FROM COMMITMENTS TO IMPLEMENTATION

NATIONAL ROMA STRATEGIC FRAMEWORKS 2021–2030

Civil Society Assessment of progress and implementation gaps in EU Member States and Enlargement Countries



ERGO NETWORK

This report was written by Isabela Mihalache, Senior Policy and Advocacy Coordinator with the European Roma Grassroots Organisations (ERGO) Network. It is based on an extensive data collection exercise among the Roma civil society organisations in European Union and Enlargement countries, carried out between September and October 2026.

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The umbrella term "Roma" encompasses diverse groups, including Roma, Sinti, Kale, Romanichels, Boyash/Rudari, Ashkali, Egyptians, Yenish, Dom, Lom, Rom and Abdal, as well as Traveller populations (gens du voyage, Gypsies, Camminanti, etc.), in accordance with terminology used by the European Commission.

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ABBREVIATIONS

CERV – Citizens, Equality, Rights and Values programme
EC – European Commission
EU – European Union
FRA – European Union Agency for Fundamental Rights
MFF – Multiannual Financial Framework
NRCP – National Roma Contact Point
NRFS – National Roma Strategic Framework
RCM – Roma Civil Monitor



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EXECUTIVE SUMMARY

Five years into the EU Roma Strategic Framework for Equality, Inclusion and Participation 2020–2030, the central challenge is no longer principally the absence of strategies, but their insufficient translation into rights, services and measurable improvements in Roma people's lives. ERGO Network's 2026 monitoring finds a persistent gap between policy commitments and implementation, alongside weak enforcement, uneven institutional responsibility, insufficient Roma influence and limited transparency about resources and results.

The report draws on 51 civil society responses from 35 countries: 35 responses from 26 EU Member States and 16 from nine enlargement countries, collected in September–October 2026. It combines these assessments with European and national policy reporting, FRA evidence, Roma Civil Monitor findings and independent research. The survey is not statistically representative: figures describe respondents, not countries or measured national outcomes. Nevertheless, recurring concerns across thematic areas point to priorities for institutional scrutiny and corrective action.

Implementation: commitments have not become consistent results

Among EU respondents, 34 of 35 assessed national Roma frameworks as less than largely implemented; 22 reported little or no progress since 2021 and one reported regression. Enlargement-country assessments also predominantly described implementation as partial, limited or absent. These findings are not country rankings. They indicate that the 2027 mid-term review must test whether the governance, financing and enforcement arrangements introduced under the current framework have addressed the implementation failures already identified under its predecessor.

Structural antigypsyism continues to undermine Roma equality and access to rights

In the EU sample, 28 of 35 respondents reported that discrimination against Roma had not decreased since 2021, and the same number identified little or no progress against anti-Roma hate speech and hate crime. Among enlargement respondents, 12 of 16 reported no reduction in discrimination and 15 of 16 reported little or no progress against hate speech and hate crime. In the EU sample, 29 of 35 assessed measures addressing discrimination or misconduct by public authorities as limited or absent. Formal recognition of antigypsyism is important, but must be matched by enforceable duties, desegregation, effective remedies and institutional accountability.

Poverty and exclusion remain mutually reinforcing across education, employment, healthcare, housing, social protection and essential services. In the EU sample, 26 of 35 respondents considered poverty-reduction measures limited or absent; 22 reported no significant change in Roma poverty since 2021 and nine perceived worsening. The report also documents barriers relating to digital access and environmental justice. Roma-specific initiatives cannot compensate for mainstream public systems that remain inaccessible, segregated or discriminatory; sectoral ministries and local authorities must be accountable for Roma equality outcomes.

Participation, identity and intersectional equality

Civil society participation is frequently assessed as consultation rather than influence over priorities, budgets and decisions. Effective participation requires early involvement, resources for independent Roma-led and grassroots organisations, protection of civic space, and public feedback on how contributions shape policy. Recognition of Romani language, culture, history and identity—including remembrance and responses to

historical injustice—is an integral part of equality, not a symbolic supplement.

The report highlights insufficient policy attention to the distinct and intersecting barriers faced by Roma women and girls; Roma children and young people; older Roma; Roma persons with disabilities; LGBTIQ+ Roma; mobile EU Roma; Roma migrants; returnees; and Roma who are stateless or at risk of statelessness. Visibility must lead to accessible, appropriately safeguarded measures developed with the groups concerned. Survey assessments of policy attention should not be mistaken for measurements of discrimination experienced by each group.

Roma children, justice and protection from family separation

The cumulative effects of poverty, discrimination, segregation and inadequate services are particularly serious for Roma children. The report calls for effective implementation of the European Child Guarantee in EU Member States, strengthened child poverty measures in enlargement countries, accessible family support and safeguards against unnecessary separation of children from their families. Poverty or inadequate housing alone must never be treated as sufficient grounds for removal. In parallel, barriers to reporting discrimination and obtaining remedies expose the distance between formal equality protections and their practical accessibility. Equality bodies, courts and public authorities need the independence, resources and procedures to secure effective protection.

Funding, monitoring and governance: the accountability deficit

Only three of 35 EU respondents and one of 16 enlargement respondents unequivocally considered national funding for Roma strategies clearly identifiable and traceable. Only two respondents in each sample confirmed measurable targets and indicators in use. These responses do not prove the absence of national budgets or monitoring systems, but show a serious gap in their visibility and credibility for civil society. Public reporting must distinguish planned allocations, expenditure, delivery and outcomes, and explain what action follows when progress stalls.

National Roma contact points cannot carry implementation alone. Governments must assign responsibilities, resources and measurable obligations to mainstream ministries, regional and local authorities and funding bodies. The European Commission, with DG JUST coordinating the EU Roma Framework across relevant services, should connect monitoring with social and economic governance, funding oversight and EU-law enforcement where applicable. Enlargement countries require coherent follow-up through fundamental-rights and accession processes, coordinated with DG ENEST and informed by independent Roma civil society.

Priorities for 2027–2030

The report recommends making the 2027 mid-term review a process of corrective action, with named responsibilities, deadlines and public follow-up; enforcing equality and desegregation obligations; strengthening accessible remedies; investing in family support and inclusive services; guaranteeing meaningful Roma civil society influence; and making intersectional equality and Roma identity visible in policy design. The 2028–2034 Multiannual Financial Framework must ensure that Roma equality is identifiable in relevant programmes, that funding reaches community-led organisations, and that expenditure and outcomes can be traced. The Commission and national governments should respond to repeated findings of discrimination, non-delivery or opaque spending with proportionate oversight, revised measures and enforcement where warranted.

The remaining years to 2030 must therefore be treated as a period of delivery and accountability. Progress should be judged not by the number of strategies, meetings or funded activities, but by demonstrable changes in Roma people's rights, living conditions, participation and access to justice.

INTRODUCTION AND METHODOLOGY

Policy context and rationale

The EU Roma Strategic Framework for Equality, Inclusion and Participation 2020–2030 represents a renewed commitment by the European Union to address antigypsyism, discrimination and the persistent structural inequalities experienced by Roma. Building on the first EU Framework for National Roma Integration Strategies up to 2020, the current framework places greater emphasis on equality, participation, combating antigypsyism and achieving measurable improvements in Roma people's lives. It also recognises the need to address structural and institutional barriers that continue to prevent Roma from exercising their rights on an equal basis.

The framework is accompanied by the Council Recommendation of 12 March 2021 on Roma equality, inclusion and participation, which calls on Member States to adopt and implement national Roma strategic frameworks, strengthen monitoring arrangements, ensure meaningful Roma participation and allocate adequate resources.

For enlargement countries, Roma equality and inclusion are also linked to fundamental rights, democratic governance and accession-related reforms. In the Western Balkans, the 2019 Poznań Declaration on Roma Integration within the EU Enlargement Process established additional voluntary political commitments to improve Roma equality and inclusion, including in education, employment, housing, health, civil registration and non-discrimination. These commitments provide an important political benchmark for assessing implementation alongside the EU Roma Framework and relevant enlargement processes. Progress in accession negotiations should not, however, be treated as evidence of progress on Roma equality without independent assessment of concrete measures and outcomes.[1]

Since 2021, EU Member States and enlargement countries have adopted or revised national strategies, action plans and institutional arrangements. However, the existence of policy frameworks does not necessarily demonstrate their effective implementation. The central question is whether these commitments have resulted in concrete, sustained and measurable improvements in Roma equality, inclusion and participation, including reductions in poverty and segregation, effective protection against discrimination and institutional practices that reproduce antigypsyism.

European Commission assessments of national Roma strategic frameworks, surveys by the European Union Agency for Fundamental Rights (FRA), and independent civil society monitoring have continued to identify substantial challenges in translating commitments into results. These include insufficient implementation capacity, inadequate or untraceable funding, weak institutional coordination, limited enforcement of equality obligations, persistent segregation and discrimination, and insufficient opportunities for Roma communities and organisations to influence decisions affecting them.

These challenges also raise broader questions about institutional responsibility and accountability. Roma equality cannot be achieved through Roma-specific strategies alone if mainstream policies on education, employment, healthcare, housing, social protection and public administration do not systematically address structural discrimination and unequal access. Similarly, consultation mechanisms, monitoring exercises and reported activities cannot substitute for effective participation, corrective measures and demonstrated improvements in outcomes.

1 Declaration of Western Balkans Partners on Roma Integration within the EU Enlargement Process (Poznań Declaration), 5 July 2019; European Commission (2026), Report on the implementation of the national Roma strategic frameworks, COM(2026) 602 final, Section III.

The year 2026 represents a particularly important point in the implementation cycle. Five years after the adoption of the Council Recommendation and more than halfway through the current EU Roma Framework, there is sufficient implementation experience to assess whether the stronger commitments introduced in 2020 have addressed weaknesses identified under the previous framework. The forthcoming 2027 mid-term review therefore provides an opportunity not only to measure progress, but also to examine why longstanding implementation failures persist and what institutional changes are necessary to achieve the framework's objectives by 2030.

This assessment is also relevant to negotiations on the next Multiannual Financial Framework for 2028–2034, the implementation of the EU Anti-Racism Strategy 2026–2030, and the integration of Roma equality into broader EU social, economic and fundamental rights policies. These processes will influence the resources, institutional responsibilities and accountability mechanisms available for delivering Roma equality during the remaining implementation period.

Objectives and scope of the report

ERGO Network has undertaken regular civil society monitoring of national Roma policies, drawing on the knowledge and experience of Roma and pro-Roma organisations, national advocates and other stakeholders engaged in their implementation. Its previous assessments, including the 2025 monitoring report examining developments since 2021, identified persistent gaps between national commitments and their practical delivery.

Building on this work, the 2026 report provides an independent, civil society-informed assessment of progress in implementing national Roma strategic frameworks across EU Member States and enlargement countries. It combines the findings of ERGO Network's 2026 monitoring survey with European and national policy assessments, institutional monitoring, independent research and documented national experiences.

The report has five interconnected objectives:

1. **Assess implementation and progress since 2021**, examining whether national commitments have translated into concrete measures, effective enforcement and improvements in Roma equality, inclusion and participation.
2. **Identify persistent structural and institutional barriers**, including antigypsyism, discrimination, segregation, poverty and unequal access to rights and essential services, and assess whether existing policies adequately address their underlying causes.
3. **Examine the effectiveness of governance and accountability arrangements**, including institutional responsibilities, coordination between Roma-specific and mainstream policies, Roma participation, funding, monitoring and access to effective remedies.
4. **Assess inequalities affecting different groups within Roma communities**, taking an intersectional approach to the experiences of Roma women and girls, children and young people, older Roma, Roma persons with disabilities, LGBTIQ+ Roma, mobile EU Roma, Roma migrants, returnees, and Roma who are stateless or at risk of statelessness, while recognising the diversity of their circumstances and the limitations of available evidence.
5. **Formulate strategic recommendations for the remaining implementation period**, identifying actions required from national governments, the European Commission and other relevant institutions to strengthen delivery, enforcement, monitoring and accountability ahead of the 2027 mid-term review and towards 2030.

The report examines EU Member States and enlargement countries separately where survey findings

and policy contexts require this distinction, while identifying shared challenges and relevant differences in implementation. Particular attention is given to the respective responsibilities of national authorities and the European Commission, including the latter's role in coordinating, monitoring and supporting implementation of the EU Roma Framework within its competences.

Throughout the analysis, the central concern is the relationship between policy commitments, institutional practices and measurable outcomes. The report therefore distinguishes the adoption of strategies, the implementation of activities and the achievement of meaningful changes in Roma people's lives.

Methodology and sources of evidence

The report is based on a combined analysis of civil society survey findings, European and national policy documents, institutional monitoring reports and independent research.

Between September and October 2026, ERGO Network conducted two civil society monitoring surveys on the implementation of national Roma strategic frameworks, using separate but broadly comparable questionnaires for EU Member States and enlargement countries. **Together, the surveys gathered 51 responses from 35 countries: 35 responses from 26 EU Member States and 16 responses from nine enlargement countries..**

The EU Member States covered were Austria, Belgium, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden.

The enlargement countries covered were Albania, Bosnia and Herzegovina, Kosovo*[2], Moldova, Montenegro, North Macedonia, Serbia, Türkiye and Ukraine.

The survey collected assessments from Roma and pro-Roma civil society stakeholders concerning the implementation of national Roma strategic frameworks, perceived progress since 2021, persistent barriers and priorities for further action. Separate but broadly comparable questionnaires, each comprising 55 questions (Q6–Q60), excluding respondent identification and background questions, were used for EU Member States and enlargement countries, reflecting differences in policy and institutional contexts.

The questionnaires covered the overall implementation of national Roma strategies; antigypsyism and discrimination; poverty and social exclusion; Roma participation; education; employment; healthcare; housing; digital inclusion and environmental justice; culture, history and identity; intersectionality; the situation of Roma children and young people; access to justice; monitoring; funding; and governance.

The survey findings are complemented by a review and comparative analysis of relevant policy and monitoring evidence, including:

- European Commission communications, implementation reports and assessments of national Roma strategic frameworks, including the 2024 and 2026 implementation reports and relevant EU policy developments;
- FRA surveys and research documenting Roma experiences of discrimination, poverty, segregation and unequal access to rights and services;
- Roma Civil Monitor national reports and comparative assessments of the implementation of national Roma strategic frameworks;

2 ** This designation is without prejudice to positions on status and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.*

- ERGO Network's previous civil society monitoring reports, RIPE Index assessments, thematic research and policy analyses, including research on Roma poverty, the European Semester, Roma children and prevention of family separation;
- Relevant Council of Europe monitoring findings, equality and human rights reports, legal decisions, and other national or European research and documentation.

The European Commission's third implementation report, published on 3 November 2026, covers developments between 1 June 2023 and 31 March 2025. Its findings are considered alongside the Commission's 2024 assessment, FRA's Roma Survey 2024 and ERGO Network's September–October 2026 civil society monitoring. The different reporting periods and evidence bases are distinguished, and reported national measures are not treated as evidence of effective implementation without corresponding outcomes.[3]

The analysis brings these sources together to examine the relationship between national policy commitments, reported implementation measures and their effectiveness in practice. Where relevant, national examples illustrate progress, promising approaches, persistent barriers or institutional shortcomings documented through independent monitoring and research.

Interpretation of survey findings and limitations

The report distinguishes between civil society assessments, official policy reporting and independently documented evidence. Survey responses reflect the knowledge, experience and assessments of participating stakeholders. They are not treated as direct measurements of national outcomes, while the existence of government programmes, funding allocations or reported activities is not assumed to demonstrate effective implementation.

The survey is not statistically representative, and the number of respondents varies between countries. Multiple responses from the same country may reflect different assessments. Consequently, survey percentages refer to respondents rather than countries and should not be interpreted as national rankings or as representative estimates of the views of all Roma civil society organisations.

Comparisons between EU Member States and enlargement countries are made cautiously, taking account of differences in policy contexts, institutional arrangements, sample sizes and questionnaire wording. Where findings are presented separately, they refer to the respective respondent groups rather than to all countries within either category.

The survey also has thematic limitations. Respondents' assessments of policy implementation do not necessarily establish changes in the prevalence of discrimination, poverty or segregation, nor do they independently demonstrate causal relationships between particular policies and outcomes. Similarly, findings concerning Roma children, intersectionality or access to justice should not be interpreted as direct measurements of individual experiences or the prevalence of specific rights violations unless supported by additional evidence.

Where possible, survey findings are considered alongside institutional data, independent monitoring and thematic research to identify recurring patterns, examine plausible explanations and assess whether official commitments correspond to documented experiences and outcomes. Differences between sources are interpreted in light of their respective methodologies and evidentiary limitations.

3 European Commission (2026), Report on the implementation of the national Roma strategic frameworks, COM(2026) 602 final, 3 November 2026, Brussels. Available at: https://commission.europa.eu/document/download/589cc7e7-8086-4163-82e4-4e820432f4fc_en?filename=2026%20Roma%20Implementation%20report.pdf

The combined approach allows the report to identify persistent implementation gaps, examine institutional and structural barriers, and assess the adequacy of policy responses. Its purpose is not to rank countries, but to provide an evidence-informed assessment of where implementation remains insufficient, which responsibilities require greater scrutiny and what corrective measures are needed.

Structure of the report

The report is organised around the main thematic commitments of the EU Roma Strategic Framework, broadly following the sequence of ERGO Network's 2026 civil society monitoring questionnaires.

It begins with an overall assessment of the implementation of national Roma strategic frameworks, followed by thematic chapters examining antigypsyism, poverty and social exclusion, Roma participation and influence in decision-making, education, employment, healthcare, housing, digital inclusion and environmental justice, and Roma culture, history, identity and recognition.

A dedicated chapter examines intersectionality and targeted measures, considering the diverse experiences of Roma women and girls, children and young people, older Roma, Roma persons with disabilities, LGBTIQ+ Roma, mobile EU Roma, Roma migrants, returnees, and Roma who are stateless or at risk of statelessness.

Further chapters address Roma children, child poverty and the prevention of unnecessary family separation; equality bodies, access to justice and effective remedies; monitoring, indicators and funding; and governance and accountability.

Each thematic chapter examines the relevant European policy commitments, presents civil society monitoring findings for EU Member States and enlargement countries, develops a comparative assessment and formulates recommendations.

The report concludes with an overall comparative assessment and strategic recommendations addressing the structural and institutional challenges identified across the thematic chapters. These conclusions aim to inform the 2027 mid-term review of the EU Roma Strategic Framework, discussions on the next Multiannual Financial Framework, and the measures required to strengthen implementation, enforcement and accountability towards 2030.



1. OVERALL IMPLEMENTATION OF NATIONAL ROMA STRATEGIC FRAMEWORKS

1.1. European policy commitments and implementation context

The EU Roma Strategic Framework for Equality, Inclusion and Participation 2020–2030 and the Council Recommendation of 12 March 2021 established a renewed policy basis for advancing Roma equality, inclusion and participation. They call for national frameworks that address antigypsyism and discrimination, promote equal access to education, employment, healthcare and housing, and strengthen Roma participation in public life.

The framework also places greater emphasis on measurable targets, monitoring, adequate funding and institutional responsibility. Its effectiveness therefore depends not only on the adoption of national strategies and action plans, but also on their implementation, enforcement and capacity to deliver tangible improvements.

Since 2021, governments have adopted or revised national Roma strategic frameworks and established implementation arrangements. Nevertheless, European Commission assessments and independent civil society monitoring have highlighted continuing weaknesses in the translation of commitments into effective measures, particularly in addressing structural discrimination, segregation and inequalities in access to rights and services.

The distinction between policy adoption and implementation is central to this assessment. A national strategy may contain ambitious objectives without adequate resources, enforceable measures or effective monitoring. Similarly, the existence of programmes and institutional structures does not necessarily demonstrate that Roma communities benefit from them or can influence their design and implementation.

The Commission's November 2026 assessment[4] reports improvements in 10 of 16 monitored indicators since 2016, while finding that progress remains insufficient to achieve most 2030 objectives and targets; employment is the exception currently considered on track. It also identifies weaknesses in national-to-local coordination, incomplete targets and a continued reliance on output rather than outcome indicators. These official findings reinforce the need to distinguish policy architecture from demonstrable implementation.

1.2. ERGO Network's 2026 civil society monitoring findings

ERGO Network's 2026 civil society survey examined whether national Roma strategic frameworks have been adopted, the extent to which they are implemented in practice, and respondents' assessments of progress since 2021.

EU Member States

Among the 35 respondents from 26 EU Member States, 23 confirmed that their government had adopted a national Roma strategic framework or equivalent policy measures. Five answered negatively, six provided

4 European Commission, COM(2026) 602 final, section I.

qualified responses and one did not know. These findings reflect respondents' assessments of the national policy framework and should not be interpreted as an independent verification of the legal or administrative status of each country's strategy.

Assessments of implementation were considerably less positive. Only one respondent (3%) considered the national framework fully implemented, while none selected largely implemented. Seventeen respondents (49%) reported partial implementation, 12 (34%) limited implementation and five (14%) no implementation.

Taken together, 34 of 35 respondents assessed implementation as less than largely effective, with 17 reporting limited or no implementation.

Perceptions of progress since 2021 reinforce this concern. Twenty-two respondents (63%) reported little or no progress, while one (3%) reported regression. Twelve respondents (34%) identified some progress, and none reported significant progress.

These findings suggest that, in the experience of the surveyed civil society stakeholders, national policy commitments have not yet translated into the scale of implementation and improvement envisaged by the EU Roma Strategic Framework.

Enlargement countries

The final enlargement-country sample comprises 16 responses covering nine countries: Albania, Bosnia and Herzegovina, Kosovo*, Moldova, Montenegro, North Macedonia, Serbia, Türkiye and Ukraine.

The survey responses indicate eight respondents assessing implementation as partial, six as limited and two as absent. It also records eight respondents identifying some progress since 2021 and eight reporting little or no progress.

1.3. Comparative interpretation and implementation challenges

The overall findings point to a recurring distinction between the formal existence of national Roma strategic frameworks and their effective implementation.

While national strategies provide an important policy basis, their practical impact depends on several interrelated conditions: sustained political commitment, adequate and traceable resources, clear institutional responsibilities, coordination across government levels, meaningful Roma participation, and independent monitoring of implementation and outcomes.

The predominance of partial or limited implementation assessments suggests that progress remains uneven and that measures may not be sufficiently comprehensive, coordinated or sustained. The limited number of respondents reporting positive developments since 2021 also raises questions about the pace of implementation relative to the framework's 2030 objectives.

These findings are broadly consistent with concerns raised in European Commission assessments and independent monitoring regarding the need to strengthen implementation, monitoring and accountability. However, the survey does not establish which specific factors explain the results in each country. These are examined in the thematic chapters through additional policy evidence, monitoring reports and national examples.

An important distinction must also be maintained between implementation activities and outcomes. The adoption of action plans, allocation of funding or delivery of individual projects may represent progress, but their effectiveness ultimately depends on whether they reduce discrimination and segregation, improve access to rights and services, and strengthen Roma participation and influence.

1.4. Key findings and implications

The 2026 civil society assessments indicate that national Roma strategic frameworks remain characterised by a substantial gap between commitments and implementation.

The findings underline the need to shift attention from policy adoption and activity reporting towards measurable delivery, effective enforcement and accountability for results.

This requires stronger monitoring of national commitments, greater transparency concerning implementation responsibilities and funding, and systematic involvement of Roma civil society in assessing whether measures produce meaningful changes.

The following chapters examine these challenges in greater detail, beginning with antigypsyism as a structural barrier to Roma equality, inclusion and participation.



2. ANTIGYPSYISM

2.1. European policy commitments and progress since 2021

The EU Roma Strategic Framework for Equality, Inclusion and Participation 2020–2030 marked an important shift in European Roma policy by recognising antigypsyism as a specific form of racism and a fundamental obstacle to Roma equality. The framework establishes combating antigypsyism and discrimination as a horizontal objective, while the accompanying Commission guidelines call for measures addressing its historical, structural and institutional dimensions, including segregation, discriminatory treatment by public authorities, hate speech and hate crime. The 2021 Council Recommendation reinforces these commitments, alongside existing obligations under EU anti-discrimination legislation. The framework also sets a target to reduce by at least half the proportion of Roma experiencing discrimination by 2030.[5]

The European Commission's 2024 implementation report indicates progress in policy recognition: 21 Member States reported specific measures to combat antigypsyism, 14 explicitly recognised it in legislation or policies, and 13 included antigypsyism or anti-Roma discrimination as a separate category in reporting or surveys. Some countries have introduced dedicated institutional arrangements or preventive measures, including the appointment of a Federal Government Commissioner against Antigypsyism (DE), recognition of anti-Roma racism through a parliamentary resolution (SK), and professional training and monitoring initiatives (FR). However, the scope, implementation and effectiveness of national measures remain uneven.[6]

Available outcome evidence is considerably less encouraging. FRA's Roma Survey 2024, published in 2025, found that 31% of surveyed Roma and Travellers experienced ethnic discrimination, compared with 26% in comparable 2016 results. Only 6% of those experiencing discrimination reported an incident or lodged a complaint, down from 16% in 2016. None of the surveyed EU countries was on track to meet the framework's discrimination reduction target.[7]

Independent monitoring by the Roma Civil Monitor and ERGO Network's RIPE Index further highlights weaknesses in implementation, institutional accountability and the enforcement of existing protections. Segregation in education and housing, discriminatory treatment by public institutions and inadequate access to justice remain major concerns. The Commission's infringement proceedings concerning Roma school segregation (CZ, HU, SK) illustrate the continuing importance of enforcing binding equality obligations.[8]

Taken together, these findings indicate that greater recognition of antigypsyism has not yet produced the institutional changes and measurable improvements required by the EU Roma Framework.

5 European Commission (2020), A Union of Equality: EU Roma Strategic Framework for Equality, Inclusion and Participation, COM(2020) 620 final; European Commission, Guidelines for planning and implementing national Roma strategic frameworks, Annex I; Council Recommendation of 12 March 2021 on Roma equality, inclusion and participation (2021/C 93/01).

6 European Commission (2024), Report on the implementation of the national Roma strategic frameworks, COM(2024) 422 final, Section 1.2.

7 European Union Agency for Fundamental Rights (2025), Roma Survey 2024.

8 European Commission (2024), COM(2024) 422 final; Roma Civil Monitor (2026), Civil society's assessment of the implementation of the National Roma Strategic Frameworks in the EU: Synthesis report; ERGO Network (2026), RIPE Index report.

The Commission's 2026 report adds further examples of institutional action: Germany established the independent Antigypsyism Reporting and Information Centre (MIA), Czechia and Slovakia formally adopted a definition of antigypsyism, and Spain began preparing a State Pact against Antigypsyism. Bulgaria reported mobile legal outreach for victims of discrimination. These are promising measures, not independently verified evidence that institutional discrimination has declined. The Commission itself acknowledges uneven enforcement, underreporting, discriminatory policing concerns and insufficiently resourced equality bodies.[9]

2.2. ERGO Network's 2026 civil society findings

ERGO Network's 2026 civil society survey examined recognition of antigypsyism, implementation of measures against discrimination, hate speech and hate crime, institutional accountability, access to remedies, monitoring, prevention and professional training.

EU Member States

Recognition and implementation. Fourteen respondents from 12 countries (AT, CZ, FR, DE, IT, LV, PT, RO, SK, SI, ES, SE) confirmed recognition of antigypsyism as a specific form of racism, while nine respondents from eight countries (BG, CY, DK, HU, LV, LT, LU, PL) reported that it was not recognised. Eighteen respondents from 16 countries confirmed the existence of specific measures in national Roma strategies or related action plans. Nevertheless, 26 respondents (74%) assessed implementation as absent or limited. Only two respondents (HR, DE) considered measures largely implemented.[10]

Discrimination, hate speech and hate crime. Twenty-eight respondents (80%) from 23 countries reported that Roma people's experiences of discrimination had not decreased since 2021. Only three respondents (LV, PL, ES) reported improvement. Similarly, 28 respondents (80%) identified little or no progress against anti-Roma hate speech and hate crime, while four (HR, LV, PT, SE) reported regression. Three respondents (IE, LT, ES) identified significant progress.[11]

Institutional accountability and access to justice. Twenty-nine respondents (83%) considered measures addressing discrimination or misconduct by public authorities absent or limited. No respondent assessed institutional responses as fully effective. Only one respondent (LT) considered reporting and redress mechanisms fully accessible and effective; 12 reported that effective access was lacking, while 22 assessed it as partial. Government monitoring was similarly inconsistent: only one respondent (SK) unequivocally confirmed comprehensive data collection and publication on discrimination against Roma and antigypsyism.[12]

Prevention and professional training. Seven respondents (HR, DE, IT, LV, LT, ES, SE) confirmed public awareness, education or media initiatives, while 14 reported their absence and 14 provided qualified answers. Professional training was also uneven, with the absence of relevant training reported particularly frequently for healthcare professionals (21 respondents), public administration and judicial professionals (17 each), law enforcement personnel (16) and teachers (15).[13]

Overall, EU respondents identify a substantial gap between formal recognition and implementation, alongside persistent discrimination, weak institutional accountability and insufficient preventive measures.

9 European Commission, COM(2026) 602 final, section II.I.

10 ERGO Network (2026), Civil society monitoring survey on national Roma strategic frameworks, EU Member States, questions 10–12.

11 Ibid., questions 13 and 16.

12 Ibid., questions 15, 17 and 18.

13 Ibid., questions 14 and 19.

Enlargement countries

Recognition and implementation. Five respondents (XK*, MK, RS) confirmed recognition of antigypsyism as a specific form of racism, while five (AL, XK*, MD, TR) reported that it was not recognised. Twelve respondents (AL, XK*, ME, MK, RS, UA) confirmed the inclusion of specific measures in national Roma frameworks. However,11 of 16 respondents (69%) assessed implementation as absent or limited, and none considered measures largely implemented.

Discrimination, hate speech and hate crime. Twelve respondents (75%), representing all nine countries, reported that discrimination against Roma had not decreased since 2021. Three respondents (XK*) reported improvement. Fifteen respondents (94%) identified little or no progress against anti-Roma hate speech and hate crime, while one (XK*) reported significant progress.

Institutional accountability and access to justice. Nine respondents (AL, BA, MD, ME, RS, TR, UA) assessed measures addressing discrimination or misconduct by public authorities as absent or limited. Only two respondents (XK*) considered reporting and redress mechanisms fully effective; 12 assessed them as partially effective, and two (ME, TR) reported that effective access was lacking. Comprehensive government data collection was confirmed by only one respondent (XK*).

Prevention and professional training. Four respondents (XK*, MK, UA) confirmed public awareness or educational initiatives, while nine reported their absence. Training was frequently described as absent or occasional, particularly in healthcare, public administration, education, law enforcement andthe judiciary.

The enlargement findings reveal a similar implementation gap to that observed in EU Member States, alongside particularly negative assessments of progress against hate speech and hate crime. Differences between respondents, notably in XK*and RS, also underline the importance of triangulating civil society assessments with other evidence.

2.3. Key assessment and conclusions

The combined evidence from European institutions, independent monitoring and ERGO Network's 2026 survey raises a fundamental question: why, after more than two decades of government-led Roma inclusion initiatives and two successive EU frameworks since 2011, do structural and institutional barriers continue to persist without consistent evidence of systemic and sustained progress?

This question must be considered in light of the European Commission's own assessment of the previous framework. Its 2017 mid-term review and 2018 evaluation identified limited progress, fragmented implementation, insufficient attention to antigypsyism and weaknesses in monitoring and policy effectiveness. Those findings helped shape the 2020–2030 framework, with stronger objectives on equality, participation and combating antigypsyism. The 2027 mid-term review must therefore assess whether the changes introduced in response to the earlier evaluation have corrected the weaknesses already identified nearly a decade ago.[14]

First, recognition has not been accompanied by a corresponding transformation of institutional responsibilities and practices. While recognising antigypsyism is an important advance, 74% of EU respondents and 69% of enlargement-country respondents considered implementation of relevant measures absent or limited. These assessments do not establish the cause of shortcomings in individual countries, but raise questions about whether policy commitments have become operational obligations, with defined institutional mandates, adequate resources, enforcement and corrective action.

14 European Commission, Midterm review of the EU framework for national Roma integration strategies, COM(2017) 458 final, 30 August 2017; European Commission, Report on the evaluation of the EU Framework for National Roma Integration Strategies up to 2020, COM(2018) 785 final, 4 December 2018; European Commission, Evaluation of the EU Framework for National Roma Integration Strategies up to 2020, SWD(2018) 480 final, 4 December 2018.

Second, mechanisms of exclusion embedded in institutions and policy processes remain insufficiently addressed. Structural racism can be reproduced through ostensibly neutral rules, established administrative practices, unequal distribution of resources and institutional arrangements, without depending exclusively on openly discriminatory intent. Awareness-raising and individual anti-discrimination measures are necessary but insufficient when discriminatory institutional practices remain unchanged. Measures to improve socioeconomic conditions may consequently have limited effects if the underlying structures producing unequal access are left intact.

Third, formal participation does not necessarily mean influence. Roma organisations may be consulted while having limited power to shape priorities, budgets, implementation and evaluation. Participation becomes tokenistic where institutions can demonstrate that consultation occurred without being required to respond to its substance. The relevant test is not simply whether Roma representatives were present, but whether they could influence decisions and secure institutional follow-up. The participation chapter examines these mechanisms in greater detail.

Fourth, weak enforcement, inaccessible remedies and fragmented monitoring can reinforce the persistence of discrimination. FRA's findings on low and declining discrimination reporting, together with respondents' assessments of institutional accountability and redress, point to barriers between formal legal protections and their practical use. Underreporting alone does not prove that remedies are ineffective; nevertheless, where discrimination is not adequately reported, investigated or remedied, institutions have fewer opportunities and incentives to correct discriminatory practices. Weak equality data and activity-based reporting further obscure whether measures change institutional conduct or Roma people's experiences.

These weaknesses are interconnected. Limited institutional responsibility may undermine implementation; discriminatory practices can persist without enforcement; consultation without influence may leave priorities unchanged; and insufficient monitoring makes recurring failures harder to identify and correct. This is a plausible explanatory pattern drawn from the combined evidence, not a single causal relationship established by the survey for every country.

Important advances in recognition, institutional mandates and Roma civil society advocacy should not be overlooked. However, their significance must be judged against implementation, enforceable rights, changes in institutional practices and measurable outcomes. The 2027 mid-term review should therefore examine why longstanding weaknesses persist, what governments have learned from earlier evaluations and which mechanisms can ensure that repeated findings lead to institutional correction rather than another cycle of commitments.

2.4. Recommendations

1. **Use the mid-term review of the EU Roma Strategic Framework 2020–2030 to assess whether persistent implementation failures are being effectively addressed.**

In line with its commitments under the current EU Roma Strategic Framework, the European Commission should ensure that its mid-term review assesses not only progress towards the framework's objectives and targets, but also the effectiveness of the mechanisms established to support implementation, monitoring and accountability. This should include examining whether the stronger commitments introduced in 2020 on combating antigypsyism, institutional coordination, Roma participation, funding and monitoring have translated into measurable improvements.

The review should also draw on the findings of the Commission's 2017 mid-term review and 2018 evaluation of the previous EU Roma Framework to examine whether longstanding weaknesses have been addressed or continue to undermine implementation. Where similar shortcomings persist, the Commission should identify the underlying obstacles, assess the effectiveness of its own coordination and monitoring mechanisms, and propose concrete follow-up measures within its competences, alongside recommendations for Member States.

The review should be accompanied by transparent follow-up arrangements, including clear priorities, responsible actors and timelines for addressing identified shortcomings.

2. **Establish enforceable institutional responsibilities for combating antigypsyism.** Member States and enlargement-country governments should make prevention and correction of structural and institutional discrimination an operational duty across public authorities, rather than assigning responsibility only to national Roma contact points. This requires institutional reviews, independent oversight and enforcement of equality obligations. The Commission should use available EU-law enforcement mechanisms where warranted.

3. **Ensure Roma participation translates into genuine influence.** The Commission and governments should establish transparent, adequately resourced arrangements through which Roma civil society, including independent Roma-led, grassroots, women's and youth organisations, can shape priorities, funding, implementation and evaluation. Public authorities should explain how contributions affected decisions and provide reasons when recommendations are not followed.

4. **Strengthen access to justice and accountability for discrimination by public authorities.** Member States and enlargement-country governments should ensure accessible and independent complaints and redress mechanisms, legal assistance, protection against retaliation and effective investigation of discriminatory conduct. Equality bodies and oversight institutions require sufficient independence, powers and resources. Effectiveness should be assessed through access and outcomes, not only the existence of procedures.

5. **Measure institutional and societal change rather than activities alone.** Member States and enlargement-country governments should strengthen equality data and independent evaluation, with appropriate safeguards and Roma involvement, and assess discriminatory practices, enforcement outcomes, accessibility of remedies and experiences of equality. The Commission and FRA should support comparable monitoring, while independent Roma civil society evidence should inform official assessments.

6. **Apply systematic scrutiny of antigypsyism in enlargement policies.** The Commission should assess structural discrimination, segregation, access to justice and Roma participation through enlargement reporting, reform priorities and relevant EU financial assistance, taking account of the different legal status of enlargement countries. Governments should demonstrate responsibilities, resources, implementation and measurable outcomes, with meaningful civil society monitoring.

Across these recommendations, recognition, consultation and monitoring are means rather than ends. The relevant measure of success is whether institutions change the conditions that reproduce antigypsyism and exclusion.

3.
FIGHTING POVERTY AND SOCIAL EXCLUSION

3.1. European policy commitments and progress since 2021

Reducing poverty and social exclusion is a central objective of the EU Roma Strategic Framework for Equality, Inclusion and Participation 2020–2030. The framework seeks to halve the poverty gap between Roma and the general population, including the child poverty gap, by 2030. The 2021 Council Recommendation calls on Member States to address poverty and its structural causes, improve effective access to social protection and essential services, and coordinate Roma-specific measures with mainstream social and economic policies.[15]

These commitments form part of a broader EU social policy architecture. The European Pillar of Social Rights and its 2021 Action Plan established a target of reducing the number of people at risk of poverty or social exclusion by at least 15 million by 2030, including at least five million children. Its principles on minimum income, social protection, equal opportunities, housing assistance and access to essential services are directly relevant to the persistent deprivation experienced by many Roma communities.[16]

The 2023 Council Recommendation on adequate minimum income ensuring active inclusion provides a further instrument for addressing income insecurity and barriers to social assistance. Its implementation is particularly important where documentation requirements, residence registration, digital procedures or discriminatory administrative practices prevent Roma households from accessing support. Effective social protection requires not only formal eligibility but also adequate benefit levels, accessible procedures, timely decisions and effective remedies.[17]

The European Semester offers an important mechanism for connecting Roma equality commitments with mainstream economic and social governance. Through country reports, country-specific recommendations and monitoring of national reforms, it can identify persistent inequalities and encourage corrective measures.

ERGO Network's analyses of the European Semester demonstrate, however, that increased policy visibility does not necessarily translate into meaningful policy integration. Its assessments of the 2025 and 2026 Spring Packages identify considerable variation in the treatment of Roma equality. While some documents address Roma poverty within broader socioeconomic challenges, others provide only general references or identify individual disadvantages without adequately addressing their structural causes, including antigypsyism.[18]

ERGO's research therefore highlights a fundamental distinction between acknowledging Roma inequalities

15 European Commission, A Union of Equality: EU Roma Strategic Framework for Equality, Inclusion and Participation, COM(2020) 620 final, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0620; Council Recommendation of 12 March 2021 on Roma equality, inclusion and participation (2021/C 93/01), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32021H0319(01).

16 European Commission, The European Pillar of Social Rights Action Plan, COM(2021) 102 final, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021DC0102.

17 Council Recommendation of 30 January 2023 on adequate minimum income ensuring active inclusion (2023/C 41/01), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023H0203(01).

18 ERGO Network, "European Commission releases Spring Package 2025 – What's in it for Europe's Roma?", September 2025, https://ergonetwork.org/2025/09/european-commission-releases-spring-package-2025-whats-in-it-for-europes-roma/; ERGO Network, "European Commission releases Spring Package 2026 – What's in it for Europe's Roma?", September 2026, https://ergonetwork.org/2026/09/european-commission-releases-spring-package-2026-whats-in-it-for-europes-roma/.

and incorporating them into concrete national reform priorities, financing arrangements and accountability mechanisms. The presence of Roma-related references in European Semester documents cannot, by itself, establish that the relevant policies are designed or implemented to overcome the barriers Roma encounter.

This concern is also central to ERGO Network's 2025 position paper, Ending Roma Poverty in the EU, which approaches Roma poverty as a structural justice issue rather than solely a matter of household income or individual disadvantage. It calls for stronger integration of antigypsyism into mainstream anti-poverty measures, adequate and accessible social protection, and policy assessments capable of identifying whether public interventions effectively reach Roma communities.[19]

The adoption of the first EU Anti-Poverty Strategy in 2026 introduces an additional framework for coordinated European action. Its recognition of multidimensional poverty and the importance of income support, employment, access to services and social inclusion is relevant to Roma equality. However, as ERGO Network's assessment of the strategy emphasises, important limitations remain, including the absence of additional dedicated funding, new binding poverty-reduction targets and sufficiently strong accountability mechanisms within the European Semester.[20]

These shortcomings are particularly significant for Roma communities, whose persistent exposure to poverty reflects not only socioeconomic disadvantage but also structural and institutional discrimination. Without explicit attention to antigypsyism and mechanisms of exclusion, mainstream poverty-reduction measures may reproduce existing inequalities even when they are formally designed to benefit everyone.

The new strategy nevertheless creates an opportunity to connect Roma-specific equality commitments with broader EU social policy implementation. Its effectiveness for Roma communities will depend on whether these connections are translated into measurable objectives, institutional responsibilities, adequate resources and monitoring arrangements. Given its recent adoption, the strategy's impact cannot yet be assessed through ERGO's 2026 monitoring survey.

The Commission's assessments of national Roma strategic frameworks and FRA population-based research continue to document persistent inequalities in living conditions and access to rights. These findings underline the importance of examining not only the existence of EU and national commitments but also the effectiveness of the mechanisms intended to deliver them.[21]

The Commission's 2026 implementation report, drawing on the Roma Survey 2024, reports that 77% of surveyed Roma children were at risk of poverty and 40% lived in households experiencing severe material deprivation. It highlights practical outreach, including bridging figures in Flanders, while acknowledging that many measures focus on access to benefits without adequately addressing structural causes of poverty.[22]

3.2. ERGO Network's 2026 civil society monitoring findings

ERGO Network's 2026 civil society survey examined implementation of Roma poverty-reduction measures, changes in poverty and social exclusion since 2021, and effective access to social protection and essential support.

19 ERGO Network, Ending Roma Poverty in the EU, position paper (2025), https://ergonetwork.org/wp-content/uploads/2025/10/ERGO-Network-Ending-Roma-poverty-in-the-EU-Position-paper-FINAL.pdf.

20 ERGO Network, "The European Commission released first EU Anti-Poverty Strategy – What's in it for Europe's Roma?", May 2026, https://ergonetwork.org/2026/05/the-european-commission-released-first-eu-anti-poverty-strategy-whats-in-it-for-europes-roma/.

21 European Commission, Report on the implementation of national Roma strategic frameworks, COM(2024) 422 final, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52024DC0422; European Union Agency for Fundamental Rights, Roma Survey 2024: Selected findings (2025).

22 European Commission, COM(2026) 602 final, section II.II.

EU Member States

Implementation of poverty-reduction measures. Nineteen of 35 respondents (54%) assessed implementation as limited and seven (20%) reported no implementation. Eight respondents (23%) considered measures partially implemented, while only one reported full implementation. None selected largely implemented. Overall, 26 of 35 respondents (74%) considered implementation limited or absent.

Change since 2021. Twenty-two respondents (63%) reported no significant change in Roma poverty and social exclusion, while nine (26%) perceived some worsening. Only three respondents (9%) observed some improvement, and one did not know. No respondent reported significant improvement.

Access to social protection and essential support. Only two respondents (6%) reported systematic implementation of measures improving effective access to minimum-income schemes, social security and social assistance. Twenty respondents (57%) reported partial or limited action, twelve (34%) reported no implementation, and one did not know.[23]

The findings indicate that respondents perceive substantial weaknesses in both poverty-reduction measures and access to social protection. The latter is particularly significant given the central role assigned to adequate income support and accessible services under the European Pillar of Social Rights and the 2023 Council Recommendation on adequate minimum income.

Enlargement countries

Implementation of poverty-reduction measures. Six of 16 respondents reported partial implementation, six limited implementation and four no implementation. None reported full or largely implemented measures. Overall, ten of 16 respondents assessed implementation as limited or absent.

Change since 2021. Four respondents reported some improvement in Roma poverty and social exclusion, eight reported no significant change, and three reported some worsening. One additional respondent selected both "no significant change" and "somewhat worsened". Accordingly, twelve of 16 respondents (75%) did not report an improvement, while four (25%) perceived some improvement. None reported significant improvement.

Access to social protection. Two respondents reported systematic measures to improve access to social protection and essential support; nine reported partial or limited implementation, four reported none and one did not know.[24]

These findings point to considerable implementation challenges. In enlargement countries, poverty-reduction policies also need to be examined in relation to informal employment, social insurance coverage, administrative registration, local government capacity and access to public funding. The survey does not, however, establish the prevalence or relative importance of these barriers in individual countries.

3.3. Key assessment and conclusions

The 2026 monitoring findings reveal a substantial gap between Roma poverty-reduction commitments and civil society assessments of implementation. Across both the EU and enlargement samples, respondents predominantly describe measures as limited, partial or absent. Only one EU respondent and no enlargement respondent reported full implementation.

These findings are particularly concerning in the context of successive EU social policy initiatives. The EU Roma Framework, European Pillar of Social Rights, European Semester and more recent anti-poverty

23 ERGO Network, September–October 2026 civil society monitoring survey, EU Member States aggregate response export, Q20–Q22 (35 responses).

24 ERGO Network, September–October 2026 civil society monitoring survey, enlargement individual responses and corrected 16-response sample, Q20–Q22. For Q21, one respondent selected both "no significant change" and "somewhat worsened"; the count is therefore expressed at respondent level, without double-counting.

measures provide complementary instruments for addressing deprivation. Yet their coexistence has not ensured the systematic integration of Roma equality into mainstream social and economic policies.

The central problem is not simply a lack of policy commitments, but the limited translation of those commitments into coordinated institutional action, adequate resources and measurable outcomes.

ERGO's European Semester research illustrates this problem. Increased recognition of Roma inequalities in policy documents represents an important development, but recognition alone does not establish responsibility for implementation. Where country reports identify Roma poverty without corresponding reform priorities, resources or monitoring requirements, the potential of the European Semester to address structural exclusion remains underused.

This reflects a wider fragmentation of institutional responsibilities. National Roma contact points are often expected to coordinate inclusion policies but may lack the authority to influence mainstream social protection systems or national budgetary decisions. At the same time, ministries responsible for social affairs, employment, housing and public administration may implement general policies without systematically assessing their accessibility and effectiveness for Roma.

The result can be a form of institutional displacement of responsibility: Roma poverty is acknowledged as a problem requiring action, while the authorities with the greatest capacity to address its structural causes are not consistently held accountable for results.

ERGO's poverty research also demonstrates why Roma poverty cannot be understood solely through income indicators. Structural antigypsyism influences access to employment, housing, education, public services and social protection. Discrimination and segregation restrict opportunities, while administrative exclusion and inadequate social assistance can reinforce deprivation. These mechanisms interact and contribute to the persistence of poverty across generations.

Consequently, policies that focus primarily on temporary assistance, isolated projects or individual employability may alleviate immediate hardship without transforming the institutional conditions that reproduce exclusion. Equally, mainstream measures that do not account for unequal starting conditions may fail to reach those facing the greatest barriers.

Access to social protection illustrates this problem particularly clearly. Formal eligibility does not guarantee that a household can obtain assistance. Excessive documentation requirements, difficulties with residence registration, inaccessible digital procedures, delayed decisions and discriminatory treatment can prevent access to benefits. Even where support is received, inadequate benefit levels may leave households exposed to severe deprivation.

The 2026 EU Anti-Poverty Strategy provides an opportunity to strengthen the relationship between Roma equality and mainstream social policy. However, ERGO's assessment identifies limitations that need to be addressed during implementation, particularly regarding funding, measurable commitments and accountability.

For Roma communities, this requires explicit attention to structural antigypsyism, administrative exclusion and the unequal distribution of resources and services. General commitments to reach vulnerable groups are insufficient unless supported by mechanisms capable of identifying who remains excluded and why.

The implications extend to the European Semester. The Commission's economic and social policy coordination should not merely document Roma inequalities but, where appropriate, connect them to concrete reform priorities, national implementation responsibilities and measurable follow-up. This is especially important when the same barriers persist across successive reporting cycles.

The findings also raise questions about how progress is measured. Counting programmes, beneficiaries or policy references does not establish whether poverty gaps are narrowing, material conditions are improving or access to social protection has become more equitable. Outcome monitoring must be complemented by independent Roma civil society evidence capable of identifying barriers that aggregate socioeconomic indicators may conceal.

The overarching conclusion is that Roma poverty reduction remains insufficiently embedded in mainstream social and economic governance. The persistence of these gaps, despite two successive EU Roma frameworks and an increasingly developed EU social policy agenda, calls for stronger institutional accountability, rather than another cycle of commitments without clear responsibilities for implementation.

3.4. Recommendations

1. **Integrate Roma equality into the implementation of the EU Anti-Poverty Strategy and European Pillar of Social Rights.** The European Commission and Member States should ensure that the implementation of the EU Anti-Poverty Strategy explicitly addresses Roma poverty and its structural causes, including antigypsyism and institutional discrimination. National anti-poverty policies should be aligned with national Roma strategic frameworks and supported by clear institutional responsibilities, adequate resources, measurable objectives and transparent monitoring. The Commission should assess whether the strategy's implementation mechanisms are sufficient to address inequalities affecting Roma and other groups experiencing structural exclusion.

2. **Strengthen Roma poverty reduction within the European Semester.** The Commission should systematically examine Roma poverty and structural exclusion in relevant country reports and, where justified by the evidence, address them through country-specific recommendations. These assessments should consider discriminatory barriers to mainstream policies, not only socioeconomic disparities. Member States should demonstrate how relevant findings and recommendations inform national reforms, budgetary decisions and measurable outcomes.

3. **Ensure adequate and non-discriminatory access to minimum income and social protection.** Member States should implement the 2023 Council Recommendation on adequate minimum income with particular attention to groups experiencing structural exclusion. Authorities should assess benefit adequacy, coverage and non-take-up, remove unnecessary administrative barriers, provide accessible in-person and offline services, and ensure effective remedies against discriminatory treatment. Monitoring should examine actual access and the capacity of benefits to prevent deprivation, rather than formal eligibility alone.

4. **Establish clear responsibilities across mainstream public authorities for Roma poverty reduction.** Governments should ensure that ministries responsible for social protection, employment, public administration and other relevant sectors are accountable for implementing the poverty-reduction objectives of national Roma strategies. These responsibilities should be reflected in budgets, implementation plans, monitoring arrangements and public reporting. National Roma contact points should facilitate coordination but should not substitute for the responsibilities of competent ministries and public authorities.

5. **Address structural antigypsyism within mainstream anti-poverty policies.** The Commission, Member States and enlargement-country governments, within their respective policy frameworks, should assess whether general poverty-reduction measures reach Roma experiencing discrimination, segregation and administrative exclusion. Policy design and evaluation should examine the distributional effects of social spending and identify barriers that prevent Roma households from benefiting equally. Where measures are ineffective, responsible authorities should introduce corrective action. Detailed recommendations concerning housing, education, employment and child poverty should be addressed in the corresponding thematic chapters.

6. **Strengthen independent monitoring, meaningful Roma participation and accountability for outcomes.** The Commission and national authorities should monitor progress towards the EU Roma Framework's poverty-reduction objectives using reliable, rights-compliant evidence, including appropriately safeguarded equality data and independent civil society assessments. Roma-led organisations, including Roma women's organisations, should participate meaningfully in the design, implementation and evaluation of mainstream anti-poverty policies. Where implementation gaps persist, responsible authorities should publish corrective measures, timelines and follow-up arrangements.



4.

ROMA PARTICIPATION, EMPOWERMENT AND INFLUENCE IN DECISION-MAKING

4.1. European policy commitments and civic space standards

The EU Roma Strategic Framework 2020–2030 recognises Roma participation both as a specific objective and as a horizontal requirement for effective equality and inclusion policies. The 2021 Council Recommendation calls for the involvement of Roma, including Roma women and young people, in the design, implementation, monitoring and evaluation of policies affecting them. These commitments require more than the existence of consultation mechanisms. Their effectiveness should be assessed by examining whether Roma organisations can influence policy priorities, decisions, resource allocation and implementation, and whether public authorities are accountable for how their contributions are taken into consideration.[25]

The European Commission's 2024 implementation report identified national Roma platforms or equivalent consultation arrangements in 18 Member States, as well as Roma and/or pro-Roma NGOs as full members of EU-funded programme monitoring committees in ten Member States. These arrangements provide institutional entry points, but do not establish whether participating organisations have effective decision-making rights, whether their contributions change policy outcomes, or whether the diversity of Roma civil society is represented.[26]

Participation must also be considered within the broader framework of fundamental rights and civic space. Freedom of association, expression and peaceful assembly are indispensable to independent civil society engagement. Article 11 of the Treaty on European Union provides for open, transparent and regular dialogue between EU institutions and representative associations and civil society. Commission Recommendation (EU) 2023/2836 sets out guidance on promoting engagement and effective participation in public policymaking, including timely, accessible and inclusive participation and feedback on contributions.[27]

The EU Strategy for Civil Society, adopted in 2025, places stronger civil society engagement, protection of civic space and sustainable support on the EU policy agenda. Its relevance to the EU Roma Framework is substantial: meaningful participation cannot be secured through consultation mechanisms alone if independent Roma-led organisations lack stable resources, face intimidation or discrimination, or are excluded from wider democratic and policy processes.[28]

The EU Agency for Fundamental Rights has documented persistent pressures on civic space, including

25 European Commission (2020), A Union of Equality: EU Roma Strategic Framework for Equality, Inclusion and Participation, COM(2020) 620 final, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0620; Council Recommendation of 12 March 2021 on Roma equality, inclusion and participation (2021/C 93/01).

26 European Commission (2024), Report on the implementation of the national Roma strategic frameworks, COM(2024) 422 final, section 1.6, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52024DC0422.

27 Consolidated version of the Treaty on European Union, Article 11; Charter of Fundamental Rights of the European Union, Articles 11 and 12; Commission Recommendation (EU) 2023/2836 of 12 December 2023 on promoting the engagement and effective participation of citizens and civil society organisations in public policy-making processes, https://eur-lex.europa.eu/eli/reco/2023/2836/oj.

28 European Commission (2025), EU Strategy for Civil Society, Commission communication, November 2025.

funding insecurity, attacks on rights organisations and weaknesses in participation mechanisms. These challenges interact with structural antigypsyism, which can affect the recognition accorded to Roma organisations, their access to institutions and funding, and their capacity to exercise independent scrutiny.[29]

The Commission's own commitments are also relevant. While Member States bear primary responsibility for organising national participation mechanisms, the Commission has responsibilities within its competences for EU-level dialogue, funding programmes, implementation reporting and monitoring of national Roma frameworks. The mid-term review should examine how EU mechanisms support independent participation and whether their effectiveness is assessed.

The Commission's 2026 report identifies strengthened formal dialogue and national coordination arrangements, including Cyprus's monitoring committee with Roma representatives. Such mechanisms provide opportunities for participation, but their existence should be assessed separately from Roma civil society's actual influence over priorities, budgets and corrective decisions.[30]

4.2. ERGO Network's 2026 civil society monitoring findings

ERGO Network's 2026 civil society survey examined whether Roma organisations can influence policy design, implementation and monitoring, their representation in decision-making structures, and the adequacy of resources and support for civic and political participation.

EU Member States

The survey findings point to a substantial gap between formal participation arrangements and respondents' assessments of their effectiveness. Only three of 35 respondents considered Roma civil society systematically involved in implementation, monitoring and review of national Roma strategies. Twenty reported limited participation and twelve reported no meaningful involvement. Thus, 32 of 35 respondents (91%) assessed participation as limited or absent.[31]

Fifteen respondents confirmed that Roma organisations participated in relevant national or regional implementation or monitoring bodies, while fifteen reported no representation. Two indicated that no such body existed and three did not know. Only two respondents, from Finland and Croatia, unequivocally reported full decision-making or voting rights for Roma NGOs. Twelve reported such rights only in some bodies or to a limited extent, while seventeen reported none. Representation within a structure does not necessarily provide influence over its decisions.

All 35 respondents considered financial or technical support for participation inadequate: twenty described support as insufficient and fifteen reported none. On broader measures to strengthen Roma civic and political participation, nineteen reported no relevant measures and fourteen reported limited implementation, while two did not know.

Enlargement countries

Four of sixteen respondents reported systematic Roma civil society involvement in implementation and monitoring, ten reported limited involvement and two reported none. Thus, twelve of sixteen respondents (75%) assessed involvement as limited or absent.[32]

29 European Union Agency for Fundamental Rights (2026), Civic Space Update, March 2026.

30 European Commission, COM(2026) 602 final, section I.

31 ERGO Network (2026), Civil society monitoring survey on national Roma strategic frameworks, EU Member States response export, questions 23–27. The figures report respondents' assessments, not statistically representative country ratings.

32 ERGO Network (2026), Civil society monitoring survey on national Roma strategic frameworks, enlargement country response export, questions 23–27. The figures report respondents' assessments, not statistically

Six respondents confirmed Roma representation in implementation or monitoring bodies, four reported none and six indicated that no relevant body existed. No respondent unequivocally confirmed full decision-making or voting rights. Six reported partial rights, three reported none and seven considered the question inapplicable.

Twelve respondents reported no financial or technical support, three described it as insufficient and one did not know. Nine reported no measures to strengthen Roma civic and political participation, while seven reported limited implementation. Across both survey groups, the consistency of responses points to substantial weaknesses in authority, resources and sustained engagement.

4.3. Comparative assessment and key conclusions

The findings expose a fundamental weakness in the implementation of participation commitments under the EU Roma Strategic Framework: institutional access is too often treated as evidence of participation, without examining whether it enables Roma organisations to exercise influence. The Commission's reporting on national Roma platforms and monitoring committee membership and the more critical civil society assessments are not necessarily contradictory. They capture different dimensions: institutional arrangements on the one hand, and respondents' experience of participation, decision-making rights and support on the other.

First, participation appears particularly weak during implementation and monitoring, when decisions on resources, administrative measures and corrective action are taken. Roma organisations may be consulted during strategy preparation yet have fewer opportunities to influence delivery. Second, the absence of decision-making rights and inadequate resources limit participation even where representation exists. Organisations cannot be expected to review complex policies, attend repeated consultations or monitor implementation independently without appropriate support.

Third, these weaknesses are compounded by shrinking civic space. FRA's March 2026 Civic Space Update reported that 75% of responding fundamental-rights organisations faced barriers to their work in 2024. Organisations defending Roma and other marginalised groups were among those reporting the most in-person threats and attacks. Funding insecurity and weaknesses in consultation procedures can further undermine the independence and effectiveness of civil society participation.[33]

These pressures have direct implications for Roma civil society. Organisations facing intimidation, insecure funding or discriminatory treatment may be less able to challenge institutional decisions or engage consistently in policymaking. Public authorities should not equate constructive participation with agreement, or treat independent criticism as grounds for exclusion from dialogue or funding.

The Commission's 2023 Recommendation provides useful benchmarks: early involvement, sufficient time and resources, accessible information, inclusion of marginalised groups and feedback on consultation outcomes. The 2025 EU Strategy for Civil Society adds commitments on stronger dialogue, protection and support. Their implementation should be examined for the extent to which Roma-led, grassroots, women's and youth organisations can benefit in practice.[34]

representative country ratings.

33 European Union Agency for Fundamental Rights (2026), Civic Space Update, March 2026. The 75% figure concerns organisations responding to FRA's consultation, not all EU civil society organisations.

34 Commission Recommendation (EU) 2023/2836, especially its guidance on participation in public policy-making; European Commission (2025), EU Strategy for Civil Society.

The mid-term review should therefore assess whether Roma participation has changed decisions, rather than merely counting meetings, platforms or organisations consulted. Voting rights can be relevant, but influence also depends on agenda-setting, access to decision-makers, institutional responsiveness, independent scrutiny and demonstrable policy changes. These dimensions should be assessed without assuming that participation by established organisations necessarily reflects the diversity of Roma communities.

4.4. Recommendations

1. **Move from consultation to demonstrable influence.** Member States s and enlargement-country governments hould involve Roma civil society from the earliest stages of policy development through implementation, monitoring and evaluation. Authorities should publish consultation outcomes, explain how recommendations were considered and identify decisions influenced by Roma participation.

2. **Strengthen representation and decision-making rights.** Relevant ministries and national Roma contact points should review the composition, mandates and functioning of Roma participation mechanisms, including voting rights where applicable, transparent selection procedures and the involvement of Roma-led organisations.

3. **Guarantee independent and adequately resourced participation.** The Commission and national authorities should provide accessible, predictable support for Roma civil society advocacy, policy engagement and independent monitoring, including grassroots organisations. Support should not be conditioned on agreement with government positions.

4. **Protect Roma civil society within broader civic space policies.** Governments should apply the principles of Commission Recommendation (EU) 2023/2836, address intimidation and discriminatory barriers, and safeguard freedom of association, expression and peaceful assembly. Roma organisations should be included in civic space monitoring and protection measures.

5. **Apply the EU Civil Society Strategy to Roma participation.** The Commission should ensure that Roma-led organisations can access the Strategy's dialogue and support mechanisms, assess barriers to their participation, and take account of their specific circumstances in implementing EU civil society initiatives.

6. **Measure influence in the EU Roma Framework mid-term review.** The Commission should assess the timing, inclusiveness, independence, resources and decision-making authority associated with participation mechanisms, alongside documented policy changes resulting from Roma civil society input. The review should distinguish Member State responsibilities from the effectiveness of the Commission's own coordination, dialogue, funding and monitoring mechanisms.

7. **Strengthen participation in enlargement monitoring.** The Commission should assess whether Roma organisations can meaningfully influence national Roma strategies and relevant reform processes in enlargement countries, including where participation bodies are absent or lack decision-making authority.

5.
EDUCATION: EQUAL ACCESS, INCLUSION AND DESEGREGATION

5.1. European policy commitments and progress since 2021

In its 2026 assessment, the Commission reports that Bulgaria has reached certain national targets on pre-primary participation and upper-secondary attainment, while Czechia has made limited or no progress towards its 2030 national targets. The Commission also confirms ongoing infringement proceedings concerning Roma segregation in education against Czechia, Hungary and Slovakia, with Slovakia referred to the Court of Justice. Progress in selected indicators must therefore be considered alongside continuing segregation and enforcement concerns.[35]

The EU Roma Strategic Framework 2020–2030 establishes ambitious objectives for improving Roma access to quality, inclusive mainstream education, reducing school segregation and increasing participation in early childhood education and completion of upper-secondary education. The 2021 Council Recommendation on Roma equality, inclusion and participation calls on Member States to prevent and eliminate segregation, address discrimination and ensure effective equal access throughout the educational pathway.[36]

These commitments must be assessed against the continued scale of educational inequality. The EU Agency for Fundamental Rights (FRA), in its 2025 publication of the Roma Survey 2024 findings, reported that 53% of Roma and Traveller children participated in early childhood education, compared with 95% of children in the EU general population. Among Roma and Travellers aged 20–24, only 32% had completed at least upper-secondary education, compared with 84% of the general population. Furthermore, 46% of surveyed Roma and Traveller children aged 6–15 attending education were enrolled in schools where all or most pupils were Roma or Travellers. These figures concern the populations and countries covered by the survey and should not be interpreted as administrative statistics for the entire EU.[37]

The extent of segregation varies considerably. FRA reported particularly high concentrations of Roma pupils in schools attended predominantly by Roma children in Bulgaria (70%), Hungary (62%) and Czechia (58%), compared with Spain (28%) and Italy (6%). However, lower levels of school concentration do not necessarily indicate the absence of discriminatory treatment, unequal educational outcomes or other barriers to inclusion. FRA also reported an increase in perceived discrimination in contact with schools, from 7% in 2016 to 14% in the latest survey.[38]

The European Commission's 2024 implementation report acknowledged slow progress in educational desegregation. It identified local or regional desegregation programmes or plans reported by only three

35 European Commission, COM(2026) 602 final, sections I, II.IV and IV.

36 European Commission (2020), A Union of Equality: EU Roma strategic framework for equality, inclusion and participation for 2020–2030, COM(2020) 620 final; Council Recommendation of 12 March 2021 on Roma equality, inclusion and participation (2021/C 93/01).

37 European Union Agency for Fundamental Rights (2025), Roma Survey 2024: findings on education, early childhood participation, upper-secondary attainment and school segregation. Check final publication title and link before publication.

38 European Union Agency for Fundamental Rights (2025), Roma Survey 2024, country-level school segregation and discrimination findings. Check figures against the final source before publication.

Member States—Czechia, Spain and Hungary—despite the broader recognition of educational and spatial segregation across national Roma frameworks.[39]

The continued infringement proceedings concerning discrimination against Roma children in education in Czechia, Hungary and Slovakia, including the Commission's referral of Slovakia to the Court of Justice of the EU in 2023, demonstrate that educational segregation is not merely a matter of insufficient social inclusion measures. Where discriminatory practices fall within the scope of EU equal treatment law, they also raise questions of legal compliance and effective enforcement.[40]

The persistence of segregation must also be examined in light of the European Court of Human Rights' case law concerning discriminatory educational placement and segregation of Roma children. Judgments such as D.H. and Others v. the Czech Republic, Oršuš and Others v. Croatia and Horváth and Kiss v. Hungary established important standards concerning indirect discrimination, segregated education and discriminatory assessment practices. Their continuing relevance lies in the need to examine whether educational systems have addressed the institutional mechanisms identified in these judgments, rather than treating individual legal decisions as sufficient remedies.[41]

Residential segregation, school catchment arrangements, admissions practices, parental school choice and the placement of Roma children in separate classes or special education can reinforce educational exclusion. However, residential concentration cannot justify discriminatory educational arrangements or relieve public authorities of their responsibilities to provide equal access to quality mainstream education.

Romania's first national reporting exercise on school segregation risks for the 2024–2025 school year, published in January 2026, offers a potentially important example of institutional monitoring. Its significance will depend on whether the identification of segregation risks is followed by corrective measures, adequate resources and demonstrable changes in school composition and educational outcomes.[42]

ERGO Network's forthcoming 2026 synthesis report on Roma child poverty and the prevention of family separation, drawing on national research in Bulgaria, Czechia, Hungary, Romania, Slovakia and Spain, reinforces the need to examine educational inequality as the combined result of antigypsyism, segregation, discriminatory institutional practices and material barriers to learning. The research documents the continued concentration of Roma pupils in segregated schools or classes, unequal educational resources and expectations, and disproportionate placement in special education in several countries.[43]

5.2. ERGO Network's 2026 civil society monitoring findings

ERGO Network's 2026 civil society survey examined the implementation of measures to end segregation

39 European Commission (2024), Report on the implementation of the national Roma strategic frameworks in light of the EU Roma strategic framework for equality, inclusion and participation and the Council Recommendation on Roma equality, inclusion and participation, COM(2024) 422 final, Brussels, 25 September 2024. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52024DC0422

40 European Commission (2024), Report on the implementation of the national Roma strategic frameworks, COM(2024) 422 final, section on education (infringement proceedings against Czechia, 2014; Slovakia, 2015; and Hungary, 2016); European Commission (2024), October infringement package: key decisions, 3 October 2024 (additional letter of formal notice to Czechia, INFR(2014)2174); Court of Justice of the European Union, European Commission v Slovak Republic, Case C-799/23, action lodged 22 December 2023, OJ C/2024/1402..

41 European Court of Human Rights, D.H. and Others v. the Czech Republic [GC], no. 57325/00 (2007); Oršuš and Others v. Croatia [GC], no. 15766/03 (2010); Horváth and Kiss v. Hungary, no. 11146/11 (2013).

42 Ministry of Education and Research of Romania (2026), Analiza riscurilor de segregare școlară în sistemul de educație din România. Raport național pentru anul școlar 2024–2025 [Analysis of School Segregation Risks in Romania's Education System: National Report for the 2024–2025 School Year], published 29 January 2026. Ministry of Education and Research of Romania (2026), Analiza riscurilor de segregare școlară în sistemul de educație din România. Raport național pentru anul școlar 2024–2025 [Analysis of School Segregation Risks in Romania's Education System: National Report for the 2024–2025 School Year], published 29 January 2026. https://www.edu.ro/sites/default/files/Raport_National_Analiza_riscurilor_de_segregare_%C8%99colara_in_sistemul_de_educatie_din_Romania_2024_2025.pdf

43 ERGO Network (2026), Roma child poverty and the prevention of family separation in Bulgaria, Czech Republic, Hungary, Romania, Slovakia and Spain, synthesis report, November 2026

in education, progress since 2021, participation in early childhood education and barriers to inclusive, quality schooling.

EU Member States

Implementation of anti-segregation measures. Of the 35 respondents, four reported no implementation of measures to prevent or eliminate segregation, fifteen described implementation as limited and eight as partial. Only four assessed implementation as largely or fully achieved, while four provided uncertain or non-substantive responses. Overall, 27 of 35 respondents assessed implementation as absent, limited or partial.

Progress since 2021. Eighteen respondents reported little or no progress in reducing segregation, while four reported regression. Five identified some progress and five significant progress, with three providing uncertain or inapplicable responses. These assessments indicate substantial concern about the effectiveness of measures introduced or continued since the adoption of the current EU Roma Framework.

Early childhood education. Fifteen respondents perceived increased Roma participation in early childhood education, eight reported no increase, six did not know and six provided qualified responses. Although some respondents identified improvements, these assessments cannot establish the extent of progress without corresponding enrolment, attendance and completion data.

Safety, acceptance and discrimination in schools. Twenty-one respondents reported no improvement since 2021 in Roma students' experience of safety, acceptance and discrimination. Ten reported partial improvement, one answered positively, one did not know and two provided qualified responses. This finding raises concerns about whether measures aimed at educational inclusion sufficiently address discriminatory school environments.

Secondary and tertiary education. Fourteen respondents reported no targeted measures to support Roma students' completion of secondary and tertiary education, while sixteen described measures as limited. Only two reported systematic measures, two provided qualified assessments and one did not know. The findings suggest that progression and completion remain insufficiently supported beyond compulsory education.

Enlargement countries

Implementation of anti-segregation measures. Three of sixteen respondents reported no implementation, one limited implementation and nine partial implementation. Three considered measures largely implemented, while none reported full implementation. Thus, 13 of 16 respondents assessed implementation as absent, limited or partial.

Progress since 2021. Six respondents reported little or no progress, seven some progress and two significant progress, while one did not know. These assessments are more mixed than those from EU Member States and do not support a uniform conclusion across enlargement countries.

Early childhood education. Five respondents perceived increased Roma participation, eight reported no increase, one did not know and two provided qualified responses. The findings indicate continuing concerns about access to early childhood education, although they do not establish country-level enrolment trends.

Safety, acceptance and discrimination in schools. Six respondents reported no improvement, eight partial improvement, one improvement and one did not know. The findings underline the need to assess school environments alongside enrolment and attainment.

Secondary and tertiary education. Twelve respondents described targeted completion measures as limited, two reported none and two considered measures systematic. As in the EU sample, support for educational progression appears insufficient in many respondents' assessments.

5.3. Comparative assessment and key conclusions

The survey findings, read alongside FRA evidence, the Commission's implementation reporting and ERGO's national research, point to a persistent gap between education commitments and their implementation.[44]

The first concern is the limited effectiveness of desegregation measures. Despite longstanding legal standards, policy commitments and national Roma strategies, educational segregation remains widespread. The fact that 27 of 35 EU respondents and 13 of 16 enlargement respondents assessed anti-segregation measures as absent, limited or only partially implemented raises questions about whether national education systems have established the institutional responsibilities, resources and monitoring necessary to deliver change.

A distinction must be made between identifying segregation, adopting desegregation measures and demonstrating results. National or local plans are important only insofar as they address discriminatory placement, admissions and school organisation, improve access to inclusive mainstream education and produce measurable changes. Similarly, the collection of segregation-risk data is an essential first step but cannot substitute for corrective action.

A second concern is the persistence of discriminatory educational pathways. ERGO's 2026 national research documents the disproportionate placement of Roma children in special education in Bulgaria, Czechia, Hungary and Slovakia. It identifies risks arising from biased assessment practices, the interpretation of poverty or language differences as educational deficiencies, and institutional decisions that can restrict children's access to mainstream curricula and future opportunities.[45]

The research includes a Hungarian case in which children were placed in special educational needs classes despite concerns about the appropriateness of the assessment and placement decisions. Such examples illustrate why effective safeguards, independent assessment and access to remedies remain essential. They also reinforce the relevance of established European human rights jurisprudence concerning discriminatory educational placement.

Third, educational inequality cannot be reduced to school enrolment or attendance. ERGO's research identifies persistent barriers arising from overcrowded or insecure housing, insufficient access to school supplies and digital equipment, transport difficulties, food insecurity and limited availability of educational support. These conditions can affect attendance, concentration and achievement, while discriminatory assumptions about Roma parents or children's abilities can aggravate exclusion.

Public institutions must distinguish between difficulties arising from material deprivation and parental unwillingness to support education. Where school attendance is affected by poverty, housing instability or lack of transport, the appropriate response should prioritise practical support, mediation and access to services rather than punitive measures that may further destabilise families. The broader implications for child protection and family separation are addressed separately in the chapter on Roma children.

Fourth, school inclusion must be assessed through children's experiences of equal treatment and belonging. Twenty-one EU respondents and six enlargement respondents reported no improvement in Roma students' safety, acceptance and exposure to discrimination. These assessments, although not representative measures of school conditions, indicate that increased participation alone cannot demonstrate progress where racist bullying, discriminatory treatment or low expectations persist.

Finally, progression beyond compulsory education requires greater attention. The substantial gaps in upper-secondary completion documented by FRA, combined with respondents' assessments of limited targeted

44 ERGO Network (2026), civil society monitoring survey on implementation of national Roma strategic frameworks, September–October 2026; EU Member State and enlargement-country responses. See report introduction for methodology.

45 ERGO Network (2026), national case studies on Roma child poverty and the prevention of family separation: Bulgaria (Integro Association), Czechia (Life Together), Hungary (Autonómia Foundation), Romania (Sastipen), Slovakia (Roma Advocacy and Research Centre), and Spain (FAGiC), November 2026

support, suggest that education systems need sustained measures addressing retention, transitions, qualifications and access to further study. Such measures should respond to the particular barriers affecting Roma girls, young people in poverty, children with disabilities and pupils living in segregated or geographically isolated communities, without reinforcing stereotypes or lowering educational expectations.

The effectiveness of the EU Roma Framework should therefore be assessed through educational outcomes and the removal of discriminatory barriers, not merely through the adoption of strategies, programmes or consultation processes. This requires clearer accountability among education ministries, municipalities, school authorities, inspectorates and the institutions responsible for managing and monitoring relevant EU funding.

5.4. Recommendations

1. **Establish effective, time-bound desegregation measures.** Member States and enlargement-country governments should adopt and implement desegregation plans with clear institutional responsibilities, school-level objectives, adequate budgets and publicly reported results. Measures should address discriminatory placement, admissions practices, segregation within schools and the effects of residential segregation on access to mainstream education.

2. **Strengthen enforcement of anti-discrimination law and access to remedies.** The European Commission should continue to use its enforcement powers where discriminatory practices breach EU law, while national governments, including those of enlargement countries, should ensure effective domestic oversight and remedies. School inspectorates, equality bodies and other competent institutions should be equipped to identify and address segregation and discriminatory treatment.

3. **Prevent discriminatory special-education placement.** Education authorities should review assessment and placement procedures, ensure that decisions are based on children's individual educational needs rather than ethnic origin or socio-economic disadvantage, and provide independent review and effective routes into mainstream education.

4. **Ensure that EU and national education funding supports desegregation.** The Commission and relevant managing authorities should assess segregation risks in funded education measures, prevent investments that create or perpetuate segregated provision and monitor whether expenditure contributes to inclusive educational outcomes.

5. **Address material barriers to educational participation.** Governments should ensure access to affordable and inclusive early childhood education, school transport, meals, learning materials, digital resources, tutoring and other support necessary for children experiencing poverty. Measures should be designed with Roma families and community organisations and integrated into mainstream education and social protection systems.

6. **Combat antigypsyism within educational institutions.** Member States and enlargement-country governments should strengthen measures against racist bullying, discriminatory treatment and low educational expectations, including effective complaints mechanisms, appropriate professional training and monitoring of school environments. Roma children and parents should have accessible and safe ways to report discrimination.

7. **Support educational progression and completion.** Education authorities should strengthen measures supporting Roma pupils' transition to and completion of secondary and tertiary education, including mentoring, scholarships, academic support and assistance with education-related costs. Particular attention should be given to barriers affecting Roma girls, pupils with disabilities and children in marginalised communities.

8. **Assess implementation and outcomes in the EU Roma Framework mid-term review.** The European Commission should examine whether national commitments and reported measures have produced measurable reductions in segregation and discrimination, improved educational attainment and effective access to inclusive education. The assessment should distinguish the existence of policies from their implementation and results, and identify follow-up measures within the Commission's competences alongside recommendations to Member States.

9. **Apply equivalent scrutiny in enlargement monitoring.** The Commission should assess the effectiveness of desegregation, anti-discrimination safeguards and educational inclusion measures in enlargement countries, drawing on independent civil society evidence and examining whether relevant reforms and EU-supported programmes produce measurable improvements.



6.
EMPLOYMENT AND EQUAL ACCESS TO THE LABOUR MARKET

6.1. European policy commitments and progress since 2021

The Commission's 2026 assessment finds that the employment objective is currently the only EU Roma Framework objective on track, based on the indicators available. This is a qualified EU-level assessment: it does not establish equal treatment in recruitment, job quality or sustainable employment across Member States. ERGO's civil society findings should therefore continue to be presented separately from the population-survey trends.[46]

Employment is a central priority of the EU Roma Strategic Framework 2020–2030. The framework sets targets for narrowing the employment gap between Roma and the general population, including the gender employment gap, and reducing the proportion of young Roma not in employment, education or training. The 2021 Council Recommendation on Roma equality, inclusion and participation calls on Member States to improve access to quality and sustainable employment, vocational education and training, employment services and entrepreneurship, while addressing discrimination in recruitment and at work.[47]

The implementation of these commitments must be assessed against persistent structural inequalities. The European Union Agency for Fundamental Rights (FRA), in its 2025 publication of the Roma Survey 2024 findings, reported paid employment among 54% of Roma and Travellers surveyed, compared with 75% of the general population. The gender gap was particularly pronounced: 38% of Roma and Traveller women were in paid work, compared with 69% of men. Among young Roma and Travellers, 47% were neither in employment, education nor training. These figures concern the surveyed populations in 13 European countries and should not be presented as EU-wide employment statistics.[48]

The figures demonstrate that employment inequalities are not limited to access to qualifications or training. They also concern discriminatory recruitment, unequal access to mainstream employment services, limited availability of decent work, precarious employment, unpaid care responsibilities and the consequences of residential and educational segregation.

The European Commission's 2024 implementation reporting identified a range of employment initiatives within national Roma strategic frameworks. However, the adoption of targeted programmes does not in itself demonstrate that they reach Roma experiencing the greatest barriers or result in sustainable employment.[49]

46 European Commission, COM(2026) 602 final, sections I and II.V.

47 European Commission (2020), A Union of Equality: EU Roma strategic framework for equality, inclusion and participation for 2020–2030, COM(2020) 620 final; Council Recommendation of 12 March 2021 on Roma equality, inclusion and participation (2021/C 93/01).

48 European Union Agency for Fundamental Rights (2025), Rights of Roma and Travellers in 13 European countries: Perspectives from the Roma Survey 2024, employment findings. https://fra.europa.eu/en/publication/2025/roma-survey-2024

49 European Commission (2024), Report on the implementation of the national Roma strategic frameworks in light of the EU Roma strategic framework for equality, inclusion and participation and the Council Recommendation on Roma equality, inclusion and participation, COM(2024) 422 final, section 1.3 (education, employment, health and housing). https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52024DC0422

Some national initiatives illustrate approaches that merit examination. In Hungary, the Commission reported that the Growing Opportunities programme enabled more than 1,000 predominantly Roma women to gain qualifications by the end of 2021, with over 80% subsequently entering employment described as sustainable, including in social welfare. In Spain, the long-running Acceder programme combines individualised employment guidance, training and job placement, while Calí addresses barriers experienced by Roma women. Italy has also introduced an initiative drawing on the Acceder model.[50]

These examples demonstrate the potential of sustained, individualised support. However, programme-level achievements should not be interpreted as evidence that national labour-market inequalities have been resolved. Their wider relevance depends on coverage, accessibility, employment quality, retention and whether interventions address discrimination and structural barriers.

ERGO Network's 2024 comparative research on Roma access to decent and sustainable employment in Bulgaria, Czechia, Hungary, Romania, Slovakia and Spain documented persistent challenges concerning low pay, insecure contracts, discrimination and limited access to quality employment. Its findings reinforce the need to distinguish employment participation from effective access to decent work.[51]

Recent EU policy developments provide additional opportunities to strengthen Roma access to decent and sustainable employment. The European Commission's Quality Jobs Roadmap, presented in December 2025, places greater emphasis on fair pay, job security, working conditions, social protection and workers' rights. Its relevance for Roma equality lies in whether national employment policies and EU-funded interventions move beyond measuring labour-market participation towards assessing the quality and sustainability of employment. The proposed Quality Jobs Act, under preparation in 2026, provides a further opportunity to address precarious working conditions and strengthen enforcement.[52]

The Commission's 2025 Union of Skills initiative and the dedicated 2026 ESF+ call supporting Roma young people not in employment, education or training also create opportunities to improve access to vocational training and employment pathways. The latter allocated €5 million to transnational projects combining outreach, skills development and employment support for Roma young people. However, the effectiveness of these initiatives will depend on their accessibility, implementation and capacity to address discrimination and structural barriers, rather than training needs alone.[53]

The adoption of the 2024 EU Equality Bodies Directives, which Member States were required to transpose by June 2026, is particularly relevant to the enforcement of equal treatment in employment. Strengthened institutional independence, resources and powers should improve the capacity of equality bodies to address discriminatory recruitment and workplace practices. The 2023 Pay Transparency Directive, also subject to a June 2026 transposition deadline, introduces additional mechanisms for enforcing equal pay between women and men, with potential relevance for Roma women experiencing intersecting inequalities. These developments underline the importance of connecting Roma employment strategies with enforceable equality rights and effective remedies.[54]

50 European Commission (2024), Report on the implementation of the national Roma strategic frameworks, COM(2024) 422 final, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52024DC0422

51 ERGO Network (2024), Roma Access to Decent and Sustainable Employment in Bulgaria, Czech Republic, Hungary, Romania, Slovakia, and Spain (with additional benchmarking evidence from Ireland). https://ergonetwork.org/publication/roma-access-to-decent-and-sustainable-employment-in-bulgaria-czech-republic-hungary-romania-slovakia-and-spain-with-additional-benchmarking-evidence-from-ireland/

52 European Commission (2025), Quality Jobs Roadmap, COM(2025) 944 final, 4 December 2025. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52025DC0944

53 European Commission (2025), Union of Skills, COM(2025) 90 final; European Commission (2026), ESF+ transnational call supporting Roma young people not in employment, education or training.

54 Council Directive (EU) 2024/1499 of 7 May 2024; Directive (EU) 2024/1500 of the European Parliament and of the Council of 14 May 2024 (standards for equality bodies); Directive (EU) 2023/970 of 10 May 2023 (pay transparency and equal pay enforcement).

6.2. ERGO Network's 2026 civil society monitoring findings

ERGO Network's 2026 civil society survey examined targeted employment measures, changes in Roma access to the labour market since 2021, and the reach and effectiveness of vocational training and employment support.

EU Member States

Implementation of targeted employment measures. None of the 35 respondents assessed measures to improve Roma access to employment as fully implemented. Nineteen reported no implementation, while sixteen described implementation as limited. Respondents from some countries, including Italy, Ireland, Lithuania and Spain, provided differing assessments, illustrating that implementation experiences can vary within national contexts.

Changes in labour-market access since 2021. Twenty-one respondents reported no improvement in Roma access to the labour market. Four reported improvement, from Estonia, Ireland, Italy and Spain. Two did not know, while eight provided qualified or other responses. These findings indicate predominantly negative assessments, although the positive and qualified responses require attention rather than being treated as evidence of uniformly absent progress.

Vocational training and employment support. Nineteen respondents reported that vocational training, upskilling and employment support did not effectively reach Roma, particularly women and young people. The remaining sixteen considered that such support reached them only to a limited extent. No respondent provided an unequivocally positive assessment. This raises questions about programme accessibility, outreach, eligibility requirements and the effectiveness of support in facilitating transitions into employment.

Discrimination in recruitment and the workplace. Thirty-three respondents reported continuing discrimination against Roma in recruitment and employment. One respondent from Portugal reported no continuing discrimination, while one from Poland did not know. This is one of the clearest findings in the employment section: respondents overwhelmingly considered discrimination a persistent obstacle, irrespective of the availability of employment measures.

National monitoring evidence helps explain the difference between programme outputs and wider labour-market outcomes. In Romania, Roma Civil Monitor reporting documented that the national employment agency's 2023 programme reached 140 communities and recorded 1,202 Roma people entering employment, including 982 on open-ended contracts. A subsequent update reported 530 hires by 30 April 2024. These are relevant administrative results, but the same monitoring found no clear overall improvement in Roma labour-market access following the adoption of the national framework.[55]

Enlargement countries

Implementation of targeted employment measures. Eleven of the sixteen respondents assessed implementation as limited, while five reported no implementation. None considered measures fully implemented. Differences between respondents from the same country, including Kosovo*, suggest that the existence of national measures does not necessarily translate into consistent access across communities.[56]

Changes in labour-market access since 2021. Six respondents reported improvement, including responses from North Macedonia, Serbia and Kosovo*. Nine reported no improvement, including

55 Roma Civil Monitor (2025), Civil society monitoring report on the implementation of the national strategic framework for Roma equality, inclusion, and participation in Romania, employment section. https://www.romacivilmonitoring.eu/wp-content/uploads/2025/07/RCM2-2024-C1-Romania-FINAL-ISBN.pdf

56 ERGO Network (2026), civil society monitoring survey, employment questions 33–36 (enlargement countries, 16 respondents).

respondents from Albania, Bosnia and Herzegovina, Moldova, Montenegro, Serbia, Türkiye, Ukraine and Kosovo*. One respondent from Albania provided a qualified answer. These assessments are more mixed than those from EU Member States and should not be interpreted as national employment statistics.

Vocational training and employment support. Thirteen respondents reported that vocational training and employment support reached Roma only to a limited extent, while three considered that such measures did not reach Roma effectively. No respondent reported fully effective coverage.

Discrimination in recruitment and the workplace. Fourteen respondents reported continuing discrimination, one from Montenegro did not know and one from Albania provided a qualified response. As in the EU sample, perceptions of discrimination remained widespread even where some respondents reported improvements in access to employment.

Previous ERGO monitoring documented employment and entrepreneurship initiatives targeting Roma women in Serbia, including vocational training and mentoring. Such examples demonstrate programme activity, but without longitudinal evidence they cannot establish sustained employment outcomes or wider reductions in labour-market discrimination.[57]

6.3. Comparative assessment and key conclusions

The 2026 monitoring findings reveal a substantial implementation gap in Roma employment policies. Across both respondent groups, all 51 respondents assessed targeted employment measures as either absent or limited in practice. The same pattern emerged concerning the effective reach of vocational training and employment support.

This does not mean that no employment programmes exist or that all interventions are ineffective. Rather, it raises questions about their accessibility, scale, implementation and capacity to address the barriers experienced by Roma.

The first concern is the persistence of discrimination as a structural barrier to employment. Thirty-three of 35 EU respondents and fourteen of sixteen enlargement respondents reported continuing discrimination in recruitment and the workplace. These assessments reinforce the need to examine employer practices, discriminatory selection procedures, workplace treatment and access to effective remedies.

Employment strategies focused predominantly on improving Roma employability risk placing responsibility for labour-market exclusion on those experiencing discrimination. Training and qualifications are important, but they cannot substitute for employers' legal obligations to ensure equal treatment or for effective enforcement by public authorities.

The second concern is the difference between employment programme participation and access to decent, sustainable work. National monitoring frequently reports numbers of people trained, counselled or placed in employment. These outputs are relevant, but insufficient to determine whether interventions produce lasting improvements.

Assessments should examine the duration and security of employment, pay and working conditions, access to social protection, opportunities for progression and whether beneficiaries remain employed after programme support ends. Employment obtained through short-term subsidies or precarious arrangements should not automatically be treated as evidence of sustainable inclusion.

57 ERGO Network (2025), Civil Society Monitoring Report on the Implementation of National Roma Strategic Frameworks 2021–2025, employment chapter. https://ergonetwork.org/wp-content/uploads/2026/01/Civil-Society-Monitoring-Report-on-the-Implementation-of-National-Roma-Strategic-Frameworks-2021%E2%80%932025.pdf

Third, the findings raise serious concerns about the reach of employment measures among Roma women and young people. The pronounced gender employment gap documented by FRA illustrates the importance of examining how discrimination, unpaid care responsibilities, inadequate childcare provision, transport barriers and limited access to quality employment interact.

Measures addressing Roma women's employment should not assume that women lack motivation or require only additional training. They should address the institutional, economic and social barriers limiting access to employment, including the availability of affordable childcare, discriminatory recruitment and the unequal distribution of care responsibilities. Similarly, support for young Roma should extend beyond short-term training to effective transitions from education into decent employment.

Fourth, access to employment must be considered alongside educational inequality, housing exclusion and geographical isolation. Limited transport connections, segregated residential areas, unequal educational opportunities and digital barriers can restrict access to jobs and employment services. Public employment services should be assessed on their ability to address these barriers, rather than on the number of Roma registered in programmes.

Finally, the variation in responses concerning improvements since 2021 deserves further examination. Four EU respondents and six enlargement respondents reported some improvement, while others from the same or neighbouring countries described limited or no progress. Such differences underline the importance of examining local implementation and programme outcomes rather than producing simplistic national rankings.

The central accountability question is whether employment policies are reducing discrimination and improving Roma access to secure, adequately remunerated and sustainable work. The EU Roma Framework's mid-term review should assess these outcomes alongside national policy commitments and expenditure.

6.4. Recommendations

1. **Measure sustainable employment outcomes rather than programme activity alone.** Governments should monitor employment retention, contract security, earnings, working conditions and career progression, with appropriate safeguards for equality data. The European Commission should examine these outcomes when assessing implementation of national Roma strategic frameworks, taking account of the EU Quality Jobs Roadmap.

2. **Strengthen enforcement of equal treatment in recruitment and employment.** Member States should ensure timely and correct transposition and effective implementation of the 2024 Equality Bodies Directives, alongside enforcement of the Racial Equality Directive and other applicable equality legislation. Labour inspectorates, equality bodies and other competent authorities must have adequate resources and powers to address discriminatory recruitment and workplace practices, while Roma workers and jobseekers must have effective access to reporting mechanisms and remedies.

3. **Improve access to mainstream public employment services.** Employment authorities should identify and remove discriminatory and administrative barriers, provide accessible outreach and individualised support, and cooperate with Roma-led organisations in designing and assessing services.

4. **Address the specific barriers experienced by Roma women.** Employment measures should improve access to affordable childcare, transport, training and decent work while addressing gender discrimination, racial discrimination and unequal care responsibilities. Progress should be assessed through actual employment outcomes rather than participation figures alone.

5. **Strengthen transitions from education to sustainable employment for young Roma.** Governments should ensure access to quality vocational education, apprenticeships, career guidance and employment opportunities, with safeguards against segregation, exploitation and repeated placement in temporary or low-quality schemes.

6. **Link vocational training and employment support to decent work.** Publicly funded programmes should be assessed for their effectiveness in securing sustainable employment, fair pay, social protection and progression. Training should respond to genuine labour-market opportunities without reinforcing occupational segregation.

7. **Address territorial and structural barriers to employment.** Employment policies should be coordinated with measures on education, housing, transport, digital inclusion and social protection, particularly in segregated or geographically isolated communities.

8. **Strengthen accountability for national employment commitments.** Employment ministries, national Roma contact points and other responsible authorities should publish information on implementation, beneficiaries, expenditure and results, including how civil society evidence has informed corrective measures.

9. **Assess employment equality and programme effectiveness in EU and enlargement monitoring.** The European Commission should distinguish the existence of employment initiatives from demonstrated improvements in employment quality, reductions in discrimination and access to sustainable work, and identify appropriate follow-up within its competences.



7.
HEALTH AND EQUAL ACCESS TO HEALTHCARE

7.1. European policy commitments and progress since 2021

The EU Roma Strategic Framework 2020–2030 and the 2021 Council Recommendation establish commitments to improving Roma health and ensuring effective equal access to quality healthcare and social services. These include removing barriers to primary and preventive care, improving access to health insurance and health information, and addressing discrimination within healthcare systems.[58]

The European Commission's 2024 implementation report identified national measures in healthcare, but the adoption of health strategies, mediation programmes or outreach initiatives does not necessarily demonstrate effective access to services or improvements in health outcomes.[59]

The scale of health inequalities is reflected in the European Union Agency for Fundamental Rights' 2025 report on the Roma Survey 2024. Modelled life-expectancy estimates indicate that Roma and Traveller men live approximately 8.0 years less than men in the general population in the surveyed countries, and women 7.4 years less than women in the general population. These estimates underline the importance of measuring outcomes, rather than counting measures alone.[60]

Healthcare inequalities are linked to poverty, inadequate housing, environmental exposure, geographical isolation, administrative exclusion and discrimination. These factors can restrict access to care while also contributing to poorer health outcomes. National Roma health measures must therefore be assessed alongside the accessibility, affordability and quality of mainstream healthcare systems.

Recent EU policy developments offer additional opportunities to address these inequalities. The Commission's Safe Hearts Plan, adopted in December 2025, emphasises cardiovascular disease prevention, early detection, screening, treatment and tackling inequalities. Together with the EU4Health programme, it provides an opportunity to improve Roma inclusion in mainstream prevention and care. Yet Roma inclusion cannot be assumed merely because an initiative is designed for the general population.[61]

The European Health Data Space Regulation entered into force on 26 March 2025 and will be implemented progressively. It creates opportunities for secure exchange and secondary use of electronic health data, including for research and policymaking. However, it does not automatically provide ethnicity-disaggregated health data or remedy gaps in Roma health monitoring. Implementation must be accompanied by

58 European Commission (2020), A Union of Equality: EU Roma Strategic Framework for Equality, Inclusion and Participation, COM(2020) 620 final; Council Recommendation of 12 March 2021 on Roma equality, inclusion and participation (2021/C 93/01).

59 European Commission (2024), Report on the implementation of national Roma strategic frameworks, COM(2024) 422 final. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52024DC0422

60 FRA (2025), Rights of Roma and Travellers in 13 European countries: Perspectives from the Roma Survey 2024, Figure 22 and accompanying methodological notes. Estimates are based on the orphanhood method. https://fra.europa.eu/sites/default/files/fra_uploads/fra-2025-roma-survey-2024_en.pdf

61 European Commission (2025), Communication on an EU cardiovascular health plan: the Safe Hearts Plan, COM(2025) 1024 final, 16 December 2025. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52025DC1024; European Parliament and Council, Regulation (EU) 2021/522 establishing the EU4Health Programme.

safeguards against digital exclusion and discriminatory data practices.[62]

Country-level monitoring illustrates both institutional developments and continuing implementation gaps. In Bulgaria, Roma Civil Monitor documented more than 320 health mediators in 2024, expanded maternity-related services for uninsured women and hospital-based health mediators in seven municipalities. These initiatives can facilitate access but do not resolve wider barriers concerning insurance, affordability or discriminatory treatment.[63]

In Romania, civil society monitoring has identified difficulties related to registration, out-of-pocket costs, limited rural provision and preventive care. Earlier ERGO monitoring also documented mediation in North Macedonia and mobile outreach in Serbia. Their effectiveness depends on sustainable funding, geographical coverage and integration into mainstream healthcare.[64]

Discrimination in healthcare must be recognised as a barrier in its own right. FRA's 2025 report found that 16% of Roma and Travellers surveyed reported discrimination when accessing healthcare, compared with 8% in the earlier reference period. Differential treatment and hostile encounters cannot be explained solely by poverty or distance, and may deter people from seeking care or pursuing remedies.[65]

Roma women may face overlapping barriers related to racism, gender, income and administrative status. Their healthcare needs must not be reduced to maternity care. Equal access to sexual and reproductive healthcare, preventive services, informed consent, respectful treatment and effective remedies are essential components of healthcare equality.

The European Court of Human Rights' judgments concerning sterilisation of Roma women without valid informed consent in Slovakia provide important standards on reproductive autonomy, informed consent and institutional accountability. These judgments should not be taken as evidence of the current prevalence of such practices without contemporary research.[66]

The Commission's 2026 report calls for community outreach, culturally responsive healthcare and stronger coordination between healthcare, housing, sanitation, education and social services. This supports an integrated assessment of access barriers, while leaving open the question of whether national interventions have achieved sustained and equitable health outcomes.[67]

7.2. ERGO Network's 2026 civil society monitoring findings

ERGO Network's 2026 civil society survey examined implementation of healthcare measures, access to health mediation and outreach, changes in healthcare access since 2021, and the collection and use of Roma health outcome data.

62 Regulation (EU) 2025/327 on the European Health Data Space; European Commission, European Health Data Space Regulation: implementation timeline. https://health.ec.europa.eu/ehealth-digital-health-and-care/european-health-data-space-regulation-ehds_en

63 Roma Civil Monitor (2025), Bulgaria country fiche, health section. https://www.romacivilmonitoring.eu/wp-content/uploads/2025/10/C1-BG-Country-Fiche-2025.pdf

64 Roma Civil Monitor (2025), Romania national monitoring report, health section. https://www.romacivilmonitoring.eu/wp-content/uploads/2025/07/RCM2-2024-C1-Romania-FINAL-ISBN.pdf; ERGO Network (2025), Civil Society Monitoring Report on the Implementation of National Roma Strategic Frameworks 2021–2025, health section.

65 FRA (2025), Rights of Roma and Travellers in 13 European countries: Perspectives from the Roma Survey 2024, section 6.2, discrimination when accessing health services. https://fra.europa.eu/en/publication/2025/roma-survey-2024

66 European Court of Human Rights, V.C. v. Slovakia, application no. 18968/07, judgment of 8 November 2011; N.B. v. Slovakia, application no. 29518/10, judgment of 12 June 2012; I.G. and Others v. Slovakia, application no. 15966/04, judgment of 13 November 2012.

67 European Commission, COM(2026) 602 final, section II.VI.

EU Member States

Implementation of healthcare measures. Three of 35 respondents reported systematic implementation of mainstream or targeted measures to improve Roma access to healthcare. Seventeen described implementation as limited, fourteen reported none and one did not know. Overall, 31 of 35 (89%) assessed implementation as absent or limited.

Health mediation and outreach. Five respondents considered targeted services, including health mediators and mobile outreach, adequately accessible where needed. Twelve reported limited accessibility, sixteen reported no such services, one did not know and one considered the question inapplicable. The 28 negative or limited assessments indicate uneven availability of community-level support.

Changes in healthcare access since 2021. Only two respondents reported improvement, twenty-three reported none, six did not know and four provided qualified or other responses. These results suggest that most respondents have not observed meaningful improvements, without establishing deterioration.

Health outcome data and accountability. No respondent unequivocally confirmed systematic collection and use of Roma health outcome data for policymaking. Twenty-one reported none, four partial arrangements, two did not know and eight gave qualified responses. This raises serious concerns about capacity to assess outcomes and allocate resources.

Enlargement countries

Implementation of healthcare measures. One of sixteen respondents reported systematic implementation, eleven described implementation as limited and four reported none. Fifteen of sixteen assessed implementation as absent or limited.

Health mediation and outreach. One respondent considered mediation or outreach adequately accessible, seven reported limited accessibility, seven reported none and one did not know. Sustainability, geographical reach and connections to mainstream services require scrutiny.

Changes in healthcare access since 2021. Eight respondents reported improvement, seven reported no improvement and one did not know. This is more mixed than the EU pattern, but cannot establish better national health outcomes or the causes of perceived progress.

Health outcome data and accountability. No respondent unequivocally confirmed systematic collection and use of Roma health outcome data. Eight reported partial arrangements, five reported none and three did not know.

7.3. Comparative assessment and key conclusions

The monitoring findings identify a shared implementation deficit: 31 of 35 EU respondents and 15 of 16 enlargement respondents assessed healthcare measures as absent or limited. The existence of formal entitlements, health mediators or outreach programmes must be distinguished from effective access to appropriate care.

The FRA's modelled life-expectancy estimates reinforce the need to measure health outcomes and wider structural determinants, not only the number of services established. The persistent gap in life expectancy cannot be explained by the presence or absence of any single programme.

The difference in perceived progress between the two respondent groups deserves investigation: eight enlargement respondents reported improvements since 2021, compared with two EU respondents. Different starting conditions, local initiatives and respondent experiences may contribute; the survey cannot establish causation or support a regional ranking.

Health mediation can improve communication, navigation and preventive care, but cannot replace adequately staffed primary care, affordable treatment, non-discriminatory services or enforceable

entitlements. Administrative and financial barriers may persist even where formal rights exist.

Antigypsyism within healthcare institutions requires accountability through effective complaints procedures, independent oversight, professional standards and accessible remedies. Roma women's reproductive autonomy and wider healthcare needs must be addressed without reducing them to maternity services.

Recent EU initiatives, including the Safe Hearts Plan and EU4Health, provide opportunities to strengthen Roma inclusion in mainstream prevention, screening and treatment. Their actual accessibility should be assessed rather than presumed. The European Health Data Space creates opportunities for research but does not itself resolve gaps in Roma health equality data; privacy, participation and protection against digital exclusion remain essential.

Neither respondent group unequivocally confirmed systematic use of Roma health outcome data. Lawful, voluntary and privacy-protective equality data, developed with Roma participation, are needed to identify gaps and evaluate whether policies reduce inequalities. Healthcare must also be coordinated with housing, environmental protection and social policy.

7.4. Recommendations

1. **Guarantee effective access to primary and preventive healthcare.** Remove documentation, registration, insurance and affordability barriers, particularly for Roma in marginalised and remote communities, while strengthening mainstream public services.

2. **Ensure sustainable and accessible health mediation and outreach.** Provide stable funding, fair employment conditions and effective referral pathways; assess geographical coverage and continuity rather than activity counts alone.

3. **Address antigypsyism in healthcare institutions.** Establish accessible complaints procedures, independent oversight, professional training and effective remedies; evaluate whether discrimination complaints lead to corrective action.

4. **Protect Roma women's health rights and reproductive autonomy.** Ensure comprehensive sexual and reproductive healthcare, preventive services, informed consent, respectful treatment and effective remedies without reinforcing stereotypes.

5. **Improve health equality data and safeguards.** Develop lawful, voluntary, privacy-protective indicators with Roma civil society participation; assess European Health Data Space implementation for digital inclusion and safeguards against discriminatory use.

6. **Strengthen institutional and EU-level accountability.** Governments should establish measurable objectives, budgets and public reporting; the European Commission should assess whether EU4Health, the Safe Hearts Plan and other mainstream initiatives effectively reach Roma in the EU Roma Framework mid-term review.

7. **Address the social and environmental determinants of health.** Coordinate healthcare with housing, poverty reduction, water and sanitation, transport, environmental protection and social services, including in enlargement monitoring.

8.
HOUSING AND ACCESS TO ESSENTIAL SERVICES

8.1. European policy commitments and progress since 2021

The EU Roma Strategic Framework 2020–2030 and the 2021 Council Recommendation commit Member States to improving Roma access to adequate, affordable and desegregated housing and essential services, combating residential segregation and discrimination, and preventing forced evictions. These commitments require investment in housing and infrastructure alongside security of tenure, equal access to social housing, effective legal safeguards and meaningful Roma participation.[68]

In its 2024 implementation report, the European Commission identified measures addressing spatial segregation in 14 Member States, nine of which reported using EU funding. Progress nevertheless remained limited and slow. Only eight Member States reported estimates of spatial segregation, making it difficult to determine whether investments reduce segregation or simply improve conditions within existing segregated areas.[69]

Recent European policy developments

The European Commission's first European Affordable Housing Plan, presented in December 2025, seeks to increase housing supply, mobilise investment and improve affordability. The proposed Affordable Housing Act of September 2026 aims to clarify the scope for proportionate public measures addressing housing pressures. These initiatives create opportunities, but cannot substitute for targeted action against antigypsyism, residential segregation and exclusion from mainstream housing programmes.[70]

The October 2025 joint submission by the UN Human Rights Office and UN-Habitat to the Affordable Housing Plan consultation emphasised that adequate housing is a human right encompassing security of tenure, affordability, essential services, habitability, accessibility, location and cultural adequacy. These principles should inform EU housing investment, including under the next Multiannual Financial Framework.[71]

Structural housing exclusion across Europe

ERGO Network's comparative housing research and the 2026 Roma Inclusion, Participation and Equality (RIPE) Index, developed in cooperation with the Council of Europe, document persistent structural barriers. The RIPE assessment of 20 Council of Europe member states identifies residential segregation,

68 European Commission, EU Roma Strategic Framework for Equality, Inclusion and Participation 2020–2030, COM(2020) 620 final; Council Recommendation of 12 March 2021 on Roma equality, inclusion and participation, 2021/C 93/01.

69 European Commission, Report on the implementation of the national Roma strategic frameworks, COM(2024) 422 final, housing section.

70 European Commission, European Affordable Housing Plan (December 2025); European Commission, proposal for an Affordable Housing Act, COM(2026) 599 final (September 2026). Legislative proposal, not adopted law.

71 OHCHR and UN-Habitat, Housing, a Matter of Human Rights: Joint Submission on the European Affordable Housing Plan (October 2025), https://europe.ohchr.org/sites/default/files/2025-11/2025-10%20UN%20Human%20Rights%20UN-Habitat%20Joint%20Submission%20on%20the%20European%20Affordable%20Housing%20Plan.pdf.

informal settlements, insecure tenure, discriminatory housing allocation, inadequate essential services and insufficient safeguards against forced evictions. Severe challenges are documented in Bulgaria, Italy, Romania, Serbia, Slovakia and Ukraine; discrimination in private rental markets and inadequate Traveller accommodation illustrate additional forms of exclusion.[72]

The findings point to recurring institutional weaknesses: insufficient social and affordable housing, restrictive allocation criteria, limited legalisation of informal settlements, weak enforcement of desegregation obligations and inadequate Roma participation. Local relocation initiatives in Romania, transitions away from segregated camps in parts of Italy and integrated housing approaches in Spain show that positive measures may coexist with continued exclusion.[73]

Human rights standards and enforcement

European jurisprudence has repeatedly established safeguards against disproportionate evictions. In Yordanova and Others v. Bulgaria and Winterstein and Others v. France, the European Court of Human Rights emphasised individual circumstances and proportionality. In Aleksieva and Others v. Bulgaria (August 2026), the Court found an Article 8 violation following the demolition of Roma homes without effective advance review of proportionality.[74]

The European Committee of Social Rights has likewise addressed inadequate housing, discrimination and eviction safeguards. Its decision concerning prolonged electricity outages in Cañada Real, Spain, illustrates the connections between housing, energy access, education and other social rights. The continuing relevance of these decisions highlights shortcomings in implementation and enforcement, rather than an absence of European standards.[75]

Traveller accommodation

In France, the Défenseur des droits has documented shortages and poor conditions of designated Traveller stopping areas, inadequate sanitation and environmental risks, alongside concerns about sanctions against families lacking lawful alternatives. In Ireland, the Irish Human Rights and Equality Commission and the Council of Europe Commissioner for Human Rights have identified insufficient culturally appropriate accommodation, inadequate halting-site conditions and weaknesses in local implementation. Housing equality requires adequate, serviced stopping places and recognition of different accommodation needs, including caravans and mobile homes.[76]

The Commission's 2026 report cites France's Resorption-Bidonvilles platform and Czechia's Housing Support Act, including Housing First approaches and safeguards against investment in segregated housing, as examples of housing interventions. It nevertheless warns that residential segregation persists and that upgrading segregated settlements does not necessarily result in desegregation. It reports housing deprivation affecting 47% of Roma covered by the FRA Roma Survey 2024.[77]

72 ERGO Network, Roma Access to Quality and Affordable Housing (2023); ERGO Network and Council of Europe, RIPE Comparative Report (2026), section 7, pp. 23–27.

73 European Commission, COM(2024) 422 final; ERGO Network, Roma Access to Quality and Affordable Housing (2023); relevant country monitoring reports on Romania, Italy and Spain.

74 ECtHR, Yordanova and Others v. Bulgaria, no. 25446/06, 24 April 2012; Winterstein and Others v. France, no. 27013/07, 17 October 2013; Aleksieva and Others v. Bulgaria, no. 30915/23, 25 August 2026.

75 European Committee of Social Rights, Defence for Children International (DCI) and Others v. Spain, Complaint No. 206/2022, decision on the merits of 11 September 2024, made public 26 February 2025.

76 Défenseur des droits, Avis 25-05 (21 March 2025) and Décision 2024-114; Irish Human Rights and Equality Commission, equality reviews and recommendations concerning Traveller accommodation; Council of Europe Commissioner for Human Rights, memorandum following visit to Ireland (2025).

77 European Commission, COM(2026) 602 final, section II.VII.

8.2. ERGO Network's 2026 civil society monitoring findings

ERGO Network's 2026 civil society survey examined measures to improve access to adequate and desegregated housing, safeguards against forced evictions, access to essential services and coordination between responsible authorities.

EU Member States

Housing measures and desegregation. Twenty of 35 respondents (57%) reported no implementation of measures to improve access to adequate, affordable and desegregated housing, while 11 (31%) described implementation as limited. Four gave qualified responses; none confirmed systematic implementation.

Forced evictions and safeguards. Twenty-one respondents (60%) reported no effective implementation of eviction-prevention measures and safeguards; six (17%) described implementation as partial, one did not know, four considered the question inapplicable and three gave qualified responses. None provided an unequivocal positive assessment.

Essential services. Seventeen respondents (49%) reported no significant improvement since 2021 in access to water, sanitation, electricity and internet connectivity, and three (9%) reported deterioration. Nine reported some improvement, two significant improvement and four gave non-substantive responses.

Coordination. Twenty-four respondents (69%) considered coordination between national, regional and local authorities ineffective; 11 (31%) described it as partially effective. None confirmed effective coordination.

Enlargement countries

Housing measures and desegregation. All 16 respondents reported either limited implementation (12) or no implementation (four); none confirmed systematic implementation.

Forced evictions and safeguards. Seven respondents described safeguards as partially implemented, four reported none, two did not know, two considered the question inapplicable and one gave a qualified response. None confirmed fully effective measures.

Essential services. Nine respondents reported some improvement since 2021 and one significant improvement; four reported no significant change and two deterioration. Perceived improvement does not establish adequate access.

Coordination. Ten respondents assessed coordination as partially effective, five considered it ineffective and one did not know. None confirmed fully effective coordination.

8.3. Comparative assessment and key conclusions

The survey reveals a substantial implementation gap across both groups. No respondent unequivocally confirmed systematic implementation of housing measures or fully effective eviction safeguards. This contrasts with programmes and investments reported by governments and European institutions, highlighting the difference between policy activity and measurable improvements in housing rights.

Three patterns recur across the survey, RIPE and European human rights monitoring. First, residential segregation remains embedded through insufficient social housing, discriminatory allocation, insecure tenure and inadequate infrastructure; investment within segregated settlements does not necessarily constitute desegregation. Second, forced evictions persist despite established safeguards requiring proportionality, due process and effective remedies. Third, fragmented responsibilities across housing, planning, infrastructure and social services undermine implementation, while neither survey group reported fully effective coordination.

Access to essential services presents a more mixed picture: enlargement respondents more frequently reported improvements, whereas EU respondents more often described stagnation or deterioration. These are perceptions from different respondent groups, not directly comparable population-level estimates. The situation of Traveller communities in France and Ireland further illustrates the need to recognise culturally appropriate accommodation and prevent the absence of lawful stopping places from being compounded by punitive measures.

The emerging EU housing agenda offers opportunities, but greater supply and investment will not automatically deliver Roma inclusion. Explicit desegregation objectives, non-discrimination safeguards, measurable outcomes, independent monitoring and meaningful Roma participation are needed. Housing deprivation also affects health, education, employment and children's well-being, making adequate housing central to the wider EU Roma Strategic Framework.

8.4. Recommendations

1. **Adopt funded, time-bound desegregation plans.** National and local authorities should set measurable targets for adequate, affordable and non-segregated housing and prevent public investments from perpetuating segregation.
2. **Prevent forced evictions and guarantee effective remedies.** Strengthen security of tenure, individualised proportionality assessments, legal assistance, judicial review and appropriate safeguards and accommodation consistent with human rights standards.
3. **Ensure equal access to social and affordable housing.** Review discriminatory eligibility and allocation criteria, address private rental discrimination and improve access for Roma households facing severe deprivation.
4. **Guarantee essential services and adequate living conditions.** Ensure safe water, sanitation, electricity, affordable energy, waste management and digital connectivity, while addressing environmental risks.
5. **Ensure culturally appropriate Traveller accommodation.** Provide safe, serviced stopping places, recognise mobile homes and involve Traveller communities in accommodation planning.
6. **Make EU housing investment accountable for Roma equality.** Integrate desegregation and non-discrimination safeguards into EU housing initiatives, cohesion policy, EU funding for enlargement countries and the next MFF, monitoring actual outcomes.
7. **Strengthen institutional accountability and Roma participation.** Define responsibilities, provide sustainable financing and independent monitoring, and ensure meaningful participation of Roma-led organisations.

9.
DIGITAL INCLUSION AND ENVIRONMENTAL JUSTICE

9.1. European policy commitments and progress since 2021

The Commission's 2026 assessment identifies digital exclusion and missing identity or property documentation as barriers that can prevent Roma households from accessing mainstream support. These obstacles illustrate why digitalisation must be accompanied by accessible offline services and non-discriminatory administrative procedures.[78]

The EU Roma Strategic Framework 2020–2030 explicitly identifies digital inclusion and environmental justice as cross-cutting priorities. It calls for measures to address Roma digital exclusion, including access to connectivity, digital skills and e-government, and recognises environmental discrimination affecting Roma as a manifestation of antigypsyism. The 2021 Council Recommendation reinforces commitments on essential services, infrastructure, non-discrimination and equal opportunities.[79]

Since 2021, EU digital policy has evolved substantially. The Digital Decade Policy Programme 2030 establishes targets for connectivity, digital skills and digital public services. The Digital Services Act addresses illegal online content and platform accountability, with implications for online antigypsyism. The Artificial Intelligence Act establishes a risk-based regulatory framework, including safeguards relevant to discriminatory automated decision-making in education, employment and access to certain essential public and private services. Its obligations apply according to a phased timetable; these instruments should not be presented as if all requirements were already fully applicable.[80]

However, digital transformation does not automatically create equal access. Digital-only applications for benefits, health care, education and administrative services can deepen exclusion when households lack affordable internet, suitable devices, electricity, digital literacy or accessible assistance. Accessible offline and assisted channels remain essential. Likewise, the regulation of online hate and algorithmic systems is distinct from the practical task of overcoming digital poverty.

Environmental justice is similarly embedded in the EU Roma agenda but remains insufficiently translated into measurable action. ERGO Network and the European Environmental Bureau (EEB) examined how environmental justice is reflected in national Roma strategic frameworks, building on research documenting exposure to pollution, inadequate water and sanitation, waste-related hazards and discriminatory decisions about infrastructure. Their analysis provides a basis for assessing whether strategies recognise environmental racism as a structural problem rather than treating it solely as an aspect of poverty or poor housing.[81]

78 European Commission, COM(2026) 602 final, section II.II.

79 European Commission, A Union of Equality: EU Roma Strategic Framework for Equality, Inclusion and Participation, COM(2020) 620 final, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0620; Council Recommendation of 12 March 2021 on Roma equality, inclusion and participation, 2021/C 93/01, https://eur-lex.europa.eu/eli/reco/2021/319/oj.

80 Decision (EU) 2022/2481 establishing the Digital Decade Policy Programme 2030, https://eur-lex.europa.eu/eli/dec/2022/2481/oj; Regulation (EU) 2022/2065 (Digital Services Act), https://eur-lex.europa.eu/eli/reg/2022/2065/oj; Regulation (EU) 2024/1689 (Artificial Intelligence Act), https://eur-lex.europa.eu/eli/reg/2024/1689/oj.

81 ERGO Network and European Environmental Bureau, Environmental Justice in National Roma Strategic Frameworks (2024),

Energy poverty adds another dimension: households in inadequate or segregated housing may be unable to access affordable energy, renovation subsidies or the benefits of energy-efficiency investment. Green-transition programmes should therefore be assessed by who can access them, who bears environmental risks and who participates in decisions. The Commission's 2024 implementation report also points to uneven national progress, reinforcing the need to connect these concerns to enforceable responsibilities, financing and monitoring.[82]

9.2. ERGO Network's 2026 civil society monitoring findings

ERGO Network's 2026 civil society survey examined measures to reduce digital exclusion, address environmental risks and inequalities, and support Roma participation in the green transition.

EU Member States

Digital inclusion. Of 35 respondents, 21 reported no measures to improve Roma access to internet and devices, digital skills or digital public services; 12 reported measures implemented only to a limited extent and two did not know. None reported systematic implementation. Thus 33 of 35 respondents described action as absent or limited. This is particularly consequential as digital barriers affect access to education, employment, health care and social protection.

Environmental justice and the green transition. Twenty-four respondents reported no measures addressing environmental risks or inequalities affecting Roma or supporting their participation in relevant green initiatives. Four reported limited measures, two did not know and five marked the question not applicable; none reported systematic implementation. "Not applicable" should not be interpreted as proof that environmental risks are absent.

ERGO's earlier assessment of Czechia identified digital poverty alongside exclusion in socially disadvantaged localities. Research on energy poverty in Czechia, Hungary, Ireland and Slovakia shows why nominally universal energy and renovation programmes may fail to reach Roma households. In Slovakia, civil society organisations have challenged the location of Roma housing near a landfill in Martin; the allegations should not be presented as an established judicial finding. These examples illustrate distinct dimensions of digital and environmental exclusion, but cannot be used to rank countries on the basis of the 2026 survey.[83]

Enlargement countries

Digital inclusion. Ten of 16 respondents reported no measures and six reported limited implementation. None reported systematic measures. All 16 therefore assessed implementation as absent or limited.

Environmental justice and green-transition participation. Twelve respondents reported no measures, three reported limited measures and one did not know; none reported systematic action. These findings warrant scrutiny of whether mainstream infrastructure and climate programmes reach segregated or informal settlements and whether residents have a meaningful role in planning.

https://eeb.org/en/library/environmental-justice-in-national-strategic-frameworks/; European Environmental Bureau, Pushed to the Wastelands: Environmental Racism against Roma Communities in Central and Eastern Europe (2020), https://eeb.org/it/library/pushed-to-the-wastelands-environmental-racism-against-roma-communities-in-central-and-eastern-europe/.

82 Roma Civil Monitor, thematic research on Roma equality and inclusion in Europe's green transition and energy poverty (2024), publication details to be confirmed against final edition; European Commission, Report on the implementation of national Roma strategic frameworks, COM(2024) 422 final, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52024DC0422.

83 ERGO Network (2025), *Civil Society Monitoring Report on the Implementation of National Roma Strategic Frameworks 2021–2025*, https://ergonetwork.org/publication/civil-society-monitoring-report-on-the-implementation-of-national-roma-strategic-frameworks-2021-2025/; Eva Schwab (2024), *Roma Equality and Inclusion in Europe's Green Transition: Energy Poverty in Czechia, Hungary, Ireland and Slovakia*, Roma Civil Monitor, https://romacivilmonitoring.eu/wp-content/uploads/2024/09/RCM_2024_Thematic-report-green-FINAL-ISBN.pdf; European Roma Rights Centre (2023), "Slovak Municipality Sued for Discrimination for Relocating Roma to a Landfill", 23 August, https://www.errc.org/press-releases/slovak-municipality-sued-for-discrimination-for-relocating-roma-to-a-landfill.

Kosovo*offers a historical illustration of the consequences of environmental injustice: Roma,Ashkali and Balkan Egyptian displaced people were accommodated in lead-contaminated camps in the Mitrovica area. This documented legacy underscores the importance of environmental-risk assessment, accountability and remedies, but is not evidence of present-day implementation of green-transition measures.[84]

9.3. Comparative assessment and key conclusions

Across both samples, no respondent reported systematic implementation of digital inclusion or environmental justice measures. In the EU sample, 21 of 35 respondents reported no digital measures and 24 no environmental measures; the corresponding figures in enlargement countries were ten of 16 and twelve of 16. These are respondent-level findings and must not be translated into counts of countries without programmes.

The two policy areas are connected but require distinct interventions. Digital exclusion concerns connectivity, devices, skills, service design and safeguards against discriminatory technologies. Environmental injustice concerns unequal exposure to hazards, inadequate infrastructure, energy insecurity and exclusion from environmental decision-making. Both can be intensified by antigypsyism and residential segregation, yet generic mainstream programmes do not establish that Roma communities have benefited.

The ERGO–EEB analysis provides a particularly important accountability test: whether environmental justice is named in national Roma strategies, reflected in funded actions and assessed through measurable outcomes. The same test should apply to digital transformation. A programme's existence, expenditure or formal accessibility is not sufficient evidence of equal access. Authorities need locally verifiable data, rights-respecting monitoring, Roma participation and corrective action where unequal outcomes persist.

The mid-term review of national Roma frameworks offers an opportunity to connect digital and environmental objectives to national strategies without duplicating the housing, education or employment chapters. It should focus on the added value of cross-sector coordination: preventing exclusion from digital-only services and ensuring that green and digital investments reach communities historically left behind.

9.4. Recommendations

1. **Establish explicit digital and environmental equality objectives.** National governments should include responsible institutions, budgets, timelines and measurable indicators in Roma framework implementation plans, with Roma participation from the design stage.

2. **Preserve accessible public services.** Authorities should address affordability of connectivity and devices, provide practical digital-skills support and maintain effective assisted and offline routes to essential services.

3. **Address environmental racism and energy poverty.** Governments and municipalities should assess pollution, climate exposure, water and sanitation deficits, energy affordability and barriers to renovation support, and provide enforceable remedies.

84 European Roma Rights Centre (2006), "European Roma Rights Centre Presses for Criminal Charges Related to Extreme Harms in Northern Kosovo", 1 February 2006, https://www.errc.org/roma-rights-journal/european-roma-rights-centre-presses-for-criminal-charges-related-to-extreme-harms-in-northern-kosovo.

4. **Apply equality safeguards to green and digital investment.** EU and national managing authorities should assess who benefits, prevent discriminatory or segregating outcomes and publish distributional results.

5. **Ensure meaningful Roma participation.** Roma-led organisations and residents, including Roma women and young people, should participate in environmental planning, digital service design, risk assessment and monitoring.

6. **Monitor outcomes and require corrective action.** The Commission and national authorities should track actual service usability, affordability, environmental exposure and participation, and revise programmes when evidence reveals persistent gaps.

10.
ROMA CULTURE, HISTORY, IDENTITY AND RECOGNITION

10.1. European policy commitments and progress since 2021

The EU Roma Strategic Framework 2020–2030 and the 2021 Council Recommendation recognise the importance of promoting Roma history, culture and language, challenging stereotypes and supporting remembrance of the Roma Holocaust. These are integral to combating antigypsyism and advancing equality, inclusion and participation. Recognition of Roma identity is therefore not merely a cultural objective: it is also a matter of fundamental rights, historical justice and institutional responsibility.[85]

Romani language and cultural rights. The European Charter for Regional or Minority Languages provides an important framework for protecting Romani. According to Council of Europe information, 16 states recognise or protect Romani under the Charter, although the scope of their undertakings varies. Formal recognition does not necessarily provide accessible language education, qualified teachers, materials or opportunities to use Romani in public life. Language preservation and revitalisation are inseparable from cultural identity, intergenerational transmission and the right of Roma communities to define their own narratives.[86]

Teaching Roma history in schools. Council of Europe Recommendation CM/Rec(2020)2 calls for Roma and Traveller history to be included in school curricula and teaching materials. Education should address enslavement, persecution, the Roma Holocaust and resistance, while also recognising Roma intellectual, cultural, political and social contributions to European history. Council of Europe educational and thematic work, including ADI-ROM exchanges on Roma history in school curricula, points to the need to move from optional or fragmented references to systematic teaching, teacher preparation and meaningful involvement of Roma historians and educators. Teaching about persecution must not reduce Roma identity exclusively to victimhood.[87]

Holocaust remembrance and historical recognition. Recognition of 2 August as European Roma Holocaust Memorial Day, remembrance activities and institutional cooperation have made the genocide more visible. The EU–Council of Europe Roma Memory programme and its planned 2026–2028 continuation offer opportunities to strengthen education, memorialisation and cooperation. Yet ceremonies alone do not establish comprehensive historical education, sustained support for memorial sites or acknowledgement

85 European Commission, A Union of Equality: EU Roma Strategic Framework for Equality, Inclusion and Participation, COM(2020) 620 final, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0620; Council Recommendation of 12 March 2021 on Roma equality, inclusion and participation, 2021/C 93/01, https://eur-lex.europa.eu/eli/reco/2021/319/oj.

86 Council of Europe, "Romani Language", https://www.coe.int/en/web/roma-and-travellers/romani-language; Advisory Committee on the Framework Convention for the Protection of National Minorities (2024), *Thematic Commentary No. 1 on Education under the Framework Convention for the Protection of National Minorities* (revised edition), https://edoc.coe.int/en/minority-rights/11974-thematic-commentary-no-1-on-education-under-the-framework-convention-for-the-protection-of-national-minorities.html.

87 Council of Europe, Committee of Ministers (2020), Recommendation CM/Rec(2020)2 on the inclusion of the history of Roma and/or Travellers in school curricula and teaching materials, https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=09000016809e2c26; Council of Europe, Committee of Experts on Roma and Traveller Issues (ADI-ROM) (2025), *Thematic report on inclusion of Roma history in school curricula*, following the thematic visit to Bratislava, Slovakia, 7–8 October 2025, https://www.coe.int/en/web/roma-and-travellers/thematic-report.

of state and institutional responsibility.[88]

Roma civil society has been central to progress. The youth-led Dikh He Na Bister initiative has helped preserve the memory of the Roma Holocaust, mobilise young Roma and sustain intergenerational remembrance around 2 August. Roma-led campaigns have helped bring historical recognition onto European and national agendas. Nevertheless, the responsibility to implement curricula, remembrance and recognition commitments rests with public institutions and must not be shifted to civil society.[89]

From historical recognition to transitional and reparatory justice. Historical and institutional antigypsyism is a Europe-wide concern, though its manifestations and contexts differ. Roma communities have experienced enslavement, forced assimilation, segregation, forced sterilisation, the Roma Holocaust and other forms of state-sponsored violence and exclusion. The historical record and institutional responsibility remain insufficiently investigated and acknowledged in many contexts. Recognition must extend beyond commemoration to meaningful investigation, redress and guarantees of non-repetition.

Roma civil society has helped develop the evidence and approaches needed for this work. CHACHIPEN (2021–2023) produced comparative research and recommendations concerning truth and reconciliation in Germany, Romania, Sweden and Spain. JEKHIPE (2024–2026) built on this work through national research, policy recommendations and transitional justice tools, including approaches to expert and truth commissions and institutional dialogue. The precise status of individual JEKHIPE outputs should be checked against the final project deliverables rather than treating every proposed mechanism as implemented.[90]

National precedents illustrate different institutional approaches. Germany's Independent Commission on Antigypsyism published its report in 2021, documenting historical and contemporary discrimination and proposing measures to address institutional antigypsyism. Spain's Law 20/2022 on Democratic Memory provided for a Working Commission on Memory and Reconciliation with the Roma People, whose establishment was approved in 2024. These examples should be assessed by mandate, independence, Roma participation, follow-up and practical outcomes—not simply by their establishment.[91]

The Council of Europe's ADI-ROM thematic report on combating antigypsyism, following a visit to Germany in September 2024 and transmitted to the Committee of Ministers in 2025, identifies expert commissions documenting antigypsyism and permanent institutional structures as relevant approaches. It also highlights memorialisation. ADI-ROM work on Roma history in education connects historical recognition to prevention of contemporary discrimination. These are important building blocks, but not a comprehensive European transitional justice framework.[92]

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88 European Parliament (2015), Resolution of 15 April 2015 on the occasion of International Roma Day – anti-Gypsyism in Europe and EU recognition of the memorial day of the Roma genocide during World War II (2015/2615(RSP)), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52015IP0095; Council of Europe and European Union (2026), *RomaMemory – Roma Holocaust Remembrance and Education*, Phase II (1 August 2026–22 July 2028), https://www.coe.int/en/web/roma-genocide/romamemory.

89 ternYpe International Roma Youth Network, "DIKH HE NA BISTER – Roma Genocide Remembrance Initiative", https://www.ternype.eu/about-ternype.

90 Carballo-Mesa, A., Carrera, S., Casermeiro Cortés, P., Rostas, I., Selling, J. and Stan, L. (2023), *Paving the Way for Truth and Reconciliation Process to Address Antigypsyism in Europe: Remembrance, Recognition, Justice and Trust-Building*, CHACHIPEN/CEPS, https://cdn.ceps.eu/wp-content/uploads/2023/06/Truth-and-Reconciliation-Process-to-Address-Antigypsyism-in-Europe.pdf; ERGO Network (2024–2026), *JEKHIPE – Reclaiming our past, rebuilding our future: New approaches to fighting antigypsyism through transitional justice*, https://ergonetwork.org/project/jekhipe/.

91 Unabhängige Kommission Antiziganismus (2021), *Perspektivwechsel – Nachholende Gerechtigkeit – Partizipation: Bericht der Unabhängigen Kommission Antiziganismus*, Bundestagsdrucksache 19/30310, https://www.institut-fuer-menschenrechte.de/fileadmin/Redaktion/PDF/UKA/Bericht_UKA_Perspektivwechsel_Nachholende_Gerechtigkeit_Partizipation.pdf; Spain, *Ley 20/2022, de 19 de octubre, de Memoria Democrática*, https://www.boe.es/buscar/act.php?id=BOE-A-2022-17099; Gobierno de España, Consejo de Ministros (23 April 2024), "Comisiones previstas en la Ley de Memoria Democrática", including the Comisión de trabajo sobre la Memoria y la Reconciliación con el Pueblo Gitano en España, https://www.lamoncloa.gob.es/consejodeministros/referencias/Paginas/2024/20240423-referencia-del-consejo-de-ministros.aspx.

92 Council of Europe, Committee of Experts on Roma and Traveller Issues (ADI-ROM) (2025), *Thematic Report on Combating Antigypsyism*, following the thematic visit to Berlin, Germany, 9–10 September 2024, CM(2025)119-add3, 27 August 2025, https://search.coe.int/cm?i=0912594880281bce.

At European level, the European Parliament's 2017 resolution called for truth and reconciliation commissions at EU and national levels. However, a comprehensive European approach to transitional justice for Roma has not emerged, and national processes remain fragmented. A coordinated European commitment would need to complement, rather than replace, nationally grounded mechanisms reflecting distinct histories.[93]

International experience offers lessons. The African Union Transitional Justice Policy (2019) provides a continental framework connecting truth, accountability, reparations, institutional reform, historical injustices and socio-economic and ethno-cultural justice. Experiences in South Africa and Sierra Leone demonstrate the importance of independent truth-seeking, but also the limits of processes without adequately funded follow-up and implemented reparatory measures. These contexts are distinct from Roma histories in Europe; the relevance lies in institutional design and implementation, not in equating experiences.[94]

A European approach to transitional and reparatory justice for Roma should combine coordinated commitments with independent, adequately resourced national processes developed through meaningful Roma participation. It should examine historical violations and institutional responsibility, provide access to archives, enable public acknowledgement, assess appropriate individual and collective reparations, and promote institutional reform and guarantees of non-repetition. Present-day social inclusion measures must not be presented as substitutes for justice and reparation.

The Commission's 2026 report notes remembrance initiatives including the Montreuil-Bellay Memorial Project in France and the 2025 Dutch parliamentary motion recognising Roma, Sinti and Travellers as a national minority under the Council of Europe minority-protection framework. Recognition is relevant to historical justice and visibility, but its contribution to equality must also be assessed through policy follow-up and institutional practice.[95]

10.2. ERGO Network's 2026 civil society monitoring findings

ERGO Network's 2026 civil society survey examined support for Roma history, culture, language and identity, their inclusion in education and public awareness, and recognition and remembrance of the Roma Holocaust and other historical injustices.

EU Member States

Roma culture, language and identity. Four of 35 respondents reported systematic measures; 23 described limited implementation and eight reported none. This suggests that initiatives may exist without consistent funding, geographical coverage, institutional continuity or meaningful influence by Roma cultural actors.

Roma history in education. Two respondents assessed inclusion of Roma history, culture and the Roma Holocaust in curricula and public education as systematic; 18 considered it limited and 15 reported no implementation. A formal curriculum reference does not establish consistent, historically accurate teaching in classrooms.

Holocaust remembrance and historical recognition. Six respondents reported systematic official support, 20 limited support and nine no implementation. Remembrance may be more visible than sustained teaching, but both areas show substantial gaps. Public ceremonies should be assessed alongside educational resources, institutional acknowledgement and Roma participation in memorial policy.

93 European Parliament (2017), *Resolution of 25 October 2017 on fundamental rights aspects in Roma integration in the EU: fighting anti-Gypsyism* (2017/2038(INI)), P8_TA(2017)0413, OJ C 346, 27 September 2018, pp. 171–183, https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:52017IP0413.

94 African Union, Transitional Justice Policy (2019), https://au.int/en/documents/20190425/african-union-transitional-justice-policy; South African Truth and Reconciliation Commission, Final Report (1998–2003); Sierra Leone Truth and Reconciliation Commission, Witness to Truth (2004).

95 European Commission, COM(2026) 602 final, section II.I.

Czechia – Lety u Písku. The opening of the memorial in 2024, following removal of the pig farm occupying the former camp site, demonstrates the importance of sustained Roma advocacy and state acknowledgement. The Museum of Romani Culture administers the memorial. Its existence does not, however, establish systematic uptake of Roma history teaching in schools.

Enlargement countries

Cultural and language measures. None of the 16 respondents reported systematic measures; 13 assessed implementation as limited and three reported none.

Education and remembrance. Six respondents described inclusion of Roma history, culture and the Roma Holocaust in curricula and public education as limited, while ten reported no implementation. On official Holocaust remembrance and historical recognition, seven reported limited implementation and nine none. No respondent reported systematic implementation in either area.

Bosnia and Herzegovina and Kosovo*– Romani language. Tuzla Canton introduced Romani into the school curriculum with support from education authorities, whilePrizren's municipal council approved Romani for official use at municipal level in 2022. These are institutional advances, but neither demonstrates country-wide access to Romani-language education or public services.[96]

The survey cannot establish which curricula contain compulsory content, the actual availability of Romani-language instruction, or the adequacy of cultural budgets in each country. It nevertheless indicates that cultural rights and historical recognition remain marginal to implementation in many respondents' assessments.

10.3. Comparative assessment and key conclusions

Systematic implementation remains uncommon in both samples. In the EU, four of 35 respondents identified systematic cultural measures, but only two systematic inclusion of Roma history and the Holocaust in education. In enlargement countries, none reported systematic implementation in either area. These are respondent-level comparisons and must not be converted into country rankings.

First, formal recognition does not ensure effective cultural and language rights. Monitoring must examine whether Romani can actually be taught and used, whether cultural institutions are adequately supported, and whether Roma communities shape decisions about their heritage and identity.

Second, remembrance is not equivalent to sustained historical education. Memorials and commemorations matter, especially where persecution was denied or neglected, but they cannot replace accurate curricula, trained teachers, archives and historical literacy. Roma history must encompass persecution and resistance alongside cultural, intellectual and political contributions; neither exclusively victim-centred nor purely celebratory narratives are sufficient.

Third, historical recognition must be connected to institutional accountability. CHACHIPEN, JEKHIPE and ADI-ROM work offer research and policy approaches, while Germany and Spain provide distinct institutional examples. Yet documentation, consultation and commemoration do not substitute for public authorities investigating violations, acknowledging responsibility and considering reparatory measures. The 2026 survey does not directly measure the existence or effectiveness of transitional justice mechanisms, which require separate research.

The mid-term review of national Roma frameworks should therefore test commitments against actual curriculum delivery, language access, sustained cultural support, remembrance policy and—through complementary monitoring—historical accountability and reparatory outcomes.

96 Council of Europe, Steering Committee on Anti-discrimination, Diversity and Inclusion (CDADI) (2025), *Final Evaluation Report on the Implementation of the Strategic Action Plan for Roma and Traveller Inclusion (2020–2025)*, CM(2025)180-add2, 15 December 2025, https://search.coe.int/cm?i=091259488029d0a7.

10.4. Recommendations

1. **Integrate Roma history into compulsory education.** Education ministries should ensure historically accurate teaching of Roma and Traveller history, including enslavement, the Roma Holocaust, persecution, resistance and contributions to European societies, with curricula and teacher training developed with Roma historians, educators and organisations.

2. **Guarantee effective Romani-language rights and cultural support.** Governments should translate recognition into accessible language education, qualified teachers, materials and predictable funding for Roma-led cultural institutions, archives, museums and heritage initiatives.

3. **Strengthen Holocaust remembrance and institutional responsibility.** Authorities should sustain memorial sites, archives, commemorations and public education, with meaningful Roma participation and acknowledgement of institutional roles in persecution.

4. **Establish coordinated approaches to transitional and reparatory justice.** European and national authorities should support independent, adequately resourced investigations and expert or truth mechanisms, drawing on Roma-led research and ADI-ROM recommendations. Processes should enable acknowledgement, access to records, appropriate individual and collective reparations, institutional reform and guarantees of non-repetition, while respecting national historical contexts.

5. **Guarantee Roma leadership in representation.** Cultural, educational and media institutions should involve Roma experts and organisations—including Roma women and young people—in agenda-setting, curriculum development, funding, governance and evaluation.

6. **Monitor delivery and outcomes.** The Commission and national authorities should publish evidence on curriculum implementation, language access, cultural funding, remembrance and institutional accountability, including through enlargement monitoring, and require corrective action when commitments remain symbolic or inaccessible.

11. INTERSECTIONALITY AND TARGETED MEASURES

11.1. European policy commitments and progress since 2021

The EU Roma Strategic Framework 2020–2030 recognises diversity within Roma communities and calls for intersectional approaches to equality, inclusion and participation. The 2021 Council Recommendation calls on Member States to address the particular circumstances of Roma women, children, young people, older people and persons with disabilities. These commitments require policy design that recognises how antigypsyism interacts with sexism, ageism, ableism, discrimination based on sexual orientation or gender identity, and barriers connected to migration and legal status.[97]

Intersectionality must be understood as a structural issue, rather than simply the identification of groups experiencing multiple disadvantages. As emphasised in the October 2026 contribution of the civil society Working Group on the Definition of Structural Racism, coordinated by ERGO Network within the European Commission's Civil Society Forum on Combating Racism, historically rooted racism interacts with other systems of inequality through laws, institutional practices, public policies, social norms, narratives and resource allocation. These interconnected mechanisms can reproduce and reinforce racial inequalities, generating cumulative and intergenerational effects even without explicitly discriminatory intent. An intersectional approach must therefore examine both the structural mechanisms producing inequalities and their consequences, while identifying institutional responsibilities for addressing them.[98]

The EU Gender Equality Strategy, Strategy for the Rights of Persons with Disabilities and LGBTIQ equality policy framework provide additional avenues for mainstreaming Roma equality, alongside the EU Roma framework. Their existence does not establish that Roma experiencing multiple forms of discrimination can access effective remedies, adequate services or decision-making. National Roma strategies need clearly assigned responsibilities, budgets and outcomes that can be monitored without compromising privacy or safety.[99]

The Commission's 2024 implementation assessment highlights uneven delivery of national Roma strategies. ERGO's 2026 survey contributes civil society assessments of policy attention; it does not directly measure the prevalence of intersectional discrimination or the effectiveness of remedies.[100]

97 European Commission, A Union of Equality: EU Roma Strategic Framework for Equality, Inclusion and Participation, COM(2020) 620 final, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0620; Council Recommendation of 12 March 2021 on Roma equality, inclusion and participation, 2021/C 93/01, https://eur-lex.europa.eu/eli/reco/2021/319/oj.

98 Civil Society Working Group on the Definition of Structural Racism, coordinated by ERGO Network, joint contribution to the European Commission's Civil Society Forum on Combating Racism, October 2026.

99 European Commission (2026), *Gender Equality Strategy 2026–2030*, adopted 5 March 2026, https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/gender-equality/gender-equality-strategy_en; European Commission (2021), *Union of Equality: Strategy for the Rights of Persons with Disabilities 2021–2030*, COM(2021) 101 final, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021DC0101; European Commission (2025), *Union of Equality: LGBTIQ+ Equality Strategy 2026–2030*, COM(2025) 725 final, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52025DC0725.

100 European Commission, Report on the implementation of national Roma strategic frameworks, COM(2024) 422 final, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52024DC0422.

The Commission's 2026 report recognises intersecting disadvantages experienced by Roma women and LGBTIQ+ Roma and points to the relevance of the EU Gender Equality and LGBTIQ+ Equality Strategies. These policy references are not a substitute for disaggregated, rights-compliant monitoring of whether measures reach differently situated groups.[101]

11.2. ERGO Network's 2026 civil society monitoring findings

ERGO Network's 2026 civil society survey examined the adequacy of targeted measures for Roma women and girls, children and young people, older Roma, Roma persons with disabilities and LGBTIQ+ Roma, alongside policy attention to mobile EU Roma, Roma migrants, returnees and Roma who are stateless or at risk of statelessness.

EU Member States

Roma women and girls. One of 35 respondents considered measures adequate, 19 reported measures to some extent, 14 considered them insufficient or absent, and one did not know. This indicates some policy recognition but little confidence in adequate delivery. It does not show whether Roma women's organisations lead or influence the measures.

Children and young people. Two respondents considered measures adequate, 22 reported measures to some extent, ten insufficient or absent measures and one did not know. Greater reported policy attention must not be confused with effective protection, educational equality or adequate social services.

Older Roma and Roma persons with disabilities. No respondent reported adequate measures for either group. For older Roma, 26 reported insufficient or absent measures, six some measures and three did not know. For Roma persons with disabilities, 29 reported insufficient or absent measures, three some measures and three did not know. These are among the most pronounced perceived policy gaps.

LGBTIQ+ Roma. No respondent considered measures adequate; 25 reported insufficient or absent measures, three some measures, and seven did not know or selected not applicable. These responses do not establish the absence of services in any specific country. Confidentiality, non-discrimination and safe access to remedies are especially important.

Mobility, migration and statelessness. Seventeen of 35 respondents reported no specific measures, 14 limited measures, one did not know and three selected not applicable; none reported adequate measures. These assessments concern policy provision, not the number of Roma affected by migration-related or documentation barriers.

Enlargement countries

Roma women and girls and younger Roma. One of 16 respondents reported adequate measures for Roma women and girls, nine some measures and six insufficient or absent measures. For children and young people, none reported adequate measures, ten some measures and six insufficient or absent measures.

Older Roma and Roma persons with disabilities. No respondent reported adequate measures. Fourteen of 16 considered measures for older Roma insufficient or absent and two reported some measures. For Roma persons with disabilities, 13 reported insufficient or absent measures and three some measures.

LGBTIQ+ Roma. None reported adequate measures; 12 considered them insufficient or absent, two reported some measures, and two did not know or selected not applicable. The survey cannot establish whether safe and confidential services exist in each country.

Migrants, returnees and stateless Roma. Eleven of 16 respondents reported limited measures, four none

101 European Commission, COM(2026) 602 final, section IV.

and one did not know; none reported adequate measures. The enlargement question explicitly includes returnees and therefore should not be combined mechanically with the EU question.

11.3. Comparative assessment and key conclusions

Across both samples, respondents rarely assessed targeted measures as adequate. Perceived gaps were especially pronounced for older Roma, persons with disabilities and LGBTIQ+ Roma. Roma women and girls and children received somewhat greater reported attention, but "to some extent" is not evidence of adequate coverage or results. These differences must not be presented as a hierarchy of rights or a ranking of countries.

The findings expose a broader design and accountability problem: horizontal equality commitments may coexist with insufficiently differentiated measures and limited attention to the structural mechanisms producing intersecting inequalities. Targeted policies may recognise particular groups without examining how discriminatory institutional practices, inaccessible services, eligibility requirements, unequal resource allocation and weak enforcement interact to restrict access to rights. For example, the barriers faced by Roma women with disabilities cannot be adequately addressed through separate Roma inclusion, gender equality and disability policies if the institutions delivering services fail to recognise their combined effects. Policy must also recognise Roma agency and leadership, rather than presenting disadvantage as inherent to Roma communities.

Mobility and legal status can create additional barriers through civil registration, identity documents, residence-related eligibility and interruptions in social protection. Statelessness or risk of statelessness requires accessible procedures and remedies. Neither survey version establishes how particular national procedures operate or which groups are affected most severely.

An intersectional approach must identify not only who experiences disadvantage, but how institutions and policies produce, perpetuate or fail to remedy it. Monitoring should examine discriminatory practices, eligibility rules, accessibility barriers, resource allocation and enforcement failures alongside unequal outcomes, including cumulative and intergenerational effects. The absence of comprehensive disaggregated data must not justify institutional inaction where civil society evidence, complaints and qualitative research document structural barriers. Data collection must remain voluntary, proportionate, ethically governed and privacy-protective, particularly where intersecting characteristics create risks of identification.

The mid-term review of national Roma frameworks should test not only whether targeted measures are named, but whether they have responsible institutions, sufficient funding, accessible delivery mechanisms, effective remedies and demonstrated outcomes. Mainstream equality and social policies should be assessed alongside Roma-specific measures, since responsibility cannot rest exclusively with National Roma Contact Points.

11.4. Recommendations

1. **Operationalise intersectionality through structural and institutional reform.** Identify how antigypsyism interacts with other forms of discrimination through laws, institutional practices, eligibility rules, service provision and resource allocation. Translate these findings into adequately funded, time-bound measures with clear institutional responsibilities, enforceable safeguards and meaningful participation by the Roma groups concerned.

2. **Advance Roma women's and girls' equality and leadership.** Address intersecting discrimination in education, employment, healthcare, protection from violence and public participation, and provide sustainable support for independent Roma women-led organisations.

3. **Address age- and disability-related barriers.** Ensure accessible public services, reasonable accommodation, adequate social protection, independent living and meaningful participation by older Roma and Roma persons with disabilities.

4. **Protect and include LGBTIQ+ Roma.** Guarantee confidential complaints, non-discriminatory services, safe referral mechanisms and participation that does not expose individuals to discrimination or unwanted disclosure.

5. **Remove mobility and documentation barriers.** Improve civil registration, prevent and address statelessness and ensure effective access to services and legal remedies for mobile Roma, migrants and returnees.

6. **Monitor structural and intersectional inequalities and ensure accountability.** Develop voluntary, privacy-protective and rights-based equality data, complemented by qualitative research and Roma civil society evidence. Assess not only unequal outcomes but also the institutional practices and policy mechanisms producing them, including cumulative and intergenerational effects. Require investigation and corrective action where barriers are documented, even when comprehensive disaggregated data are unavailable. Establish clear institutional responsibilities, measurable targets, independent monitoring and accessible remedies, and ensure that findings lead to concrete policy changes, adequate resource allocation and regular public reporting on progress, including through the Commission's monitoring of Roma equality in enlargement countries.

12.
ROMA CHILDREN, CHILD POVERTY AND PREVENTION OF FAMILY SEPARATION

12.1. European policy commitments and progress since 2021

The Commission's 2026 assessment reports that 77% of Roma children covered by the FRA Roma Survey 2024 were at risk of poverty. Its housing analysis also recognises the importance of adequate accommodation for family-based care and the prevention of unnecessary family separation. These findings reinforce the need to connect the European Child Guarantee with housing, income support and non-discriminatory child protection, without inferring a Europe-wide causal rate of family separation from poverty data.[102]

The EU Roma Strategic Framework 2020–2030 commits to halving the poverty gap between Roma children and other children, reducing inequalities in early childhood education and care, and addressing school segregation. The 2021 Council Recommendation calls for measures tackling intergenerational poverty and unequal access to education, healthcare, housing, social protection and essential services. These commitments require action against structural antigypsyism and the institutional barriers affecting Roma children and their families.[103]

The European Child Guarantee provides an additional framework for addressing child poverty and exclusion through effective access to early childhood education and care, education, healthcare, healthy nutrition and adequate housing. ERGO Network's six-country research[104] finds that all countries examined have relevant Child Guarantee measures, but Roma children are explicitly identified as a priority group in only four national action plans: Bulgaria, Romania, Slovakia and Spain. The challenge is to translate these commitments into accessible services, adequate funding and measurable improvements, in coordination with national Roma strategies.[105]

Child protection policies must respect children's best interests, the right to family life and the principle that poverty or material deprivation alone must never justify separation from parental care. Authorities must distinguish genuine protection concerns from difficulties caused by inadequate housing, income insecurity or inaccessible services, and provide timely assistance and effective safeguards.[106]

102 European Commission, COM(2026) 602 final, sections II.II and II.VII.

103 European Commission, A Union of Equality: EU Roma Strategic Framework for Equality, Inclusion and Participation for 2020–2030, COM(2020) 620 final; Council Recommendation of 12 March 2021 on Roma equality, inclusion and participation, 2021/C 93/01.

104 ERGO Network (2026), Roma Child Poverty and the Prevention of Family Separation, synthesis report and six national case studies (Bulgaria, Czechia, Hungary, Romania, Slovakia and Spain), Brussels: ERGO Network

105 Council Recommendation (EU) 2021/1004 of 14 June 2021 establishing a European Child Guarantee; ERGO Network, Roma Child Poverty and the Prevention of Family Separation in Bulgaria, Czech Republic, Hungary, Romania, Slovakia and Spain, November 2026, section "Roma Children in the Child Guarantee – National Action Plans".

106 UN Convention on the Rights of the Child, Articles 3, 9, 12, 18, 20 and 27; UN General Assembly, Guidelines for the Alternative Care of Children, resolution 64/142, paragraph 15.

12.2. ERGO Network's 2026 civil society monitoring findings

ERGO Network's 2026 civil society survey examined measures addressing Roma child poverty, access to social protection and family support, the situation of Roma children and young people, and safeguards against unnecessary family separation.

EU Member States

Measures addressing Roma children and young people. Only two of 35 respondents considered their needs adequately addressed in the implementation of national Roma strategies. Twenty-two reported that these needs were addressed to some extent, ten considered them insufficiently addressed or not addressed at all, and one selected don't know/not applicable. Thus, 32 of 35 respondents (91%) did not consider the measures fully adequate.

Poverty reduction. Twenty-six respondents (74%) assessed measures to reduce Roma poverty and social exclusion as limited or not implemented. Eight reported partial implementation and only one full implementation. Regarding developments since 2021, 22 respondents reported no significant change, nine some deterioration, three some improvement and one did not know. No respondent reported significant improvement.

Access to social protection and essential support. Only two respondents reported systematic measures to improve access to minimum-income schemes, social security and social assistance. Twenty described implementation as partial or limited, twelve reported no measures and one did not know.

Taken together, these findings suggest that respondents perceive insufficient policy attention to Roma children alongside broader weaknesses in poverty reduction and access to social protection. However, the survey does not establish how these implementation gaps affect individual children or families.

Enlargement countries

Measures addressing Roma children and young people. None of the 16 respondents considered their needs adequately addressed. Ten reported that these needs were addressed to some extent, while six considered them insufficiently addressed or not addressed at all.

Poverty reduction. Six respondents assessed poverty-reduction measures as partially implemented, six as limited and four as not implemented. None reported full or large-scale implementation. Four respondents perceived some improvement in Roma poverty and social exclusion since 2021; the remaining twelve did not report improvement, including one respondent who selected both no significant change and some deterioration.

Access to social protection and essential support. Two respondents reported systematic measures, nine partial or limited implementation, four no measures and one did not know.

The enlargement findings similarly indicate substantial perceived implementation gaps. Although national circumstances and social protection systems differ, the responses underline the need to strengthen the integration of Roma children's needs into mainstream child poverty, social protection and inclusion policies.

12.3. Comparative assessment and key conclusions

Across both survey groups, respondents predominantly assess measures addressing Roma children as only partially effective or insufficient. These findings are consistent with broader concerns about poverty reduction and access to social protection, but do not establish child-specific outcomes. ERGO Network's six-country research provides additional evidence of the structural barriers affecting Roma children and the risks these create for family stability.

Child poverty is multidimensional and structurally produced. Inadequate housing, food insecurity, residential segregation, unequal access to education and healthcare, labour-market discrimination affecting parents and insufficient social protection reinforce one another. Drawing on FRA's 2025 findings, ERGO's research reports that 77% of surveyed Roma and Traveller children live in households at risk of poverty, compared with 19% of children in the general EU population. These figures demonstrate the scale of inequality in the populations surveyed, although national estimates vary in coverage and methodology.

Material deprivation can be misinterpreted as parental failure. The six-country research identifies situations in which inadequate housing, school absences, missed medical appointments and administrative difficulties trigger institutional scrutiny rather than timely support. It raises particular concerns about the influence of material deprivation on child protection decisions in Hungary and Slovakia, and the escalation of school-attendance or administrative difficulties in Bulgaria, Czechia and Spain. These examples do not establish that every intervention is discriminatory. They demonstrate the importance of assessing whether institutions adequately distinguish poverty-related needs from genuine risks to children's safety.

Preventive support remains fragmented and insufficiently accessible. The Czech case study draws on Life Together's work with 1,292 families and 4,522 children, illustrating the accumulation of housing, financial and educational difficulties and the importance of coordinated assistance. Romania's research highlights the contribution of health mediators and integrated community services, alongside gaps in coverage. Bulgaria proposes a coordinated approach based on one family, one plan and one coordinator, while the Spanish study emphasises practical assistance before hardship escalates into a child protection crisis.

The legal dimension is illustrated by *European Roma Rights Centre (ERRC) v. Czech Republic* (Complaint No. 190/2020), in which the European Committee of Social Rights examined the disproportionate institutionalisation of Roma children and shortcomings in the state response. This reinforces the importance of effective preventive services, non-discriminatory assessments and accountability for institutional practices.[107]

Prevention of unnecessary family separation must be treated as a child-rights and equality obligation. Governments have a duty to protect children from harm, but also to address the conditions that undermine family well-being. Where institutions fail to provide adequate housing, income support and accessible services, punitive responses to material deprivation risk compounding the very inequalities that public policies should remedy. Antigypsyism must therefore be examined in professional assessments, eligibility rules, placement decisions and access to reunification support.

The available evidence does not establish a Europe-wide causal or statistical relationship between Roma poverty and child removal. Stronger monitoring is needed to identify disparities in referrals, removals, alternative care, reunification and access to preventive services, supported by appropriate data safeguards, independent reviews and Roma-led research.

The central conclusion is that reducing Roma child poverty and preventing unnecessary family separation require coordinated action across social protection, housing, education, healthcare and child protection systems. Recognition of Roma children in national strategies and Child Guarantee plans is important, but must be accompanied by accessible services, institutional accountability and measurable outcomes.

107 European Committee of Social Rights, European Roma Rights Centre (ERRC) v. Czech Republic, Complaint No. 190/2020, decision on the merits made public April 2024.

12.4. Recommendations

1. **Make Roma child poverty reduction measurable.** Governments should establish funded objectives within national Roma strategies and relevant child poverty policies, including European Child Guarantee action plans in EU Member States, addressing income insecurity, housing, nutrition, education, healthcare and essential services. Progress should be monitored through appropriate, rights-compliant indicators and independent assessments.

2. **Guarantee early, coordinated and accessible family support.** Governments should provide sustained local and outreach services combining income and housing assistance, childcare, educational support, mediation and counselling. Support should be available before difficulties escalate into child protection proceedings, with clear responsibilities across services.

3. **Prevent discriminatory and unnecessary family separation.** Authorities must ensure that poverty or inadequate housing alone never justifies removal from parental care. Child protection decisions should be based on individual assessments, effective safeguards, accessible legal assistance and independent review, with professional training addressing antigypsyism and discriminatory assumptions.

4. **Prioritise family-based care, safe reunification and participation.** Where separation is necessary to protect a child, authorities should prioritise appropriate family-based care and safe reunification consistent with the child's best interests. Roma children and parents must have accessible opportunities to participate in decisions affecting them, while Roma-led organisations should contribute to service design and independent oversight.

5. **Strengthen coordination, evidence and accountability.** National Roma Contact Points, Child Guarantee Coordinators, where applicable, child protection authorities and relevant ministries should establish joint implementation and monitoring arrangements. Governments should examine disparities in access to services and child protection outcomes, investigate discriminatory patterns and introduce corrective measures, supported by sustainable national and EU funding.

13.
EQUALITY BODIES, ACCESS TO JUSTICE AND EFFECTIVE REMEDIES

13.1. European policy commitments and developments since 2021

The EU Roma Strategic Framework for Equality, Inclusion and Participation 2020–2030 and the 2021 Council Recommendation recognise the need to combat antigypsyism, strengthen protection against discrimination and ensure access to justice and effective remedies. These commitments require more than anti-discrimination legislation: they depend on independent equality bodies, accessible judicial procedures, effective investigations and remedies addressing both individual violations and discriminatory institutional practices.[108]

Two EU directives adopted in 2024 establish stronger standards for equality bodies. Directive (EU) 2024/1499 covers, among other grounds, racial or ethnic origin; Directive (EU) 2024/1500 concerns equality between women and men in employment and occupation. Both required transposition by 19 June 2026. Directive 2024/1499 provides concrete benchmarks relevant to Roma complainants: free and accessible services, including in rural and remote areas; assistance to victims; inquiries; reasoned opinions or decisions; and powers to participate in litigation. Its provisions on independence, resources and cooperation with civil society are equally important. However, legislative transposition alone does not establish whether Roma can obtain effective protection.[109]

The Commission's July 2026 assessment of the Racial Equality and Employment Equality Directives identifies continuing barriers to justice, including litigation costs, difficulties obtaining evidence, problems applying the burden-of-proof rules, inadequate sanctions and gaps in judicial training. It also points to the limited use of remedies capable of addressing discriminatory practices beyond individual cases. These shortcomings concern the full justice process, from reporting and investigation to litigation, sanctions and enforcement.[110]

The Commission's 2026 Rule of Law Report and the European Parliament's fundamental rights work provide wider context on judicial independence, legal aid, effective judicial protection and institutional accountability. Although not Roma-specific, these are necessary conditions for enforcing Roma rights.[111]

Romania illustrates the importance of institutional effectiveness. The Commission's 2026 country

108 European Commission, A Union of Equality: EU Roma Strategic Framework for Equality, Inclusion and Participation for 2020–2030, COM(2020) 620 final; Council Recommendation of 12 March 2021 on Roma equality, inclusion and participation, 2021/C 93/01. Source: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0620; https://eur-lex.europa.eu/eli/reco/2021/319/oj

109 Council Directive (EU) 2024/1499 of 7 May 2024 on standards for equality bodies in the field of equal treatment irrespective of racial or ethnic origin, among other grounds; Directive (EU) 2024/1500 of the European Parliament and of the Council of 14 May 2024 on standards for equality bodies in the field of equal treatment and equal opportunities between women and men in matters of employment and occupation. Source: https://eur-lex.europa.eu/eli/dir/2024/1499/oj ; https://eur-lex.europa.eu/eli/dir/2024/1500/oj

110 European Commission, Report on the application of Council Directive 2000/43/EC and Council Directive 2000/78/EC, COM(2026) 364 final, 13 July 2026.Source: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52026DC0364

111 European Commission, 2026 Rule of Law Report, communication and country chapters, July 2026; European Parliament, resolution on fundamental rights in the European Union in 2024 and 2025, 29 April 2026.Source: https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/upholding-rule-law/rule-law/annual-rule-law-cycle_en

assessment of non-discrimination law identifies concerns about the functioning of the National Council for Combating Discrimination, including complaint-handling delays and difficulties ensuring timely responses. The question is not only what powers equality bodies possess in law, but whether they can exercise them independently and effectively.[112]

The Commission's 2026 report highlights continued underreporting of discrimination, concerns about ethnic profiling and the disproportionate use of force, and limitations in the independence, resources or powers of some equality bodies. It also confirms that the Commission will monitor the transposition of the 2024 equality-body directives, including through infringement procedures where warranted.[113]

13.2. Findings from ERGO Network's 2026 civil society monitoring

ERGO Network's 2026 civil society survey examined institutional responses to discrimination by public authorities, accessibility of reporting and redress mechanisms, and professional training relevant to effective protection and access to justice.

EU Member States

ERGO Network's monitoring reveals significant shortcomings in measures addressing discriminatory misconduct by public authorities (Q17). None of the 35 EU respondents assessed these measures as fully implemented. Six assessed implementation as partial, 15 as limited and 14 reported no implementation. Thus, 29 of 35 respondents (83%) reported limited or no implementation. These assessments raise important questions about oversight and accountability, but do not themselves measure the outcomes of independent investigations or court proceedings.

Access to reporting and redress is a particular concern (Q18). Only one of the 35 EU respondents considered that Roma had effective access to trusted and accessible mechanisms for reporting discrimination and seeking redress; 22 assessed access as partial and 12 reported no such effective access. These responses concern perceived accessibility of reporting and redress mechanisms. They do not establish the performance of individual equality bodies, the outcomes of court proceedings or whether remedies were ultimately enforced.

Professional capacity presents further challenges (Q19). Systematic antigypsyism and anti-discrimination training was reported as almost entirely absent across the professional groups assessed; only one EU respondent identified systematic training for law enforcement, and none identified systematic training for the judiciary. The questionnaire covers public administration, teachers and education professionals, law enforcement, the judiciary and healthcare professionals. These responses indicate a need to examine whether relevant institutions are equipped to recognise and address antigypsyism; they are not a direct assessment of judicial decisions.

The survey also identifies weaknesses in the broader evidence and prevention environment. Only one EU respondent unequivocally confirmed government collection and publication of data allowing discrimination against Roma and antigypsyism to be monitored (Q15). Twenty-eight reported little or no progress on anti-Roma hate speech and hate crime, and four reported regression (Q16). These findings provide context for institutional accountability, but neither question measures the effectiveness of equality bodies or courts.

112 European Commission, Country report on non-discrimination: Romania, 2026 (national expert Romanița Iordache); European Commission against Racism and Intolerance (ECRI), sixth report on Romania, published 30 October 2025.Source: https://op.europa.eu/en/publication-detail/-/publication/8dcd8f80-7a74-11f1-bf5e-01aa75ed71a1; https://www.coe.int/en/web/european-commission-against-racism-and-intolerance/romania

113 European Commission, COM(2026) 602 final, sections II.I and IV.

Enlargement countries

Similar concerns emerge in the nine enlargement countries, excluding Georgia as agreed (16 responses). For measures against discriminatory misconduct by public authorities (Q17), none reported full implementation; seven reported partial implementation, six limited implementation and three no implementation. On access to trusted reporting and redress mechanisms (Q18), two respondents answered yes, 12 partially and two no. These findings concern respondents' assessments of implementation and access, not verified outcomes of equality-body complaints or litigation.

The survey does not directly assess the independence, resources or powers of equality bodies, judicial outcomes, legal aid or enforcement of decisions. Those questions are therefore examined below through EU legal standards, external research and case law, rather than presented as findings of ERGO's questionnaire.

13.3. Comparative assessment: from formal protection to effective justice

The gap between formal legal protection and lived equality is particularly evident in access to justice. The existence of anti-discrimination legislation, equality bodies and complaint mechanisms does not necessarily mean that Roma can exercise their rights or obtain effective remedies. ERGO's survey provides evidence about perceived access to reporting and redress and measures addressing misconduct by public authorities; it does not evaluate individual equality bodies or courts. The wider institutional assessment must therefore draw on equality-law obligations, independent research and jurisprudence. Relevant tests include accessibility, independence, responsiveness to structural and intersectional discrimination, timely investigation, follow-up to decisions and prevention of recurrence.

Across EU Member States and enlargement countries, respondents reported shortcomings in measures addressing misconduct by public authorities and in access to reporting and redress (Q17–Q18). These are serious warning signs where discrimination involves institutions responsible for protecting rights. They justify closer scrutiny of complaint pathways and accountability mechanisms, without establishing that particular bodies or judicial proceedings failed in specific cases.

FRA's Roma Survey 2024 reinforces these concerns: only 6% of Roma and Travellers who experienced discrimination reported it, compared with 16% in the earlier survey, while fewer than half were aware of an equality body. These figures relate to FRA's surveyed populations and countries, not all Roma in Europe. Low reporting means that official complaint figures capture only a fraction of experienced discrimination and highlights barriers including distrust, fear of retaliation, lack of information and limited legal assistance.[114]

The judiciary is central to closing this gap. Effective judicial protection requires more than the possibility of bringing a case before a court. Judges and prosecutors must be equipped to recognise antigypsyism, including racial profiling, indirect discrimination and institutional or structural racism; assess patterns of discriminatory conduct; apply evidentiary rules correctly; and ensure effective, proportionate and dissuasive sanctions. This is particularly important where public authorities hold relevant evidence and complainants face substantial inequalities in resources and representation.[115]

European human rights jurisprudence demonstrates the importance of judicial recognition of antigypsyism. In Lingurar v. Romania (2019), the European Court of Human Rights examined ethnic profiling in a police operation against a Roma family and identified institutionalised racism. In D.H. and Others v. the Czech Republic (2007), it established principles on indirect discrimination and the evidentiary significance of statistics in Roma school segregation. In Szolcsán v. Hungary (2023), the Court highlighted the need for effective measures to address segregation. These judgments show litigation's potential to challenge

114 European Union Agency for Fundamental Rights (FRA), Roma Survey 2024, findings published in 2025, discrimination reporting and awareness of equality bodies. Source: https://fra.europa.eu/en/publications-and-resources/data-and-maps/2025/roma-survey-2024 Survey covers 13 European countries (2024).

115 European Commission, COM(2026) 364 final, 13 July 2026, discussion of access to justice, burden of proof, sanctions and judicial training. Source: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52026DC0364

discriminatory institutional practices, but favourable decisions do not automatically produce structural change.[116]

ERRC research and litigation, including its 2024 reports on policing Roma in the EU and the Balkans, further document discriminatory policing, police violence and barriers to accountability. Such cases illustrate the importance of independent investigations, effective prosecutorial and judicial responses, and remedies that address institutional failures rather than treating violations as isolated incidents.[117]

Roma civil society also plays an essential role in facilitating access to justice: helping people recognise discrimination, document violations, navigate complaint procedures and secure legal representation. Strategic litigation can expose patterns not visible in official statistics, but requires sustainable resources, legal expertise and an enabling civic environment. Roma-led organisations should be supported as actors in enforcing equality rights, not only consulted after procedures have been designed.

The 2024 Equality Bodies Directives provide a concrete framework for such scrutiny. In particular, Directive 2024/1499 requires accessible and free equality-body services, assistance to complainants, inquiry powers and a role in litigation, as well as mechanisms for following up opinions or enforcing binding decisions. These requirements make equality bodies central to the chapter even though ERGO's survey does not evaluate their individual performance. Implementation should be assessed alongside courts, prosecutors, law-enforcement oversight and the enforcement of remedies, with attention to whether institutional responses prevent further discrimination.

13.4. Recommendations

1. **Ensure effective implementation of the EU Equality Bodies Directives.** Member States should guarantee equality bodies' independence, adequate resources, accessibility and effective powers, including assistance to victims and responses to structural and intersectional discrimination. The Commission should monitor outcomes, not only legislative transposition. The Commission should also assess the independence, accessibility and effectiveness of equality bodies in enlargement countries as part of its monitoring of fundamental rights and anti-discrimination reforms.

2. **Strengthen judicial protection and access to effective remedies.** Member States and enlargement-country governments should remove financial, procedural and evidentiary barriers, ensure accessible legal aid and strengthen judges' and prosecutors' capacity to address antigypsyism. Training should cover indirect discrimination, ethnic profiling, intersectionality, the burden of proof, and effective, proportionate, and dissuasive sanctions.

3. **Ensure accountability for discrimination by public authorities.** Governments should guarantee independent investigations into discriminatory policing, racial profiling and other institutional misconduct, with appropriate judicial and disciplinary consequences, safeguards against retaliation and remedies addressing the practices responsible.

116 European Court of Human Rights, Lingurar v. Romania, application no. 48474/14, judgment of 16 April 2019; D.H. and Others v. the Czech Republic [GC], application no. 57325/00, judgment of 13 November 2007; Szolcsán v. Hungary, application no. 24408/16, judgment of 30 March 2023. Source: https://hudoc.echr.coe.int/eng?i=001-192466; https://hudoc.echr.coe.int/eng?i=001-83256; https://hudoc.echr.coe.int/eng?i=001-223709.

117 European Roma Rights Centre (2024), Ruthless and Racist: Policing Roma in the Balkans, Source: https://www.errc.org/reports-submissions/ruthless-and-racist-policing-roma-in-the-balkan; European Roma Rights Centre (2022), Brutal and Bigoted: Policing Roma in the EU, Source: https://www.errc.org/reports--submissions/brutal-and-bigoted-policing-roma-in-the-eu.

4. **Support Roma civil society and strategic litigation.** EU and national authorities should sustainably support Roma-led organisations that provide rights awareness, community-based legal assistance, documentation, and strategic litigation, while safeguarding their independence.

5. **Monitor the effectiveness of reporting, justice and enforcement mechanisms.** Authorities and equality bodies should publish appropriately safeguarded information on reporting barriers, access to assistance, complaint handling, investigation and judicial outcomes, follow-up to decisions and prevention of recurrence, with meaningful Roma participation. Such monitoring should distinguish access to a mechanism from the effectiveness of the remedy obtained.

14.
MONITORING, INDICATORS AND FUNDING

14.1. European policy commitments and progress since 2021

The EU Roma Strategic Framework 2020–2030 calls for measurable targets, regular monitoring and effective use of EU and national resources. The 2021 Council Recommendation asks Member States to establish or strengthen monitoring arrangements, improve equality data and make adequate funding available for implementation. These obligations are linked: indicators cannot demonstrate change without reliable evidence, and budget commitments cannot be assessed without transparent allocation and expenditure information.[118]

The EU Roma Strategic Framework is accompanied by a Portfolio of Indicators, developed by the FRA-coordinated Working Party on Roma equality, inclusion and participation indicators and reporting and annexed to the Commission's 2020 Communication. Its structure–process–outcome model distinguishes legal and policy commitments, measures taken to implement them, and changes in the enjoyment of rights experienced by Roma. The portfolio provides a common reference for national targets and the EU's 2030 objectives, while allowing national adaptation. The Commission envisages biennial Member State reporting using the portfolio; a key question is whether national monitoring measures outcomes, rather than counting activities alone.[119]

The Commission's Anti-Racism Strategy 2026–2030 adds a further commitment to prepare a Recommendation to improve the collection, analysis and use of disaggregated equality data, in line with national legal frameworks. It also identifies the role of national statistical offices, Eurostat, FRA and other EU agencies in improving comparability, technical capacity and intersectional evidence. The Recommendation remains a planned initiative, not an adopted instrument. Its preparation is an opportunity to ensure that Roma civil society and affected communities shape the safeguards, indicators and practical use of data.[120]

Since 2021, national Roma frameworks have been accompanied by reporting arrangements and EU funding opportunities. Yet the Commission's 2024 implementation assessment identifies persistent variation in the specificity of targets, monitoring capacity and financing. National strategies may name programmes or funding streams without making it possible to identify amounts actually spent on Roma equality or to establish who benefited. The central test is whether authorities can trace resources to actions and outcomes, rather than simply report activities.[121]

FRA's survey and indicator work can complement administrative reporting and civil society monitoring, but these sources answer different questions: population-level outcomes, institutional measures and

118 European Commission, A Union of Equality: EU Roma Strategic Framework for Equality, Inclusion and Participation, COM(2020) 620 final, 7 October 2020; Council Recommendation of 12 March 2021 on Roma equality, inclusion and participation (2021/C 93/01).

119 European Commission, Annex to COM(2020) 620 final, Portfolio of indicators, 7 October 2020, https://commission.europa.eu/system/files/2020-10/portfolio_of_indicators_en.pdf; Council Recommendation (2021/C 93/01), paras 38–39.

120 European Commission, A Union of Equality: Anti-Racism Strategy 2026–2030, COM(2026) 12 final, section on equality data, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52026DC0012.

121 European Commission (2024), *Report on the implementation of the national Roma strategic frameworks in light of the EU Roma strategic framework for equality, inclusion and participation and the Council Recommendation on Roma equality, inclusion and participation*, COM(2024) 422 final, 25 September 2024, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52024DC0422.

communities' assessments should be triangulated rather than treated as interchangeable.[122]

Monitoring must be rights-based and methodologically sound. Administrative records and project outputs can support oversight, but they cannot replace outcome indicators, independent assessment and evidence from Roma communities. Data collection must be lawful, proportionate, voluntary where appropriate, privacy-protective and designed with Roma participation. This chapter focuses on Q51–Q53; governance responsibilities and institutional accountability are addressed separately.

The Commission's 2026 report states that 20 Member States regularly monitor national Roma strategies and have defined at least one quantitative or qualitative target. Yet some national indicator systems remain incomplete, and reporting still frequently emphasises outputs rather than outcomes. This official description should be read alongside—not conflated with—ERGO respondents' assessments of the accessibility and credibility of monitoring and traceable funding. The Commission also reports approximately EUR 1.8 billion of ESF+ support for Roma-targeted interventions across 15 Member States in 2021–2027; this is a programming figure, not evidence of expenditure or impact.[123]

14.2. ERGO Network's 2026 civil society monitoring findings

ERGO Network's 2026 civil society survey examined the use of measurable national targets and indicators, the contribution of EU or pre-accession funding, and the visibility and traceability of national public funding for Roma strategies.

EU Member States

Targets and indicators. Only two of 35 respondents (6%) said measurable national targets and indicators were used; 16 (46%) reported partial use, 13 (37%) reported none and four (11%) did not know. The distinction between partial and systematic use matters: a strategy may include indicators for some sectors while lacking baselines, consistent reporting or measures of discrimination and desegregation.

Use of EU funds. Three respondents (9%) assessed EU funding as supporting Roma framework implementation to a significant extent, 11 (31%) to some extent, 11 (31%) to a limited extent, eight (23%) not at all and two (6%) did not know. These responses describe perceived use of funds, not the amounts committed or spent. They suggest uneven visibility and reach of EU-funded interventions.

Traceability of national funding. Only three respondents (9%) considered national public funding clearly identifiable and traceable. Thirteen (37%) reported partial traceability, 13 (37%) none, one did not know and five selected qualified other responses. The large share reporting partial or no traceability limits civil society's ability to assess whether commitments are adequately financed or implemented.

Interpretation. The findings point to a three-stage evidence gap: targets may be incomplete; EU-funded measures may not be visible or accessible to Roma communities; and national allocations may not be traceable to actual expenditure. Even where funding exists, reporting should distinguish planned budgets, contracted funds, disbursement, beneficiaries and outcomes.

Enlargement countries

Targets and indicators. Among the 16 enlargement respondents, two respondents reported measurable targets and indicators in use, ten reported partial use, two reported none and two did not know. Partial use predominates, but it does not establish that monitoring is sufficiently independent or outcome-oriented.

122 European Union Agency for Fundamental Rights (FRA), Roma Survey 2024; European Commission, Roma equality, inclusion and participation: monitoring and reporting, https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/combatting-discrimination/roma-eu/reports_en.

123 European Commission, COM(2026) 602 final, sections I and IV.

Use of EU and pre-accession funds. None of the 16 respondents considered funding to support implementation to a significant extent; four reported support to some extent, seven to a limited extent, three none and two did not know. These findings should be interpreted within enlargement countries' different funding instruments and administrative arrangements, not treated as directly equivalent to EU Member State allocations.

Traceability of national funding. One respondent considered national allocations clearly identifiable and traceable, ten reported partial traceability and five reported none. The prevalence of partial traceability raises questions about whether national authorities publish budget lines and expenditure information in a form that allows Roma civil society to follow resources through to implementation.

Interpretation. In enlargement contexts, both domestic financing and externally supported programmes require transparent reporting. Public information should identify which authority controls the funds, the objectives and locations supported, and how results are independently assessed. The survey cannot determine whether particular projects represent good value for money or quantify national spending.

14.3. Comparative assessment and key conclusions

Both samples reveal limited confidence in fully operational monitoring and transparent financing. Only two respondents in each sample confirmed the use of measurable targets and indicators. National funding was clearly traceable for three of 35 EU respondents and one of 16 enlargement respondents. These are respondent-level assessments; they do not demonstrate that no formal monitoring or budget system exists in a given country.

National monitoring evidence illustrates the difference between formal reporting and verifiable implementation. In Romania, Roma Civil Monitor reported difficulties obtaining clear figures on ministries' Roma-strategy allocations and spending. In Slovakia, Roma Civil Monitor documented substantial EU-linked allocations alongside questions about the share of domestic financing and long-term sustainability; announced calls must not be confused with disbursement or outcomes. In Czechia, the contrast between the government's classification of measures as fulfilled and civil society concerns about evaluation methodology illustrates why activity reporting requires independent outcome verification. In Spain, proposed improvements to Roma-related statistical identification remained at the design stage in the monitoring period. These examples should be checked against and cited to the underlying country reports before publication.[124]

The findings also distinguish availability of funding from its traceability. EU or pre-accession funding may support relevant programmes while the contribution to national Roma strategy objectives remains difficult to establish. Without published, comparable information on allocations, spending and outcomes, neither governments nor civil society can reliably evaluate whether resources are adequate, targeted or effective.

The FRA-coordinated portfolio already supplies a common structure–process–outcome reference. The challenge is to operationalise it through national baselines, comparable and appropriately disaggregated data, meaningful Roma participation and public decisions responding to the evidence. The Commission's planned equality-data Recommendation should reinforce this approach while ensuring safeguards against discriminatory profiling, involuntary disclosure and misuse.[125]

124 Roma Civil Monitor (2025), *Civil society monitoring reports on the implementation of the national strategic frameworks for Roma equality, inclusion and participation* in Romania, Slovakia, Czechia and Spain. Publications Office of the European Union, Luxembourg. Country reports: Romania, https://www.romacivilmonitoring.eu/wp-content/uploads/2025/07/RCM2-2024-C1-Romania-FINAL-ISBN.pdf; Slovakia, https://www.romacivilmonitoring.eu/wp-content/uploads/2025/07/RCM2-2024-C1-Slovakia-FINAL-ISBN.pdf; Czechia, https://www.romacivilmonitoring.eu/wp-content/uploads/2025/07/RCM2-2024-C1-Czechia-FINAL-ISBN.pdf; Spain, https://www.romacivilmonitoring.eu/wp-content/uploads/2025/08/RCM2-2024-C1-Spain-FINAL-ISBN.pdf.

125 European Commission, Portfolio of indicators, Annex to COM(2020) 620 final; European Commission, Anti-Racism Strategy 2026–2030, COM(2026) 12 final.

A credible monitoring architecture must combine outcome indicators with disaggregated equality evidence where lawful and appropriate, qualitative community research, independent scrutiny and accessible publication. Data on Roma women and girls and other groups facing intersecting barriers remain especially important, but safeguards against identification, coercion and misuse are essential. The purpose of monitoring is corrective action, not merely administrative compliance.

This chapter focuses on the survey's three specific tests: measurable indicators, EU/pre-accession funding and national budget traceability. The following chapter addresses governance and accountability mechanisms, including who is responsible for acting on the evidence.

14.4. Recommendations

1. **Establish measurable targets and baselines.** National authorities should adopt time-bound indicators on equality, inclusion and participation aligned, as appropriate, with the FRA-coordinated Portfolio of Indicators, with transparent baselines, methodologies and regular public reporting on outcomes rather than activities alone.

2. **Make national Roma expenditure traceable.** Finance ministries and implementing bodies should publish identifiable allocations, actual expenditure, funding sources, responsible authorities and delivery status for Roma strategy measures.

3. **Improve visibility of EU and pre-accession funding.** The Commission and national authorities should link funded actions to Roma framework objectives and disclose programme-level results, including where mainstream funding benefits Roma.

4. **Guarantee independent and participatory monitoring.** Roma-led civil society organisations should have resourced roles in defining indicators, interpreting findings and assessing whether measures reach affected communities.

5. **Collect equality evidence with safeguards.** The Commission should develop its planned equality-data Recommendation with meaningful involvement of Roma-led civil society and affected communities. Statistical authorities should develop lawful, privacy-protective, voluntary where appropriate, and ethically governed approaches to monitoring structural inequalities and intersecting barriers, including qualitative evidence and robust safeguards against misuse.

6. **Connect monitoring to corrective decisions.** Governments and EU institutions should require published responses to evaluation findings, revisions of ineffective measures and follow-up on persistent gaps in implementation and expenditure.

15.
GOVERNANCE AND ACCOUNTABILITY

15.1. European policy commitments and progress since 2021

The 2026 Commission report acknowledges that local implementation remains uneven, with some municipalities reluctant to undertake politically sensitive measures such as desegregation. It calls for stronger mandates and resources for National Roma Contact Points, clearer responsibilities across levels of government and improved outcome monitoring. These findings substantiate the need to hold sectoral ministries, municipalities and managing authorities accountable rather than assigning responsibility solely to Roma coordination structures.[126]

The EU Roma Strategic Framework 2020–2030 and the 2021 Council Recommendation call for stronger coordination, meaningful Roma participation, adequate resources and accountability for implementation. National strategies cannot deliver sustainable change through isolated measures if mainstream institutions responsible for education, employment, housing, health and social protection do not assume responsibility for Roma equality. The central governance question is therefore whether strategic commitments translate into institutional mandates, operational decisions and measurable results.[127]

National Roma Contact Points (NRCPs) are essential to coordinating implementation, but their effectiveness depends on sufficient authority, staffing, resources and access to decision-makers. Coordination without influence over sectoral policies and expenditure risks remaining procedural rather than substantive.

Accountability also extends to the European Commission. The EU Roma Strategic Framework commits its internal Roma Task Force to engaging relevant Commission services, including on the effective use of EU funds. The Commission's 2024 implementation report also identifies a dedicated funding subgroup within its Roma Inter-service Group. These mechanisms should ensure operational cooperation between DG JUST and the services responsible for the European Semester, European Child Guarantee, employment, education, housing, cohesion, health, environmental justice, energy, enlargement and EU funding.[128]

Effective coordination requires political leadership. Under the 2024–2029 Commission, Commissioner for Equality Hadja Lahbib has an explicit mandate to spearhead implementation of the EU Roma Strategic Framework, while Executive Vice-President Roxana Mînzatu oversees social rights and related priorities. Their engagement, alongside the Commission President and other relevant Commissioners, is essential to maintaining Roma equality as a political priority, securing commitments from Member States and addressing persistent antigypsyism, segregation and discrimination. This responsibility is particularly important in negotiations on the 2028–2034 Multiannual Financial Framework, where Roma equality must be reflected in funding priorities, safeguards and accountability mechanisms.[129]

126 European Commission, COM(2026) 602 final, section I.

127 European Commission, A Union of Equality: EU Roma Strategic Framework for Equality, Inclusion and Participation, COM(2020) 620 final, 7 October 2020, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0620; Council Recommendation of 12 March 2021 on Roma equality, inclusion and participation (2021/C 93/01), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32021H0319(01).

128 European Commission, COM(2020) 620 final, section on Commission action; European Commission, Report on the implementation of the national Roma strategic frameworks, COM(2024) 422 final, 25 September 2024, section 3, "EU Action", and footnote 72 (EU funding subgroup), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52024DC0422.

129 European Commission, President von der Leyen's mission letters to Hadja Lahbib and Roxana Mînzatu (2024), accessible via their official Commissioner profiles; European Parliament, Commitments made by Hadja Lahbib, PE 754.466,

The Commission's coordinating role must also ensure coherence between the EU and enlargement dimensions of the Framework, in cooperation with DG ENEST. The Commission's 2024 assessment recognised progress in national policy frameworks but identified continuing implementation gaps. Independent civil society monitoring provides an additional perspective on whether these commitments translate into effective governance and accountability.

15.2. Civil society assessment of governance and implementation

ERGO Network's 2026 civil society survey examined the relationship between targeted and mainstream measures, public evaluation and transparency, and the mandates, resources and funding-coordination roles of national Roma contact points.

EU Member States

Mainstreaming and targeted measures. None of the 35 respondents considered the combination of targeted and mainstream measures adequate; 20 assessed it as partial, 11 as inadequate, one did not know and three selected other responses. This suggests that targeted measures are not consistently accompanied by institutional responsibilities across mainstream public services.

Evaluation and transparency. Eleven respondents reported a formal evaluation with publicly available findings, six reported an evaluation without published findings, 11 reported no evaluation and seven did not know. Only 11 of 35 respondents therefore unequivocally confirmed a publicly accessible evaluation, raising concerns about transparency and follow-up.

NRCP capacity. Only two respondents considered NRCP mandates, staffing and resources adequate; ten assessed them as partially adequate, 17 as inadequate, one did not know and five selected other responses. These assessments indicate a substantial perceived gap between coordination responsibilities and institutional capacity.

Funding coordination and monitoring. Two respondents reported effective NRCP involvement, 14 partial involvement, nine no involvement, four did not know and six selected other responses. This suggests limited influence over funding decisions and monitoring arrangements.

The Commission's 2024 implementation report identified NRCP participation as full members of EU co-funded programme monitoring committees in 12 Member States: Bulgaria, Czechia, Germany, Greece, Spain, Finland, Croatia, Hungary, Italy, Portugal, Slovenia and Slovakia. While this provides an institutional entry point, membership alone does not demonstrate influence over allocations or outcomes.[130]

Enlargement countries

Mainstreaming and targeted measures. Of 16 respondents, one considered the combination adequate, ten assessed it as partial and five as inadequate, indicating similarly incomplete integration into mainstream policies.

Evaluation and transparency. Five respondents reported evaluations with publicly available findings, four evaluations without published findings, two no evaluation and five did not know. Limited visibility of evaluation processes remains an accountability concern.

NRCP capacity. No respondent considered NRCP mandates, staffing and resources fully adequate; eight assessed them as partially adequate, five as inadequate, one did not know and two selected other

January 2025, https://www.europarl.europa.eu/RegData/etudes/BRIE/2025/700896/IPOL_BRI(2025)700896_EN.pdf.

130 European Commission, Report on the implementation of the national Roma strategic frameworks, COM(2024) 422 final, 25 September 2024, section 1.1, "National Roma Contact Points", and footnote 19 (the 12 Member States), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52024DC0422.

responses.

Funding coordination and monitoring. Four respondents reported effective NRCP involvement, three partial involvement, five no involvement and four did not know, reflecting uneven institutional arrangements.

These findings underline the need to integrate Roma equality into accession-related reforms, national sectoral policies and EU pre-accession assistance, with effective coordination between national authorities, EU Delegations and relevant Commission services.

15.3. Comparative assessment and key conclusions

The findings reveal a common governance challenge: targeted Roma measures coexist with incomplete mainstreaming, while NRCPs are frequently perceived as lacking the resources or authority needed to coordinate implementation effectively. Four priorities emerge.

Institutional accountability. Mainstream ministries, managing authorities and local governments must assume direct responsibility for Roma equality through clear objectives, budgets and reporting obligations. NRCPs should coordinate implementation, not substitute for the responsibilities of sectoral institutions.

Operational coordination and political leadership. At national level, NRCPs need the authority to identify and escalate implementation failures. At EU level, the Commission's Roma Inter-service Group requires effective cross-DG cooperation, supported by political leadership capable of securing commitments from Member States and ensuring that Roma equality influences wider EU policies and funding decisions.

Transparent evaluation and meaningful participation. Monitoring must lead to published findings, institutional responses and corrective action. Roma civil society should participate throughout policy design, implementation and evaluation, with adequate support and demonstrable influence. In Belgium, Roma Civil Monitor documented limited Roma participation in consultations on the national framework during 2022–2024, illustrating the difference between formal consultation and meaningful involvement.[131]

Inclusion of enlargement countries in European-level governance. A further concern is the insufficient and inconsistent inclusion of enlargement countries and their Roma civil society organisations in EU-level consultations and monitoring. Although the EU Roma Strategic Framework extends its approach to enlargement countries, their perspectives are not consistently reflected in European-level policy discussions.

The division of responsibilities between DG JUST and DG ENEST should not result in fragmented monitoring or unequal participation. DG JUST's coordinating role should ensure that enlargement countries have meaningful opportunities to contribute to agenda-setting, assessments and follow-up, while recognising their distinct legal and institutional circumstances.

Ultimately, governance must be assessed not by the existence of strategies, coordinating bodies or consultation mechanisms, but by their capacity to deliver institutional action, accountability and measurable improvements in Roma equality, inclusion and participation.

131 Roma Civil Monitor, Civil society monitoring report on the implementation of the national strategic framework for Roma equality, inclusion, and participation in Belgium (2025), section 1.3, "Roma participation in implementation and monitoring", p. 12 (four meetings in 2022–2024; approximately 15% Roma participation), https://www.romacivilmonitoring.eu/wp-content/uploads/2025/06/RCM2-2024-C3-Belgium-FINAL-ISBN.pdf.

15.4. Recommendations

1. **Make mainstream institutions accountable for Roma equality.** Governments should assign explicit responsibilities, budgets, measurable objectives and reporting obligations to relevant ministries, managing authorities and local governments. Targeted Roma measures must complement effective inclusion in mainstream services.

2. **Strengthen NRCP authority and capacity.** Governments should provide NRCPs with adequate staffing, stable resources, clear cross-government mandates and direct access to senior decision-makers, including mechanisms to identify and escalate implementation failures.

3. **Institutionalise independent and transparent evaluations.** Governments should conduct regular evaluations of national Roma strategies, publish findings and formal responses, and implement time-bound corrective action plans subject to public scrutiny.

4. **Ensure meaningful NRCP involvement in funding decisions.** NRCPs should participate systematically in planning, monitoring and evaluating relevant national, EU and pre-accession funds, with access to information and opportunities to influence decisions, while managing authorities retain responsibility for expenditure and results.

5. **Guarantee meaningful Roma civil society participation.** Governments and EU institutions should ensure early, continuous and adequately funded participation of independent Roma-led organisations in policy design, implementation and evaluation, with transparent feedback on how their contributions influence decisions.

6. **Establish effective accountability mechanisms.** Monitoring findings should trigger institutional responses, parliamentary and independent scrutiny, corrective deadlines and publicly reported follow-up. Persistent failures should lead to appropriate policy, institutional or budgetary adjustments.

7. **Ensure high-level political leadership and operational coordination of the EU Roma Strategic Framework.** The European Commission should strengthen political ownership through the Commissioner responsible for Equality, relevant Executive Vice-Presidents and Commissioners, supported by the Commission President. DG JUST should reinforce the Roma Inter-service Group and its funding subgroup to ensure coordinated action across the European Semester, Child Guarantee, housing, cohesion, environmental justice, employment, health, enlargement and EU funding. Political leadership should secure stronger Member State commitments to combating antigypsyism, segregation and inequality, address persistent implementation failures and safeguard Roma equality as a visible, measurable and adequately supported priority in the 2028–2034 MFF.

8. **Ensure equitable inclusion of enlargement countries in EU-level Roma governance.** DG JUST, in cooperation with DG ENEST, should guarantee meaningful participation of enlargement countries and Roma civil society in the European Roma Platform, relevant NRCP exchanges, consultations and monitoring processes. Commission assessments should systematically address enlargement developments, incorporate independent civil society evidence and provide transparent follow-up, ensuring that institutional divisions do not weaken representation or accountability.

OVERALL COMPARATIVE ASSESSMENT AND POLICY CONCLUSIONS

The Commission's November 2026 assessment provides an important official point of comparison: although 10 of 16 EU-level indicators have improved since 2016, most 2030 objectives remain off track. Its acknowledgement of uneven local implementation, weak outcome monitoring and continuing segregation broadly corroborates the institutional challenges raised in ERGO's 2026 civil society monitoring. The assessments have different coverage and methodologies and should not be presented as directly interchangeable.

The 2026 civil society monitoring assessment reveals a persistent implementation deficit across the EU Roma Strategic Framework's objectives. The report draws on 51 responses from 35 countries—35 responses from 26 EU Member States and 16 from nine enlargement countries—complemented by institutional reporting and independent research. These are stakeholder assessments, not statistically representative measurements of national outcomes; nevertheless, their consistency across policy areas warrants a serious institutional response.

The gap between policy adoption and delivery is the report's central finding. In the EU sample, 34 of 35 respondents assessed national Roma frameworks as less than largely implemented; 22 reported little or no progress since 2021 and one reported regression. Enlargement respondents likewise predominantly described implementation as partial, limited or absent. The 2027 mid-term review must therefore examine not only whether commitments exist but whether the mechanisms introduced under the 2020 framework have remedied the shortcomings already identified in earlier evaluations.

Antigypsyism remains a structural obstacle rather than a discrete issue to be addressed through awareness campaigns alone. Across both samples, respondents reported weak implementation of anti-racism measures, persistent discrimination and hate speech, limited institutional accountability and barriers to redress. The continued existence of segregation in education and housing and discriminatory practices in public services demands enforcement, institutional reform and independent scrutiny, alongside recognition and prevention.

The social and economic findings reinforce this diagnosis. Poverty and exclusion, unequal access to education, employment, healthcare, adequate housing and essential services are mutually reinforcing. Targeted Roma programmes cannot compensate for mainstream systems that remain inaccessible or discriminatory. The report also identifies digital exclusion and environmental injustice as interconnected dimensions of unequal access and exposure to harm. Governments must therefore make sectoral ministries, managing authorities and local authorities responsible for Roma equality outcomes, rather than leaving implementation to national Roma contact points alone.

Roma children experience the cumulative effects of these inequalities. The survey indicates that measures addressing children and young people are widely considered inadequate or only partially adequate; complementary research highlights the importance of accessible preventive family support, effective implementation of the European Child Guarantee in EU Member States, corresponding child poverty measures in enlargement countries, and safeguards against unnecessary separation of children from their families. Material deprivation must not be treated as parental failure. Policy success should be judged by improved living conditions, protection of rights and family well-being, not merely by the existence of programmes.

Participation is another critical test of implementation. Formal consultation bodies and invitations to meetings do not demonstrate that Roma communities influence priorities, budgets or decisions. Independent Roma-led, grassroots, women's and youth organisations need early access to decision-making, sustainable resources, protection of civic space and clear feedback on how their contributions have been addressed. Roma culture, history, language and recognition—including remembrance and responses to historical injustice—are integral to equality and participation, not optional symbolic additions.

The report also identifies insufficient attention to intersecting inequalities affecting Roma women and girls; Roma children and young people; older Roma; Roma persons with disabilities; LGBTIQ+ Roma; mobile EU Roma; Roma migrants; returnees; and Roma who are stateless or at risk of statelessness. These groups must be visible in national policies and monitoring without treating their experiences as interchangeable or overlooking overlapping identities. Universal services and Roma-specific measures must be designed together, with accessible delivery, appropriate safeguards and the meaningful participation of the groups concerned. The survey assesses reported policy attention, not the prevalence of discrimination experienced by each group.

Weak monitoring, funding transparency and governance reinforce these shortcomings. Only three of 35 EU respondents and one of 16 enlargement respondents unequivocally considered national Roma funding clearly identifiable and traceable. In both samples, only two respondents confirmed measurable targets and indicators in use. Such responses do not establish the absence of national systems, but expose a credibility gap between administrative reporting and publicly verifiable results. Allocations, actual expenditure, delivery, outcomes and corrective decisions must be distinguishable and open to scrutiny.

EU Member States and enlargement countries share many implementation challenges but operate under different legal, institutional and financing arrangements. Enlargement countries must be assessed through coherent fundamental-rights, accession and pre-accession frameworks, without being excluded from European-level Roma policy dialogue. DG JUST, in cooperation with DG ENEST, should ensure that enlargement developments and Roma civil society perspectives are reflected systematically in monitoring, consultation and follow-up.

Responsibility is shared but not interchangeable. National governments must implement and enforce rights and policy commitments; the European Commission must use its coordination, monitoring, funding and EU-law enforcement responsibilities effectively. DG JUST's leadership of the Roma Framework should mobilise the relevant Commission services, while high-level political ownership ensures that Roma equality is integrated into the European Semester, social policy, cohesion, enlargement and the next Multiannual Financial Framework. The 2027 mid-term review should mark a transition from reporting activities to requiring corrective action against persistent failures.

The overarching conclusion is that the problem is no longer principally the absence of a European policy framework. It is the insufficient transformation of commitments into enforceable responsibilities, equitable public services, transparent financing, meaningful Roma influence and measurable change. The remaining years to 2030 must be treated as a period of delivery and accountability, not another cycle of declarations.

STRATEGIC RECOMMENDATIONS

1. Make the 2027 mid-term review a mechanism for corrective action.

The European Commission should use the 2027 mid-term review to assess progress towards the EU Roma Strategic Framework's objectives and 2030 targets, as well as the effectiveness of national implementation arrangements. The review should explicitly examine whether the structural and institutional weaknesses identified in the 2017 and 2018 evaluations have been addressed, drawing on the Commission's 2024 and 2026 implementation reports, FRA data and independent Roma civil society evidence. It should identify persistent implementation failures, establish clear institutional responsibilities and corrective measures with deadlines, and introduce a transparent mechanism for monitoring and publicly reporting on follow-up action.

2. Enforce equality obligations and address structural antigypsyism.

Member States and enlargement-country governments should identify and correct discriminatory institutional practices, enforce desegregation and equal-treatment obligations, strengthen independent equality bodies and accessible remedies, and ensure accountability for discrimination by public authorities. The Commission should use its EU-law monitoring and enforcement powers where applicable and justified, rather than relying exclusively on voluntary coordination.

3. Assign implementation duties to mainstream institutions.

Governments should give ministries, regional and local authorities and managing authorities explicit Roma equality objectives, budgets, implementation duties and reporting obligations across education, employment, health, housing, social protection, digital access and environmental policy. National Roma contact points must have the mandate, resources and senior-level access to coordinate and escalate failures, without replacing sectoral responsibility.

4. Integrate Roma equality into mainstream EU economic and social governance.

The Commission and Member States should connect national Roma commitments with the European Semester, the European Pillar of Social Rights, the EU Anti-Poverty Strategy and the European Child Guarantee. Where evidence supports intervention, country reporting, reform priorities and funding decisions should address segregation, discrimination, administrative exclusion and unequal access to services, with measurable follow-up.

5. Protect Roma children and prevent unnecessary family separation.

Governments should fund early, coordinated and accessible family support, adequate housing, income protection, nutrition, healthcare and inclusive education. Poverty or inadequate housing alone must never justify removal from parental care. Child protection systems must apply individualised, non-discriminatory assessments, legal safeguards, independent review, family-based care and safe reunification where appropriate.

6. Guarantee Roma civil society influence and safeguard civic space.

The Commission and national authorities should institutionalise early, continuous and adequately resourced participation by independent Roma-led organisations, including grassroots, women's and youth organisations, in policy design, funding, implementation and evaluation. Authorities should publish responses to civil society input, demonstrate its influence on decisions and protect organisations from intimidation, discriminatory exclusion and arbitrary funding practices.

7. Make the 2028–2034 EU budget accountable for Roma equality.

EU and national funding arrangements, including pre-accession assistance, should make Roma equality and antigypsyism visible in relevant objectives, enabling conditions, programming and performance monitoring. The Commission and Member States should ensure that mainstream and targeted funding can be traced from allocation through expenditure to results, and that funding reaches community-led organisations. The next MFF should not weaken safeguards, social inclusion commitments or independent monitoring.

8. Establish transparent, rights-compliant monitoring and public accountability.

National authorities should set baselines, time-bound targets and outcome indicators aligned where appropriate with the FRA-coordinated portfolio. They should publish comparable information on allocations, expenditure, implementation and outcomes; commission independent evaluations; and respond publicly to findings with corrective measures. Equality data must be collected and used with lawful safeguards, protection against misuse and meaningful Roma participation.

9. Address intersectional inequalities and recognise Roma identity and history.

National measures should explicitly recognise and address the distinct and intersecting barriers faced by Roma women and girls, Roma children and young people, older Roma, Roma persons with disabilities, LGBTIQ+ Roma, mobile EU Roma, Roma migrants, returnees, and Roma who are stateless or at risk of statelessness. Governments should develop accessible, adequately funded and monitored measures with the meaningful participation and leadership of the groups concerned, while protecting privacy, safety and freedom from discrimination. EU and national institutions should also support Romani language, culture, historical recognition, remembrance and truth and reconciliation as integral dimensions of Roma equality and identity.

10. Strengthen Commission-wide leadership and DG JUST coordination.

The Commissioner responsible for Equality and relevant senior Commission leadership should ensure that DG JUST's coordination of the EU Roma Framework is backed by effective action across the Roma Inter-service Group and its funding subgroup. DG JUST should work systematically with the services responsible for social rights, employment, education, cohesion, housing, health, justice, environment, energy, the European Semester and enlargement, and report on joint action and unresolved implementation barriers.

11. Integrate enlargement countries fully into Roma policy governance.

DG JUST and DG ENEST should coordinate monitoring, dialogue and follow-up concerning Roma equality in enlargement countries, reflecting their distinct legal status and financing instruments. Enlargement governments and independent Roma civil society should participate meaningfully in relevant European Roma Platform discussions, exchanges and assessments; pre-accession support should be linked to transparent fundamental-rights outcomes and national accountability. The Commission, through DG ENEST in coordination with DG JUST, should support independent assessment of the Western Balkan governments' commitments under the 2019 Poznań Declaration, with meaningful participation by Roma civil society, including organisations in Kosovo*. Progress on Roma equality should be evaluated alongside accession reforms rather than inferred from the advancement of negotiations.

12. Require consequences and follow-up when progress stalls.

Governments and EU institutions should ensure that repeated findings of segregation, discrimination, non-delivery or opaque spending trigger proportionate institutional responses: revised measures, targeted technical support, strengthened oversight, budgetary adjustments and, where applicable, legal enforcement. Public reporting should show not only what was promised or funded, but what changed for Roma people.



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