease the proportion of general population who feel uncomfortable having Roma neighbours by at least a third

Objective 2, Reduce poverty and social exclusion to close the socio-economic gap between Roma and the

Target 2-A ³	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IT	LT	LU	LV	NL	PL	PT	RO	SE	SI	SK
Target 2-B ⁴	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IT	LT	LU	LV	NL	PL	PT	RO	SE	SI	SK

³ Cut poverty gap between Roma and general population by at least half

⁴ Cut poverty gap between Roma children and other children by at least half

Objective 3, Promote participation through empowerment, cooperation and trust

Target 3-A ⁵	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IT	LT	LU	LV	NL	PL	PT	RO	SE	SI	SK
Target 3-B ⁶	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IT	LT	LU	LV	NL	PL	PT	RO	SE	SI	SK
Target 3-C ⁷	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IT	LT	LU	LV	NL	PL	PT	RO	SE	SI	SK
Target 3-D ⁸	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IT	LT	LU	LV	NL	PL	PT	RO	SE	SI	SK

⁵ Capacitate and engage at least 90 NGOs in EU wide coordinated Roma civil society monitoring

⁶ Ensure participation of Roma NGOs as full members in national monitoring committees for all programmes addressing needs of Roma communities

⁷ Double proportion of Roma who file a report when they experience discrimination

⁸ Encourage participation of Roma in political life at local, regional, national and EU levels (in Member States with significant Roma population)

Objective 4, Increase effective equal access to quality inclusive mainstream education

Target 4-A ⁹	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IT	LT	LU	LV	NL	PL	PT	RO	SE	SI	SK
Target 4-B ¹⁰	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IT	LT	LU	LV	NL	PL	PT	RO	SE	SI	SK
Target 4-C ¹¹	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IT	LT	LU	LV	NL	PL	PT	RO	SE	SI	SK

⁹ Cut gap in participation in early childhood education and care by at least half

¹⁰ Reduce gap in upper secondary completion by at least one third

¹¹ Work towards eliminating segregation by cutting at least in half the proportion of Roma children attending segregated primary schools (in Member States with significant Roma population)

Objective 5, Increase effective equal access to quality and sustainable employment

Target 5-A ¹²	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IT	LT	LU	LV	NL	PL	PT	RO	SE	SI	SK
Target 5-B ¹³	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IT	LT	LU	LV	NL	PL	PT	RO	SE	SI	SK
Target 5-C ¹⁴	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IT	LT	LU	LV	NL	PL	PT	RO	SE	SI	SK

¹² Cut employment gap by at least half

¹³ Cut gap in NEET rate by at least half

¹⁴ Cut gender employment gap for Roma by at least half

Objective 6, Improve Roma health and effective equal access to quality healthcare and social services

Target 6-A ¹⁵	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IT	LT	LU	LV	NL	PL	PT	RO	SE	SI	SK
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¹⁵ Cut life expectancy gap by at least half

Objective 7, Increase effective equal access to adequate desegregated housing and essential services

Target 7-A ¹⁶	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IT	LT	LU	LV	NL	PL	PT	RO	SE	SI	SK
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Target 7-B ¹⁷	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IT	LT	LU	LV	NL	PL	PT	RO	SE	SI	SK
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Target 7-C ¹⁸	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IT	LT	LU	LV	NL	PL	PT	RO	SE	SI	SK
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¹⁶ Reduce gap in housing deprivation by at least one third

¹⁷ Cut gap in overcrowding by at least half

¹⁸ Ensure that at least 95 % of Roma have access to tap water

Legend:	Set national targets that cover issues addressed by the EU level targets as included in the EU Framework	Set national targets that cover issues other than those addressed by the EU level targets in a given objective of the EU Framework	Do not set national targets – qualitative or quantitative	EU target not applicable
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Appendix 2: Summary of the Roma Civil Monitoring Preparatory Action’s assessment of EU Member States’ NRSFs

This document is based on the monitoring reports about the quality of EU Member States’ new post-2020 National Roma Strategic Frameworks (NRSF)⁷ developed by civil society organisations (CSO) and a survey among CSOs participating⁸ in the Roma Civil Monitor 2021-2025 (RCM) initiative.⁹

1. Participation

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

⁷ NRSFs can take the form of a dedicated strategy or a set of mainstream policy measures relevant to Roma equality, inclusion and participation.

⁸ The following countries were not (entirely) considered in this report:

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

⁹ The full title of the RCM 2021-2025 initiative is “Preparatory Action – Roma Civil Monitoring – Strengthening capacity and involvement of Roma and pro-Roma civil society in policy monitoring and review”. It is implemented by a consortium of the Democracy Institute of Central European University (DI/CEU), including the European Roma Grassroots Organisations Network (ERGO Network), the Fundación Secretariado Gitano (FSG) and the European Roma Rights Centre (ERRC) with participation of more than 120 civil society actors. The initiative is funded by the European Commission’s Directorate-General Justice and Consumers (DG JUST).

cluster of countries ¹⁰	significant improvement	some improvement	no change	worsening
C1: the largest Roma populations and the most acute challenges	CZ SK	EL	ES HU RO	BG
C2: significant Roma populations	FR DE	IT		
C3: mid-sized Roma populations		AT NL		HR PL
C4: the smallest Roma populations		CY LT	SI	

In some Member States, Roma and pro-Roma civil society was deeply involved in **developing the new NRSF**. In SK, the strategy's content was created by working groups co-chaired by civil society experts and with quasi-equal participation of civil society and governmental representatives. In CZ, Roma civil society was even the driver of the strategy's entire rewriting after having criticised and rejected the first draft developed by the government office. In other countries, Roma and pro-Roma civil society and independent experts were at least able to substantively contribute to the content thereof, and their input was significantly taken into account (DE, EL, FR, IT). However, in some cases, CSOs' effective participation was negatively affected due to political instability (BG) or depended on political affiliation with the government (HU) or membership in pre-existing consultative structures (ES, PL).

The main criticisms are related to the fact that in many countries (BG, DE, ES, HU, NL, PL, RO), the governmental agencies responsible for NRSF development did not incorporate civil society's inputs. FR prevented such civil society's frustration by organising individual negotiations with the authors of comments. In addition, the most vulnerable groups of Roma who should be the primary beneficiaries of the NRSFs are usually not involved in this type of consultation; i.e., participation is often selective.

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

¹⁰ The lack of inclusion of Member States in this table either means that the civil society participating in the RCM initiative did not provide an assessment, or that they could not assess the change for a variety of reasons (e.g., the government did not develop an NRSF document).

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

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

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

2. Content of the new NRSFs

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

cluster of countries ¹¹	significant improvement	some improvement	some improvement & some worsening	no change	worsening ¹²
C1: the largest Roma populations and the most acute challenges	CZ EL		ES RO	BG HU SK	
C2: significant Roma populations	DE FR	IT			
C3: mid-sized Roma populations		AT HR NL		PL	
C4: the smallest Roma populations		SI		CY	EE LT LU ¹³

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

Approaches to Roma inclusion

The 2020-2030 EURSF constitutes a significant paradigm shift towards recognising the responsibility of the whole of society for the inclusion of Roma, on the one hand by acknowledging that the widespread antigypsyism/racism against Roma is a crucial barrier to effective inclusion

¹¹ The lack of inclusion of Member States in this table either means that the civil society participating in the RCM initiative did not provide an assessment, or that they could not assess the change for a variety of reasons.

¹² This category includes two countries, EE and LU, which did not develop a dedicated Roma strategy but opted to create a set of mainstream measures for advancing Roma equality, inclusion and participation because of the low number of Roma in their territory. However, in reality, and unlike in the previous period, following the 2020-2030 EURSF and the Council Recommendations they did not develop any document that would specify the relevant measures for ensuring Roma equality, inclusion and participation. We assess this development as worsening their approach to Roma inclusion. Their mainstream policies might have improved, worsened, or remained unchanged, but their decision has significantly reduced the accountability of their efforts to promote Roma equality, inclusion and participation.

¹³ In LU there is no Roma population, but other groups included under the umbrella term 'Roma' such as Yenish/Yéniche live there. In line with diverse international and EU documents, 'Roma integration/inclusion/equality' efforts should target these groups.

(other barriers concern the overall ineffectiveness of governance, public policies and services, regional disparities in socioeconomic development, and others), and on the other hand, by realising that the majority/mainstream population (unlike the Roma) possesses the power, resources and all the instruments necessary for making the respective changes.

Another significant shift in the 2020-2030 EURSF compared to the previous 2011 EU Roma Framework for National Roma Integration Strategies (EUFW) is the inclusion of quantitative EU level targets related to the lives of European Roma to be achieved by 2030. This advancement, therefore, constitutes a step towards implementing the concept of equality of outcomes rather than mere formal equality of opportunities, which in reality usually does not provide for equity and real improvements in the situation of Roma. However, these major novelties and changes are only partially reflected in the new NRSFs.

The efforts of the international Roma movement have resulted in recognition of the problem of **antigypsyism** in several NRSFs, often accompanied by specific measures for tackling this. DE has intensified the fight against antigypsyism by developing specialised institutions (appointment of the Federal Commissioner on Antigypsyism and establishment of the Monitoring and Information Office Antigypsyism), and ES by strengthening protection against discrimination. EL, although it does not use the term “antigypsyism”, addresses specifically racism and discrimination against Roma; within one of the main pillars of their NRSF, it foresees measures aimed at fighting racism and discrimination, stereotypes, hate crime, and hate speech, but it completely omits the serious problem of forced evictions of Roma.

The recognition of antigypsyism has only seldom (DE, FR) led to its mainstreaming in diverse sectoral policy areas relevant for Roma equality and inclusion (that would mean changing the approach towards Roma – such as removal of hidden barriers, indirect discrimination or shift of responsibility for the policies ineffectiveness from Roma to the society or the state), or even to reforms of mainstream policies that would make them more inclusive and effective. Instead, usually (AT, CZ, IT, RO, SK) it has been operationalised only as a standalone field of action (sometimes extensive and elaborate), including measures such as awareness-raising, campaigns, monitoring, education, and memorialisation.¹⁴ In some Member States (BG, HU), the NRSFs formally recognise

¹⁴ An emblematic example of this kind of double talk is identified in SK. On the one hand, the government has adopted a relatively progressive NRSF which recognises the problem of antigypsyism and formulates several specific measures to fight it. But on the other hand, the same government, with the support of fascist political parties, has adopted a package of financial aid for families that excludes most marginalised Roma (as families without employed parents are not eligible). Furthermore, the same law has even cut the pre-existing meagre financial support to children from families with the most profound social problems. All this is framed by a narrative about ‘decent people’ versus the ‘undeserving poor’.

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

antigypsyism as a problem, but the NRSFs do not formulate any measures for fighting it. Finally, some countries do not mention the concept of antigypsyism at all (DK, PL¹⁵).

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

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

Based on the important principle of the 2020-2030 EURSF that considers the **diversity** among Roma, several NRSFs (AT, BG, CZ, EL, ES, IT, SK; partially in HU and RO) pay more attention to the specific situations and needs of Roma women, youth, and children. Moreover, in some cases data collection on the outputs and results of Roma inclusion policies, disaggregated by gender, is systematically planned (AT, BG, CZ, ES, SK). In very few countries are the needs of Roma LGBTI- (CZ), disabled- (CZ) or elderly- (SK) Roma considered. And, in countries where intra-EU mobile Roma, Roma third-country nationals, or undocumented Roma are strongly excluded in social and integration policy (AT, BG, DE, DK, IT, FR, ES), they also remain unaddressed in the new NRSFs. Similarly, linguistic and intra-ethnic diversity among Roma is not considered in countries where it would be relevant (HU, RO, SK).

¹⁵ In PL, traditional Romani culture is explicitly specified as one of the reasons for Roma's social exclusion, and instead of fighting antigypsyism, the NRSF plans to 'promote patriotic education' among Roma to support their social integration.

Relevance and omissions

Problems: ¹⁶	Omitted or insufficiently addressed by NRSF in:
<i>in the field of antigypsyism and discrimination</i>	
Prejudice	AT, BG, EL, HU, IT, PL, SE
hate crime	AT, BG, DE, ES, HU, EL, RO
hate speech	BG, DE, EL, ES, HU, PL, RO, SK
weak protection from discrimination	BG, DE, EL, ES, HU, IT, PL, RO, SK
misconduct by police	BG, DE, EL, ES, FR, HU, PL, RO, SE, SK
<i>in the field of education</i>	
dropping out before completion of primary school	FR, HU, IT, PL, RO, SE, SK
early leaving from secondary school	AT, HU, IT, LV, PL, RO, SE, SK
secondary education/vocational training disconnected from labour market needs	BG, ES, HU, LV, PL, RO, SK
misplacement into special education tracks	AT, DE, ES, HU, PL, RO, SK
increased selectivity of educational systems and concentration in low quality schools	AT, BG, DE, EL, ES, FR, HU, IT, LV, PL, RO, SK
limited access to and support for online and distance learning	AT, BG, DE, EL, ES, FR, HU, IT, LV, PL, RO, SK
low-level digital competences among pupils	AT, BG, DE, EL, ES, FR, HU, IT, PL, RO, SK
<i>in the field of employment</i>	
low-level digital competences among adults	AT, BG, DE, EL, ES, FR, HU, IT, PL, RO, SE, SK
poor access to or effectiveness of public employment services	AT, CZ, ES, FR, IT, RO, SE, SK
discrimination by employers	AT, DE, EL, ES, HU, IT, LV, RO, SE, SK
disincentives to employment (such as indebtedness, low income from work compared to social income)	AT, DE, EL, ES, HU, IT, RO, SE
lack of employment support	AT, EL, ES, HU, IT, LV, RO
<i>in the field of healthcare</i>	
poor access to preventive care	AT, CZ, HU, IT, LV, PL, RO, SE

¹⁶ The table only includes those problems identified **most frequently (in seven or more Member States)** in RCM reports that were delivered by the participating civil society organisations at the time of the development of this report. There are many other critical problems omitted by NRSFs, but they do not appear in this table, as they were identified as omissions in less than seven member states.

<i>in the field of housing</i>	
residential segregation and informal settlements	AT, BG, ES, HU, IT, RO, SK
forced eviction	AT, BG, EL, ES, FR, IT, HU, PL, RO
lack of security of tenure	AT, BG, ES, HU, IT, PL, RO, SE
overcrowding	AT, BG, DE, ES, HU, IT, LV, PL, RO
housing-related indebtedness and risk of eviction	AT, BG, DE, EL, ES, LV, PL, RO, SE
<i>in the field of social protection</i>	
limited access to income support schemes	BG, DE, ES, HU, LV, RO, SK
<i>in the field of social services</i>	
services not reaching the neediest individuals	AT, DE, ES, FR, HU, IT, PL, RO
lack of programmes for addressing indebtedness	AT, DE, EL, ES, HU, IT, PL, RO, SE
<i>in the field of child protection</i>	
specific vulnerability of Roma children as victims of violence	AT, BG, ES, FR, HU, IT, PL, RO
inadequate child/adolescent participation	AT, BG, DE, EL, FR, IT, RO
strengthening of parental responsibility and skills not available or not extended to Roma parents	AT, EL, ES, IT, PL, RO
biased treatment of Roma youth by security and law enforcement	AT, BG, DE, EL, ES, FR, HU, PL, RO, SK
<i>in the field of Roma culture</i>	
Roma history/culture not included in curricula and textbooks for both Roma and non-Roma	AT, ES, FR, HU, IT, PL, RO

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

Social protection and poverty reduction are a priority in the ‘old’ Member States (EL, ES, FR), probably thanks to the high political priority of these agendas in mainstream social policies. However, in CEE countries, where Roma are facing the most profound poverty and welfare provisions have been significantly reduced since the post-Communist transformation (and policies strengthening redistribution have often intentionally left Roma behind – see Footnote 8), this problem remains conspicuously unaddressed. Official narratives, questioned by most experts, continue to perpetuate the narrowest understanding of neoliberal affirmations that education or ‘activation’ can resolve the problems of social exclusion that Roma face.

Although segregation in **education** is a critical/significant problem in many countries with large Roma populations, the measures put forward by concerned Member States (BG, CZ (EL, ES, HU,

IT, RO and SK) are not sufficient to address this issue systematically. Success in secondary education is a field that has received increased attention in NRSFs (AT, CZ, EL, ES, HU); CZ and HU also aim at increasing Roma participation in tertiary education. Additionally, several Member States have focused on tackling the problem of Roma NEETs (AT, BG, EL, ES, HU, IT, SK).

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

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

3. Quality of NRSFs as policy strategies

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

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

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

The **coordination capacity of the NRCPs** remains weak in most Member States (BG, DE, EL, ES, FR, RO), and their role remains primarily limited to communication and reporting functions.

A strengthening of the NRCP's mandate was reported only in two countries: In CZ, where the NRSF foresees implementation of a dedicated project aimed at increasing human and financial capacity of the NRCP,¹⁷ and in SK, where the NRCP will become an intermediary body for implementing Roma-targeted measures to be funded from the ESIF Roma allocation (this, however, creates a risk of further developing parallel and separate interventions for Roma and non-Roma). In no other country does civil society report the stronger involvement of NRCPs in ESIF implementation.

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

4. Conclusions and recommendations

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

1. Member States should also involve representatives of Roma and pro-Roma civil society in ESIF monitoring committees and working groups that help define conditions or calls for proposals associated with ESIF implementation. Handpicked and loyalty-based participation should not be accepted.
2. When commissioning evaluations of NRSFs, Member States should appraise Roma experts' or Roma and pro-Roma civil society involvement in public procurement conditions or criteria.
3. Member States with larger Roma populations should ensure that Roma are among those personnel at authorities who are in charge of Roma inclusion and other related policies. In the countries that have Roma with the necessary qualifications available, excuses for not having capable Roma staff are not credible.
4. The European Commission should condition grants to Member States' authorities that are aimed at supporting National Roma Platforms by specifying the partnership and involvement of Roma and pro-Roma civil society in the design and implementation of activities, thereby overcoming the latter's traditional passive position as recipients. The European Commission should also consider opening calls for national Roma platforms for competition that would enable entrusting the organisation of national Roma platforms to Roma and pro-Roma civil society organisations.

¹⁷ In addition to the pre-existing NRCP, a new position of governmental plenipotentiary for Roma affairs and a dedicated office will be established to coordinate Roma equality, inclusion and participation policy (its complementarity with the NRCP is presently not clear).

5. Roma and pro-Roma civil society should systematically build their expertise in specific policy fields (alongside the general focus on antigypsyism) and related sectoral legal and policy mechanisms (for example, education, employment, healthcare, housing, ESIF, etc.) to enable them to be partners for public administration.
6. Member States should use available EU Funds (incl. ESF+) to support the capacity-building of Roma and pro-Roma civil society.

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

7. In action plans designed to materialise the NRSFs and NRSF revisions, Member States should aim to reform their mainstream policies through the consideration of the barriers (including institutional antigypsyism and structural disadvantages) that Roma and other vulnerable groups face in benefiting from them. Outreach and the effect of mainstream policies on the situation of Roma need to be monitored, as disparities usually signal hidden barriers or discrimination. Roma-targeted measures should primarily facilitate access to mainstream services or tackle specific problems experienced only or disproportionately by Roma.
8. The NRSFs must provide concrete measures for tackling the most severe structural problems of Roma exclusion (residential segregation, forced evictions, misplacement into special education, discrimination in the labour market and extreme poverty) – otherwise, any social inclusion efforts are not likely to be effective.
9. The European Commission can provide specific guidance and support the learning and exchange of knowledge in the areas of critical/significant problems that are most frequently omitted by NRSFs.
10. Countries with less developed targets and M&E frameworks can seek inspiration and learn from the other Member States that have better developed these elements in their NRSFs. In countries where collecting and processing ethnic data is not legally possible, the potential barriers or exclusion of Roma from mainstream policies can be detected via qualitative research methods and socio-demographic proxies, with the involvement of grassroots service providers and civil society organisations.
11. Member States with smaller Roma populations which do not intend to develop a dedicated Roma strategy, and instead have opted to create a set of mainstream measures, should present their NRSFs in the form of well-articulated documents explaining how such mainstream policies contribute to Roma equality, inclusion, and participation; what the safeguards are for preventing Roma exclusion; and establish a mechanism for the assessment of their effectiveness. Otherwise, their accountability will remain minimal.
12. The stronger involvement of subnational governance structures with autonomy in policy fields relevant to Roma equality and inclusion in NRSF implementation is indispensable for promoting their effectiveness. National strategies should be binding for these actors and the system of incentives and sanctions should be robust enough to ensure that national policy is enforced at the local level.