Understanding the interaction between the European Commission and the National Roma Contact Points in reporting the implementation of National Roma Integration Strategies in 2012-2020

Atanas Stoyanov

WHAT MAKES A MEASURE RELEVANT?

Brussels 2020
Abstract

The autumn of 2020 marks a new beginning for Roma inclusion in Europe. The second strategic document of the European Commission was published in October. This all happened at a very fast pace, and without much regard for the past. This study is an attempt to look back into the period 2012-2020.

In 2019, the European Commission published its latest progress report on the implementation of the 2012-2020 National Roma Integration Strategies: the most advanced policy tools document for its time towards achieving equity between Roma and non-Roma in Europe. While structures such as a Roma Coordination Team within DG Justice, National Roma Contact Points, and Roma Civil Monitor were set in place, questions are arising about the measures reported as relevant to Roma policies. Member States reported measures relevant to Roma Inclusion. Civil Society Monitor project produced reports on measures relevant to Roma inclusion. Simultaneously, few to none of the national member states' reports were made public. The making of the European Roma Inclusion remains a secret recipe. What were the procedures behind collecting information for Roma inclusion progress reports in the 2012-2020 period? This research attempts to answer the question “What makes a measure relevant?” in the context of Roma policies. Who decides on Roma policies and how? What are the procedures developed to determine the relevance of particular measures to Roma? We hope that the research results benefit policymakers and civil society in achieving a better dialogue on the relevance of Roma-related policy measures in the 2021-2027 policy cycle and in the new window of European Roma Inclusion 2020-2030.

Keywords: relevance, policy measures, National Roma Integration Strategies

Acknowledgments

This study is an attempt to look at the recent past and future of European Roma policies.

It would not have been possible without the help of all those who agreed to talk to me honestly and frankly: representatives of civil society, National Roma Contact Points, representatives of the European Commission and the EU Agency for Fundamental Rights; thank you for being my interlocutors! Your willingness for an open dialogue was a sign that we all want a better future for Roma communities.

I would like to thank the Romani Studies Program of the Central European University for supporting me and to especially thank Dr. Marton Rovid for his unconditional support and guidance in the research process. Thank you, Marton! Without your prompting, this study would not have been finished.

Special thanks to Dr. Margareta Matache from the Harvard School of Public Health for editing this work, and to Lois Brookes Jones and Kieran Doyle for their proof-reading and comments. Thank you! You helped this work enormously!

Last but not least, thanks to Stanimir Chalakov and everyone else who took care of the visual part of my work. Thank you!

I hope that this study will provoke a debate on the changes we all need in terms of Roma inclusion in Europe.
### Abbreviations

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<th>Abbreviation</th>
<th>Full Form</th>
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<tr>
<td>CSR</td>
<td>Country-Specific Recommendation</td>
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<td>DG</td>
<td>Directorate-General</td>
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<td>EC</td>
<td>European Commission</td>
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<td>EP</td>
<td>European Parliament</td>
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<td>ESF</td>
<td>European Social Fund</td>
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<td>ERDF</td>
<td>European Regional Development Fund</td>
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<td>FRA</td>
<td>Fundamental Rights Agency</td>
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<td>MFF</td>
<td>Multi Financial Framework</td>
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<td>MS</td>
<td>Member State</td>
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<td>NRIS</td>
<td>National Roma Integration Strategy</td>
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<td>NRCP</td>
<td>National Roma Contact Point</td>
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<td>OP</td>
<td>Operational Program</td>
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<td>RCM</td>
<td>Roma Civil Monitor</td>
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<td>SDG</td>
<td>Sustainable Development Goal</td>
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About the author

Atanas Stoyanov is a Romani born in Pleven, Bulgaria. A Teacher, Roma civil society activist and Policy Analyst, he holds a Master degree in Public Policy from the Central European University, Budapest. Atanas has a rich experience in working for Roma non-governmental organisations all over Europe. Some of his workplaces are Centre for Interethnic Dialogue and Tolerance Amalipe, Arete Youth Foundation, the European Roma Grassroots Organisations Network and the Phiren Amenca International Network, where he currently holds the position of a Brussels-based Advocacy Manager. In the period 2011-2015 Atanas is a Municipal Councilor in Strazhitsa, Bulgaria where he is the Chairperson of the ‘Minority Integration Committee’. In 2017, he works for the Gwent Ethnic Minority Education Service of the Newport City Council, Wales where he supports the learning of over 200 Roma pupils. Atanas is involved in the implementation of a number of European-wide Roma Youth initiatives such as the Roma Genocide Remembrance Initiative, the European Youth Event and the So Keres Evropa Roma Youth Summit. His professional interest is to better analyse national and European policies targeting Roma.

With this regard, he has published a number of papers, some of which are ‘Framing of “Roma” in the National Roma Integration Strategy of Bulgaria’, ‘The political participation of Roma in Bulgaria’ and ‘Representation of Roma in School Textbooks’ (for Bulgaria), available online at his personal blog: https://raklata.wordpress.com
Introduction

Roma equal recognition and participation in society has been a struggle for centuries. In the past decades, together with the development of newly-born post-communist European democracies, we have witnessed the formation of Roma civil society organizations that began to cooperate, furthermore overcoming geographical distances and borders. Placing Roma into the agendas of intergovernmental organisations such as the Council of Europe and OSCE can be seen as a legacy of the establishment of the International Roma Union in 1978, which created a space for subsequent inclusion and dialogue surrounding Roma rights. Moreover, the efforts of Roma and pro-Roma activists for equal recognition and treatment of the Roma people, as the largest European ethnic minority, reached their highest peak in April 2011. The European Commission then issued a communication COM/2011/0173: “An EU Framework for National Roma Integration Strategies up to 2020”. “Roma people” turned into a subject of supra-national, synchronised, European efforts. Controversially, through European efforts in making Roma people equally seen and recognised subjects of society, the category of “Roma people” turned into an objective one. “Roma” became a policy-object, a ‘socio-economic category’ that needs to be “integrated” or “included” via policy measures and programmes.

Some of the structures to serve this Roma integration process have been developed and put in place even before 2011. Some member-states had developed their centralised institutions, as for example the National Agency for the Roma (Romania, 2004). Other states had placed Roma under bodies responsible for minorities in general, such as the National Council for Cooperation on Ethnic and Integrational Issues (Bulgaria, 2004). Many countries had already developed their own National Roma Integration Strategies before the call EC’s from 2011. These pre-2011 strategies were named differently, for example, the Bulgarian Framework for Full Integration of Roma in Bulgarian Society (1999), the Finnish National Policy on Roma (2009), the Czech Roma Integration Concept (2010), etc.

However, the late 2010/early 2011 wave of migration forced all member-states (except Malta) to adopt or revise and synchronise their existing Roma strategies for 2012-2020. In 2011, at the European level, under Commission Barroso II, a new structure was born within the DG Justice of the EC: the currently named “D.1 Non-discrimination and Roma Coordination” Unit. This Unit’s task has been to supervise the Member States in their implementation of the Roma strategies, require follow-up (reporting), and provide monitoring and feedback.

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10 Maltese government claimed that there are no Roma in Maltese territory.
Structures outside D.1 were also slowly set in place (and still are being set). As 27 Member States (including the UK and excluding Malta) have adopted Roma strategies, several public officials from these countries were given the task of contacting the European Commission regarding the implementation of the Roma strategies at the national level, i.e., becoming the so-called “National Roma Contact Points”\(^{11}\). The role of NRCPs is to collect information for the progress of Roma inclusion measures, often contacting other public officials from various state entities, and to present these national progress reports to the EC.

But what if governments were giving the wrong information or if the information provided by the state NRCPs wasn’t enough? At the very least, this was the concern of civil society. To equally involve civil society as a monitor to the national reports, the EC gave birth to the so-called Roma Civil Monitor as a pilot project\(^{12}\) run by pro-Roma and Roma organizations in 2017 (up to 2020): a coalition of civil society organizations that needs to parallelly report on Roma policies and realities at the national level.

And although structures for reporting Roma inclusion are set and to a certain extent developed (EC D.1, NRCPs, CSM, FRA), procedures on Roma inclusion reporting remain questionable and hidden from the public eye. As a requirement from the European Commission, the National Roma Contact Points must report “relevant” measures on the implementation of the National Roma Integration Strategies. To understand the implementation process of NRISs and the role of NRCPs, it is crucial to understand what a “relevant” measure means and implies. For instance, which policy measure count for Roma integration and which not; on what basis is this being decided and by whom?

More questions arise. Does the design of the measures relevant to Roma inclusion follow or not specific rules? Are there guidelines from the EC on what a relevance is? What is the Commission’s guidance on reporting of Roma-relevant measures? Furthermore, how all these entities interact in reporting Roma inclusion measures: what do they report and what not? And for what reasons?

Currently, civil society and a vast majority of policy makers lack a clear vision and information on what makes a policy measure Roma-relevant and consequently included in the reports of national governments on the implementation of NRISs.

At present, the DG Justice of the EC publishes the collected national reflections in the forms of summarised and comparative progress reports, mid-term reviews and communications which ‘show’ the progress on Roma inclusion to the general public. These brief summarised progress reports inform civil society, national governments, EU-policy makers and ordinary citizens about the state of Roma inclusion in Europe.

From one side, the published reports become a starting point for shaping future policies and deciding future priorities. From another side, as the report is summarized and comparative, it is turning into a peculiar sort of race: countries report numbers of measures to show the Commission their progress. The Commission, for its part, reports annually to the European Council and to the European Parliament. A country’s progress is being graphically shown as a low or high column in a chart, presenting the number of measures in various key areas (the main four being health, housing, education and employment).

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In these charts and tables cited in progress reports, the policy measures’ nature and content remains unwritten (what has been done). Still, one can only see in which area the measures are: education, employment etc. The budget for these measures is not mentioned either. What the public can see, however, is the “number of measures reported”.

In this research, as well as within the European Commission’s reports, the term “measure” refers to a policy or legislation on a national or local level, as well as to the efforts of NGOs and civil society organisations (projects and related to them conferences, activities, etc.)

The published report on the 6th September 2019 on National Roma Integration Strategies\textsuperscript{13} is the last report under the EU framework up to 2020 focusing on the implementation of Roma inclusion measures in the Member States. The report combines information from the National Roma Contact Points and the Civil Society Monitors. This report aims to inform the Council, the Member States, non-governmental organizations and, last but not least, ordinary citizens and the Roma themselves, of the progress made about Roma inclusion. It should be emphasized that this report is, above all, comparative in nature. It compares the Member States in terms of the measures they have reported as Roma-relevant. The report is not at all descriptive or telling of what has been done.

On the contrary, it is quantitative - trying to measure the progress of Roma integration according to several measures reported in several thematic areas (see figure 1). For example, Austria reported 36 measures in the field of education, while Hungary reported much less at 13. France – one single measure in the field of housing, while Slovakia 13. What does this tell us? Even if we compare these numbers, it is impossible to conclude who did what: what percentage of the measures has reached Roma population in the country; what is their budget; is it a long-term state program or just a short project of an NGO.

The so-called country-fiches (part 2/2 of the report) are a bit more verbose, but they also do not tell much about the nature of the measures applied and reported. There, one can read that Cyprus, for example, reported several schemes for people with disabilities and people with chronic diseases as relevant measures for Roma integration\textsuperscript{14}. Similarly, Estonia mentions the adoption of the Istanbul Convention as an essential and relevant for the Roma inclusion achievement\textsuperscript{15}.

The NRCPs have reported these measures as Roma-relevant, and the European Commission had nothing to say about it but published them in their last report. If one needs to look for Roma-relevance in these cases, there will be questions like: How many Roma live in Cyprus?; How many people with disabilities are there?; What is the share of Roma among the share of people with disabilities? Once we have the answers, then perhaps we can conclude that targeted policies and programs for people with disabilities are important and relevant to the Roma in Cyprus. But there is no trace in the report as to why this was reported.

Similarly, the country-fiche of Estonia mentions the Istanbul Convention as an achievement. Thus, one could, for example, ask ‘How many Roma women are there in Estonia and what is their percentage among the women experiencing domestic violence?’ The link is invisible to the reader, yet the European Commission has published it in its report.


WHAT MAKES A MEASURE RELEVANT?

Understanding the interaction between the European Commission and the National Roma Contact Points in reporting the implementation of National Roma Integration Strategies in 2012-2020

The goal of this research is to find out what are the procedures that help National Roma Contact Points to report a policy measure as Roma-relevant. The research attempts to analyse who decides and how on the Roma-relevance of the reported measures and better understand the interaction between the EC, NRCPs, and other involved actors in reporting Roma inclusion measures. Instead, the intent is to unpack the puzzle of Roma inclusion that has been put together so far, which remains unclear for a number of civil activists, public employees and Roma. This research also explains how and why we are where we are at the moment and whether some pieces cannot be rearranged in any other way.

To best tackle the research question, this qualitative research employs structured interviews and document analysis (EC communications, CSMs reports, mid-term progress reports). It consists of two main parts: a desktop-research and an interview-analysis part.

The desktop-research was carried out at the beginning of 2020. It covers several essential starting points that would further facilitate the readers’ understanding: basic normative documents, terms, and processes and the established Monitoring and Evaluation System for Roma Inclusion in 2012-2020.
This part of the research is based on several documents concerning Roma inclusion and related reports: communications and reports from the European Commission, conclusions and recommendations of the Council, motions for resolutions of the European Parliament, civil society reports and others.

Interviews were conducted in the second half of 2020 with staff of the Roma Coordination Team at D.1 DG Justice Unit, National Roma Contact Points, Civil Society Monitor experts, and FRA experts. The purpose of these interviews was to understand the interconnection and interaction between these different stakeholders in reporting on Roma inclusion. Besides, the interviews aimed, to check to what extent the institutions and networks under the European Commission are capacitated: whether training, funding, guidance (such as guidelines about what makes a measure Roma-relevant) are provided and understand the procedure of reporting of Roma Inclusion from national level towards the European Commission.

As National Contact Points and Civil Society Monitors are relatively new structures there is a lack of research on how they interact with each other and the European Commission. The data produced from this research is to inform the European Commission, National Roma Contact Points, and civil society on the process of measure-relevance and indicators-design. The study aims to provide valuable insights for civil society and European and national policy-makers on improving procedures for measure-design in the next EU window of Roma inclusion up to 2030.

Before the adoption of the EU Framework for NRIS 2011-2020

Before the 2011 adoption of the European Framework for National Roma Integration Strategies up to 2020, there had been already heated debates about Roma. Numerous injustices against local Roma across Europe had been in place before 2011: from school segregation to forced evictions and murders, the list of atrocities against European Roma had been lengthy.

When Bulgaria and Romania joined the EU in 2007, it has granted thousands of Roma free movement within the EU, which became a serious concern for several western European states. In France, from 2009 until August 2010, more than 18 000 Roma from Bulgaria and Romania were deported back to their countries by the French government, claiming that people were expelled on a legal rather than ethnic basis. The European Commission officially warned France about a potential infringement procedure, and it required an explanation from the French authorities.

Amid this and other similar tragic news, European media has increasingly targeted Roma and European politicians to debate on common European policy for Roma integration.

Perhaps very few remember today that the first attempt for a European Roma Strategy dates back to 2008, which was a failure. The years between 2008 and 2011 are significant for Roma policies at the European level, as we know them today. In 2008 the first European Roma Summit took place in Brussels under the joint patronage of the Commission President José Manuel Barroso and the French Presidency of the Council of the European Union.

18 In a debate between the Commission and the Council on 3 December 2008 the President-in-office of the Council Jean-Pierre Jouyet states that the French Presidency of the Council has drafted conclusions calling on the Commission and the Member States to take account of the situation of the Roma in the design and implementation of policies on the protection of fundamental rights, combating poverty and discrimination, gender equality and in those on access to education, housing, health care, jobs, law and culture. In these draft conclusions the Council calls for the Commission and the Member States to identify tangible actions for 2009 and 2010 - not for an EU Roma Strategy. The Commission in the face of the Employment Commissioner Vladimir Spidal takes a similar position: establishment of European Roma Platform for bilateral meetings at a high level, also differing from the request of the EP for an EU Roma Strategy. “Why did we all adopt this resolution in the plenary here in January?” rhetorically asked during the debate MEP Elly de Groen-Kouwenhoven.
It brought together more than 400 officials of the EU, representatives of national governments, and civil society. The aim of the summit was to identify policies for Roma inclusion that ‘work’ and the outcome of the debate to fuel further action at the EU level. Two other European Summits followed: in Cordoba, Spain (2010) and in Brussels (2014). These summits, above all, confirmed the political commitment of Member States on Roma Inclusion.

On 24 April 2009 in Prague, the Czech Republic, the first EU Roma platform took place. The EU Roma Platform involved officials from various national and EU institutions and civil society actors. The platform was a consultation process, not a European body. The first EU Roma platform was organised jointly by the European Commission and the Czech Presidency of the EU. Since then, EU Roma platforms have been organised annually, providing the officials of the Commission with a stage where they can openly discuss with civil society and other related actors. During the first EU Platform, the Czech Presidency advocates ten Principles, which had to be taken into account when drawing Roma inclusion policies. Roma inclusion. Principle No2: Explicit but not exclusive targeting became particularly popular. It implied focusing on Roma people as a target group but not to the exclusion of other people who share similar socio-economic circumstances.

On 7 September 2010, the European Commission establishes a Roma Taskforce. The Roma Taskforce was composed by senior officials from all relevant departments of the Commission: Justice, Employment, and Home affairs specifically mentioned. Its task was to assess the use of EU funds for Roma integration by Member States. There has been no publicly available information about the Roma Task Force and its mandate, how it operates, who is part of it, who assembles it. After 2010, the Roma Task Force has been sporadically mentioned across various documents and memos, yet it is difficult to determine whether it still exists today.

Later, on 19 October 2010, the European Commissioner for Justice, Fundamental Rights and Citizenship Viviane Reding issued a statement where she announced that the European Commission would withdraw the planned infringement procedure against France for evicting Roma and that “the Commission will present an EU Framework for National Roma Strategies next April”. At that moment, the political agreement on an EU Roma Strategy had already been concluded.

In February 2011, the Romani MEP Livia Jaroka made a second attempt to have an EU Roma Strategy. Being part of the EP Committee on Civil Liberties, Justice and Home Affairs, Jaroka was a rapporteur of an own-initiative report (INI), a procedure that allows the European Parliament to request the European Commission to put forward legislative proposals on certain issues.

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24 The third and last in the years up to mid-2020 European Roma Summit takes place on 4 April 2014 in Brussels. It focuses on making policies local. The EC presents its 2014 Communication on the implementation to the EU Framework of NRIs where besides looking at the main four thematic areas of education, employment, housing and healthcare it also adds to these ‘anti-discrimination’ and it examines funding and structural priorities to be considered.
30 ‘Own-Initiative Procedure (INI) - EU Monitor’, accessed 21 May 2020, [https://www.ewnmonitor.org/03530000/1/0/cvkl7m1c3gvxp/vhsak2045pvem](https://www.ewnmonitor.org/03530000/1/0/cvkl7m1c3gvxp/vhsak2045pvem).
The text\(^{28}\) was adopted by the plenary of the European Parliament in Strasbourg on the 9 March 2011. The European Parliament adopted a resolution on “EU Strategy for Roma Inclusion”: it calls on the Commission to propose and the Council to adopt an EU Strategy on Roma Inclusion.

On 5 April 2011, the European Commission issues its communication COM (2011)/173\(^{29}\) to the Council and the European Parliament for “An EU Framework for National Roma Integration Strategies up to 2020”. The text called on Member States to address the Roma needs with explicit measures and take a targeted approach. Following the path of the already in place intergovernmental initiative Decade for Roma Inclusion 2005-2015\(^{30}\), the Commission proposed EU Roma Integration Goals in four thematic areas: education, employment, healthcare and housing. Based on these goals, the EC invited the MSs to submit new or adapt their existing National Roma Integration Strategies and present it back to the Commission by December 2011. The Commission called that achievable national goals for Roma integration should be set and an adequate national and EU funding provided. The Commission also committed to report annually to the European Parliament and to the Council on progress on the integration of the Roma population in Member States and on the achievement of the goals.


EU Roma Inclusion between 2011-2019

The years after 2011 have been years of enhanced communication between the Roma Coordination Team of the European Commission with national governments and Roma civil society. What measures should be taken for Roma inclusion? Should they be mainstream or targeted? How governments and policies can decide who is Roma and who is not? Where to get the funding for measures for Roma inclusion? Which are the administrative structures related to Roma inclusion? How to report? All these require clarifications, and the Commission is committed to reporting to the European Parliament and to the Council on an annual basis up to 2020.

Between the adoption of the EU Framework of NRISs in 2011 and April 2012 the Commission diligently collected the so-called National Roma Integration Strategies from Member States (see Annex 1), noting a 3-month delay from the previously agreed. In these National Roma Strategies the Member States were asked to provide data about the overall vision/general context about the situation of the Roma in countries; statistics and definition about who is to be considered Roma; the situation of Roma and an action plan considering the four priority thematic areas: education, employment, housing and health; good practices that have been implemented, and very importantly how this strategy will be coordinated at national level and who will be in charge of the reporting to the European Commission – the so-called National Roma Contact Points (see Annex 2).

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From 2012 to 2019, the EC issued annually reports on the Implementation of the EU Framework with Communications to the EP and to the Council of the EU33, as described in figure 2:

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<th>Title</th>
<th>CODIFICATION</th>
<th>DATE</th>
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<td>5</td>
<td>Report on the implementation of the EU Framework for National Roma Integration Strategies 2015</td>
<td>COM(2015) 299</td>
<td>17.06.15</td>
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<tr>
<td>6</td>
<td>Assessing the implementation of the EU Framework for National Roma Integration Strategies and the Council Recommendation on effective Roma integration measures in the Member States - 2016</td>
<td>COM(2016)424, SWD/2016/0209</td>
<td>27.06.16</td>
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Figure 2: Communications of the European Commission to the Council and the European Parliament with regards to the implementation of the EU Framework for National Roma Integration Strategies.
Source: European Commission, DG Justice (2020)
Monitoring and Reporting of the EU Framework for NRISs 2012-2020

The 2011 EU Roma Framework had two major issues:

1. Good messages, but very broad without any indication of how to achieve results, e.g. ‘Cut the employment gap between Roma and the rest of the population’.

2. It states that the Commission will monitor the progress of the Member States, but nowhere does it say that the Member States must submit reports. The document requires that MSs must submit NRISs. The Council Recommendation from 2011 specifies neither a clear obligation for Member States to report to the EC, nor clear criteria for what exactly and how to monitor.

To improve this, in 2012 the Fundamental Rights Agency - FRA set up an Ad-hoc Working Group together with 10 MSs (BG, CZ, ES, FI, FR, IT, HU, RO, SK, UK) and representatives of the EC, UNDP and Eurofund to produce effective monitoring mechanisms to obtain reliable and comparable results: Working Party on Roma Indicators. The aim of this working party was to develop and agree on indicators that would measure the progress of the Member States in the various areas mentioned in the 2011 EU Framework.

In its 2013 Communication, the EC addressed these weaknesses. Based on that, on 9 December 2013, the Council adopted the Recommendation on effective Roma integration measures in the Member States (2013/C378/01), which imposed on Member States to ‘appropriately monitor and evaluate the effectiveness of their national strategies or integrated sets of policy measures within their broader social inclusion policies’ and to ‘communicate to the Commission any measures taken in accordance with this Recommendation by 1 January 2016’. The questions of ‘What should do the Member States do?’ and on ‘What to report?’ are much more specifically addressed here: there are mentioned substantive policy areas on education, employment, healthcare and housing. Additionally, anti-discrimination, protection of Roma children and women, poverty reduction through social investment and empowerment are mentioned as horizontal measures.

These 2013 Council Recommendations remain at the heart of what needs to be reported by the end of the 2020 period. The questions ‘What’ and ‘How’ to report, however, are still not resolved by the Member States at the national levels.

The 2015 report of the European Commission mentioned that the Working Party on Roma Integration Indicators coordinated by FRA had 17 Member States: AT, BE, BG, CZ, EL, ES, FI, FR, HR, HU, IE, IT, NL, PT, RO, SK, UK. The Working Party ‘has developed a reporting and indicator framework to measure progress on the implementation of measures under the Council Recommendation’ from 2013, and this reporting framework would be used by the NRCPs in the forthcoming reporting.

34 2013 Communication of the EC, p.3
35 “Despite clear efforts since the last report to put in place a robust monitoring and evaluation framework to systematically and consistently produce data (not necessarily using ethnic criteria) on the impact of Roma integration measures, this remains a challenge in most Member States. As highlighted by the working group on monitoring set up by the FRA, a monitoring system should be able to provide accurate feedback to governments at various levels on the one hand, on progress towards the goals in the national strategy and in the local action plans; and on the other hand, on improvements in the socio-economic situation of Roma and in their fundamental rights compared to the majority population (monitoring ‘the gap’). There is a great need to regularly compare data to rigorously evaluate the impact of the measures on the ground against the baseline. In particular, there is still a general lack of impact indicators. In addition, in most cases, the extent to which other stakeholders are involved in monitoring, evaluation and policy review, in line with the 10 Common Basic Principles for Roma Inclusion, is unclear. Possible synergies with existing EU policy indicators should be explored”. COM (2013), 454, p.8
36 Available at https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32013H1224%2801%29
A footnote in the text clarified that the indicator framework will take into account not only the measures in the Council Recommendation from 2013 but also other ‘mainstream measures with significant impact on Roma inclusion are reflected in the results. These included the commitments under the founding treaties - equality, fight against social exclusion and discrimination, the Charter of Fundamental Rights of the European Union and European antidiscrimination legislation, as well commitments in the fields of education, employment and the fight against poverty and social exclusion made under the European Semester of Europe 2020\(^{38}\). The document also recommended that National Roma Platforms are established to vitalise the process of Roma integration at local level.

The 2016 Communication\(^{39}\) on Roma of the EC reviewed for the first time the measures set in place against the Council Recommendation from 2013. The report informed that a detailed reporting template\(^{40}\) had been developed by the Working Group 17 to support MSs, following the structure of the Recommendation (2013), but that a Roma integration indicator framework linking measures with inputs and results still needed to be finalized (p.5). From the report it became clear that some Member States (FR, DE, SI) had opted for an alternative reporting. It was noticeable that France was part of the working group of 17, and at the same time, decided not to participate in this reporting model. Third countries did not submit reports at all (NL, LU, DK). Further in the report it was mentioned that the reporting template used for the 2016 Report had proven challenging for the Member States and that the European Commission was committed to the development of a more ‘user-friendly’ methodology of reporting. In addition to the information from the national contact points, a group of civil society organizations also provided information to the report. The Commission included in this report a Chapter ‘Examples of approaches’ where it describes measures in various areas: a mix of civil society projects funded by international donors or government, legislative and institutional changes, and some state-run programs.

**The reporting template of 2016 was divided into 2 columns:**

I. Key elements (on the left) and II. Commission’s assessment (on the right) and four main headings:

1. Horizontal Measures
   1.1. Fighting Discrimination and anti-Gypsyism, Protection of Roma children and women
   1.2. Poverty reduction
2. Policy areas
   2.1 Education
   2.2 Employment
   2.3 Healthcare
   2.4 Housing
3. Structural measures
   3.1 Cooperation and Cooperation (NRCP, civil and local actors, equality bodies, transnational cooperation)
   3.2 Monitoring
   3.3 Funding
4. Summary of Key Fundings

\(^{38}\) Ibid. Footnote 37  
\(^{40}\) SWD (2016) 209, 27 June 2016
Another novelty for the 2016 report was the specific naming of anti-Gypsyism as a horizontal problem, referring to the resolution approved by the European Parliament in 2015.41

In December 2016, the Council adopted Conclusions on Accelerating the Process of Roma Integration. It asked the Commission to carry out a mid-term evaluation of the EU Framework for National Roma Integration Strategies up to 2020 and to propose a post 2020 strategy on Roma integration (point 33). 2017 was a year of silence both on the reporting template and the indicators mentioned in 2016. Instead, the European Commission presented some summarised progress consulted by NRCPs, yet most of the information from the previous years - up to 2016 was missing. Instead, it presented something totally different: a comparison between two surveys produced by FRA in 2011 and 2016 excluding 18 MSs and covering only 9MSs (BG, CZ, EL, ES, HR, HU, PT, RO, SK), with Croatia covered partially. The document named ‘Roma Integration Indicators Scoreboard’ was attached to the 2017 Communication. It is a compilation of tables presenting with arrows the improvement, deterioration or status-quo of 18 indicators about the four main topics: education, housing, employment, and health and adding poverty to the list. The relation of these indicators to the measures set in the 2013 Council Recommendations was not explained. Information about the size of the survey sample was not provided in the Communication. It was not clear how the values presented at the table were reached either.

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<th>Roma integration indicators scoreboard 2011-2016 - HEALTH</th>
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Legend:
1. Share of people assessing their health in general as ‘Very good’ or ‘Good’, respondents, 16(+)%
2. Share of people with medical insurance coverage, respondents, 16(+)%;

*Note: Share of Roma, aged 16 years or older, who indicate that they are covered by national basic health insurance and/or additional insurance

Figure 3: Roma Integration Indicators Scoreboard,

45 Croatia joins the EU in 2013
46 SWD (2017) 286
In December 2018, the EC published another Communication on the NRISs called “Report on the evaluation of the EU Framework for National Roma Integration Strategies up to 2020”\(^{48}\). The document evaluated the EU Framework for NRISs against the criteria of relevance, effectiveness, coherence, efficiency and EU added value without a single pointing at Roma measures implemented nationally. The accompanying the 2018 Staff-Working Document\(^{49}\) was rich of valuable and relevant information: how much funding was allocated for Roma integration by country, comparison between the 2011 Commission and 2013 Council goals and measures, cost-benefit analyses, and others. The 2018 Staff Working Document informed that since 2015 the annual reporting of the MSs on the NRISs was carried via Online Roma Integration Reporting Tool that included a description of targeted and mainstream policy measures implemented across 12 thematic areas in total and attempted to gather data on funding and beneficiaries. In 2016, the tool was renewed. The Staff Working Document from 2018 also addressed weaknesses of the Online Reporting Tool.

In September 2019, the EC published a communication for the period 2012-2020: Report on the implementation of the National Roma Strategies\(^{50}\). The overview summarised ‘information provided by the NRCPs from 23 EU Member States through the Roma Integration Measures Reporting Tool developed by the European Commission and the FRA’ (p.1). It stated that the information provided in the reporting was for 2017 and was submitted to the EC in 2018, while published in 2019.

In principle, all this reporting should be clear and transparent. But the reader sees that this is not the case. Reading through the pages of the European Commission’s reports today, after the period of Roma inclusion by 2020 is over, it is still unclear whether there has been any reporting. How often have Member States reported and where? Is the system of indicators discussed in 2016 completed or is it still a work in progress?

Based on the information provided by the EC in its annual communications we can draw the following timeline:

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\(^{50}\) Available at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A5:2019SC0320#footnoteref2>
Understanding the Reporting on Roma towards the EC in 2012-2020 (Analysis)

To answer the research question of this study: ‘What makes a measure Roma-relevant?’ the current analysis is based on 13 structured interviews conducted online in May-July 2020 with stakeholders who were primarily involved in the reporting of the National Roma Integration Strategies, namely:

- a representative of the Roma Coordination Team at the DG Justice, EC;
- five National Roma Contact Points;
- five experts who took part in the Civil Society Monitor;
- a coordinator of the Roma Civil Monitor project
- an expert from the EU Fundamental Rights Agency (See questionnaires as Annex 3).

The main idea is to establish in detail how the implementation of National Roma Strategies was reported to the European Commission in the 2012-2020 period.

Certainly, it was unachievable for this study to cover all 27 Member States that report on Roma inclusion to the EC. Asking 27 National Roma Contact Points about their interaction with the European Commission, on the other hand, would mean getting the same or almost the same answers to the questions given. Therefore, this study is limited to five countries being selected on the following principle: two countries with a high percentage of Roma (Bulgaria and Romania) and three countries selected on a geographical principle: Finland (north), Greece (south) and the Netherlands (west).

To have a clearer and more comprehensive picture of the processes in these five countries, the Roma Civil Monitor experts interviewed are also from the same five countries.

The analysis is divided into three main parts:
1. The Roma Civil Society Perspective
2. The National Roma Contact Points Perspective
3. The FRA and the European Commission Perspective

The Roma Civil Society - Roma Civil Monitor Perspective Prior to 2017

From the moment of adoption of the European Framework for National Roma Integration Strategies in 2011 to 2017, it is difficult to indicate exactly how civil society participates and contributes to the monitoring of the implementation of National Roma Strategies. It’s also challenging to show how this feedback finds its way to the European Commission, given that the reports of the Member States to the EC are not available to civil society and to public. Although there is some consultation with civic Roma organizations (European Roma Platforms, EU Roma Week, e-mails) and some feedback is collected, it can be argued whether this feedback has anything to do with the reports of the National Roma Contact Points.
WHAT MAKES A MEASURE RELEVANT?

Understanding the interaction between the European Commission and the National Roma Contact Points in reporting the implementation of National Roma Integration Strategies in 2012-2020

Feedback?
Sometimes.
But on what?

This is also reflected in the respondents’ answers:

“Prior to the Civil Roma Monitor the EC was receiving a structured feedback from NRCPs and from the civil society they were receiving chaotic feedback.”

Civil Roma Monitor Expert

The Roma Civil Monitor 2017-2020

The EC is also aware of the urgent need for a detailed, wide-ranging feedback from civil society, and it is making an attempt to have it in a structured manner, albeit very slowly. The idea for the Roma Civil Monitor dates back to 2015 while the first reports of the monitor became available in early 2018.

“Before Roma Civil Monitor the EC was receiving a structured feedback from NRCPs and from civil society they were receiving a chaotic feedback, without it to be structured into topics etc. The first years we were literally sending – those who were willing – pdf-files with concepts about what’s going on the ground. In 2014, the EC made a template and asked civil society organisations to send such a feedback with determined topics. But again, organisations could decide to follow or not this template, the process was not structured, and there was no guarantee that the civil society feedback would be taken into consideration. Of course, all of this we did absolutely voluntarily – just for the moral satisfaction that our feedback might be taken into account”. Civil Roma Monitor Expert

What was the project about?
The Roma Civil Monitor (RCM) 2017-2020 was a pilot project of the DG Justice of the EC named “Capacity-building for Roma civil society and strengthening its involvement in the monitoring of National Roma Integration Strategies”51. As its title suggests, the project aimed at two directions: to produce independent civil society monitors and to capacitate civil society organisations to be able to conduct and write such monitoring reports.

The goal of the RCM, as stated in its guidance documents, was to ‘provide alternative information and assessment to governmental reports by an independent analysis of the current situation and recent changes, rather than by a review of governmental reports”52. It must be noted that even if civil society wanted to see the governmental reports towards the EC, they were not available to them. Civil society experts literally had no choice but to base their reports on interviews and their own research.

The main suggested methods for collecting information for the reports were analysis on ‘any legislation, policy, programme with significant impact on Roma (either formally part of the National Roma Integration Strategies or not); analysis of existing data such census or large-scale surveys, interviews with stakeholders such as policy makers, NRCPs, equality body; interviews with service providers (school directors, employment officers, general practitioners) and with civil society.

51 Ibid 12
The main target audience of these reports were defined as ‘persons who can directly or indirectly improve planning and implementation of National Roma Integration Strategies and the EU framework’.33.

The project was coordinated by the Center for Policy Studies at the Central European University in partnership with a few leading European Roma organisations: the European Roma Grassroots Organisations Network (ERGO Network), the European Roma Rights Centre (ERRC), the Fundación Secretariado Gitano (FSG) and the Roma Education Fund (REF). The idea of the project was to select and train representatives of civil society organisations or coalitions of organisations from all the Member States where there is a NRIS and to produce three reports per each country focusing on different issues.34.

The main topics included in the first two years of the RCM coincided or overlapped, to a greater extent, with the topics reported to the EC by the NRCPs. The 2019 Communication of the EC already clearly shows this implicit connection: the country-fiches of the Member States are followed by country-fiches produced by the RCM covering the main thematic areas and suggesting to MSs what should be improved.35.

The RCM as a process

For each of the reports that civil society produced under RCM, civil society experts went through a specially dedicated training with detailed guidance and methodology. In the first year of implementation, there were eight decentralised trainings. Later the design of these trainings was changed: it was made for a more extended period and centralised for all the NGOs with 1-2 representatives per country only.

“The driving force for all those adjustments in the project design was to answer the high expectations of the European Commission. It was not easy to work with grassroots NGOs to build their capacities. The EC wanted to have a strong say on what NGOs will be selected. Originally, we published calls for proposals in each country, and in many countries, NGOs applied. Again, there was a deliberation process between us and the EC, and it was in our favour: any NGO that met the criteria would join the process: Roma, pro-Roma. Then we wanted them to form a coalition and work together. In many cases, it showed complicated. In some cases, even conflicting.” Civil Roma Monitor Project Leader.

All surveyed representatives of the civil society who took part in the Roma Civil Monitor project share their difficulties. Firstly, they faced a difficulty to achieve conciliation and to work in a coalition with organizations which initially had competed with each other. Secondly, not every organization had the experience and expertise in writing a detailed report on the above topics. Thirdly, during the first two years of the project, the civil society representatives were very much restricted on the topics and format of writing.

33 EC.
34 The first cycle of reports is focusing on structural and horizontal preconditions for successful implementation of the strategy: Governance; Anti-Discrimination; Addressing Anti-Gypsyism; Impact of Mainstream Education Policies on Roma; the second cycle of reports is focusing on the progress made in the four key policy areas: Employment; Housing; Education and Healthcare; the third and last cycle of reports is on identifying blind spots in Roma inclusion policy, i.e. the organisations could choose on their own what topics should be addressed.
‘In our country, two coalitions of organisations applied for the Roma Civil Monitor. The Project Coordinators approached us back suggesting that we do it together. On the one hand we were supposed to do proper monitoring. On the other hand, we were supposed to know how to do it, and many organisations did not know how to write such reports. None of the organisations in the coalition wanted to lead the process. They wanted a good product from unskilled workers’ Civil Roma Monitor Expert

“The EC gave stringent norms and guidelines to the CEU which we had to follow: and that was where we had the conflict. It was structured and determined beforehand – the topics and everything you could bring to the table. For example, Antigypsyism! We never talk about antigypsyism in my country, and then we just had to put something there even though we don’t use that term at all, so it didn’t fit our country context at all’ Civil Roma Monitor Expert

‘The first two years, the format was rigorous. There were page limits, for example – 10 pages per chapter, not more, and we had to limit ourselves’ Civil Roma Monitor Expert

Last comes the difficulty to find government officials that are cooperative.

In one of the research-countries the NRCP refused to talk to the representative of the RCM. Not only that, but they warned other public officials not to give interviews and cooperate with the representative of the RCM, as this was a ‘private research’, and ‘public officials should not be involved’. The EC was informed, but officials couldn’t neither interfere nor disclose the report of this country for the purposes of their own research.

‘On the guidance who should be our target group, NRCP was on the list. The NRCP refused to talk to me. They warned the entire public administration not to talk to me’ Civil Monitor Expert

“In our country, two coalitions of organisations applied for the Roma Civil Monitor. The Project Coordinators approached us back suggesting that we do it together. On the one hand we were supposed to do proper monitoring. On the other hand, we were supposed to know how to do it, and many organisations did not know how to write such reports. None of the organisations in the coalition wanted to lead the process. They wanted a good product from unskilled workers.”

Civil Roma Monitor Expert

In another research-country the leading Roma civil society organisations have suspended for years all official contacts with the NRCP due to political and principle disagreements.

“All the civil society organisations who did the RCM left the Council Structure where the NRCP is based back in 2013. We have the view that there is needed a serious restructuring. Secondly, we could not be members of a Council headed by a nationalist politician’ Civil Monitor Expert

Besides the country civil monitors, the project hired 30 experts in different fields to support the civil society involved in the monitoring by providing feedback on their reports. Once the experts considered the reports ‘good to go’, the reports were sent to the EC, which had to provide comments on its side and which comments had to be readdressed by the civil society.

The fact that the Commission commented in detail on the independent monitoring reports commissioned before their publication can be interpreted in a contradictory manner. Did the Commission correct and/or just question what has been written?

It cannot be pointed for sure. Based on the conducted interviews, however, it is a fact that the Commission and the project leadership refused to publish an entire report of civil society in one of the countries because they found it inadequate. The report under question was subsequently submitted for writing to an independent researcher who ‘was not even from the country’ which the report concerned, shares a representative of the civil monitor experts.
On the other hand, the process of double feedback can be seen as a mutual learning process for all parties, which enables civil society on the grounds, experts in the various fields and EC officials to understand more deeply the different problems and specifics concerning Roma in different countries and to indeed capacitate civil society on how to conduct and write reports.

In some countries with a low Roma population where this monitoring process took place, there were not even developed Roma organizations and the process was led by non-Roma organizations, some of them addressing the topic of Roma for the first time. Such examples are Estonia, Latvia, Slovenia, and others. In other countries the Civil Roma Monitor found out there were even no Roma individuals to be interviewed. Such is the example of Luxembourg.

All of the interviewed experts of the RCM share that they received very detailed guidance and support in developing their monitor reports and that they had to follow a strict template. None of the interviewed representatives of civil society had access to the governmental reporting presented to the EC.

**What is a Roma measure for you? The perspective of civil society**

This question receives mixed answers from the civil society experts and this reveals to a large extent a lack of clarity on the matter.

For one of the respondents, ‘there are many measures and action plans that follow the EC’s guidance: healthcare, housing’ where the European Social Fund mostly provides the funding for them’. Yet, the respondent is categorical that the issues Roma face in his country differ strongly from the issues Roma people from other countries face. Due to the little number of Roma, there is no school segregation, and there are no housing issues.

For another respondent the only explicitly Roma-related measure found in the country is one that implicitly labels ‘Roma’ as a ‘Police-contingent’ - a project of the national Ministry of Justice.

A third opinion states that. ‘There are several measures under the Operational Program Human Resources Development. Although measures are not only for Roma but for social inclusion, Roma are clearly defined as one of the targets. The focus on Roma issues is clear but the programs are not entirely for Roma’. However, there are no clear financial allocations to the measures in the NRIS, but there are sporadic, opportunistic measures and funding for Roma ‘here and there’.

The fourth opinion from civil society states that these are programs connected to the Roma Community and other kinds of mediators and that currently, the municipalities and local parliaments are turning into the main obstacle for the realisation of Roma-directed measures.

Another respondent shares that there are no measures that explicitly target only Roma in his country, but in general, the measures are for ‘vulnerable minorities or groups’. The respondent shares that this even works better because many Roma prefer to self-identify as others. However, measures that target Roma are under the operational programs ‘Human Resources Development’, ‘Science and Education’ and ‘Regions in Growth’. ‘This is possible because Roma civil society is part of the steering committees of these operational programs’

**Why was all this reporting about?**

All in all, between 2017 and 2020, the Civil Roma Monitor Pilot Project produced 81 country reports covering 27 Member States (three per country), four synthesis reports, 12 thematic fiches, and 27 country fiches. It is safe to say that the number of civic monitoring reports produced during these three years exceeds all other reports of National Roma Contact Points and communications of the European Commission taken together.
The project capacitated several civil society organisations across the countries to better understand the Roma inclusion processes, create new networks, and share expertise.

For the first time, the cluster-differentiated approach towards the MSs was widely introduced with these reports, according to the Roma population. This allows for more specific and more tailored interventions for Roma in MSs in the future.

Another great quality of these reports is their transparency and accessibility. All the reports are available online for the usage of anyone interested in them.

And last but not least, the amount of the detail and country-specific information that these reports provide on structures and policies is incomparable, as there is no previous similar monitoring.

However, the great minus of this civil monitoring reporting is that it is not directly connected to the government reporting given to the EC. This reporting focuses on collecting information from the ground: on what Roma civil society thinks it is happening on the ground (outcome monitoring) while it is not directly assessing or questioning the governments’ administrative reporting. It is more answering the question “How do you feel?” rather than “What governments have reported, is that correct and how, do you feel about it?”.

**The big question remains: what happened to these reports after their publication?**

While the project announced in the very beginning that the reports were designed for the eyes of the relevant policy makers - governments, the managing authorities of the operational programs, the National Roma Contact Points, ministerial officials - it is not very clear whether any of these received the civil society reports after their publication. A big public event on the results and conclusions involving the relevant stakeholders did not happen. Even not online. How does the European Commission guarantee that all this reporting is enabling policy learning and policy development at national levels behind the act of just funding and publishing these reports up to date remains unclear. The major recommendations of the civil society are that the Roma Civil Monitor finds a continuation.

The **National Roma Contact Points Perspective**

Within this study, representatives of five National Roma Contact Points from five different countries were interviewed: Bulgaria, Romania, the Netherlands, Greece, and Finland. As one can imagine, these are countries with different numbers of Roma, with different administrative cultures, territorial divisions and levels of decentralisation, different ways of conducting policies, different financial resources, and different number of people involved in the reporting of Roma-relevant policies. These differences reflect the current status quo of Roma-related policies, their importance, and their reporting in individual countries. The information received under this study from the National Roma Contact Points is detailed and at the same time important. The NRCPs are the ones who feed the EU monitoring system.
This information concerns the following main areas:

- NRCP structure and position in the state hierarchy;
- collecting of information from the ground, availability of reports for the public, and coordination mechanisms;
- Funding for NRCPs and participation in EU Funds decision-making and Steering Committees;
- defining a Roma measure;
- who decides on the funding of Roma measures;
- communication with the EC, guidance for the NRCPs

To date, there is no extensive and accessible study on the capacity and structure of National Roma Contact Points, a study that focuses entirely on the national points, their place in state machinery, and the way Roma policies are coordinated (or not) by the NRCPs at the national level. In this respect, this study contributes significantly to the topic by providing structured and up-to-date information.

**NRCP structure and position in the state hierarchy. Collection of information from the ground. Coordination mechanisms**

The following tables illustrate the structures of the National Roma Contact Points in the different countries and the actors involved in gathering information, based on the answers given by the interviewed National Roma Contact Points.

<table>
<thead>
<tr>
<th>BULGARIA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Roma population (Council of Europe estimation, updated in July 2012): 750,000 (10.56%)</td>
</tr>
<tr>
<td><strong>Structure</strong></td>
</tr>
<tr>
<td>NRCP location</td>
</tr>
<tr>
<td>Administrative part of</td>
</tr>
<tr>
<td>Political Head</td>
</tr>
<tr>
<td>Type of structure</td>
</tr>
<tr>
<td>Number of staff</td>
</tr>
<tr>
<td>Roma people as staff</td>
</tr>
<tr>
<td>Website:</td>
</tr>
<tr>
<td>Territorial level of decentralisation</td>
</tr>
</tbody>
</table>
### National Roma Integration Strategy: adopted on 1 March 2012 up to 2020

#### Reporting

<table>
<thead>
<tr>
<th>National reports on the implementation of the NRIS available online</th>
<th>Yes, up to 2017 as written public pdf reports in Bulgarian; adopted annually by Council of Ministers and Parliament</th>
</tr>
</thead>
<tbody>
<tr>
<td>Usage of online tool for EU reporting</td>
<td>Yes, there is a national reporting tool named ‘The System’ (System for Monitoring and Control) which is decentralised and allows users at different levels of the public administration to feed it in. The data collected through the national reporting tool is being analysed by the Bulgarian Academy Science which compiles the national report and sends recommendations to various ministries what policies are working or not, what challenges need to be further addressed. Consequently, the information from the national report is being translated in English and filled-in within the EU online reporting tool.</td>
</tr>
<tr>
<td>People involved in data collection/feed data</td>
<td>over 35 people are involved into data collection and feeding in the reporting tool: experts from different ministries, regional educational and health inspectorates directors</td>
</tr>
<tr>
<td>Institutional coordination mechanism</td>
<td>yes, called ‘Coordination Mechanism’: involves officers from various ministries, regional inspectorates on education, and health, district experts on ethnic and integrational issues, Bulgarian Academy of Science, National Statistical Institute and others</td>
</tr>
<tr>
<td>Civil society coordination mechanism</td>
<td>39-40 civil society organisations are part of the National Council. The NRCP is cooperating with NGOs who are outside the National Council as well. National Roma platforms (3-4 times a year) were organised.</td>
</tr>
</tbody>
</table>

#### Decisions on EU funding measures at national level

| NRCP is part of the steering committee of the Operational Programmes | Yes, the NRCP and all the staff of the NCEII are part of the steering committees of all the operational programmes of the Republic of Bulgaria. They can vote, express opinion and propose measures for funding. |

#### Funding for NRCPs

| Is there a funding for the NRCP | Each year for NRCPs there is 65 000 euros provided by the DG Justice and now in the last two years – x 200 000 euros. This to be used for creation of dialogue horizontally and vertically between all stakeholders participating in the process of design of integrational measures and policies |

### ROMANIA

| Roma population (Council of Europe estimation, updated in July 2012): 1.850.000 (9,42%) |

#### Structure

<table>
<thead>
<tr>
<th>NRCP location</th>
<th>Ministry of EU Funds (not to confuse with National Agency for Roma-NAR which is a governmental agency responsible for the supervision of the national policies for Roma)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administrative part of</td>
<td>Ministry of EU Funds, Government of Romania</td>
</tr>
<tr>
<td>Political Head</td>
<td>Secretary of State (rang of a deputy minister)</td>
</tr>
<tr>
<td>Type of structure</td>
<td>An expert administrative cabinet that is solely responsible for communications with EU and other international bodies with regards to Roma</td>
</tr>
<tr>
<td>-----------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Number of staff</td>
<td>6 (1 full staff and 5 partially covering the topic)</td>
</tr>
<tr>
<td>Roma people as staff</td>
<td>None</td>
</tr>
<tr>
<td>Website:</td>
<td><a href="http://mfe.gov.ro/minister/politici-si-strategii/strategia-pentru-incluziunea-minoritatii-rome/?fbclid=IwAR2Jp42Ik7DDj81I-wAaMMZzf82hHxh3dSiVx1APdVXTbx1jT43TAQyGrZY">http://mfe.gov.ro/minister/politici-si-strategii/strategia-pentru-incluziunea-minoritatii-rome/?fbclid=IwAR2Jp42Ik7DDj81I-wAaMMZzf82hHxh3dSiVx1APdVXTbx1jT43TAQyGrZY</a></td>
</tr>
<tr>
<td>Territorial level of decentralisation</td>
<td>42 counties, in each a County Bureau for Roma with three people working to cover the local problems of Roma; Municipalities and village administrations can also decide to have experts on Roma</td>
</tr>
<tr>
<td><strong>National Roma Integration Strategy:</strong> revised multiple times – 2010, 2011, 2012, 2015, further revisions possible</td>
<td></td>
</tr>
<tr>
<td><strong>Reporting</strong></td>
<td></td>
</tr>
<tr>
<td>National reports on the implementation of the NRIS available online</td>
<td>No. At the website of the NRCP there are no available reports on the implementation of the NRIS measures for Roma but various policy documents. Similarly, at the website of the National Agency for Roma-NAR, responsible for the contact with local administration, implementation at local level and monitoring and reporting at national level there is only one document on the implementation of the strategy from 2017, disaggregated into information by districts, which information is rather qualitative than quantitative, while all other reports concern the annual activities of the NAR as an institution and do not explain how Roma benefited from measures at local level. Prefectures are obliged to provide reports to the NAR each three months.</td>
</tr>
<tr>
<td>Usage of online tool for EU reporting</td>
<td>Yes, all the members of the inter-ministerial committee have access to the EU online reporting tool. They can introduce data into the system. NRCP translates this information in English and sends it to the EC. The NAR is also providing information to the NRCP but this has to be validated by the NRCP.</td>
</tr>
<tr>
<td>People involved in data collection/feed data</td>
<td>More than 1600 people working directly or partially for Roma: administration of the NRCP and the National Agency for Roma, County Bureaus for Roma, Municipal and village experts in some places, sanitary and school mediators in some places, Teachers in Romani language in some places.</td>
</tr>
<tr>
<td>Institutional coordination mechanism</td>
<td>Roma County Bureaus, County directorates such as ‘County Directorate for Health’, ‘County Directorate for Education’ are feeding information to NAR to produce the national reporting. The NRCP has a ‘Inter-Ministerial Committee’ – composed of all the central institutions related to Roma: Ministry of Health, Development, Employment, Education, Interior, Culture. All these ministries are represented by a state secretary in this Committee which is led by the NRCP. The NRCP is cross-checking the information provided both from the NAR Consultative Committee and the Inter-Ministerial Committee to provide coherent information on what is happening on the ground.</td>
</tr>
<tr>
<td>Civil society coordination mechanism</td>
<td>NAR has a ‘Consultative Committee’ which includes representatives of 70 NGOs working all across Romania.</td>
</tr>
</tbody>
</table>
### Decisions on EU funding measures at national level

<table>
<thead>
<tr>
<th>NRCP is part of the steering committee of the Operational Programmes</th>
<th>NRCP partially, NAR not. NRCP takes part in producing the guidelines for the applicants. Any call that is open by any of the management authorities - Human Capital, Environment, Competitiveness etc. needs to verified by the NRCP to ensure there is no discrimination and there is equality of chances. The NRCP is part of the selection and evaluation on measures 4.1, 4.2, 5.1 – giving points for the degree of covering the programs for Roma community.</th>
</tr>
</thead>
</table>

### Funding for NRCPs

<table>
<thead>
<tr>
<th>Is there a funding for the NRCP</th>
<th>Yes. Two kinds of funding: 1) DG Justice provides grants covering expenses for developing National Roma Platforms. National Platforms get 60 000 euros. 2) Under Axis 7 Development Capacities, Operational Program Human Capital – NRCP is a preferential beneficiary.</th>
</tr>
</thead>
</table>

### GREECE

#### Roma population (Council of Europe estimation, updated in July 2012): 175.000 (1,63%)  
**Structure**  
| Administrative part of | Ministry of Labour and Social Affairs |
| Political Head | Minister of Labour and Social Affairs (Secretary General for Social Solidarity and Fight Against Poverty) |
| Type of structure | Administrative Directorate(-s) for combatting poverty, exclusion and social cohesion within the Greek Ministry of Labour and Social Affairs |
| Number of staff | 6 full-time public servants in the General Secretariat for Social Solidarity and Fight Against Poverty and 5 experts in Roma inclusion as external collaboratorse |
| Roma people as staff | Information not available |
| Website: | [https://egroma.gov.gr/](https://egroma.gov.gr/) |
| Territorial level of decentralisation | Information on local Roma experts in municipal administration is not available. There are 53 -60 Community Centres with Roma Departments to help Roma with social matters. |

#### National Roma Integration Strategy: adopted in December 2011 up to 2020  
**Reporting**  
| National reports on the implementation of the NRIS available online | Not found |
| Usage of online tool for EU reporting | Yes – based on information on Greece available in the 2019 Communication of the EC |
| People involved in data collection/ feed data | Information on who is involved in data collection to feed the report is not found. Based on territorial-mapping approach (identify in which municipalities Roma live) a number of Municipalities have submitted Local Plans for Roma Inclusion. |
| Institutional coordination mechanism | Established with no evident results. In 2016 a National Mechanism for the Monitoring and Evaluation of Social Inclusion and Social Cohesion Policies, Social Solidarity, Administration and Application Provisions was established by law and includes both the central Government (ministries, the National Centre for Social Solidarity, the Workforce Organisation, the National Social Protection Committee, National Contact Points and others) and local governments. The mechanism is coordinated by the Governmental Council on Social Policies (GCSP). So far, no evaluation reports or other outputs relevant for Roma inclusion produced by the National Mechanism (CRM 1, 2019, Greece) Besides that, there are Roma mediators across Greece whose connection to feeding the reporting tool is unclear. |
| Civil society coordination mechanism | There is little evidence for regular and structured dialogue with civil society. In 2017 the Greek NRCP was awarded a project by the DG Justice to organise National Roma Platform which to bring together civil society and state experts and municipal experts. Also, in 2017, an online consultation platform was launched in order for municipalities to provide data about the Greek Roma population, their living conditions, the planning and implementation of projects or interventions related to them and, in general, to update NRIS-related data and know-how. Individuals and organisations can use the online platform to provide a feedback. |

### Decisions on EU funding measures at national level

| NRCP is part of the steering committee of the Operational Programmes | Information is not provided. |

### Funding for NRCPs

| Is there a funding for the NRCP | Under the Rights, Equality Citizenship call for proposal restricted to NRCPs the Greek NRCP is funded in order to implement actions, training and consultation with the aim to promote and facilitate dialogue, mutual learning, cooperation, policy review between all national stakeholders. |

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### THE NETHERLANDS

| Roma population (Council of Europe estimation, updated in July 2012): 40,000 (0,23%) |

#### Structure

| NRCP location | Directorate for Society and Integration |
| Administrative part of | Ministry of Social Affairs and Employment |
| Political Head | Minister of Social Affairs and Employment |
| Type of structure | Administrative Directorate for dealing with issues related to diversity as a result of migration within the Dutch Ministry of Social Affairs and Employment |
| Number of staff | 1 part-time |
| Roma people as staff | None |
| Website: | No dedicated website or section available |
| Territorial level of decentralisation | In some municipalities with more numbers of Roma population there are appointed Roma contacts points within the municipalities, e.g. Lelystad and Utrecht. Yet no information for appointed Roma or Sinti on these positions. |
### National Roma Integration Strategy: adopted in December 2011

#### Reporting

| National reports on the implementation of the NRIS available online | Yes. The Dutch Government is using an external service – the Risbo Consultancy at the Erasmus University of Rotterdam to conduct a series of qualitative researches titled ‘Social Inclusion Monitor’ reporting on the education, social position, working situation, living conditions, health situation of Roma and Sinti living in the Netherlands before WWII, people living in caravans, Balkan Roma, General Pardoon (27 000 people who received a Dutch residence permit based on a general pardon in 2007) and New Roma (Bulgaria, Romania). This research is not on reporting policies but rather a qualitative reflection of the status quo of Roma communities. There are four Social Inclusion Monitor conducted in 2013, 2015, 2017 and 2019, The Social Inclusion Monitor Reports 3 and 4 are publicly available at the website of the Dutch Ministry of Social Affairs and Employment. |
| Usage of online tool for EU reporting | Yes – based on information on the Netherlands available in the 2019 Communication of the EC. |
| People involved in data collection/feed data | The research experts at RISBO Consultancy (none of them from Roma or Sinti origin) include in their interviews all groups of Roma and Sinti, and state representatives: police, child protection, social workers, school teachers and others. |
| Institutional coordination mechanism | There is no functional inter-ministerial coordination mechanism on the implementation of the national set of policies for Roma inclusion. Rather there are several programs where Roma could be or are addressed within the portfolios and budgets of various ministries. For example, Ministry of Health, Welfare and Sport has a ‘Sinti and Roma Restitution Fund’ for Holocaust Commemoration and Remembrance activities but also for Roma and Sinti emancipation and participation. Ministry of Security and Justice had a project about tackling Roma multi-problematic families within 9 municipalities involved where police were trained how to deal with Roma (contradictive narrative); Ministry of Education makes funds available for schools with large number of pupils of Sinti and Roma background and others. |
| Civil society coordination mechanism | ‘A flexible dialogue’ with civil society, initiated either by NRCP or a number of CSOs. There used to be the so-called Structured Dialogue with a number of CSOs. |

#### Decisions on EU funding measures at national level

| NRCP is part of the steering committee of the Operational Programmes | No information available. |

#### Funding for NRCPs

| Is there a funding for the NRCP | There is a possibility to apply for funding for the NRCP with the EC but the NRCP decided against that. |

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### FINLAND

#### Roma population (Council of Europe estimation, updated in July 2012): 11.000 (0,21%)
<table>
<thead>
<tr>
<th>Political Head</th>
<th>Ministry of Social Affairs and Health</th>
</tr>
</thead>
<tbody>
<tr>
<td>Type of structure</td>
<td>Quasi-governmental-civil society structure. The Advisory Board is appointed by the Government and half of its members are of Romani background, while the other half are ministry representatives. Usually, the Roma representatives in the Advisory Board come from various Roma organizations. The civil servant appointee of the National Roma Contact Point is part of coordinating the development of the relevant policies addressing the situation Roma, and is also a member of the Advisory Board on Romani Affairs. (CRM 1, Finland, 2018)</td>
</tr>
<tr>
<td>Number of staff</td>
<td>2 full-time</td>
</tr>
<tr>
<td>Roma people as staff</td>
<td>2</td>
</tr>
<tr>
<td>Website:</td>
<td><a href="https://romani.fi/en/front-page">https://romani.fi/en/front-page</a></td>
</tr>
<tr>
<td>Territorial level of decentralisation</td>
<td>There are currently four Regional Advisory Boards on Romani Affairs (the 5th is under preparation) which are placed under the existing six Regional State Administrative Agencies. They work as cross-administrative and cooperative bodies between administrative authorities and Roma in the local and regional level. There are also local working groups in around 20 municipalities. (CRM 1, Finland, 2018)</td>
</tr>
</tbody>
</table>


**Reporting**

| National reports on the implementation of the NRIS available online | No. The only available online report on implementation dates back to 2014. The publications on the website of the Romani Advisory Board concern studies about Roma in different fields: well-being, children rights, housing equality, etc. but a full annual report on the implemented under the NRIS measures is missing. |
| Usage of online tool for EU reporting | Finland has access to the EU online tool but it is difficult to state if it has used it so far. The 2019 EC Communication shows that Finland did not submit information to the EC in 2017. |
| People involved in data collection/feed data | No information available as it is not clear whether the EC online tool has been used. |
| Institutional coordination mechanism | The National Advisory Board on Romani Affairs and the 4 Regional Advisory Boards on Romani Affairs, as well as Local Roma Working groups (20 municipalities), Roma Education Team at the Finnish National agency for education and other structure provide a space for dialogue between state-representatives at all levels and Roma civil society and individuals. |
| Civil society coordination mechanism | Half of the members of the National and Regional Advisory Boards are representatives of the Romani CSOs. |

**Decisions on EU funding measures at national level**

| NRCP is part of the steering committee of the Operational Programmes | No information available. |

**Funding for NRCPs**

| Is there a funding for the NRCP | There is no separate funding for the NRCP |
It is clear from the answers that in each country the National Roma Contact Points are located in different places within the administrative hierarchy. This position is important insofar as it is a prerequisite for the establishment of a functioning coordination mechanism with other institutions that have a role in the implementation of Roma-related policies. When the National Roma Contact Point is located in the Council of Ministers, for example, the orders are signed by a (Deputy) Prime Minister and require all ministries to nominate a representative responsible for Roma policies. Then, it is much easier to actually establish a coordination mechanism and require all levels of government below to submit information and receive feedback. When the National Roma Contact Point is located in an administrative unit of a given ministry, it is much more difficult to issue an order to other colleagues from other ministries to deal with Roma issues, to nominate representatives responsible for these issues, to feed a system, and to receive a feedback. In such cases, National Roma Contact Points can only rely on collegiality, unless there is a clearly defined and established institutional coordination mechanism at the national level.

That is why the political will of the Member States, the understanding of individual governments, that funds must be set aside for human and financial resources, that this is in fact important, the political commitment on the issue, remain first of importance and above all else.

As can be seen from the answers given, the period 2012-2020 was not enough for some Member States to allocate human resources, to establish working coordination mechanisms or simply to understand what the European Commission requires. The fact that the Member States do not understand what is required from them can be judged by the fact that they did not use the online EU tool to report (Finland did not submit reporting in 2017), there is no transparency on the work of coordination mechanisms (Greece, the Netherlands), there are reports on the annual activities of the institutions but not on what measures have been implemented for Roma and what is their impact on Roma (Romania), there are survey-reports in various fields but not an annual reporting based on the implementation of the NRISs showing implementation of governmental measures (Finland, the Netherlands) and in some countries there is no visible reporting at all (Greece).

Besides the institutional coordination mechanism established in Member States, it is very important to analyse the extent to which civil society is consulted. As it can be seen in all the Member States there were established some kinds of consultation-mechanisms with civil society. In Bulgaria, these are organisations that are part of the National Council on Ethnic and Integrational Issues. Important to note here is that the largest Roma NGOs in Bulgaria have withdrawn their membership from the National Council due to disagreement with political leadership and other principal disagreement. In Romania, there are around 70 organisations that are in dialogue with the National Agency for Roma. In Finland, the Roma Advisory Board has more than 50 years of existence, and it a positive fact that there is a decentralisation of this advisory board at the regional level. In the Netherlands, there has been a structural dialogue with civil society which for some reasons turned into a flexible dialogue. Yet, this dialogue could be done in a more transparent way as there is no dedicated website for Roma inclusion, no minutes available, and no evidence accessible for wider public. In Greece, due to the political changes, the place of the NRCP is changing from a special secretary for Roma issues (2016) into a general secretary for combatting poverty (2019). The dialogue with civil society is being ensured via a website that is currently (2020) being built but besides a number of conferences, there is no evidence of a structured coordination mechanism with civil society.
What is a Roma measure for you? The understanding of the NRCPs

“The is no such thing as a Roma measure. Our policy is a mainstream policy. There are some specific measures for vulnerable groups.”

Bulgarian NRCP

This question aims to find out what National Roma Contact Points mean by ‘Roma-relevant measures’. This is important because these contact points are responsible for submitting reports to the European Commission with a ‘number of measures’ covering various related fields.

In Bulgaria, there are no officially-recognised minorities or minority rights. Therefore, there are no programs or measures specifically designed to address Roma issues; instead, mainstream policies and measures are crafted to focus on various vulnerable groups, including Roma.

“There is no such thing as a Roma measure in Bulgaria. Our policy is a mainstream policy: for the entire population. There are several measures for more vulnerable groups that need to be supported by more specific measures. We never had Roma measures, we never measured Roma measures. There are some ‘specific measures for vulnerable groups. All citizens of Bulgaria can benefit from all policies in all sectors of economy. Some groups however are more vulnerable, therefore there are these more ‘specific measures for vulnerable groups’” -Bulgarian NRCP

The National Roma Contact Point, along with a number of Roma NGOs, is part of the Steering Committees of the Operational Programs, where decisions are made on how EU funding should be spent at the national level. This means that both the NRCP and civil society can propose measures that implicitly target Roma. Several worthwhile policies exist already, particularly in the fields of education and human resources development.

In Romania, Roma are a recognised national minority. Affirmative measures in education have been in place since 1994. For instance, high schools and universities have a dedicated quota for Roma to compensate for historical marginalisation of Roma and their previously unequal access to education. When these measures were first introduced, the reaction among the general public was negative: the sentiment was accusatory, with a feeling that ‘Roma are taking someone else’s place’. However, affirmative measures added additional places to those that already existed; with time, these measures in education achieved widespread acceptance. The NRCP shared that in other policy areas, such as ‘Houses for Roma’, local authorities decided to apply, but only to build ghettos for Roma to keep them separated from majority. Funding also exists for efforts to fight territorial, historical and educational segregation thanks to the Community Led Local Development – CLLD programs.

‘I have an opinion: not all the Roma are poor and not all the poor are Roma. This is why, when we are talking about interventions about Roma, we are talking about communities where at least 10% of the population self-identify as Roma. At the same time, we cannot intervene only for Roma, but also for their neighbours who are living in the same conditions. We have to approach them in the very same way. We have these interventions for vulnerable, marginalised communities with Roma population, but ‘with Roma population’ means at least 10% declared to be Roma.’

- Romanian NRCP

All the funding for Roma is EU funding. And this is problematic. The problem is that the EU funding is very competitive: those who can write good-quality projects win. But the most deprived localities do not know how to write good projects. Because of that, rich municipalities become richer, and poor municipalities – poorer.’

- Romanian NRCP

“We have interventions for vulnerable, marginalised communities - when programmes are designed for ‘Roma Communities’, this means communities in which at least 10% of people self-identify as Roma.”

Romanian NRCP
In the Netherlands, several ministries have programs that consider Roma beneficiaries. Yet, there is no available reporting on the impact of these measures on Roma, Sinti, people who live in caravans, or other similar groups. ‘We are not reporting policies, we are reporting the education, social position, working situation, living conditions, health situation. And this research is based on interviews and it is not an instrument to evaluate policies. It is based on interviews’ - Dutch NRCP

According to the Finnish NRCP there are ‘Roma programs which are great tool to contribute both nationally and at the European level, to the wellbeing of Roma, economic and social affairs and the promotion of equality.’ As the number of Finnish Roma is comparatively low, one could assume that Roma programs should be easily accessed by Finnish Roma. Yet, this cannot be confirmed as the Finnish NRCP did not report to the EC in 2017.

In Greece there are community Roma community-specific mediators, yet the information on policies targeting Roma remains scarce. According to the Greek NRCP A Roma measure is a measure which aims to support Roma people to equally participate in social and economic life. As the majority of the Roma people in Greece are Greek citizens, a Roma measure could be a targeted action for Roma as vulnerable and/or marginalized group. It could also be a mainstream measure which also implicitly includes Roma people (for instance the minimum guarantee income for the people at-risk of poverty or the universal access to health care services, including the unemployed and underinsured vulnerable groups.)

“**A Roma measure is a measure which aims to support Roma people to equally participate in social and economic life.”**

Greek NRCP

**Asking NRCPs: Who decides on the funding of Roma measures in your country?**

The study also asked the NRCPs who is responsible for the decision to fund anything related to Roma, and where this funding comes from. In none of the countries is there a specific, dedicated budget set aside for the implementation of National Roma Strategies. If the National Roma Strategy has an attached Action Plan with a budget, it can be listed in there that funding for measures will come from the budgets of European funds and ministries.

In action plans for implementation of Roma strategies, there is no great detail on the amount or mentioning specifically which concrete (mainstream) programs will be focusing on Roma. At first, these budgets are not related whatsoever to the implementation of the NRISs. An analysis of budgets, programmes and action plans of ministries can prove that ‘Roma’ are either completely not mentioned or replaced by broader phrases such as ‘vulnerable groups’. Later, during reporting, NRCPs can decide to connect particular measures to the implementation of the NRISs. NRCPs can decide that certain policies that were adopted during a given time period were related to the NRISs, without necessarily having clear account of how many Roma were reached or why the reported measures are relevant to Roma.

“All the funding for Roma is EU funding. And this is problematic. The problem is that the EU funding is very competitive: those who can write good quality projects win. But the most unprivileged localities do not know how to write good projects. Because of that rich municipalities become richer, and poor municipalities - poorer”

Romanian NRCP
This precarious dynamic underscores the importance of having a coordinating institutional and civic mechanism, as the alternative involves NRCPs retroactively fitting institutions into their reporting, based on frequently insufficient measures and policies which are not holistic. When there are no functional institutional and civil society coordination mechanisms, judgment of what is Roma-relevant falls on the shoulders of the NRCP.

In Bulgaria and Romania, the funding for Roma-related measures and operations clearly comes from EU Funds. In the Bulgarian case, the NRCP is a part of all the steering committees of all operational programs, as is Roma civil society. This means that both NRCP and civil society can make decisions about what should be financed, for how much, who can apply, etc. In Romania, the NRCP has a say in evaluating all measures against the criteria of discrimination and equality, and is in the position to evaluate projects under several schemes concerning Roma.

In the Netherlands and Finland, the importance of the EU Funding is minor or absent, as both countries’ national budgets allow for national funding of Roma-related policy measures. Ministries cover programs, interventions, surveys and studies out of their individual budgets. Most of the Finnish civil society organisations apply for project funding from STEA – the Funding Centre for Social Welfare and Health Organisations, and rarely for European funding.

In Greece, according to the NRCP, the Central government determines priorities, estimated budget and funding sources (ESIF, state budget or other sources such as the EEA Grants). Following that, regional and local authorities decide whether they will make use of the funding, based on local needs, political willingness and administrative capacity.

The relationship between NRCPs and the EC: communication, guidance, training and funding

In response to the question ‘How often do you communicate with the EC?’ the NRCPs answer between 4-5 times a year. This communication includes written emails and instructions as well as four 2-day meetings held annually in Brussels, participation in the annual European Roma platforms and the development of national Roma platforms. In 2020, matters of discussion included Covid-19 and the development of the post-2020 Working Party of NRCPs, whose task was to develop and agree on an updated Set of Indicators for Monitoring the implementations of the NRISs and reporting in the 2021-2030 period.

To the question ‘What guidance does the EC provide on reporting of measures’ NRCPs reply that these are mainly written instructions. In the two most recent meetings with NRCPs, the EC provided support for the reporting of measures as well as the establishment of a Working Party to set indicators for the post-2020 period led by FRA.

‘These are standard indicators given by EC, elaborated with FRA. These indicators given by the EC are very summarised, general, given by the EC. For example, how many are the dropped-outs, how many are vaccinated…very vague and we give the information that we have, the general one. We give more details on the information in our own Monitoring system, as it is based on indicators drawn on priorities that Ministries have submitted to us’ - NRCP

The NRCPs can apply for funding with DG Justice to establish a National Roma platform, national online monitoring systems and other related activities. Besides that, funding at national level under an EU scheme or via a national budget are also available.

National Roma Contact Points remain at the centre of collecting and reporting on Roma-relevant inclusion policies. However, if these are genuine ‘contact points’ and whether working coordination mechanisms can be developed around them has yet to be seen for this upcoming period (until 2030).
The FRA and the EU Commission’s Perspectives

The FRA

The European Fundamental Rights Agency (FRA) is one of the European agencies supporting the work of DG Justice and Consumers of the European Commission in various policies concerning inequality, including those related to Roma. The FRA is based in Vienna and has 105 employees in various positions\(^{36}\) – none of them specific to Roma.

The FRA has been working on Roma issues for more than a decade now, mainly collecting and producing statistics: deciding on methodology for information collection, conducting field surveys and producing a quantitative database needed by the European Commission and Member States to measure discrimination and inequality across several domains.

Concerning Roma people, the Agency has two main tasks.

The first is to periodically conduct field surveys ‘on the ground’\(^{57}\) by asking Roma, Sinti, Travelers and other groups which fall under the umbrella of ‘Roma’ about their level of housing, education, employment, equality and non-discrimination etc. The collected responses are used to compare the ‘Roma’ picture to the non-Roma one.

The second major task of the FRA is to elaborate on the methodology of the reporting of the NRISs, more precisely, the FRA’s task is to decide on how (what indicators, measurements, statistics) the NRCPs should report to the EC.

The Reporting from the perspective of FRA

The interviewed FRA expert shares that in 2012, the FRA established the Working Party of NRCPs to collaborate on the issue of ‘how to report’, and in 2013 put in place the Council Recommendations on Roma Inclusion, providing the answer ‘on what to report’. Further developments on ‘how to report’ up to 2020 are summed up by the FRA as follows:

‘In 2015 we had the first variant of the Monitoring System in question – that was discussed for quite a long time and the first cycle for collecting information was in 2016. This was a long process because first we made it as a questionnaire. Then we decided that it needs to have a more intelligent form – a database, so we passed through several forms: Access – most of the people did not want it, then we said in the form of Excel - we made it Excel, then some of the countries said – wait, with us all this is decentralised – there must be a sub-national level - and it was really challenging! In the end we made it as an online variant – web application and we did it as such. This aims to fulfil the engagement towards the Council. MSs are not obliged, but they are expected to do this reporting. Before what they were reporting – emails, texts on Word – 50 pages, 100 pages…whatever they wanted to write. The idea was to introduce some element of quantitative data analysis’ – FRA Expert

Based on the answers given by the FRA, MSs reporting occurs once every two years. 2018 was the second round of reporting to the EC based on information collected in 2017 and published by the EC in its 2019 communication. In 2020, the NRCPs are expected to report again.

\(^{36}\) [https://europa.eu/european-union/about-eu/agencies/fra_en], accessed October 2020


‘We are in the basis of all this mechanism for reporting. We tried to find what is out there in the different countries and what can be used so that we have a comparability framework for monitoring.’

FRA Expert
The NRCPs have non-stop access to the Online Reporting Tool. Using the Online Reporting Tool, NRCPs can observe their work and the work of others, though this is not publicly available. The FRA admits that national reporting is not available to the public, but claims that this is not the FRA’s fault. The Agency can propose methodology and templates, along with some changes, but final decisions rest with the EC, which can discuss what to implement with NRCPs in their periodic meetings.

The FRA experts have a logic of reporting of output and outcome indicators.

‘The FRA only collects data on the outcome indicators. These are the surveys that we do. All the system follows the logic that we do some things, there are some resources that are invested in a problem – financial, human resources – after that these resources turn into programs, projects – there are outputs – concrete results, that are reported, we count them and the idea is that all these outputs bring change in the life of people – there is an outcome. We are responsible, and we make it periodically - we collect data about the state of people – outcome level’. – FRA Expert

In this sense, what MSs reported in 2019 are measures, or in FRA-language – ‘output indicators’. The 2019 Communication of the EC, however, showed a lot of weaknesses in the existing reporting tool. The following are those noticed and reflected upon by the FRA:

* How can the reporting of the NRCPs be combined and harmonise with the reporting on the Operational Programs (OPs), as most of the reported measures are funded by EU – in order to not to have redundant reporting? The OPs are reported at a product-level, e.g., how many conferences, how many shovels bought etc. This does not include what has been done or what happens in the long-term. This problem needs to be addressed in the framework of the EU funds, and should be harmonised with the Roma inclusion programs.

* A problem that has manifested from the first reporting: the NRCPs have massively reported many horizontal programs that are for all citizens of a given country as Roma-relevant. The idea is that designating them as Roma-relevant is appropriate because they may also be relevant for Roma, or they may be more relevant for Roma than for the population on average. For example, social protections are designated as Roma-relevant put in place without any explicit connection to Roma or any mechanism for determining how many Roma are concerned.

‘There was a country, I will not mention which, that reported all the health system reforms as measures for Roma integration. Why? Because Roma need access to health.’ – FRA Expert

This problem clearly stems from a lack of guidance on what makes a measure Roma-relevant.

* The source of funding of reported measures: The funding source is always indicated as a box in the online reporting tool. It specifies various elements of the funding, such as its sources, as well as whether it is state or non-state, European funding, as percentage of mainstream total funding (for example claiming that certain percent of funding of mainstream program benefited Roma) etc. Most countries, however, either do not have data or prefer to report that do not have data on this. This issue, however, appears to be complicated. If one reports that a broader program relating to health, for example, brought positive change to a number of Roma, it is difficult to estimate the number of Roma impacted by this change, or to estimate what percentage of the total program budget (if any) was dedicated for Roma inclusion.

“There is no harmonisation of definitions, terms, what is an effort… Everyone reports according to their understandings”

FRA Expert
WHAT MAKES A MEASURE RELEVANT?

Understanding the interaction between the European Commission and the National Roma Contact Points in reporting the implementation of National Roma Integration Strategies in 2012-2020

A quote for a number of measures does not specify what these measures should be, which allows Member States to include sweeping national programs or small, locally implemented NGO project, which both count towards fulfilling the quote

‘In the coming post-2020 updated system for reporting, this will be changed, and there we can have some comparability. We cannot say: both countries have 5 measures. Yes, but one is 5 x 1 million and the other one is 5 x 10 000. There is difference. So, we started developing this’ – FRA Expert

All of the above problems are to be addressed in the years to come. Yet the FRA realises that even the best monitoring system can have little influence on the content of the reported policies:

‘Whatever the monitoring system is – it can be better, worse, doesn’t matter. When there is no content on the places, no matter how good the monitoring system is – the content is important. The content can be motivated to a certain extent by a good monitoring system but to a very little extent. It has to come from all the people on the entire vertical – all the floors of power plus local organisations. I think that local organisations are not doing their work well enough’ – FRA Expert

The Roma Coordination Team at DG Justice

Originally, the unit where the EU Roma Framework 2011-2020 was produced was in DG Employment and Social Inclusion. In 2011, the creation of the Second Barroso Commission meant that Viviane Reding became responsible for gender and equality issues, and ‘Roma’ were transferred from DG Employment to DG Justice, while maintaining the strong involvement from DG Employment. Since then, a Non-Discrimination Unit has been created under the auspices of DG Justice, wherein one of three teams deals with the coordination of Roma inclusion policies. The number of members in the Roma Team has so far varied between 3 and 7, with each having 4-5 officials and 2 assistants. Over the years, the number of staff of Roma origin has varied between 1 to 3 people.

The main task of the Roma Team is to coordinate the implementation of the EU Roma Framework. This involves several other processes: to ensure that the issues concerning Roma inclusion are present within the European Semester country-specific recommendations

When the Framework was launched in 2011, there was a seven-year 2014-2020 EU programming period underway. Although the Framework explicitly mentioned that the Operational Programs could be modified, this was rarely the case, and was not possible until the beginning of 2014. What the EU Roma Framework did influence, however, was the seven-year period 2014-2020 by introducing a specific investment priority which targets Roma explicitly (but not exclusively), and by introducing

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59 On 17 December 2013 the funding for a specific Roma measure under the European Structural and Investment Funds becomes a fact. Thematic Objective 9: Promoting Social Inclusion, Combating Poverty and any discrimination has a specific investment priority under the European Social Fund named “Socio-economic integration of marginalised communities such as the Roma” and in order to access this funding, MSs should comply with Ex-ante conditionality. Thematic Objective 9: A National Roma Inclusion Strategic Policy Framework is in place. Although not explicitly, thematic objectives ‘8-Promoting sustainable and quality employment and supporting labour mobility’ and ‘10 - Investing in education, training and vocational training for skills and life-long learning’ under European Social Fund and the European Regional Development Fund can also be used to address Roma within the Operational Programs of the Member States, ‘EURoma-Report_Promoting-Use-of-ESI-Funds-for-Roma-Inclusion_Executive_Summary_Full-Report.Pdf’, accessed 24 May 2020, https://www.euromanet.eu/wp-content/uploads/2018/02/EURoma-Report_Promoting-Use-of-ESI-Funds-for-Roma-Inclusion_Executive_Summary_Full-Report.pdf.
with it an ex-ante conditionality which was linked to the existence of an NRIS, a partnership principle, simplification and the requirement to spend at least 20% of the European Social Fund on social inclusion. The explicitly Roma-specific reform was this Roma investment priority, along with the Country-Specific Recommendations under the European Semester. MSs which had Country-Specific Recommendations on Roma (and that varied in countries and topics), had to choose this investment priority. Practically this was enforced to them by the EC. Countries were required to introduce reforms not only by targeting Roma, but also by reforming mainstream priorities such as access to education and fighting early school departure, among others.

In 2020, this report recommends that DG Employment should come up with an evaluation report stating the portion of the European Social Fund that was used for social inclusion from 2014-2020. According to the Roma Team of DG Justice, 10 MSs allocated 1.5 million euros under the Roma-specific investment priority.

**Relation of the EU Framework to other EU strategic documents and processes**

According to the official from the Roma Team who was interviewed, the EU Roma Framework is related to several other major documents and processes:

**The European Semester:** the question here is how structural reforms can help Roma inclusion, including structural reforms in education, employment and social policies. If there is a request for structural reforms in these fields, then this is immediately linked to funding – to the Multi-Financial-Framework (MFF) and the MFF-negotiations.

The EU Roma Framework is also related to the **Racial Equality Directive** (RED)

[60](https://eur-lex.europa.eu/legal-content/GA/TXT/?uri=CELEX:32000L0043), accessed October 2020. In fact, the Roma team and the team responsible for the observance of RED are in the same unit. The Roma team supports the monitoring under the RED from the policy side. In essence, all the infringement procedures to date which have been issued on ethnic or racial grounds concerned Roma, namely the infringements on school segregation in Slovakia, the Czech Republic and Hungary.

**The UN Sustainable Development Goals** (SDGs)

[61](https://www.un.org/sustainabledevelopment/sustainable-development-goals/), accessed October 2020: a lot of the SDGs are directly relevant to Roma, so when the future Roma-related indicators and future targets are being discussed, the European Commission is having an attempt for synchronisation with the SDGs.

There are lots of other significant processes – the **European Pillar of Social Rights,**[62](https://www.socialplatform.org/what-we-do/european-pillar-of-social-rights/#:~:text=The%20European%20Pillar%20of%20Social%20and%20living%20conditions%20in%20Europe.) for example, is very important. An Action Plan for the European Pillar of Social Rights is anticipated in 2021 and the Roma Team is currently making efforts to link Roma concerns to it. There are several initiatives under the European Pillar for Social Rights, such as the **Child Guarantee** and the reinforced **Youth Guarantee** in both of which the Roma Team is trying to reinforce the link to Roma.

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The Reporting from the perspective of the Roma Team of the European Commission

The European Commission’s communication with Member States is proving to be complex. For example, the Commission cannot instruct the Member States to establish their national Roma contact point in a particular structure of the administration. It also cannot tell the Member States exactly what measures to implement for Roma inclusion; instead, it can only give general guidelines and establish a dialogue. The Commission cannot correct the reports of the NRCPs; it can only assess them. After all, the Commission cannot oblige Member States to report on their progress, it is merely ‘desirable’.

Still, the very small Roma team of the European Commission has undertaken enormous efforts to give capacity to the NRCPs with training and funding, to provide technical guidance on how to use the online reporting tool and to provide NRCPs with the technical and methodological assistance of the FRA.

In this period of reporting up to 2020, the Commission has been driven by two basic principles:

1. Uniformity and Comparability
   This logic says that no matter how different Member States are, they need to obey the same rules, agree on a common methodology and criteria of assessment and make efforts towards achieving same goals, including filling in same online report template. All this is done for the sake of comparing the efforts of State A to State B.

2. Progress Measurability
   The progress of each country needs to be measured in some way, and this measurement, for comparison purposes, is desired to be quantitative.

‘We had an issue when we started the reporting, just to illustrate the difficulty of having something comparable. Countries are so different. In the first year one country alone reported more measures than all the countries together because they reported regional measures as well. So, we had like 300 measures from this country and 200 all together from the other Member States. This kind of thing we had to then address and ask that country to merge the measures at national level. This is an attempt to make incomparable things a bit more comparable, and indeed there is a difficulty with that – that the reporting is on measures – because in countries with small Roma population maybe they have really just a limited number of targeted measures, while in other countries basically every mainstream measure can be relevant to Roma, so it is not very easy and this is why we had this more summary types of questions in the main policy areas and that’s what you also see in the country fiches from 2019.’ Commission Official

These principles emerged naturally from the very beginning of the EU Framework. At the time of this writing, they have not been questioned.

In response to the question ‘Is there a guideline for NRCPs describing what measure is relevant?’ the answer given was that the online tool (a web-based portal where Roma contact points upload their data and share findings in a central hub) has a guidance document for NRCPs on how to fill it in. The only guidance given to NRCPs is very broad, and relates to the ‘summary types of questions in thematic areas’ – obviously, not enough.

On the question ‘Who decides on what measures to report? What is a Roma-relevant measure?’ the answer given was:
‘The structure of the reporting. When NRCPs report a measure, we ask them to link this measure to a thematic area and to a sub-area based on the Council recommendations. Then sometimes, there is an overlap between areas, so we try to categorise the measures based on that’ – Commission Official

From these responses, it is not clear, apart from in the 2013 Council Recommendations, whether there are any other guidelines for countries to report on and, in particular, if they must report on the relevance of specific measures.

**What makes a measure Roma-relevant? Conclusions**

The aim of this research was to find out what procedures are in place to help National Roma Contact Points to report a policy measure as a Roma-relevant. In other words, its purpose was to analyse who decides on the Roma-relevance of the reported measures, and how this is determined.

After detailed interviews with the relevant actors (EC, FRA, NRCPs and Roma Civil Monitor experts), it is clear that for the period from 2011 to 2020, the European Commission has failed to adequately answer this question. It has also become clear that the reporting of measures is based entirely on the Council Recommendations of 2013, and on the personal opinions of the National Roma Contact Points on what is relevant. The Commission may assess the information provided by the Member States, but may not correct it.

For the period from 2011 to 2019, the national reports of the Member States are not publicly available. This calls into question every European Commission report over the years so far. There is no transparency. Civil society cannot examine the reports of the Roma national contact points, so it has no way to criticize them. The dialogue on this subject is conducted entirely by the European Commission, which acts as arbitrator and seeks to establish a process that is meaningful.

There is a lack of functioning institutional and civic coordination mechanisms in the Member States regarding the implementation of their National Roma Strategies. The operation of the few functioning mechanisms remains hidden. There are no clear web pages dedicated to the efforts of the Member States for Roma inclusion. In over 90% of cases, there are no national reports on the implementation of the Roma strategies either. This further exacerbates a problem: on the one hand, there are no national reports and, on the other, European reports are not publicly available. Whose problem are the Roma problems then?

Aside from the Roma Civil Monitor, which is becoming the European Commission’s most successful project for structured feedback on processes and outcomes, the process of receiving feedback from civil society is chaotic. Shifts have taken place over the years: first, there were no template forms for civil society contributions, then there were templates that consequently changed, then consultations took a different form and, still today most importantly, the subject of the consultations remains in doubt. It is unclear what civil society has contributed to when the Member States’ reports were not available.

Last but not least, these weaknesses remain largely unaddressed by civil society. European Roma networks, as well as established national organizations, fail to properly articulate the problems of the process. Some national leading organizations do not understand the mechanisms related to how the MSs report to the EC.

It seems that these 9 years have seen with no progress made for Roma inclusion in Europe. Perhaps the only positive outcome is the notion that a process to address this vital concern is developing naturally, but this development is still far from completion.

Given the extremely small size of the Roma team in the European Commission, one might argue that even the limited progress made so far has happened so far represents substantial effort. In addition, no one can deny the continuous efforts of the FRA in this process. Still, the results remain extremely unsatisfactory. The problems mentioned above remain unsolved.
On 7 October 2020, the EC adopted a new EU Framework for Roma Inclusion: the EU Roma strategic framework for equality, inclusion and participation up to 2030\(^63\). The new strategy is much improved compared to the one from 2020. The term ‘integration’ is forgotten while the document gives central place to ‘equality’, ‘inclusion’ and ‘participation’; it focuses on antigypsyism as a main obstacle and it covers groups that remained excluded in the previous document, such as Roma youth and Roma LGBT+. The document is accompanied by Council recommendations that set out much clearer criteria ‘on what’ the Member States should be reporting in the next 10 years. FRA is providing a ‘monitoring framework’ with a set of indicators which should guide the MSs on ‘how’ the reporting should be happening\(^64\).

Will the next report of the Member States be publicly available? Will we have structured civilian monitoring? Will future measures be relevant, or will we receive more from the same? These questions have also not yet been addressed.

There is a danger that the question of what makes a measure relevant to Roma inclusion will continue to go unanswered.

Therefore, below are some recommendations that might lead to some progress.

**Recommendations**

The logic of the FRA for forthcoming (post-2020) monitoring is based on three main types of indicators: structural, process and outcome indicators.

Structural indicators are useful because one can use them to monitor whether there is a National Roma Strategy or a set of policies, the enforcement of the Discrimination Act with regards to Roma, and also can evaluate whether there is a National Roma Contact Point, what is its capacity in terms of human and financial resources, whether the NRCP is part of the EU Funds Management Committees, whether institutional and civil society coordination mechanisms have been established etc.

Process indicators include the actual policies, measures and actions that are reported by NRCPs as relevant to Roma inclusion. These might be targeted (explicitly for Roma) or broader (with relevance to Roma determined in some other way) measures that can be related to Roma.

Outcome indicators are mirroring the situation of the Roma on the ground: what are the living conditions of Roma households (such as the number of bedrooms, access to running water etc.), access to health care, educational level etc. Generally, these are surveys that can be conducted by research agencies or civil society based on questionnaires where the general idea is to compare the ‘Roma picture’ to the ‘Non-Roma’ and measure the gaps.

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In order to have a functioning structural mechanism, a National Roma Contact must be put in place with enough human and financial resources. A National Roma Contact also needs to have clearly-established structured institutional coordination mechanism, a clearly-established structured civil society coordination mechanism and should ideally be part of the Steering Committees of Operational Programs (EU Funding) or should be able to suggest use of national funding structured civil society coordination mechanism and it is ideally part of the Steering Committees of Operational Programs (EU Funding) or can suggest use of national funding.

Figure 5: Structure-process-outcome indicator process

Figure 6: Necessary prerequisites for an effectively functioning NRCP
For this relationship to be effective, the principles of accessibility (who can be a member, clear rules and selection criteria) as well as transparency (everyone must be able to see what is happening within these structures from the outside) must be respected.

I. The EC, together with civil society, must elaborate on a clear guidance for creating an effective structured institutional mechanism for coordination and dialogue on Roma inclusion: criteria for structured mechanisms with institutions and structured mechanisms with civil society: which ministries and agencies should be involved; which NGOs should be involved; what is the procedure of becoming part of these structured mechanisms; transparency of decision-making; participation in the work of Steering Committees of Operational Programs; what should the annual work programme include; how to ensure that policy learning and policy changes at the level of institutions and programs is achieved; etc.

II. With regards to the problem of deciding on Roma-relevance:
Outcome monitors should be changed for output monitors. The current understanding of ‘outcome’ indicators is that they establish the current situation of the Roma on the basis of interviews. Although logically process indicators (programs, measures) lead to results - outputs, their monitoring remains neglected. What if we did a survey and asked not ‘Do you feel discriminated against?’ but ‘Do you receive social benefits?’, ‘Do you receive child benefits?’, ‘Do you have a business?’, ‘Do you know about the training and qualification program offered by the employment office?’ etc. Based on these answers, we will be able to decide whether a program is relevant to the Roma or not, touching on the principle of self-dentification, but also clearly knowing where larger populations of Roma live.

III. National Roma contact points should have separate web pages where all information about the structures and all reports are available.

IV. In addition to assessing National Roma Strategies, it is much more important to make a thorough assessment of National Roma Contact Points, their resources, their coordination mechanisms and the barriers they face. In the event that a lack of political will is established, the EC must hold bilateral meetings.

V. In addition to assessing National Roma Strategies, it is much more important to make a thorough assessment of National Roma Contact Points, their resources, their coordination mechanisms and the barriers they face. In case it is established that there is no political will, the EC must hold bilateral meetings.
VI. The EC should introduce the cluster model used in the Roma Civil Monitor more widely in its work and in the reporting of the Member States. Not all members have large populations of Roma and Roma do not face the same issues everywhere. These differences should be taken into account so that reporting becomes more country-specific, rather than trying (unsuccessfully) to be universally comparable.

VII. In an attempt to achieve comparability, it worth noting the difficulty of comparing a country’s progress against others over a period of, say, two years. And is this really needed? Comparing Spain with Finland annually in terms of the number of measures reported does not make as much sense as measuring each country’s progress against itself: for example, compare achievements of Spain in 2022 to achievements of Spain in 2021.

*Figure 8: The reporting process of the EU Roma Strategic Framework*
### Annex 1: National Roma Integration Strategies of EU Member States
*(presented to the European Commission under European Conclusions from 23-24 June 2011)*

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<td>UK</td>
<td>Progress report by the ministerial working group on tackling inequalities experienced by Gypsies and Travellers</td>
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[4] The French government strategy for Roma Integration is submitted to the EC on 8 February 2012; The German Integrated Packages Measures are submitted to the EC on 23 December 2011; Ireland’s National Traveller/Roma Strategy is submitted to the EC on 31 January 2012


[8] Malta does not have a National Roma Integration Strategy as the state claimed there are no Roma living on Maltese territory.

[9] Poland’s Programme for the Integration of the Roma Community in Poland for the period 2014-2020 is adopted on 7 October 2014

[10] Portugal updates the National Roma Communities Integration Strategy for the period 2013-2022 on 8 November 2018


[13] the United Kingdom government has not established a National Roma Integration Strategy. This is because at a EU Member States meeting (Employment, Social Policy, Health and Consumer Affairs Council, 2011), it was agreed that Member States were not required to produce National Roma Integration Strategies (NRIS), instead they could have the ‘flexibility’ to develop policy measures within wider social inclusion policies, as an alternative to producing national strategies. In response to a call for a NRIS, the UK Government have suggested that the mainstream laws and policies already offered protection to GRT populations and that these policies would in themselves promote integration. The UK’s National Roma Integration Strategy (NRIS) is not a strategy as such, but rather an integrated set of policy measures within the UK’s social inclusion policies. The progress of the measures is the responsibility of the Ministerial Working Group (MWG), coordinated by the Department for Communities and Local Government (DCLG). The MWG produced 28 commitments across education, employment, health, housing and anti-discrimination aiming to improve the integration of Gypsy and Travellers in the UK, which hardly mentioned Eastern European Roma (National Roma Network). The Welsh Government established the only clear Roma Integration Strategy and a framework for action in the UK – ‘Travelling to a Better Future: Gypsy and Traveller Framework for Action and Delivery Plan (2012)”
**Annex 2: National Roma Contact Points (as of June 2020)**

<table>
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<tr>
<th>No</th>
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<tr>
<td>1</td>
<td>Austria</td>
<td>Federal Chancellery – Section II Integration, culture and people group/5:People group affairs</td>
<td>Dr. Susanne Pfanner <a href="mailto:roma@bka.gv.at">roma@bka.gv.at</a></td>
<td>Yes: section at common website</td>
</tr>
<tr>
<td>2</td>
<td>Belgium</td>
<td>Federal inter-ministerial service - PPS Social Integration, anti-Poverty Policy, Social Economy and Federal Urban Policy</td>
<td>Isabelle Martijn <a href="mailto:isabelle.martijn@mi-is.be">isabelle.martijn@mi-is.be</a></td>
<td>Yes: section at common website</td>
</tr>
<tr>
<td>3</td>
<td>Bulgaria</td>
<td>Council of Ministers – National Council for Cooperation on Ethnic and Integration Issues</td>
<td>Rositsa Ivanova <a href="mailto:rositsa.ivanova@government.bg">rositsa.ivanova@government.bg</a></td>
<td>Yes: Special website(s)</td>
</tr>
<tr>
<td>4</td>
<td>Croatia</td>
<td>Government Office for Human Rights and Rights of National Minorities</td>
<td>Alen Tahiri <a href="mailto:alen.tahiri@uljppnm.vlada.hr">alen.tahiri@uljppnm.vlada.hr</a></td>
<td>Yes: section at common website</td>
</tr>
<tr>
<td>5</td>
<td>Cyprus</td>
<td>Ministry of Labor, Welfare and Social Insurance - Social Welfare Services</td>
<td>Georgia Antoniou <a href="mailto:gantoniou@sws.mlsi.gov.cy">gantoniou@sws.mlsi.gov.cy</a></td>
<td>Yes: section at common website</td>
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<tr>
<td>7</td>
<td>Denmark</td>
<td>Ministry of Immigration and Integration – Agency for International Recruitment and Integration – SIRI - Office for Employment</td>
<td>Nadja Glavas <a href="mailto:nagl@siri.dk">nagl@siri.dk</a></td>
<td>No information on Roma available online</td>
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<tr>
<td>8</td>
<td>Estonia</td>
<td>Ministry of Culture, Department of Cultural Diversity</td>
<td>Mall Saul <a href="mailto:mall.saul@kul.ee">mall.saul@kul.ee</a></td>
<td>Yes: no section on Roma</td>
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<tr>
<td>9</td>
<td>Finland</td>
<td>Ministry of Social Affairs and Health, Advisory Board on Romani Affairs</td>
<td>Sarita-Friman Korpela <a href="mailto:sarita.friman-korpela@stm.fi">sarita.friman-korpela@stm.fi</a></td>
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<td>France</td>
<td>Ministry of Territorial Cohesion and Relations with Local Authorities - Director Inter-ministerial Delegate to Accommodation and Access to Housing (DIHAL) – Slum resorption unit</td>
<td>Manuel Demougeot <a href="mailto:manuel.demougeot@developpement-durable.gouv.fr">manuel.demougeot@developpement-durable.gouv.fr</a></td>
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<tr>
<td>11</td>
<td>Germany</td>
<td>Ministry of Interior, Division AM2 - Ethnic German Resettlers and National Minorities in Germany</td>
<td>Mirjam Sieber <a href="mailto:hi6@bmi.bund.de">hi6@bmi.bund.de</a></td>
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<td>12</td>
<td>Greece</td>
<td>Ministry of employment, social insurance and welfare</td>
<td>Ms Aikaterini Giantsiou <a href="mailto:egroma@yeka.gr">egroma@yeka.gr</a></td>
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<td>13</td>
<td>Hungary</td>
<td>Ministry of Interior</td>
<td>Mr László Ulicska <a href="mailto:laszlo.ulicska@bm.gov.hu">laszlo.ulicska@bm.gov.hu</a></td>
<td>No information on Roma available online</td>
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<td>14</td>
<td>Ireland</td>
<td>Department of Justice and Equality – Equality Division - Traveller and Roma Inclusion Unit</td>
<td>Garrett Byrne <a href="mailto:GPByrne@justice.ie">GPByrne@justice.ie</a></td>
<td>Yes, special website</td>
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<td>Contact Person</td>
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<td>Presidency of the Council of Ministers, National Anti-Racial Discrimination Office – UNAR, Department for Equal Opportunities</td>
<td>Roberto Bortone</td>
<td><a href="mailto:r.bortone@governo.it">r.bortone@governo.it</a></td>
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<tr>
<td>Latvia</td>
<td>Ministry of Culture, Department of Society Integration affairs, Social Integration and Civil Society Development Division, Advisory Council for Implementation of the Roma Integration Policy</td>
<td>Deniss Kretalovs</td>
<td><a href="mailto:Deniss.Kretalovs@km.gov.lv">Deniss.Kretalovs@km.gov.lv</a></td>
<td>Yes: section at common website</td>
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<tr>
<td>Lithuania</td>
<td>Department of National Minorities under the Government of Republic of Lithuania</td>
<td>Gražina Sluško</td>
<td><a href="mailto:grazina.slusko@tmde.lt">grazina.slusko@tmde.lt</a></td>
<td>Yes: section at common website</td>
</tr>
<tr>
<td>Luxembourg</td>
<td>Luxembourg Government, National Reception Office - ONA</td>
<td>Marie-Louise Kapgen</td>
<td><a href="mailto:Malou.kapgen@fm.etat.lu">Malou.kapgen@fm.etat.lu</a></td>
<td>No information on Roma available online</td>
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<td>Netherlands</td>
<td>Ministry of Social Affairs and Employment</td>
<td>Martijn Kraaij</td>
<td><a href="mailto:mkraaij@minszw.nl">mkraaij@minszw.nl</a></td>
<td>Yes: no section on Roma</td>
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<tr>
<td>Poland</td>
<td>Ministry of Internal Affairs and Administration, Department of Religious Denominations and National and Ethnic Minorities</td>
<td>Malgorzata Rozycka</td>
<td><a href="mailto:malgorzata.rozycka@mswia.gov.pl">malgorzata.rozycka@mswia.gov.pl</a></td>
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<td>Portugal</td>
<td>High Commission for Migration</td>
<td>Marisa Horta</td>
<td><a href="mailto:marisa.horta@acm.gov.pt">marisa.horta@acm.gov.pt</a></td>
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<td>Romania</td>
<td>Ministry of European Funds</td>
<td>Malgorzata Rozycka</td>
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<td>No information on Roma available online</td>
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<td>Ludmila Plachá</td>
<td><a href="mailto:Ludmila.Placha@minv.sk">Ludmila.Placha@minv.sk</a></td>
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<td>Ministry of labour and social economy, Ministry of Inclusion, social security and migrations</td>
<td>Angel Parreño Lizcano</td>
<td><a href="mailto:dgps@mschs.es">dgps@mschs.es</a></td>
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<td>Ministry of Employment, Division for Discrimination Issues, Human Rights and Child Rights Policy</td>
<td>Annilie Nyberg</td>
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Annex 3: Questionaries for research-respondents

Questionnaire to the EC

» Concerning unit structure
1. When was the Roma Unit established?
2. What are the main tasks of the Roma Unit?
3. How many people staff does the unit have?

» Concerning interaction with other EU stakeholders
4. Is there an EU Roma Taskforce? Officially? Who is in it?

» Concerning NRCPs
6. Since when NRCPs exist?
7. What is the task of NRCPs?
8. How often do you communicate with NRCPs?
9. Do you have a training for NRCPs?
10. Do you provide funding for NRCPs?

» Concerning reporting procedure
11. Is there a guideline for NRCPs describing what measures are relevant?
12. Who decides on what measures to report? What is a Roma-relevant measure?
13. What tools you are using for reporting?
14. How often is the reporting from NRCPs happening?
15. How often is the reporting from the Commission to the Council?
16. Why country reports are not available for public?
17. What about the funding of Roma measures?

» Interaction with others
18. How do you interact with FRA? What is the role of FRA in the process of Roma Inclusion?
19. How do you interact with European Court of Auditors?
20. Civil Society: how was the idea of the Monitor born? How do they collect information?
21. Interaction with RCC 2020?

» Recommendations
22. What can be done better, what can be improved in the process of reporting and Roma inclusion in general?

Questionnaire to NRCPs

» Concerning positioning in state hierarchy
1. What is the position of NRCP compared to other institutions? Are you a separate institution or part of which institution you are?
2. Since when you are working as NRCP? How long have you been part of this position?
3. Since what time your country has a NRCP?
4. How many people work on Roma Inclusion in your country? Are there any special structures?

» Concerning collection of information on Roma measures
5. How do you collect data on the implementation of Roma Measures?
6. What is a Roma measure for you?
7. What guidance the EC provides you on the reporting of measures?
8. How often do you communicate with EC?
9. Do they provide you with training?
10. Funding for NRCPs?
11. Who decides on the funding of the Roma measures in your country?
12. What tools you are using for reporting of Roma measures?
13. Does your National Roma Integration Strategy have a budget? Action plan?
14. Do you cooperate with civil society? How?
15. What can be done better, what can be improved in the process of reporting and Roma inclusion in general?

Questionnaire to Civil Society Monitor Experts

1. What was the task of the CSM?
2. What guidance/training did you receive?
3. Have you been in touch with your NRCP?
4. What tools did you receive for completing the report? Was there a pattern that you needed to follow? A questionnaire that you needed to complete?
5. Was your report different than the one of NRCP? Did you have access to the report of NRCP?
6. What is a Roma measure? What Roma measures you have in your country?
7. Who decides on the measures and on the funding?
8. What can be done better, what can be improved in the process of reporting and Roma inclusion in general?

Questionnaire to FRA

9. What is the role of FRA in the process of Roma Inclusion?
10. What guidance do you provide to the EC?
11. Do you provide any guidance or training to NRCP?
12. What is the online monitoring tool about? When was it created? Who participated in it?
13. What makes a measure Roma-relevant?
14. What can be done better, what can be improved in the process of reporting and Roma inclusion in general?

Bibliography


WHAT MAKES A MEASURE RELEVANT?
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