



**Recommendations for the national  
strategic frameworks under**

**THE NEW EU ROMA STRATEGIC  
FRAMEWORK FOR EQUALITY,  
INCLUSION AND PARTICIPATION**

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[www.ergonetwork.org](http://www.ergonetwork.org)



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This publication provides recommendations for national governments that should be prioritised when developing national strategic frameworks in the first months of 2021.

These recommendations have been developed by the European Roma Grassroots Organisations (ERGO) Network, based on the organisation's previous policy and monitoring work in the area of equality, inclusion and participation of Roma and on valuable on-the-ground input from ERGO Network's member organisations across Europe and from Roma and pro-Roma organisations members of the EU Roma Policy Coalition.

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## **A brief overview:**

# EU STRATEGIC FRAMEWORK FOR ROMA<sup>1</sup> EQUALITY, INCLUSION AND PARTICIPATION 2020-2030

<sup>1</sup> The reference to 'Roma', as an umbrella term, encompasses a wide range of different people of Romani origin such as: Roma, Sinti, Kale, Romanichels and Boyash/Rudari. It also encompasses groups such as Ashkali, Egyptians, Yenish, Dom, Lom, Rom and Abdal, as well as traveller populations, including ethnic Travellers or those designated under the administrative term Gens du Voyage and people who identify as Gypsies, Tsiganes or Tziganes, without denying their specificities.

On 7 October 2020, the European Commission published a Communication<sup>2</sup> to the European Parliament and the Council on the new Strategic Framework for Roma Equality, Inclusion and Participation for 2020-2030. The new framework is replacing the previous EU framework for national Roma integration strategies 2011-2020. The new framework is a positive step in the right direction; it shifts the perspective of the previous EU framework to **a more balanced approach between social inclusion, human rights and empowerment objectives**. It asks Member States and Enlargement countries to develop national strategic frameworks (NSFs), not just strategies, proposing an **intersectional approach** to tackle discrimination and defining **intersectional discrimination** as such for the first time. The new framework includes a good reference to **antigypsyism** using the spelling proposed by the [Alliance against Antigypsyism](#). The framework addresses Enlargement countries on an equal footing and acknowledges the importance of the **Western Balkan** region for the EU, while the Neighbourhood countries are mentioned for the first time in relation to Roma inclusion under the current framework.

In the guidelines<sup>3</sup> annexed to the Communication, the EC asks States to **recognise antigypsyism** and act against it, calling them to dismantle and **prevent systemic/institutional/structural discrimination** experienced by Roma and prioritises environmental justice. It equally

breaks new ground by introducing the fight against Roma poverty as a specific objective with associated indicators. However, while the guidelines are very good in general, they leave it up to governments to pick and choose what to include in their own frameworks.

The EU Roma strategic framework also contributes to several relevant initiatives, namely, to implementing the **EU anti-racism action plan**, the **European Pillar of Social Rights** and to the achievement of the UN Agenda 2030 and **Sustainable Development Goals**. However, there are no specific links to the Social Pillar and its 20 principles, and the SDGs made in the EC Communication. In addition, it does not mention that the Social Pillar and SDGs will also contribute to implementing the Roma framework in mutually reinforcing processes. Nothing is said either about the interplay of the Framework with the European Semester and the European Green Deal, and how Roma equality, inclusion and participation will be mainstreamed in these overarching EU policy processes.

**Diversity of Roma** is misleading in the Communication, whereby diversity of Roma is equated with the multiple identities of people (LGBTI, women, old, youth, migrant etc.), while it should be understood primarily from its ethnicity dimension: Roma, Sinti, Travellers, Gens du Voyage, Gypsies, etc.

<sup>2</sup> Commission Communication available at : [https://ec.europa.eu/info/publications/new-eu-roma-strategic-framework-equality-inclusion-and-participation-full-package\\_en](https://ec.europa.eu/info/publications/new-eu-roma-strategic-framework-equality-inclusion-and-participation-full-package_en)

<sup>3</sup> Idem 1



## OBJECTIVES AND TARGETS

While the new Framework includes new horizontal objectives and specific targets in each of the 7 priority areas, non-ambitious minimum commitments are set in the areas of education, health, housing, the fight against antigypsyism and discrimination and participation. The baselines used for all targets are not all encompassing or up-to-date. During the preparation process, no measures were taken to produce consistent, representative, and up-to-date baselines across all priorities and countries.

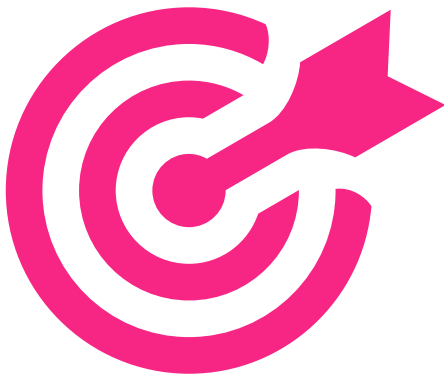
The renewed common minimum commitments set for Member States and Enlargement countries are low overall, leaving it up to countries with large Roma populations to set up more ambitious commitments, on the premise that it is these states that have bigger or probably more visible problems than the ones with smaller Roma population. Governments are left to decide over measures to combat antigypsyism while there are too few targets on antigypsyism under the horizontal priorities to make a significant difference. It is positive that the EC asks for national needs assessments to set baselines and targets for all cross-cutting groups, but it sounds unrealistic in terms of timeline and resources.



Allowing at least 50% segregation in primary education is an EU law violation, as segregation is regarded as racial discrimination by the Committee on the Elimination of Racial Discrimination.

### Some targets are too low or inadequate:

- **Antigypsyism and discrimination:** less than 13% of Roma feeling discriminated is not realistic; the numbers can be up to 3 times higher than the baseline of 26% used, available in some countries. Additionally, targets aim to reduce perception of discrimination instead of reducing de facto discrimination. Lastly, reporting of discrimination should be mentioned under antigypsyism instead of participation, as it should be regarded as an issue of access to justice.
- **Roma participation** is addressed in general terms and with few commitments made in the areas of monitoring and representation and diversity among the Commission staff.
- **Education:** targets remain below those defined by the SDGs. The proposed target of 70% in pre-school education and of reducing the gap in upper secondary completion by a third are too low. Allowing at least 50% segregation in primary education is an EU law violation, as segregation is regarded as racial discrimination by the Committee on the Elimination of Racial Discrimination.
- **Housing:** Housing deprivation would only be eliminated by a third from 61%.



### Some targets are positive:

- **Employment:** At least 60% in employment from a baseline of 43%. However, the target for women in employment should be equal to that of men.
- **Poverty reduction:** A 40% target on poverty reduction from the baseline of 80% is in line with SDG 1.2, even if the current numbers are not at 80% in some regions at national level.
- **Life expectancy:** The target to reduce the gap between Roma and non-Roma from 10 to 5 years is positive, however there are no targets on access to health in general.
- **Housing:** Good target against overcrowding (cut by half from 78%).
- **Access to water:** Very positive to have a target on access to water (95% from 70%).
- **Revision of Roma Civil Monitor:** Participation of Roma is foreseen in all Roma programmes and in monitoring committees.



### Missing targets:

- No target for **primary and secondary education**.
- No target for **youth employment** and no link with SDG Goal 8 on Decent Work and Economic Growth and the Youth Guarantee.
- No links to other relevant SDGs: SDG 3 on **good health and wellbeing**, particularly on universal **health coverage** by 2030, SDG 6 on **clean water and sanitation**, SDG 7 on **affordable and clean energy**, SDG 16 on **peace, justice and strong institutions** as targets for Roma.
- No mentioning of **housing segregation and forced evictions**. No target on **illegal housing** and consistent references to the 20 principles of the European Pillar of Social Rights.
- The horizontal objective on antigypsyism does not sufficiently articulate the need to develop preventive measures and counter-narratives to promote **awareness of Roma history, culture, recognition and reconciliation**.
- **Political participation:** no concrete targets are provided.



**Recommendations to  
Member States and  
Enlargement countries on**  
DESIGNING NATIONAL  
STRATEGIC FRAMEWORKS  
(NSFS) FOR EQUALITY,  
INCLUSION AND  
PARTICIPATION



## Member States and Enlargement countries should demonstrate a non-tokenistic approach to Roma equality, inclusion and participation(...)

### Key recommendations

Member States and Enlargement countries should **demonstrate a non-tokenistic approach to Roma equality, inclusion and participation** by going beyond the minimum targets and specific objectives set in the EU strategic framework. In this regard, all governments<sup>4</sup> should:

- **Prioritise the designing of a plan or set of measures for recognising, preventing and fighting antigypsyism** and discrimination, segregation in education and housing and anti-Roma prejudices and stereotypes. **Promote awareness of Roma history, culture, recognition and reconciliation and prioritize self-representation** of Roma.
- Ensure **EU and national funds** are used towards inclusive mainstream policy reform, targeted action and communication for Roma equality, inclusion and participation at national and local level.
- **Ensure civil society and institutional consultation and coordination mechanisms** are built in a transparent way and **provision of access to information** is guaranteed. **Ensure full and effective participation of Roma and (pro-) Roma civil society** at all levels and all stages of the NSF design, implementation, monitoring and evaluation.
- Enhance the role and mandate of **National Roma Contact Points (NRCPs)** under the NSFs. Additionally, involve NRCPs in the elaboration of mainstream inclusion policies, especially those under the national recovery plans, green and digital inclusion to ensure congruence and mutual reciprocity with NSFs.
- **Roma women and youth** must be at the centre of all policies and processes affecting them, while **gender mainstreaming** needs to be effectively implemented and monitored throughout thematic areas.
- Ensure an adequate and appropriate response, at national levels, to the particular risks experienced by Roma communities due to the **Covid-19 pandemic** and ensure an adequate and appropriate mainstreaming and inclusion of Roma communities in the social and economic policies and programmes deployed to address and restore the impact of pandemic.

<sup>4</sup> Recommendations in this document apply equally to EU Member States and Enlargement countries. To the extent relevant, Neighbourhood countries should use these recommendations as inspiration to improve their policies and measures on Roma in their countries.

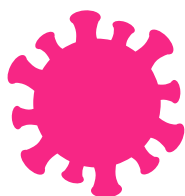
## Alignment of national frameworks with relevant EU policies and processes

- Fully align national strategic frameworks with all major European policies and processes, such as the European Semester, the European Pillar of Social Rights, the Action Plan Against Racism 2020-2024, Youth Strategy 2019-2027, Youth Employment Initiative, LGBTIQ Equality Strategy 2020-2025, Disability rights strategy for 2021-2030, New Pact on Migration and Asylum, upcoming Strategy on the Rights of the Child 2021, the Child Guarantee, Digital Services Act and European policies on Artificial Intelligence and Robotics, Green Deal, New European Agenda for Culture, Race Equality Directive (RED), Victims' Rights Directive, Employment Equality and Recast Directives, Framework Decision against Racism, Charter for Fundamental Rights, UN Sustainable Development Goals, OSCE Action Plan for Roma and Sinti, Council of Europe Roma and Travellers Action Plan 2019-2021 etc.

## Monitoring and data collection

- Ensure coherence and a level playing field with all Member States and Enlargement countries by establishing baseline data in the development of their national framework strategies up to their final adoption by the Commission.
- Set up strong data collection mechanisms that can be comparable and guarantee fundamental rights and protection of privacy.
- Ensure the collection of ethnic disaggregated data in the framework of positive action measures, based on Article 19 of the Treaty on the Functioning of the European Union (TFEU), Article 8 (4) of the Data Protection Directive taken in conjunction with Articles 5 and 15 of the Racial Equality Directive that allow positive action measures on the ground of racial and ethnic origin, as long as their impact on minority groups is substantial.
- Ensure the participation of the new Civil Society Monitor and CSOs in the data collection and regular evaluation and monitoring of Roma policies and measures, as to improve the reliability, transparency and accountability of those processes.
- Develop specific indicators for reporting on Roma inclusion measures funded by the European Structural and Investment Funds. Specific indicators focusing on the Roma population should be established for Operational Programmes that specifically target Roma (explicit but not exclusive approach); develop process indicators that guarantee the impact of the initiatives and measures targeting the Roma population and adherence to the non-discrimination principle for Operational Programmes in which Roma can be beneficiaries along with other groups.





- Include Roma NGOs and CSOs, as part of the FRA working party on indicators and data collection, make their work transparent and support their involvement.
- Review and report on how Roma issues have been addressed in the ESI funds and Operational Programmes, how the enabling conditions concerning Roma and fundamental rights have been fulfilled, how the horizontal principle of non-discrimination has been implemented and the effectiveness, efficiency and impact that the implementation of ESI funded programmes had on Roma.
- Make the reporting of the NRCPs publicly available and ensure Roma participation in the elaboration of the reports.
- Connect the new Civil Society Monitor to the reporting of National Roma Contact Points.
- Address difficulties for Roma in securing adequate personal documentation and use of civil registration systems and secure an effective response to the difficulties for Roma in moving to another Member State or enlargement country.

## National budget allocation, EU funding and Covid-19 impact

- Allocate adequate national budgetary means for the implementation of NSF's and related local action plans.
- The MFF 2021-2027 should strengthen measures that prohibit the use of EU funds on segregation, institutionalisation or social exclusion of people, strengthen social inclusion and integration of children in the communities through better EU investments, strengthen the role of civil society and service users in the decisions and EU-funded programmes related to children in institutions, expand rules and conditions to ensure that EU funds do not support institutionalisation of children and that these funds are used for sustainable national reforms.
- Ensure that the ESIFs continue to play a central role in enabling implementation of initiatives to improve the situation and experience of Roma communities. Particular attention should be given to: ensuring that the enabling condition relating to national Roma strategic frameworks is met to a high standard; the horizontal equality and non-discrimination principle is implemented on a more systematic basis and includes a stronger focus on Roma; and specific funds could be ring-fenced to advance equality for and improve the living conditions of Roma communities; in addition, according to the 'partnership principle', CSOs need to be included in the preparation and implementation of programmes and partnership agreements and in monitoring committees.

- Include Roma, in full alignment with the objectives and targets of the EU Strategic Framework, in the preparation of National Recovery and Resilience Plans by April 2021, especially in support of job creation and economic and social resilience, contribute to environmental sustainability and foster digital transformation.
- Use other major EU funds, such as EU Solidarity Fund, InvestEU, NextGeneration EU, ReactEU and the digital and green transitions and relevant priorities identified in country specific recommendations under the European Semester to target Roma and any other vulnerable groups.
- Western Balkan countries should use the economic and investment plan to support marginalised groups, notably Roma communities. Additional relevant EU funds, related to COVID-19 recovery or other external relations support measures, such as the Neighbourhood development and cooperation instrument (NDICI) should be mobilised to promote the inclusion of Roma.
- Digital services should be made more widely accessible to under-privileged communities, ensuring that national budgets allocated to education, health and other services that have a digital component also include provisions targeting the digital gap.

## Mainstreaming and cross-cutting approach

- Undertake a similar mainstreaming approach applied to immigrant integration policies in NSFs in regard to Roma inclusion in order to address multiple and intersectional discrimination as to protect EU mobile and migrant Roma, particularly migrant and intra-EU Roma children, Roma women, children and youth, Roma LGBTIQ+, Roma with disabilities, elderly persons.
- Include cross-cutting priorities that have been unaddressed or under-addressed in previous national strategies in NSFs, such as antigypsyism, intersectional discrimination, poverty, material deprivation, housing evictions, multiple and intersectional discrimination, child protection, gender mainstreaming, LGBTIQ+ Roma, Roma with disability, elderly, environmental racism, diversity within Roma groups, Roma participation, Roma identity and cultural heritage.
- **Build solidarity against racism:** enable exchanges on anti-racism narratives, policies, measures between Roma and other anti-racism movements (including on antisemitism, islamophobia, afro-phobia, LGBTIQ+ issues, migrants etc.).

Build  
solidarity  
against  
racism



## ACTION PROPOSED TO MEMBER STATES AND ENLARGEMENT COUNTRIES FOR PRIORITY OBJECTIVES AND TARGETS

In general, Member States and Enlargement countries should go beyond the proposed targets in the new strategic framework and address housing segregation, social housing, forced evictions and lack of infrastructure; implement all 20 principles of the EPSR.

# Horizontal priorities



## POVERTY

**Member States and Enlargement countries should fully implement, by 2030, UN Sustainable Development Goal 1 on No Poverty, as well as the entirety of the European Pillar of Social Rights and the full set of indicators of the Social Scoreboard, as 80% of the Roma in Europe are currently experiencing poverty and social exclusion.**

- The target of poverty cut in half should start from the actual poverty numbers throughout the country. This means if the country has now 40% poverty of Roma, it should be down to 20%, while ensuring that there are no pockets of poverty at regional level that still reach 80% in some regions. There should also be a minimum target of 40% in every region at national level.
- Member States and Enlargement Countries should put in place measures to ensure adequacy of real needs, as well as better coverage and take-up of social benefits, such as adequate minimum income schemes, by making them automatic, reducing red tape, eliminating conditionalities and sanctions, and tackling stigma and discrimination against Roma or other recipients.

- Roma poverty should be measured annually through Eurostat, using the combined AROPE indicator – at risk of poverty, material deprivation and households with low work intensity – to be able to keep track of the multifaceted aspects of poverty and social exclusion in Roma communities.

- Member States and Enlargement Countries should provide anti-discrimination training to public offices disbursing social protection and penalise discriminatory behaviours in relation to minority recipients, including the Roma. It is necessary to combat the public discourse that stigmatises benefit claimants and people experiencing poverty.



- Governments should put in place programmes that ensure that social protection entitlements are accessible to categories of the population experiencing multiple difficulties in accessing them, such as not knowing how to read or write, not having an ID card, not having a fixed address or a bank account, not being able to apply online etc.
- Governments must invest in rights-based activation strategies that put the beneficiary at the core, ensure ownership and fight discrimination. They must put an end to punitive conditionality that involves sanctions and benefit cuts.
- In order to design an effective social safety net, governments should consider piloting targeted social audits to identify poverty risks stemming from the intersectional vulnerabilities of Roma.
- The fight against poverty and social exclusion should be made a transversal dimension through the NSF's implementation, ensuring that quality, sustainable employment opportunities, inclusive education, quality housing and adequate healthcare contribute to the overall improvement of Roma wellbeing and quality of life.
- Appropriate links should be made to the Child Guarantee, where Roma children must be named as explicit beneficiaries, and with the upcoming EU Strategy on the Rights of the Child.



## PARTICIPATION

**Member States and Enlargement countries should include Roma participation targets on the design and implementation of national and local Roma strategies, by suggesting a minimum benchmark of 50% Roma participation, based on self-identification, with a provision on gender equality.**

- National strategic frameworks should include minimum standards or measures on the implementation of the right to participation to ensure full and effective participation of Roma at all levels and all stages of the NSF design, implementation, monitoring and evaluation, by suggesting a minimum benchmark of 50% based on self-identification, with a provision on gender equality. This involves making adequate human and financial resources available to allow for proper participation processes, and providing public servants with training on, and sufficient time for, engaging such organisations. Tools and methods used by public authorities for implementing participation could be diversified and improved.
- Structured mechanisms including civil society and institutions should be established at national level for setting quality assurance standards, criteria and guidelines for participation and

coordination, including the time necessary for effective participation in the design, implementation, monitoring and evaluation of national strategic frameworks. Such mechanisms will also enable exchanging and disseminating good practices, creating spaces for reflection and critical thinking and promoting some level of coordination between existing dialogues, while respecting their differences.

- The Roma Civil Monitor should be made a condition in the implementation of the NSFs in all Members States and Enlargement Countries. The initiative should be revised also by enhancing the capacity and resources of NGOs through the allocation of specific funding in consultation with civil society organisations.
- Roma-specific targets should continue to be part of the opening and closing benchmarks in the relevant accession chapters in Enlargement Countries.
- Roma youth should be offered dedicated employment and traineeships positions in national structures linked to the implementation of national Roma platforms.
- Roma should be recruited in decision-making positions at local, regional and national level.
- The EU and Member States and Enlargement countries should make funding available for Roma CSOs, including for small grassroots organisations, through national and EU funding. Such funding should cover, as appropriate, the diversity of Roma represented by CSOs NS variety of activities, such as service provision, watchdog activities, advocacy, litigation, campaigning, human rights and civic education and awareness raising.
- Governments should consider favouring multiannual and core funding over short-term project-based funding, which would allow for a more sustainable basis for the work of CSOs as well as long-term planning. For the sake of more effective application procedures, twostep procedures could be used more frequently, where initial applications are short, and only pre-selected projects from the first round are required to deliver a full application file. Audit and reporting requirements placed on CSOs and other associations should be proportionate to public funding made available and to the size and structure of the receiving organisation. In the context of co-funding, the requirements should be proportionate and take better account of the scope of projects and the type of organisations applying.
- Roma CSOs and activists across Europe face physical and verbal attacks, harassment and intimidation by non-state actors. These incidents take place both online and offline. States should refrain from the stigmatisation and victimization of human rights defenders and CSOs. Moreover, they should actively condemn and sanction hate speech and hate crimes committed against CSOs and fully implement their positive obligations under international law and applicable EU law to protect CSOs and their members. Data on hate crimes against human rights CSOs should be collected and published.





## ANTIGYPSYISM

The new NSF's should be scaled up in a way that puts combating antigypsyism at their core. Member States and Enlargement countries should include the fight against antigypsyism both as a stand-alone and as horizontal priorities in their NSF's. Furthermore, the horizontal measure on antigypsyism should articulate the need to develop preventive strategies by promoting awareness of Roma history, culture, recognition and reconciliation. Furthermore, they should:

- Link the national strategic frameworks to the national action plans against racism.
- Set ambitious targets fighting antigypsyism in all thematic areas, to be monitored on an annual basis.
- Promote the fight against antigypsyism in the public discourse and tackle the phenomenon in the access of goods and services, promotion and enjoyment of economic, civil, cultural and political rights both at structural and institutional level but also at individual level.
- Recognize antigypsyism as a specific form of racism with all its manifestations, as outlined by the European Commission and European Parliament, in national laws, policies and discourse. National governments should address and end any form of structural antigypsyism, including all forms of segregation, forced evictions, environmental injustice and other manifestations of antigypsyism/anti-Roma racism, including in education, employment, health and social protection and housing. They should ensure a rights-based approach and implementation of the Rule of Law that will strengthen the understanding of Roma as communities deprived of their rights rather than as vulnerable.
- Establish "truth and reconciliation committees" and/or "independent expert commissions on antigypsyism/anti-Roma racism" to address historic injustices such as forced sterilisations of Roma women, school segregation of Roma children and similar injustices based on the specific country context.
- Commemorate and protect sites of Roma memorials and establish monuments and memorials dedicated to Roma history.
- Develop awareness-raising strategies and measures promoting knowledge about Roma history, culture and identity in the narratives of European identity, history and culture. Reinforce the notion of and recognize Roma history, culture and heritage as part of the national ones and include Roma in school curricula and textbooks.
- Introduce positive narratives about Roma through awareness raising campaigns and promotion of Roma art,

culture, history and identity, by highlighting Roma achievements and contributions as well as the impact of Roma culture, art and history on the broader European identity, culture, art and history.

- Establish institutions and spaces that acknowledge, promote and support Roma arts, culture(s) and media productions. Support the establishment of cultural spaces and institutions where Roma art is visible and permanently exhibited. Establish and support Roma media outlets while supporting the inclusion of Roma in mainstream media.
- Promote and include Roma in the arts and culture institutions, initiatives, spaces of the majority population.
- Prioritize the best interest of children by putting an end to child violence, child-marriage, trafficking, sexual exploitation and segregation in education. End institutional care for children by starting a process of deinstitutionalisation through legislative and policy reforms at national level.
- Take steps to define segregation as illegal in housing and in education in national laws, in conformity with the International Convention on the Elimination of All Forms of Discrimination (ICERD), which condemns in Article 3 apartheid and racial segregation and obliges parties to 'prevent, prohibit and eradicate' these practices in territories under their jurisdiction and includes "an obligation to eradicate the consequences of past policies of segregation, and to prevent racial segregation arising from the actions of private individuals."
- Set clear, measurable objectives and measures related to the fight against discrimination, antigypsyist speech



and crime in line with the Framework Decision on combating racism and xenophobia by means of criminal law, the Race Equality Directive and the Country Specific Recommendations used in the framework of the European Semester.

- Implement the Code of Conduct on illegal hate speech more effectively.
- Address increasing complaints of alleged ill-treatment and ethnic profiling by police officers, including complaints with a possible racial motive. These should be investigated by a fully autonomous body outside the structures of the Interior Ministry or the police and sanctioned accordingly. Victims or witnesses of police ill-treatment should be provided with protection against harassment and victimisation.
- Address the inadequate access to justice of Roma, particularly Roma women, by facilitating their access to court and court proceedings at national and international level, including when on probation or in prison; providing free legal counsel and representation; improving free legal aid in all relevant types of

law (criminal, civil etc.); enhancing the capacities of legal professionals and law enforcement bodies to ensure unbiased police recordings and reporting, fair prosecution and court judgements and prevent violence and ill-treatment of Roma by police, the overrepresentation of Roma in prisons and further victimization of Roma.

- Ensure that all international and regional obligations related to the right to nationality, prevention of statelessness, protection of stateless persons, non-discrimination, and birth registration are fully incorporated into national law and effectively implemented in practice; guarantee the implementation SDG 16.9 by 2030 on legal identity for all, including universal, free and immediate birth registration for every child irrespective of the parents' status, documentation, or whether the child was born in a medical institution.
- Develop structural and impact indicators to measure progress in fighting antigypsyism/anti-Roma racism in their strategic frameworks in all key areas of education, employment, housing and health, in addition to social inclusion programmes. Indicators should also capture the most problematic forms of antigypsyism, such as hate speech, hate crime, school and residential segregation, structural and environmental racism, lack of access to high-quality public services and inter-ethnic tensions and racist police violence.
- Establish a formal mechanism to regularly analyse and assess the impact of laws and regulations regarding anti-discrimination and of policy decisions on public finances, economy, environment and gender equality, following for example Germany's monitoring and information body on antisemitism.
- Monitor and sanction the dissemination of misinformation, hate speech online and offline and the scapegoating of Roma by the media, politicians or public figures, including the ethnicising of crimes allegedly committed by Roma in the public discourse.
- Combat antigypsyism and negative stereotyping of Roma in the academia, school textbooks and educational materials through development of Roma inclusive and non-discriminatory teaching materials at all levels of education.
- Recognise important dates which are part of the Roma history and culture, such as 8 April – International Roma Day; 16 May -Roma Resistance Day; 2 August – Roma Holocaust Memorial Day and 5 November – Roma Language Day.

## Sectoral priorities



### EDUCATION

**Member States and Enlargement countries should go much above the targets set by the European Commission in the area of preschool, primary and secondary education. States should ensure full implementation of the SDGs for Roma children, youth, men and women by 2030, i.e. ensure equitable access to quality mainstream education for all Roma children and increase the enrolment and completion rate of Roma in quality integrated primary education to 90%, and in secondary education to 50%.**

More specifically, Member States and Enlargement countries should:

- Fully implement, by 2030, UN Sustainable Development Goal 4 on Quality Education for Roma, and implement principle 1 of the European Pillar of Social Rights, by adopting inclusive education measures – having at their core desegregation, teacher awareness, and including Roma history and culture in the school curricula. This includes specifically:

➤ By 2030, ensure that all Roma girls and boys complete free, equitable and quality primary and secondary education leading to relevant and effective learning outcomes.

- By 2030, ensure that all Roma girls and boys have access to quality early childhood development, care and pre-primary education so that they are ready for primary education.
- By 2030, ensure equal access for all Roma women and men to affordable and quality technical, vocational and tertiary education, including university.
- By 2030, substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship.
- By 2030, eliminate gender disparities in education and ensure equal access to all levels of education and vocational training for the vulnerable, including persons with disabilities, indigenous peoples and children in vulnerable situations.
- Build and upgrade education facilities that are child-, disability- and gender-sensitive and provide safe, non-violent, inclusive and effective learning environments for all.
- By 2030, substantially increase the supply of qualified teachers, including

through international cooperation for teacher training.

- By 2030, introduce or further extend free, obligatory preschool and remove financial and non-financial barriers to access.
- By 2030, invest in second chance schools and the recognition of non-formal qualifications, to ensure that people, particularly the most vulnerable, have access to lifelong learning opportunities.
- Invest in school infrastructure and quality of educational service in schools in or near-by Roma neighbourhoods.
- Acknowledge segregation as illegal, by amending their legislation in conformity with ICERD and RED and have zero tolerance against segregation in education reflected as such in targets in the NFS.

- Systematically monitor and end school and class segregation or misdiagnosis of Roma children, build explicit desegregation programmes and revise national law on education, where relevant.

- Promote quality, inclusiveness and positive results in education through incentives (funding and reform of teacher training), attracting the best teachers to disadvantaged schools/regions.
- Use ESIF and IPA resources to invest primarily into sustainable structural changes in the education system, rather than in the daily operation of the schools, i.e. the development of inclusive education and teacher training as conditions for an effective desegregation policy.
- Assess the impact of Covid-19 pandemic consequences on the educational process of Roma students and include their needs in the mainstream policies regarding digital education. Invest in supportive remote learning equipment (computers/tablets), access to the internet and digital literacy for vulnerable Roma students and ensure that EU emergency funds allocated for tackling COVID-19 specifically reflect the needs of Roma and vulnerable children.
- Provide additional targeted support for those who need it: hire and train sufficient school mediators and school assistants to support teachers and educators; provide majority language support to all students and after-hours support with homework, including to those working from home (in times of emergency and beyond).
- Ensure that school authorities do not apply disproportionate or discriminatory measures towards Roma students during Covid-19 crisis (e.g. justify poor grading or suspension of Roma students because of failure to comply with long distance learning because their families lacked the technology). Ensure that all children receive financial, social, pedagogical and psychological support during and after the pandemic to handle

its effects on education and mental health.

- Ensure free meals or food vouchers for all children in kindergarten and primary education both within the school setting and at home, depending on situations.
- Ensure free transportation for Roma children living in rural areas and far from their nearest kindergarten and primary schools.
- Encourage mobility of Roma students and access to mainstream traineeships programs both in the public and private sector.
- Ensure transnational collaboration of social and educational institutions across EU Member States to facilitate access of EU Roma children who exercised their right to freedom of movement, including by removing structural obstacles that hamper their access to schools and vocational training institutions (e.g. through easing of registration procedures of EU mobile Roma children).
- Develop strategies directed at protection, promotion and development of Romani language through teaching and publishing activities. Consider the use of Romani language in official documents and public communications.
- Ensure the teaching of Romani language and history in schools, including about the Holocaust and slavery of Roma across States. Invest in schoolbooks and teaching materials with the support of Roma scholars and civil society.
- Tackle school dropouts of Roma girls and boys throughout primary and secondary education by addressing the underlying causes and obstacles to Roma students not being able to attend school on a regular basis, including poverty and social marginalisation, early marriages, discrimination or a lack of a school's commitment towards Roma students.
- Include antigypsyism experienced by children in NRFs, its consequences on the learning performance and ways of tackling it through access to inclusive educational systems.
- Support the overall improvement of inclusive and multicultural education by addressing bias of schoolteachers and parents towards Roma and by developing school curricula including educational materials on Roma culture, history, art and language.
- Address anti-bullying measures and anti-Roma bias among teachers within school legislation and accompanied by inclusive and anti-discrimination teacher training.
- Monitor enforcement action taken by school inspectorates and provide further powers to such authorities as needed.
- Bring together all stakeholders: Roma and non-Roma pupils, Roma and non-Roma parents, school staff, local authorities, civil society, to identify and implement positive solutions.



## EMPLOYMENT

Member States and Enlargement countries should:

- Aim to increase the Roma employment rate equally for men and women in the public sector to 75%, equivalent to the proportion of Roma in the overall population (the current target is at 60% for men only). 75% of the Roma population aged 20 to 64 should be in quality and sustainable work, also by overcoming the gender gap in the labour force.
- Fully implement, by 2030, UN Sustainable Development Goal 8 on Decent Work and Economic Growth, as well as most principles of the European Pillar of Social Rights dealing with access to quality and sustainable employment (particularly 2 on gender equality, 4 on active support to employment, 5 on secure and adaptable employment, 6 on wages, 7 on information about employment conditions and protection in case of dismissals, 8 on social dialogue and involvement of workers, 9 on work-life balance, 10 on healthy, safe and well-adapted work environment and data protection, 13 on unemployment benefits, 15 on old age income and pensions, 17 on inclusion of people with disabilities), by ensuring that the Roma have access to decent jobs with adequate pay, security, and employment rights.
- End structural racial discrimination against Roma women and men in the access to employment and in the workplace by supporting the full implementation of the Racial Equality (2000/43/EC), Employment Equality (2000/78/EC) and Recast (2006/54/EC) Directives. States, public administrations and the private sector should make sure that positive narratives of diversity in the workplace are promoted and provide anti-discrimination training for public employment services, employers, and staff; sanction any occurrence of discrimination; invest in adapted workplaces and reward diversity employers.
- Ensure that Public Employment Services have the necessary resources (staff, training, platforms) to adequately support Roma jobseekers in a personalised way, rooted in a comprehensive Active Inclusion approach, including enabling services and adequate income support, and developed with the full ownership of the beneficiaries.
- Invest in infrastructure at local level in Roma settlements encouraging local employment and strategies that can address the needs the Roma community as professionals and job seekers.
- Strengthen measures supporting initial work experience or providing on-the-job training, including apprenticeships, internships, entry-level positions, social

economy, subsidised and adapted workplaces, lifelong learning, access to opportunities for progression by using the full potential of the European Social Fund (ESF). It can promote the use of the Microfinance and Social Entrepreneurship axis of the EaSI programme and thereby target Roma explicitly to improve their access to microfinancing.

- Promote adequate statutory minimum wages at a level of at least 60% of median wages, complemented by the reference budgets methodology; support wage transparency and gender-neutral job evaluations as key means to combat the ethnic and gender pay gap and discrimination in remuneration and wage bargaining.
- Regularise informal work: make sure seasonal jobs, craftsmen, artists or small business entrepreneurs and self-employed persons are covered by employment contracts giving access to decent work rights. Create employment and entrepreneurship support schemes addressing the needs of the informal workers and their informal businesses by supporting their smooth transition to the state employment system and providing them with specific measures such as tax incentives and technical and legal assistance and support.
- Use public employment schemes as a temporary solution for unemployment as an opportunity for re-qualification and further training.
- Support skills training for the Roma population, particularly women, and thus encourage employment in the private, public and third sectors, access to finance and adequate social protection

to promote self-employment and special measures from which Roma-owned businesses could benefit, such as tax incentives.

- Make youth employment a priority in NSFs and secure separate employment conditions for young Roma who face severe exclusion and discrimination on the labour market solely due to their ethnicity.

- Develop and secure economic measures during the Covid-19 crisis and provide financial aid to vulnerable groups working in the informal economy or those affected by lockdowns. Set up specific provisions to ensure that income support is also accessible for vulnerable groups, such as those without the online or transport means to apply for it, those without a bank account, or unable to read or write, market sellers, day labourers, entrepreneurs, artists and musicians, etc. Ensure that previous debt does not limit access by Roma to social benefits rolled out as a response to the pandemic.





## HEALTHCARE AND SOCIAL PROTECTION

**Member States and Enlargement countries should include targets and indicators on health care in line with the SDGs and the European Pillar of Social Rights, beyond the proposed EC target on life expectancy.**

Furthermore, they should:

- Ensure universal health insurance coverage among Roma at a level of at least 95% and reduce the disproportionate exposure of Roma to public health and environmental harms.
- Ensure the achievement of the principles of the European Pillar of Social Rights, particularly 10 on healthy, safe and well-adapted work environment and data protection, 15 on old age income and pensions, 16 on health care, 17 on inclusion of people with disabilities, 18 on long-term care and 20 on housing and assistance for the homeless of the Social Pillar.
- Ensure achievement of SDG 3 on good health and wellbeing, SDG 6 on clean water and sanitation, SDG 7 on affordable and clean energy, SDG 10 on reduced inequalities and SDG 16 on peace, justice and strong institutions for Roma by 2030, particularly:
  - By 2030, reduce the global maternal mortality ratio to less than 70 per 100,000 live births.
  - By 2030, end preventable deaths of new-borns and children under 5 years of age, with all countries aiming to reduce neonatal mortality to at least as low as 12 per 1,000 live births and under-5 mortality to at least as low as 25 per 1,000 live births.
  - By 2030, combat hepatitis, water-borne diseases and other communicable diseases.
  - By 2030, ensure universal access to sexual and reproductive health-care services.
  - Achieve universal health coverage, including financial risk protection, access to quality essential health-care services and access to safe, effective, quality and affordable essential medicines and vaccines for all.
  - By 2030, substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination.
  - By 2030, achieve universal and equitable access to safe and affordable drinking water for all.
  - By 2030, achieve access to adequate and equitable sanitation and hygiene for all and end open defecation, paying special attention to the needs of women and girls and those in vulnerable situations.
  - By 2030, improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials, halving the

proportion of untreated wastewater and substantially increasing recycling and safe reuse globally.

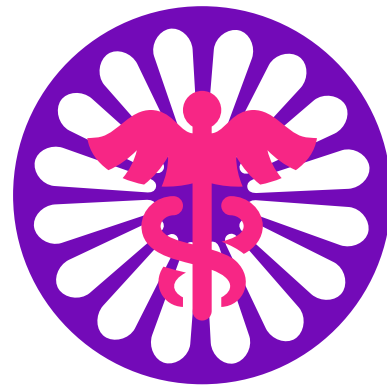
- By 2030, ensure universal access to affordable, reliable and modern energy services.
- By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status.
- Ensure equal opportunity and reduce inequalities of outcome, including by eliminating discriminatory laws, policies and practices and promoting appropriate legislation, policies and action in this regard.
- Adopt policies, especially fiscal, wage and social protection policies, and progressively achieve greater equality.
- Facilitate orderly, safe, regular and responsible migration and mobility of people, including through the implementation of planned and well-managed migration policies

- End abuse, exploitation, trafficking and all forms of violence and torture of children.

- Improve Roma women's access to quality medical check-ups, screening, prenatal and postnatal care, counselling and family planning, as well as sexual and reproductive healthcare, as generally provided by national healthcare services.
- Prevent and eliminate ethnically segregated healthcare services, ensure reparations for victims of forced sterilization and sanctions for doctors and perpetrators of forced sterilizations.
- Invest in and improve healthcare services and healthcare buildings in and near Roma communities and settlements. Ensure a non-discriminatory access to ambulance access and emergency health care in Roma settlements.
- Address the prevention and fight against drug addiction, HIV, hepatitis, tuberculosis, non-communicable diseases, including cancer and cardio-vascular diseases, premature birth, with an emphasis on harm reduction.
- Condemn and fight all forms of discrimination and exclusion from healthcare services. States must establish effective sensitising, monitoring and reporting mechanisms for countering discriminatory practices in access to education and health services, both physical and mental.
- Reinforce and scale-up health mediators' schemes and introduce them where they do not yet exist. Roma health mediators must be recognised as professions in the official registry and paid adequately according to their work and the value they bring.
- Prioritise access to health insurance and access to testing services, user-friendly public health information and vaccination or immunization against Covid-19 for Roma over 45 years of age; this is vital as the life span of Roma

across Europe is 10 to 15 years lower than of the majority population and therefore earlier delivery of a preventive plan is essential to prevent health complications and deaths among Roma. Improve and ensure a close cooperation of Roma health mediators with the Roma community.

- Implement mass vaccination programs, not only for Covid-19 but also for other diseases, as the pandemic measures will likely increase the number of non-vaccinated Roma children.
- Authorities should ensure that during emergency situations Roma in poor settlements have access to food, medicine, hygiene products and health care, and that they are supported to comply with public health measures in a manner that respects their human rights.
- Ensure improved nutrition and healthy diets to reduce obesity; and fight unhealthy living conditions targeting Roma women and families with minor children in order to provide children with optimal conditions for their physical and psychological development.



- Provide Roma with disabilities or long-standing illness with available support schemes (income, services, adapted housing and workplaces, care etc) without discrimination. Strive to improve the overall quality, accessibility, and affordability of such services for all.
- Support an independent living approach to long-term care, promoting deinstitutionalisation while ensuring that the burden of care does not fall on relatives.
- Adopt laws explicitly recognising the human right to water and sanitation and ensure that Roma community members and vulnerable groups enjoy the same level of safety and protection as non-Roma and have access to affordable, clean water, sanitation, food supplies and information, even in situations of informal housing conditions; adopt policies and allocate budgets for connecting Roma settlements to public drinking water and sewerage systems.

## HOUSING<sup>5</sup>



**Member States and Enlargement countries must fully implement principle 19 of the European Pillar of Social Rights, regarding Housing and assistance for homeless, to ensure that quality, affordable housing is accessible also to Roma. Under SDG 11 (Sustainable Cities and Communities), which states as an objective “Make cities and human settlements inclusive, safe, resilient and sustainable” and Article 13 of the European Social Charter and Articles 30 and 31 of the revised Social Charter, governments have an obligation to promote effective access to a range of services, including housing, and to promote access to housing of an adequate standard, to prevent and reduce homelessness with a view to its gradual elimination, and to make the price of housing accessible to those without adequate resources.**

More specifically, governments should:

- Ensure that within the NSFs and general policy and legal framework of housing policies integrated and appropriate housing policies and measures targeting Roma are developed with priority to guarantee adequate housing to all Roma families.
- Regulate and put in practice the concept of “adequate housing” for all citizens, including Roma, as defined in Paragraph 60 of the United Nations Habitat Agenda, and General Comments No. 4 and 7 of the UN Committee on Economic, Social and Cultural Rights (CESCR). The definition of “adequate housing” should form the basis for all other housing standards. It includes that: “Adequate shelter means more than a roof over one’s head. It also means adequate privacy; adequate space; physical accessibility; adequate security; security of tenure; structural stability and durability; adequate lighting, heating and ventilation; adequate basic infrastructure, such as water-supply, sanitation and waste-management facilities; suitable environmental quality and health-related factors; and adequate and accessible location with regard to work and basic facilities: all of which should be available at an affordable cost”.
- Map the housing situation of Roma and develop comprehensive policies on housing, relevant for both sedentary and itinerant Roma people. Within this framework, governments should prioritize funding and investment in long-term housing solutions and infrastructure, including access to water supply and safe water, sanitation, garbage collection and electricity, but also education, medical care, social support, etc. especially in the context of Roma vulnerability under Covid-19. This is also an opportunity to invest in green sustainable housing.

<sup>5</sup> “Housing” in these Recommendations includes different modes of accommodation, such as houses, caravans, mobile homes or halting sites.



- Find innovative solutions to address inadequate, overcrowded housing conditions. Poor housing conditions represent a systemic risk for the impacts of health crises, requiring a longer-term government response to build resilience.
- Covid-19 recovery efforts must include temporary suspension of mortgage payments and utility bills, and suspension of forced closing of utility service and evictions for families at risk as a result of the pandemic and ensure temporary housing for the homeless. Guarantee a moratorium (cancellation) on all forced evictions during the pandemic and confinement measures and find temporary alternative accommodation for those already evicted.
- Legalise informal settlements where Roma live; alternatively, provide permanent, decent, affordable and desegregated housing for Roma currently living in informal settlements that cannot be legalized for justified reasons.
- Affirm and ensure the right of people to pursue sedentary or nomadic lifestyles, according to their own free choice, by making available to them all conditions necessary in accordance with the legal framework relating to building, planning and access to private land. Resolve the undefined legal status of Roma settlements as a precondition for further investments. Where Roma camp illegally, public authorities should use a proportionate response, including negotiation with all parties in order to avoid Roma from being excluded from access to services and amenities to which they are entitled as citizens.
- Through Europe's commitment to a socially just green transition, governments must also tackle the environmental hazards that Roma face. Significant Roma communities across Europe live close to waste dumps, while many Roma settlements face pollution and environmental degradation stemming from landfills, contaminated sites, or dirty industries. A new policy focus on environmental justice must include the disproportional exposure of Roma to environmental degradation, pollution and natural hazards, the denial of environmental services, as well as the relationship between environmental degradation in segregated settlements and poor health outcomes. The SDGs should be used to prioritise participatory planning and urban regeneration, as well as air quality and waste management. At municipal level, this can include desegregation, refurbishing houses for better energy efficiency and sanitation, and the upgrading of public spaces.
- Take measures to combat any forms of segregation and integrate a new policy focus on environmental justice, in particular regarding the disproportional exposure of Roma to environmental degradation, pollution and natural hazards, the denial of environmental services, as well as the relationship between environmental degradation in segregated settlements and poor health outcomes. Invest in the development of safe locations and taking steps to

ensure that Roma families have practical and affordable housing alternatives, so as to discourage settlements in, near or on hazardous areas.

- Establish a legal framework in line with international human rights standards, to ensure effective protection against unlawful forced and collective evictions and to control strictly the circumstances in which legal evictions may be carried out. In the case of lawful evictions, Roma must be provided with appropriate alternative accommodation, if needed. Legislation should also strictly define the procedures for legal eviction, and such legislation should comply with international human rights standards and principles, including those articulated in General Comment No. 7 on forced evictions of the UN CESCR. Such measures shall include consultation with the community or individual concerned, reasonable notice, provision of information, a guarantee that the eviction will be carried out in a reasonable manner, effective legal remedies and free or low-cost legal assistance for the persons concerned. The alternative housing should not result in further segregation.
- Undertake, through their relevant authorities, a systematic review of their housing legislation, policies and practices and remove all provisions or administrative practices that result in direct or indirect discrimination against Roma, regardless of whether this results from action or inaction on the part of state or non-state actors. They should establish adequate mechanisms to ensure compliance with anti-discrimination laws and allow for participation of Roma representatives and NGOs at all stages of monitoring.
- Ensure that anti-discrimination laws prohibit gender-based discrimination, directly or indirectly, in the supply of goods and services, including housing. Member states should also foster housing policies addressing the needs of Roma women, and in particular single mothers, victims of domestic violence and other categories of disadvantaged Roma women; the relevant authorities should ensure that access to social housing is provided to them, taking into consideration their urgent needs and by capping rents and property prices for family dwellings.
- Make available free legal aid, advice and representation related to the denial of housing rights to Roma living in poverty in order to ensure that their ability to protect their rights or seek effective remedy, including judicial redress against denial of housing rights, is not undermined by the lack of legal aid mechanisms.
- Establish appropriate monitoring mechanisms to ensure the effective implementation of housing policies and practices for Roma. Roma representatives should be involved on an equal footing in any monitoring and evaluation process. Support NGOs also by providing for the legal conditions to regulate NGOs' activities in the field of housing.
- Ensure that housing-related projects are financed from national public budgets as well as from EU and other funds and be administered through a network of partners at local, regional, national, and transnational level. Make use of the possibilities, including loans and expertise offered by international financial institutions in favour of Roma housing projects, such as the Council of Europe Development Bank, the World Bank, the European Bank for Reconstruction and Development, as well European Union programmes.



## EQUALITY BODIES AND HUMAN RIGHTS INSTITUTIONS

**Member States and Enlargement countries should ensure independence of equality bodies and human rights institutions through their administrative structure, budget allocation, procedures for appointing and dismissing staff and preventing conflicts of interest and broader mandate and powers.**

A limited mandate and powers of equality bodies can affect their capacity to engage in effective litigation. The mandate of a number of equality bodies does not cover the functions of the police, which is problematic given the issues raised by Roma in their interactions with the police in many jurisdictions. Limitations in the powers of equality bodies include also that the lack of legally binding decisions, the lack of powers to bringing a case to court or the inability to gather data on the specific ethnic identity of complainants and thus the lack of detailed data and evidence on Roma complainants both for their judicial and policy work.

- Governments should ensure that equality bodies have the necessary human, technical and financial resources and infrastructure. They should also promote representation of Roma and other vulnerable groups in the structures of the equality bodies and human rights institutions. This is especially important for Western Balkan countries and countries with a larger Roma population. They should also encourage Roma traineeship in equality and judiciary bodies.
- Governments should enable equality bodies to handle individual or collective complaints, provide legal assistance

and represent victims or organisations in court.

- They should enable more equality bodies to work to a multi-ground mandate to allow action on issues of relevance to a number of the protected discrimination grounds in a multi-ground manner. This will allow equality bodies to capture intersectional issues and prevent further stigmatisation of Roma.
- Sufficient human and financial resources and capacities should be invested in equality bodies so that they are able to address antigypsyism and discrimination against Roma, including to pursue strategic litigation and including own-initiative casework; address under-reporting of Roma and enhance their access to justice; respond to, prevent, and secure more effective action against hate speech and hate crime against Roma; collaborate with Roma and civil society organisations, including initiatives to build trust and engage in mutual education; provide policy advice on improving the living conditions and life experience of Roma communities and pursue its implementation; and conduct research to enable deeper knowledge of the situation and experience of Roma communities to inform policy responses.