

Integrated Approaches for Roma Integration **Evidence from the ground**

ERGO Network Case Studies – Synthesis Report
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Context

A majority of Roma in the EU are affected by a multifaceted complex of exclusionary factors, including poverty and unemployment, lack of access to public services (eg. health and education), substandard housing and infrastructure, interlinked with varying mechanisms of social and civic exclusion. To effectively counter these conditions, there is a need for integrated place-based approaches that combine measures in different policy fields. Interventions should be based on a comprehensive problem analysis that looks at the interrelation of different issues in local contexts.

ERGO Network has been advocating for the application of such integrated approaches since 2009. We have particularly pointed to the importance of facilitating and ensuring active participation of Roma communities themselves in strategy planning and implementation. The latter has been identified – including by the European Commission – as a crucial success factor. Participation both leads to projects and strategies designs that better fit the needs of beneficiaries and creates co-ownership of objectives and processes. It unlocks the potential of beneficiaries and others stakeholders to contribute towards successful outcomes.

From this perspective we take a closer look at some experiences with integrated approaches for Roma. Still at the beginning of the new programming period, the aim of this paper is to develop a number of concrete recommendations for the successful development and application of integrated approaches.

1. Integrated Approaches in the EU

Integrated or comprehensive strategies are slowly but surely becoming more prominent in national, and in particular in EU policy approaches to Roma inclusion. For example, integrated Housing Interventions (art. 7.2), financed by the ERDF 2007 - 2013, sought to improve housing conditions for marginalized communities in combination with a variety of “soft measures” to tackle related dimensions of marginalization.

In the present programming period 2014 - 2020, Community Led Local Development (CLLD) places responsibility for drawing up integrated local development strategies firmly in the hands of local communities. Building on the success of LEADER in rural development, CLLD aims to unlock territorial potentialities in both urban and rural contexts, with a firm community development and empowerment dimension. Several member states have already asserted they plan to use CLLD to address social inclusion of marginalized communities. Romania, in particular, will build on the work in this area the World Bank has done at its request.

The significance of rural development interventions for Roma inclusion should not be neglected. Whereas images of Roma marginalization mostly come from urban contexts, many Roma in the European Union live in rural areas and/or have rural livelihoods¹. Bottom-up rural development strategies could in theory make a significant difference for Roma communities – in particular where they manage to achieve or promote cross-community cooperation.

Integrated approaches are not only about effective policy delivery to relatively hard-to-reach groups. Integrated approaches should ideally also offer the opportunity for local communities to weigh in on a wider discussion about the future of their village, town or city. It has proven

¹ See: 'Making use of European Structural and investment funds for Roma inclusion. A guide for local authorities', EURoma Network, 2014, p.28.

extremely difficult for Roma communities to play a meaningful role here. Struggling with enduring poverty, stereotyping and discrimination, Roma remain relatively powerless in local political arenas. Both individually and as a community, they often remain reluctant and ill-prepared to claim their proper place in civic life. Public authorities mostly see them as –passive– policy clients, not equal citizens who can and should have their say. This is compounded by the absence in many places of traditions of civic participation in policy development and execution, which leads most citizens – not just Roma – outside policy debates.

In practice, this state of affairs all too often results in Roma issues falling off the agenda. We will see some examples of this mechanism below. Participation in strategy planning and project development, therefore, should also have an empowerment dimension. This requires – as we shall see – an active investment in human and organizational capacity.

2. Case study overview

Chief among integrated approaches, ERGO Network sees much potential for CLLD in both urban and rural contexts. Notwithstanding the fact that CLLD may be applied in contexts relevant to Roma inclusion only to a limited extent, the underlying principles and specific rules governing the CLLD approach make it an extremely interesting and important test ground for local development approaches that act out an explicit empowerment dimension. To support the successful implementation of CLLD –and other integrated approaches, such as ITI - in EU member states, a number of case studies have looked at experiences with integrated approaches in the past programming period.

The aim of the case studies is to formulate recommendations for managing authorities and local authorities and stakeholders to design effective local strategies able to address Roma exclusion. The case studies highlight the participation of Roma communities in strategy planning and implementation.

These qualitative case studies present an in-depth look at:

- the extent to and ways in which Roma have been targeted;
- the results of integrated and LEADER approaches on the ground;
- the manner and effectiveness of integration of ‘hard’ and ‘soft’ measures and;
- extent to which target communities have been able to participate in strategy planning and implementation.

Case studies concern LEADER strategies in areas where a significant number of Roma have rural livelihoods and interventions or strategies that have been implemented under or with reference to ERDF art 7.2.

	LEADER	Housing / Art 7.2
Bulgaria	<ul style="list-style-type: none"> • Lyaskovets-Strazhitsa • Isperih 	<ul style="list-style-type: none"> • Varna • Devnya
Czech Republic		<ul style="list-style-type: none"> • Ostrava
France		<ul style="list-style-type: none"> • Montreuil
Hungary	<ul style="list-style-type: none"> • Abaúj 	<ul style="list-style-type: none"> • Komló
Romania	<ul style="list-style-type: none"> • Timis - Torontal - Barzava • Muscel • Dunarea de Jos 	<ul style="list-style-type: none"> • Cluj

This synthesis paper presents a summary of the findings of each of the case studies – which will be made available separately at a later stage. It then draws a number of general conclusions supported by the findings of the cases studies. The accompanying recommendations focus on the level of national OP regulations, and strategy planning and project implementation at local level and seek to be practical and concrete.

3. Case Study findings: LEADER

Overall findings LEADER: Social inclusion underrepresented – While some positive examples can be found, the overall conclusion from the case studies is that LEADER performs under its potential in promoting the livelihoods of rural Roma and even social inclusion in rural areas in more general. One of the underlying reasons seems to be that local actors do not see the LEADER framework as an instrument that is supposed to help local communities tackle social exclusion. While promoting social inclusion in rural territories is in principle possible under LEADER, the specific framing of LEADER as a ‘rural development’ instrument leads local stakeholders away from considering the promotion of marginalized communities. Mainstreaming without explicit reference to social inclusion, marginalized groups, or Roma is not working.

Real participation of Roma communities in LAGs moreover, is unfortunately rare. The case studies show that being represented in the LAG – even as founding member or at board level – is not a sufficient condition for LDSs to include Roma issues. There is a pressing lack of capacity (and often effort) to engage Roma communities – while conversely many Roma communities and potential beneficiaries lack the knowledge and skills to participate and make themselves heard in strategy planning and implementation. Positive results concern narrow improvement in socio-economic circumstances. However, notwithstanding the bottom-up philosophy underlying LEADER, the approach has so far not offered many real opportunities for Roma to integrate on equal terms into local community life.

- *Integrate specific capacity building for LAGs into CLLD preparatory and implementation phases, to increase ability of local actors to effectively involve Roma communities.*
- *National CLLD guidelines for rural areas should make explicit that social inclusion is among the objectives and actions towards that aim are both eligible and accessible for grassroots organizations.*
- *Social inclusion and community integration indicators should be included in the monitoring framework.*

3.1 Bulgaria

The two LEADER areas investigated in Bulgaria - Lyaskovets-Strazhitsa and Isperih, both in the north-east – present an instructive comparative case. With comparable economic challenges, the active presence of a Roma NGO from one of the villages in the Isperih LEADER area, managed to remain involved in the Local Action Group (LAG) – and develop a project that was supported by the Local Development Strategy. In Lyaskovets-Strazhitsa Roma have no representation in the LAG and their involvement in the LAG process withered after the very early stages.

Roma have been indirect beneficiaries of some the projects executed by municipalities (public space, infrastructure, etc). But in general, the LAG representatives interviewed found that the actions supported by the LDSs did not suit Roma, since they lack the capacity to develop project or business proposals, do rarely have land titles or other collateral and cannot fulfill pre-financing requirements. As in Romania (see below), LEADER was not seen as something that would (or should) particularly fit Roma.

The recurring problem is the lack of capacity and organization on the side of potential beneficiaries from Roma communities coupled with the lack of effort from the LAG to reach out and provide tailored information and support. The continuing Roma participation in the Isperih LAG was supported through close and continuous coaching by a network NGO.

3.2 Hungary

The Hungary case study looked in depth into the Abaúj Leader Area, which is part of the Borsod-Abaúj-Zemplén county, in North-East Hungary. The region suffers from considerable economic depression, with high unemployment of up to 80 -100% in some villages. Three Roma organisations actively participated in the preparatory phase of the Local Development Strategy, which formulated objectives that could accommodate a variety of projects targeting or benefitting Roma. However, among the 160 project ideas in the preparatory phase, only six

mentioned a Roma target group. Among the idea-providers only 3 Roma organisations could be identified.

Throughout the strategy implementation most initial enthusiasm of potential beneficiaries faded, partly due to strict conditions for applicants, which were unattractive or unattainable for Roma individuals or organisations (and likewise for all other potential beneficiaries, as witnessed by the declining number of applications received in each subsequent round of calls). Roma inclusion was not a specific angle for the LAG, so little effort was made to encourage Roma focused projects in the implementation stage. The LAG management could have - but failed to - pay sufficient attention to community mobilisation and skills development, which would have increased the ability of potential beneficiaries to successfully apply for financial support. In the end, out of 317 projects supported by the LAG, only three had Roma among their target group.

A closer look at the three LEADER supported projects that did target Roma indicates that intensive coaching for project promoters can play an important role. It also shows that 'inclusive processes' –that is, not exclusively targeted at Roma, but equally including them– can provide real benefits for Roma at very local level. Such outcomes depend on very specific local constellations, however, that cannot be easily recreated without significant efforts in laying the foundations for community development over a longer period.

3.3 Romania

Seventy-five percent of the 163 LEADER LAGs that received funding in Romania had Roma (individuals or organisations) as founding members. An inventarisation carried out as part of the case study indicates, however, that until now out of more than 6000 projects which the LAGs support, just 11 projects have Roma as beneficiaries. Because LAGs that included minority groups were awarded additional points in the selection procedure, Roma became *point generators* for LAGs in the preparatory phase. They became mostly sidelined in the implementing stages of the Local Development Strategies, however. A detailed look at three LAGs in Romania gives some clear indications of the mechanisms behind that process.

The lack of capacity on the side of the Local Action Groups plays a role here. To engage with Roma communities requires specific knowledge, which is often lacking. Strategy planning processes were mostly done without wide community participation, with only nominal involvement of community representatives. Promotion material and animation was not geared to Roma as a target group, which, on its side, often lacks understanding of application and administrative processes. Pre-financing requirements also biased against most Roma.

Moreover, the investigation revealed that the LEADER process was understood by local stakeholders mainly as a program to support agricultural entrepreneurs, rather than an approach to support local development, with a potentially much wider range of activities and beneficiaries. Interlocutors at the level of the LAG leadership shared that they simply did not see LEADER as a programme for Roma. Partly a result of the narrow strategy planning process, this effectively excluded almost all Roma –who mostly lack land titles, capital goods and/or regularized businesses– to benefit from opportunities of LEADER.

4. Case Study findings – Integrated Housing Interventions (ERDF art 7.2)

Overall findings Housing interventions: a mixed image – Substandard and precarious housing affects many Roma communities, but background, characteristics and details of local situations vary widely. Outcomes vary widely too: the case studies below present results ranging from total failure to something approaching a best practice. The case studies aimed to uncover some of the mechanisms that lead to success or failure. Our findings corroborate many of the synthesis findings formulated by the World Bank².

We want to highlight two elements in particular. Firstly, the housing interventions that connect to a broader vision of how to tackle exclusion of Roma stand out positively, even if the project is not formally part of any local development plan or 'Integrated Urban Strategy' (France, Hungary,

² 'Handbook for Improving Living Conditions for Roma', Worldbank 2014, pp. 224 – 237.

Bulgaria – Devnya). Conversely, projects that are mostly driven by available funding, either fail to materialize or miss important issues (Romania, Bulgaria – Varna and Burgas, Czech Republic). This strongly points in the direction of local political commitment as a decisive factor.

Secondly, even in relatively positive examples, community participation is almost always absent. It is a constant element in our case studies, as well as in the cases that have been collected by the European Commission and the World Bank³. In this connection it is crucial not to equate 'NGO-involvement' with 'Community participation'. While some NGOs do and can represent Roma communities – whether they originate in the communities or not – community involvement will look different from locality to locality. It should be seen as a process in which a wide and fluctuating range of individuals and more or less established organizations will play a role. In many cases, contact with target communities is 'outsourced' to NGOs – whose capability to create effective and meaningful interaction with Roma communities is taken for granted, but rarely checked against delivery. Ticking the box 'NGO' does not in itself say anything about the extent to which communities participate.

- ➔ *Housing interventions should converge with a forward-looking vision of local development, ideally as part of a participative community planning process.*
- ➔ *Longer-term integrated urban plans addressing the housing situation should be accompanied by specific efforts to empower target communities (Roma and non-Roma), so they can take up their roles as equal stakeholders.*
- ➔ *CLLD could offer a strong guiding framework to organise and support community involvement, provided its underlying principles and capacity building prerequisites are fulfilled.*

4.1 Bulgaria

After local protests to a housing project for Roma in Bulgarian coastal city Burgas led this city to withdraw its application for ERDF support, financial support became available for Varna's reserve list housing project, aiming at the construction of a 40-apartment social housing block. Soon running into similar local protests as in Burgas, the municipality did not succeed to engage local opponents into a fruitful discussion about housing needs for people facing marginalization (not only Roma) in the city, despite wide support for the project from local NGOs and churches and in the city council. Roma, as potential beneficiaries, of the project were not involved in the public discussion at any stage. Varna municipality subsequently refrained from presenting a project proposal in the spring of 2014, foregoing the opportunity of EU support. The municipality was then given another the opportunity to apply after parts of the city were hit by floods in June. A new project proposal for social housing was met – once again – by signature collecting in opposition.

A consultation process with Roma in Varna subsequently initialized under the ROMACT programme, moreover, indicated that the proposed construction of social housing blocks did not match the diverse needs and preferences of most Roma who are in irregular housing, who face difficulty with the legalization of their homes, ownership of the building plots, as well as poor infrastructure and access to public services in the Roma neighborhoods. The project proposal seems to have been driven solely by the opportunity to obtain EU funding, not by an investigation of housing needs of Roma, an analysis of the underlying factors and the diversity and stratification within Roma communities. Inclusive consultation of the target community could have pointed to an alternative set of solutions, including self-building, legalization of irregular dwellings and social housing for the least capable.

In the town of Devnya – by contrast – initial public opposition to the housing project was overcome in an inclusive consultation process that included both Roma and non-Roma. It focused on presenting the benefits of a housing project not only for disadvantaged citizens, Roma among them, but for the local community as a whole. The example of Devnya points to the enormous importance of open and active communication with the local community. It also

³ 'Handbook', pp. 238 – 317; 'Housing investments supported by the European Regional Development Fund 2007-2013', European Commission 2013.

shows that local leadership and a willingness to take account of experiences elsewhere can make a real difference.

The active participation of a wide representation of the target communities in the design and formulation of criteria for the 'soft' parts of the integrated strategy in Devnya (which being implemented) is likewise a best practice example.

In Varna, however, consultation did not include the target groups, which included both Roma and non-Roma. The information meetings were targeted at 'ordinary citizens', but acted mainly as a platform for opposition to the project, without ensuring an equal place for other voices. The little inclusive preparation process for the current Integrated Plan for Urban Regeneration and Development that is to receive significant EU financial support under the current programming period, may point to more potential local conflicts.

4.2 Czech Republic

The refurbishment of three blocks of flats mainly inhabited by Roma as 'pilot projects' within an Integrated Urban Development Plan (IPRM) in Ostrava was supported by the ERDF (before the 2010 amendment to art. 7.2). The project realized real material improvements of the dwellings, but pushed out many of the original inhabitants of the flats in favour of new tenants who had to agree to use a 'social service package' by the a local non-profit corporation. This happened as many Roma in Ostrava have since the early 1990s been hit by strong tendencies pushing them out of their homes to increasingly less attractive areas and housing.

The soft measures were implemented by a service provider that was already running a community service center in the Vitkovice neighbourhood. Their activities mainly consisted of offering social support through the existing community center, but no clear documentation is available setting out the activities or results in relation to the 'integrated programme'. The target community and beneficiaries have not been involved in the design or implementation of the plan at any stage – nor has there been a wider civic discussion or consultation about the choice of projects in the Vitkovice area. Significantly – and perhaps as a result of the lack of consultation, the soft part of the program did not address the issue of indebtedness of many Roma households, which is an important factor in their precarious housing situation. Exactly those households could not return to renovated flats and were –as many other Roma in the city– forced into hostels.

The 'pilot projects' for Roma inclusion, had not been evaluated at the time of the research and the municipality could not indicate whether they were planning to do so. While Ostrava -as a former mining city- is experiencing an urban transition that has a profound effect on the city's residential structure, it is unclear whether the Vitkovice housing projects for Roma have not actually reinforced the existing tendency whereby Roma are progressively being pushed to the city's periphery and into precarious housing conditions. The phenomenon of hostels, in particular, has been proliferating in Ostrava, lodging an ever-growing group of Roma in substandard circumstances, where they lack privacy, basic residential security and comfort, in some cases under undue surveillance.

4.3 France

Montreuil - a Paris suburb just outside the périphérique ring road – has been a pioneer in offering transitional housing and social support for a relatively large group of long-term new Roma immigrants in the municipality. To counter slum conditions and chronic insecurity in the illegal camps that had been appearing on the municipality's territory since a bout a decade, the project offers 'bridge housing' (*logement passerelle*) for around 100 Roma families along with social assistance, training, and support to enter the regular housing market.

Inclusion projects for Roma immigrants had been part of the political ticket of the then mayor, who has been insistent in executing the project against significant local resistance.

The project appears to have been fairly successful in delivering its objectives. It also compares positively to earlier '*village d'insertion*'-projects elsewhere in the Île de France region, which have received heavy criticism from grassroots NGO for their closed character. It would be a big

step forward, were the approach in Montreuil to be come the rule rather than the exception. The municipality claims eighty percent of beneficiaries will have entered regular social assistance channels and rental market by the end of 2014, when the project ends.

Earlier experiences in France – in particular with regard to access to employment – impel to caution with regard to longer-term effectiveness. Any participation of the target group or representatives NGOs in the project design or implementation has also been absent and has not been considered, among others out of efficiency motives. This is a missed opportunity in terms of empowerment and enhancing self-reliance in the longer term. Finally it is as yet unclear what will happen to both those that have not managed to enter regular social assistance and those who could not benefit from the project, who live in the remaining shanties. This fixed character is a characteristic of many such projects: eligibility criteria, scope and size are defined by available funding, not by need.

4.4 Hungary

The former mining town of Komló, in south-central Hungary faced massive transformation of the local economy with the demise of much of its industry after 1989. The town has a significant Roma minority, whose quality of housing and neighborhood infrastructure came under significant pressure in the process. Whereas earlier piecemeal housing projects have left a mark of disappointment among inhabitants and local stakeholders, the current municipal leadership – whose Mayor was reelected in October 2014 – adopted a set of more wide-ranging projects with housing components.

A currently ongoing (art 7.2) housing project foresees the purchase and renovation of 17 apartments in a predominantly Roma neighborhood and the demolition of a small ghetto area consisting of former miners' barracks on a dead end road. Tenants will be moved to more integrated neighborhoods –thus satisfying desegregation requirements– and benefit from social assistance and employment opportunities. Community coaching and renovation of communal areas of flats in neighbourhoods where Roma relocate is also foreseen to attempt to ease tensions. The project connects to two other ongoing programmes that offer vocational training, educational support and social assistance.

Taken together, the programs could form the core of genuinely integrated programme – in particular in connection to Komló's initiatives to create new economic activities. As implementation is still ongoing, it is uncertain however how positive and sustainable results will be. Moreover, some elements of current programmes are vulnerable to criticism. The installation of card operated water meters has left tens of households without running water in their homes (having to use outside communal taps instead) without addressing the underlying causes of their inability to pay the water bill. A particular issue is the complete lack of participation of target communities in the project design and implementation. Notwithstanding the (obligatory) involvement of the Roma Self-Government, community members complain of lack of information. In particular, it is a missed opportunity the support team the municipality created to manage tensions arising from the project does not include representatives from the families involved.

4.5 Romania

In anticipation of EU support for housing projects under art 7.2 the city of Cluj was to apply for, the UNDP from 2012 executed a community development project. This project aimed to enhance the ability of the Roma communities in the Pata Rat area to participate in the 'planning and implementation of projects addressing housing deprivation'. Pata Rat on the outskirts of Cluj city is home to four distinct communities and gained some international media notoriety for the depressing living conditions in the vicinity (and sometimes literally on) a garbage dump. The area's newest community consisted of around 40 families who were evicted from their homes in an inner city neighborhood (and who recently won their court case against the municipality).

While the UNDP project managed to create a consultation and community building process in Pata Rat that was in itself rather successful, it became increasingly disconnected from the plans under development by Cluj municipality, which were repeatedly delayed for a variety of administrative and political reasons. Implementation periods being fixed, the necessary

synchronicity that was needed for the UNDP project to feed into the project development by the city was lost.

The project increasingly began to function as a liaison between the communities in Pata Rat and the municipality. While it ensured their concerns and needs were conveyed, it could not facilitate the community's actual involvement in any strategy planning or project development. The city has supported a number of ad hoc measures to ease circumstances in the area, based on suggestions from within the community. It is however unclear how much input from the community has been included in the three ERDF supported projects now on the table (a community center; a scheme to create 10 sustainable jobs; and the construction of 11 homes). Because these are nowhere near sufficient to address the problems of Pata Rat, it is an open question whether the investment of the UNDP in community capacity has been sustainable or whether it has contributed to creating expectations that will not be met.

5. Specific conclusions and recommendations

Over the past programming period, valuable experience has been gained in the design of integrated and/or bottom-up approaches as policy delivery mechanisms for Roma inclusion in Europe. Despite the support of EU structural funds, however, these have yet to create the sought for structural change to how Roma exclusion is being tackled at local level.

For ERGO Network, a central issue remains that virtually nowhere Roma are involved in strategy planning and project implementation processes as equal stakeholders. Even in the most positive examples, they remain mostly policy clients, not active participants in a wider community process. The development and implementation of social inclusion interventions for Roma is often a process characterized by mutual blindness of Roma communities and local authorities: strong presuppositions on both sides, but very little actual contact. One recurring presupposition is that it is difficult if not impossible to involve Roma in a meaningful debate about needs, priorities and objectives. Roma communities are reluctant to engage, often as a consequence of and coupled with a lack of ability to represent themselves. However, while community activation and involvement is not an easy process, it is never impossible and – if taken seriously by both sides – would help tackle many of the issues identified in the present case studies.

ERGO Network strongly believes that better results can be achieved if communities (are enabled to) participate in strategy development and project implementation. Inclusion programmes should not only bring concrete material (housing, infrastructure) or human capital improvements, but should also contribute to empowerment of marginalized communities. While this is well reflected in the European Commission guidance for CLLD and the Handbook for Improving the Living Conditions of Roma, the case studies show that application of this principle cannot be taken for granted. Community involvement should be a central element in Integrated Approaches; an element that should be actively sought and supported.

In addition to the general findings formulated above, we present a set of specific conclusions and recommendations based on the findings of the case studies.

- 1. Integrated approaches and LDS should come with credible Community participation trajectories** – Interlocutors cite a range of reasons why Roma communities are not being actively involved in strategy planning and project implementation, but the bottom line is there is a lack of awareness of the crucial importance of involving citizens in the development of the interventions that target them. Active and real involvement of local communities is a real game changer and leads to much more satisfactory outcomes. The weakness of community participation moreover, is not limited to Roma; in many cases, there is little involvement of citizens in local development projects at all. In accordance with the European Code of Conduct on Partnership, public authorities should pay specific attention to ensure “in particular the most vulnerable and marginalised communities, which are at highest risk of discrimination or social exclusion, in particular persons with disabilities, migrants and Roma people” have access to partnership processes.

- *The presentation of a credible plan to ensure active involvement of local and target communities in strategy planning and implementation should be included in the selection criteria. The participation plan should take into account and benefit of the diversity of the Roma communities and its varying needs.*
- *Managing authorities should seek to develop and apply a (set of) 'participation indicators'.*

2. Address lack of capacity among Roma and public and private stakeholders at an early stage – The mutual engagement between public authorities (and other stakeholders) and Roma communities is often problematic. In LEADER/CLLD 'animation' is foreseen to ensure appropriate outreach to and involvement of difficult to reach communities beneficiaries. Local Action Groups and other involved actors (eg. municipal officers, external experts) however often lack the specific skills and knowledge of community building methods and approaches to engage with and mobilize Roma communities. If the presence of this capacity cannot be proven, specific training in this area should be part of the preparatory process. Investment in the capacity of Roma organisations / representative associations to play their role as equal stakeholders should be done in addition to creating their ability to develop project proposals. In this connection, the fact that financial requirements often act to discourage NGOs to develop project applications needs to be mentioned as well.

- *Managing authorities should require municipalities and Local Action Groups to present a credible capacity building trajectory as part of their concept notes for CLLD and Urban Development Strategies.*
- *A part of the budget of LDSs and Integrated Urban Plans should go towards investments in citizen's empowerment, in accordance to need.*
- *Managing authorities should consider measures to enhance accessibility of LDSs for project promoters with limited financial capacity.*

3. Local political commitment matters for results – Political commitment, willingness and vision to address Roma exclusion make a great difference. These factors not only decide whether projects are carried out at all, we tentatively concluded they impact greatly on the results of projects. From the point of view of Value for Money, financial support is best given to localities that have a track record of achieving successful and inclusive outcomes. Along with more rigorous quality control, including this principle in allocation protocols (that control for bias against smaller municipalities) could be a great incentive for urban governments to care more about results of projects and interventions. The ability and willingness to engage with local citizens is an important element here, too – since investments in Roma communities is not seldom a matter of public controversy. Even-handed information provision is crucial here, allowing a platform for a diversity of voices and ensuring that addressing the needs of Roma is not in opposition to addressing the general needs of the community as whole.

- *Municipalities should be required to present a proven their track record in terms of a set of outcome indicators, to assess their ability to translate project funding into results for social inclusion.*
- *LDSs and Integrated Urban Plans should always include credible public information campaigns and consultation trajectories.*

4. Housing interventions need to take account of the diversity of needs and opportunities. – Housing interventions should take a holistic approach, taking account of the diverse needs and capabilities within Roma communities, as well as the background of their lack of access to the regular housing market (indebtedness, poverty, covert discrimination, irregular home-ownership). Provision of social housing, either newly-built or after renovation, will often serve just a small sub-community of Roma, leaving other possibilities (legalization, self-building) and needs unaddressed. Improvement of adverse living conditions can come from a wide range of opportunities, not always necessarily entailing (re)construction. To generate the right set of measures can be a process that extends beyond the preparatory phase and will benefit from a strategic framework that allows the progressive definition of measures.

- *Selection Committees should critically assess how situational analyses connect to project design and favour strategies with a hard results framework, but flexibility in terms of actions.*

→ *Selection Committees should specifically check that analyses and proposed actions take account of direct consultation of potential beneficiaries.*

5. **Encourage real integration of ‘soft’ and ‘hard’ measures** – The soft dimension of integrated approaches are often lacking in quality and attention. In many cases the integrated character of the project consists of the mere juxtaposition of activities without any real synergies or interconnections. The soft measures are, moreover, rarely rigorously evaluated and results often remain in the air. There is a real lack of quality control in this area, and very few proven approaches. This is partly due to the fact that the root causes of the socio-economic exclusion of Roma – discrimination and widespread mutual distrust – are rarely taken into account. A key problem in this area is the (lack of) coordination between the bodies in charge of the implementation of both types of interventions.

→ *Managing authorities should conduct rigorous ex-ante and ex-post quality control of soft program elements. This should go beyond output indicators, requiring specific result indicators from project promoters.*

→ *Monitoring and evaluation should include the views of target communities and beneficiaries. Where applicable, programs should include community monitoring.*

→ *Clear frameworks for cooperation should be set to allow for proper coordination between the bodies managing the different Funds from the planning phase onwards; not only in the implementation phase.*

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The European Roma Grassroots Organisations Network (ERGO Network) is a foundation with over 15 years of experience in Roma issues. ERGO network has over 25 members and allied organisations from different European countries and works closely with strategic partners and has strong connections with Brussels based networks and EU stakeholders.

ERGO Network and its members and allies have built unique experience in hands-on Roma issues and functions as a centre of expertise for equal citizenship, social inclusion and fight against discrimination of Roma.

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