

ROMA INDEX

**Capacity Building for Roma and Traveller
Civil Society Organisations to use
the Council of Europe Standards and Mechanisms
for Promoting Rights of Roma and Travellers**

COMPLETE OVERVIEW OF 20 COE MEMBER STATES 2024-2025



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1. INTRODUCTION

This report examines the implementation of Council of Europe (CoE) standards on Roma and Traveller inclusion and rights protection across twenty member states, with a focus on two phases of the RIPE initiative.

The first phase launched in 2024 and covered **Albania, Bulgaria, Czechia, Germany, Greece, Italy, North Macedonia, Romania, Slovakia, and Spain**. The second phase extends the analysis to ten additional countries: **Croatia, France, Hungary, Ireland, the Republic of Moldova, Montenegro, Poland, Serbia, Türkiye, and Ukraine**. The comparative approach facilitates cross-country analysis, tracks progress over time and aligns with the Council of Europe Strategic Action Plan for Roma and Traveller Inclusion (2020–2025)[1], which underscores the importance of standardised data collection to assess developments, identify gaps, and inform policy.

The analysis highlights recurring patterns of fragmented, short-term, and insufficiently institutionalised measures. Despite formal commitments and the existence of legal and policy frameworks, implementation frequently remains uneven, particularly in areas such as desegregation, housing reform, anti-hate speech enforcement, and protection for Roma women and girls.

Civil society continues to fill critical gaps in monitoring, service provision, and advocacy, compensating for limited state capacity or political will to address structural antigypsyism.

Persistent deficiencies, including inadequate data governance, limited Roma participation in decision-making, under-resourced local authorities, and the absence of clear accountability mechanisms, undermine the impact of existing strategies. These trends emphasise the need for coherent, coordinated, rights-based action that moves beyond pilot projects and declaratory commitments toward sustained, measurable, long-term investment in Roma and Traveller inclusion.

This report also provides a unique comparative perspective by linking desk research, civil society input, and monitoring recommendations from CoE bodies such as the European Commission against Racism and Intolerance (ECRI), the Advisory Committee on the Framework Convention for the Protection of National Minorities (FCNM), the Committee of Experts on Roma and Travellers Issues (ADI-ROM), GRETA, GREVIO, and the Council of Europe Commissioner for Human Rights. The analysis is complemented by a review of national strategic frameworks, European Commission assessments, Fundamental Rights Agency (FRA) data where available, and relevant civil society reports.

[[1] Council of Europe Strategic Action Plan for Roma and Traveller Inclusion (2020–2025): <https://rm.coe.int/coe-strategic-action-plan-for-roma-and-traveller-inclusion-en/16809fe0d0>

2. METHODOLOGY AND LIMITATIONS

The methodological framework of this report is structured to ensure comparability across countries and to integrate multiple sources of information. The research draws on three main approaches:

a) Desk research: Comprehensive analysis of publicly available publications, monitoring reports, and assessments between 2021 and 2024. Desk research focused on national strategic frameworks, CoE monitoring cycles, and civil society documentation. Where recent monitoring reports were unavailable for certain countries, earlier cycles (e.g., Fifth- or Sixth-cycle ECRI reports) were consulted.

b) Civil society engagement: Questionnaires and surveys were administered to national civil society representatives (National Roma Focal Points) in each of the countries under review. The surveys were designed to capture observations on the implementation of national strategic frameworks and CoE recommendations. In total, 23 national Focal Points participated in both phases, with kick-off meetings providing detailed guidance on completing the questionnaire. The quality of responses varied, necessitating supplementary desk research to ensure balanced and comprehensive reporting.

c) Transparency and validation: Draft factsheets were shared with National Roma Contact Points (NRCPs) to verify factual accuracy^[1], while prioritising the independent perspectives of civil society contributors. Cross-referencing multiple credible sources helped mitigate bias and strengthen the reliability of findings.

Several limitations affected the scope and depth of this analysis:

Variation in questionnaire responses:

Contributions from civil society varied in detail, ranging from comprehensive assessments to basic yes/no answers. This required additional desk research to fill gaps.

Time constraints: Limited timelines reduced opportunities for extensive engagement and iterative feedback with Focal Points, which may have affected the granularity of responses.

Data availability: Reporting quality and accessibility varied significantly between EU Member States and Western Balkan countries. Certain countries, such as France and Türkiye, have not ratified the FCNM, limiting the availability of comparable monitoring data.

Scope of monitoring reports: Official reports often lacked detailed information on the implementation and effectiveness of specific measures, particularly in areas such as education, housing, employment, and protection for Roma women and girls. Desk research and civil society input were used to supplement these gaps.

Cross-country comparability: Differences in the availability of FRA data, GRETA and GREVIO reports, and national documentation limited the ability to generalise findings across all countries, particularly in relation to Roma women and girls.

Despite these limitations, the methodology ensures a robust, comparative, and multi-dimensional analysis of Roma and Traveller inclusion policies and practices. By integrating desk research, civil society perspectives, and monitoring recommendations, this report provides stakeholders with a comprehensive understanding of progress, gaps, and priorities for action across different regional and institutional contexts.

^[1] During the first phase of RIPE, an initial draft of the Civil Society questionnaire was shared with the National Roma Contact Points, but none of them responded. Based on this outcome, it was concluded that the initiative did not add value to the reporting process, and it was therefore discontinued in the second phase.

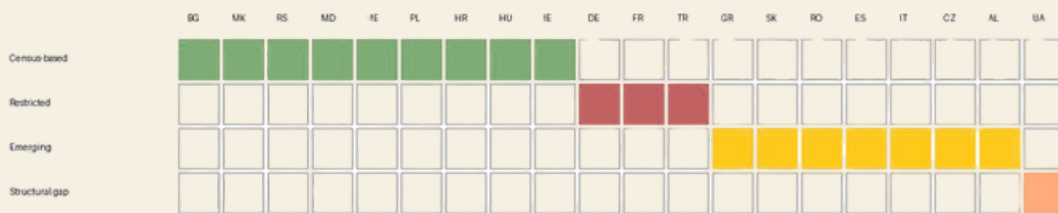
3. DATA COLLECTION

Reliable, rights-compliant data collection remains a cornerstone for understanding and addressing the situation of Roma and Travellers across Europe. The Council of Europe’s monitoring bodies have consistently underlined this point. ECRI’s General Policy Recommendation No. 13[1] calls on member States to develop sound data systems capable of capturing the realities faced by Roma in key areas such as education, employment, housing and health, while strictly upholding the principles of confidentiality, informed consent and voluntary self-identification.

The Advisory Committee[2] has further clarified that any collection of information on ethnic, national or religious affiliation—whether in census exercises or other statistical tools—must follow internationally recognised data-protection standards and avoid assumptions or indirect inferences about identity. Most recently, Recommendation CM/Rec (2024) of the Committee of Ministers[3] emphasises the importance, where appropriate and in dialogue with those concerned, of collecting sex-disaggregated data on Roma and Traveller women and girls.

Against this normative background, desk research and civil society input confirm that data collection practices vary significantly across the 20 countries covered, both in terms of legal frameworks and in practical implementation.

Figure 1: Data collection practices vary significantly across the 20 countries covered



[1] ECRI, General Policy Recommendation No. 13 on combating antigypsyism and discrimination against Roma: [ECRI, General Policy Recommendation No. 13 on combating antigypsyism and discrimination against Roma](#)

[2] Advisory Committee on the Framework Convention for the protection of National Minorities, Thematic Commentary No. 4 The Scope of Application of the Framework Convention for the Protection of National Minorities, 26 May 2016, [ACFC/56DOC\(2016\)001](#)

[3] Available at: [Recommendation CM/Rec\(2024\)1 of the Committee of Ministers to member States on equality of Roma and Traveller women and girls](#)

Countries with census-based ethnic data collection

Several countries include ethnicity as a voluntary self-identification category in national censuses, generally in line with international standards. This is the case, inter alia, in **Bulgaria, North Macedonia, Serbia, Moldova, Montenegro, Poland, Croatia, Hungary and Ireland**. These systems allow for the periodic production of disaggregated data on Roma, often further broken down by sex, age and region.

In **BULGARIA**, the Advisory Committee[1] considers that, despite concerns expressed by minority representatives, the 2021 census methodology largely aligns with European and international standards. ECRI, however, continues to call for more comprehensive, gender-disaggregated Roma-specific data, particularly in the areas of education, employment, housing and health. A positive development is the FRA-supported national Roma data collection (BNSI/FRA 2020), which enables international comparability.

In **NORTH MACEDONIA** [2], the collection of disaggregated data through the census is underway, with ongoing efforts to achieve full alignment with EU and international standards.

In **SERBIA**, while ECRI[3] and the Advisory Committee[4] have repeatedly highlighted the absence of systematically used ethnically disaggregated administrative data, the Statistical Office included ethnic self-identification questions in both the 2011 and 2022[5] censuses. As a result, gender-disaggregated census data on Roma now exist across education, employment, housing and health, although their systematic use for policy design and monitoring remains limited.

A key limitation across all census-based systems remains the **periodicity of data collection**, the high proportion of “not declared” responses, and the **absence of continuous administrative equality data**, which restricts the capacity for real-time monitoring of progress.



[1] Advisory Committee, Fifth Opinion on Bulgaria, <https://rm.coe.int/5th-op-bulgaria-en/1680b1c747>

[2] RIPE National Roma Focal Point, Questionnaire 2024

[3] ECRI Sixth monitoring report on Serbia, 2024: <https://rm.coe.int/fourth-ecri-report-on-serbia/1680b06413>

[4] Advisory Committee on the Framework Convention for the protection of national minorities, Fifth Opinion on Serbia, 2025: <https://rm.coe.int/acfc-op-v-2024-5-5th-cycle-opinion-on-serbia-en/488028728e>

[5] Statistical Office of the Republic of Serbia (SORS), Census of Population, Households and Dwellings 2022 – Ethnicity, Religion and Mother Tongue, available at: <https://data.stat.gov.rs/Home/Result/3104030101?languageCode=en-US&displayMode=metadata>

Countries with limited or evolving systems

Several countries fall between these two models, either lacking explicit legal provisions on equality data or operating fragmented systems that are still under development. This group includes **Greece, the Slovak Republic, Romania, Spain, Italy, Czechia and Albania.**

In **ITALY**, national legislation allows—but does not require—the National Equality Body to conduct statistical surveys.[1] Some efforts are underway to establish more reliable equality data, but the system remains partial and unsystematic.[2]

In **CZECHIA**, the absence of comprehensive equality data significantly hampers the evaluation of Roma inclusion policies. The Advisory Committee notes persistent reluctance among persons belonging to minorities to declare ethnic affiliation due to fear of stigmatisation.[3] A landmark 2024 ruling of the European Committee of Social Rights[4] confirmed that the lack of sufficient data on the overrepresentation of Roma children in state care constitutes indirect discrimination, reinforcing the legal obligation to strengthen data collection frameworks.

In **ALBANIA**, ECRI and the Advisory Committee[5] have repeatedly stressed the importance of conducting the census in a transparent manner and in line with international standards, including through awareness-raising on free self-identification and multiple affiliation. A positive administrative development is the ROMALB[6] electronic system that supports the reporting of Roma inclusion indicators by trained officials, although it does not yet compensate for the lack of comprehensive equality data.

In **GREECE, ROMANIA, SLOVAKIA, and SPAIN**, there are no explicit legal prohibitions on the collection of equality data, yet fully reliable and systematic disaggregated data systems are still under development.

A key limitation across all census-based systems remains the **periodicity of data collection**, the high proportion of “not declared” responses, and the **absence of continuous administrative equality data**, which restricts the capacity for real-time monitoring of progress.

Countries affected by structural or contextual constraints

In **UKRAINE**, census-based ethnic data exist, but the last full census was conducted in 2001 [7]. The 2023 census was cancelled due to martial law, leaving a major gap in up-to-date disaggregated data on Roma.

[1] European Commission, Analysis and comparative review of equality data collection practices in the EU, https://commission.europa.eu/system/files/2022-06/analysis_and_comparative_review_of_equality_data_collection_in_the_eu_-_legal_framework.pdf p96

[2] Available at: <https://fra.europa.eu/en/promising-practices/statistical-working-group-roma-population>

[3] Advisory Committee on the Framework Convention for the Protection of National Minorities, *Fifth Opinion on the Czech Republic*, 2019

[4] European Committee on Social Rights, *Decision on the merits* of the Complaint No. 190/2020 European Roma Rights Centre (ERRC) v. Czech Republic

[5] Advisory Committee on the Framework Convention for the Protection of National Minorities, *Fifth Opinion on Albania*, 2023

[6] The online system for the Action Plan monitoring and progress reporting, RomALB, has been developed and piloted in the period of 2015- 2017. The government with UNDP support worked to update this online system with new monitoring information from the Action Plan and continues to raise capacities for its use

[7] RIPE, National Roma Focal Point, Questionnaire 2025

Comparative assessment

Across the 20 countries, three broad models can be identified:

1. **Census-based voluntary ethnic data systems** (e.g. Bulgaria, North Macedonia, Serbia, Hungary), which provide periodic but non-continuous data.
2. **Restrictive legal or constitutional models** (e.g. Germany, France, Türkiye), where ethnicity-based data collection is either prohibited or extremely limited.
3. **Emerging or fragmented systems** (e.g. Italy, Czechia, Albania, Greece, Romania, Spain), where equality data collection is allowed in principle but not yet institutionalised.

Despite consistent standards, recommendations, and, in some cases, binding court rulings, **significant structural gaps in Roma-related data collection persist across Europe.** While promising practices exist—particularly in countries with census-based ethnic self-identification—these remain insufficient for continuous monitoring, targeted policy design and robust evaluation of outcomes.

At the same time, countries with constitutional or legal restrictions continue to face major evidence gaps, limiting the effectiveness of Roma inclusion strategies.

Overall, the findings confirm the need for **country-specific guidance, strengthened data governance frameworks, and sustained dialogue with Roma communities** to establish reliable, rights-based, and policy-relevant data collection systems capable of supporting real progress towards equality.



4. NATIONAL STRATEGIES, ACTION PLANS AND PROGRAMMES: DESIGN, FUNDING, IMPLEMENTATION, MONITORING AND CONSULTATION

The 2020 amended ECRI's General Policy Recommendation No. 13^[1] recommends that the governments of member states employ, under a national plan, a comprehensive multidisciplinary approach to issues concerning Roma, involving their representatives in the conception, framing, implementation and evaluation of the policies that concern them. The Recommendation CM/Rec(2024) of the Committee of Ministers to member States on equality of Roma and Traveller women and girls,^[2] asks the member states to develop strategies, action plans and budget lines for the implementation of this recommendation that contain clear and measurable goals, indicators, baselines and targets, and define responsible institutions and timelines for reaching each goal, in consultation with Roma and Traveller communities and organisations, especially in connection to Roma and Traveller women and girls.

Following the structure of the ECRI monitoring factsheet—covering adoption, design and funding, implementation, monitoring and accountability, and consultation mechanisms—this comparative analysis across 20 countries shows that **formal alignment with European policy standards is now almost universal, yet substantial differences persist in the quality, ambition and effectiveness of implementation**. These differences are driven less by the absence of strategies and more by **political commitment, administrative capacity, funding reliability, and the strength of local and regional engagement**, all of which remain decisive in translating policy into measurable outcomes.

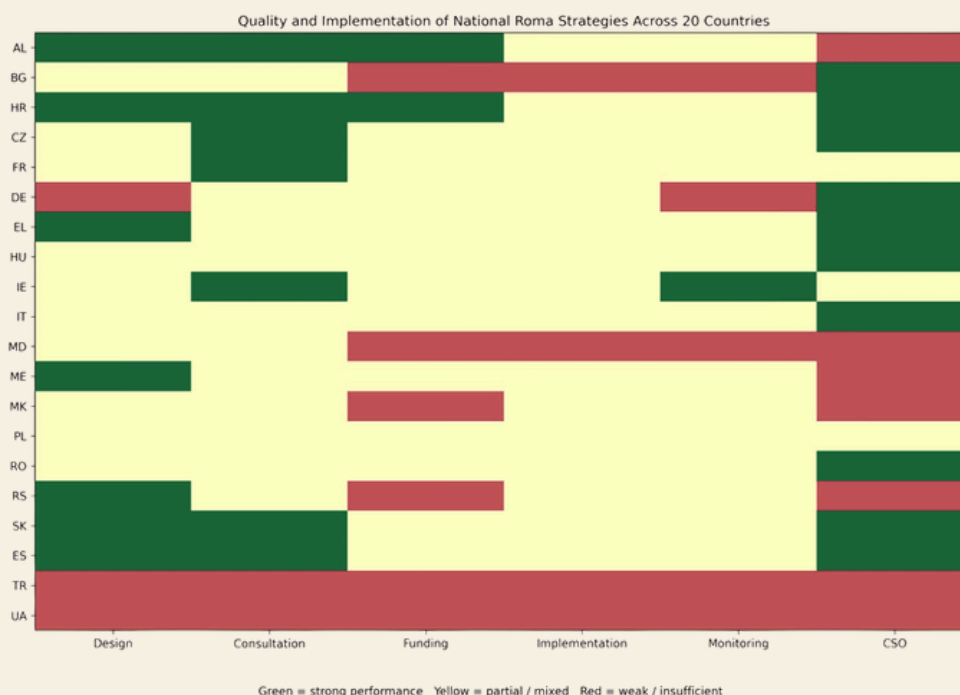
Across all 20 countries covered by this analysis—Albania, Bulgaria, Croatia, Czechia, France, Germany, Greece, Hungary, Ireland, Italy, the Republic of Moldova, Montenegro, North Macedonia, Poland, Romania, Serbia, the Slovak Republic, Spain, Türkiye and Ukraine—**comprehensive national Roma strategies, action plans or detailed programmes are now formally in place**. These frameworks generally address the core priority areas of education, employment, housing, health and anti-discrimination. This represents significant progress in terms of policy architecture.

However, the **operational strength, territorial reach and outcome orientation of these frameworks vary substantially**, with important gaps remaining in indicators, funding, monitoring and accountability.

[1] [ECRI GPR No. 13, cited above](#)

[2] [Advisory Committee on the Framework Convention for the Protection of National Minorities, Fifth Opinion on North Macedonia, 2022](#)

Figure 1: Data collection practices vary significantly across the 20 countries covered



Design Quality: Indicators, Baselines, Targets and Timetables

A structural weakness across both the EU and enlargement countries remains the uneven quality of indicator systems. Countries such as **Croatia, Montenegro, Serbia, Greece, the Slovak Republic, Albania and Spain** have invested more seriously in establishing indicators, baseline values and targets, in some cases aligned with the FRA portfolio of indicators.

In contrast, **Bulgaria, Czechia, France, Hungary, Ireland, Italy, Moldova, North Macedonia, Poland and Romania** have developed only partial or insufficient indicator systems that do not yet capture the scale and complexity of Roma exclusion. **Germany, Türkiye and Ukraine** have made very limited progress in establishing measurable frameworks.

The absence of robust baselines and quantified targets continues to severely constrain **outcome-oriented monitoring and evaluation**, making it difficult to assess real progress beyond reporting on activities.

Consultation and Participation

All 20 countries have introduced consultation mechanisms during the drafting of their national strategies. However, the **depth, inclusiveness and territorial reach of participation differ markedly**. **Croatia, France, Ireland, Czechia, Spain, the Slovak Republic and Albania** demonstrate comparatively stronger and more inclusive consultation practices.

In **Bulgaria, Hungary, Moldova, Montenegro, North Macedonia, Poland, Romania, Serbia, Germany and Türkiye**, consultations are formally in place but remain insufficiently inclusive, particularly at local and regional levels.

In **Ukraine**, consultation has been minimal or absent.

Across the region, **persistent concerns remain regarding the limited involvement of grassroots Roma organisations**, especially outside capital cities, and the **insufficient participation of Roma women and young people** in strategic decision-making.

Funding and Financial Sustainability

Funding remains one of the most structurally fragile dimensions of national Roma frameworks. Adequate or relatively stable national funding is clearly reported only in **Albania and, to a certain extent, Croatia**. Most countries—including **Bulgaria, France, Hungary, Ireland, Italy, Moldova, Montenegro, North Macedonia, Poland, Romania, Serbia, the Slovak Republic and Spain**—operate with **mixed or insufficient funding**, often heavily dependent on EU instruments or international donors. **Türkiye and Ukraine** report **no stable or clearly allocated budget lines** for Roma strategies.

Even where strategies are comparatively well-designed, chronic underfunding at the municipal level remains a recurring bottleneck, particularly in **Moldova, Montenegro, Bulgaria, Serbia, and North Macedonia**, directly undermining effective local implementation.

Implementation Capacity and Local Governance

Across both EU and enlargement countries, **local and regional authorities play a decisive role but frequently lack resources, technical expertise and political incentives**. While positive institutional practices exist—such as municipal Roma units in **North Macedonia** and local action plans in **Moldova and Montenegro**—weak administrative capacity and uneven political ownership at the local level remain structural obstacles.

Political instability and the COVID-19 pandemic further disrupted implementation in several countries, notably **Bulgaria, Montenegro, Moldova, Serbia and Ukraine**.

Monitoring, Accountability and Evaluation

All countries except Germany have formally established monitoring and accountability mechanisms for their national Roma strategies. **Germany** relies primarily on external reporting mechanisms rather than a dedicated national monitoring structure. However, **only Ireland assesses its monitoring system as functioning satisfactorily**. In all other countries, monitoring mechanisms suffer from **limited scope, weak feedback loops and insufficient linkage between evaluation findings and policy correction**. This severely weakens accountability and learning processes.

Roma Civil Society Participation in EU Funds Monitoring

Participation of Roma civil society organisations in the monitoring and evaluation of EU funding programmes is uneven. Roma CSOs are involved in evaluation committees in **Bulgaria, Croatia, Czechia, Germany, Greece, Spain, Hungary, Italy, Romania and the Slovak Republic**. In **Albania, Moldova, Montenegro, North Macedonia, Serbia, Türkiye and Ukraine**, Roma CSO participation is absent, either due to institutional design or an inconsistent approach. In **France, Ireland and Poland**, involvement remains limited. This restricts **community-driven oversight of financial implementation** in several countries.

Consideration of the COVID-19 Pandemic

The integration of COVID-19 impacts into Roma strategies is uneven. **Albania, Croatia, Czechia, France, Greece, Hungary, Ireland, Montenegro, North Macedonia, Romania, the Slovak Republic and Spain** explicitly acknowledge pandemic-related vulnerabilities and introduce at least partial responses. In **Bulgaria, Germany, Italy, Moldova, Poland, Serbia, Türkiye and Ukraine**, pandemic impacts are either insufficiently reflected or addressed only in general terms, often failing to reach the most vulnerable Roma communities.

Country Practice Illustrations

The case of **NORTH MACEDONIA** illustrates both progress and structural limits. The Strategy for Inclusion of Roma 2022–2030[1] formally acknowledges the need for accelerated implementation and includes a participatory methodology. During initial consultations, civil society organisations reported that Roma involvement in the design phase remained insufficient.

Positive institutional arrangements exist, including the National Contact Point, the National Coordination Body and the specialised Roma Project Unit in Tetovo, which is staffed entirely by Roma and funded through the municipal budget. However, civil society actors continue to raise concerns about donor dependence and the limited scale of direct state financing.

In **BULGARIA**, the National Strategy for Equality, Inclusion and Participation of the Roma 2021–2030 is formally in place, with links between national, regional and municipal plans. Yet political instability, COVID-19 disruption, insufficient local resources and weak baseline data continue to undermine effective implementation.

While civil society participation in EU monitoring committees has improved, and funding complementarity is formally ensured, the lack of measurable targets in the Action Plan significantly weakens accountability[2].

In **CROATIA**, the National Plan for Roma Inclusion 2021–2027 is widely regarded as one of the strongest frameworks, with progress reported in education, housing, employment, anti-discrimination and cultural preservation.

Strong coordination and civil society consultation mechanisms are in place, although sustained implementation remains dependent on continued political commitment and inter-institutional cooperation[3].

In **MONTENEGRO**, the Strategy for 2021–2026 is partially state-funded and focuses explicitly on Roma and Egyptian women and children. However, weak awareness and engagement at the municipal level continue to hinder local delivery[4].

In **MOLDOVA**, national and local action plans exist, but many municipalities lack the funding and technical capacity to implement them[5]. The Advisory Committee has repeatedly stressed the need for sustainable financing and gender-sensitive monitoring[6].

[1] Strategy for the Inclusion of Roma, <https://www.rcc.int/romaintegration2020/files/admin/docs/ec401e5c4bf3d348990512774b419ffc.pdf>

[2] ECRI, Sixth Report on Bulgaria, 2022 [ECRI, Sixth Report on Bulgaria, 2022](https://www.ecri.org/~/media/ECRI/Files/2022/Sixth-Report-on-Bulgaria-2022.pdf)

[3] ECRI Sixth report on Croatia, 2025: <https://rm.coe.int/sixth-report-on-croatia/1680b65f43>

[4] ECRI Report on Montenegro, 2025: <https://rm.coe.int/third-report-on-montenegro/488029120c>

[5] ECRI Report on the Republic of Moldova, Sixth Monitoring Cycle, 2024: <https://rm.coe.int/sixth-report-on-the-republic-of-moldova/1680b2097e>

[6] Fifth opinion on the Republic of Moldova, Advisory Committee on the Framework Convention for the protection of national minorities, 2023: <https://rm.coe.int/5th-op-moldova-en/1680acf5c8>

CONCLUSIONS:

Across all 20 countries, national Roma strategies and action plans are now almost universally in place, reflecting strong **formal alignment with EU and Council of Europe policy frameworks**.

However, this analysis confirms a **persistent implementation gap**, driven by weak indicator systems, chronic underfunding—especially at the local level—uneven and often insufficient Roma participation, and limited accountability mechanisms that fail to link evaluation to policy correction.

While promising institutional practices exist in countries such as Croatia, Montenegro, Serbia, Ireland and parts of North Macedonia, **the overall effectiveness of national Roma strategies remains constrained by structural weaknesses in governance, financing, monitoring and local delivery capacity.**

Without strengthened outcome-oriented indicators, predictable funding, empowered local authorities, and genuinely participatory consultation mechanisms, national Roma strategies will continue to struggle to deliver durable, measurable improvements in the living conditions and rights of Roma communities across Europe.



5. PREVENTION (AWARENESS-RAISING CAMPAIGNS, MEDIA ENGAGEMENT) AND EMPOWERMENT

The 2020 amended ECRI's General Policy Recommendation No. 13^[1], recommends that the governments of member states combat antigypsyism expressed in the media while acknowledging the principle of their editorial independence. At the same time, it asks the governments to enhance mutual trust between Roma and public authorities, in particular by training mediators from, among others, the Roma community.

The Recommendation CM/Rec(2024) of the Committee of Ministers to member States on equality of Roma and Traveller women and girls,^[2] asks the Member States to take appropriate measures to encourage and support civil society organisations, the media, political parties, regional and local authorities and other stakeholders to adopt the measures that are outlined in the principles and guidelines appended to this recommendation.

To this end, political parties and civil society organisations should work with the media and journalists with a view to ensuring that media reporting on Roma and Traveller women and girls is free from stereotypes and sexism and that the media promote Roma and Traveller women who are involved in political and public life as role models.

Article 6(1) of the Framework Convention^[3] also underscores the media's role in promoting intercultural understanding and a sense of solidarity in society. Given the immediate amplification of messages and values, the Advisory Committee has consistently called on states parties to ensure that public broadcasters take their responsibilities seriously and promote respect for diversity and ethical journalism in all their programmes. Moreover, within the Thematic Commentary No. 1 on Education under the Framework Convention for the Protection of National Minorities^[4], high importance is placed on the role of mediators in areas such as education, healthcare and employment.



[1] ECRI GPR No. 13, cited above

[2] Recommendation CM/Rec(2024)1, cited above

[3] See [Framework Convention for the Protection of National Minorities](#)

[4] Thematic Commentary No. 1 on Education under the Framework Convention for the Protection of National Minorities.

Figure 4: Prevention and empowerment measures across the 20 countries:



Across the 20 countries examined, the comparative analysis reveals a **highly fragmented landscape**. While **Roma mediator schemes represent the most consistently developed and institutionalised preventive tool**, other areas—particularly **structured media engagement, anti-bullying policies, empowerment of Roma organisations and sustained awareness-raising**—remain uneven, project-based and insufficiently embedded in public policy.

Systematic state-led strategies to counter **antigypsyism in the media** are generally weak or inconsistent. Countries such as **Croatia, Ireland, and Montenegro** have developed some structured engagement with journalists through training initiatives, ethical guidelines, and awareness campaigns. In contrast, measures in **Bulgaria, Czechia, Hungary, Poland, Serbia, Spain, Slovakia, Moldova, and Ukraine** tend to be sporadic and NGO-driven. **France, Germany, Greece, Italy, Romania, and Türkiye** show very limited or no evidence of systematic media strategies. Public broadcasters typically perform better than private outlets, yet self-regulatory mechanisms alone have proven insufficient to prevent antigypsyist narratives. In several countries, the normalisation of antigypsyism in public discourse remains a serious concern, with recurring racist incidents, derogatory reporting, and hostile political rhetoric documented in **Hungary, France, Greece, and Spain**.

Awareness-raising campaigns and intercultural dialogue involving Roma communities remain uneven and largely dependent on NGOs or international donors. Countries with documented Roma participation include **Croatia, Montenegro, Hungary, Serbia, Moldova, Ireland, Italy, North Macedonia, and Czechia**, while **Albania, Germany, Poland, Slovakia, Spain**, and **Ukraine** show limited engagement. In **France, Greece, Romania, and Türkiye**, there is little to no evidence of Roma involvement in such initiatives. The lack of permanent state programmes raises questions about sustainability and national coverage.

Anti-bullying measures targeting Roma children and youth are rare. Although all countries maintain general anti-bullying frameworks, only **Germany, Ireland, Poland, Hungary, Croatia, Romania, and Serbia** have systems potentially reaching Roma pupils, while isolated Roma-focused pilots exist in **Montenegro, Moldova, and Ukraine**. Many countries—including **Albania, Bulgaria, Czechia, Greece, Italy, North Macedonia, Slovakia, Spain, France, and Türkiye** lack Roma-specific anti-bullying measures, limiting early prevention of discrimination and intergenerational exclusion.

Support for municipalities, essential for effective local-level prevention and empowerment, varies widely. Institutionalised municipal capacity-building exists in **Croatia, Ireland, Montenegro, Greece, and Slovakia**, while **Albania, Bulgaria, Czechia, North Macedonia, Poland, Romania, Serbia, and Spain** show uneven support. **France, Germany, Italy, and Türkiye** offer very limited central support, and **Moldova and Ukraine** remain largely donor-dependent. Weak municipal capacity undermines the local delivery of preventive and empowerment measures.

Roma mediator schemes represent the most advanced and widely implemented preventive mechanism. Well-established or expanding programmes exist in **Croatia, Hungary, Poland, Serbia, Montenegro, France, and Ireland**. In **Moldova and Ukraine**, mediation relies heavily on donor support, while in **Türkiye** it remains fragmented and short-term. Sectoral imbalances are evident, with mediators strongest in health and education, and employment mediation often weak or absent. Despite their recognised effectiveness, mediator schemes frequently lack stable long-term funding and professional certification frameworks.

The empowerment of Roma civil society organisations remains uneven and structurally fragile. **Croatia, Montenegro, Ireland, and Serbia** provide structured support and formal consultative roles, whereas **Poland, Hungary, Moldova, Bulgaria, Slovakia, Greece, Italy, and Czechia** offer more limited support. In **France, Germany, Romania, Spain, and Türkiye**, state-supported empowerment is weak or very limited, and in **Ukraine**, civil society activity is constrained by war-related instability and resource shortages. Regular dialogue mechanisms between authorities and Roma CSOs exist in many countries, with **Croatia, Ireland, Montenegro, Poland, Hungary, Serbia, Albania, Bulgaria, Spain, Romania, Slovakia, Italy, Greece, and Czechia** hosting more stable consultative forums. In **Germany, Moldova, and Ukraine**, dialogue is under development or inconsistent, while **France, Türkiye, and North Macedonia** have weakly institutionalised forums. In most cases, dialogue remains consultative rather than co-decisional, limiting its impact on policy direction.

Overall, the analysis shows that Roma mediator schemes are the only consistently scaled and institutionalised preventive mechanisms across Europe. Media engagement to counter antigypsyism, structured awareness-raising, Roma-specific anti-bullying policies, municipal capacity-building, and empowerment of Roma organisations remain uneven, underfunded, and weakly institutionalised. Despite strong normative guidance from ECRI, the Framework Convention, and the Committee of Ministers, prevention and empowerment continue to rely disproportionately on NGOs and donor-funded projects rather than on stable public policy frameworks.



The findings underline the urgent need for **systematic, well-resourced, and long-term preventive approaches**, grounded in meaningful **Roma participation** and supported by accountable public institutions at both national and local levels.

6. INCLUSIVE EDUCATION (NON-SEGREGATED EDUCATION, SCHOOL ATTENDANCE AND COMPLETION) – COMPARATIVE ANALYSIS

One of the objectives of the Council of Europe Strategic Action Plan for Roma and Traveller Inclusion (2020-2025^[1]) is to promote and protect the human rights of Roma and Travellers, including through supporting access to inclusive quality education and training.

As regards combating antigypsyism in education and culture, the EU/Council of Europe Joint Project “Inclusive Schools: Making a Difference for Roma Children (INSCHOOL)^[2]” has piloted this concept in five countries by building the capacity of schools to respond to the specific needs of Roma children, to celebrate difference and to support their learning experience. The ECRI's General Policy Recommendation No. 13^[3] recommends that the governments of member states combat antigypsyism in the field of education, and accordingly take measures for preventing and combating stereotypes, prejudice and discrimination experienced by Roma children in schools; take urgent measures, including legal and political ones, to put an end to the segregation at school which Roma children are subjected to; abolish the too-frequent placement of Roma children in special schools, and take all appropriate measures to combat absenteeism and dropping-out among Roma children.

Moreover, the Recommendation CM/Rec(2024) of the Committee of Ministers to member States on equality of Roma and Traveller women and girls^[4] asks the member states to take appropriate measures to ensure, including through national or specific education strategies, that early childhood education and care institutions, primary and secondary schools, vocational training centres and higher education institutions take effective special measures to ensure the equal participation of Roma and Traveller girls in quality education. This should include measures to increase their enrolment, attendance and achievements, while avoiding any school segregation on ethnic or other grounds.

Furthermore, according to Article 12(3) of the Framework Convention, equal opportunities for access to education at all levels for persons belonging to national minorities must be promoted. Given the specific link to Article 4 and the general principle of equality, the Advisory Committee has consistently encouraged a broad and inclusive approach, also referring to the United Nations Convention on the Rights of the Child. Accordingly, the Advisory Committee has strongly condemned all instances of segregated education and has urged states parties to take all necessary measures to ensure equal access to integrated education for all children. In addition, Article 14(1) makes provision for the right to learn one's minority language, while Article 14(3) stresses the right to learn or be taught in the official language or languages.^[5]

[1] Cited above

[2] Available at: <https://pjp-eu.coe.int/en/web/inclusive-education-for-roma-children>

[3] Cited above

[4] above

[5] Available at: <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016806a481>

Across both country groups, **Roma children continue to face disproportionate exposure to segregated schooling, misplacement in special education, language barriers, poverty-related exclusion and hate-motivated bullying.** FRA survey data[1] confirm that in several EU Member States, more than half of Roma children attend schools or classes where most pupils are also Roma, with particularly high segregation rates recorded in **Slovakia, Bulgaria, Romania, Hungary and Czechia.** Hate-motivated bullying remains widespread, affecting around one in five Roma children, with particularly high levels reported in **Italy and Czechia.**

Figure 5: Inclusive education overview across the 20 countries

Country	Segregated Schooling	Special School Misplacement	Early School Leaving /	Bullying / Discrimination	Early Childhood & Language Barriers
Hungary	Very High	Very High	High	Medium	High
Czechia	Very High	Very High	Medium	High	High
Slovakia	Very High	Very High	Medium	Medium	Very High
Romania	High	High	Very High	Medium	High
Bulgaria	High	High	Very High	Medium	High
Croatia	High	Low	Medium	Low	High
Greece	High	Low	Very High	Medium	Medium
Italy	Medium	Low	Very High	High	Medium
France	Low	Low	Medium	Medium	Medium
Ireland	Low	Low	Medium	Low	Medium
Türkiye	Medium	Low	Medium	Low	High
Moldova	Medium	Low	Medium	Low	High
Ukraine	Medium	Low	Medium	Low	High
Poland	Medium	Low	Medium	Low	Medium
Serbia	Medium	Medium	High	Medium	High
Montenegro	Medium	Medium	High	Medium	High
Albania	Medium	Low	High	Medium	High
Germany	Low	Low	Medium	Medium	Medium
North Macedonia	Medium	Medium	High	Medium	High
Spain	Low	Low	Medium	Medium	Low

[1] Rights of Roma and Travellers in 13 European countries - Perspectives from the Roma Survey 2024, <https://fra.europa.eu/en/publication/2025/roma-survey-2024>

Persistent Structural Segregation

In multiple countries, **segregation operates through a combination of residential separation, discriminatory school catchment practices, misdiagnosis of intellectual disability, and majority parental “school flight.”** This is well documented in:

CZECHIA, where segregation increased from 29% in 2016 to 58% in 2024^[1], and where Roma children continue to be overrepresented in special schools despite repeated ECtHR judgments^[2] and EU infringement proceedings. For example, the European Commission initiated infringement proceedings against the Czech Republic for discrimination against Roma under the Race Equality Directive in September 2014^[3]. Discrimination was manifested by overrepresentation of Romani children in schools and classes for pupils with mild mental disabilities, where they amount to over a third of the pupils.

In May 2024, the European Committee of Social Rights issued a landmark ruling against the Czech Republic, acknowledging that the lack of sufficient data collection on the overrepresentation of Romani children in the country’s state care constitutes indirect discrimination. This binding ruling is the result of a complaint filed jointly by the European Roma Rights Centre (ERRC) and the Forum for Human Rights (FORUM) in early 2020.^[4] As a signatory and ratifier of the European Social Charter and its Optional Protocol, the Czech Republic is bound to comply with this decision. The corrective measures are collective, focusing on policy-level changes rather than individual reparations. The Czech Republic must demonstrate that it has addressed its lack of ethnic data collection on children in state care by collecting such data or using alternative methods.

SLOVAKIA, where Roma children remain disproportionately placed in special schools due to biased psychological diagnostics, leading to the European Commission’s decision to refer Slovakia to the Court of Justice of the European Union for failing to effectively tackle the issue of segregation of Roma children in education.^[5]

The EU rules on racial equality (Directive 2000/43/EC) strictly prohibit discrimination on grounds of ethnic origin in key areas of life, including education. In Slovakia, however, Roma children are often placed in special schools for pupils with mild mental disabilities. Many Roma children who attend mainstream education are also segregated, in separate classes or schools.



[1] FRA Roma Survey 2025

[2] European Court of Human Rights in its judgment D.H. and others v. the Czech Republic.

[3] 2024 European Commission Assessment report on Roma

[4] Available at: <https://www.errc.org/press-releases/czech-republics-failure-to-collect-data-on-romani-children-in-state-care-ruled-a-violation-of-european-social-charter>

[5] Available at: https://ec.europa.eu/commission/presscorner/detail/en/ip_23_2249

HUNGARY, where segregation has risen to 62% despite extensive litigation, Court judgments have confirmed these patterns of discrimination: the Debrecen Appeal Court and later the Kúria^[1] upheld compensation for Roma pupils segregated in Gyöngyöspata^[2], although subsequent legislation now restricts monetary compensation in education discrimination cases. ECRI also notes that the ECtHR's Horváth and Kiss judgment^[3] on the misplacement of Roma children in special schools remains unimplemented. It calls on the authorities to end all forms of de facto segregation, drawing on domestic case law, the Deputy Commissioner's General Comment on Gyöngyöspata^[4], and ECRI's own GPR No. 13.^[5] Despite all the above, new research by the Rosa Parks Foundation reveals^[6] how existing practices result in "an unjustifiably high proportion of Roma children being diagnosed with mild intellectual disability"; exposes how the diagnostic process leaves a wide scope for biases, subjective diagnoses, and misdiagnosis, all the while excluding Romani parents from participation.

In **CROATIA**, more than half of Roma pupils still attend de facto segregated classes. The Advisory Committee^[7] highlights that positive steps have been taken to implement the Oršuš and Others v. Croatia judgment^[8], and the National Roma Inclusion Strategy includes measures such as free preschool, additional Croatian-language tuition, and transport to reduce segregation risks. Moreover, regarding specific measures to address the complex issue of segregation, the European Commission, in its 2024 Assessment report, notes that, as a promising practice, Croatia's 2023–2025 action plan includes measures to reduce the share of Roma children attending segregated primary school education. The programme for desegregation in education at the regional and local levels for 2023–2025 was adopted in October 2023.^[9]

BULGARIA, ROMANIA, GREECE and ITALY continue to face repeated court rulings and international scrutiny for persistent ethnic segregation in education.

In member states (**France, Türkiye, Moldova, Ukraine**), segregation is less systematically mapped but remains structurally embedded through **territorial exclusion, weak early childhood participation and limited Roma-specific anti-discrimination enforcement**.

[1] Kúria, Decision No. Pfv.IV.21.556/2019/22, 12.5.2020. Kúria also issued a communiqué rejecting the idea of in-kind compensation (which is a legal remedy only available upon the agreement of the parties).

[2] Debrecen Regional Court of Appeal; no. Pfv.I.20.123/2019/16, 18.9.2019.

[3] Horváth and Kiss v. Hungary (no. 11146/11, 29.1.2013); ECRI (2015): §§ 111–113.

[4] On 15 April 2021, the Deputy Commissioner for the Rights of Nationalities Living in Hungary ('nemzetiségi biztoshelyettes') issued a General Resolution in connection to their investigation concerning the education and child protection problems of a Roma student with special needs and found that the responsible schools in Mosonmagyaróvár failed to provide the legally required accommodating and supportive measures to the student in question.

[5] ECRI's General Policy Recommendation No. 13 on combating antigypsyism and discrimination against Roma.

[6] Segregation in Special Education, last updated September 2024, https://www.rosaparks.hu/wp-content/uploads/2024/11/tanoda_kutatasi-jelentes_1118_online_ENG.pdf

[7] Advisory Committee, Fifth Opinion on Croatia, 2021: <https://rm.coe.int/5th-op-croatia-en/1680a2cb49>

[8] ECtHR (2010). Croatia was found to be in violation of the Convention for placing Roma children in segregated Roma-only classes due to their limited command of the Croatian language. The Committee of Ministers of the Council of Europe closed this case in November 2017, as the main measures had been adopted

[9] European Commission, Roma Assessment Report, 2024: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=COM:2024:422:FIN>

Early Childhood Education and Language Barriers

Early childhood education and care (ECEC) is widely recognised as a key entry point for inclusion, yet **Roma access remains uneven and often conditional on parental employment, documentation status or municipal discretion**. While:

- **Czechia, Slovakia, Hungary, Croatia** and Ireland have expanded kindergarten capacity and introduced compulsory preschool years,
- CSO and monitoring data consistently show that **Roma children still enrol later, attend less regularly, and often begin school without adequate instruction in the language of teaching**, particularly in Slovakia, Croatia and Hungary.

Language barriers, combined with the absence of systematic Roma language support or Slovak/second-language learning modules, continue to reinforce early tracking into low-quality education or special schools.

Drop-Out, Transition Gaps and Gender Disparities

While primary school enrolment has improved in several countries, **transition to and completion of secondary education remains extremely weak**, particularly for Roma girls. Croatia, Hungary, Bulgaria, Romania, Greece and Italy report steep drop-out rates between ages 12–18, contributing directly to high NEET rates and long-term labour market exclusion. Scholarship schemes and transport support exist in some countries, but **these remain compensatory rather than structural solutions** and fail to address root causes such as poverty, discrimination and segregated school environments.

School Mediation and Roma Teaching Assistants

Roma school mediators and teaching assistants are one of the **few consistently applied inclusion tools** across both country groups, notably in **Croatia, France, Ireland, Hungary, Poland, Serbia, Montenegro and Moldova**.

However, their **institutional status, remuneration, training and coverage remain weak and uneven**, with many positions dependent on short-term project funding. In **Türkiye**, despite references in the national strategy, **school mediation is not institutionalised**.

Policy Measures: Present but Weakly Enforced

While nearly all countries formally acknowledge school segregation in their national strategies, **very few have adopted operational, time-bound and enforceable desegregation plans**. Instead, policy responses typically consist of:

- Broad strategic references to inclusion (**France, Poland, Türkiye, Ukraine**),
- General education reforms combined with limited desegregation training (**Czechia**),
- Intercultural education approaches without enforcement tools (**Greece**),
- Early childhood and allowance-based support without structural desegregation (**Ireland, North Macedonia**),
- Definitions of segregation without effective prevention mechanisms (**Slovakia**).

In **Albania, Germany, Italy and Romania**, this analysis could not identify any dedicated, systematic state-led desegregation programmes targeting Roma pupils.

Litigation, Infringements and Systemic Non-Compliance

Across the 20 countries, **education remains the single most litigated area of antigypsyism**, with:

- Ongoing or recent EU infringement proceedings against **Czechia, Slovakia and Hungary**.
- Repeated ECtHR judgments against **Croatia, Hungary, Czechia, Greece and others**.
- A landmark 2024 ruling by the European Committee of Social Rights against **Czechia** for indirect discrimination linked to the absence of ethnic data in child protection systems.

Despite this extensive legal pressure, implementation remains slow, **fragmented and politically contested**, with several governments actively weakening remedies (e.g. Hungary's ban on financial compensation in education discrimination cases).

Overall Comparative Assessment

Across all 20 countries, the analysis demonstrates that:

- **No country has yet implemented a fully systemic, rights-based desegregation model.**
- Most measures remain **project-based, under-resourced and weakly enforced**.
- **Early childhood expansion, mediators and targeted funding for disadvantaged schools** represent important entry points but **do not substitute for binding desegregation obligations**.
- **Monitoring, accountability and sanctions for segregation remain largely ineffective**, allowing discriminatory systems to persist despite formal policy commitments.



7. ACCESS TO HOUSING, SPATIAL SEGREGATION, DESEGREGATION AND SAFEGUARDS IN CONNECTION WITH EVICTIONS

The ECRI's General Policy Recommendation No. 13^[1] recommends that the **governments of member states combat antigypsyism as regards housing and the right to respect for the home, and accordingly afford Roma access to decent housing**; combat de facto or forced segregation in respect of housing; ensure that the provision of new social housing for Roma aids their integration and does not keep them segregated. In 2023, the protection of social rights was one of the priorities of the Council of Europe Commissioner for Human Rights^[2], both in her country-focused and in her thematic work, as the cost-of-living crisis in Europe continued, with more and more families affected by rising food and housing costs in particular.

The Recommendation CM/Rec (2024) of the Committee of Ministers to member States on equality of Roma and Traveller women and girls^[3] asks member states to take effective measures to ensure that they and their families are provided with adequate accommodation without discrimination. With regard to Traveller women and girls, a sufficient number of adequate, safe and culturally appropriately equipped halting sites and encampment areas that are not affected by residential segregation should be available. To that end, member states should ensure that Roma and Traveller women and their families have effective and equal access to social and other forms of housing and eliminate criteria for allocating social housing, which are apparently neutral but have a discriminatory effect on Roma and Traveller women. Furthermore, they should ensure that persons in situations of vulnerability, such as homeless and evicted Roma and Traveller women, are eligible and have priority access to social housing, including mobile accommodation. Moreover, Article 31 of the Charter – the right to housing requires States Parties to take measures designed to promote access to housing of an adequate standard.

Housing has also remained a **priority theme** in the work of the Council of Europe Commissioner for Human Rights amid the **cost-of-living crisis and rising housing insecurity**.



[1] Cited above

[2] Council of Europe Commissioner for Human Rights, *Annual Activity Report, 2023*

[3] Cited above

Figure 6: Access to housing across the 20 countries

Country	Spatial Segregation	Informal Housing / Eviction Risk	Evictions & Safeguards	Social Housing Access	Discrimination (Housing Market)
Bulgaria	Very High	Very High	Very High	High	Medium
Romania	Very High	Very High	Very High	High	Medium
Slovakia	Very High	Very High	Very High	High	Medium
Italy	Very High	Very High	Very High	Medium	High
Serbia	Very High	Very High	High	Medium	High
Ukraine	Very High	Very High	High	Very High	High
Türkiye	High	Very High	High	Medium	High
Hungary	High	High	Medium	Medium	Medium
Croatia	High	Medium	Medium	Medium	Low
Montenegro	High	High	Medium	Medium	High
Moldova	High	High	Medium	Medium	High
Greece	High	High	High	Medium	High
Czechia	High	Medium	Medium	Medium	Medium
Spain	Medium	Low	Low	Medium	Medium
France	Medium	High	High	Medium	High
Ireland	Medium	Low	Low	Medium	Very High
Germany	Low	Low	Low	Medium	High
Albania	Medium	High	Medium	Medium	High
North Macedonia	High	High	Medium	Medium	Medium
Poland	Medium	Low	Low	Medium	Medium

Structural challenges

Across the 20 countries covered by this analysis, Roma and Travellers continue to experience **systemic housing exclusion**, marked by:

- Persistent **substandard and segregated settlements**, often lacking access to water, sanitation, electricity, transport and emergency services.
- **High prevalence of informal or illegal housing**, particularly in Bulgaria, Italy, Romania, Serbia, Slovakia, Ukraine and Türkiye, exposing Roma to constant eviction risks.
- **Forced evictions without adequate safeguards**, legal remedies or rehousing solutions, reported prominently in Bulgaria, Italy, Romania and Slovakia.
- **Severe shortages of social and affordable housing**, combined with discriminatory eligibility criteria at the municipal level.
- **Discrimination in private rental markets**, documented in Ireland, Germany, France, Montenegro, Moldova, Serbia and Türkiye.
- **Weak or non-existent Roma participation in housing planning**, allocation and urban development processes.

These structural barriers reinforce spatial segregation and perpetuate intergenerational poverty, exclusion from education, healthcare and employment.

Overall Comparative Assessment

Countries with persistent large-scale informal settlements and eviction risks: Bulgaria, Italy, Romania, Serbia, Slovakia and Ukraine continue to report widespread informal Roma settlements exposed to demolitions, insecurity of tenure and homelessness. Bulgaria illustrates the systemic nature of this problem, with a very high proportion of demolition orders affecting Roma housing and limited legalisation options^[1]. Italy shows partial progress through local housing transition projects, but evictions and camps persist.

Countries with halting-site-based accommodation models: France and Ireland rely heavily on Traveller-specific halting sites and caravan infrastructure. Despite legal frameworks, severe shortages, poor infrastructure, environmental hazards and local resistance remain widespread. Recognition of caravans as housing remains unresolved.

Countries reliant on small-scale or donor-driven interventions: Croatia, Montenegro, Moldova, Serbia, Türkiye and Hungary depend significantly on project-based funding, often supported by donors or international organisations. These interventions remain fragmented, limited in scale and weakly embedded in sustainable national housing systems.

Post-conflict and crisis-affected context: Ukraine represents an extreme case where war-related displacement has dramatically worsened pre-existing housing exclusion of Roma, with widespread homelessness, discrimination in access to shelters and exclusion from recovery measures.

[1] ECRI, Sixth monitoring report on Bulgaria, <https://rm.coe.int/ecri-sixth-report-on-bulgaria/1680a83581>

Policy measures and implementation gaps

Seven EU Member States (**Bulgaria, Czechia, Greece, Spain, Italy, Romania and Slovakia**) report specific measures to tackle spatial segregation and use of EU funds for this purpose. These include social housing programmes, infrastructure upgrades and monitoring of segregated localities. However, across all countries:

- **Reliable, up-to-date data on segregated housing remains largely absent**, undermining monitoring and accountability.
- **Municipal discretion dominates housing allocation**, with no binding national safeguards against discriminatory criteria.
- **Social housing supply remains far below actual need**, even where programmes formally exist.
- **Legalisation of informal settlements is slow, partial or blocked by restrictive legislation**, particularly in Bulgaria, Italy, Romania and Serbia.
- **Private rental market discrimination is systematically unaddressed**, with almost no structured cooperation with landlords or enforcement mechanisms.
- **Roma participation in housing governance is minimal**, despite formal commitments in several national strategies.

Albania represents a relative exception through a more integrated approach combining legislative reforms, action plans with timelines and indicators, and measurable targets.

Litigation and enforcement trends

The housing situation of Roma remains under **enhanced supervision** by the European Committee of Social Rights following collective complaints in Bulgaria, Greece and Italy. The ECSR's 2023 findings^[1] confirm that **serious violations persist**, particularly regarding evictions, segregation and lack of adequate rehousing. The European Court of Human Rights judgment in *Yordanova and Others v. Bulgaria*^[2] remains emblematic of continued failures to align eviction practices with proportionality and housing safeguards. Strategic litigation and NGO monitoring, particularly by the European Roma Rights Centre, continue to document large-scale forced evictions, notably in Italy and Bulgaria, but with limited domestic follow-up or structural remedies.

CONCLUSIONS:

Across the 20 countries analysed, **housing remains one of the most structurally exclusionary policy areas affecting Roma and Travellers**. Despite universal formal recognition of the problem, progress remains **slow, uneven and largely insufficient to reverse entrenched segregation and insecurity**. Most States continue to rely on **local authority discretion, fragmented donor-supported projects and weakly enforced strategies**, without establishing binding national desegregation obligations, sufficient social housing supply, or effective safeguards against eviction and discrimination. Roma participation in housing governance remains marginal, and private-market discrimination is largely unregulated.

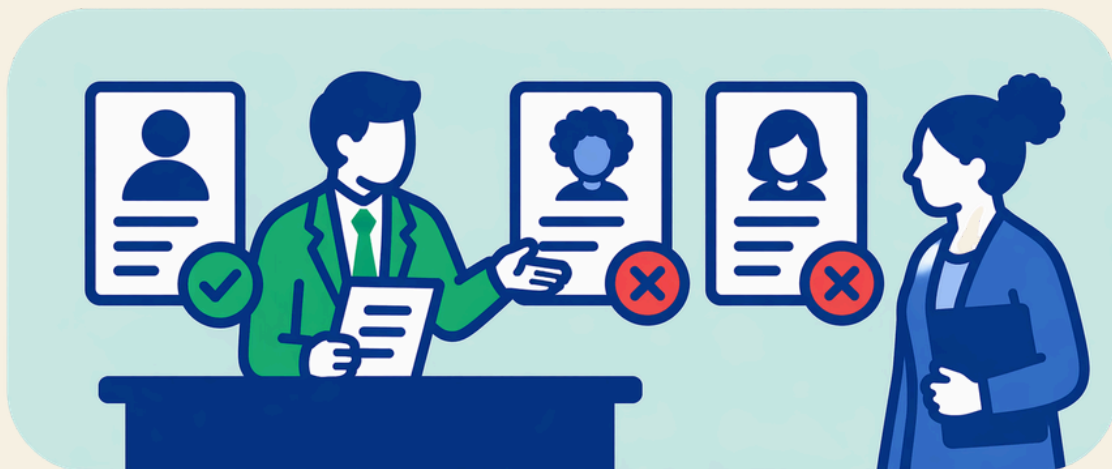
As a result, access to adequate, non-segregated and secure housing for Roma and Travellers remains **systemically constrained across the majority of countries**, with particularly acute risks linked to forced evictions, informal settlements and post-crisis displacement.

[1] European Committee of Social Rights publishes 2023 Findings and Conclusions on Children, Family and Migrants

[2] Available at: <https://hudoc.echr.coe.int/fre#%7B%22itemid%22%3A%22001-10449%22%7D>

8. EMPLOYMENT OPPORTUNITIES AND COMBATING DISCRIMINATION IN ACCESS TO EMPLOYMENT

The ECRI's General Policy Recommendation No. 13^[1] calls on the member states to combat antigypsyism in employment, and accordingly: **ensure that national legislation affords genuine protection against discrimination in employment and that it is indeed implemented;** for that purpose, provide adequate training to civil servants; take positive measures for Roma in respect of employment, as concerns particularly recruitment and vocational training, etc. At the same time, the European Social Charter guarantees a broad range of human rights, among which are employment, social protection and welfare^[2]. The Recommendation CM/Rec (2024) of the Committee of Ministers to member States on equality of Roma and Traveller women and girls,^[3] asks member states to address inequalities in employment and economic situation by taking efficient measures to raise awareness and ensure the respect of the right of Roma and Traveller women jobseekers to equal and non-discriminatory access to the labour market.



[1] Cited above

[2] [European Committee on Social Rights, Activity Report 2023](#)

[3] Cited above.

Figure 6: Access to housing across the 20 countries

Country	Unemployment / Inactivity	Job Quality & Public Works Dependence	Discrimination (Hiring & Workplace)	Policy Targeting	Implementation & Enforcement
Hungary	High	Very High	Very High	Medium	Very High
Serbia	Very High	Very High	High	Medium	Very High
Montenegro	High	Very High	High	Medium	Very High
Moldova	High	Very High	Medium	Medium	High
Croatia	High	High	Medium	Medium	High
Türkiye	Very High	Very High	High	Low	Very High
Ireland	Very High	Medium	High	Low	High
France	Very High	Medium	High	Low	High
Poland	High	Medium	Medium	Low	High
Ukraine	High	Medium	Medium	Low	High
Romania	High	Medium	High	High	High
Italy	High	Medium	High	High	High
Czechia	Medium	Medium	Medium	High	Medium
Albania	Medium	Medium	Medium	High	Medium
Greece	Medium	Medium	Medium	Medium	Medium
Spain	Medium	Low	Medium	Medium	Medium
North Macedonia	High	Medium	Medium	Medium	High
Germany	Low	Low	Medium	Low	Medium
Bulgaria	High	Medium	Medium	Medium	High
Slovakia	High	Medium	Medium	Medium	High

Structural challenges

Across the 20 countries covered by this analysis, Roma continue to face **persistent and structural exclusion from the labour market**, driven by the following interlinked factors:

- **Disproportionately high unemployment and inactivity**, particularly in Ireland, France, Serbia and Türkiye, but also widespread in Hungary, Moldova, Montenegro, Croatia, Poland and Ukraine.
- **Over-representation in low-quality, unstable or informal work**, including public works schemes, seasonal labour and street-based economic activities.
- **Low levels of educational attainment and vocational skills**, particularly among low-literate adults, severely limit labour-market competitiveness.
- **Widespread discrimination in recruitment and at the workplace**, combined with weak enforcement of equality legislation.
- **Low trust in public institutions and underreporting of discrimination**, documented notably in Poland, Romania, Hungary and Serbia.
- **Additional structural barriers for Roma women and youth**, linked to care responsibilities, early school leaving, poverty and gender discrimination.

These structural constraints produce a self-reinforcing cycle of labour-market exclusion that is only partially addressed by existing policy measures.

Country clusters and examples

Countries with extensive dependence on public works: Hungary, Serbia, Montenegro, Moldova, Croatia and Türkiye show heavy reliance on short-term public employment schemes, which provide temporary income but do not lead to sustainable labour-market integration. In Hungary, Roma remain concentrated in low-quality public works, with minimal transition into the open labour market.

Countries with targeted entrepreneurial and self-employment schemes: Romania, Italy and Czechia report dedicated entrepreneurship and self-employment programmes, including subsidised start-ups and training. Romania's Start-Up programme includes a Roma sub-component and long-term financing, but the overall impact on labour-market inclusion remains uneven.

Countries relying primarily on mainstream labour-market policies: Poland, France, Hungary, Ukraine and Croatia rely largely on general active labour market policies (ALMPs), with limited Roma-specific targeting, weak outreach to inactive Roma and no systematic anti-bias mechanisms.

Countries with emerging targeted local initiatives: Albania, Greece, Spain and North Macedonia report more focused local or youth-oriented measures, such as vocational training, job placement programmes, counselling and adult education centres. Albania stands out for combining public employment quotas, youth guarantees and entrepreneurship support, albeit still on a limited scale.

Policy measures and implementation gaps

Across the 20 countries, **most States report a broad range of employment-related measures**, including vocational training, job mediation, wage subsidies, entrepreneurship schemes, youth job placement and counselling programmes. However, major implementation gaps persist:

- **Targeted measures remain small-scale, fragmented and project-based**, often dependent on EU or donor funding rather than embedded in sustainable national systems.
- **Positive action in public-sector employment is largely absent**, with extremely low Roma representation in civil service across most countries. The labour market discrimination is also confirmed by the FRA Roma Survey data, which shows that 34% of Roma in Hungary reported experiencing discrimination when looking for a job – an increase from 26% in 2016.^[1]
- **Anti-discrimination enforcement remains weak**, with discrimination widely reported but rarely sanctioned in practice.
- **Private-sector employer engagement is limited**, with very few structured incentive schemes, tax benefits or anti-bias recruitment mechanisms.
- **Outreach to inactive, unregistered and informally employed Roma is weak**, particularly in Montenegro, Poland, Serbia, Hungary and Türkiye.
- **Roma participation in the design and monitoring of employment policies remains minimal** across most countries.

While Albania and Romania show comparatively stronger use of quotas, incentives and entrepreneurship support, even these remain insufficient to close structural employment gaps.

Litigation and enforcement trends

Labour-market discrimination against Roma remains **systematically underreported** across all countries. Monitoring bodies consistently identify:

- **Low awareness of rights and complaint mechanisms**, particularly in Poland and Romania.
- **Fear of retaliation and lack of trust in institutions**, notably in Hungary, Serbia and Türkiye.
- **Minimal use of equality bodies and labour inspectorates** by Roma victims of discrimination.

As a result, **the deterrent effect of anti-discrimination law remains weak**, and discriminatory recruitment practices continue largely unchecked across both public and private sectors.

CONCLUSIONS:

Across the 20 countries analysed, **employment remains one of the most persistently exclusionary socio-economic domains for Roma**, despite the existence of legal protections and a growing number of policy initiatives. While many States report affirmative measures, vocational training schemes and entrepreneurship programmes, these remain **fragmented, insufficiently targeted, weakly enforced and poorly monitored**. Sustainable labour-market inclusion is further undermined by persistent discrimination, low educational attainment, over-reliance on public works, and the near-total absence of binding positive action in public employment. Roma women and youth remain particularly disadvantaged, and labour-market discrimination continues to be structurally underreported and under-sanctioned. Overall, current employment policies have **not yet produced the level of structural transformation required to close the Roma employment gap in a durable and measurable manner**.

[1] FRA Roma Survey, 2025: https://fra.europa.eu/sites/default/files/fra_uploads/fra-2025-roma-survey-2024_en.pdf

9. ACCESS TO HEALTHCARE AND NON-DISCRIMINATORY HEALTH SERVICES

The ECRI's General Policy Recommendation No. 13^[1] asks Member States **to combat antigypsyism in health care, and accordingly, take measures to secure equal access to all quality health care to Roma;** recruit health mediators, in particular from the Roma community, to provide liaison between health personnel and managers and Roma, etc.

The Recommendation CM/Rec(2024) of the Committee of Ministers to member States on equality of Roma and Traveller women and girls^[2] asks member states to take effective measures in a timely and non-discriminatory manner to ensure for all Roma and Traveller women and girls, including for those who lack the necessary financial resources or documentation, the best possible state of health and respond appropriately to and prevent all avoidable health risks they are exposed to, in particular in the areas of sexual and reproductive health and rights, including contraception, prenatal, natal and postnatal care, and mental health.



[1] Cited above

[2] Cited above

Figure 8: Access to Healthcare and Non-Discriminatory Health Services across the 20 countries

Country	Access & Insurance Coverage	Discrimination in Healthcare	Health Outcomes & Deprivation	Targeted Measures (Mediators etc.)	Implementation & Accountability
Moldova	Very High	Medium	Very High	Medium	Very High
Montenegro	Very High	High	Very High	Low	Very High
Serbia	High	Medium	High	Medium	High
Türkiye	High	Medium	High	Low	Very High
Ukraine	Very High	High	Very High	Low	Very High
Romania	Medium	Medium	High	High	Medium
Bulgaria	Medium	Medium	High	Medium	High
Hungary	Medium	High	High	Low	High
Czechia	Medium	High	Medium	Medium	Medium
Slovakia	Medium	High	High	Low	Very High
Ireland	Medium	High	Medium	Medium	Medium
France	Low	Medium	Medium	Low	Medium
Poland	Medium	Medium	Medium	Low	Medium
Germany	Low	Medium	Medium	Low	Medium
Croatia	Medium	Medium	Medium	Medium	Medium
Greece	Medium	Medium	Medium	Medium	Medium
Spain	Low	Medium	Medium	Medium	Medium
Albania	Medium	Medium	Medium	Medium	Medium
North Macedonia	High	Medium	High	Medium	High
Italy	Medium	Medium	Medium	Medium	High

Structural challenges

Across the 20 countries covered by this comparative analysis, Roma face **structurally unequal health outcomes**, driven by the following interconnected factors:

- **Persistent discrimination in healthcare settings**, reported in Hungary, Ireland, Montenegro, Ukraine and Czechia.
- **Low health insurance coverage**, particularly in Moldova, Montenegro, Serbia, Türkiye and Ukraine, is largely linked to a lack of documentation, residence registration and administrative barriers.
- **Severe socio-economic deprivation**, including poverty, substandard housing and segregation, directly affects health status and life expectancy.
- **Limited access to information, interpretation services and preventive care**, notably in Ireland, Türkiye, Hungary, Moldova and Ukraine.
- **Systemic barriers for Roma women**, including unequal access to maternal healthcare, reproductive health services and protection from obstetric abuse and segregation.
- **Absence of independent, State-led assessments of discrimination in healthcare**, with most evidence coming instead from NGOs, ombudspersons and international monitoring bodies.

These factors generate deep and cumulative health inequalities which remain largely unaddressed by mainstream healthcare systems.

Country clusters and examples

Countries with compensation schemes and targeted anti-discrimination measures:

Czechia stands out as the only country with a legally established compensation mechanism for victims of forced sterilisation, in force since 2022. [1] By 2024, nearly 2 000 claims had been submitted, with compensation granted in fewer than half of the processed cases. Despite the scheme, FRA data indicate a sharp rise in perceived discrimination in healthcare, increasing from 8% in 2016 to 22% in 2021. Targeted outreach and health promotion projects exist but remain insufficient in scale.

Countries with unresolved historical violations and continuing segregation:

The Slovak Republic continues to face unresolved cases of forced sterilisation of Roma women, with no functioning compensation mechanism. Recurrent reports of segregation of Roma women in maternity wards persist, despite official apologies. Repeated legislative attempts to establish a compensation scheme have failed, and no independent inquiry body is currently operational.

Countries relying almost exclusively on mainstream healthcare systems:

France, Hungary, Poland and Ireland rely primarily on universal healthcare approaches without systematic ethnic monitoring, targeted outreach or tailored Roma healthcare programmes, limiting the effectiveness of their responses to documented inequalities.

Countries with severe access barriers and critical health outcomes:

Montenegro and Moldova exhibit the largest access gaps. In Montenegro, Roma and Egyptians face limited access due to a lack of documents, language barriers, poverty and discrimination. Life expectancy among Roma dropped to 55.9 years in 2020, nearly 20 years below the national average[1]. In Moldova, access is undermined by a lack of insurance, high medicine costs, distance from facilities and discriminatory attitudes, with 30% of Roma lacking access to medical services during the Covid-19 period.

Countries with structured mediation and community health networks:

Romania maintains an extensive network of community centres and over 460 Roma health mediators, representing one of the most developed mediation systems. Serbia, Ireland, and, to a limited extent, Moldova report structured health strategies targeting Roma, though major implementation gaps remain.

[1] In 2021 the Czech Senate passed a law establishing a system for awarding compensation to victims of forced sterilization, which came into force in January 2022. The legislation states that any person who underwent sterilisation without “free decision and information about the consequences” between 1 July 1966 and 31 March 2012 is eligible to receive CZK 300 000 (equivalent to about €12 000) from the state.

[2] ECRI Monitoring Report on Montenegro, Sixth Monitoring cycle, 2025: <https://rm.coe.int/third-report-on-montenegro/488029120c>

Policy measures and implementation gaps

Across the 20 countries, **health mediation, vaccination campaigns, maternal outreach and community health services exist only in a limited number of States**, and remain characterised by:

- **Small-scale, donor-funded and project-based implementation**, rather than stable State-funded systems.
- **Shortages of Roma health mediators**, particularly in Montenegro, Moldova, Serbia and Ukraine.
- **Weak coordination between national health strategies and local service delivery**, especially in rural and segregated areas.
- **Limited enforcement of anti-discrimination safeguards in hospitals**, particularly in obstetric departments.
- **Absence of systematic ethnic data collection on health outcomes**, severely weakening policy targeting and accountability.
- **Minimal Roma participation in the design, delivery and monitoring of health policies.**

While Albania has expanded free medical check-ups and Bulgaria has introduced obstetric care for uninsured women, such measures remain **fragmented and insufficient to offset structural exclusion**.

Litigation and enforcement trends

Healthcare discrimination against Roma remains **systematically under-litigated** across all countries. Monitoring bodies consistently report:

- **Low awareness of patient rights and complaint mechanisms**, particularly among Roma women and elderly persons.
- **Fear of retaliation and deep mistrust of institutions**, especially in Hungary, Montenegro, Serbia and Türkiye.
- **Minimal accountability for discriminatory practices**, including segregation in maternity wards and denial of emergency care.

Czechia remains the sole country with a functioning compensation scheme for forced sterilisation, while the Slovak Republic^[1] continues to lack both **judicial accountability and an administrative redress mechanism**.

CONCLUSIONS:

Across the 20 countries analysed, **access to healthcare remains structurally unequal for Roma**, despite universal healthcare frameworks and repeated strategic commitments. Persistent insurance gaps, discriminatory treatment, lack of tailored outreach services and weak enforcement of patient rights continue to drive **stark health inequalities**, particularly affecting Roma women. While a small number of States have developed mediation systems, outreach programmes or compensation schemes, these remain **isolated exceptions rather than systemic solutions**. The widespread reliance on mainstream healthcare measures, without targeted safeguards against antigypsyism, continues to limit the effectiveness of national health systems in ensuring real and equal access for Roma.

Overall, **current healthcare policies have not yet achieved the level of structural transformation required to close the Roma health gap in a sustainable and rights-compliant manner.**

[1] In November 2021, [the women received an official apology from the Slovakian Government](#).

10. COMBATING HATE SPEECH AND HATE CRIME (REGULATORY AND LEGAL ACTIONS, POLICE AND COMMUNITY RELATIONS)

The ECRI's General Policy Recommendation No. 13^[1] asks member states **to combat racist violence and crimes against Roma**, and accordingly: pay particular attention to the implementation of ECRI's General Policy Recommendation No. 11 on combating racism and racial discrimination in policing, especially Chapter III thereof on the role of the police in combating racist offences and following up racist incidents; set up a comprehensive system for recording acts of violence against Roma; take steps to encourage Roma victims of racist violence and crimes to lodge complaints, give the police, prosecuting authorities and judges special training concerning the legislation punishing racist crimes and its implementation etc.

This section aims to synthesise and capture measures of relevance regarding the activity of the regulatory authorities for media services, measures ensuring that bias/hate motivation is duly investigated; promotion of police training on issues affecting Roma populations; promotion of Roma recruitment in the police services, and measures to tackle under-reporting in cases of discrimination. This section relied primarily on civil society reports, monitoring reports from ODIHR and the CoE, and, where relevant, on commitments made in the NRSF in these areas.



[1] Cited above

Figure 9: Combating Hate Speech and Hate Crime overview across the 20 countries

Country	Legal Recognition & Framework	Hate Crime Recording & Data	Police Training & Bias Investigation	Political Discourse	Implementation & Victim Protection
Germany	Very High	Very High	High	High	High
Italy	Medium	Medium	High	Medium	Medium
Bulgaria	Medium	Medium	High	Very high	Medium
Czechia	Medium	Medium	High	Medium	Medium
Romania	Medium	Medium	High	Medium	Medium
Spain	Medium	Medium	High	Medium	Medium
North Macedonia	Medium	Medium	High	Medium	Medium
Slovakia	Medium	Medium	High	Medium	Medium
Croatia	Medium	Low	Medium	Medium	Low
Ireland	Medium	Medium	Medium	Medium	Medium
France	Medium	Medium	Medium	Medium	Medium
Poland	Low	Low	Low	Low	Low
Hungary	Low	Low	Low	Low	Low
Serbia	Low	Low	Low	Low	Low
Montenegro	Low	Low	Low	Low	Low
Moldova	Low	Low	Low	Low	Low
Türkiye	Low	Low	Low	Low	Low
Ukraine	Low	Low	Low	Low	Low
Greece	Medium	Low	Medium	Medium	Low
Albania	Medium	Low	Medium	Medium	Low

Structural challenges

Across the 20 countries covered by this comparative analysis, the following **systemic challenges** persist:

- **Widespread underreporting of hate crime**, with FRA data showing a continued decline in the rate of Roma reporting incidents across almost all countries.
- **Weak public condemnation of anti-Roma hate speech by political leaders**, particularly in Türkiye, Serbia, Moldova, Montenegro, Poland, Hungary and Ukraine.
- **Limited recognition of antigypsyism as a distinct form of racism in national legal systems**, rendering anti-Roma bias largely invisible in criminal justice responses.
- **Heavy reliance on civil society for monitoring and documentation**, with minimal State-led data collection.
- **Severe gaps in online hate speech regulation**, with digital antigypsyism largely unchecked across all countries.
- **Low trust in law enforcement and judicial authorities** discourages Roma victims from lodging complaints.

These factors produce a self-reinforcing cycle of **impunity, invisibility and institutional disengagement**.

Country clusters and examples

Countries with advanced legal and data frameworks:

Germany stands out for its systematic hate crime recording^[1], recognition of antigypsyism as a category of politically motivated crime, and strengthened criminal sanctions. The Network Enforcement Act has significantly reduced overt hate speech on major platforms. Police and judiciary now collect nationwide hate crime data, and structured cooperation with civil society exists.

Countries with structured police training but weak bias recognition:

Italy, Bulgaria, Czechia, Romania, Spain, North Macedonia and the Slovak Republic provide police training on hate crime and Roma-related issues, yet bias motivation remains inconsistently investigated, and judicial hate crime data remain incomplete. Italy has advanced police training through OSCAD but lacks full prosecutorial reporting and antigypsyism-specific legal recognition.

Countries with strategic commitments but weak enforcement:

Croatia has embedded hate speech and hate crime measures within national action plans and plans a systematic study on Roma representation in the media by 2025. However, political rhetoric and local-level hate speech persist, and Roma-specific monitoring remains absent in practice.^[1]

Countries with minimal institutional engagement:

Türkiye, Poland, Hungary, Serbia, Montenegro, Moldova, and Ukraine show weak political condemnation, limited recognition of bias, and almost complete dependence on NGOs for monitoring. In several of these States, antigypsyist narratives continue to appear in political discourse with minimal consequences.

Countries relying on broad anti-racism frameworks:

Ireland integrates Roma within general anti-racism and hate crime strategies but lacks Roma-specific enforcement mechanisms, and recent legislative developments have weakened explicit hate speech protections.

[1] In 2018, the Network Enforcement Act came into force, obliging major social network providers to remove hate speech in clear cases within 24 hours. It is reported that the most serious and open forms of hate speech disappeared from the large social media platforms

[1] ECRI, Sixth report on Croatia, <https://rm.coe.int/sixth-report-on-croatia/1680b65f43>

Policy measures and implementation gaps

Across the 20 countries, most States report **formal legal frameworks against hate speech and hate crime, but implementation** remains characterised by:

- **Inconsistent recognition of antigypsyism** (absent in Türkiye, Poland, Hungary, Montenegro, Serbia and Ukraine).
- **Fragmented police training**, often limited to isolated modules without mandatory national coverage.
- **Weak prosecutorial follow-up**, with very limited hate crime data from courts in many countries.
- **Ineffective media regulation**, where regulators act mainly reactively and rarely sanction anti-Roma content.
- **Absence of Roma recruitment in policing structures**, weakening community trust and early detection of hate crime.
- Lack of institutionalised victim-support systems tailored to Roma victims.

While Germany stands out as a strong exception in regulatory capacity, most other countries exhibit **major enforcement deficits**.

Litigation and enforcement trends

Across all 20 countries, **hate crimes against Roma remain severely under-litigated**. Monitoring bodies consistently highlight low registration of bias motivation by police, high attrition between police reporting and judicial outcomes, minimal use of aggravating circumstances in sentencing and limited victim confidence in fair treatment by authorities. Even in States with strong legal frameworks, **the gap between reported incidents, recorded bias, prosecutions and convictions remains substantial**.

CONCLUSIONS:

Across the 20 countries analysed, **combating anti-Roma hate speech and hate crime remains one of the weakest areas of institutional response**. While general legal frameworks exist in all States, **antigypsyism remains structurally under-recognised, under-recorded and weakly sanctioned**.

Media regulators are formally established everywhere but lack the independence, mandate or political backing to effectively curb anti-Roma rhetoric, particularly in online environments. Public political condemnation remains inconsistent and largely reactive. Civil society organisations continue to shoulder the primary burden of monitoring, victim support and advocacy.

Overall, **current regulatory, policing and judicial responses remain insufficient to ensure effective deterrence, accountability and protection for Roma victims of hate crime**, and fall short of the structural transformation required to counter entrenched antigypsyism across the region.

11. HISTORY OF ROMA AND TRAVELLERS

In July 2020, CoE adopted the Recommendation CM/Rec(2020)2 - "Inclusion of the history of Roma and/or Travellers[1] in school curricula and teaching materials". It emphasises the importance of **acknowledging the longstanding presence of Roma and Travellers in Europe and recognising their contributions to European cultural heritage**, and highlights the significance of **teaching about the genocide** perpetrated against Roma and Travellers during World War II and its role in combating hatred, discrimination, and prejudice.^[1] Moreover, the Council of Europe has made efforts to include the Roma Holocaust in school curricula and textbooks in its member states, with a key objective set forth in our Strategic Action Plan for Roma and Traveller Inclusion (2020-2025)^[2]. This initiative has promoted the teaching of Roma history in general.

To reinforce this effort, CoE launched a two-year joint EU-Council of Europe programme: "Roma Holocaust Remembrance and Education" (Roma Memory)^[3] to increase public knowledge across Europe. In addition, the Council of Europe Steering Committee on Anti-Discrimination, Diversity and Inclusion is now providing member states, teachers and educators with several tools to teach Roma and Traveller history. A constant reiteration of the importance of the Roma Holocaust, can also be found in the Commissioner for Human Rights' discourse, calling on all states to ensure that Roma history is kept alive and reminded them about the different tools at their disposal to make sure that the memory of those lost remains and is converted into concrete measures of protection for the human rights of Roma.^[4] On the same note, the Advisory Committee on the Framework Convention urges the authorities to extend intercultural education and introduce Romani history and culture into school curricula, textbooks and teaching materials with a view to increasing knowledge among the general population and reducing the prevalence of negative stereotypes; and to provide teacher training accordingly.

Structural challenges

Across the ten countries examined, several structural challenges persist:

- **Lack of mandatory teaching:** While information on the Roma Holocaust and history may be included in school curricula, it is often not compulsory and is not monitored by school inspectorates.
- **Civil society-led commemoration:** Most Roma Holocaust remembrance practices are coordinated by NGOs rather than state authorities, limiting official recognition.
- **Fragmented educational content:** Where Roma history is included, it is often part of broader intercultural or Holocaust education, without dedicated modules or consistent materials.
- **Limited teacher training:** Educators frequently lack structured support or training to teach Roma and Traveller history effectively.
- **Varied official recognition:** Recognition of the Roma genocide varies widely, from formal acknowledgement to unofficial local commemorations.

[1] Recommendation CM/Rec(2020)2 of the Committee of Ministers to member States on the inclusion of the history of Roma and/or Travellers in school curricula and teaching materials

[2] Cited above

[3] Available at: <https://rm.coe.int/factsheet-european-union-council-of-europe-joint-programme-roma-holoca/1680b04f88>

[4] Available at: <https://rm.coe.int/annual-activity-report-2023-by-dunja-mijatovic-commissioner-for-human-/1680ae3a07>

Country clusters and examples

NORTH MACEDONIA: Three Holocaust memorial days exist, including the Roma Genocide Day (2 August) commemorated since 2017[1]. These events are attended by officials and include exhibitions and theatre plays. However, the Roma Holocaust is not officially recognised, and teaching on Roma history is available through intercultural curricula for primary education, but is neither mandatory nor monitored.

ITALY: No official recognition of the Roma Holocaust exists. Law 20 July 2000, no. 211, instituting Holocaust Remembrance Day, does not mention Roma or Sinti. Local commemorations such as International Roma Day (8 April) are organised by cities. While some curricular content exists and OSCE/CoE seminars have supported policy development, Roma history is neither mandatory nor officially integrated into school curricula[2].

GERMANY and SLOVAKIA: Official recognition of the Roma Holocaust exists, but without legislative provisions mandating curricular integration.

CZECHIA, SPAIN, ROMANIA: Unofficial commemorations exist, sometimes supported by government officials, with partial references in NRSFs to raising awareness about the Roma Holocaust.

ALBANIA, BULGARIA, GREECE: No official recognition or NRSF commitments exist; commemorations are largely civil society-driven.

Structural challenges

1. Official recognition of the Roma Holocaust/Genocide:

- Strong official recognition: Germany, Slovakia
- Partial or unofficial recognition: Czechia, Italy, Spain, North Macedonia, Romania
- Limited or absent recognition: Albania, Bulgaria, Greece

2. Commemorative practices:

- National or state-supported events: Germany, Slovakia, Czechia, Spain, Romania
- Civil society-led or local initiatives: Italy, North Macedonia, Bulgaria, Greece

3. Inclusion in school curricula:

- Information available but not mandatory or monitored: Bulgaria, Czechia, Germany, Greece, Spain, Italy, Romania, North Macedonia, Slovakia
- Inclusion uncertain or embedded in general Holocaust instruction: Albania

4. Gaps between recognition and education:

- Even countries with official recognition often **lack structured teaching**, leaving Roma history largely invisible in formal education.
- NGO-driven initiatives frequently supplement state efforts, creating inconsistent coverage and limited societal awareness.

[1] RIPE, National Roma Focal Point, Questionnaire 2024

[2] Teaching about and Commemorating the Roma and Sinti Genocide: Practices within the OSCE Area, 2015

CONCLUSIONS:

Across the countries, **recognition of the Roma Holocaust outpaces systematic educational inclusion.** Where commemorations exist, they are often symbolic and **not embedded in formal curricula.** Roma and Traveller history is typically available in school materials, but is **optional, fragmentary, and largely unmonitored,** limiting its potential to counter stereotypes and antigypsyism. Teacher training and structured pedagogical support remain underdeveloped, further constraining the effectiveness of inclusion efforts.

Overall, while awareness-raising and civil society initiatives have made progress, **systemic integration of Roma history and the Holocaust into education is insufficient.** Greater legislative and policy commitment is needed to ensure consistent teaching and meaningful societal impact.



12. ROMA WOMEN AND GIRLS:

The Recommendation CM/Rec(2024) of the Committee of Ministers to member States on equality of Roma and Traveller women and girls^[1] notes that Roma and Traveller women are not only affected by antigypsyism, but are also often subject to multiple and intersecting forms of discrimination, in particular on the ground of gender, and that they may face sexism and violence combined with stereotypes, prejudice and discriminatory behaviour or norms which are related to their ethnic origin, nomadic way of life, migration or refugee status, religion, sexual orientation, gender identity and expression, sex characteristics, age, disabilities or other personal characteristics. The scope of the recommendation is to assist member States and other relevant stakeholders in promoting and achieving equality for Roma and Traveller women and girls and in protecting them against discrimination, hate and violence, with a specific focus on areas in which they are most exposed to intersectional discrimination.

In 2011, an EU Directive on Combating Trafficking (Directive 2011/36) was adopted. In particular, the Directive introduced the notion into international anti-trafficking law, a definition of the notion of a “position of vulnerability”, the abuse of which can be a constitutive element of human trafficking. Little has been done, however, to understand how discrimination against Roma may leave them in such a position^[2]. Moreover, in its Thirteenth Activity Report^[3], **GRETA** has observed that in some countries, forced begging and forced marriage are seen as social problems affecting the Roma community, and the prosecution rarely treats them as human trafficking. While being engaged and responsive in combatting trafficking, it is important to understand that it can affect anybody regardless of ethnicity, social status or country of origin.

However, there are a number of push factors that make individuals more vulnerable to trafficking. One of these factors has been specifically highlighted in the statement of the President of the European Committee of Social Rights on the occasion of the International day for the eradication of Poverty, on 17 October 2023, pointing to the fact that women were more likely to be at risk of poverty or social exclusion than men: 22.7 % of women as compared to 20.4 % of men. This is even more alarming when considering that, on average, 80 % of Roma were at risk of poverty in 2021. Another factor is represented by the unequal access to education across the member states. It is widely known that education is crucial to overcoming poverty and creating equal opportunities and life chances.

However, as highlighted in the Council of Europe Commissioner for Human Rights’ report on segregation^[4], deeply rooted prejudice and rejection towards ethnic minorities (especially the Roma community) result in exclusionary practices, ranging from segregation to illegal enrolment denials. An example of this is the separation of Roma children – **especially girls** – from other students based on the argument of parental preference and preconceived cultural or social specificities. As stressed by the European Court of Human Rights, parental consent can in no case serve as a waiver for discriminatory practices.

Across Europe, monitoring bodies including ECRI, GRETA and GREVIO, consistently underline that structural inequalities, including segregated education, informal employment, and persistent poverty, amplify the risks faced by Roma women. For example, forced marriage, early school leaving, and informal labour are documented drivers of long-term socio-economic disadvantage and heightened vulnerability to trafficking.

[1] Cited above

[2] Available at: https://www.myria.be/files/External_contribution_-_Breaking_the_silence_-_Trafficking_in_Romani_communities.pdf

[3] Available at: <https://rm.coe.int/13th-general-report-on-greta-activities-covering-the-period-from-1-jan/1680af7268>

[4] Available at: https://migrant-integration.ec.europa.eu/sites/default/files/2017-09/FightingSchoolSegregation_CouncilOfEurope.pdf

While the EU Directive 2011/36 on combating trafficking recognises the notion of “positions of vulnerability,” few national frameworks sufficiently address how discrimination and structural exclusion intersect to place Roma women at risk. In practice, cases of forced begging, forced labour, and early marriage are often treated as social issues rather than forms of trafficking, undermining both prevention and prosecution efforts. National-level initiatives and interventions show some promising approaches, though they remain unevenly applied. In Albania, the Ministry of the Interior has worked with civil society organisations such as ARSIS to raise awareness about trafficking risks in Roma and Egyptian communities, including campaigns on how to identify and report potential victims[1].

Similarly, in Bulgaria, local anti-trafficking commissions and the National Network of Health Mediators target Roma communities with information campaigns on the risks of irregular migration and labour exploitation. In the Slovak Republic, initiatives have focused on marginalised Roma settlements, supporting community centres, pre-school education, and awareness-raising around forced labour. Despite these efforts, monitoring shows that Roma women remain disproportionately represented among trafficking victims, and data disaggregated by ethnicity are largely unavailable, limiting the capacity to design evidence-based responses.

GRETA evaluations across the region consistently highlight these vulnerabilities. In Ireland, Roma and Traveller children face barriers to protection due to discrimination, documentation issues, and language obstacles[2]. In Serbia and Montenegro, Roma health mediators are identified as crucial actors for the prevention and detection of trafficking, but structural discrimination and limited trust in authorities constrain their effectiveness. In Croatia, GRETA stresses the need for awareness-raising and increased educational access to reduce vulnerability among Roma women and girls[3], while in Hungary and Ukraine, children in poverty or institutional care—including many Roma—remain at high risk of trafficking. In Moldova, Roma children in institutional care or with parents working abroad are particularly vulnerable, and GRETA recommends sustained social and economic measures to reduce risks. In Poland, attention is drawn to unaccompanied Roma and migrant children as a priority group for trafficking prevention.[4]

Gender-based violence remains another critical concern. GREVIO reports indicate that Roma women and girls face high levels of domestic and sexual violence, compounded by social marginalisation, discrimination, and lack of culturally sensitive support services. In Croatia, educational activities under the National Roma Inclusion Plan are welcomed as a preventive measure against gender-based violence. France is urged to adopt an intersectional approach, incorporating Roma women explicitly in violence-prevention policies[5], while Ireland’s strategy recognises multiple forms of discrimination but notes persistent barriers in accessing support. Montenegro, Poland, and Serbia report cases where harmful traditional practices, such as forced marriage, occur but remain largely unprosecuted. Additionally, access to healthcare, reproductive services, and shelters is often limited for Roma women, particularly when identification documents are absent or when discriminatory treatment occurs.

[1] Available at: <https://rm.coe.int/mpendium-of-good-practices-in-addressing-trafficking-in-human-beings-f/16809f9bef>

[2] GRETA Third Evaluation Report on Ireland: <https://rm.coe.int/greta-third-evaluation-report-on-ireland/1680a84332>

[3] GRETA, Fourth Evaluation Report on Croatia: <https://rm.coe.int/greta-evaluation-report-on-the-implementation-of-the-council-of-europe/1680b66807>

[4] GRETA, Third Evaluation Report on Poland: <https://rm.coe.int/greta-evaluation-report-on-poland-3rd-evaluation-round-greta-2023-08-a/1680ab7039>

[5] GREVIO, First Thematic evaluation report on France: <https://rm.coe.int/first-thematic-evaluation-report-building-trust-by-delivering-support-/4880286c9c>

Socio-economic disparities further exacerbate risks for Roma women. FRA data[1], available for specific contexts, show that Roma and Traveller women have significantly lower employment rates than men, with a persistent gender gap—38% of women aged 20–64 in employment versus 69% of men in the same age group. Life expectancy disparities are similarly stark: Roma/Traveller women live on average 7.4 years less than women in the general population, while men face an 8-year gap. These structural disadvantages intersect with limited access to education, high rates of early school leaving, and exclusion from formal labour markets, reinforcing patterns of poverty, marginalisation, and vulnerability to exploitation.

Promising practices across the region include community mediation programs, targeted awareness campaigns, safe-migration initiatives, and child-protection efforts. Yet these programs are frequently **pilot-based, underfunded, or fragmented**, limiting their sustainability and overall impact.

Monitoring bodies consistently call for comprehensive strategies that combine ethnicity- and gender-sensitive data collection, targeted prevention measures, improved access to education and employment, strengthened victim support services, and enhanced cross-border cooperation. Without such structural improvements, anti-trafficking and gender-based violence prevention efforts for Roma women and girls are unlikely to achieve sustained impact.

[1] FRA Roma Survey, 2025

RECOMMENDATIONS FOR THE COUNCIL OF EUROPE MONITORING BODIES

- 1. Data Collection:** Establish standardised, legally compliant systems for disaggregated Roma data, ensuring voluntary self-identification, informed consent, and robust data protection. Monitoring bodies should track progress in building sustainable, rights-based frameworks.
- 2. National Strategies:** Integrate measurable objectives, baselines, timetables, and dedicated funding into Roma strategies, with mandatory consultation and independent evaluation to strengthen accountability.
- 3. Community Participation:** Deepen engagement of grassroots Roma organisations, women, and youth in strategy design, implementation, and evaluation, ensuring local needs are reflected in policy.
- 4. Combating Antigypsyism:** Strengthen state-led measures to counter antigypsyism in public discourse and media, promote ethical journalism, and expand Roma mediator schemes to build trust with institutions.
- 5. Inclusive Education:** Implement comprehensive desegregation measures, supported by funding, teacher training, anti-bullying programmes, and intercultural education, with enforceable plans and structural solutions.
- 6. Adequate Housing:** Adopt binding frameworks to prevent spatial segregation, ensure access to adequate housing, safeguard against forced evictions, and provide sustainable alternatives for displaced families.
- 7. Employment Access:** Promote affirmative action and targeted labour-market measures, create quality job opportunities, incentivise private sector participation, and combat structural discrimination.
- 8. Healthcare Access:** Guarantee equal access to quality healthcare, institutionalise Roma health mediators, eliminate discriminatory practices, and implement health-related commitments from national strategies.
- 9. Monitoring and Evaluation:** Strengthen monitoring systems with functional feedback loops, transparent reporting, and independent evaluations to ensure policies are outcome-oriented and accountable.
- 10. Roma CSOs in EU Funds:** Institutionalise participation of Roma civil society organisations in monitoring and evaluation of EU funding programmes to ensure community-driven oversight.
- 4. Hate Crime and Law Enforcement:** Improve hate crime recording and prosecution, provide mandatory bias-motivation training for police and judiciary, and promote Roma recruitment to strengthen trust.
- 5. Roma History and Holocaust Remembrance:** Integrate Roma history and the Holocaust into curricula and awareness campaigns to combat historical denial and promote respect for Roma cultural heritage.
- 6. Roma Women and Girls:** Implement gender-specific measures within national Roma and gender strategies, promoting access to education, employment, healthcare, and political participation. GRETA and GREVIO should monitor and encourage targeted responses to trafficking and gender-based violence.
- 7. Local Implementation Capacity:** Strengthen local and regional institutional capacity, including municipal Roma units and local action plans, supported by resources, expertise, and political incentives. Promote knowledge exchange and best practices to overcome structural obstacles.

RECOMMENDATIONS FOR THE COUNCIL OF EUROPE MONITORING BODIES

15. Alignment of Western Balkan Roma Inclusion Frameworks with EU Standards:

Encourage Western Balkan countries to fully mirror the EU requirements for Roma inclusion processes, ensuring that national strategies and action plans incorporate measurable objectives, baseline indicators, dedicated funding, structured monitoring, and robust accountability mechanisms. Member states should adopt participatory, rights-based approaches that involve Roma communities at all stages, including local and regional consultation, and align with EU best practices in data collection, desegregation in education, housing, employment, healthcare, and combating antigypsyism.

Monitoring bodies should actively support Western Balkan governments in harmonising their policies with EU frameworks, facilitating technical assistance, knowledge exchange, and capacity-building to strengthen administrative, financial, and institutional capabilities. This will promote consistency across the region and help reduce disparities in Roma inclusion outcomes between EU and non-EU countries.



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