
Review of EU Framework National Roma Integration Strategies (NRIS)

Open Society
Foundations review
of NRIS submitted by
Bulgaria, the Czech
Republic, Hungary,
Romania and
Slovakia

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Foreword

This review comprises evaluations conducted by Open Society Foundations of the National Roma Integration Strategies (NRIS) submitted by the governments of Bulgaria, Hungary, Romania and Slovakia, and the 2010-13 Roma Integration Concept submitted by the Czech Government in lieu of a strategy. It also includes a review of the use of EU Funds in each of the four NRIS by the Open Society Foundations' "Making the Most of EU Funds for Roma" (MtM) initiative.

All these countries were founding members of the Decade of Roma Inclusion 2005-2015. At the launch of the Decade in Sofia in 2005, the prime ministers of participating countries pledged that their governments would work toward eliminating discrimination and closing the unacceptable gaps between Roma and the rest of society; develop National Action Plans (NAPs) in the four key priority areas of health, housing, employment, and education; and demonstrate progress by measuring outcomes in implementation.

In theory, with this experience behind them, and the fact that the Decade and the EU Framework priorities are identical, these five countries were best placed among Member States to meet all the European Commission's requests contained within the April 5 Communication and deliver comprehensive NRIS.

In practice, while there is discernible progress in many areas, duly noted in the evaluations that follow, it is clear that much more is needed to meet the Commission's ambition 'to make a difference by 2020'. The NRIS submitted to the Commission can only be regarded as first drafts, as work in progress. The documents are replete with weaknesses already evident in the Decade NAPs. The analyses contained in some of the NRIS are astute and provide evidence of how government thinking has evolved over recent years on the issue of Roma inclusion. Good intentions need to be bolstered by concrete targets and timelines, allocated budgets, the kind of data that allows for 'robust monitoring' of progress, and a recognition that national integration strategies cannot succeed without resolute and unequivocal action to combat racism and discrimination.

The Open Society Foundations supported civil society dialogue and advocacy in each of these 5 countries, and cooperated with governments in the process of consultation between the April Communication and the December deadline for submission of NRIS. Governments' openness to consultation and dialogue was encouraging, but if these strategies are intended to make a tangible difference to the lives of millions by 2020, it is clear that the conversation has just begun.

EU Funding

The Commission's Task Force report confirmed that "member states do not properly use EU money for the purpose of effective social and economic integration of Roma." It noted that a lack of know-how and capacity to absorb EU funds is compounded by weak inclusion strategies and bottlenecks at national regional and local levels. The declared intent in the Communication is to 'surmount capacity issues', and work with Member States to change operational programmes in order to address new needs, simplify delivery and speed up the implementation of priorities.

The assessment from MtM is clear: while there are significant differences in the ambition and quality of various NRIS all the 4 strategies fail on two counts: (i) the NRIS fail to describe how EU funds will be better used for Roma inclusion, and (ii) fail to fulfill the criteria set by the EU framework and quoted by the draft EU regulations.

There is little in the NRIS that resembles a strategic effort by Member States to improve absorption capacity of EU funding instruments. It is a matter of concern that, apart from Slovakia, there is no mention in the NRIS of article 7(2) of the ERDF regulation which allows funds to be used for housing and infrastructure. The Commission issued a guidance note on the implementation of integrated housing interventions in favor of marginalized communities and launched its 'Pilot integrated housing schemes for marginalized communities' to promote use of ERDF. Revised NRIS should be cognizant of the possibilities under this amendment and reflect these developments.

In the Framework Communication, the Commission pledged to swiftly examine requests from Member States for programme modifications that relate to the integration strategies. Member States should take the Commission up on its invitation to amend their operational programmes in order to better support Roma targeted projects, and to align them with their NRIS. The strategies need to be revised to reflect the outcomes of such endeavours.

Disaggregated Data

Among the common features that emerged was the deficit of ethnically disaggregated data. The reality is that ethnic data—as one component within disaggregated data—can be generated and used in ways that protect the privacy of individuals and groups while providing critical information to help policymakers fight racism and discrimination and draft viable equality programs. The European Commission should issue guidelines on the interpretation of its regulations on ethnic data collection and processing to clearly and authoritatively prevent any misconceptions or misinterpretations that the regulations are an absolute prohibition on the use of data regarding ethnicity. Three key points from our report No Data No Progress:

- **Misinterpreted Legislation Hinders Data Collection Policy:** The data protection legislation, coupled with any laws regulating statistics, constitute the supporting framework for data collection policy in each country reviewed. Thus, every country has a policy, but those laws are often either restrictively interpreted, which impedes ethnic data collection, or there is insufficient legislation, such as the Race Relations

Act 2000 in the United Kingdom, to delineate those data protection safeguards that permit the collection of data on ethnicity under specified conditions. It is simply a myth that the collection of ethnic data in countries is forbidden.

- **Underutilized Data Sources:** There are three main sources of data on the various indicators: official national level sources, international organisation sources (UNDP, Council of Europe, UNICEF, etc.), and academic and NGO publications and materials that draw upon these official datasets as well as upon authors' own research. The Open Society Roma Initiatives' research has shown that where there are large gaps in official data, often data exist from other sources that fill those gaps. The *No Data No Progress* review of government national action plans, however, indicates that few governments are drawing on these sources to monitor their compliance with their Decade commitments. The same holds true for NRIS.
- **Weak Monitoring:** Governments have officially published only very limited evaluations on Decade progress. The reports that are available lack analytic depth and often amount to little more than a restatement of the action plans' goals. The lack of data from which to monitor progress, and the existence of indicators for which there are no data, are major factors behind the dearth of monitoring and evaluation of the Decade so far. The Framework Communication called for robust monitoring, but there is a danger that old habits of weak monitoring and perfunctory reporting will persist as long as governments fail to collate reliable baseline disaggregated data.

Gender Mainstreaming

The lack of emphasis in the Communication on gender equity is reflected in the failure of NRIS to address the multiple discrimination faced by Romani women. For example, while the Hungarian NRIS was credited for including astute analysis of the situation of Romani women and general ideas about improving the situation of Romani women, according to the Hungarian Women's Lobby much more is needed:

The Action Plan should define specific measures, deadlines, and resources for the problems identified, for example: action plans to increase the participation of Roma women and girls in educational systems; initiatives aimed at improving the reproductive health of Roma women (including access to family planning methods); targeted occupational programs including vocational training education; programs to prevent domestic violence against Roma victims and the provision of adequate services to victims; efforts to combat trafficking for the purpose of sexual exploitation.

We are convinced that situation of Roma women should be addressed both by provisions of equal opportunities for men and women horizontally as well as in the form of targeted interventions in the different policy areas. Therefore, the "political principles of social inclusion" should include the principle of gender mainstreaming.

The importance of 'explicit but not exclusive targeting' of Romani women cannot be overstated: first as a legitimate affirmative action in its own right; and second for the wider, long-term impact on the community and wider societal cohesion. As primary carers for their children and most often the mediators between family, state institutions and service providers, the active engagement of Romani women in community development and policy implementation is a prerequisite for successful interventions in areas such as child protection, education, and health care. As the Commission's own report on Ethnic Minority and Roma women in Europe states: "Investing in Roma women ... lays the foundations for a longer-term and effective inclusion of future Roma generations." It is imperative that the principle of gender mainstreaming be fully incorporated into NRIS in a consistent manner across all Member States.

Early Childhood Education and Care

Ensuring at least two years of high-quality preschool education for each Roma child has been one of the targets of the Decade since its inception. With regards to access to education, the Communication merely called on states to 'ensure that every child completes primary school' with a cursory mention of pre-school and early childhood interventions. By contrast, the European Commission's communication on February 17, 2011 on early childhood education and care (ECEC) was far more explicit in highlighting the key role that ECEC can play in overcoming the educational disadvantage faced by Roma children. It stated that 'although their needs are greater, participation rates of Roma children in ECEC are significantly lower than for the native (sic!) population, and expanding these opportunities is a key policy challenge across the EU.' In their current form the NRIS are not up to the meeting this challenge.

Given the limited coverage of early childhood services in many countries for those aged 0-3 years, and number of years it takes to meet 'key policy challenges' there is a grave danger that thousands of children will be passed over without direct intervention.

In their NRIS, Member States, as a minimum should set clear targets to ensure that all children, including Roma, have access to two years of quality pre-school; and that the percentage of Roma children completing primary school is the same as the percentage of majority children, with an aim to meeting the EU 2020 goal for school completion for Roma and non-Roma children.

Early childhood interventions are crucial to success in primary and secondary education. Concise targets and firm indicators need to be in place so that Member States ensure that all Roma children have access to quality integrated education, and measures taken to reduce the gap in secondary school completion rates.

The Communication states that Romani children and young people should not be subjected to discrimination, or schooled in segregated settings. What's lacking in NRIS is a firm and unambiguous commitment to end school segregation, and to desist from the practices of misdiagnosing Roma children as 'mentally handicapped' and sending them to special schools in defiance of the ruling of the European Court of Human Rights that such practices are discriminatory and unlawful.

Health

The Roma Initiatives' report *Beyond Rhetoric* contained a wealth of general and country-specific recommendations that should be incorporated into NRIS. They were not, and the health sections of NRIS need to be revisited and thoroughly revised.

In short if Member States intend to make a difference to the health of their Roma citizens by 2020, they should take all necessary measures to ensure the elimination of individual and systematic discrimination against Roma in healthcare services by providing access to quality healthcare and social services to the Roma at a similar level and under the same conditions as for the rest of the population.

In the context of their NRIS, member states should establish concrete targets with concrete timelines for the following: raising the life expectancy of Roma; raising child vaccination rates to the level of the non-Roma population; and lowering infant and maternal mortality rates to the level of the non-Roma population. Where possible, there should be an increased involvement of qualified Roma in healthcare programs targeting their communities. Action to improve the health of Roma populations requires a commitment to the shared values of solidarity, equity, and participation, which should be manifested in health policies, resource allocation, and service delivery.

Anti-Discrimination

The persistence of anti-Roma violence and hate speech last year served as a grim reminder that across Europe, anti-Gypsyism is so deeply ingrained—prejudice and intolerance towards Roma is so pervasive—that national integration strategies cannot succeed without resolute and unequivocal action to combat racism and discrimination. Put simply, racism and prejudice unchecked will derail progress.

On March 8, [a resolution of the European Parliament](#) called on the European Commission to link social inclusion priorities to a clear set of objectives that included protection of citizens against discrimination in all fields of life; promotion of social dialogue between Roma and non-Roma to combat racism and xenophobia; and for the Commission, as guardian of the treaties, to ensure full implementation of relevant legislation and appropriate sanctions against racially motivated crimes.

The need to link social inclusion priorities with robust measures to combat discrimination and a zero-tolerance approach to anti-Gypsyism was reaffirmed on February 1, 2012, by a declaration adopted by the Council of Europe's Committee of Ministers.

The resolution recognized the interdependence of inclusion and anti-discrimination, and recommended that any strategy, programme or policy developed to improve the situation and integration of Roma should include, in addition to measures promoting the social and economic inclusion of Roma in areas such as education, health, employment and housing, measures to combat discrimination, and challenge anti-Roma stereotypes:

Such documents should make clear that attitudes among the non-Roma population are a crucial factor that needs to be addressed. Roma integration measures should include both measures targeted at the Roma population (in particular positive measures) and measures targeted at the non Roma population, notably to combat anti-Gypsyism and discrimination.

The resolution underlined the need for all member States to adopt specific and comprehensive anti-discrimination legislation in line with international and European standards; to set up anti-discrimination bodies equipped to promote equal treatment and to assist victims of discrimination; and to ensure that this legislation is effectively implemented. These recommendations need to be fully incorporated into the NRIS. The revised strategies should reflect an unambiguous recognition of the interdependence of inclusion and anti-discrimination as a prerequisite for meaningful integration.

Note: Contributors to the NRIS review included Adam Kullmann, MtM (Hungary), Maria Metodieva, Open Society Institute–Sofia (Bulgaria), Milan Simecka Foundation (Slovakia), Montessori (Slovakia), People in Need (Slovakia), Valentina Petrus, Open Society Foundation–Bratislava (Slovakia), Filip Rameš, Open Society Fund–Prague (Czech Republic), Štěpán Ripka, Charles University, Prague (Czech Republic), Savelina Roussinova, MtM (Bulgaria), Iulian Stoian, Soros Foundation Romania (Romania) and Daniela Tarnovschi, Soros Foundation Romania (Romania).

The Use of EU Funds for the National Roma Integration Strategies (MtM)

Background

The EU framework for national Roma integration strategies, adopted by the Council, stresses the need for using EU funds. Besides the general invitation to make the best use of the funds, it calls for:

- making the Structural Funds and the European Agricultural Fund for Rural Development more accessible for Roma inclusion projects;
- making full use of the European Regional Development Fund for housing;
- making greater use of technical assistance;
- increasing the duration of projects;
- ensuring that the various EU funds available work together in a more integrated and flexible manner in the future;
- assessing results.

In addition to the above, the Communication of the Commission also refers to the use of global grants.

The draft EU regulations for the cohesion policy in the 2014-20 period also link the use of EU funds to the national Roma integration strategies, most explicitly by:

- requiring that at least 20% of the ESF should be used for social inclusion;
- making the use of EU funds for social inclusion conditional to the existence of a national Roma integration strategy that is in line with the EU framework, with special respect to:
 - achievable national goals to bridge the gap with the general population;
 - identification of disadvantaged micro-regions or segregated neighbourhoods (this may have direct relevance to the use of EU funds);
 - sufficient funding from national budgets;
 - strong monitoring methods;
 - close cooperation and continuous dialogue with Roma civil society.

MtM assessed the NRIS of the four EU Member States with the highest concentration of Roma: Slovakia, Hungary, Romania and Bulgaria, from the point of view of using EU funds.

General Comments about All Four NRIS

While there are significant differences in the ambition and quality of various NRIS and chapters, all the four NRIS fail both:

- to describe how EU funds will be better used for Roma inclusion; and
- to fulfill the criteria set by the EU framework and quoted by the draft EU regulations.

It may seem simplistic, but indeed none of the 4 NRIS describe how they plan making existing EU funds more accessible for Roma inclusion projects, in particular:

- using financial instruments such as the European Agricultural Fund for Rural Development;
- making greater use of technical assistance,
- increasing the duration of projects,
- ensuring that the various EU funds available work together in a more integrated and flexible manner in the future,
- assessing results,
- using global grants.

A more differentiated picture follows:

- making full use of the European Regional Development Fund for housing - the Slovak NRIS explicitly commits itself to using ERDF for housing;
- identifying disadvantaged micro-regions or segregated neighbourhoods—these micro-regions and neighbourhoods have been identified in Slovakia and Hungary; however, no programs are planned for them at this stage.

The above deficiencies can be explained partly because governments do not want to make binding commitments at this stage, when neither the EU rules nor the main national goals are set for the 2014-20 period.

We believe the contradictions between the EU requirements and the current NRIS can be resolved—especially if this is initiated by the Commission—by the revision of the NRIS or, more realistically, the approval in 2012 of action plans for the 2014-20 period.

Country-specific Comments

In this section, we rely not only on the NRIS itself, but also on information about the situation of using EU funds for Roma inclusion in these countries that should also be reflected in the NRIS.

Slovakia

- The major national approach for using EU funds for Roma inclusion was the comprehensive approach for marginalized Roma communities. A number of problems occurred, due to weak political commitment, fragmented management and budget (note: e.g. the integrated program in Hungary could overcome the problems of similarly fragmented management and budget, so this may not be the real problem). Still, the concept of targeting small areas of concentrated social problems with integrated programs is fully in line with the thinking of the Commission. A revised version of the comprehensive approach—in line with the common basic principles, including explicit but not exclusive targeting, and experiences of similar integrated programs in other countries—can be feasible for the next period. The NRIS describes the situation and options but no plans.

The NRIS or its action plan should describe plans for the revision of the comprehensive approach.

- In the current period, a 5% own contribution (co-financing from the implementing organization) is requested for ESF projects, also from NGOs. This is unusual in the EU (as these projects are for the benefit of the participating people, not for the implementing organization), and a major barrier of the access to EU funds for many organizations active in Roma inclusion. The NRIS admits the problem but doesn't take concrete action.

The NRIS or its action plan should describe concrete action to stop requesting own contribution for ESF projects from NGOs.

Hungary

- An innovative approach of the Hungarian authorities is the equal opportunities or social inclusion conditionality from 2007 on: using ERDF for the renovation of schools, the development of towns, and developments within the most disadvantaged micro-regions' program is conditional to the preparation and implementation of an equal opportunities plan. Experiences prove that this conditionality works only if it is underpinned with strong guarantees, e.g. qualified and independent equal opportunities experts assessing the plans. The approach is also part of the NRIS, but guarantees are not described.

The NRIS or its action plan should describe guarantees for equal opportunities conditionality.

- A national approach is the integrated program of the most disadvantaged micro-regions with special focus on Roma inclusion from 2008 on, with significant amounts of ERDF and ESF. The concept is fully in line with the current thinking of the Commission. The approach is reflected also in the NRIS, but plans for future are not described.

The NRIS or its action plan should describe plans for the integrated development of the most disadvantaged micro-regions with national and EU funds.

- Another national approach is the program against child poverty in the most disadvantaged micro-regions from 2007 on, with significant amounts of ESF. The approach is reflected in the NRIS, and plans for the remaining part of the current period are described, but plans for the next period and plans for sustaining the services (including sure start and "tanoda" programs) are not.

The NRIS or its action plan should describe plans for the fight against child poverty with EU funds in the next period, and plans for sustaining the services (including sure start and "tanoda" programs).

- We are aware that national authorities have plans for using ERDF for housing. However, these are not reflected in the NRIS.

The NRIS or its action plan should reflect plans for using ERDF for housing.

- The National Development Agency ordered an evaluation of EU funded schemes targeting Roma inclusion. The evaluation was finished a couple of weeks after the adoption of the NRIS. It contains a number of recommendations both for the current and for the next period.

The revised NRIS or its action plan should reflect recommendations of the evaluation of EU funded schemes targeting Roma inclusion.

Romania

- The NRIS declares as one of its principles “increasing the absorption of EU funds for the social inclusion of disadvantaged categories”. However, this declaration is not credible, as 1) the general absorption of the EU funds is extremely low in Romania; 2) no concrete steps are described to increase the absorption.

The NRIS or its action plan should describe concrete steps to increase absorption.

- Major bottlenecks in the regulatory environment include the 2% own contribution (co-financing from the implementing organization) requested for ESF projects, also from NGOs, and difficulties of liquidity caused by the combination of low and changing level of advance payment and slow interim and final payments.

The NRIS or its action plan should describe concrete steps to stop requesting own contribution for ESF projects from NGOs, and to ease difficulties of liquidity.

- National authorities seemed to be open to launch global grants with experienced NGOs as intermediate bodies, in line with the Commission’s proposal. However, this is not reflected in the NRIS.

The NRIS or its action plan should describe concrete steps to launch global grants with experienced NGOs.

- The NRIS envisages specific approach of using EU funds for Roma inclusion: “developing a separate financial mechanism, in the framework of the 2014 – 2020 financial programming, supporting the professional inclusion of persons belonging to Roma minority, through activities specific to SOP HRD and SOP IEC”. However, the NRIS leaves its details unclear.

The NRIS or its action plan should describe the planned “separate financial mechanism” in more details. It should be in line with the common basic principles, including aiming for the mainstream and explicit but not exclusive targeting.

- We have to highlight that according to our assessment of the four NRIS, the Romanian NRIS has the least ambition to describe the situation of the Roma, analyze its reasons, and commit itself to bridge the gap between the Roma and the general population. This is a reason for calling for the revision of the NRIS rather than just the adoption of an action plan.

Bulgaria

- The NRIS has very limited information on using EU funds for Roma inclusion, which makes it difficult to formulate country-specific comments. However, all the general comments listed above are valid also for Bulgaria.

BULGARIA

- 1) **Description of the current situation:** The description of the current situation of Roma in the given Member State should include the geographical distribution (mentioning regions, cities, localities); estimates of the Roma population on their territory; description of the socio-economic challenges of Roma with particular attention to the four key areas: education, employment, housing, healthcare, and any other specific issues deemed important within the given national context.

- **To what extent does the NRIS meet this criterion?**

The Strategy does not provide an adequate description of the current situation because i) data is minimal; ii) systemic factors for social exclusion of Roma such as segregated education are not identified; iii) there is no analysis of the good and bad practice in Roma inclusion programs from previous years. This inadequate identification of the problems has affected the formulation of strategic goals and concrete measures. The Strategy and the Action Plan reveal unawareness and/or no intention on the part of the government to tackle crucial issues for the integration of Roma in each of the 4 priority areas defined by the EC.

The NRIS does not fully meet the above mentioned criterion, the information provided in the section “Actual situation of Roma community” was generated primarily from data collected during the 2011 national census. There is no information about the situation of Roma within regions, cities and localities. There is only one sentence referring to the geographical distribution of Roma: “The largest share of Roma is in Montana district – 12.7% and Sliven – 11.8%, followed by Dobrich – 8.8%, Yambol – 8.5%. The Roma population is estimated as 4.9% of the total population, based on information from the 2011 census).

- **Does this description include relevant concrete indicators (i.e., for education, number of school age Romani children, number and percentage enrolled, number and percentage in special education)?**

The NRIS contains no relevant or concrete indicators for education, number of school age Roma children, number and percentage of Roma children enrolled in school and number and percentage of Roma children in special education there are none in the NRIS.

- **Identify where information is wrong or incomplete**

The statement in the subsection Education in section ‘Actual Information of Roma’ which states that Roma men exercise extreme control over Roma women and girls to prevent school attendance is wrong. There is a lack of concrete indicators for education concerning needs and attainments of Roma in Bulgaria. The statements made in this section seem to be based on assumptions without supporting evidence.

In the section concerning health care, 'genetic diseases' are described as one of the primary factors determining the health status of Roma. This assertion was considered discriminatory by the reviewer and one made without any supporting evidence. There was also a claim

that, according to research, 12.6 % of the entire Roma population is either invalids or suffering from chronic diseases. No sources are provided for this information is anywhere in the text.

- **Identify any contentious issues in the analysis or interpretation of the current situation**

The stated aim of the Strategy is to implement policies for social integration of Roma. Civil society stakeholders repeatedly contested the interpretation that the issue is simply that Roma must be 'socially integrated' and the wider perception that Roma are considered to be a social problem.

2) **National goals:** The section should define the national goals and of how they fit into the Roma integration goals defined by the EU Framework. These goals are expected to cover at least the four crucial areas of education, employment, healthcare and housing in order to close the gap between marginalised Roma communities and the majority population, but Member States can add other goals relevant to their specific national context, and to define also intermediate steps. An integrated approach combining actions in a variety of policy areas is strongly recommended. The timeline is 2020.

- **To what extent does the set of national goals in the NRIS match those defined by the EU Framework?**

The national goals follow closely the goals set by the EU Framework.

- **To what extent are the goals articulated in terms of concrete indicators (e.g., for education, a specific targeted annual increase in the number and percentage of Romani children completing secondary school)**

The national goals are not articulated in terms of concrete indicators for the four priority areas. Those indicators mentioned in the action plan in the different areas are inadequate.

- **To what extent do the goals cover the 4 priority areas with a view to 'closing the gap between marginalized Roma communities and the majority population'?**

To a large extent the goals of the national strategy aim to close the gap between marginalised communities and the majority population. However, the goals envisaged to combat discrimination in access to public life and services in Bulgaria are insignificant. These should be the first steps in any integration policy aiming at closing the gap between the Roma and majority populations.

- **Has the government added other goals relevant to the specific national context? If so, how relevant are these goals? Are there any other goals that should be added?**

The government has added other goals that are relevant to the national context – media outreach, the preservation of Roma culture, the rule of law and antidiscrimination. These

additional goals however are only vaguely elaborated. It is unclear what mechanisms for implementation will be applied, or how these goals will be monitored.

- **To what extent do the national goals represent an integrated approach on a 2020 timeline?**

As the strategy stipulates in its preamble, it applies a “targeted integrated approach to citizens in vulnerable situation from Roma origin, that is applied within the framework of the common strategy to combat poverty and exclusion and does not exclude the provision of support to persons in disadvantaged situation from other ethnic groups”. (p.1) However, as these goals have been developed it is not clear how they represent a coherent integrated approach within a broader policy context to Roma inclusion on a 2020 timeline.

- 3) **Action plan:** This section should include a clear action plan identifying concrete measures in at least the areas of education, employment, healthcare and housing, aiming to improve Roma integration, accompanied by a corresponding time schedule and adequate funding. The action plan should be directly related to the aim of achieving the national goals. Each measure/action should be accompanied by an indication of the funding and of the sources (national funds, EU funds). The references to EU funds (measures and amounts) should be compatible with the content of the national operational programmes for the structural funds. In addition, other aspects to be taken into consideration when reference is made to the EU funds are: the use of housing interventions under the amended ERDF Regulation; the use of technical assistance to improve the management, monitoring and evaluation capacities of Roma-targeted projects; how and to what extent are global grants used; how the European Progress Microfinance Facility is used.

- **How ‘clear’ is the Action Plan in identifying concrete measures in the 4 priority areas? Is there a time schedule? How coherently does the Action Plan directly relate to the aim of achieving the national goals?**

The action plan refers to two time periods: the first 2012- 14; and the second 2014-2020. The government's justification for this is twofold: the existence of the Decade of Roma Inclusion National Action Plan that has been approved and is still under implementation, where key goals and measures relate to the existing needs of the Roma community; and second because the first period of implementing the OP will be finalised in 2013, while the new programming period for EU funding will start as of 2014 and will last until 2020.

The action plan only details activities that will be implemented within the first period 2012-2014.

In terms of clarity, the action plan identifies clear and concrete measures in the 4 priority areas. The timelines envisaged are too often, too vague and lacking in specifics. For example, prevention of school dropouts, an activity that is to be implemented in the two-year period 2012-14 is lacking in concrete indicators. The indicators provided for this particular activity are ‘the development of a monitoring system and approved methodology.’

There is a shortfall in terms of coherence because the action plan was actually designed with a view towards implementation of the Decade of Roma Inclusion. However, as the Framework priorities so closely resemble those of the Decade, most of the goals comply with those outlined in the Framework for National Roma Integration Strategies.

The measures in the Action Plan do not address root causes of exclusion of Roma in several fields.

In education, proposed measures do not address segregated education. The Strategy does not identify segregated education as a major obstacle for equal education opportunity and does not envisage measures to eliminate segregated education. Some measures are aimed at reducing the number of children in segregated kindergartens, but there are no measures to desegregate primary and secondary schools which are the most important obstacle for Roma to access equal education opportunities. These omissions are hard to explain given that ALL strategic documents adopted by Bulgarian governments since 1999, including documents adopted by the current government in 2010, highlight the problem of segregated education and include measures to address it.

There are no measures for support of Roma to pursue higher education careers. Despite the fact that the EC Framework does not require governments to act in this field, in Bulgaria, previous strategic documents have identified promotion of higher education among Roma as a necessary measure contributing to the overall development of the communities. The present Strategy lacks continuity in this respect.

In health care, exclusion from health insurance is not addressed in the Action Plan; creating healthy living conditions in Roma neighbourhoods is not addressed either. These two issues are missing from the Strategy, despite the fact that in 2008 the European Committee for Social Rights found Bulgarian state in violation of the European Social Charter precisely due to “failure of the authorities to take appropriate measures to address the health problems faced by Roma communities stemming from their often unhealthy living conditions” and due to “difficult access to health services - the medical services available for poor or socially vulnerable persons who have lost entitlement to social assistance”. See Resolution by the Committee of Ministers of the Council of Europe, at:

<https://wcd.coe.int/ViewDoc.jsp?id=1607385&Site=CM&BackColorInternet=C3C3C3&BackColorIntranet=EDB021&BackColorLogged=F5D383>

In housing, the Action Plan fails to provide measures to tackle a key structural problem such as the prevalence of housing which is not legalised by the authorised national authorities. Unlike previous strategic documents, the Strategy does not envisage measures for legalisation of Roma housing, despite the fact that in 2006 Bulgaria was found in violation of the European Social Charter due to, among others “the lack of security of tenure” for Roma housing. See Resolution by the Council of Europe Committee of Ministers,

<https://wcd.coe.int/ViewDoc.jsp?id=1180705&Site=CM&BackColorInternet=C3C3C3&BackColorIntranet=EDB021&BackColorLogged=F5D383>

Lack of proper authorisation for the construction of housing, respectively lack of ownership documents, prevents Roma from obtaining IDs because a recent amendment to the Law on Personal Documents requires persons to provide such documents in order to be issued an ID.

In employment, the measures in the Action Plan do not match the strategic goals. For example, goal 6 “Development of legal and economic mechanisms to stimulate employers to employ Roma” is not matched by any concrete measures. In general, the measures do not envisage provision of employment opportunities for unemployed Roma, other than the public works programs. Most of the measures deal with professional qualification, counselling, motivation.

- **Which measures are accompanied by an indication of specific levels of funding and identified sources (national/EU funds)? Are these funding levels adequate?**

Indications of specific levels of funding are not available, while resources are identified. However, at this stage, it is difficult to evaluate whether the funding levels will be adequate. An example in this regard is the activity 4.2: Provision of conditions for maximum enrolment and early adaptation in the system of preschool education. For the implementation of this activity, the government states that it will use 'part of a 40 million Euro loan from EBRD'. Another example is those activities that have to be funded from within local municipality budgets. There are no concrete indications of the amounts required from local budgets.

By contrast, in the same action plan, the Ministry for Health has developed a clearly costed financial plan for priority Health provision, with concrete figures and timeline. This was developed within the implementation of the Decade of Roma Inclusion National Action Plan (pp. 30-33).

- **To what extent are the references to EU funds compatible with the considerations mentioned above?**

It is to be noted that there are no concrete indications in terms of financial allocations within EU funds. The Action plan makes reference to availability of measures within the Operational Programs, however it makes no reference to the availability of funding under the modification of art. 7(2) of the ERDF regulation, funding which can be used to improve housing and infrastructure for marginalized communities including Roma. Most of the activities in terms of housing are delegated to municipal budgets, an approach which, the reviewer asserts, is doomed to be ineffective.

- 4) **Horizontal aspects:** The sections addressing the goals and the action plan should indicate how the goals, the actions, the funding and the outcomes fit into the wider context of the EU 2020 Strategy, national reform programmes, but also in the context of their own inclusion policies. The compliance with the **10 Common Basic Principles for Roma Inclusion** (e.g. attention to the gender dimension, promotion of intercultural aspects, involvement of Roma, etc.) should also be explained. In those Member States where promoting Roma inclusion is integrated in the general

inclusion policies, the document should indicate how specifically the integrated sets of policy measures has impact on the Roma community.

- **What indications are there that the goals and action plan fit into the wider policy context outlined above?**

There are no specific indications how the goals and action plan will fit within the general policy context. On page 10 it is stipulated that the national strategy will integrate all rights, obligations, needs and problems of Roma in the general governmental and sectorial policies by applying a mainstreaming approach for guaranteeing effective equality in access to major public spheres. No more than that.

- **To what extent does the NRIS comply with the 10 Common Basic Principles (annexed)?**

The strategy on p. 10 states that the 10 Common Basic Principles are taken in consideration for the formulation, implementation, observation and evaluation of integration policies for Roma. However, detailed provision on concrete policies and implementation in practice is not available. It is a cause for concern that two of the principles are not clearly developed within the strategy: aiming for the mainstream and the intercultural approach.

For example, 'Aiming for the Mainstream' is not reflected in the measures in education because the envisaged measures do not tackle the problem of segregated education. Also there is no indication in the Strategy that any of the measures are based on "Transfer of evidence-based policies".

5) **Governance mechanisms:** This section should explain how the regional and local authorities were consulted and what role they will play in implementing the strategies/policies. It should also indicate how the civil society (including Roma NGOs), social partners and other stakeholders (e.g. educational bodies, associations etc.) have been involved in the design and will be involved in the implementation and monitoring of national strategies or sets of policy measures.

- **With reference to Principle No. 8: What degree of consultation took place with regional and local authorities? What roles does the NRIS indicate for these authorities in implementing the strategies?**

Regarding Principle 8, a wide public consultation process took place. The institution responsible for the design and elaboration of the National Roma strategy organized regional and local consultations with the participation of civil society organizations as well as local and regional authorities. Comments and recommendations were taken in consideration during the drafting process.

Unfortunately the NRIS does not explicitly oblige the regional and local authorities to take an active part in the implementation of the strategy. It does delegate responsibilities to local authorities within the Action Plan, however without any indication of concrete financial commitments. In the section for the Mechanisms for implementation of the integration policy the government recommends that the local authorities develop local action plans for

the implementation of NRIS. However, these are soft recommendations without any mandatory or binding character.

- **With reference to Principles Nos. 9 and 10: Describe the process of consultation and engagement with civil society and Roma stakeholders and experts. Assess the quality of Roma participation and civil society consultation in the drafting, dissemination and discussion of the NRIS.**

The NRIS was designed and drafted with the active participation of Roma experts and civil society stakeholders. In the reviewer's opinion, much of the content of the proposals elaborated by the Roma experts and civil society were not incorporated into the strategy, because the relevant governmental institutions, including the Ministries of Education and Health had to revise all proposals and adapt them to their vision for the implementation of the Strategy. While the Roma stakeholders had the chance to actively participate in the discussion, their disappointment was very evident in that the final Action Plan approved by the Council of Ministers lacked clear financial commitments. In addition, the willingness of the Roma civil society organizations to participate was driven by a desire to see a clear political will for participatory 'bottom-up' implementation of the strategy, and a clearly articulated distinction of roles and responsibilities allocated to the relevant institutions at both national and local level.

- 6) **Monitoring the implementation of the strategies/policy measures and adjusting them in time:** This section should describe the domestic monitoring methods and mechanisms to self-evaluate the impact of national strategies or sets of policy measures. It should also describe the review mechanisms to ensure that the strategy remains flexible and adapted to the changing circumstances.

- **Assess the adequacy of monitoring methods and mechanisms outlined above.**

One of the main weaknesses of the NRIS in Bulgaria is the lack of monitoring methods and mechanisms. It provides only the possibility for the so called "administrative monitoring". The latter is a subject of annual report by each and every institution engaged in the process of implementation. Our experience up to date is evident that these reports are prepared without any methodology for evaluation, lack of concrete indicators and mechanisms for collecting information related to outcomes of the integration policies.

- **Does the government collect and disseminate adequate disaggregated data to measure progress on integration? If not, what indication does the NRIS contain concerning plans to do so between now and 2020?**

The greatest weakness of the current and previous integration policies conducted by the national governments in Bulgaria is the lack of mechanisms for collecting and disseminating disaggregated data. The only available instrument for official data collection is the national census, which does not provide whatsoever data regarding Roma integration policies. Evidently there are number of civil society organizations that provide data on the different priorities, however in most cases the data and methodologies applied are disputable.

7) **Details of the National Contact Point:** The document should indicate the contact point (including contact details) and its mandate to coordinate the development and implementation of the strategy/policies.

- **What is the structure and mandate of the National Contact Point? Is the resource allocation to the NCP proportionate to the task of coordinating the development and implementation of the NRIS?**

The current NRIS includes information on the National contact point including contact details; however it does not contain information regarding its mandate to coordinate the development and implementation of this particular strategy.

Otherwise the National Council for Cooperation on Ethnic and Integration Issues is the administrative unit responsible for the implementation of the NRIS, as well as the Action plan of the Decade of Roma Inclusion.

In the opinion of the reviewer, the above mentioned unit has neither the necessary capacity nor experience to coordinate and implement Roma integration policies. It needs additional technical assistance in order to coordinate, develop and implement effective integration policies. At this point there is only one Roma member of the team, this is far from sufficient.

INDICATIVE LISTING: Below is an 'indicative listing' of the potential measures which can be considered in the four priority areas of education, employment, health, and housing.

Key:

✓ = included in NRIS, ½ = included in NRIS but not clear enough, ✗ = not included in NRIS

EDUCATION measures directed at:

- Preventing discrimination or segregation of Roma children at school
- Providing Roma children with sustainable access to quality education
- ✗ Widening the access to quality early childhood education and care
- ✗ Completion of primary education by all Roma children
- ✓ Reducing the number of early school leavers from primary and secondary education
- ✗ Increasing Roma youngsters' participation in tertiary education
- ✗ Increasing the use of innovative educational approaches such as ICT-based access to learning and skills.

EMPLOYMENT measures directed at:

- ✓ Providing non-discriminatory access for Roma to vocational training, to the job market and to self-employment tools and initiatives
- ✗ Providing access to micro-credit
- ✗ Employing Roma civil servants in the public sector
- ✗ Employment Services to reach out to Roma by providing personalised services and mediation
- ✓ Attracting more Roma on the labour market (involvement of the social partners/business associations etc.?)

ACCESS TO HEALTHCARE measures directed at:

- ✓ Providing access to quality healthcare, with particular attention to women and children
- ✓ Providing access to Roma to preventive care and social services
- ✓ Involving qualified Roma in healthcare programs (role of mediators)

ACCESS TO HOUSING AND ESSENTIAL SERVICES via measures directed at:

- ✓ Providing non-discriminatory access to housing, including social housing
- ✗ Implementing an integrated approach, of which housing intervention is part of
- ✗ Addressing the special needs of non-sedentary Roma population, where applicable
- ✗ Providing details of the means of involvement of regional and/or local authorities as well as local Roma and non-Roma communities

CZECH REPUBLIC

Note: Following the Commission's Framework Communication, the Czech Government did not devise a new National Roma Integration Strategy. As reported in the *Prague Monitor*, Environment Minister Thomas Chalupa explained that The Czech government's *Concept of Romany Integration for 2010-2013* includes the EC's demands: "At present, the Czech Republic has a well-developed national coordination mechanism relating to the Romany agency. It is neither desirable nor useful to create new tasks for ministries, especially at the time of budget austerity."¹The government submitted two of the three existing strategic papers on Roma inclusion reviewed in this document. The third document '*Strategy for the Fight against Social Exclusion for 2011-15*' was not submitted to the European Commission. This is a matter of regret, as the reviewer described this document as 'the best constructed political plan so far: despite its shortcomings, its implementation could significantly improve the position of Roma in Czech society'. The fate of the '*Strategy for the Fight against Social Exclusion for 2011-15*' remains an open question. The reviews of the Czech strategies were compiled by Filip Rameš, OSF Prague and Štěpán Ripka, Charles University, Prague.

2010 – 2013 ROMA INTEGRATION CONCEPT

The 2010-13 Roma Integration Concept is an update of the previous Roma Integration Concept from 2005 and 2004, thus tying in to the long-term conceptual work of the Council of the Government of the Czech Republic for Roma Community Affairs (RVZRM) for integration of Roma. The concept represents a relatively comprehensive approach to increasing the integration of socially excluded members of the Roma minority in the Czech Republic. It approaches the issue holistically and views integration as a pluralistic and dynamic process. It elaborates a number of goals into concrete measures using the budget of the Agency for Social Inclusion's newly created Strategy for the Fight against Social Exclusion for 2011 – 2015. This strategy also expands the target group to include all disadvantaged persons living in or at risk of social exclusion.

A weak point of the Concept is the absence of budgets for individual measures and indicators of their impact. Monitoring of implementation thus speaks to the fulfilment of individual tasks, but not to the actual impact on the life of the Roma minority. The concept should contain more close integration with the European framework for Roma integration. Another weak point of the concept is the weak mandate of its guarantor, the RVZRM, which does not allow it to force realisation of measures or issue sanctions for failure to implement them. The reduced budget and insufficient capacity of this office also considerably limits its ability to operate. The Czech Government should thoroughly enforce the implementation of Concept measures by their individual guarantors, strengthen the mandate of the RVZRM and support the institutionalisation of the Agency for Social Inclusion.

¹<http://praguemonitor.com/2011/08/05/senate-refuses-comply-call-ec-revise-national-roma-inclusion-strategy>

1) Description of the current situation:

The Concept does not contain a comprehensive description of the situation of Roma in the Czech Republic. A very brief and general outline of the situation of Roma is contained in the individual chapters (Roma language, education, employment, excess debt, housing, social protection, health care, safety). It does not contain any specific data, numbers or geographic distribution. The Concept does not provide an in-depth analysis of the causes of socioeconomic disadvantage, which is mentioned only in passing without specific data. There is primarily only reference to studies carried out by various ministries, the World Bank (2008) and other unspecified research. Only a minimum of attention is given to data from the non-profit or private sector.

- **Does this description include relevant concrete indicators?**

The Concept does not contain any quantifiable indicators relevant to the target group in any of the chapters. Only in the area of education does the document refer to two studies by the Ministry of Education, but it does not work with freely accessible statistics or studies carried out by the private or non-profit sector whatsoever.

In the chapter on employment, only the percentages published by a World Bank study from 2008 are given. None of the other chapters (excess debt, housing, social protection, health care, safety) contain so much as an estimated percentage. Some of the proposed systemic measures can be considered indicators of fulfilment of the Concept's implementation plan, but not of the impact on the target group.

- **Identify where information is wrong or incomplete.**

In the section on education, estimates are given from the aforementioned studies on the percentage of Roma students in pre-school education, at mainstream and special stream primary schools and peripherally also the percentage of Roma students who move on to secondary education. The percentages are not accompanied by concrete numbers.

The chapter on housing is altogether too brief and perfunctory. There are no estimates of the number of Roma living in socially excluded areas at all, nor are there locations and descriptions of these areas. The identification and description of problems is also insufficient.

On the positive side, there was specific mention that the low level of rights awareness among Roma led to abuses and their being deliberately disadvantaged by private and public entities.

It is starkly obvious that the topic of health and health care remains one of the least investigated aspects of the situation of socially excluded Roma in the Czech Republic. The only source the authors of the document make reference to is the internationally implemented Sastipen study. For some unknown reason the Council of the Government does not utilize the data generated from studies in which it either took part directly or which it helped launch.

- **Identify any contentious issues in the analysis or interpretation of the current situation**

The range of integration tools proffered by the concept is highly passive toward the Roma minority. No space is made in the document for active involvement or participation of Roma themselves in resolving the various challenges; rather it outlines systemically oriented measures by the majority society.

The Concept does not deal at all with the issue of the lack of ethnically disaggregated data. It completely leaves out a description and critical evaluation of State subsidies and funding from European structural funds and their impact on the actual life of Roma in various areas.

2) **National goals**

- **To what extent does the set of national goals in the NRIS match those defined by the EU Framework?**

The goals comply with those defined by the EU Framework, specified and expanded upon in the national context. The national goals are broken down very well and in detail. The Concept has three levels of goals. The main goal is "achieving conflict-free coexistence between Roma communities and the rest of society". This main goal is broken down into six sub-priorities:

1. creating a tolerant environment
2. removing external barriers to incorporation
3. assisting in removing internal barriers to incorporation
4. improving the social status of members of Roma communities
5. developing and integrating Romani culture and language into the majority culture of Czech society
6. ensuring safety

- **To what extent are the goals articulated in terms of concrete indicators (e.g., for education, a specific targeted annual increase in the number and percentage of Romani children completing secondary school)**

A more detailed breakdown of the goals is contained in the individual priority areas² identifying specific measures for meeting them and who is to be responsible. Though the Concept indicates draft measures for meeting individual goals, it does not identify indicators for measuring their fulfilment or impact.

- **To what extent do the goals cover the 4 priority areas with a view to 'closing the gap between marginalized Roma communities and the majority population'?**

In the field of education the Concept promotes integrating Roma children into the main education stream and increasing the level of their education to that of the majority society.

²Romani language, education, employment, excess debt, housing, social protection, health care, safety

In terms of employment, the goals are consistent with evening out opportunities on the labour market and stopping discrimination. In the area of housing, the Concept clearly states the goal of preventing the spread of socially excluded Roma locales and reducing discrimination against Roma on the housing market. The priority of health and health care is the only one that is focused more unilaterally as there are no relevant data mapping out the differences in provision of health care to members of the Roma minority.

- **Has the government added other goals relevant to the specific national context? If so, how relevant are these goals? Are there any other goals that should be added?**

The Concept contains a whole range of other goals in the areas of Romani language and culture, excess debt, social protection and safety. All the priority areas are based on the real national context and set their goals quite fittingly and realistically.

- **To what extent do the national goals represent an integrated approach on a 2020 timeline?**

The timeline for implementing individual measures is contained in the Implementation Plan of the 2010-13 Roma Integration Concept, which is an annex to the document. The concept is based on the *Principles of the Long-term Roma Integration Concept through 2025* from 2006. As such it is an update of the previous concepts since 2000 and sets priorities and goals on a short-term timeline. For this reason the Concept can propose realistic measures for the short- and medium-term. On the other hand, however, it does not offer long-term 2020 goals with concrete indicators.

3) Action plan

- **How 'clear' is the Action Plan in identifying concrete measures in the 4 priority areas? Is there a time schedule? How coherently does the Action Plan directly relate to the aim of achieving the national goals?**

The Action Plan (Concept Implementation Plan) contains tasks for individual departments and recommendations for other key entities in Roma integration. The Implementation Plan organises the individual tasks for meeting the Concept goals by those who are to implement them – the ministries. Specification of individual tasks is not laid out in detail in the Implementation Plan. Establishing concrete measures is the responsibility of the individual ministries. This is a weak point of the Concept, which does not set clear and definitive conditions for forcing the individual implementers to meet their commitments.^{3,4}

³E.g., The Ministry of Education has the task of increasing the permeability of the education system (point 3.7). It is not however laid out by what steps this is to be achieved.

⁴ In the area of the education the Concept does not set the goal of having all Roma children complete at least primary education, but to "increase the number of Roma students in the main educational stream". The authors are evidently operating under the assumption that all Roma children successfully complete primary education, which is not empirically founded.

- **Which measures are accompanied by an indication of specific levels of funding and identified sources (national/EU funds)? Are these funding levels adequate?**

Neither the Concept nor the Implementation Plan contain a budget for either the individual tasks or the whole. The sources of funding for supporting realisation of these tasks are insufficiently indicated. Both Action Plan and Concept mention only the need to create new or expand existing subsidy programmes for some goals and tasks, but the scope is not stated. Neither the Concept nor the Action Plan contains concrete references to EU structural funds, such as the European Regional Development Fund (ERDF) and amendment of Article 7.

- **To what extent are the references to EU funds compatible with the considerations mentioned above?**

There is a lack of any reference to the use of technical assistance, or of monitoring and evaluating the existing grant headings in relation to the Roma minority. Neither the Concept nor the Action Plan presents a clear guide for monitoring and evaluating integration mechanisms. Implementation and monitoring fulfilment of individual tasks runs up against the legislative limits to the powers of the Government Council for Roma Community Affairs⁵, which does not have sufficient jurisdiction in relation to the ministries, regions and municipalities. The fact that the individual tasks are not specified in terms of content affords regions and municipalities a large degree of benevolence in how to carry out the tasks and makes it impossible to establish proper indicators.⁶

For a number of interdepartmental tasks, the Action Plan works with the existence of a Minister for Human Rights, a post which was done away with in March 2010. This agenda is now administered by the Government Commissioner for Human Rights, who has reduced powers.

4) Horizontal aspects

- **What indications are there that the goals and action plan fit into the wider policy context outlined above?**

The 2010-13 Roma Integration Concept is an update of the previous Roma Integration Concept from 2005 and 2004. It thus ties in to the long-term conceptual work of the Council of the Government of the Czech Republic for Roma Community Affairs (RVZRM) on integration of Roma. It is also closely tied to the State's overall policy toward integration of socially excluded persons and areas. The main referential frameworks remain the Constitution of the Czech Republic, the Charter of Fundamental Rights and Basic Freedoms and the international treaties by which the Czech Republic is bound. The Concept aims to achieve better cohesion and coordination of activities by key bodies working on Roma integration at the national and local level. One of the partner projects is the Agency for

⁵The Government Council for Roma Community Affairs is the interdepartmental authority coordinating implementation of the Concept and at the same time its author.

⁶ The Concept proposes carrying out suitable legislative changes to the content definition of the tasks (Act No. 273/2001 Coll.).

Social Inclusion in Roma Localities, which was created under the Office of the Government in 2008.

- **To what extent does the NRIS comply with the 10 Common Basic Principles (annexed)?**

Even without explicit reference to the 10 Common Basic Principles for Roma Inclusion, the Concept complies with all the principles. The Concept above all takes into account the socially excluded Roma population, which it breaks down into vulnerable groups by sex, disability, sexual orientation, age, religion or nationality.

The only principle that the Concept only takes into account partially is Principle 7 – Use of Community instruments. In essence, the Concept does not contain references to the EU legislative and political framework. There is a complete lack of monitoring and evaluation of the use of EU instruments in general. The Concept also lacks any reference to the EURoma network.

5) Governance mechanisms

- **With reference to Principle No. 8: What degree of consultation took place with regional and local authorities? What roles does the NRIS indicate for these authorities in implementing the strategies?**

Regional coordinators for Roma affairs actively took part in updating the Concept on behalf of the regional authorities, having had the opportunity to provide comments on the material. The Concept was further consulted over the course of preparations at various opportunities under the Government Council Committees (the Decade Committee and the Committee for Local Government and Conception of Roma Integration – committee members include representatives of both the Roma and local governments). The actual scope of their intervention is, however, unclear. The Implementation Plan calls on regional authorities to provide ongoing support to integration policies, to stimulate them with grant programmes, to make partnerships and to increase the awareness of partners. Other recommendations relate to the fields of education, employment and safety. On the basis of these recommendations, municipalities should monitor the situation in their jurisdiction, identify and prevent the further marginalisation of vulnerable groups and reflect their needs in developing social services, regulate the system for awarding municipally owned flats and work with the Police of the Czech Republic to ensure safety.

- **With reference to Principles Nos. 9 and 10: Describe the process of consultation and engagement with civil society and Roma stakeholders and experts. Assess the quality of Roma participation and civil society consultation in the drafting, dissemination and discussion of the NRIS.**

The current form of the Concept comes out of the long debate between the Office of the Government of the Czech Republic and Roma representatives, both from the Government Council for Roma Community Affairs and its committees, as well as non-members and experts. It is also an updated form of the Concept from previous years. The Concept was commented upon in a separate procedure by the members of the Government Council for

Roma Community Affairs, which contains representatives of civil society, Roma and non-Roma non-profit organisations, Roma activists, experts and others.

6) Monitoring the implementation of the strategies/policy measures and adjusting them in time

On the basis of a Czech Government Resolution, the *Government Council for Roma Community Affairs* puts together a Report on the State of the Roma Minority in the Czech Republic⁷ every year in cooperation with the *Government Council for National Minorities*. This extensive report is a compilation of information from individual ministries, regional authorities, municipalities, relevant institutions, and the non-profit and academic sectors. The report "follows the development of the situation of Roma in the Czech Republic, the success of Roma integration policy measures, legislative and institutional changes and their impact on the lives of Roma; it identifies examples of good practice and future risks to Roma inclusion."

In individual chapters the report takes on a detailed description of the situation at the expense of a critical evaluation of the level to which individual goals have been met and adequate solutions proposed. The Report on the State of the Roma Minority can only partially be considered a tool for monitoring the Roma Integration Concept, in a general sense. As the Roma Integration Concept also does not contain any concrete indicators measurable in time, the Report lacks any evaluation of their fulfilment.

- **Does the government collect and disseminate adequate disaggregated data to measure progress on integration? If not, what indication does the NRIS contain concerning plans to do so between now and 2020?**

At the current time the Czech Republic does not collect ethnically disaggregated data. The Roma Integration Concept does not explicitly consider the absence of such data a shortcoming in the system and in this regard does not proffer any remedy.

7) Details of the National Contact Point

As the Roma Integration Concept was formulated before the task of drawing up an NRIS was assigned, no Contact Point is indicated in it. The primary author of the Concept was the Governmental Council for Roma Community Affairs, thus it can be assumed that this advisory body to the Office of the Government will also be the main Contact Point.

The mandate of the Government Council for Roma Community Affairs was strengthened in 2010 with a change to its statute expanding its ranks to include the Prime Minister and the ministers of the individual ministries, representatives of the Association of Regions of the Czech Republic and instituting closer cooperation with the Agency for Social Inclusion in Roma Localities. Despite this, the Council's mandate remains relatively weak. The

⁷Since 2009 the report has also included the Report on Fulfilment of the Decade of Roma Inclusion and "Information on fulfilment of government resolutions related to inclusion of Roma communities and an active approach by State authorities in implementing measures adopted by related government resolutions as of 31 December 2009".

Government Council is not an authority that could enforce fulfilment of individual measures and potentially issue sanctions for failure to do so. In March 2010, the post of Minister for Human Rights was eliminated after three years. Since then the human rights agenda has once again fallen under the jurisdiction of the Commissioner for Human Rights.

Due to austerity measures in the government budget, 2010 also saw jobs and the budget of this body cut back. The result is a considerably limited capacity, which in some regards has had a paralysing effect. The Government Council for Roma Community Affairs is and for the near future will be limited to a consultative and reporting role, with no aspirations to coordinate activities or oversee their implementation.

INDICATIVE LISTING

Key:

✓ = included in Concept, ½ = included in Concept but not clear enough, ✗ = not included in Concept

EDUCATION

- ✓ Preventing discrimination or segregation of Roma children at school
- ✓ Providing Roma children with sustainable access to quality education
- ✓ Widening the access to quality early childhood education and care
- ✗ Completion of primary education by all Roma children
- ✓ Reducing the number of early school leavers from primary and secondary education
- ✓ Increasing Roma youngsters' participation in tertiary education
- ✗ Increasing the use of innovative educational approaches such as ICT-based access to learning and skills

EMPLOYMENT

- ✓ Providing non-discriminatory access for Roma to vocational training, to the job market and to self-employment tools and initiatives
- ✗ Providing access to micro-credit
- ✓ Employing Roma civil servants in the public sector
- ✓ Employment Services to reach out to Roma by providing personalised services and mediation
- ✓ Attracting more Roma on the labour market (involvement of the social partners/business associations etc.?)

ACCESS TO HEALTHCARE

- ✗ Providing access to quality healthcare, with particular attention to women and children
- ✗ Providing access to Roma to preventive care and social services
- ✗ Involving qualified Roma in healthcare programs (role of mediators)

ACCESS TO HOUSING AND ESSENTIAL SERVICES

- ✓ Providing non-discriminatory access to housing, including social housing
- ✓ Implementing an integrated approach, of which housing intervention is part of

- ½ Providing details of the means of involvement of regional and/or local authorities as well as local Roma and non-Roma communities; (partially – less information on the means of involvement of regional authorities)

Addressing the special needs of non-sedentary Roma population, where applicable
(not applicable)

PRINCIPLES OF THE LONG-TERM ROMA INTEGRATION CONCEPT THROUGH 2025

From 12 April 2006

This government document picks up on the prior update of the Roma Integration Concept from 2005 and places it in a 20-year timeline. The document does not modify the points of departure for the government's policy on inclusion of members of the Roma community, but merely lays out 14 general principles without any distinct description of the situation, goals, action plan, without horizontal aspects, a clear system of monitoring, naming of indicators, a timeline, budget proposals, etc.

Principles:

1. Roma as an integral part of Czech society
2. Rigorous protection of fundamental rights and freedoms (understood to mean civil rights, without any form of discrimination)
3. Roma integration policies are to be in agreement with policies for the protection of rights of minorities
4. Recognition of the multilayer identity of Roma
5. Improvement of the social status of Roma by 2025 so that there is no longer a need for "equalising methods" to compensate their "initial disadvantage"; in key areas of education and the labour market
6. By 2025 to achieve greater representation of Roma in all layers and segments of society
7. Prevention of the deepening social exclusion of Roma and launching tendencies in the opposite direction
8. Maximum involvement of local governments in processes of integrating the Roma minority through financial, organisational and motivational instruments; interconnection between national policy and local level
9. Activation of Roma community members themselves and cooperation with them in formulating integration policies
10. Integration policies prepared and coordinated by the Czech Government Council for Roma Community Affairs and implemented through ministries and other authorities;
11. Support by the non-profit non-governmental sector of members of Roma communities*
12. Thorough monitoring of the situation of Roma communities and evaluation of the success and effectiveness of measures
13. Financing for integration policies should be stable and long-term, coming from the State budget, European structural funds and local government budgets
14. International cooperation in creating integration strategies and concepts

From the point of view of the NRIS, this document is superfluous and already fully incorporated in the 2010-13 Roma Integration Concept. The document brings no significant added value to the table, with the timeline of 2025 being purely formal and theoretical. No commitments or indicators are given in the document.

STRATEGY FOR THE FIGHT AGAINST SOCIAL EXCLUSION FOR 2011 - 2015

Overall evaluation of the document

This strategy is the best constructed political plan so far and its implementation could significantly improve the position of Roma in Czech society, despite all its shortcomings, which are analysed in the following text. This is the first document of its type, containing designation of administrators and co-administrators for individual measures, as well as clear target dates and outlines of financial requirements, and even estimates of the savings from the State budget if the given measures are implemented. According to the statement of the document's coordinator, 70-80 % of all the planned measures were passed in the inter-departmental comment procedure, and more than 100 comments were dealt with. This document is the most specific commitment by the Czech Republic for dealing with the given issue to date, particularly in the fields of education, social services and family policy. In the area of education, implementation would lead to the end of segregation of Roma children into schools intended for the mentally handicapped, which has long been the greatest challenge for the Czech Republic in its treatment of Roma. The measures given in the Strategy could also be used for inspections of the implementation of the ECHR *D.H. and others v. the Czech Republic* ruling if appropriately connected with monitoring of the transfer of Roma students from special schools to mainstream schools.

In contrast with previous concepts, the implementation of individual measures is easily monitorable, though monitoring and evaluation methods are not contained in the Strategy. According to the project coordinator, monitoring will be taken care of by an interdepartmental coordination committee, with the process being overseen by the Agency for Social Inclusion. This unfortunately does not guarantee, however, that the Strategy will truly be taken seriously by the various ministries. It would seem that the Agency does not have the tools to enforce its application.

Target group:

According to the statement of project coordinator Martin Šimáček, the Strategy *"was not conceived as a document in support of integration of a selected ethnic minority, but in general in support of inclusive policies and equal opportunities. The target group is defined according to the civic principle as residents of excluded localities and people at risk of social exclusion, with discrimination on the basis of ethnicity numbering among the fundamental disadvantaged target groups and Roma currently being by far the group most at risk of social exclusion and discrimination in the Czech Republic."*

Genesis of the text

The assignment of putting together a strategy for the fight against social exclusion was originally given by the Czech Ministry of the Interior (from whence the title of the material also comes) in reaction to the unrest/pogrom attempts at the Janov housing estate in Litvínov at the end of 2008. The task of assembling the strategy was originally given to two policy experts, who handed in a social inclusion programme to the government in 2010. This document was labelled "Starting Points of the Strategy for the Fight against Social Exclusion" and was meant to serve as a basis for expert working groups made up of representatives from the public sector, experts and NGOs.

1) Description of the current situation

The Strategy is broken down with a focus on various aspects of social inclusion: safety; housing; social services, family and health; education; employment and welfare systems; regional development. The chapters vary considerably in their scope and ambitions: the greatest emphasis is placed on education, social services and care for at-risk children. The chapter on housing is absolutely disproportionate, receiving a mere eight pages while, for example, the "safety" chapter receives 11 pages and the education chapter 32.

- **To what extent does the NRIS meet this criterion?**

The description of the "starting state" is broken down by the thematic chapters of the Strategy and is oriented by problem. No description of the forms and geographic distribution of socially excluded localities (SEs) is contained within and the general scope of the problem is not specified. There is no estimate of the number of Roma (the strategy is focused on SEs). An analysis of the problems is worked out in detail in individual chapters.

- **Does this description include relevant concrete indicators (i.e., for education, number of school age Romani children, number and percentage enrolled, number and percentage in special education)?**

There are no relevant indicators for the current situation. The fulfilment indicators are not however defined by a quantifiable change, but by individual changes in the processes and settings of the system (including legislative changes), and for this reason they do not require a quantification of the initial state.

- **Identify where information is wrong or incomplete**

In contrast with its predecessor, "Starting Points of the Strategy...", it does not back itself up sufficiently with accessible analyses and statistics.

In the analysis in the chapter on social services, family and health, there is no mention whatsoever of the state of health of Roma/residents of SEs, the (in)accessibility of health care, or discrimination in access to health care. The section on the family does not comment on the highly controversial but still relevant discussion of whether the wider family network

and solidarity among family members in Roma prevents more motivated individuals from upward social mobility or whether it replaces the welfare system in providing a safety net.

The analysis of the issue of housing only mentions in passing the discrimination on the housing market that significantly reduces the chances of finding appropriate housing. It does not at all mention the segregational and racist housing policy of municipalities, who have been pushing Roma out of State and municipally owned flats since the 1990s and into the outskirts of town or undeveloped regions of the Czech Republic where there are substandard housing conditions. This policy also leads to the frequent institutionalisation of Roma children. The analysis of the current situation is also limited to those forms of housing on which the government policy is currently trying to focus, which is rental housing. Support for proprietary housing is omitted.

The chapter on education, in its description of the initial state, does not make any mention of the systematic discrimination against Roma children in access to education. A breakdown of this problem can only be found under two measures, the short-term and medium-term "measures for transformation of the system of schools founded for students with minor mental handicaps", where the results of studies ordered by the Government of the Czech Republic are mentioned: Roma children are overrepresented in the parallel school system intended for mentally handicapped children.

- **Identify any contentious issues in the analysis or interpretation of the current situation**

The first serious problem is the ordering of the chapters, which is not explained anywhere in the text. The reader thus has the feeling that the first chapter (safety) is also the most important area of social inclusion, while the most ambitious and extensive chapters (education; social services, family and health) are left for third and fourth place. This led, for example, to some media taking measures to fight usury as the strategy's main measure because they are contained in the first chapter. The safety chapter deals mainly with criminogenic activities of and toward inhabitants of SELs. The strategy makes note of the problem of SEL inhabitants being labelled as people connected to crime, but the ordering of chapters ends up contributing to this negative image. It is however necessary to acknowledge that the majority of media adopted the government's press releases, which prioritised measures in the field of education (above all the possibility of ordering, but also providing without charge, attendance of pre-schools for children from SELs).

The chapter on employment reproduces a false view of the informal economy in socially excluded localities. It wrongfully describes the residents of SELs as inactive and unmotivated individuals, the vast majority of whom are formally long-term unemployed. It presents the informal economy (alternative living strategies) as a problem against which the State policy must fight instead of taking it as an invitation and starting point for development. In addressing the informal economy it names off "the creation of practical dependence on social welfare, accumulation of debt, and 'under-the-table' work", while completely omitting all forms of collecting (metals, fruit), informal helping out for compensation, labour migration and other forms of subsistence that allow SEL residents to survive in a situation where there is a complete lack of work. Nor does it address discrimination on the labour market.

2) National goals

- **To what extent does the set of national goals in the NRIS match those defined by the EU Framework?**

In the area of education the goals are covered, aside from the explicit goal of "completing primary education". Greater weight is given here to access to quality mainstream education for children from SELs.

The section on employment does not deal at all with discrimination on the labour market. Microfinancing has also been left out here, as has the employment of Roma in the public sector. One measure is proposed whereby a special condition – employing long-term unemployed individuals – would be required for public tenders. Mediation is also proposed of interaction between the Unemployment Office and clients from SELs by a social worker. This worker would ensure better establishment and implementation of individual employment action plans.

The area of health is barely dealt with at all in the strategy. The only proposed goal is improving the accessibility of health care and prevention through health-social workers; the requirement of completed secondary school education presents a significant barrier for Roma taking part in this programme. In terms of access to social services, the Strategy contains a number of sub-goals and measures that are to ensure planning for expansion of social services on the basis of target population needs in the given area. These measures are to improve the coverage of social services in SELs.

The section on housing completely misses the goals defined by the EU framework. In particular there is no provision for non-discriminatory access to housing, no integrated access proposed, no mention of desegregation and the responsibility of regions and municipalities in the housing policy is not addressed at all.

- **To what extent are the goals articulated in terms of concrete indicators (e.g., for education, a specific targeted annual increase in the number and percentage of Romani children completing secondary school)**

The target state is not qualified in any way using indicators. The indicators given for the individual measures are for completion, including an implementation deadline and indication of the administrator and co-administrators; they relate however only to checking whether the given measure has been implemented and not to the impact on the target group.

- **To what extent do the goals cover the 4 priority areas with a view to 'closing the gap between marginalized Roma communities and the majority population'?**

The Strategy has the ambition of "proposing measures that will deal with both the situation of residents in socially excluded localities and the situation of the territory in which the socially excluded locality is found."

- **Has the government added other goals relevant to the specific national context? If so, how relevant are these goals? Are there any other goals that should be added?**

Beyond the framework of the required goals the Strategy contains the goals of safety; social services, family and health; and the goal of regional development. In particular the goal of "social services, family and health" is very important as it contains, for example, a complete transformation of the system for taking care of at-risk children as well as the planning of social services. The safety goals include, aside from the fight against usury, the fight against hate violence. More needed than adding further goals would be more ambitious plans in, for example, the areas of housing and employment.

- **To what extent do the national goals represent an integrated approach on a 2020 timeline?**

The measures and areas in the Strategy comprise a comprehensive intervention. The Strategy is approved for the years 2011 – 2015 with an update to take place for 2016 – 2020 based on an evaluation.

3) Action plan.

- **How 'clear' is the Action Plan in identifying concrete measures in the 4 priority areas? Is there a time schedule? How coherently does the Action Plan directly relate to the aim of achieving the national goals?**

Each area is broken down into priorities which are assigned chapters and sub-chapters of measures. The measures can be legislative, long-term, medium-term or short-term. Each measure contains an indicator of completion, an administrator, co-administrators, a deadline and a financial balance (estimate of the financial requirement and savings incurred by the given measure). Where the problems in the given area were well accented and translated into priorities, the measures are very concrete and tie in to the priorities.

A distinct problem is where the problems identified in the material are not translated into priorities and measures. In the chapter on housing this shortcoming is most marked. The lone concrete measure in this chapter is a pilot project for guaranteed housing, which involves only 60 flats. The lack of a law on social housing that would determine who is responsible for providing and financing housing is the first key problem identified, yet this analysis is not reflected in the priorities and measures: under the measure "Standardisation of State support for social housing" it is merely stated that the "target group" (i.e. presumably inhabitants of SELs) will be "taken into account in a comprehensive treatment of social housing". The fundamental problem remains that no one is responsible for providing suitable housing for people in housing crises, and the Strategy does not address this problem. Two other measures also fail to correspond to the identified problems.

The chapter on employment is a further example of insufficient translation of the identified problems into effective measures: though it states that inhabitants of SELs are not sufficiently motivated to work, it does not consider the option of increasing the minimum wage, which has remained at the same level in the Czech Republic for the past 5 years

already. There is no obligation set for municipalities to ensure performance of public service (see below). It is also problematic that the measures would affect under-the-table workers, but not those who employ them illegally.

The chapters on social services, family and health and the chapter on education are satisfactory in terms of intersection of problems, priorities and measures, but it is possible that the analysis of problems that ended up in the strategy was created after the fact in connection with the proposed measures. This is indicated by the fact that the priorities and their associated measures precisely match the identified problems, yet there are no problems that the current State policy is unable to address as is. In this case however there is no sense in asking about clarity, but rather the quality of the Strategy's analysis of the problems (see above).

- **Which measures are accompanied by an indication of specific levels of funding and identified sources (national/EU funds)? Are these funding levels adequate?**

Nearly every measure is accompanied by an estimate of the funding required as well as an estimate of how much the given measure will save in State budget expenditures. The estimates appear to be adequate.

- **To what extent are the references to EU funds compatible with the considerations mentioned above?**

References to financing measures from EU funds are compatible with the structure of EU operational funds in the Czech Republic.

In the area of housing the use of ERDF funds under the amended regulation is not addressed, in fact not even the existing projects of the Integrated Urban Development Plans financed from the ERDF are listed. The use of resources for technical assistance is mentioned in the document under the measure "support for the creation, expansion and innovation of social services in socially excluded localities", and serves to secure administration of calls under the Operational Programme Human Resources and Employment and the Integrated Operational Programme. The Strategy proposes using a global grant for the "Small Project Fund", which will be meant for projects in the field of social integration up to CZK 1 million (planned) where it is possible to considerably reduce the administrative demands of application and implementation of the project. The Strategy does not propose other use of the global grant.

The Strategy also does not take advantage of the opportunities provided by the European Progress Microfinance Facility and does not deal at all with the possibility of acquiring microloans from EU funds.

4) Horizontal aspects

- **What indications are there that the goals and action plan fit into the wider policy context outlined above?**

At the beginning of the Strategy the individual national documents for social inclusion, Roma integration and the programme of reforms are named and it is stated that the Strategy conforms to these documents. It is not written out in detail how the specific measures fit into these documents. The introduction also states that the Strategy is fully in accordance with the central priorities of the EU 2020 agenda.

There are references in the text to other strategic documents from various ministries and the government, as well as those that are currently being or will soon be put together.

- **To what extent does the NRIS comply with the 10 Common Basic Principles (annexed)?**

Principle No. 1: Constructive, pragmatic and non-discriminatory policies

In general the Strategy is focused on the issue of socially excluded localities; it does not aim to build a parallel system of service for Roma, but rather offers everyone, including Roma, the chance to participate in public services. The Strategy only mentions non-discrimination marginally, specifically in access to pre-schools.

Principle No. 2: Explicit but not exclusive targeting

None of the proposed measures is exclusively for Roma. The strategy explicitly targets only inhabitants of SELs, but mentions a focus on Roma in several places:

In the introduction it makes note of the symbolic exclusion of Roma from public life.

It states that Roma are at risk of violent hate crime.

It makes note of the disproportionate overrepresentation of Roma children in institutional care and specifically proposes searching for Roma foster families and also culturally sensitive approaches to working with families.

In the section on education, which works almost exclusively with the definition "socially excluded students", or sometimes "culturally different students", one measure specifically targeting Roma students is a measure to ensure that Roma children not be disproportionately rejected during registration at the school in their catchment area, or if their parents so desire, to place them in a school outside the SEL catchment area. Two other key measures are for transforming the system of schools for students with minor mental handicaps.

The Strategy also proposes expanding the existing support for Roma secondary school students to all socially disadvantaged students, thereby removing the exclusivity of the State programme.

Principle No. 3: Inter-cultural approach

An inter-cultural approach is not applied in the Strategy whatsoever. The planned government campaign against prejudice and stereotypes was replaced in the Strategy by a campaign against hate violence, with no funding being allocated for this campaign, though a plan is mentioned to apply for funding under the EEA/Norway grant mechanisms.

Principle No. 4: Aiming for the mainstream

This is the point where the strategy is the strongest – although its measures will have an impact above all on socially excluded Roma, it is not exclusive in the target group (defined as inhabitants of SEL) and it tries to ensure their participation in public services. In the fight against segregation it could be more ambitious in some regards though. Although the section on safety is dominated by topic of the fight against usury, which is most interesting for the media, the Strategy's measures also focus on the enforceability of the law and protection of SEL inhabitants. In particular the proposed measures for the area of housing give no hope for desegregation of socially excluded localities. The area of social services, family and health focuses on having SEL inhabitants covered by standard social services. The most prominent move toward the mainstream is in the section on education, which proposes doing away with the separate school system for children with minor mental handicaps. In the future each child is to be educated individually in a mainstream school precisely according to their needs.

Principle No. 5: Awareness of the gender dimension

The Strategy does not address the gender dimension of SEL problems and has no specific vision for women living in SEL. It does not deal with domestic violence, nor with the issue of human trafficking, the victims of which are most frequently women. It does not focus at all on the multifold discrimination against Roma women. It does not contain any specific measures focused on preventing institutionalisation of children from single-mother families. It does not address the accessibility of health care for women from SELs (e.g. particularly during pregnancy). It contains no vision for the employment of women from SELs.

Principle No. 6: Transfer of evidence-based policies

In many of its sources the Strategy is based on experiences from other countries. It relies on good practice conveyed by members of the working groups as well as experiences from pilot locales where the Agency has been operating since 2008.

Principle No. 7: Use of Community instruments

The Strategy primarily makes use of EU financial mechanisms and the EU 2020 vision.

5) Governance mechanisms

In terms of implementation, the overall concept of the Strategy is that the measures are to change the systems managed by the ministries. The administrators of the individual measures are therefore almost exclusively the ministries themselves.

- **With reference to Principle No. 8: What degree of consultation took place with regional and local authorities? What roles does the NRIS indicate for these authorities in implementing the strategies?**

Municipalities are a sovereign and politically very powerful entity in the Czech Republic and it is therefore not possible to force municipalities to implement the Strategy's measures. Municipalities were included in assembling the Strategy through the Union of Towns and Municipalities of the Czech Republic (SMO ČR), both within the working groups while preparing the strategy and as a (voluntary) comment site during the commenting procedure.

According to the project coordinator for the Strategy, SMO ČR representatives dutifully attended all the working group meetings and were always well prepared, but in essence did not contribute anything, merely made sure that municipalities were not assigned any tasks or responsibilities. For example, the SMO ČR has long blocked the clear designation of municipalities as responsible for providing housing to citizens in housing crisis. Municipalities would not take on the obligation to organise so-called "public service", which is a condition for recipients of "material need" payments to draw standard allowances. The social security system thus penalises those who do not perform public service but is unable to ensure that such service is available to be performed. There are a whole range of such examples. Know-how and good practice from municipalities was primarily provided by the Agency from its work in pilot locales when preparing the strategy. The Association of Regions of the Czech Republic was repeatedly invited to help create the Strategy, but its representatives never turned up. Strategy preparations were however attended by specific employees from regional authorities, for example several regional Roma coordinators. The regions are co-administrators of the measures in seven areas, above all in planning and providing social services and for the transformation of the practical schools that they run.

- **With reference to Principles Nos. 9 and 10: Describe the process of consultation and engagement with civil society and Roma stakeholders and experts. Asses the quality of Roma participation and civil society consultation in the drafting, dissemination and discussion of the NRIS.**

Representatives of non-profit NGOs were represented to the tune of at least 20 % in preparing the Strategy, from both large and local NGOs; academics and experts were also members of the working groups. Contributing to dissemination and discussion of the Strategy was, for example, the Czech Helsinki Committee, which organised a colloquium on the material where the Strategy's coordinator appeared, as did other people who contributed to assembling the strategy.

In terms of participation by Roma in drafting the Strategy, this is not mentioned in the Strategy directly, and so we asked its coordinator Martin Šimáček to comment:

“The Strategy is above all focused on modifying the State's administrative policies and systems managed by the various departments. The vast majority of responsibilities for implementing the measures were assigned to the ministries. For this reason the coordination body – the interdepartmental coordination group – contained representatives of all the key ministries, as well as the Government Commissioner for Human Rights and the Agency Director. Aside from them however there was also a member representing the Roma population in the Czech Republic who was chosen for the group not just on the basis of direct experience as a Roma citizen in the Czech Republic, but also due to experience with inclusive policies and above all an ability to formulate the position of elites that are viewed as respectable regardless of ethnicity. This member was Karel Holomek. In him we acquired a constructive opponent who always managed to formulate his comments from the view of the central target group of the whole strategy.

Then in the working groups there were other representatives of Roma populations in the Czech Republic who participate in public administration. There weren't people in the working groups with direct experience of poverty and life in social exclusion; these were involved in drafting the strategy indirectly, through the Agency's local consultants.”

6) Monitoring the implementation of the strategies/policy measures and adjusting them in time:

- **Assess the adequacy of monitoring methods and mechanisms outlined above.**

Implementation is to be monitored by the Agency and also by the coordination group of deputies from the various ministries, which would seem to be adequate as the majority of measures will be carried out at the ministry level. Monitoring of the impact of implementation is not planned. Starting in 2013 work is to begin on updating the strategy for 2015-2020, with extensive discussion in the thematic working groups once again planned, as well as with the public.

- **Does the government collect and disseminate adequate disaggregated data to measure progress on integration? If not, what indication does the NRIS contain concerning plans to do so between now and 2020?**

The Strategy does not contain any plans for the collection of disaggregated ethnic data, nor for the collection of other specific data for monitoring implementation. According to the project coordinator it is possible that the need will arise to monitor the process of transforming the primary school system for students with minor mental handicaps, but this monitoring must be taken care of by the Ministry of Education.

7) Details of the National Contact Point:

- **What is the structure and mandate of the National Contact Point? Is the resource allocation to the NCP proportionate to the task of coordinating the development and implementation of the NRIS?**

The National Contact Point is the Commissioner for Human Rights and National Minorities with the support of the Agency for Social Inclusion and the interdepartmental committee for the Strategy. Currently the NCP does not have any specific allocation for coordinating and developing the Strategy; so far these tasks have been carried out by the Agency staff. For the years 2013-2015 it is planned that monitoring of the Strategy and preparations for updating it will be financed from ESF funding.

INDICATIVE LISTING: Below is an 'indicative listing' of the potential measures which can be considered in the four priority areas of education, employment, health, and housing.

Key:

✓ = included in NRIS, ½ = included in NRIS but not clear enough, ✗ = not included in NRIS

EDUCATION measures directed at:

- ✓ Preventing discrimination or segregation of Roma children at school;
- ✓ Providing Roma children with sustainable access to quality education;
- ✓ Widening the access to quality early childhood education and care;
- ✓ Completion of primary education by all Roma children;
- ✓ Reducing the number of early school leavers from primary and secondary education;
- ✓ Increasing Roma youngsters' participation in tertiary education;
- ✓ Increasing the use of innovative educational approaches such as ICT-based access to learning and skills.

EMPLOYMENT measures directed at:

- ✗ Providing non-discriminatory access for Roma to vocational training, to the job market and to self-employment tools and initiatives;
- ✗ Providing access to micro-credit;
- ✗ Employing Roma civil servants in the public sector;
- ✓ Employment Services to reach out to Roma by providing personalised services and mediation;
- ✓ Attracting more Roma on the labour market (involvement of the social partners/business associations etc.?).

ACCESS TO HEALTHCARE measures directed at:

- ✓ Providing access to quality healthcare, with particular attention to women and children;
- ✓ Providing access to Roma to preventive care and social services;
- ✓ Involving qualified Roma in healthcare programs (role of mediators).

ACCESS TO HOUSING AND ESSENTIAL SERVICES via measures directed at:

- ✘ Providing non-discriminatory access to housing, including social housing
- ✘ Implementing an integrated approach, of which housing intervention is part
- ✘ Addressing the special needs of non-sedentary Roma population, where applicable
(not applicable)
- ✓ Providing details of the means of involvement of regional and/or local authorities as well as local Roma and non-Roma communities.

HUNGARY

Note: This review is partially excerpted from an analysis originally submitted to the Hungarian government when it shared the draft of the NRIS with the Open Society Foundations. This updated review of the final Hungarian NRIS was compiled by Adam Kullmann from the Open Society Foundations' "Making the Most of EU Funds for Roma" initiative.

- 1) Description of the current situation:** The description of the current situation of Roma in the given Member State should include the geographical distribution (mentioning regions, cities, localities); estimates of the Roma population on their territory; description of the socio-economic challenges of Roma with particular attention to the four key areas: education, employment, housing, healthcare, and any other specific issues deemed important within the given national context.

- **To what extent does the NRIS meet this criterion?**

In terms of depth (references), ambition (cataloguing and quantifying the challenges) and sweep (the range of policy areas dealt with) the strategy surpassed expectations. The description of the situation of Roma is rich and nuanced. Important factors mentioned here include the failure of the state to provide equal access to public services and need for systematic solutions; the tendency of programs targeting poor people to benefit the relatively less deprived; the failure of EU funds to have a substantive impact on social inclusion so far; the territorial concentration of multiple levels of deprivation in the least developed micro-regions; etc.

- **Does this description include relevant concrete indicators (i.e., for education, number of school age Romani children, number and percentage enrolled, number and percentage in special education)?**

The chapter on the current situation uses available data, from official databases as well as studies, surveys.

- **Identify where information is wrong or incomplete**

Most important information is neither wrong nor incomplete.

- **Identify any contentious issues in the analysis or interpretation of the current situation**

Statements on integrated education are somewhat contentious. The strategy says: "while integrated education is largely wide-spread on an institutional level, drop-out rates and the study results of students with multiple disadvantages have not improved significantly" (the English version is softer: "...have yet to improve significantly"). By contrast, i) many institutions tried to escape integrated education, and ii) in institutions that implemented integrated education, results of multiply disadvantaged pupils improved, while results of better-off people didn't decline either (see Kézdi-Surányi: A Successful School Integration

Program⁸). One page later the strategy also says: “A study concerning IPS (Integrative Pedagogical System) shows that the programme has led to a general improvement in the development of the pupils/students of the participating schools”.

2) National goals: The section should define the national goals and of how they fit into the Roma integration goals defined by the EU Framework. These goals are expected to cover at least the four crucial areas of education, employment, healthcare and housing in order to close the gap between marginalized Roma communities and the majority population, but Member States can add other goals relevant to their specific national context, and to define also intermediate steps. An integrated approach combining actions in a variety of policy areas is strongly recommended. The timeline is 2020.

- **To what extent does the set of national goals in the NRIS match those defined by the EU Framework?**

The strategy contains goals on the four key areas determined by the EU Framework.

Most problematic areas:

- De-segregation, mentioned in the EU framework concerning education and housing, seems to be a taboo for the government.
- Increasing employment is foreseen mainly by public works instead of the job market or the social economy.
- **To what extent are the goals articulated in terms of concrete indicators (e.g., for education, a specific targeted annual increase in the number and percentage of Romani children completing secondary school)**

There are two types of indicators, but both are problematic.

Targets are defined for education. The targets are not ambitious enough, for although the projected increase in the number of Roma with degrees and diplomas seems impressive, it needs to be set against the anticipated much higher increase in the number of Roma without qualifications.

Targets included in the agreement between the government and the Roma self-government (ORÖ) are ambitious but - in absence of ethnically disaggregated data and baseline data - hardly verifiable.

Thus there is a dearth of verifiable targets. At a minimum, 1-2 targets should be set for early childhood development, employment, health and housing. E.g. the following targets could and should be set:

⁸Available in English:

<http://www.romadecade.org/files/ftp/Successful%20School%20Integration%20Program.pdf>

- for education (besides the above): the increase of the capacities of kindergartens and the decrease of the share of school drop-out rates in the least developed micro-regions;
 - for employment: increase of the number of people employed among people without graduation, and in the least developed micro-regions;
 - for health: decrease of the share of premature birth and infant mortality among mothers without educational qualifications, and in the least developed micro-regions;
 - for housing: increase of the share of social housing or rental flats, decrease of the number of people living in segregated areas.
- **To what extent do the goals cover the 4 priority areas with a view to ‘closing the gap between marginalized Roma communities and the majority population’?**

In the absence of verifiable targets it is not possible to talk about closing the gap.

- **Has the government added other goals relevant to the specific national context? If so, how relevant are these goals? Are there any other goals that should be added?**

The strategy is not just a Roma integration strategy. It has three target groups: extreme poverty, child poverty and Roma. As the three target groups have large overlaps, this is justifiable.

The Roma strategy covers - besides education, employment, health and housing - a fifth sub-chapter with goals on inclusion, attitude change and anti-discrimination. These are relevant to the national context.

One of the most striking and welcome aspects of the strategy is the unambiguous tone and references to the principle of inclusion as a complex two-sided social process that must engage the majority as well as the minority. The strategy mentions the importance of changing negative attitudes, and rightly warns of the dangers of poorly-conceived campaigns backfiring. It is necessary that the majority of the population be convinced that integration and equal opportunities for Roma is in the interest of the entire society and that social cohesion benefits everybody. It is equally important that such campaigns do not ‘talk down’ to ordinary people from the majority, that the messages are aimed at both Roma and non-Roma to promote a positive notion of diversity together with a sense of common belonging as fellow Hungarian citizens. At the Open Society Foundations we have considerable experience of such campaigns and would be more than happy to share our experiences and ideas and provide support to work with the government to challenge negative attitudes and promote positive perceptions of Roma integration.

- **To what extent do the national goals represent an integrated approach on a 2020 timeline?**

See comments above.

- 3) **Action plan:** This section should include a clear action plan identifying concrete measures in at least the areas of education, employment, healthcare and housing, aiming to improve Roma integration, accompanied by a corresponding time schedule

and adequate funding. The action plan should be directly related to the aim of achieving the national goals. Each measure/action should be accompanied by an indication of the funding and of the sources (national funds, EU funds). The references to EU funds (measures and amounts) should be compatible with the content of the national operational programmes for the structural funds. In addition, other aspects to be taken into consideration when reference is made to the EU funds are: the use of housing interventions under the amended ERDF Regulation; the use of technical assistance to improve the management, monitoring and evaluation capacities of Roma-targeted projects; how and to what extent are global grants used; how the European Progress Microfinance Facility is used.

- **How 'clear' is the Action Plan in identifying concrete measures in the 4 priority areas? Is there a time schedule? How coherently does the Action Plan directly relate to the aim of achieving the national goals?**

Concrete measures are described only in the 3 years action plan (2012-14).

This action plan is mainly a list of measures that were already planned before the drafting of the strategy, rather than the practical steps of the strategy itself.

While the strategy has the ambition to close the gap between marginalized Roma communities and the majority population (even if no clear targets are defined), the action plan does not include measures that are strong enough to counterbalance the massive negative trends of exclusion, especially during the financial and economic crisis.

- **Which measures are accompanied by an indication of specific levels of funding and identified sources (national/EU funds)? Are these funding levels adequate?**

The majority of the planned measures are based on EU funds: out of 61 measures, 31 will be solely financed by EU funds, and another 5 will be partly financed by EU funds.

In most cases EU funds mean ESF (Social renewal operational programme).

Two planned measures contain larger amounts of funds, both in the field of employment: one for finishing primary school and vocational training (20 billion HUF, 65 million EUR), another for wage subsidy, etc. (60 billion HUF, 195 million EUR), both financed by EU funds.

The contribution of the national budget is minimal.

The use of legislative tools is also minor.

- **To what extent are the references to EU funds compatible with the considerations mentioned above?**

The strategy calls for a more effective use of EU funds. However, it fails to make suggestions to use existing options, e.g. implementation of longer term projects, use of simplified cost options, global grants, technical assistance, ERDF for housing, etc.

4) **Horizontal aspects:** The sections addressing the goals and the action plan should indicate how the goals, the actions, the funding and the outcomes fit into the wider context of the EU 2020 Strategy, national reform programmes, but also in the context of their own inclusion policies. The compliance with the **10 Common Basic Principles for Roma Inclusion** (e.g. attention to the gender dimension, promotion of intercultural aspects, involvement of Roma, etc.) should also be explained. In those Member States where promoting Roma inclusion is integrated in the general inclusion policies, the document should indicate how specifically the integrated sets of policy measures has impact on the Roma community.

- **What indications are there that the goals and action plan fit into the wider policy context outlined above?**

The clear intent running through the strategy, with its anti-poverty provisions and the pursuit of equity in access to services, opportunities and outcomes to close the gap between Roma and non-Roma is to be commended as far-sighted and forward-looking within the wider European context of EU 2020.

However, within the wider Hungarian policy context, there is a glaring omission throughout the text: this government launched an ambitious, and by their own definition, 'unorthodox' strategy of economic policies, aiming at growth, strengthening the middle class and including, inter alia, a tax cut for the rich, radical reduction of unemployment benefits and criminalizing homelessness. There is a tension between this raft of measures, likely to exacerbate inequality, at the very least in the short run, and the anti-poverty agenda contained in the strategy. While economic growth and social equity are not intrinsically irreconcilable goals, in this particular national policy context some trade-off between social goals is unavoidable. This would need to be acknowledged and a clear set of priorities identified, accompanied by, as the Commission suggests, a corresponding time schedule and adequate funding with a clear indication of the sources for such funding.

Some recent important Government policies and decisions that do not reflect the equality agenda of the strategy: The new law on education does not guarantee that disadvantaged children receive knowledge and skills needed for long term employment (see e.g. compulsory schooling only until the age of 16, etc.). Changes in the taxation system do not increase the motivation of employers to employ low educated people. Plans for public work programs as the main source of employment raise further worries.

- **To what extent does the NRIS comply with the 10 Common Basic Principles (annexed)?**

In general the strategy respects the 10 common basic principles.

However, some of the above issues raise questions about compatibility with these principles.

- The strategy is not clear about de-segregation, integration. In education the strategy avoids promoting integration or de-segregation. In housing the document is not clear

about de-segregation: programs will be limited to the improvement of the situation in segregated areas or will contain also assistance to move from these areas. These are in conflict with the principle of aiming for the mainstream (No 4).

- The strategy itself states that previous public works programs proved to be ineffective; still, increasing employment is foreseen mainly by public works. No explanation is given if and how deficiencies of previous programs can be corrected in foreseen programs. This is in conflict with the requirement of evidence-based policies (principle No. 6).

- 5) **Governance mechanisms:** This section should explain how the regional and local authorities were consulted and what role they will play in implementing the strategies/policies. It should also indicate how the civil society (including Roma NGOs), social partners and other stakeholders (e.g. educational bodies, associations etc.) have been involved in the design and will be involved in the implementation and monitoring of national strategies or sets of policy measures.

Most important players in foreseen governance mechanisms, besides the state secretariat for social inclusion, are the Roma self-government (ORÖ) and the Türrlistván training and research institute (TKKI). Most observers agree that these bodies have not displayed the required capacities to date and are unlikely to acquire them in the short-to-medium term. Cooperation with ORÖ and TKKI should be based on services, mutual trust and benefit, rather than administrative requirements.

- **With reference to Principle No. 8: What degree of consultation took place with regional and local authorities? What roles does the NRIS indicate for these authorities in implementing the strategies?**

The strategy does not give a clear definition on the role of regional and local authorities, which can be explained by the fact that the role of territorial levels is under serious changes currently in Hungary (e.g. schools and hospitals will be operated by the state).

- **With reference to Principles Nos. 9 and 10: Describe the process of consultation and engagement with civil society and Roma stakeholders and experts. Assess the quality of Roma participation and civil society consultation in the drafting, dissemination and discussion of the NRIS.**

The government had close cooperation with the Roma self-government (ORÖ). As the leader of ORÖ is a politician of the government party, this cooperation is important but not covering the diversity of the civil society and Roma stakeholders.

There were several consultations on the strategy with representatives of the civil society and Roma stakeholders, and it was also possible to channel in inputs from a broader consultation organised by Partners Hungary, financed by OSI.

It was possible to send comments to the draft strategy with adequate deadline. A weakness is that neither the comments nor the responses were made public.

The action plan we prepared parallel to the consultations on the strategy, so it was not possible to comment the action plan.

6) Monitoring the implementation of the strategies/policy measures and adjusting them in time: This section should describe the domestic monitoring methods and mechanisms to self-evaluate the impact of national strategies or sets of policy measures. It should also describe the review mechanisms to ensure that the strategy remains flexible and adapted to the changing circumstances.

- **Assess the adequacy of monitoring methods and mechanisms outlined above.**

Institutions and mechanisms described in the strategy - e.g. Inter-Ministerial Committee for Social Inclusion and Roma Affairs, Roma Coordination Council, annual reports to the government - are important and useful.

More details are needed on reporting, e.g. its ways to channel in civil society and expert views, publicity, etc. in order to create mechanisms that work.

- **Does the government collect and disseminate adequate disaggregated data to measure progress on integration? If not, what indication does the NRIS contain concerning plans to do so between now and 2020?**

The chapter on the current situation uses available data. The strategy has a separate chapter on the collection of data in the future, including ethnically disaggregated data.

7) Details of the National Contact Point: The document should indicate the contact point (including contact details) and its mandate to coordinate the development and implementation of the strategy/policies.

- **What is the structure and mandate of the National Contact Point? Is the resource allocation to the NCP proportionate to the task of coordinating the development and implementation of the NRIS?**

The contact point is the State Secretariat for Social Inclusion within the Ministry for Public Administration and Justice.

The government decision on the approval of the strategy and the action plan designates the Ministry for the coordination of reporting on the implementation of the action plan annually, and the revision of the action plan every second year. Internal rules of the Ministry may designate the State Secretariat for these tasks.

The significant list of recent important Government policies and decisions that do not reflect the equality agenda of the strategy leaves doubts about the ability to coordinate the implementation of the strategy.

INDICATIVE LISTING: Below is an 'indicative listing' of the potential measures which can be considered in the four priority areas of education, employment, health, and housing.

Key:

✓ = included in NRIS, ½ = included in NRIS but not clear enough, ✗ = not included in NRIS

EDUCATION measures directed at:

- ½ Preventing discrimination or segregation of Roma children at school (*the strategy tend to avoid promoting integration or de-segregation*);
- ✓ Providing Roma children with sustainable access to quality education;
- ✓ Widening the access to quality early childhood education and care;
- ✓ Completion of primary education by all Roma children;
- ✓ Reducing the number of early school leavers from primary and secondary education;
- ✓ Increasing Roma youngsters' participation in tertiary education;
- ✗ Increasing the use of innovative educational approaches such as ICT-based access to learning and skills.

In principle, education experts from the Roma Education Fund strongly endorsed the integrative approach central to the strategy. The promotion of the inclusive school environment is a key value which contributes both to social integration and improved educational outcomes to decrease the educational gap between Roma and non-Roma. The strategy contains many elements which can prove effective for Roma, for example, the establishment of external evaluation system of the schools; the employment of Roma mediators; the creation of kindergarten places in all municipalities; the reform of teacher training and the revision of the institutions of the children with special needs. Further, extending support for after-school activities and second chance type programs is a valuable goal. The priorities as set out are relevant regarding the current situation of Roma education: that quality ECED services should be available for all children, early-school leaving should be decreased, while increasing access for Roma to vocational and grammar schools.

Suggestions regarding the strategy:

- Set quality standards for all affirmative action programs, such as the proposed 'school turning support program' (*aziskolaifordulópontokatsegítő, könnyítőprogramok*) to ensure that students are in fact reintegrated into mainstream classes after the program concludes. Inclusive education support programs should be integrated into mainstream provision as it is more cost effective than maintaining extra programs.
- Instead of the option of boarding schools, it is better to promote early intervention, scholarship and after school programs which target drop-out and early school leaving.
- There is a need for concrete measures to be adopted to desegregate schooling once and for all in Hungary.
- Anti-discrimination legislation should contain more legal measures to address segregation effectively.
- In promoting the goal of equal access to quality education it is important to ensure the sustainability of non-formal educational programs supporting Roma.

Education experts agreed that the planned social and geographical targeting is a good concept for addressing the problems of Roma people in general. As stated some two-thirds of Roma people fell into the category of multiply-disadvantaged and live in economically depressed regions, therefore this combined targeting would be effective for outreach. Nevertheless, ethnic targeting should not be only limited to cultural preservation and anti-discrimination programs. There were considerable concerns raised regarding the abuse of social transfers available for disadvantaged groups not reaching the original target group. Overly wide targeting and decentralization may not be the best means to address the plight of those people most in the need of intervention. In addition, there are fields in the education system, which are better addressed by using ethnic targeting. Talent-care, after-school activities and scholarships are examples where explicit targeting may be more effective for the interventions to reach Roma.

The category of multiply-disadvantaged needs to be more explicitly defined: international experience shows that if it is too vague, national governments cannot sustain financial resources. Roma education experts suggest considering the PISA index⁹ combining socio-economic (ISEI) and cultural status of family.

In terms of early childhood we would recommend looking at the Roma Education Fund 4-country project which has the same main objective as articulated in the strategy: to ensure access to quality early childhood services for Roma and deprived families combining alternative means and concrete measures. The pilot project named 'A Good Start' is supported by European Union Fund and targets to reach out 850 Roma children in Hungary.

The importance of making available kindergarten places for all children and culturally sensitizing teaching curricula cannot be overstated. Roma mediators can contribute to establishing better relationships between marginalized families and educational institutions. According to international experience, well-trained community mediators can improve inter-ethnic relations by bridging the two groups. Experience shows also that there are alternative practices for parental involvement, which can have a positive effect in boosting school attendance rates.

Concerning the paragraph on p. 70-71 (see below):

Az általános iskolafelsőtagozatán más megoldások is alkalmazhatók, így pl. kollégiumi, illetve externátusi ellátás. Nemcsak azoknak, akiknek a lakóhelyen az iskolával azonos településen van, hanem azoknak is, akik családi körülményeik miatt otthon nem tudnak tanulni, ezért felzárkózásuk, személyiségfejlődésük szempontjából jobb, ha hétköznap nem laknak otthon, ugyanakkor nem kell kiemelni őket a családból, és nevelőszülőnél vagy gyermekotthonban elhelyezni, ami sokkal kevésbé humánus, sokkal drágább, és összességében szükségtelen megoldás lenne.

⁹ <http://stats.oecd.org/glossary/detail.asp?ID=5401>

The reviewer found this section unclear in terms of who precisely is the target group for this 'solution'. There are no legal grounds to remove a child from its family simply because the child is experiencing educational difficulties. Neither is such reasoning an adequate justification for setting up such institutions. *Tanodas* and other quality after-school activity programs would serve better the purpose.

Reviewers suggest that community building and awareness raising events targeting youth for disseminating the importance of health, education, social values are important and their success can be enhanced by partnering with civil sector organizations in the implementation stage.

While the goal of supporting Roma children to avail of vocational education is worthy in itself, various studies have underlined that the quality of education in these institutions is generally weak, the failure rates are high (almost 30%), and some 50% of children fail to complete vocational education. In addition, it is very often the case that the skills acquired with such qualifications are simply not marketable.

As discussed above in governance and participation issues, the question was raised concretely in the field of education: how does the government intend to involve the civic sector and social partners in consultation decision-making and implementation? Cooperation with ORÖ is important, but civil organizations with more expertise and experience in education need to be involved throughout the entire process, and the strategy should be explicit about how such participation is envisaged.

EMPLOYMENT measures directed at:

- ½ Providing non-discriminatory access for Roma to vocational training, to the job market and to self-employment tools and initiatives (*the Strategy emphasizes that employment should be increased first on the job market, second in social economy, and just third with public works, but government decisions favor the latter*)
- ½ Providing access to micro-credit (*no details included*)
- ½ Employing Roma civil servants in the public sector (*there are concrete plans to employ Roma women in social services, but there is no plan to employ Roma in the public administration*)
- ✓ Employment Services to reach out to Roma by providing personalized services and mediation
- ½ Attracting more Roma on the labour market (involvement of the social partners/business associations etc.?) (*The Strategy emphasizes that employment should be increased first on the job market, second in social economy, and just third with public works, but government decisions favor the latter*)

The goals, targets etc. are devoid of hard numbers and verifiable targets. Some discussion points raised were as follows:

The proposed incentives to "whitening" black employment could be counterproductive as it is likely to reduce employment opportunities (unless it is coupled with large cuts in wage costs or well-targeted and long-term wage subsidies), although it may improve the wages (and future pensions) of those who keep their jobs. Reviewers questioned the rationale: the

single most important cause of poverty in Hungary is the lack of employment, not low wages. Also, if low wages were the problem, that could be more efficiently remedied by offering in-work benefits than by administrative / regulative efforts to increase wages (and in the longer run, by raising levels of education).

More emphasis is needed concerning the role of wage costs and travel costs. Key recommendations include: reduce wage costs for the low educated; improve the targeting of wage subsidies; replace the third year of the maternity benefit with a voucher that can be used to cover travel costs, child care or to supplement part-time earnings; improve public transport access from villages to the first and second local centres.

Lifelong learning and second chance type opportunities for integration into the labour market is of crucial importance. The idea that poorly-educated and unqualified youth should be offered suitable jobs, rather than education is described as 'incredibly short sighted': all labour market analyses confirm that the long term prospects of uneducated people are very poor and basic skills are a precondition to adaptation to changing labour market needs. No youth should be allowed to enter the labour market without these skills.

Old public works schemes are rightly described in the strategy as inefficient. But no explanation is given if and how their deficiencies can be corrected. Thus Government plans for massive public works programs are questionable.

The hope that becoming an entrepreneur could be an important way out of poverty for a significant swathe of the population seems at this point and very unfortunately a pipe dream, unless a lot is done concerning red tape and bureaucratic regulation, if the little that is known about such efforts (<http://www.kiutprogram.hu>) is any indication.

ACCESS TO HEALTHCARE measures directed at:

- ✓ Providing access to quality healthcare, with particular attention to women and children
- ✓ Providing access to Roma to preventive care and social services
- ✓ Involving qualified Roma in healthcare programs (role of mediators) (*there are concrete plans to employ Roma women in social services*)

The strategy emphasizes that prevention and targeted information campaigns are essential when it comes to employment and the performance of children at school. Aside from the economic rationale, the quality of life of citizens is of fundamental importance to integration, as it has a direct bearing on how many years a person spends in good health and what life expectancy one can hope for.

We welcome that the strategy gives a clear picture on the poor access to basic health services (general practitioners, health nurses) in disadvantaged areas where also the Roma population concentrates, and commits itself to change this situation.

The strategy highlights very correctly that there is a need for programs to encourage participation at screenings and use of mobile screening units. Note: mobile mammography screening units are not available in all the regions of Hungary, therefore in these regions the

facilitation of the travel to the nearest screening center is the solution. The Equal Chance against Cancer program might serve as a good and cost-effective model for this objective. It facilitates the access of Romani and also non-Romani women to mammography screening while - in the framework of a health day - the local population has access to several health checks and information about healthy life-style.

Romani women are considered as a priority target group in relation to the issues of family planning and pregnancy. However, the role of Romani women cannot be overestimated when it comes to the health of the entire family as they are the ones in charge of the alimentation of the family, vaccination of the children, contacts with health institutions, etc.

The strategy confirms that based on the framework agreement of the government with the Hungarian Roma Self-Government (ORÖ), the government will provide support for the training and gaining practice of health mediators selected by ORÖ. The introduction of a health mediators' network is most welcome. The model has proven successful in different countries. But the fact that the government does not take the responsibility to employ the health mediators will render the exercise unsustainable and critically diminish its impact.

The document mentions the importance of the employment of Roma health professionals in the health care system. However, the document does not mention here the importance of increasing the number of medical students of Roma origin in universities. (The Decade Action Plan of Hungary mentioned this objective.)

The document states that the specific health features of the Roma population make it necessary to develop a Roma health policy. It is important to note here that there are no Roma-specific illnesses. What is indeed specific to the situation of Roma in the health care system is discrimination - as a recent study released by FRA notes, in the previous year 18% of the Roma population felt discriminated in the health care system. It clearly shows that there is a strong need to set up a health mediator system, as well as to introduce anti-discrimination elements in the education of health professionals, as suggested by the document. However, a health strategy targeting people living in deep poverty should be based on the principle of "explicit but not exclusive" targeting of the Roma population.

ACCESS TO HOUSING AND ESSENTIAL SERVICES via measures directed at:

- ½ Providing non-discriminatory access to housing, including social housing (*no details included; the document is not clear about de-segregation: programs will be limited to the improvement of the situation in segregated areas or will contain also assistance to move from these areas*)
- ✓ Implementing an integrated approach, of which housing intervention is part
- ✗ (*not applicable in the Hungarian context*) Addressing the special needs of non-sedentary Roma population, where applicable
- ✗ Providing details of the means of involvement of regional and/or local authorities as well as local Roma and non-Roma communities

The strategy gives a sound base for actions as it identifies the main tasks: strengthening housing security, decreasing the costs of housing, increasing the supply of social housing, assisting mobility, supporting the social integration of people living in segregated areas.

It is not clear about social integration: is it just the improvement of the access to public services or also the decrease of the territorial concentration of disadvantaged – low skilled, unemployed – people.

Another weakness is – as in other parts – the lack of measurable targets and legislative or budgetary measures.

The action plan contains only 1 concrete action, the complex program of segregated areas. Concerning this action: Its budget is around 5 times more than the annual budget of similar programs in the past. But its planned content (whether it will decrease the territorial concentration of disadvantaged people, whether – in line with the 10 common basic principles – it will involve the Roma community and NGOs in the planning and implementation of the projects) is questionable.

ROMANIA

1) Description of the current situation: The description of the current situation of Roma in the given Member State should include the geographical distribution (mentioning regions, cities, localities); estimates of the Roma population on their territory; description of the socio-economic challenges of Roma with particular attention to the four key areas: education, employment, housing, healthcare, and any other specific issues deemed important within the given national context.

- **To what extent does the NRIS meet this criterion?**

The document does not mention any geographical distribution. The data used are from 2002 census, 2005 World Bank research, and EC estimations.

The description of the socio-economic challenges of Roma is very short. Little and old data (2002, 2005, 2006, 2008) are used, even though more recent research is available from 2009 and 2010.

- **Does this description include relevant concrete indicators (i.e., for education, number of school age Romani children, number and percentage enrolled, number and percentage in special education)?**

The indicators used are old: for education the indicators (%) are from 2002; employment (%) – 2008; housing (%) – 2006; health (%) – 2009 (but the source of data is not accurate because the presidential report they are referring to is based on secondary analysis of documents, so data are from other researches).

- **Identify where information is wrong or incomplete**

A better presentation of Roma situation in Romania was put together by my colleague OvidiuVoicu for the European Parliament report "Measures to promote the situation of Roma EU citizens in the European Union" (2011) (Dr. William Bartlett, Roberta Benini, Claire Gordon). The same data was also sent to the Romanian Government during the process of consultation organized by General Secretariat of the Government and National Agency for Roma. Our contribution was totally disregarded (see at the end of this document).

- **Identify any contentious issues in the analysis or interpretation of the current situation**

The current strategy has no baseline study (even though it was proposed by the Coalition for National Strategy for Roma Inclusion¹⁰). The strategy has no progress indicators and the budgetary indications are very general (ex.: structural funds, local budget, other sources).

¹⁰An informal group created at the initiative of several nongovernmental organizations in order to create a joint platform for debates in the context of the elaboration by the Romanian Government, of fundamental strategic documents for the future of Roma communities.

2) **National goals:** The section should define the national goals and of how they fit into the Roma integration goals defined by the EU Framework. These goals are expected to cover at least the four crucial areas of education, employment, healthcare and housing in order to close the gap between marginalised Roma communities and the majority population, but Member States can add other goals relevant to their specific national context, and to define also intermediate steps. An integrated approach combining actions in a variety of policy areas is strongly recommended. The timeline is 2020.

- **To what extent does the set of national goals in the NRIS match those defined by the EU Framework?**

“The scope of the Government Strategy for the inclusion of Romanian citizens belonging to Roma minority for the period 2012 – 2020 is to ensure the social and economic inclusion of Romanian citizens belonging to Roma minority, by implementing integrated policies in the fields of education, employment, health, housing, culture and social infrastructure.

Moreover, the Government Strategy aims at making the local and central public authorities, the Roma minority and the civil society responsible for the increase of the level of social and economic inclusion of the Romanian citizens belonging to Roma minority.”

- **To what extent are the goals articulated in terms of concrete indicators (e.g., for education, a specific targeted annual increase in the number and percentage of Romani children completing secondary school)**

The goals are so general and they did not operationalize them into concrete indicators. If there is no baseline study, it is impossible to measure the progress. There are some indicators of the proposed actions, but they are not correlated with the measures of the sectorial action plans of measures.

- **Has the government added other goals relevant to the specific national context? If so, how relevant are these goals? Are there any other goals that should be added?**

They added another goal: culture and social infrastructure. These two goals are relevant.

- **To what extent do the national goals represent an integrated approach on a 2020 timeline?**

First of all it is worth mentioning that the actual document is a compilation of sectorial action plans of each of the ministries involved. Even though at the level of declarations they were all interested in adopting an integrated approach, the result is something very different. Each ministry proposed the goals and measured that they were sure they can deal with (the minimum agenda), which is explainable because we do not have a baseline study to measure achievements.

3) Action plan: This section should include a clear action plan identifying concrete measures in at least the areas of education, employment, healthcare and housing, aiming to improve Roma integration, accompanied by a corresponding time schedule and adequate funding. The action plan should be directly related to the aim of achieving the national goals. Each measure/action should be accompanied by an indication of the funding and of the sources (national funds, EU funds). The references to EU funds (measures and amounts) should be compatible with the content of the national operational programmes for the structural funds. In addition, other aspects to be taken into consideration when reference is made to the EU funds are: the use of housing interventions under the amended ERDF Regulation; the use of technical assistance to improve the management, monitoring and evaluation capacities of Roma-targeted projects; how and to what extent are global grants used; how the European Progress Microfinance Facility is used.

- **How 'clear' is the Action Plan in identifying concrete measures in the 4 priority areas? Is there a time schedule? How coherently does the Action Plan directly relate to the aim of achieving the national goals?**

The description of each measure, the responsible institutions as well as the deadlines are clear. The indication of the cost/budget/indicators is missing.

- **Which measures are accompanied by an indication of specific levels of funding and identified sources (national/EU funds)? Are these funding levels adequate?**

Housing (incomplete), culture, social infrastructure. For the rest (education, health and employment) the budgets are incomplete. For some measures there are some specific budgets, but for others are indicated in general manners without any figures: the state budget, structural funds, etc.

- **To what extent are the references to EU funds compatible with the considerations mentioned above?**

It is premature to give you an answer now. We are for most OPs at the end of programming period and most funds are already contracted, so it is difficult to assess to what extent the proposed measures are likely to be financed by the OPs. More, since the negotiation for the next programming period (2014-2020) is only at the very beginning it is too soon to have any estimation.

4) Horizontal aspects: The sections addressing the goals and the action plan should indicate how the goals, the actions, the funding and the outcomes fit into the wider context of the EU 2020 Strategy, national reform programmes, but also in the context of their own inclusion policies. The compliance with the **10 Common Basic Principles for Roma Inclusion** (e.g. attention to the gender dimension, promotion of intercultural aspects, involvement of Roma, etc.) should also be explained. In those Member States where promoting Roma inclusion is integrated in the general inclusion policies, the document should indicate how specifically the integrated sets of policy measures has impact on the Roma community.

Because the Romanian NRIS was only recently made available the answers to this section require more time for analysis and documentation.

- **To what extent does the NRIS comply with the 10 Common Basic Principles (annexed)?**

There is no sensitivity of the gender dimension in the policy measures adopted, except some specific national programmes in the field of public health;

The civil society was not involved in a real consultation process; none of the NGO's contributions were not taken into consideration;

The active participation of the Roma is almost absent in the policy measures designed for their inclusion.

The use of community financial instruments in the implementation of the policy measures of the Strategy is only a 'wishful thinking', as in the current financial exercise there are no funds available for the Major Fields of Interventions under the Axe 6 of the ESF, the only place where the Roma are explicitly enumerated as target group and counted as indicators. Up to now, the negotiations for the next programmatic period 2013-2020 didn't start.

The local authorities were not involved in drafting the policies.

5) Governance mechanisms: This section should explain how the regional and local authorities were consulted and what role they will play in implementing the strategies/policies. It should also indicate how the civil society (including Roma NGOs), social partners and other stakeholders (e.g. educational bodies, associations etc.) have been involved in the design and will be involved in the implementation and monitoring of national strategies or sets of policy measures.

- **With reference to Principle No. 8: What degree of consultation took place with regional and local authorities? What roles does the NRIS indicate for these authorities in implementing the strategies?**

According to the explanatory memorandum of the Governmental Decision 1221 from December 14, 2011 (which approved the Strategy of the Government of Romania for the Inclusion of Romanian Citizens belonging to Roma Minority (2012-2020)) the consultations with the regional and local authorities were organized by the National Agency for Roma with the support of the Ministry of Administration and Interior (county Roma experts – BJRs are employed by the Prefecture Office).

- **With reference to Principles Nos. 9 and 10: Describe the process of consultation and engagement with civil society and Roma stakeholders and experts. Assess the quality of Roma participation and civil society consultation in the drafting, dissemination and discussion of the NRIS.**

According to the explanatory memorandum of the Governmental Decision 1221 from December 14, 2011 (which approved the Strategy of the Government of Romania for the

Inclusion of Romanian Citizens belonging to Roma Minority, 2012-2020) the consultations with the civil society and Roma stakeholders was organized by National Agency for Roma starting with November 2010 with the following NGOs considered to be involved in Roma issue: Roma Civic Alliance, Resource Centre for Roma Communities, Soros Foundation Romania, Roma Education Fund Romania, Civil Society Development Foundation, Public Policies Institute, UNDP Romania, UNICEF Romania.

According to the same document the draft strategy was up for consultation from August 1st for 31. The document was displayed without actions plans that were posted two weeks later as a result of different pressures from NGOs and academics.

The consultation was formal even though we were encouraged to give them feedback. During the two meetings Coalition for National Strategy for Roma Inclusion had with General Secretariat of the Government and National Agency for Roma they have promised to organize another meeting with us during which we were supposed to discuss our feedback (what will be taken into consideration and what will not be). This meeting never took place. The Coalition for National Strategy for Roma Inclusion (the above NGOs mentioned were part of the coalition) provided at the end of August its consistent feedback based on few meetings organized with other local NGOs.

6) Monitoring the implementation of the strategies/policy measures and adjusting them in time: This section should describe the domestic monitoring methods and mechanisms to self-evaluate the impact of national strategies or sets of policy measures. It should also describe the review mechanisms to ensure that the strategy remains flexible and adapted to the changing circumstances.

- **Assess the adequacy of monitoring methods and mechanisms outlined above.**

“One important component of the monitoring mechanism is measuring the degree of the Roma minority’s social inclusion and the degree of structural funds absorption.”

Even though it is stated as being an important component of monitoring mechanism “to measure the degree of the Roma minority’s social inclusion” it is not clear how this will be put into practice. The support and real involvement of civil society is at the core of the monitoring mechanism of the strategy there is no clear reference of how this should work. The monitoring mechanism is only presented as a general guideline for what is supposed to happen at the central and county level, without any specific indication. There is not yet established the inter-institutional system for communication and monitoring, nor any reference of how the NGOs will be involved in this system. There is also not clear who will be responsible to carry out the impact study of the Strategy following each period of implementation of the measures.

- **Does the government collect and disseminate adequate disaggregated data to measure progress on integration? If not, what indication does the NRIS contain concerning plans to do so between now and 2020?**

No, the Romanian government does not collect disaggregated data to measure progress on integration. In our feedback to the Romanian Roma Strategy it was mentioned the need to collect disaggregated data on ethnicity.

- 7) Details of the National Contact Point:** The document should indicate the contact point (including contact details) and its mandate to coordinate the development and implementation of the strategy/policies.

- **What is the structure and mandate of the National Contact Point? Is the resource allocation to the NCP proportionate to the task of coordinating the development and implementation of the NRIS?**

The National Contact Point would be the same with the Central Department for Monitoring and Assessment with the role of coordinating the implementation of monitoring and evaluating activities of the strategy. The Central Department for Monitoring and Assessment will be lead by a state councillor with the following membership: the president of NAR, a representative of the monitoring and assessment offices from the Ministry of Administration and Interior, the Ministry of Regional Development and Tourism, the Ministry of Education, Research, Youth and Sport, the Ministry of Labour, Family and Social Protection and the Ministry of Health, as well as two representatives from the General Secretariat of the Government. There is no resource allocation for the NCP (or at least not in this document).

INDICATIVE LISTING: Below is an ‘indicative listing’ of the potential measures which can be considered in the four priority areas of education, employment, health, and housing.

Key:

✓ = included in NRIS, ½ = included in NRIS but not clear enough, ✗ = not included in NRIS

EDUCATION measures directed at:

- ✓ Preventing discrimination or segregation of Roma children at school
- ✓ Providing Roma children with sustainable access to quality education
- ✓ Widening the access to quality early childhood education and care
- ½ Completion of primary education by all Roma children
- ✓ Reducing the number of early school leavers from primary and secondary education
- ✗ Increasing Roma youngsters' participation in tertiary education
- ✗ Increasing the use of innovative educational approaches such as ICT-based access to learning and skills

EMPLOYMENT measures directed at:

- ✓ Providing non-discriminatory access for Roma to vocational training, to the job market and to self-employment tools and initiatives
- ✗ Providing access to micro-credit

- ✘ Employing Roma civil servants in the public sector
- ½ Employment Services to reach out to Roma by providing personalised services and mediation
- ✓ Attracting more Roma on the labour market (involvement of the social partners/business associations etc.?)

ACCESS TO HEALTHCARE measures directed at:

- ✘ Providing access to quality healthcare, with particular attention to women and children
- ✘ Providing access to Roma to preventive care and social services
- ✘ Involving qualified Roma in healthcare programs (role of mediators).

ACCESS TO HOUSING AND ESSENTIAL SERVICES via measures directed at:

- ✘ Providing non-discriminatory access to housing, including social housing; no
- ✓ Implementing an integrated approach, of which housing intervention is part of; yes
Addressing the special needs of non-sedentary Roma population, where applicable;
(not applicable)
- ✘ Providing details of the means of involvement of regional and/or local authorities as well as local Roma and non-Roma communities. no

SLOVAKIA

- 1) Description of the current situation:** The description of the current situation of Roma in the given Member State should include the geographical distribution (mentioning regions, cities, localities); estimates of the Roma population on their territory; description of the socio-economic challenges of Roma with particular attention to the four key areas: education, employment, housing, healthcare, and any other specific issues deemed important within the given national context.

- **To what extent does the NRIS meet this criterion?**

The description of the current situation is found in two parts – general description in the part called Context of the strategy and particular description concerning the four key areas in the part called Priority politics of the Strategy. At the beginning of the general description the text of the Strategy acknowledges that the Roma are one of the groups most menaced by poverty, social exclusion and discrimination. Then it develops on the topic of missing ethnic data and afterwards lists some socio-economic data on the basis of a 2004 sociographic territorial mapping of Roma communities and a 2010 UNDP selective survey. The text includes estimates of the Roma population in Slovakia. It does not explicitly mention concrete geographical distribution of Roma in Slovakia but it is citing the 2004 survey whose outputs are accessible online. Besides the mentioned socio-economic data about the living conditions of the Roma in Slovakia expressed in percentages, the chapter Context of the strategy mentions also findings concerning the views of Roma by the majority population and vice versa.

The description parts concerning the four key areas are much weaker than the general description part. They are naming general characteristics of specificities of the living conditions of the Roma and obstacles they face. The descriptions vary in generality of content from one area to another (the most information providing in the part concerning education, then health, employment and the least information is provided about housing).

- **Does this description include relevant concrete indicators (i.e., for education, number of school age Romani children, number and percentage enrolled, number and percentage in special education)?**

Ethnic data are not officially collected in Slovakia. Descriptions of the current situation of Roma can be therefore built on partial surveys and on estimations on the basis of different indicators (e.g. there exists in the education field a “children from socially disadvantaged background” category which can be used for estimations on numbers of Roma children from the so-called marginalized communities in the educational system; or the data from the mentioned 2004 survey can be used as a basis for knowledge of geographical distribution of Roma communities which can then be compared with data relevant to certain regions concerning e.g. unemployment rates etc.). The descriptions of the four key areas generally lack relevant concrete indicators and limit themselves to general statements. Concerning education the text cites two numbers from the 2009 Roma Education Fund analyses – the percentage of Roma pupils in special education and special classes. It also cites the 2010 UNDP survey data about percentage of completion of primary school curriculum in the

marginalized Roma communities' environment. Two graphs were added from a 2011 UNDP and World Bank survey about marginalized Roma – number of years spent in the educational system, proportion of individuals who never attended pre-school educational facilities and proportion of individuals who did not finish secondary education. These graphs show the difference between the majority and Roma population. The employment part cites data about long term unemployment and says that “on the basis of unofficial data about unemployment in the Roma population” most of the long term unemployed in Slovakia are Roma. Concrete data concerning health are cited about child mortality amongst Roma. No relevant concrete indicators are cited in the housing chapter.

- **Identify where information is wrong or incomplete**

Information about the current situation are not wrong, they are only very general which would not be a problem concerning the general description part. It is nevertheless problematic in the four-key areas chapters as the global goals are set in the form of diminishing the gaps between the Roma and the majority population and for this purpose it would be helpful to indicate more precisely what the gaps are. This is in some cases done in the formulation of goals but not systematically.

- **Identify any contentious issues in the analysis or interpretation of the current situation**

The description part is one of the least contentious parts of the Strategy. It acknowledges the need of an ethnic data gathering system, builds on existing data sources and describes obstacles the Roma population faces in Slovakia.

2) National goals: The section should define the national goals and of how they fit into the Roma integration goals defined by the EU Framework. These goals are expected to cover at least the four crucial areas of education, employment, healthcare and housing in order to close the gap between marginalized Roma communities and the majority population, but Member States can add other goals relevant to their specific national context, and to define also intermediate steps. An integrated approach combining actions in a variety of policy areas is strongly recommended. The timeline is 2020.

- **To what extent does the set of national goals in the NRIS match those defined by the EU Framework?**

The National Roma Integration Strategy elaborates on the four key areas determined by the EU Framework in part D entitled Policies of the Strategy. Each chapter dealing with one of the four key areas starts with a so-called global goal which builds on the EU Framework recommendations. The global goal is followed by several specific goals which are more detailed and in their majority defined by indicators. The same structure is followed in all chapters covering the four key areas – education, employment, health and housing.

Concerning education, the global goal does not explicitly state “ensure that all Roma children complete at least primary school” but this is done in the second specific goal. In the other areas the global goals follow the language of the EU Framework.

However, the goals (mostly the specific ones) stipulated in the key areas in the Strategy are often written down in the form of more or less concrete measures which brings a lot of confusion to the coherency of the text. The difference between goals and measures has not been properly understood and thus it might cause a lot of problems in the process of implementation of these goals by the stakeholders. The goals and action plans are somehow mixed together.

There have been various proposals and comments from the side of NGOs towards this issue but not much has been accepted. So even though the key areas are elaborated quite extensively it is questionable how the goals are going to be performed when they are not written in the same form and thus implicate various interpretations. Also every chapter covering one of the four areas is written in different style, formulations of goals and indicators vary from one chapter to another.

- **To what extent are the goals articulated in terms of concrete indicators (e.g., for education, a specific targeted annual increase in the number and percentage of Romani children completing secondary school)**

The Strategy does not operate with year to year indicators. In general the indicators are very weak and will not enable to measure effectively all the presented goals.

- **To what extent do the goals cover the 4 priority areas with a view to ‘closing the gap between marginalized Roma communities and the majority population’?**

As mentioned above the “global” goals are formulated as “closing the gap”, the question is whether also the specific goals under each chapter could really contribute to these overall goals. Sometimes the content of the global goal is not reflected in the specific ones and it is not very clear how to interpret this situation.

- **Has the government added other goals relevant to the specific national context? If so, how relevant are these goals? Are there any other goals that should be added?**

Besides the four key areas the Slovak Government decided to add other areas: financial inclusion, non-discrimination and public opinion. These areas follow the four key areas and are considered to be cross-sectional. The other areas which have been added by the Slovak Government are less extensive and rather vague. The area of non-discrimination is a crucial part to each area and therefore this topic should be of a cross-sectional nature. However, the part devoted to this area in the Strategy provides very broad understanding of discrimination problems and focuses mostly on better implementation of the anti-discrimination act, legal services and other institutional issues. The non-discrimination aspect is omitted in each key area. So even though the non-discrimination area is absolutely relevant to the Strategy and its goals, the non-discrimination goals are not elaborated thoroughly.

Another area which has been added is dealing with the financial inclusion. This sub-chapter deals mostly with financial literacy, access to financial services, micro credits as well as

usury. The relevancy of this topic is undisputable and the goals set out in this part are of a crucial importance in solving the financial situation and problems of the Roma population.

Contrary to this well-elaborated subchapter is the following part on the public opinion which deals with the attitudes of the majority population towards Roma people. This part is probably the weakest one comparing to the other subchapters as it does not encompass a global goal, specific goals, indicators nor baseline. It only consists of concrete measures and it does not follow the general structure of other policy areas at all.

Even though the Strategy comprises non-discrimination goals, it lacks a similar chapter on gender equality. According to the Strategy's plan of activities, this should be done in the second quarter of 2012.

- **To what extent do the national goals represent an integrated approach on a 2020 timeline?**

The goals were more or less formulated in a way that the "global" goal copies the formulation of the EU Framework goal and the specific goals are mostly reformulated goals and measures from the 2011 Decade National Action Plan. Thus the goals represent past thinking of what could be achievable in 2015.

- 3) Action plan:** This section should include a clear action plan identifying concrete measures in at least the areas of education, employment, healthcare and housing, aiming to improve Roma integration, accompanied by a corresponding time schedule and adequate funding. The action plan should be directly related to the aim of achieving the national goals. Each measure/action should be accompanied by an indication of the funding and of the sources (national funds, EU funds). The references to EU funds (measures and amounts) should be compatible with the content of the national operational programmes for the structural funds. In addition, other aspects to be taken into consideration when reference is made to the EU funds are: the use of housing interventions under the amended ERDF Regulation; the use of technical assistance to improve the management, monitoring and evaluation capacities of Roma-targeted projects; how and to what extent are global grants used; how the European Progress Microfinance Facility is used.

- **How 'clear' is the Action Plan in identifying concrete measures in the 4 priority areas? Is there a time schedule? How coherently does the Action Plan directly relate to the aim of achieving the national goals?**

For the purpose of the National Roma Integration Strategy, the Slovak Government has not drafted new action plans for the key areas. This is due to the fact that in June 2011 there was finished and adopted the Revised National Action Plan of the Decade of Roma Inclusion for years 2005 – 2015. Thus the action plans on education, employment, housing and health had been prepared before the drafting of the Strategy started and they are going to be used as action plans for this Strategy. The Decade Action Plan comprises a time schedule with the most problematic being the area of education where all activities are due in 2015. These

action plans are going to be evaluated in 2015 and new action plans will be drafted and adopted for the period from 2016 to 2020.

The other policy areas that were added by the Government are going to have their separate actions plans prepared in the first quarter of year 2012. The same applies for other areas - gender equality and fight against crime and security which are mentioned in the timeline of the Strategy and are due to be prepared in the second quarter of year 2012.

Also, as mentioned above, some of the goals are actually formulated as measures and thus the chapter with goals resembles sometimes action plans.

- **Which measures are accompanied by an indication of specific levels of funding and identified sources (national/EU funds)? Are these funding levels adequate?**

The Revised National Action Plan of the Decade of Roma Inclusion for years 2005 – 2015 has partially defined financing (Annex 2 of the Strategy). The financial allocations are from the state budget as well as from the structural funds and the cohesion fund of the EU. The information provided about funding of activities comprised in the Action Plan is divided by relevant ministries not by particular activities. This information is in a three years horizon and is very general and incomplete. Also, doubts persist about completeness and factuality of financial data provided. It is therefore difficult to assess adequacy of the presented financial calculation.

Regarding the new policy areas the financial aspects will be elaborated once the action plans for each areas is created. The Strategy tries to portray the financial impacts of the Strategy in its subchapter E.3. However there are no concrete financial details and it rather describes the possibilities of EU funds which might be used in the future. There are no detailed plans how to and when to use these funds. Moreover the use of the state budget in financing of the integration policies is not indicated at all. There is a part which elaborates on the current program period from 2007 to 2013 but it describes the problems that were encountered in the financing of this period and does not state any concrete plans and financial allocations for the upcoming years.

Therefore the financial aspect of the Strategy is quite weak and does not provide any clear idea of financial impacts of the Strategy.

- **To what extent are the references to EU funds compatible with the considerations mentioned above?**

The financial calculations for the Decade Action Plan mention explicitly only the use of the European Social Fund from which national projects are planned to be funded. This reference to EU funds is compatible with the national operational programme. It also mentions generally the use of structural funds and the EU Cohesion Fund but without further details.

The part of the Strategy addressing its financing stresses the need to influence the 2014-2020 programming period with a mention of the ESF, ERDF and EAFRD. The Strategy states that the priority areas are financeable from the mentioned EU funds.

4) Horizontal aspects: The sections addressing the goals and the action plan should indicate how the goals, the actions, the funding and the outcomes fit into the wider context of the EU 2020 Strategy, national reform programmes, but also in the context of their own inclusion policies. The compliance with the 10 Common Basic Principles for Roma Inclusion (e.g. attention to the gender dimension, promotion of intercultural aspects, involvement of Roma, etc.) should also be explained. In those Member States where promoting Roma inclusion is integrated in the general inclusion policies, the document should indicate how specifically the integrated sets of policy measures has impact on the Roma community.

- **What indications are there that the goals and action plan fit into the wider policy context outlined above?**

The National Roma Integration Strategy mentions EU 2020 Strategy in a short and separate chapter in the beginning of the document and is followed by a short description of the EU Framework. Both sections are rather descriptive and do not present the perception of these documents by the Slovak Government. Further in the text of the Strategy these documents are not mentioned or elaborated more and the same applies for the 10 Common Basic Principles for Roma Inclusion. The introduction parts within each policy area do not explicitly deal with those principles but rather describe the current situation.

However, in the beginning of the Strategy there is a well elaborated separate section on principles which should govern all policy areas and be applicable throughout the whole Strategy. These principles include: destigmatization, desegregation and deghettoization. This part also includes principles of implementation of the Strategy which are: solidarity; legality; partnership; complexity; conceptuality, systemic approach and sustainability; respect of regional and sub-ethnic characteristics; gender equality; responsibility and predictability. Moreover the non-discrimination aspect should be covering all these principles as it is stated in the Strategy. The rest of the 10 Common Basic Principles for Roma Inclusion are not explicitly written down in the Strategy but still, some of them are present in all the key policy areas.

The document mentions principles in accordance with the 10 Common Basic Principles but lacks their effective cross-sectional usage, e.g. it has a chapter on non-discrimination but lacks relevant specific goals and measures in national goals and action plans in the four key areas; or states the principle of gender equality as a principle of implementation of the Strategy but the language of the whole text of the Strategy is not even gender sensitive (and again the goals and measures of the four key areas do not effectively reflect gender equality).

In case of the action plans the compliance with Common Principles and EU 2020 Strategy was not applied as they were prepared before the drafting of the Strategy. But it can be said that the Decade Action Plan lacks horizontal aspects such as gender equality or non-discrimination. In first and second quarter of year 2012 it is planned that new action plans will be drafted so it will be useful to see whether they are in accordance with the aforementioned documents.

- **To what extent does the NRIS comply with the 10 Common Basic Principles (annexed)?**

As mentioned above, the Strategy lacks effective cross-sectional use of horizontal aspects. In some cases the topics are mentioned but only in a very formal way. For example in the chapter education the second specific goal among others states “application of complex integration of gender sensitive and multicultural education in primary schools” but this sentence is hidden in a 12 lines paragraph that starts with the topic of improving motivation, results and attendance of Roma children in primary education and comprises around 10 other related topics. Moreover the indicators connected to this goal are: 1. proportion of 15 and more years old persons who left educational system with the ISCED 2 level achieved to 15 and more years old persons who left the school system; and 2. proportion of children from socially disadvantaged background attending the 9th grade of primary school in the overall number of children in the age of compulsory school attendance. This way of engraving principles into goals without specification and indicators is not an effective cross-sectional use of horizontal aspects.

Nevertheless the Strategy deals with principles as listed in the 10 Common Basic Principles. Some examples follow.

No. 1: The Strategy contains a separate sub-chapter on non-discrimination in the Priority politics of the Strategy chapter. In the chapter education we can find a similar example of setting a goal on non-discrimination as mentioned above concerning the gender sensitive and multicultural education. It lacks completely human rights approach and develops most of the goals and measures as social policy approach targeting mostly exclusively the so-called Roma marginalized communities.

No. 2: The Strategy complies with the requirement of explicit but not exclusive targeting although its targeting is not systematic. In the introduction part it states three target groups – Roma as national minority, Roma communities and Roma marginalized communities. This distinction is not further developed so it is not completely clear what each category means. Further in the goals and action plans parts this distinction is not used systematically and most of the time the Strategy uses only the denomination Roma without further specification.

No. 3: There is a mention about support of intercultural dialogue in the chapter on education done in a similar way as mentioned above about gender sensitive and multicultural education. The chapter Approaches toward the majority, which contains a paragraph on inclusive approaches, was already described above and is again more a formal fulfillment of the principle than a relevant part really aiming towards intercultural approaches in any field.

No. 4: The Strategy includes in its initial chapter a principle of desegregation that should govern all the Roma targeted policies. The part on desegregation contains also a statement that in local conditions it can happen that it is impossible to overcome segregation and thus it can be temporarily accepted under the condition of providing quality services. The global goal in education contains “accent on elimination of segregation” but specific goals

do not deal directly with this topic even though one goal deals with “solving problematic questions of education in special schools”. Concerning housing, a “need to support elimination of segregation” is stated in the global goal but not reflected in specific goals at all.

No. 5: Some aspects of gender dimension were already described above. The document, even though having some gender related goals and an overall principle, does not apply gender dimension systematically. It deals with multiple discrimination only in the opening general chapters and briefly in the non-discrimination one. In the chapter on employment one of the sub-specific goals states “create conditions for employment of mothers with small children” and the chapter on health deals with topics related to reproductive health. Domestic violence and exploitation are dealt with in a vague way stating to “realize awareness raising activities” and to “increase awareness” in these areas.

No. 6: There is no evidence of sharing experiences from abroad in the text of the Strategy. Concerning collection of data, a similar to the already mentioned sociographic mapping of Roma communities should be done by UNDP this year. The state of collection of data is nevertheless unsatisfying and a more systematic approach in this area should be adopted.

No. 7: The Strategy is mentioning legal anti-discrimination instruments in a separate part. The part mentioning European financial funds (described above) is very general and lacks critical evaluation of current use of structural funds, namely the implementation of the horizontal priority marginalized Roma communities.

No. 9 to 10: Even though the involvement of civil society and active participation of the Roma is not mentioned in the concrete policy goals, in chapter E there is a sub-chapter which elaborates on the role of non-governmental organizations. This chapter though is more a description of the state of Slovak Roma NGOs and of their need for support than a government statement about possible civil society engagement. It also contains a problematic part blaming pro-Roma NGOs for the state of Roma NGOs thus supporting cleavage amongst the civil society. The Strategy does not comprise concrete tools for development of civil society capacities. Also, the part E.3 which covers this topic does not fit into the chapter E – Implementation of the Strategy at all because it describes current situation of Roma and Non-Roma NGOs and elaborates on obstacles of functioning and surviving of the Roma NGOs. This part would be more suitable for the chapter D, which covers the policy goals, where it could be entitled support of Roma participation. As for the implementation process, the role of the civil society is therefore unclear.

For involvement of regional and local authorities see below.

5) Governance mechanisms: This section should explain how the regional and local authorities were consulted and what role they will play in implementing the strategies/policies. It should also indicate how the civil society (including Roma NGOs), social partners and other stakeholders (e.g. educational bodies, associations etc.) have been involved in the design and will be involved in the implementation and monitoring of national strategies or sets of policy measures.

- **With reference to Principle No. 8: What degree of consultation took place with regional and local authorities? What roles does the NRIS indicate for these authorities in implementing the strategies?**

The Office of the Plenipotentiary has organized three round table discussions for municipalities (in three different regions).

The Association of towns and communities of Slovakia, a representative body of the towns and villages whose main task is to present and advocate the common interests of its members, wrote the part of the Strategy concerning the role of partners in implementation of the Strategy on behalf of local authorities. This part is not setting the roles of partners; it is the Association's point of view on the situation and their recommendations for local authorities in respective areas. It is not consistent with the other Strategy's part and its declarations are not in any way binding.

- **With reference to Principles Nos. 9 and 10: Describe the process of consultation and engagement with civil society and Roma stakeholders and experts. Assess the quality of Roma participation and civil society consultation in the drafting, dissemination and discussion of the NRIS.**

The Office of the Plenipotentiary for Roma communities has organized three roundtable discussions with civil society representatives and one roundtable discussion with Roma representatives. On these round tables the first draft of the goals in the four key areas were presented and opened to discussion. Unfortunately, the comments were taken into account, e.g. the consortium of organizations implementing the OSI advocacy project has subsequently sent materials with recommendations for the goals in the four key areas and nothing was taken into account nor discussed. The events themselves did not leave much space for consultation as they had a prepared setting – presentation of the principles of the Strategy, presentation of the parts on the four key areas and discussion about what do the participants think about the goals. On the meeting with Roma civil society representatives concerns about evaluation, monitoring, responsibilities and financial allocations were raised. Even though the Office was searching for consensus, these parts, that should have received considerable attention, were not sufficiently developed in the Strategy.

It should be also added that one of the obstacles of effective consultations with civil society representatives was the time pressure under which was the Office of the Plenipotentiary preparing the Strategy (apparently having slowly started in September).

In the final stages there was a 5 working days period for ministerial and public comments. The consortium of organizations implementing the OSI advocacy project has submitted 85 comments, from which 8 were substantial conceptual ones, supported altogether by 19 NGOs and several individuals that were not at all taken into account.

As it is stated in the Strategy, during the drafting process there were extensive consultations with international organizations like UNDP and World Bank, which prepared the documents and expert analysis for the Strategy. The work of the World Bank was paid from a contract between the Bank and the ministry of labour.

As mentioned above the role of local and regional authorities as well as the civil society is described in separate chapters (even though the Strategy does not say anything relevant to their possible future role). However, the Strategy does not mention the role of the relevant ministries and public bodies. These are of a crucial importance as they have legislative power and thus can issue binding instructions towards the local levels.

Also the description of the role of academic institutions and religious organizations lack in the document.

6) Monitoring the implementation of the strategies/policy measures and adjusting them in time: This section should describe the domestic monitoring methods and mechanisms to self-evaluate the impact of national strategies or sets of policy measures. It should also describe the review mechanisms to ensure that the strategy remains flexible and adapted to the changing circumstances.

- **Assess the adequacy of monitoring methods and mechanisms outlined above.**

The monitoring and evaluation of the Strategy is elaborated in the chapter F. Generally this chapter provides only goals and portrays the plans of how the monitoring and evaluation should look like in the future. It does not stipulate clear monitoring and evaluation methods and mechanisms but rather presents the plans and lists the preconditions for the creation of effective and reliable monitoring and evaluation frame.

Moreover in this short text there is often a confusion of terms monitoring and evaluation and so it is unclear what steps are going to be taken in these two areas. The emphasis is given more on the evaluation of the Strategy than on its monitoring processes.

Even though the monitoring and evaluation of the Strategy is one of the most important aspects, the submitters did not elaborate on it a lot. Therefore it should be rewritten in order to give clear vision of the monitoring and evaluation processes which would be applied throughout the implementation of the Strategy. Proper outputs of these processes will be of a crucial importance in future action plans and responses to the obstacles and challenges of the Roma population.

- **Does the government collect and disseminate adequate disaggregated data to measure progress on integration? If not, what indication does the NRIS contain concerning plans to do so between now and 2020?**

The Strategy mentions, as one of the biggest problems of proper monitoring and evaluation, the lack of ethnic data and obstacles in their collections. Even though there will be several researches and data collections in the year 2012, a comprehensive data collection system is not available and no public discussion was so far opened on this topic. Thus it would be more than appropriate if the Strategy could provide a plan and a timeframe which would deal with the creation of adequate data collection mechanism, financial allocations needed for such collection and bodies that could be involved in the data collection.

7) **Details of the National Contact Point:** The document should indicate the contact point (including contact details) and its mandate to coordinate the development and implementation of the strategy/policies.

- **What is the structure and mandate of the National Contact Point? Is the resource allocation to the NCP proportionate to the task of coordinating the development and implementation of the NRIS?**

The National Contact Point in the Slovak Republic is the Office of the Plenipotentiary of the Slovak Republic for Roma Communities. The Strategy mentions that it has the coordinating role and its main task is to monitor and analyze the implementation processes and follow the global goals in order to have an integrated approach towards the Roma minority.

However, the Strategy does not provide a more extensive and detailed description of the tasks, obligations and roles of the Office which would be very convenient. There are only few sentences about the role of the Office in general, which is derived from its establishing documents and then the mandate for the Strategy is only mentioned but not explained. Nor the budget or any financial allocations are mentioned regarding the development and implementation of the National Roma Integration Strategy.

From the establishing documents of the Office of the Plenipotentiary it is well-known that the powers of this Office are not very strong and that it does not have binding competences. Thus it would be very useful to elaborate more on its role in the Strategy, so that it is clear how far it can go in the implementation process and what tools the Office can use.

INDICATIVE LISTING: Below is an ‘indicative listing’ of the potential measures which can be considered in the four priority areas of education, employment, health, and housing.

Key:

✓ = included in NRIS, ½ = included in NRIS but not clear enough, ✗ = not included in NRIS

EDUCATION measures directed at:

- ½ Preventing discrimination or segregation of Roma children at school
- ✓ Providing Roma children with sustainable access to quality education
- ✓ Widening the access to quality early childhood education and care
- ✓ Completion of primary education by all Roma children
- ✓ Reducing the number of early school leavers from primary and secondary education
- ✗ Increasing Roma youngsters' participation in tertiary education
- ✗ Increasing the use of innovative educational approaches such as ICT-based access to learning and skills

EMPLOYMENT measures directed at:

- ½ Providing non-discriminatory access for Roma to vocational training, to the job market and to self-employment tools and initiatives
- ✓ (*in the Financial inclusion chapter*) Providing access to micro-credit
- ✗ Employing Roma civil servants in the public sector

- ½ Employment Services to reach out to Roma by providing personalized services and mediation
- ✓ Attracting more Roma on the labour market (involvement of the social partners/business associations etc.?)

ACCESS TO HEALTHCARE measures directed at:

- ✗ Providing access to quality healthcare, with particular attention to women and children
- ✓ Providing access to Roma to preventive care and social services
- ✓ Involving qualified Roma in healthcare programs (role of mediators)

ACCESS TO HOUSING AND ESSENTIAL SERVICES via measures directed at:

- ½ Providing non-discriminatory access to housing, including social housing
- ✗ Implementing an integrated approach, of which housing intervention is part
- ✗ (*not applicable in the Slovak context*) Addressing the special needs of non-sedentary Roma population, where applicable
- ✗ Providing details of the means of involvement of regional and/or local authorities as well as local Roma and non-Roma communities

Background Note on the Slovak NRIS

By Sandor Karacsony, Consultant to the Open Society Roma Initiatives and Advisor to the Plenipotentiary for Roma Communities

The Slovak NRIS has been prepared through a unique collaborative arrangement in which the Open Society Foundations – in addition to providing support for civil consultations – funded an advisor for strategic and analytical support as well as capacity building to the Office of the Plenipotentiary for Roma Communities. The drafting team has also drawn upon data and findings from the 2011 UNDP/WB Roma household survey so as to support evidence-based policy recommendations, and has benefited from consultations with World Bank staff on priority areas and M&E. What differentiates this strategy from earlier ones prepared in Slovakia, as well as – to some extent – other NRIS in the region is a strikingly honest and critical tone, and a strong recognition of systemic segregation and discrimination in key sectors (education and health in particular). This paper is also the first one to provide a strong theoretical framework on the different levels along with the consequences of discrimination. Furthermore, the NRIS introduces cross-cutting areas (financial inclusion, anti-discrimination and targeting the majority population with communication: the government is developing detailed actions plans on all these areas still to be submitted before the early elections in March) in addition to the priority areas identified by the Framework, and also provides an outline for developing an M&E framework. In the course of the next few months, the World Bank is going to provide analytical support to the government of Slovakia through a contract with the Ministry of Labor, Social Affairs and Families on (i) making the case for inclusion through calculating the cost of exclusion in Slovakia; (ii) analysis of household data and policy recommendations the priority areas and financial inclusion; (iii) more and better use of EU instruments; (iv) M&E at the policy and

project level. This work is being done in strong collaboration with OSF and local NGOs, and draws strongly on the comments provided during the drafting phase of NRIS. Furthermore, the Open Society Foundations' "Making the Most of EU Funds for Roma" (MtM) initiative plans to assist the government with a review of the comprehensive framework, which – combined with the poverty map of Slovakia to be developed by end-2012 – will provide strong inputs for the government's preparations for the next programming period.