European Commission

Roma Civil Monitor

A synthesis of civil society's reports on the implementation of national Roma integration strategies in the European Union

Assessing the progress in four key policy areas

Prepared by:
Center for Policy Studies
Central European University
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Roma civil monitor pilot project

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Directorate-General for Justice and Consumers
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The report is based on national monitoring reports developed by more than 90 civil society organisations and individual experts in 27 Member States. The NGOs and individual experts were provided with the draft of this report for verification of the information concerning their countries. Authors of this report would like to thank those who commented on the draft and provided their comments.

The report has been prepared as part of the Roma Civil Monitor pilot project, "Capacity-building for Roma civil society and strengthening its involvement in the monitoring of National Roma Integration Strategies". The pilot project is carried out for the European Commission, DG Justice and Consumers. It is coordinated by the *Center for Policy Studies* of the Central European University (CEU CPS), in partnership with the European Roma Grassroots Organisations Network (ERGO Network), the European Roma Rights Centre (ERRC), the *Fundación Secretariado Gitano* (FSG) and the Roma Education Fund (REF) and implemented with more than 90 NGOs and individual experts from 27 Member States.

CONTENTS

LIST OF ABBREVIATIONS

ALMP	Active Labour Market Programmes
CEE	Central and Eastern Europe (in the context of this report often referring to the subset of Central and Eastern European countries with the largest disadvantaged Roma populations: Bulgaria, Czech Republic, Hungary, Romania and Slovakia)
EC	European Commission
ECEC	Early Childhood Education and Care
EEA	European Economic Area
ERDF	European Fund for Regional Development
ESF	European Social Fund
ESIF	European Structural and Investment Funds
EU	European Union
EU-MIDIS II	Second European Union Minorities and Discrimination Survey
FRA	European Union Agency for Fundamental Rights
GDP	Gross Domestic Product
NEET	Not in Employment, Education or Training (young people)
NGO	Non-Governmental Organisation
NRIS	National Roma Integration Strategy
PES	Public Employment Services
RCM	Roma Civil Monitor pilot project
SEE	South-Eastern Europe

Note on terminology

Unless otherwise specified, this report uses the term "Roma" as an umbrella term including Roma, Sinti, Travellers, Rroms, Kalé, etc., as well as for the population administratively designated as *Gens du Voyage*, people identifying themselves as Gypsies and other groups.

EXECUTIVE SUMMARY

Employment

In all Member States, Roma find themselves in an unfavourable labour market position compared to the non-Roma population as they are less likely to be in employment. This is partly due to their low average skill level which is directly linked with the deficiencies in the education system. The share of Roma with incomplete primary education is especially high in countries where Roma/Travellers are (semi-)itinerant, and/or where a large share of Roma lives in segregated communities. The other most important reason is discrimination and other manifestations of antigypsyism. Among other barriers cited in the country reports, there is a lack of documented labour market experience or constraints to geographical mobility, indebtedness and disincentives in the social benefits system.

The available data on labour market exclusion is often incomplete or biased. This implies that short- and medium-term developments cannot be properly monitored in most countries. Additionally, self-reported ethnicity in population surveys is likely to be biased and is seldom supplemented with alternative data collection methods. Unemployment registers typically include information on job search, benefit receipt, and participation in active labour market programmes. Thus, a common problem in programmes that are broadly targeted at disadvantaged groups is that there is no information on whether Roma jobseekers have equal access or to what extent the programmes improve their chances of labour market integration. This problem was noted both in Western and Eastern Member States.

Generally, unemployed Roma are referred to public work programmes that do not effectively improve their chances of labour market reintegration. Alternative solutions such as transit employment programmes or social enterprises (that could be linked to the community development programmes and driven by local public authorities – as successfully piloted in some municipalities in different Member States) are not widely used.

The intra-EU mobile Roma and third-country nationals are also in particularly vulnerable situations, as they are at risk of becoming victims of exclusion from the labour market and public employment services, exploitation and discrimination, mainly due to lack of local labour markets, legal frameworks and support.

Housing and essential public services

The improvement in the housing situation of Roma has not kept pace with the economic development and progress made across the EU. Despite the slow amelioration, which has been partly achieved by planned and programmed upgrading interventions, there is still a 20-40 years gap between the general population and the Roma population's housing conditions. In the post-2008 context, especially in the CEE and SEE Member States, several reasons for the slow pace of development are linked to – among other factors – austerity policies in housing provision, reduction in public spending, lowering restrictions on private housing development and encouraging the growth of private ownership and private rental sector.

Roma do not have access to adequate housing in the EU. Across Member States, there are public policies that specifically hinder access to housing or regulations and allocation techniques of social benefits that put Roma in a disadvantaged position. In general, protection from discrimination in the housing market remains ineffective.

Some EU countries have launched interventions aimed at development of the access to basic amenities and infrastructure or have supported proactive local initiatives to help facilitate access to social housing. Such interventions, however, seldom tackle the problem of the residential segregation of Roma that remains among the main shortcomings of the Roma inclusion policies across the EU.

The programmes concerning the housing of Roma may directly or indirectly improve the situation in housing legalisation and upgrading, as well as small-scale desegregation initiatives. However, the sustainability and effect of such initiatives remain limited. The reason is that in many countries, the housing policy (including social housing) and social housing benefits are decentralised to the local community/municipality level. This, in turn, hinders structural changes in the housing conditions of Roma.

Impact of health care policies on Roma

In most EU countries, access to general health care services is conditional on being covered by health insurance. Is several SEE countries but also in some Western Member States that are target countries of the intra EU-mobility and immigration from third countries, excluded communities like Roma are often among those who are left out of health insurance coverage because of an inability of paying the required contribution, as well as the limited know-how with respect to navigating the health bureaucracy, the lack of "habitual residency", language barriers, less conventional work history or unconventional immigration status.

An additional barrier is the physical accessibility to, low capacity of or vacant positions in health services that is significantly worse in ethnically homogenous and segregated areas inhabited by sizeable Roma communities. As such, consequences include non-vaccinated children, delayed or absence of primary healthcare or long waiting times in overcrowded hospitals. Despite the availability of EU support and funding in Member States, the allocation of necessary resources for the implementation of policies aimed at improving the access to healthcare for marginalised Roma, as well as improving their health condition, remains weak.

In some countries, programmes of Roma health mediators have proved to be an effective tool for overcoming the structural barriers (albeit secondary – as they do not address their causes) that Roma face in accessing and benefiting from the availability of healthcare services: they contribute to facilitating dialogue with patients, prevent conflicts, and assist patients with key information. The experience has also demonstrated that involvement of Roma in the design, implementation, and monitoring of Roma-specific health policy measures is crucial.

A lack of reliable administrative health data collection disaggregated by ethnicity represents another obstacle that prevents the necessary analysis of the health gap between the Roma and non-Roma population, and development of adequate measures.

Education

Planning of educational and inclusion policies for Roma has been tailored within the limits of the political will and financial possibilities of each Member State. However, in reality, their implementation is hindered by insufficient funding, poor implementation efforts, limited scope, and improper design. Consequently, these factors have an even lower impact than envisioned in the limited plans.

Access to early childhood education and care (ECEC) services is growing, although some Member States still do not have compulsory preschool with a disproportionate impact on the school readiness of Roma children. Besides the lack of available ECEC services, barriers in access also include poor transportation infrastructure and costs. Segregation and physical distance to quality ECEC services are growing in many countries and regions, as well as the lack of physical infrastructure and available places. Thus, while the right to access ECEC has increased through policy developments, many children still cannot reach quality services.

Member States' main interventions to improve Roma inclusion are the use of assistants, mediators and mentors in localities and schools where there is a large Roma population. This practice has shown to be effective in increasing access, improve educational outcomes, and reduce dropout rates. However, such partial measures cannot substitute

the wider reform of the education system targeting higher educational effectiveness and inclusiveness, much-needed in many Member States. The scope of these targeted measures is limited and cannot provide assistance to the extent that is necessary. It is important to acknowledge that the practice of using mediators reduces the self-efficacy of teachers and school systems in educating Roma students and classes with Roma pupils.

Member States do not recognise how experiencing discrimination and other manifestations of racism against Roma students and their families influences their educational motivations and aspirations, but instead calism it is the responsibility of the community to increase their aspirations. Policies or interventions that address teachers' bias or discrimination and antigypsyism in education are rare and mostly limited to small-scale or one-off interventions.

Segregation in education is worsening in several Member States and there are no effective strategies or laws to ensure the access to quality, integrated, and inclusive education. In Member States that are under infringement procedures for educational segregation, little progress and even increased segregation is reported. Where the majority of Roma students is learning, the quality of education is significantly lower than the national average, including facilities, equipment, teaching methods, and motivation.

EU-mobile Roma, specifically Roma from CEE and SEE benefiting from the freedom of movement within EU, or third-country nationals immigrating to Western Member States, face specific educational challenges, which Member States have difficulties in addressing. Monitoring reports from Western European Member States depict how the local and national policy and programme reactions are producing both residential and educational segregation, which are included within school segregation.

INTRODUCTION

This report summarises findings from country reports developed by more than 90 non-governmental organisations and individual experts from the civil society in 27 EU Member States[1] participating in the second monitoring cycle of the pilot project "*Roma Civil Monitor: Capacity-building for Roma civil society and strengthening its involvement in the monitoring of National Roma Integration Strategies*". Civil society's monitoring of the implementation of the National Roma Integration Strategies and other policies with impact on Roma inclusion/exclusion provides important complementary data to the reports and evaluation exercises related to the 2011 EU Framework for National Roma Integration Strategies, such as:

- its external mid-term evaluation published in 2018 examining the relevance, effectiveness, coherence, efficiency, and the EU-added value of the EU Framework,
- Member State governments' self-reporting to EC on implementation of their respective national Roma integration strategies that have been summarised in EC's annual reports since 2016,
- quantitative data on the situation of Roma in EU countries collected by the EU Agency for Fundamental Rights (FRA) that contributes to the assessment of the achieved progress/regress and trends.

Particularly, the reports developed within the Roma Civil Monitor pilot project inform of the actual obstacles that Roma still face when accessing public services and exercising their rights. In addition, it provides up-to-date examples of policy interventions designed to address the needs of Roma, which have shown promising results, and which indeed contribute to strengthening the pathway towards a more inclusive society. The qualitative insights provided through the civil society's reports are of significant usefulness, especially when analysing the outreach of the large mainstream programmes targeting Roma and their impact on Roma inclusion, particularly because of the lack of ethnic data collection. The insights provided by the civil society are often based on the authors' own experience and their familiarity with the situation of Roma, as well as on interviews conducted with the closest stakeholders, and on personal testimonies of Roma individuals.

The Roma Civil Monitor's **first annual cycle** reviewed key structural preconditions of successful implementation: governance and overall policy framework (including coordination structures, use of European Structural and Investment Funds, Roma participation, the situation of Roma women, youth and children and other topics), fighting discrimination and antigypsyism, and for the five countries with the largest Roma populations also the impact of mainstream education policies on Roma. The civil society's findings are available in country monitoring reports, two synthesis reports (one focusing on the five countries with the largest Roma communities – Bulgaria, Czech Republic, Hungary, Romania, Slovakia; and the second synthesis report covering all 27 Member States) and summarising fiches.

The present report summarises the content of the country reports produced in **the second annual cycle** focused on the four main policy fields relevant for Roma inclusion: education, employment, impact of healthcare policy on Roma and housing and access to basic infrastructure, each of them specifically examining the problem of discrimination and racism experienced by Roma. It was developed by experts in the four fields, using the information from the civil society's country reports. The draft was verified for accuracy by the local NGOs from all 27 participating Member States.

[1] Malta has not been included in the pilot project.

While writing the Roma Civil Monitor country reports, the local NGOs have necessarily taken a domestic perspective in assessing their governments' actions towards Roma. The authors of this synthesis have tried to capture the European dimensions of the national policies as well – challenges related to the exercise of the right of free movement of the European citizens within the European Union or the situation of particularly vulnerable third-country nationals.

One could try grouping EU countries into a simple clustering, but such exercise seems neither possible nor meaningful, as the problems related to social exclusion and racism against Roma that the Member States and their societies face are manifold and policymakers have a different understanding of the problems, approaches (that can diverge from one policy field to another) and priorities (often not driven by the problems themselves), while responsible authorities are progressing at different speeds and with different outcomes in implementing Roma inclusion policies. The civil society, too, emphasises different elements in the multifaceted problem of Roma exclusion. The Roma Civil Monitor country reports, however, show that in countries with stronger social inclusion policies, the (pro-)Roma civil society is more concerned with issues related to the racism experienced by Roma, while in countries with less robust welfare systems (or those that factually exclude the access of specific groups, such as some EU-mobile persons) the focus is on the access to and effectiveness of public services. Thus, instead of clustering countries, it seems more useful to speak on the one hand about shared problems that should drive concerned Member States' Roma inclusion strategies; and on the other hand, about similarities/differences in public policies and practices that can answer these drivers and provide material for policy learning.

However, if one key factor should be selected for clustering countries, the problem (presence or absence, form) of residential segregation should be strongly considered. Residential segregation has many forms: territorial concentration of vulnerable Roma population in neighbourhoods physically or symbolically separated from the mainstream society, remote settlements, whole segregated villages or even micro regions – that have emerged as a consequence of historical development, longer demographic trends, economic pressures, discrimination in access to mainstream housing in ethnically and socially mixed neighbourhoods, public authorities' deliberate segregationist accommodation and spatial planning policies, or Roma's choices motivated by seeking for security (that can only be hardly considered as a genuinely free choice) – as well as halting sites for the non-sedentary population available far away from the mainstream population and services; and each of them requires different policy answers. However, what all of them have in common is that they lead to the deprivation of their inhabitants of access to quality public services (in best case, parallel services with significantly worse quality appear, such as segregated education; in worst case, such services are not available at all) and the labour market – both necessary for successful social, economic and citizen participation.

Moreover, reducing segregation must be a part of any effort aimed at tackling antigypsyism, as a recent study conducted on 3,430 students from the Roma minority and the non-Roma majority in 82 schools in Hungary has demonstrated.[2] This study provides strong evidence that a combination of desegregation efforts and reduction of the social status gap (in this case, expressed in school performance) between the Roma and non-Roma translates into positive inter-group relationships. The authors argue in favour of supporting Roma students in mixed schools as it helps them both on the long term – by obtaining higher quality education that will prepare them for the labour market – and on the short term, as success in school implies gaining friends. The study simulations "*suggest that a policy that combines desegregation and closing the achievement gap can improve*

[2] Hajdu, T., Kertesi, G. & Kézdi, G. (2019). *Inter-Ethnic Friendship and Hostility between Roma and non-Roma Students in Hungary: The Role of Exposure and Academic Achievement*. In the B.E. Journal of Economic Analysis & Policy, 19(1). Retrieved 11 February 2020.

the social relations of minority students both in terms of having more friends and having more of their friends from the majority". We can add that only experience from the ethnically mixed educational environments supporting all children and youth in need, can prepare them to consider inclusiveness as a basic norm in all spheres of life.

EMPLOYMENT

Roma's participation in the labour market

In all countries, Roma are in a considerably disadvantaged labour market position: they are less likely to be in employment and more likely to be unemployed or inactive than the non-Roma population. If employed, Roma are more likely to work informally, in unstable and low-paid jobs, or in unsafe or degrading working conditions. In most countries, the employment gap between the Roma and non-Roma population is significantly higher among women than among men. For all labour market indicators,[3] the gap is larger in countries where Roma communities are small (such as Finland), as well as in countries where most Roma are recent immigrants (for example, Denmark). The labour market disadvantage experienced by Roma is persistent, though Croatia or Slovakia have reported some improvement in recent years, mainly due to the overall increase in the demand for labour as a consequence of the overall economic development in these countries.

The reasons behind the labour market disadvantage of Roma are similar in all countries. The main explanation is the low average skill level of Roma populations, which points to deficiencies in the education system. The percentage of Roma with incomplete primary education is especially high in countries where Roma/Travellers are (semi-) itinerant and/or where a large share of Roma lives in segregated communities.

In post-socialist countries, most Roma finish primary school but only a few complete secondary education. Romania, where graduating from primary school remains a challenge, is an exception. Beside low skills, the second most commonly cited reason is employment discrimination. Some reports also mention constraints to geographical mobility, indebtedness and disincentives in the social benefits system. The lack of documented labour market experience may be an additional obstacle in some countries, such as Spain.

Intra-EU mobile Roma (EU citizens living and working in a different European country than the country of their citizenship) and third-country nationals (non-EU citizens) are in a particularly vulnerable situation. Because of the lack of local labour markets, legal frameworks and support, they are at an increased risk of becoming victims of exclusion from the labour market and public employment services, exploitation, and discrimination. Such problems were reported in Germany, where many Roma from Romania or Bulgaria work in precarious conditions, for low wages and without insurance. They are not able to seek justice if their rights are violated or if they do not receive their salary because they do not speak the local language and do not know local regulations. Another example is Denmark, where intra-EU mobile Roma face exclusion from access to jobs due to the lack of civil registration number (CPR).

Data availability and quality

The available data on labour market exclusion is often incomplete or biased. Several countries record Roma ethnicity in national censuses, including UK or CEE Member States, while Ireland collects data on Traveller ethnicity[4], while some countries include it in regular population surveys, such as Spain. Only Hungary is known to collect ethnic data during its quarterly labour force surveys. This implies that short and medium-term developments cannot be monitored in most countries. Additionally, self-reported ethnicity in population surveys is likely to be biased and should be double-checked with alternative data collection methods. Some countries, like Bulgaria, also record ethnicity in administrative registers, such as the unemployment register. While such data is useful, it also has several limitations. Unemployment registers typically include information on job search, benefits

[3] Including the rate of employment, unemployment, informal work, and wage levels.

[4] The Irish Census 2021 will, for the first time, collect data on Roma as a distinct ethnic group.

receipt and participation in active labour market programmes (ALMP) but include limited data on employment. They are also likely to be plagued both by underreporting and over-reporting of ethnicity: Roma jobseekers may hide their identity in fear of being discriminated against, while some non-Roma jobseekers may self-declare as being Roma if this facilitates access to some targeted ALMP.

Data availability tends to be better in CEE countries where the percentage of Roma is relatively high. Data collection on Roma labour market participation seems somewhat more comprehensive and regular in post-socialist countries (even where the Roma represents a tiny minority, as in Latvia and Lithuania) compared to Western Europe. However, data is not necessarily easily accessible for researchers and NGOs in these countries.

Access to and effectiveness of public employment services

Most countries where Roma represent a significant share of the population have a dedicated Roma strategy. In other countries where the Roma community is relatively small, in most cases, measures to promote the integration of Roma are embedded into broader social inclusion and poverty alleviation strategies. However, there are notable exceptions to this pattern. Despite the presence of sizeable Roma communities, France, or Germany have no dedicated strategy for Roma inclusion. By contrast, Austria, Croatia, Lithuania and Slovenia have each developed a specific strategy for integrating the Roma community.

Labour market integration is a top priority in almost all NRISs, except for those few where the focus is on social inclusion, such as in Slovakia. However, the aims are typically defined in vague terms: none of the country reports mention whether their specific NRIS includes measurable numerical targets regarding employment or unemployment among Roma. Government strategies tend to focus mainly on the supply side (i.e. improving the employability of Roma), while there are few measures to tackle demand constraints and employer discrimination in particular.

In CEE countries, government capacity to design and implement effective policies is generally limited. Though this has not been explicitly discussed in the country reports, the general lack of Roma-specific indicators and the apparent lack of tailoring policies to the needs of Roma jobseekers suggest that Roma-specific active labour market policies are not monitored in a comprehensive manner, nor are there mechanisms in place to ensure that ineffective policies are identified, adjusted or discontinued. Weak monitoring is especially relevant in CEE countries with the largest Roma populations, where the problem is not so much the lack of policy measures but rather the effectiveness of the existing policies. This underlines the need for monitoring and pressure by local advocacy organisations, as well as by the EU.

Another barrier to further policy development is weak political commitment. Especially in countries where the Roma represent a small percentage and Roma advocacy organisations are also small and lack capacities, there seems to be little internal political pressure on governments to invest in developing and implementing effective policies to support the labour market integration of Roma. In these countries, sharing examples of good practice in policies that proved effective in similar contexts, combined with capacity-building for local NGOs, may help by enabling local advocacy organisations to be more convincing in their lobbying for improvement.

Main tools for reducing labour market exclusion

In the CEE countries with the largest Roma populations, government strategies delegate the task of increasing Roma employment to the public employment service (PES). In Bulgaria and Romania, this is supplemented by regional programmes targeting areas that are highly populated by Roma. These programmes are usually funded by the ESF. In most of these countries, the PES is understaffed and, despite offering a broad range of services, these are not tailored to the needs of Roma or not very effective in improving their employability. Most unemployed Roma are poorly educated and face multiple social problems. They need basic skills training and second-chance education programmes combined with counselling and mentoring, as well as incentives for employers to mitigate

discrimination in the workplace.[5] However, such integrated services are not available; or Roma's access is limited by the lack of service capacities and/or outreach and bridging programmes that would encourage low-educated Roma to use PES services. Moreover, Roma communities often live in disadvantaged rural areas where public transport is infrequent and expensive. Another disadvantage that a part of marginalised Roma face in some countries, such as in Slovakia, is that they do not speak well the language of the country and in which the information and services are provided (or do not understand well the formal language); this creates a further barrier to accessing PES services.

Unemployed Roma are typically referred to public work programmes that do not effectively improve their chances of labour market reintegration. Alternative solutions such as transit employment programmes or social enterprises are not widely used, though there are sporadic examples, such as Slovakia. Public work programmes are especially large in Hungary and Slovakia. There is a risk that young Roma are attracted to and then get trapped in public work programmes due to lack of alternatives. In Hungary, the recent reduction of the maximum age of compulsory education and the lack of access to good quality training in basic skills and second chance school programmes augments this risk.

There are a few notable exceptions to the above general picture. Bulgaria has introduced Roma mediators and youth mediators to support outreach, though both programmes need to be strengthened in terms of capacity and reliance on field work. Romania has specific outreach measures for NEETs. Slovakia introduced new rules on personal bankruptcy to tackle debt-traps and reduce usury, which is a wide-spread problem especially in segregated rural areas. In the Czech Republic, the Government Agency for Social Inclusion promotes anti-discrimination and coordination of employment and social services at the local level. There are also several innovative, albeit small NGO projects in CEE countries that promote labour market integration, e.g. microcredit schemes and mentoring for better educated Roma in Hungary.

In disadvantaged areas, PES services need to be linked to community development programmes to increase the supply of labour and to tackle the multiple disadvantages Roma face in education, housing, health, basic infrastructure and public transport. Such programmes are not in place in CEE countries with the largest Roma populations, or do not cover all the necessary policy areas. As noted in the Romanian report, it is especially important to involve local authorities in designing and implementing such programmes. This applies to the other countries as well.

In other countries where the percentage of Roma is lower but still significant, there is considerable variation in the main tools for Roma labour market integration. Most of these countries – Greece, France, UK – allocate the task to the PES, but there is a variety of alternative solutions. For example, while Germany uses regionally targeted ESF programmes for disadvantaged groups, Spain provides government support (with co-funding from the ESF) to "*Acceder*", a nation-wide NGO programme for Roma jobseekers (beside small-scale targeted programmes of the regional PES); this programme deserves special mention as it has been promoted as best practice (for example, its replication in Southern Italy was planned). Italy only has small scale and isolated local programmes for Roma and other disadvantaged groups.

In France and the UK, mainstream PES services are generally available and adequately funded. However, the existing programmes are not tailored to the needs of Roma jobseekers. Although there may be high quality training programmes available, Roma jobseekers may not profit from these if they lack the basic skills required upon entry. Also, the lack of language skills and stable housing may complicate access to PES, especially among recent immigrants and Traveller communities. In France, foreign citizenship and lacking a bank account were also cited as important barriers. In the UK, there have been

[5] Note that, though targeted support for self-employment and for Roma-owned businesses may be useful (as was proposed by the Czech report), it is unlikely to provide a solution for most Roma who lack seed capital and education and are facing a highly bureaucratic business environment.

some recent initiatives to improve access by Roma, such as the "5 Cities Project", launched in 2018 that aims to increase the number of people in underrepresented groups who take up apprenticeships. The Greek strategy is notable in that it includes new measures that are tailored to the needs of Roma jobseekers and mechanisms that facilitate outreach to economically inactive Roma, as well as the coordination between social and employment services. For example, one measure in Regional Operative Programmes is to provide counselling and mentoring services to Roma engaged in entrepreneurial activities to improve their efficiency and/or to support the formalisation of informal activities (which is wide-spread among the Roma in Greece).

A common problem in programmes that are broadly targeted at disadvantaged groups is that there is no information on whether Roma jobseekers have equal access or to what extent the programmes improve their chances of labour market integration. This was noted in the case of France, Germany, and the UK.

Finally, in most countries where Roma represent a small percentage of the population, the labour market integration of Roma is delegated to the PES, and in most cases, there are no Roma-specific programmes. A few countries, such as Finland, focus on social services. Access to mainstream PES services is often limited by lack of information, travel costs, or language barriers. The Estonian report notes that Roma often have low trust in PES services and regard the PES as a controlling authority.

Only a handful of these countries have introduced additional measures to improve access to employment and/or related social services. There are Roma mediators in Belgium, Latvia and Sweden; diversity training for public officers has been introduced in Belgium, Sweden, and Slovenia. Latvia set up a platform for cooperation between jobseekers, employers and social partners. There are a few countries – Austria, Finland, Lithuania, Poland – that have launched new ESF-funded projects specifically aiming at Roma integration. In the majority of cases, these projects are implemented by NGOs or local governments. In Lithuania, the new projects are implemented by Roma NGOs in partnership with the PES. In the case of Austria, the new funding mechanism has significantly increased the range and accessibility of NGO-run programmes since 2015. In Finland, it is notable that some of the new programmes include explicit efforts to reach out to economically inactive Roma. Lastly, a few countries have taken measures against employer discrimination. Croatia introduced targeted visits to employers by PES counsellors to sensitise and inform them about available active labour market measures and possibilities to employ Roma. In Sweden, a few PES offices reported to have started a dialogue with employers on hiring Roma. Ireland has plans to support the hiring of Roma in the public sector.

Tackling employer discrimination

Anti-discrimination legislation is in place in CEE Member States with the largest Roma populations and there is systematic monitoring by dedicated equality bodies in most of them. Bulgaria is an exception, with no systematic analysis available on the labour market discrimination against Roma. The Commission for Protection against Discrimination has no accessible public register on Court decisions. However, the law enforcement is also weak in all CEE Member States, except for Romania. In Bulgaria, the central government has not taken action in this area but there are some initiatives by municipalities and NGOs to prevent discrimination or support victims. Overall, there is a need to strengthen the monitoring of compliance with and enforcement of anti-discrimination legislation in CEE Member States with large Roma communities.

National legislation prohibits discrimination on ethnic grounds in the labour market also in countries where the Roma represent a small percentage of the population. In most of these countries, though equality bodies exist, the monitoring of compliance and enforcement is weak. This is often the case because victims are not aware of their rights or do not file complaints fearing that they may lose their job. Appeal procedures and support services for victims also tend to be weak in most countries. In some countries, especially where Roma advocacy is generally well-organised, NGOs have taken over the role of monitoring and publish regular reports on labour market discrimination or anti-discrimination and sensitisation training (Germany, the Netherlands, and Spain). In a few countries (Greece),

the relevance of legal measures is limited as Roma are predominantly self-employed or work in unregistered jobs on the basis of informal contracts.

In the Netherlands, though ethnic profiling is prohibited, Roma who arrived from socialist countries in the 1970s and 1980s can often be easily identified. Though some received a Dutch residence permit in the so-called "General Pardon" in 1978, their ID still describes them as stateless or of an unknown nationality. This can be used by employers to screen Roma applicants in the hiring process.

Despite the general weakness of monitoring and enforcement efforts, there are some important exceptions. In France, the equality body (Defender of the Rights, DDD) has published several reports on discrimination affecting Roma and Travellers and issues legal reminders to public and private administrations, as well as recommendations to the State. In Ireland, the Workplace Relations Commission[6] recorded 671 individual complaints of discrimination under the Employment Equality Acts 1999-2015 in 2017, including cases filed by Travellers and Roma. In Belgium, the Belgian Equal Opportunity body UNIA regularly monitors and reports on cases of employment discrimination on the basis of ethnicity in job advertisements, the hiring process and the workplace. In Luxembourg, the Centre for Equal Treatment (CET), the national equality body, is an independent institution which promotes, analyses and monitors equal treatment between all persons. However, as ethnic data is not registered in Luxembourg, there is no information available about the number of complaints filed by persons of Roma ethnicity. In 2018, CET and the Chamber of Employees issued a practical guide for employees, which includes information about the legal framework and presents examples of different types of discrimination and means of actions.

There are also some recent government initiatives to further improve monitoring. After completing the Race Disparity Audit first published in October 2017, the UK government launched a website to shed light on ethnic disparities across society including in employment, unemployment, pay, business, and the public sector workforce. In Belgium, UNIA is currently pushing for the use of strategies such as "discrimination testing" and "mystery shopping" in order to uncover discriminatory behaviour by employers towards foreigners and minority groups.

There is a general lack of government actions to raise awareness and introduce incentives against employer discrimination. With the exception of Croatia, the PES does not explicitly address employer discrimination. So far, such initiatives have come mainly from the NGO sector. For example, a recent awareness-raising campaign of the NGO *Împreună* Agency in Romania involving more than 100 Roma professionals sharing their educational and professional experiences (ESF-funded). Or, a spontaneous bottom-up initiative of hundreds of Roma publishing photos of themselves at work on social media, which was meant as a protest reaction to repeated statements of the Czech President, Zeman, attacking Roma that "they do not work".

In a few countries, there are some recent government initiatives to tackle employer discrimination. In Croatia, the Ombudsperson's office is organising seminars for employers, police and other relevant public bodies, the Central Employment Office works with employers, and the Government Office for Human and Minority Rights (which is the Roma National Contact Point) is working on preventing discrimination at the national level. The Portuguese Operational Social Inclusion and Employment Programme (POISE) launched in June 2018 includes, among other things, measures to raise awareness among employers to challenge their prejudice and to support equal opportunities, but these have not been implemented yet.

Affirmative action in hiring Roma in the public sector is not part of standard practice in any of the EU countries. However, there are small scale initiatives in place, such as internship programmes in the public media in Hungary. In Greece, when Roma mediators were hired

[6] The Irish WRT is an independent statutory body that litigates employment related complaints, including issues that were the responsibility of the former Equality Tribunal.

by Community Centres, the government tried to give priority to applicants with a Roma background by including knowledge of the Romani language as a criterion in the requirements for the position. In some cases, non-Roma applicants falsely declared that they knew the Romani language and were recruited as mediators. In response to complaints from stakeholders and the Association of Greek Roma Mediators, the government took action to avert this problem. Following a recommendation made by the Special Secretariat for Roma Inclusion, the government introduced a by-law to regulate the "Process of Proof of Knowledge of the Romani Language or Local Dialect".

The *Deutscher Gewerkschaftsbund* (German Trade Union Association, DGB) runs the project *"Faire Mobilität"* which is funded by the Federal Ministry for Labour and Social Affairs and the Federal Ministry for Economic Affairs and Energy. The project aims at achieving fair salaries and working conditions for migrant/mobile workers, especially those from CEE. It provides advice in five languages to migrant/mobile workers on their employee's rights, on how to deal with employers who do not pay them and on how to file a case to the court. It acts as well as an advocacy actor identifying problems of migrant/mobile workers, informing the public on the problems faced by foreign worker, drawing up recommendations for policy making and developing and disseminating information material. One of the main target groups are Romani workers from Bulgaria and Romania.

HOUSING AND ESSENTIAL PUBLIC SERVICES

Data on living conditions and access to basic amenities

In most Member States, a large share of housing inhabited by Roma is of lower quality compared to the general population; at the same time, it is also concentrated in neighbourhoods with more environmental problems. According to the recent EU-MIDIS II survey conducted in 2016, there has been an improvement in the quality of basic amenities, but the overall gap between the housing situation of the general population and the Roma population still seems to be inadequately addressed in most countries.[7] The survey furthermore demonstrates the gap in the housing conditions in nine selected Member States: Bulgaria, Croatia, Czech Republic, Greece, Hungary, Portugal, Romania, Slovakia and Spain (but countries with smaller Roma population have not been included in the FRA EU-MIDIS II survey). Beyond EU-MIDIS II, several local data and national data collections, and earlier UNDP/World Bank/EC surveys, reveal data on the living situations of Roma in a more or less systemic way. Although the international comparability of the data is limited, still, within-country comparisons between the living situation of Roma and non-Roma are generally available.

A major housing indicator for overcrowding emphasizes that, on average, Roma families have considerably smaller living space per person. In Bulgaria, Czech Republic, Hungary, Romania and Slovakia, on average, the gap between Roma and the general population ranges from 30 per cent to 70 per cent in terms of available floor space and the number of rooms per person in a household, with the lowest gap being in Romania and the highest in the Czech Republic. The situation in Greece is comparable to the post-socialist countries, which may be linked with housing allocation techniques in the early 2000s: lower quality housing was allocated to Roma families so that they could leave campsites where they lived in tents and shacks. In Spain and Portugal, the general average is better compared with the rest of the selected countries, but the gap is larger.

The lack of access to running water and toilet and bathroom facilities seems to be especially problematic in former socialist countries. Particularly, Romania, Bulgaria, Hungary, Slovakia and Croatia lack indoor toilets in Roma households, whereas Greece faces similar issues. The RCM country reports document a number of additional issues: the Slovakian situation illustrates that, even though the physical infrastructure may exit, drinkable water from public pipelines may not be accessible for all inhabitants or is available only for several hours a day in some segregated neighbourhoods. Sometimes, despite having water infrastructure, a housing unit may be cut off due to outstanding debts. Hungary, Austria, Greece and Slovenia[8] report such cases, too.

Water resources used in marginalised settlements are often polluted by animals, industrial pollution or agricultural fertilisers. Pollution and environmental problems seem to be more prevalent in Roma communities: across all the countries, these problems hit Roma communities 1.5 to 6-times more than the general population, as specified by the EU MIDIS II report.

Countries beyond the ones surveyed by EU-MIDIS II report similar challenges, even though there is little exact quantitative evidence about the situation of their Roma communities and no data is available for Estonia. For example, in Austria, in general, amenities may be available for low income families but families in informal housing may face challenges. In

[7] FRA (2018). *EU MIDIS II. Second European Union Minorities and Discrimination Survey: Roma – Selected findings.* Available at: https://fra.europa.eu/sites/default/files/fra_uploads/fra-2016-eu-minorities-survey-roma-selected-findings_en.pdf

[8] In Slovenia there have been two cases before the European Court of Human Rights concerning the access of Roma to basic infrastructure, including water. One case (*Hudorovič v. Slovenia*, Application No. 24816/14) has been rejected by the court in March 2020 (see for example: Jonathan Lee, *No water, no justice for Slovenian Roma at European court*, ERRC, 12 March 2020). The other case (*Novak v. Slovenia*, Application No. 25140/14) is pending.

Cyprus, the heavily run-down formerly Turkish-Cypriot housing represents a major housing resource for Roma. A survey in Latvia conducted as part of the research "Roma in Latvia", revealed a considerable gap between Roma and non-Roma in terms of water supply and sanitary units: less than half of Roma have access to these facilities. In terms of overcrowding and poor housing conditions, Roma in Poland face housing disadvantages, too.

In post-socialist countries, the housing exclusion of Roma is further exacerbated by spatial concentration, segregation and the prevalence of illegal or informal housing and large monoethnic urban neighbourhoods or rural settlements. For example, in Bulgaria, NGOs estimated that 50 to 70 per cent of Roma live in informal housing. In Slovakia, every third Roma household was estimated to live in informal housing. In the Czech Republic, every third Roma family was estimated to be housed in a segregated setting.[9] In Romania, more than half of the neighbourhoods inhabited by Roma are monoethnic,[10] and every fifth household lacks documents.[11] In Hungary, two-thirds of Roma live in neighbourhoods with predominantly Roma inhabitants. The Czech system of very expensive "social hostels" for homeless Roma households, who cannot find standard accommodation because of widespread discrimination, represents a special case of segregated housing. Another spectacular example of systemic residential segregation is the accommodation of Roma families in "nomad camps" practised by many Italian municipalities, rather than promoting their access to regular housing. Roma who have lived in informal housing, or in settlements that have existed for decades, some which were created by the central or local government, face a perpetual eviction threat.

As for the informal housing of foreign (intra EU-mobile or third country nationals) Roma in the EU's "old" Member States, makeshift settlements or temporary formal settlements are some of the examples for extremely poor housing conditions. The Italian RCM report discusses the dramatic housing conditions due to several aspects: poor state of the building (e.g. ruined or slum housing), lack of access to drinking water and sanitation in both public and private housing). At times, access to garbage collection, which should be provided as a public service, is not provided, access to electricity is insecure, use of heating is restricted by households and there is overcrowding. Germany reported similar problems regarding the housing situation in improvised settlements, such as the temporary informal settlements of Roma and non-Roma immigrants in parks and on brownfields that have developed in recent years in many German cities. Equally problematic are the numerous cases of illegal leasing practices that exploit the precarious situation of Roma and non-Roma from Bulgaria and Romania, involving per-capita or per-bed leasing, unlawful rent increases and eviction threats.

In countries with non-sedentary communities, access to permanent halting sites or halting sites with adequate services creates a further gap in accessing accommodation of adequate quality. The provision of sites, both for temporary and residential stay, as well as the access to basic amenities in already-existing halting sites in the UK, Ireland or in Belgium, appears highly insufficient in many regards. The French *Gens du Voyage* experience similar challenges: private or public providers fail to service halting sites adequately in terms of water and electricity supply or garbage collection. In the UK, the lack of culturally appropriate and adequate halting sites was reported. While the general housing conditions

[9] Source: https://fra.europa.eu/sites/default/files/fra_uploads/1481-roma-housing-conference-SSvoboda-ppt.pdf

[10] Szomogyi, E., Teller, N. (2011) *Improving housing conditions for marginalized communities, including Roma in Bulgaria, Czech Republic, Hungary, Romania and Slovakia through the absorption of ERDF*. Budapest, Metropolitan Research Institute. Available at: https://www.opensocietyfoundations.org/sites/default/files/housing-vademecum-supplementary.pdf

[11] Duminică, G., Ivasuic, A. (2013) *Romii din România. De la țap ispășitor la motor de dezvoltare*. Bucharest, Agenția Împreună. Available at: http://agentiaimpreuna.ro/wordpress/wp-content/uploads/2014/08/Romii-din-Romania.-De-la-tap-ispasitor-la-motor-de-dezvoltare.pdf

of sedentary Roma have improved, Traveller communities seem to have become even more marginalised in all of the relevant countries.

Access to secure and affordable housing

In many countries, public housing policies have been specifically developed to address the housing needs of poor households, and also those of poor Roma communities. The RCM reports claim that some of these policies are aimed at facilitating access to housing, that is, offering social housing for the neediest ones and making sure that rent levels are affordable for poor families. Other policies focus on building new social housing for disadvantaged groups, providing affordable construction sites or help municipalities and NGOs create or develop funding programmes for rental housing etc. Also, some countries apply rules for new investments, through which low-income families can move into integrated – or mixed – neighbourhoods. However, the implementation of such policies is slow, small scale, and thus, their effects remain rather weak (e.g. the still planned "gradual rental programme" in Slovakia, new social housing investments into building a few dozen dwellings in Hungary and Bulgaria, or the Spanish scheme for former camp-dwellers). It is important to bear in mind that many countries have very high home-ownership rates within the general population. Therefore, the disadvantage Roma still face in terms of being overrepresented in the social housing sector – that is, if they manage to access social housing at all – points to a lack of adequate mainstream housing policies.

In Bulgaria, Czech Republic, Hungary, Romania and Slovakia, social housing represents only a small fraction of the total housing stock; within this stock, Roma and poor households are over-represented, often in segregated areas. The share of social housing represents a few percentages of the total housing stock in Slovakia, Hungary, Bulgaria and Romania (all below three per cent).[12] Even though the share of the public housing stock is larger in the Czech Republic (ca. eight per cent), the social housing stock is also a similar-sized sub-sector.[13] This development is linked with the housing privatisation and restitutions that took place in the post-1989 transition years. Back then, worse-off tenants, among whom many were poor Roma, could not purchase their dwellings, so they had no other option but to remain renters. It is also related to the social housing allocation techniques used during the later periods: in selected countries, they went hand in hand with the decline of the public rental housing and the socio-economic profile of its tenants ("residualisation"). These were sometimes linked with urban renewal strategies to keep Roma and poor households in compact buildings for an easier management of a more or less planned "renoviction"[14] (i.e. the relocation of all of a building's tenants on the grounds that a large-scale renovation is planned) of selected neighbourhoods, or to make sure that "residualisation" is enforced. Local allocation techniques may prefer to house poor Roma families in concentrated and segregated neighbourhoods, as has been reported in Slovakia through the "lower standard flats" programme; in Bulgaria in relation to recent social housing investments; in Hungary as a general pattern; and via market-based mechanisms in the Czech Republic in the case of "social hostels" for homeless Roma families.

The shortage of affordable and secure housing and concentration in monoethnic neighbourhoods are prevalent in all Member States. The shortage in the social housing stock is prevalent in Southern European countries. Allocation techniques comparable to those used in CEE with the largest Roma populations are described in Cyprus and Poland. The overrepresentation of Roma in the social housing sector due to similar reasons across CEE post-social countries is also reported in Estonia and Latvia where people are forced to choose low-maintenance costs associated with very low-quality dwellings due to affordability problems. The shrinking size of the housing sector in Germany has recently

[12] Lux, M., Sunega, M. (2014). *Public Housing in the Post-Socialist States of Central and Eastern Europe: Decline and an Open Future*. Housing Studies 29 (4): 501-519. ISSN 0267-3037.

[13] *Ibid*.

[14] Baeten, G., Listerborn, C. (2015). *Renewing urban renewal in Landskrona, Sweden: pursuing displacement through housing policies*. Geografiska Annaler: Series B, Human Geography 97 (3): 249–261.

had an impact on its potential for accessing affordable and secure housing. Accessing housing in Greece is reported to be cumbersome not only due to a lack of social housing, but also due to discrimination.

The statutory responsibilities to grant access to secure and affordable housing differ across the EU. For example, Ireland, the UK, Denmark, or France have to ensure access to housing for persons meeting specific local requirements (such as, citizenship or permanent residence, or registration for social security number). A similar duty formally exists in Italy, and the NRIS defines Roma's "liberation from camps" considered as a historic "anachronistic and emergency [policy] response". In reality however, Roma are deprived of access to standard housing and public authorities (with few exceptions, such as Emilia Romagna region) continue to systematically segregate them into monoethnic camps. None of the other Member States have obliged themselves at any level of governance to act by means of adequate housing policies to tackle the needs of selected vulnerable groups, including Roma. In Portugal and Slovakia, national-level housing strategies explicitly deal with access to social housing but there is no comprehensive evaluation available regarding the implementation of these policies. Similarly, no issues were reported regarding Roma in Finland, where no information about EU migrant Roma is available.

Local connections and deposits are strong conditions in terms of preventing poor Roma families from accessing affordable and safe rentals, including social housing rentals. In most EU countries, access to municipal housing is only possible if a certain income level, labour market criteria and having resided in the town for a certain number of years (local connection criteria) are fulfilled. For example, in Hungary, the Czech Republic, Slovakia, Romania and Bulgaria, municipalities have full freedom to decide which flats can be allocated to which applicants. Permanent residency for a specific number of years is a key criterion that prevents EU citizens migrating to another EU Member State from accessing housing in urban areas in Austria and Italy. In Italy, so-called "nomad camps" seem to be the main response to the housing needs of intra-EU mobile Roma. In Spain, where a special down-payment is required to access social housing, many families in need were hit by the 2008 economic crisis to such an extent that they could not even access the social housing they were entitled to. Sometimes, there is a mismatch between the available stock and the needs of the household in terms of size and location, as reported in the UK in relation to the few social housing waiting lists that are available. In Sweden, the automated, computer-based queuing system used by housing companies for the housing allocation may have a discriminatory effect as not all housing seekers, including Roma and elderly Roma in particular, are literate or have computer skills.

In countries with significant Traveller communities, access to adequate halting sites seems to be problematic. Even in Ireland, where the statutory rights for Travellers are stronger than in other EU countries, the legal framework is not enforced, leading to significant overrepresentation of Travellers and Roma in the homeless population. The Irish RCM country report states that government measures meant to deliver adequate accommodation to Travellers are failing. In France, the creation of new halting sites for *Gens du Voyage* has been on the policy agenda for nearly two decades. However, the chosen locations are often outside the dense urban areas, which means that investing in infrastructure in these places causes additional financial burdens. Sometimes Travellers themselves take initiatives, and if informal solutions are sometimes tolerated, then housing insecurity prevails. Although Italy has a very small nomadic Roma population estimated to make up of approximately two per cent of all Roma, no authorised halting sites are provided. As a result, these families have to settle in areas allocated to prominent circus families of Roma and Sinti origin.

Some promising local initiatives demonstrate effective interventions. Isolated cases represent inspiring examples for local authorities and other partners. For example, the housing access strategy implemented by the city of Dortmund carries out housing brokerage in cooperation with landlords. Based on Dortmund's database of "problematic houses", these measures primarily aim at protecting tenants and have managed to improve the situation in many problematic buildings. At the same time, this may be a double-edged sword, which serves as a justification for carrying out "checks" on – and sometimes against

– residents, eventually leading to evictions. Social rental agencies in the Netherlands and Belgium fulfil a similar brokerage role for vulnerable tenants.

Inclusivity and effectiveness of housing benefits and social assistance

Cuts made in recent years to housing benefits and social assistance have generally affected housing affordability for poorer households across the EU. In many countries, housing benefits and social assistance, which are meant to help people pay their housing bills and make sure that they can live in adequate housing, are often not available for every poor household, including disadvantaged Roma families. At the same time, in several countries, some protection against eviction is provided at least temporarily (e.g. Greece and Hungary), or systematically (e.g. Germany)[15] with a strong focus on prevention in the form of cooperation with social services and/or provision of legal aid (e.g. the UK, Germany) to prevent families from becoming homeless. In Spain, besides infrastructure and housing development subsidies, debt management schemes have been launched to prevent evictions.

Benefits systems are often decentralised. Consequently, regional and local disparities in coverage may affect different households differently, depending on where they are located. For example, in Hungary, housing benefits are optional and such amounts are very low compared to the actual housing costs. The same problem (the housing benefits amounts not reflecting the real housing-related costs) exists in Bulgaria and Slovakia, or in Romania, where they cover a marginal part of the heating costs. In Czech Republic, housing benefits reflect real housing-related costs and ensure that poor households spend no more than a certain portion of their income on housing and that, for the poorest families, they will still have a minimum amount of disposable income left after covering their housing costs. This more generous system is reported to be misused by owners of run-down, segregated lodging that is provided for socially excluded Roma families, especially in the case of the highly problematic "social hostels". Another development of great concern in the Czech Republic is the option available for municipalities to declare "benefit-free zones", where new tenants are not eligible for housing benefits. Ultimately, this means that tenants depending on housing benefits are pushed out of urban areas to the margins of the society. The corresponding regulation has been challenged by the constitutional court, but no decision was available at the time of writing this synthesis report.

As for non-sedentary and Traveller communities, accessing housing benefits remains a challenge. In France, people living in a caravan are not eligible for housing benefits, except if a caravan is parked for a limited period of time in a hosting area and if tenants pay a fee to the entities managing these sites. More importantly, project-based relocation benefits, which may reduce the rent considerably, are crucial for transitioning from squatting to regular, paid accommodation. In the UK, the housing benefits system for Travellers is linked to the ownership of the halting sites; this traps Travellers in sites owned by local authorities.

Intra-EU mobile citizens may be at a disadvantage when applying for housing benefits across the EU due to eligibility criteria. For example, the access of non-German Roma to housing benefits is generally worse compared with that of German Sinti and Roma. Since late 2016, citizens of Romania, Bulgaria and Slovakia who are not officially employed have been excluded from several types of assistance. This affects their eligibility for social assistance received by those who have no job and are not able to cover for basic essential living expenses (so-called "ALG II"), in particular, a comprehensive minimum income, which includes covering real housing costs. On a more positive note, *Wohngeld*, the mainstream form of rent supplement, has not been restricted based on residence status or nationality.

[15] Kenna, P., Benjaminsen, L., Busch-Geertsema, V. and Nasarre-Aznar, S. (2016). *Pilot project - Promoting protection of the right to housing - Homelessness prevention in the context of evictions. Final Report.* European Union, p. 175. Available at: https://op.europa.eu/en/publication-detail/-/publication/0c16776d-1e4e-11e6-ba9a-01aa75ed71a1/language-en

Additional barriers, such as the lack of identity documents, illiteracy and lack of information, may also prevent Roma families from accessing housing benefits. Applying for housing benefits is associated with a lot of administrative burdens. As specifically reported in the case of Greece, in practice, this aspect is very difficult to manage for (semi-)illiterate and marginalised Roma living in informal dwellings. Language barriers across Scandinavia and in the old Member States may have a similar effect on accessing benefits, especially for EU mobile citizens. The lack of a registered local address, for example, due to a missing housing title or ID cards, may lead to exclusion from housing allowance schemes in Romania, Slovakia and Bulgaria.

Tackling discrimination and segregation in housing

In some Member States, governments have made efforts to understand the scale of housing segregation. In Czech Republic, Hungary, Romania and Slovakia, there have been comprehensive initiatives to map marginalised communities. These have either used quantitative data, as in the case of Hungary's "segregation map" based on census data, a combination of the census and other household surveys in Romania's (such as "SocioRoMap"), or qualitative field research, as in case of the Czech Republic's list of "socially excluded localities" and Slovakia's "Atlas of Roma communities". Although there is no comprehensive quantitative data due to underreporting, it has been noted across all Member States that Roma generally have limited access to housing in non-Roma neighbourhoods due to discrimination and prejudice.

In most countries with the highest number of Roma, the momentum for change has yet to come. Despite considerable funding flowing from the ESF and ERDF into marginalised neighbourhoods, dismantling housing segregation is a goal still to be attained in Bulgaria, Hungary, Romania and Slovakia. Interventions ensuring that Roma families do not have to move to segregated areas or spatial integration pilot projects remain marginal, mainly because of the lack of political will on both national and local levels. Noteworthily, in the Czech Republic, national conditions for ERDF investments into social housing include some anti-segregation provisions.

Segregation practices also prevail in Italy and Portugal, even in the most recent relocation processes that are based on new constructions. Indirect measures may also foster segregation if the housing market is spatially segmented. For example, in Finland, cuts in housing allowances have increased the need to replace larger dwellings with smaller and cheaper housing. Coupled with the location of cheaper housing units, the Finnish RCM report warns that this may push some Roma families into poverty-stricken neighbourhoods in the future. In Spain, the Roma community continues to live in stigmatised neighbourhoods or in ghettos despite an innovative housing strategy being applied in selected locations in Madrid and elsewhere.

Governmental initiatives focus more on legalising informal settlements rather than on active desegregation. Several CEE countries have piloted legalisation interventions: in Slovakia, the mid-2000s saw the first attempts to incentivise municipalities to look after regulating land titles. According to the 2013 "Atlas of Roma Communities", approximately two-thirds of land parcels in Roma settlements are either legalised or can be easily legalised (thanks to clear and/or public ownership of the land). In order to boost the process, the procedure has been further simplified as of 2017 and the legalisation process received support from the ESIF. In Bulgaria, waves of formalisation and legalisation were launched approximately 15 years ago; however, local authorities have been taking hardly any action to legalise houses in Roma neighbourhoods, although some of these do already meet the official requirements. Simultaneously, even basic possibilities offered by the legislation remain unused by members of the Roma community due to the lack of knowledge of the complex procedures, legal culture and unpreparedness of many administrations to work with the Roma community. In Hungary, there have been very few local programmes linked to investment projects: those that are in place mostly focus on making funds available for renovating dilapidated housing. In Romania, a small ROMACT project pilots updating and legalising housing titles in a selected neighbourhood. Moreover, the ESIF has been planned for the legalisation of housing in Roma communities, but information on the achievement

of such actions is not available at the moment. According to the French RCM report, regularising informal caravan sites on agricultural land has been a fiasco. On the other hand, in Croatia, legalisation is reported to have tangible impacts.

Squatting, including temporary and informal encampments with sanitary problems, is usually sanctioned by eviction across Europe.

Main tools for improvement of housing conditions

Housing projects that have been implemented by NGOs or municipalities tend to differ from one another, to be sporadic, of diverse scale and not based on national guidelines. Additionally, they are often meant to deal with particular situations or emergencies only. In some Member States, governments, local municipalities and NGOs have launched initiatives aimed at renovating dilapidated housing for poor Roma and non-Roma families irrespective of their location.

Although some interventions may improve the actual physical housing conditions, they may also reinforce spatial and social distance, and thus hinder the inclusion of Roma. Examples of such interventions include Slovakia's "lower standard housing" with heavy co-funding (up to 75 per cent) from the state budget, implemented by municipalities, which systematically build new social housing for Roma in segregated areas only; or Cyprus's small-scale new prefabricated housing programme, providing housing in segregated areas built to improve the conditions of those living there.

Systemic long-term interventions in the housing sector in selected countries show that state-level policies are essential for a sustainable framework. In the UK, some local authorities are making efforts to rectify the situation and upgrade sites. They have taken these steps because many of the caravan sites were located on unsuitable land, such as landfill, on contaminated land or close to a railway line. Many municipalities in the UK have introduced "selective licensing" to oblige all registered residential landlords to let properties according to a number of minimum standards, as well as to enforce tenancy agreements. This may improve the housing conditions of Roma in the private rental sector.

In Greece, a new strategic approach has been fostered by the state, introducing new regulations. The aims of these measures are multiple: to relocate people from camps and settlements, improve infrastructure, create a self-management system protecting the residential complexes, and to offer rent subsidies for finding a home in the integrated parts of the cities. Moreover, a Roma mentoring network is being set up to address issues regarding the access to benefits and programmes.

Another recently launched example is provided by Poland. There, many local authorities have turned to the Roma Programme, effectively using funding offered for interventions, including for the purchase and construction of residential premises, reparation and construction of lighting, sewage and waste-water treatment plants, construction of playgrounds, etc. Nearly a quarter (24 per cent) of the Roma Programme's budget is spent on improving housing conditions. In the Netherlands, several major cities have developed strategies to promote the inclusion of migrants, among them Roma. In Lithuania, a set of measures are implemented by the government through the NRIS and the Vilnius city municipality facilitate the relocation of families to integrated areas with social housing or rent allowance was launched.

Selected countries have piloted various combinations of interventions, including an integrated approach, within a diversity of institutional settings and cooperation mechanisms. Lessons have been learned about phasing, participatory planning, balancing interests and challenges related to sustainability. However, the scale of interventions and political engagement remains low compared to the challenges.

IMPACT OF HEALTH CARE POLICIES ON ROMA

Equal access to public health care services

All Member States made emergency healthcare services available to everyone, except for Slovakia, where an extra fee is charged to dissuade patients from frivolous use: an arrangement that disproportionately hurts Roma. Otherwise, access to general healthcare services – occasionally under different tiers of financing – is, in many European countries, conditional on being covered by health insurance. Excluded communities like the Roma are often among those who are left out of health insurance coverage. According to the RCM country reports, this is mainly because of issues, such as affordability, i.e. the inability of some Roma to pay the required contribution (e.g. in Bulgaria, Romania); limited know-how with respect to navigating the health bureaucracy (reported in Bulgaria, France, Estonia or Italy); lack of "habitual residency" (specifically in Ireland); language barriers (reported in Austria, Denmark or Germany); less conventional work history (in Bulgaria, Germany or Italy); or unconventional immigration status (reported in Belgium, Denmark, France, Germany, Italy or the Netherlands).

Roma living in Bulgaria, Romania, Greece and Italy are the most likely to lack health insurance coverage. In Romania, in certain Roma communities, the proportion of uninsured persons can reach as high as 46 per cent. A research initiative in Italy found that 94 per cent of the patients that were visited and assisted in the informal settlements of the city of Milan did not have health insurance coverage. In such countries, extension of free health insurance coverage to more members from vulnerable social groups could be one of the best ways to address health inequalities vis-à-vis the Roma. Greece is an example of legislating change in order to address problems experienced by those Roma who are not legally covered by the health insurance system of the country they reside in when accessing healthcare. In 2016, the right to free access to all public health structures for the provision of nursing and free healthcare services was granted to uninsured and vulnerable social groups.

Even if Roma are covered by insurance, low-income individuals may struggle with paying the additional out-of-pocket costs of healthcare services. They range from co-payment for some healthcare services, such as visiting the general practitioner (Austria and the Czech Republic), the price of medicines (Czech Republic), to the costs of travelling to the nearest town where the doctor is located (Czech Republic, Croatia, Greece, Hungary, Italy, Romania, Slovakia) or even to the wide-spread and expected gratuity payments to doctors and nurses (Hungary). Targeted relief efforts, led by NGOs, making hard-to-access or expensive services available to indigent members of the Roma community free of charge can mitigate this challenge to some extent. Nonetheless, systemic improvement can only be expected by means of legislative and fiscal changes.

An additional, albeit important factor, is that the actual physical accessibility of healthcare services is often dependent on local capacity and geography. Access to healthcare can hardly be equal in the following situations: if there is no one to vaccinate Roma children, if hundreds of positions (such as primary physicians and health visitors) are unfilled, if hospital capacity is disproportionately lacking in geographical areas inhabited by sizeable Roma communities (Cyprus, Greece, Bulgaria, Hungary or Slovakia), if it takes longer for healthcare service providers to reach Roma settlements or ghettoes than other villages (Croatia, Italy, Romania, Slovakia), or if the waiting times in overcrowded hospitals are too long (Greece and Hungary).

Even though political will may exist, this set of challenges is especially hard to solve. To do so requires an administratively complicated and fiscally or politically costly expansion or adaptation of the mainstream institutional healthcare provision system. However, the setting up of new outpatient service locations in poor, previously underserved Hungarian micro-regions in 2010-2012 is a good example of extending coverage for the benefit of disadvantaged rural populations, among whom the Roma are overrepresented. This

measure, which proved to increase the number of patients seeing a doctor,[16] was implemented with the help of EU structural funds.

The geographical concentration of Roma communities in somewhat underserved regions may also present an opportunity for targeted treatment. That is the case in the *Malopolska* and *Śląsk* regions of Poland where many deprived communities live. There, special funds are earmarked for prevention, including examination or check-ups and immunisation efforts. The initiative was implemented by ten local governments and 11 non-governmental organisations, including eight Roma organisations. Measures included rehabilitation stays for seniors, periodic examinations; the so-called "white days", providing free access to specialists, examination and vaccinations; examining children and youth in the areas of ophthalmology, laryngology, and dentistry; meetings and preventive examinations in the fields of gynaecology, prenatal care, and vaccinations for infants and children. Despite their benefits, these measures should not be seen as a substitute for the general local availability of reliable healthcare services. Another relatively low-cost, albeit insufficient way to mitigate inequality in geographical access, put into practice with PHARE support in Bulgaria from 2006 onwards, is establishing and dispatching mobile healthcare units.

Access to health-related information is often much less available to Roma than to the majority. Even when such health information is made available, members of the Roma community might be less inclined to trust and believe healthcare workers, often for a good reason, than patients who have never been discriminated against. An egregious instance of information denial is a practice in Bulgaria. There, in order to relieve excess demand, hospitals sometimes did not inform uninsured patients about the special health insurance coverage available for the indigent. Another example is private health insurance providers flogging inappropriate insurance plans upon Roma clients for small cash payments in Slovakia.

Equal access is highly relevant in most countries, but especially in Bulgaria, Hungary, Romania and Slovakia. In general, it can be addressed by making time and resources available to public health orientation and education. In a more targeted way, the solution lies in bridging socio-cultural or linguistic barriers in the case of foreign Roma (intra EU-mobile or third-country nationals). For the latter, Denmark provides an instructive example: all residents with a right to free treatment have the right to interpretation when a doctor finds that interpretation is necessary. In 2017, however, with the primary aim of ratcheting up foreigners' incentives to learn Danish, new rules were enacted and patients who need interpretation and who have lived in Denmark for more than three years are charged a fee. The new rule has had adverse side effects: for example, explaining symptoms is hard enough in one's mother tongue, so non-Danish-speaking Roma patients who could not afford translation may end up miscommunicating with healthcare providers; or family members (even children) may have to step in to translate sensitive health-related content at a great emotional cost.

The importance of trust in service providers is illustrated further by the notion that in order to address serious health issues, many Cypriot Roma claim to prefer hospitals and clinics in the occupied areas in the Northern part of the country due to the lack of trust and communication with doctors and staff in the South who do not speak their language (Turkish or closer to Turkish than to Greek).

Main tools for addressing Roma's exclusion from healthcare

According to the RCM country reports, the majority of measures addressing this policy area are secondary in nature: they partially plug holes instead of making sure they are not there in the first place.

[16] Elek, P., Váradi, B., and Varga, M. (2015). *Effects of Geographical Accessibility on the Use of Outpatient Care Services: Quasi-Experimental Evidence from Panel Count Data*. Health Economics, 24: 1131-1146. doi:10.1002/hec.3201.

In France, the National Centre for Health Insurance established a special centre for economically inactive EU citizens residing in France. The city of Nîmes centralised all applications from EU citizens with no professional activity who reside in France instead of having this job done by local centres in each department. According to the French RCM report, this has resulted in longer delays. The German RCM report identified as an example of good practice (yet, a temporary one) the pilot programme of "clearing centres" (operating in North Rhine-Westphalia and Hamburg) through which people without health insurance or with an unclear insurance status can access the healthcare system. In the Netherlands, local healthcare-related projects, managed by the Ministry of Healthcare, Welfare and Sports, are made possible via the "reparation money" (*Rechtsherstelgelden)* financial support to Roma NGOs. The universal "health visitor" (*védőnő*) system in Hungary provides care for all expectant mothers and supports children from birth until they start primary school (this is one of the instances in which the intervention is not secondary in nature).[17] In the Czech Republic, the governmental Agency for Social Inclusion (ASZ) conducts health literacy research in socially excluded localities. In cooperation with the National Institute for Public Health, they have created a methodology for the position of health promotion mediator. ASZ is also preparing documentation for introducing compulsory education on intercultural and inter-social communication for the medical profession in collaboration with the Institute for Health Information and Statistics. ASZ has helped municipalities design projects on the prevention of gambling and substances addiction.

An example of good practice that could be rolled out in other countries is the training and employment of Roma health mediators, who can inform and build trust (Greece, Italy, Bulgaria, Romania or Slovakia). Indeed, in Slovakia, in a promising combination of governmental and non-governmental efforts, a large NGO-run Roma health assistance pilot programme was developed and implemented by the governmental agency "Healthy Regions" (*Zdravé regióny*) established for this specific purpose by the Ministry of Health (the programme has been funded by ESF since then).This programme largely employs more than 270 health assistants coming from marginalised Roma communities in 250 settlements and seven hospitals, and engages in participatory research on Roma's health needs covering 500 marginalised communities. In Romania, a health mediator project was successful in 45 vulnerable Roma communities. It was funded by the EEA/Norway Grants and the Roma NGO "*Centrul Romilor pentru Politici de Sănătate" and Sastipen* were project partners. The presence of intercultural mediators contributes to facilitating dialogue with patients, prevents conflicts, and assists patients with key information. Nevertheless, the Belgian RCM country report draws attention to the importance and necessity of hiring mediators who are of Roma origin in order to optimize the effects of health mediation initiatives.

Other arrangements such as Greece's Roma Departments, which operate as part of Community Centres in municipalities where Roma live, can also prove to be useful in providing public healthcare information to Roma.

Data on the state of the health of Roma

In the field of healthcare, EU-level policymaking has a limited direct impact. Despite EU's support to research and funding of specific projects, healthcare policies that can improve the health of the Roma are set and implemented by the Member States. That is why setting the right health policy goals, allocating the necessary resources and implementing those policies in the NRISs, as well as in nation-wide health policy strategies is of crucial importance. For these to be successful, it is also imperative that representatives of the Roma community have a voice in the design and monitoring of Roma-specific health policy measures. Where applicable, they should be also involved in the implementation process – government's cooperation with the *Equis Sastipen* network in Spain might be a good example – while Polish local Roma NGOs report to have been mostly left out of the loop.

[17] http://www.euro.who.int/__data/assets/pdf_file/0008/80783/E84926.pdf p. 61

Member States' specificity of the policy area is further strengthened by the fact that the quality, entitlements, institutions of public health, health insurance, healthcare financing, as well as healthcare provision and the proportion of public and private elements in the healthcare system differ greatly from country to country. Those differences, in turn, affect the nature of the challenges Roma face. While policy priorities matter a great deal, comparative amounts earmarked for healthcare in national budgets are also dependent on the level of economic development of the respective country: even in Lithuania, Poland, Hungary or Greece, the fiscal expenditure on healthcare per capita in US dollars is less than a third of what the German or the Swedish state spend on the health of their citizens.[18] The majority of the EU's Roma citizens live in SEE and CEE Member States where government healthcare spending is below the European median even as a percentage of GDP, let alone in monetary terms.[19] Thus, fiscal constraints on expanding or improving healthcare to benefit the Roma community may be more onerous in these countries than in Western and Northern European countries.

Challenges are different across different sets of Member States operating different health policy institutions. As described in more detail below, in countries with non-universal coverage, partially contribution-based health insurance systems or high out-of-pocket drug costs, affordability of healthcare services will be a key challenge. Conversely, in countries with *de jure* universal or close to universal coverage, awareness, availability and waiting times might be more likely to be the bottleneck in terms of Roma patients accessing the necessary healthcare services in time.

An important general observation that emerged is that in certain Member States, such as Bulgaria, Czech Republic, Croatia, Germany, Hungary and Ireland, there is no administrative health data collection disaggregated by ethnicity available for policy analysis. While gathering such sensitive data is fraught with privacy challenges, without it those who want to describe, analyse and highlight the specific dimensions of the health gap between the Roma and the majority population to advocate for action are forced to use less reliable census or questionnaire-based information on subjective health variables, or even anecdotal evidence. Such information is usually a crucial element in evidence-informed health policy design in countries where it is available. An example is provided by the United Kingdom,[20] where legislation not only allows the collection of ethnic data, but also makes it a legal requirement (yet not a legal duty). Moreover, this requirement does not guarantee that "Gypsy/Roma/Traveller" category is always included in the ethnic monitoring along with safeguards to protect the privacy of individuals. In countries where administrative data on the ethnic health gap is not collected, less direct and less objective data-gathering methods can still be used and put to good use. Such good examples include a paper on "Frequent Mental Distress in Irish Travellers"[21] or the "Roosa" wellbeing study in Finland.

All concerns related to Roma health cannot be followed through in this report. As mentioned above, reliable administrative data is not available in several countries. However, there are indubitably specific health areas in which Roma are performing much worse than the majority. The conditions listed below often have a disproportionate effect on vulnerable

[18] 2017 or most recent data available at: https://data.oecd.org/healthres/health-spending.htm

[19] Own calculations based on Eurostat data available at: https://ec.europa.eu/eurostat/statistics-explained/index.php/Government_expenditure_on_health

[20] However, there is room for improvement as well. Cf. Peter J. Aspinall (2014). *Hidden Needs/Identifying Key Vulnerable Groups in Data Collections: Vulnerable Migrants, Gypsies and Travellers, Homeless People, and Sex Workers*. Centre for Health Services Studies, University of Kent. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/287805/vulnerable_groups_data_collections.pdf

[21] McGorrian C., Hamid N. A., Fitzpatrick P., Daly L., Malone K. M., Kelleher C. (2013). *Frequent mental distress (FMD) in Irish Travellers: discrimination and bereavement negatively influence mental health in the All Ireland Traveller Health Study*. Transcult Psychiatry. 2013 Aug; 50(4):559-78. Available at: https://www.researchgate.net/publication/256612079_Frequent_mental_distress_FMD_in_Irish_Travellers_Discrimination_and_bereavement_negatively_influence_mental_health_in_the_All_Ireland_Traveller_Health_Study

subgroups in Roma communities, especially children, youth, women and the elderly. According to the RCM country reports, the problematic areas include: low rates of child vaccination (Greece, Romania, Slovakia, UK); the presence of viral infections like HIV-AIDS or Hepatitis (Bulgaria, Latvia, Italy, Slovakia); perinatal and women's health issues (Czech Republic, Bulgaria, France, Germany, Hungary, Ireland, Portugal, Romania, Slovakia, Slovenia, Spain, UK); cardiovascular diseases (Germany, Hungary, Romania, Slovakia, UK); respiratory diseases (Germany, Italy, Romania, Slovakia, UK); mental health issues, including high suicide rates (Ireland, Italy, UK); diabetes, obesity and nutritional deficiencies (Germany, Greece, Romania, Portugal); smoking, alcohol and drug abuse (Czech Republic, Bulgaria, Greece, Italy, Latvia, Hungary, Romania, Slovakia, Slovenia, UK); and bad dental health (Croatia, Germany, Greece, Lithuania, Sweden). Targeted policy interventions, both preventive and curative, addressing these problems in the respective Roma communities should be a priority.

On a more positive note, there are several important instances of international and cross-Member State activism in the area of Roma health. Some examples include the work of UNICEF and *Médicins du Monde* in Belgium, Bulgaria and France, or the Open Society Institute in Bulgaria.

Tackling discrimination and antigypsyism in healthcare

In addition to the systemic health inequalities and indirect discrimination addressed above, in several Member States, members of the Roma population also face direct discrimination by the health bureaucracy and state and private healthcare providers. This takes some of the following forms (the list is not exhaustive): condescending or aggressive communication or even abuse by staff (Czech Republic and Slovakia); banning family visits to hospitals (Netherlands); segregated maternity and paediatric wards (Bulgaria, Czech Republic, Romania or Slovakia); requiring proof of address from Travellers as a made-up pre-condition for registering with a general practitioner (UK); charging intra-EU mobile Roma for services even though the patient is entitled to free healthcare (Germany); outright denial of health services (Czech Republic, Italy). An extreme version of denial of service was reported in the Czech Republic. There, cases of "less willingness" by ambulance staff to serve "bad" addresses (i.e. socially excluded Roma areas) have been registered, alleging "bad experiences" and claiming to suspect that patients just call the ambulance to avoid the fee they would otherwise have to pay at walk-ins. Fearing for their health, patients often do not raise their voice when encountering such instances of antigypsyism in healthcare. While in most Member States dedicated anti-discrimination or health rights complaint mechanisms are in place and courts are there to sue if a complaint is made, the case history in certain countries (Slovakia, UK) is not readily available when requesting specific data on antigypsyism. Where complaints can be analysed, rights violations affecting Roma seem to remain persistent (Hungary).

Several high-profile cases, such as involuntary sterilisation of Roma women in Slovakia, which is now prevented by national legislation, have reached the European Court of Human Rights. That, in turn, has had an effect on the domestic policy agenda.

The Hungarian and Romanian RCM country reports have suggested sensitisation and the inclusion of adequate intercultural communication and anti-discrimination training modules in the education of health professionals as being helpful. This has been done for example in Spain with the involvement of the *Equis Sastipen* network, or in the UK where the Roma Support Group has conducted training for the National Health Service staff. However, such initiatives are useful as long as they are not tokenistic measures as in the case of the Czech Republic. There, the issue of communication is given two hours in the mandatory training schedule of Czech physicians. An additional measure that could help improve the situation includes well-financed, conscious, targeted efforts to recruit, train and employ more health professionals of Roma origin. In certain countries, there are promising efforts of this kind already in place, such as the Roma paramedic programme in Bulgaria. Or, the Traveller Primary Healthcare Projects in Ireland that have demonstrated to be an effective approach in bridging the gap between a community experiencing high health inequalities and a health service unable to reach and engage that community effectively in health service provision.

EDUCATION

Educational data availability

Access to educational data disaggregated by Roma ethnicity plays an important role in the ability of RCM reports to evaluate trends and independently analyse the results of Member States' Roma inclusion strategies and the related educational policies and programmes. While some Members States national statistics have the necessary abilities to collect quantitative data, there is a lack of information to contextualise them to understand the mechanism, causes, and improve policies and programmes to address some of the educational challenges Roma individuals and communities face. NGOs complement national statistics by conducting data collection and research through focus groups, interviews, and qualitative surveying, providing quality information rooted in community and stakeholder experiences and knowledge.

Information on antigypsyism in the education system seldom comes from public authorities and is mostly relying on NGOs and international organisations such as FRA. Roma's segregation and overrepresentation in special schools are monitored and reported by few Members States only, such as Czech Republic, Slovakia, and United Kingdom.

The educational levels with the lowest data availability that are disaggregated by Roma ethnicity are the ECEC and higher education. The bulk of the information comes from NGOs or experts conducting their own data collection. However, Ireland and the UK are two Member States that collect ethnicity data in higher education to support the access and success of disadvantaged and under-represented students.

Several Member States do tend to provide access to their project information. Most of the information that is public or available on request references the design, purpose, and targets of specific projects. There are a few countries that conduct and publish monitoring reports of their project targeting Roma education. Croatia is a positive example as it collects administrative data, complements it with surveys and publishes reports about the results and outcomes of their NRIS efforts.

However, ethic data collection in education remains a sensitive and sometimes problematic issue. For instance, Italy and Latvia administer questionnaires in schools to gather information on the number of Roma students enrolled in each grade and their performance results. The Italian report states that teachers are responsible for identifying students of Sinti or Roma origin. Teachers' bias and lack of understanding of ethnicity mean that they will identify Sinti and Roma students through indicators of poverty or if they live in camps, thus, excluding all Sinti and Roma who do not match the bias criteria. This can lead to misclassifications and misrepresentation of Roma communities in the education systems.

Access to quality early childhood education

Several Member States implement Roma targeted actions in early childhood education and care (ECEC). Their NRIS have stated goals, objectives, and target indicators. However, very few or no activities ensure that such universal programmes increase the access and opportunity of Roma families and children to make use of their benefits. Poland is an exception, as the government has designed Roma targeted ECEC measures in connection with the NRIS.

Lack of pre-school facilities does not only impact children's education; in Hungary, for example, family allowance is conditioned by compliance with the compulsory attendance in kindergarten from the age of three. Failure to do so results in withdrawing the family's allowance. Additionally, the low capacity of early childhood education facilities negatively impacts the employment opportunities of parents, mothers in particular.

Across the countries, compulsory preschool regulations vary. The RCM country reports show that the school readiness of disadvantaged children who have not received any pre-school or ECEC is low when they enter primary school. This increases the likelihood of

Roma children's unjustified placement in special schools, especially when combined with other structural factors.

Of the CEE countries with more sizeable Roma communities, only Romania does not have compulsory pre-school education within the public education system. National education systems vary in the amount of compulsory preschool provisions. Several countries provide the "right" for children of a certain age to attend pre-school, although it is optional based on the family's decision. While programmes exist to support the enrolment of disadvantaged children, most of them do not sufficiently challenge financial, social, and information barriers in accessing education. As a result, disadvantaged Roma and other groups do not have equal opportunity in accessing quality ECEC.

Throughout all the countries, a common issue is that early childhood education systems are forced to meet the demands of enrolling children. Member States lack physical infrastructure and places, as well as trained early childhood educators to provide compulsory education. According to the Romanian government, the delay in providing compulsory education is the result of not having the necessary number of institutions and budget to provide early childhood education to all children.

Disadvantaged Roma children (alongside with other vulnerable groups) are most impacted by ECEC institutions' lack of capacity due to the fact that the scarcity of schools is typically present in localities with a high share of Roma. Even in countries where kindergarten or pre-school is compulsory and free, Roma children have difficulties in accessing it because of the physical distance to the nearest school or the school's refusal to enrol them due to discriminatory attitudes. In Germany and France, despite being entitled to ECEC, Roma children were refused entry into kindergartens. The RCM reports from these two countries link such incidents to anti-Roma prejudice.

Programmes that eliminate all fees or reduce fees depending on the level of the family's disadvantage are present in all countries. However, financial barriers are the greatest and most recurrent challenges stated in the RCM reports to accessing early childhood education. Even in countries where no tuition fees for early childhood education from the age of three are requested, financial support for meals, transportation, and other costs is inconsistent. Overall financial barriers relate to certain income thresholds that must be met in order for reduced tuition to be awarded and non-tuition costs being too high. In Greece or the UK, reduced fees are linked to parents being unemployed. This leads to many disadvantaged Roma families not enrolling their children in school since they cannot cover the non-tuition costs due to low income employment, and thus not being eligible for reduced fees. Additionally, in these countries, priority is given to parents that work, thus producing a cumulative exclusion of Roma in accessing early childhood care.

The reports lack mentions of ECEC programmes involving fathers. Such programmes engage with mothers and children, and training programmes for early childhood educators do not target men. This reinforces gender roles in childcare and education.

Support in education until the end of compulsory school age

Enrolment and performance of children in schools

Enrolment of Roma children in primary school has greatly improved over the last decade in many of the Member States, although there is room for further improvement to achieve the goal of full enrolment.

A typical practice to increase Roma's access to education and improve educational outcomes is the involvement of mediators at multiple education levels. Their roles vary across countries. However, the main activities consist of facilitating enrolment, as well as establishing constructive communication between families and educational institutions to increase enrolment. The role of mediators spans across the goals of increasing access, improving quality of instruction and retention in the education system. The recurrent challenges associated with implementing this initiative are in the fields of recruiting, training, and placement of an adequate number of mediators to reach all Roma communities that could benefit from this. The quality of mediators varies across the

countries and even between regions of the same country. It depends on the level of training mediators are required to attend and the availability of such training services. Furthermore, the quality and impact of mentoring rely heavily on the level of bias and cultural sensitivity the mediators possess.

RCM reports from several countries provide examples of how mediators' engagement with the purpose of increasing access and enrolment can rely on similar frameworks, despite implementing different approaches which reflect the level of inclusiveness in government agencies, as well as society. For example, Bulgaria, Italy and the UK have developed multi-institutional initiatives to increase the enrolment of Roma children. Bulgaria and the UK use institutions' data to identify which student is not enrolled in the education system. In Bulgaria, once identified, fees and criminal punishment are used to incentivise enrolment and educational persistence, while in the UK more emphasis is put on prevention rather than repression and criminalisation. In Italy, multi-agency teams build relationships with families, provide additional training and workshops. This approach provides an incentive through building the families' knowledge of institutional enrolment processes and the importance of education. The examples from these countries showcase how using multiple intuitional approaches increase enrolment rates based on different approaches: for instance, Italy focuses on inclusive education and knowledge sharing, UK on prevention and Bulgaria on criminalisation and punishment. In general, negative conditionalities demonstrate lower effectiveness than approaches based on prevention and increasing inclusiveness in schools.

Another common practice employed by Member States, as well as by the civil society to improve Roma students' educational transition, persistence, and outcomes is through scholarships, some of which include mentors or tutors. These scholarships are typically found in CEE Member States with larger Roma populations. Most of the governmental scholarships are not especially targeting the Roma population; alternatively, they are targeted as socially and economically disadvantaged students. Most secondary school scholarships are awarded to support vocational training or second chance programmes. Some critics have argued that, while assisting with the completion of secondary education, schools in which students supported by these scholarships study are of low quality, do not provide students with the ability to move on to higher education, and overall lack training opportunities in competitive and rewarding careers.

In several countries, after-school programmes and extra-curricular activities are provided by NGOs, churches or by the state to support Roma children to do homework, learn languages, computer sciences, art, sport or other activities. In Romania and Slovakia, extra-curricular afternoon programmes tend to be implemented in school buildings; in Hungary and Ireland, they are delivered in NGO-managed facilities.

According to the RCM country reports, Member States' NRISs and the associated initiatives do not put a strong emphasis on teachers' knowledge and skills in the area of inclusive, multicultural and non-discriminatory education. Across all Member States, despite the fact that th education system would benefit from teachers obtaining additional training in these areas, in reality there are only few incentives, including financial ones (e.g. salary increase), for teachers to complete such training. Moreover, in many instances, teachers have the responsibility to finance additional training in these fields themselves. Upon completion, many of these training modules do not provide teachers with official diplomas or certificates that can be used to boost their professional profile and future career. Predominantly, training modules are developed and implemented by civil society organisations or independently within the curriculum of specific universities' pedagogical programmes.

Addressing early school leaving, grade repetition and dropouts

Early school leaving is impacted by each Member State's regulations on compulsory school age or grade level. The RCM country reports have stated that there is a lack of incentives for Roma students to continue their education. This is mainly due to low prospects of increased employment opportunities that are usually associated with higher levels of education. Reasons for poor employment opportunities are due to the precarious financial

situation of many Roma families, thus creating the need for Roma youth to enter the labour market at an early age and earn income to support them and their family. Discrimination within the labour market, early tracking in vocational school with poor opportunities and low career aspirations are among some of the other reasons stated by the RCM reports.

In CEE countries with relatively large Roma populations, governments have introduced dual training systems and reduced the maximum age for compulsory education, which provides increased incentives for Roma youth to decrease the amount of educational years desired and completed. Romania's compulsory schooling up to the second year of secondary education is the highest, while in the other CEE and SEE countries, compulsory schooling is defined by age or number of years in education. The main tool used by Member States to combat dropout and early school leaving is a combination of Roma mentors and scholarships for secondary school students. In CEE countries, there are scholarship programmes for students from disadvantaged families. Croatia and Poland have national secondary school programmes targeting Roma students; Romania has a secondary school scholarship programme with a Roma quota.

Grade repetition is a leading predictor of school dropout. CEE countries – Bulgaria, Czech Republic, Hungary, Romania and Slovakia – reported on problems concerning grade repetition and dropout already in the RCM first cycle report (more information can be found in the country reports and the synthesis report). The goals and objectives to reduce the dropout rates are also present in the remaining countries' NRISs. However, only a few country reports mention specific measures to tackle grade repetition and dropout.

These reports emphasise large gaps between Roma and non-Roma in compulsory school completion. Existing universal measures to tackle school dropout are not reaching Roma students and their families. Furthermore, such universal measures are not achieving the explicit NRIS goals of bridging disparities in dropout rates between Roma and non-Roma, specifically those concerning achievement of the NRIS goal regarding the decrease in dropout rates. RCM country reports indicate that early school leaving concerns around one third of Roma in Western Member States.

Roma receive little information or career guidance regarding further education that would help them take adequate and fully informed decisions. Moreover, Roma youth tend to decide on their choice of school based on what is locally available and which schools will accept them. Therefore, if the only local option is a vocational school that can provide a poor-quality job later on, Roma students will decide to leave school early. A separate section of this report discusses examples of programmes that support transition to vocational school and higher education.

There were mixed reports on the differences in dropout rates between Roma boys and girls. The dropout pull and push forces do have a gender component. For instance, teachers' expectations, negative school experiences, and social position, which reduce educational and career aspirations, lead to gendered outcomes. Male students typically enter the labour force by means of low skilled and paid work that is male dominated, while female students continue with family or household labour, or enter female dominated industries, which are also low skilled and poorly paid.

Challenges related to enrolment of children from intra-EU mobile and immigrant families

In many Western European countries, Roma coming from CEE and SEE face additional challenges in enrolling and completing compulsory education. The main issues Roma migrants encounter are learning a new language, residence requirements to exercise their right to education, lack of institutional capacity and teachers' ability to teach and work multiculturally with children from disadvantaged situations.

For example, foreign Roma coming to Austria do not know the procedure for enrolment, nor are they aware that they have the right to education even without holding permanent residence in Austria. Cases have been reported where 20-30 Roma children were unlawfully denied access due to their non-permanent residence status. In Germany, Roma face long waiting times for enrolment, at times even up to a year. Not in all *Länder* school is

compulsory for children from families with an asylum status; undocumented migrants often do not enrol their children because this would require registration at municipal authorities and due to fear of being reported to the police. Since 2013, the Swedish Education Act grants the right to education for refugee and immigrant families regardless of whether the family has a full residence permit or not. Although municipalities have the ability to interpret and implement the Educational Act, most municipalities do not provide education to intra-EU mobile families without residence permits.[22] In Denmark, access to public education for EU citizens depends on national registration as an EU worker, student, or self-employed person. If a parent is registered, they have the right for family unification and their children's education in their mother tongue.

In France, access to primary school for migrant or EU-mobile Roma children is very difficult. Main barriers are tied to documentation and "precarious living conditions". Many schools require proof of official residence, such as an invoice or rent receipt, even though regulations state there is no requirement for official proof of "domicile". The French RCM report stated that 80 per cent of migrant or EU-mobile Roma children who live in slums and squats do not attend school. These slums do not provide basic proof of domicile. Thus, families must obtain a certificate from town halls, resulting in many families not being able to obtain such a document due their low or non-existent French speaking skills, as well as for fear of being reported and deported. At the local level, many mayors deny requests to create open spaces for Roma children despite the city having a lawful duty to identify the capacity needs of the education system and grant access to every child who has the right to education.

There are a few cases of Member States implementing language courses and classes to facilitate inclusion, although the RCM reports clearly demonstrate that these efforts are not enough to ensure the full enrolment and retention of Roma migrant children. France has developed pedagogical units for the recently arrived foreign-language-speaking children, the so-called UPE2A classes, which are available for all foreign-language-speaking children. The purpose of these classes is to increase the French language learning pace and integrate foreign children in the French education system. The RCM report states that, while these classes constitute a gateway to mainstream schools, the reality is that they lead to students' exclusion, thus, stigmatisation and discrimination becomes prevalent. Roma children in Germany are often referred to welcome, transition or side-entrance classes, and as such, separated and segregated from pupils in mainstream classes. Furthermore, these children are often educated in these environments longer than it is necessary to gain German language proficiency and integrate into the education system. As a consequence, they receive lower quality education and lag behind in the learning process.

Participation in upper secondary and higher education

Promotion of general secondary education

The RCM country reports indicate that there are limited investments and programmes initiated and managed by Member States to support the enrolment and retention of Roma students in upper secondary and higher education institutions. A noteworthy practice in Romania is the affirmative enrolment policy that ensures places for Roma students in upper secondary schools. According to this policy, in each class facilities and two seats are allocated for Roma youth.

But the most common form of support in CEE countries are the state-designed, supported, and implemented scholarship programmes. A few of the state scholarship schemes provide additional mentoring and tutoring services. Croatia has the most accessible scholarship targeting Roma students, where any secondary school student who claims to be of Roma ethnicity is eligible to receive the scholarship. While this scholarship has a wide reach, it is not coupled with mentoring or tutoring, which assists in improving Roma student

[22] Neville Harris, David Ryffé, Lisa Scullion, Sara Stendahl. *Ensuring the Right to Education for Roma Children: an Anglo-Swedish Perspective*. International Journal of Law, Policy and the Family, Volume 31, Issue 2, 1 August 2017, pp 230-267.

outcomes, such as grades, attendance, retention, and graduation. The Polish "Roma Programme" is similar to the Croatian one in the sense that it provides a wide range of secondary school scholarships in conjunction with mentoring or tutoring. The Bulgarian Ministry of Education and Science and the Roma Education Fund (REF) implemented a scholarship scheme targeting Roma with a wide reach and provided mentoring and tutoring. However, in 2019, the ministry discontinued the programme (without any official explanation).

Hungary is an example of a country that provides a wide range of secondary school scholarships for students coming from socially disadvantaged families. The programme provides average students with scholarship and mentoring services, but it does not target under-performing students. Even though Hungary provides second chance programmes and training modules organised by job centres, Roma continue to struggle to achieve equity in completing post-compulsory secondary schooling. Therefore, Hungary's example demonstrates that combining different measures, such as scholarships, remedial schools, dual system education and training programmes, does not suffice to help counterbalance the negative impact of regressive policies, such as the decrease in the maximum age of compulsory education or the public work programme that discourages further education and limits employment opportunities.

As in other educational settings, Roma mediators play an important role in supporting enrolment and strengthening the presence of Roma students in secondary schools. Outside the CEE region, Roma mediators are the main source of state and NGO support for Roma students in upper secondary school. This aspect shows that Member States rely heavily on mediators to support Roma students across various stages of the educational process. While it is a positive measure, it does raise questions regarding Roma mediators' outreach, as well as their capacities and knowledge to provide useful intervention at all stages of education.

Promotion of vocational education

Programmes supporting the participation of socially disadvantaged groups and individuals in vocational education are present in many EU Member States. However, the level of support and the mechanisms of the programmes to address the complexity of the needs of socially disadvantaged groups in vocational training differ whilst programmes have diversity as an objective in their impact. Furthermore, the country reports show that Roma-targeted measures in vocational training are limited.

While attempts to improve the participation of Roma in vocational training who transition to employment is a valuable effort, the RCM country reports are apprehensive concerning how the programmes and related policies have suppressed the education and employment opportunities for Roma. In CEE Member States, the implementation of the dual vocation training model and the increased promotion of vocational training have been associated with the reduction in compulsory school age. The RCM reports note that the mechanism of vocational programmes and subsequent policies lead to an increased rate of early school leaving and the filtering of Roma youth into poor-performing vocational schools, professions with little demand within the labour market and poor career growth.

For example, in Hungary, the maximum age of compulsory education has been reduced; the scholarship programme monthly stipend of approximately 30-40 EUR (9,000-13,000 HUF) is not enough to offset the incentives to enter the labour market. Moreover, the scholarship support for vocational education is more advantageous and easier to access compared to the support provided to the general secondary education.

The Slovakian example presents a situation where Roma students are streamed into vocational, 'F' study programmes (often in segregated Roma-only schools or classes), which train students in low-skilled work with little demand on the labour market. 'F' study programmes students have the highest unemployment rates in the country. Segregation of a relatively large number of Roma students in these secondary education programmes and Roma student completing education for low-skilled jobs are emerging issues.

Support in university education

The RCM country reports present figures on the low participation of Roma in higher education intuitions. The figures align with the common statement that less than one per cent of Roma have graduated from university.[23] The dire state of university enrolment and completion among Roma is not represented in Member States' NRIS or other policy or programme initiatives as Roma-targeted state programmes are virtually non-existent, except in a small number of countries with narrow reach and support activities – for example, providing scholarships or small-scale programmes to increase aspirations.

In the CEE region, higher education is supported primarily through scholarship programmes implemented by NGOs, predominantly by the REF. Poland, Portugal, and Croatia are three Member States in which the RCM country reports identified state-supported university scholarships. Romania enforces an affirmative action measure reserving spaces and scholarships for Roma and poor students in state universities. The Portuguese "Opre" programme is an initiative to provide 30 higher education scholarships. This is the only state programme identified in the reports: it includes training, mentoring, and monitoring of scholarships holders' performance, as well as implementing programmes for the students' families. Poland administers higher education scholarships through its "Roma Programme".

There are examples of universal higher education scholarship programmes for socially disadvantaged students that are not targeting Roma. However, the reports state many Roma do not participate in such programmes due to lacking knowledge of their existence. There are state programmes implemented in secondary schools to support the transition of Roma or disadvantaged students to higher education.

Tackling discrimination and antigypsyism in education

Educational segregation

The RCM country reports mention a number of CEE Member States in relation to school segregation due to the ongoing infringement procedures against Hungary, the Czech Republic and Slovakia. Reports demonstrate that the segregation of Roma into separate schools, as well as separate classes, is widespread across Member States and name the main causes of segregation and barriers to desegregation: spatial segregation, streaming of Roma students into special schools, denial of enrolment, placing immigrant Roma outside of general classes and the "white flight" (i. e., a sudden or gradual large-scale decline in non-Roma enrolment in schools attended by Roma students, leading to emergence of monoethnic education).

In countries with the most sizeable Roma communities, segregation of Roma students is the strongest and implemented measures to desegregate the education system have not achieved their goals (the following figures have been included in RCM country reports citing different data sources):

- Bulgaria: 60 per cent of Roma students are enrolled in Roma-only classes;
- Czech Republic: 136 school with 30 per cent or more Roma pupils, out of which 86 schools with 50 per cent or more Roma pupils, out of which 12 schools are (quasi) Roma-only schools;
- Hungary: in 2007, there were 247 so-called Roma elementary schools (more than 50 per cent of pupils were Roma); by 2016, this number raised to 359;[24]
- Greece: 12 per cent of Roma students attend Roma-only schools and another 36 per cent attend schools where the majority of students are Roma;

[23] Bhabha, Matache, Simic, et. al (2018). *One in One Hundred: Drivers of Success and Resilience among College-Educated Romani Adolescents in Serbia*. Report Available at https://fxb.harvard.edu/2018/12/20/one-in-one-hundred-roma-value-education-but-face-racism-in-access/

[24] Kertesi Gábor (2018). *Roma gyerekekszegregációja a kożoktatásban*. Presentation available at: https://168ora.hu/data/cikkek/151/1519/cikk-151977/Kertesi_szegregacio_eloadas_2018_majus.pdf

- Romania: 27 per cent of all schools are segregated;
- Slovakia: the share of pupils attending classes with Roma-only peers increased from 20 per cent in 2011 to 25 per cent in 2016.

Recent reforms in Hungarian educational policies have increased the possibility to separate Roma from non-Roma in the education system: since 2010, there has been an increase in the number of church-managed schools. Church schools, financed by the state, have two separate educational models. The first one opens elite schools with demanding entry exams and requirements near disadvantaged areas. The second one opens schools in socially disadvantaged and segregated neighbourhoods. The combination of these two models allows non-Roma parents to have their children educated without the presence of Roma children. Church schools, which primarily educate Roma students, are reported to be of poor quality.

The country reports also address the issue of Roma parents' fear of retaliation from the authorities and a lack of knowledge regarding ways to combat segregation. In the Czech Republic, some Roma parents are not aware that they can enrol their children in schools outside of their catchment areas and appeal the headmasters' refusals of enrolment. Furthermore, a third party is at times required when enrolling a Roma child to ensure equal treatment. Due to Roma students' experiences of bullying and discrimination from teachers and other students, many Roma parents do not challenge segregation or placement in separate classes because they believe that separate classes and schools provide a safer environment for their children.

The placement of Roma children in separate classes and special schools is also prevalent in Members States with smaller Roma populations. Such streaming is based on the false perception of a learning disability diagnosed through discriminatory psychological tests, poor language skills, lagging behind the rest of the class and poor behaviour.

The placement of immigrant Roma children in separate classes occurs due to poor language skills and insufficient school inclusion. The Austrian, Belgian, French, German, or Polish reports indicate that immigrant Roma children are often placed into separate classes or schools with the intention to increase their language skills and integrate them into the general education system. However, these separate classes do not have the intended effect as students are placed with other immigrant children, classes exceed the necessary time allocated, they do not adequately develop students' performance and generally, they are of poor quality.

Other manifestations of antigypsyism and discrimination in education

Apart from segregation, the most frequently reported and impactful form of antigypsyism was bias and prejudice by teachers and other school staff, ranging from ignorance and unequal treatment to racist statements.

The discrimination against Roma students by school staff is related to the pedagogical training teachers receive. Few Member States run compulsory courses on teaching in multicultural, mixed and socially disadvantaged classrooms, let alone especially working with students of Roma origin. In Hungary, while the concept of intercultural education has not been accepted as a basic principle and is only partially implemented, the National Core Curriculum emphasises that the development of interest in intercultural communication and overcoming prejudice should be a crucial part of attitude development in public education. In reality, however, there are only a few pedagogical schools which incorporate courses on intercultural education into their curriculum.

With multicultural and antidiscrimination methods being compulsory in pedagogy training, there are continuous challenges in ensuring a classroom is free from discrimination. This dilemma was presented in the Latvian report: the topics are compulsory, but teachers have difficulty with accepting the principles and implementing them in the classroom. The report stated that there is an improvement in the educational outcomes of Roma students whose teachers took courses on the topic of Roma inclusion.

Many country reports pointed out teachers' low expectations of Roma students, creating barriers for Roma to aspire and obtain higher education and quality employment. In some of these instances, the dimension of ethnicity intersects with gender. An example from the Czech Republic demonstrates how teachers' low expectations of Roma girls have been institutionalised in the education system: a 2014 preparatory class titled "Project Day" provided six and seven-year-old girls with information and training on becoming a cleaning lady and how to clean. Even worse, in Slovakia, some 600 Roma girls are enrolled in a programme taught in segregated secondary schools, "A Practical Lady" – offering skills such as preparing a shopping list, cooking or gaining hygienic habits – that not only provides no opportunity to gain qualified work, but also reinforces the troubling sexist and antigypsyist stereotypes about Roma women.

Another widespread form of antigypsyism manifested by school actors is bullying by peers. For example, the Polish report indicates that teachers little or do not react at all to the Roma children reporting racist stigmatisation or that a problematic behaviour of a Roma and non-Roma child ends with a more lenient punishment for a non-Roma child. Or, the Romanian report presented a study finding according to which 42.5 per cent of teachers would not want a Roma as their neighbour. The German report presented some study findings according to which 70 per cent of Sinti and Roma students have faced bullying or other prejudices in school. The impact that bullying has on a child's mental health can be immense as shown by an example from the Czech Republic, where a Roma girl attempted suicide after experiencing long-term bullying and harassment.[25] Therefore, teachers should be trained to identify, report and address discrimination and racist bulling in their classrooms. However, in reality there are only few measures implemented by Member States to combat teacher bias towards Roma pupils or parents, although most of the work is conducted by civil society organisations and Roma NGOs. The Austrian report even notes that teachers have no direct legal duty to report and address discrimination in their classroom.

Across all countries, there is little or no curriculum on Roma history, culture and community. Where there is a state curriculum that mentions Roma, its breadth is narrow, and teachers present teaching materials inadequately. Examples of good practice include smaller local training modules for teachers on including Roma history and culture in the mainstream curriculum. However, there tends to be a lack of interest from the teachers, who are not motivated by incentives. Since 2014, the Italian NRIS has specifically implemented legislation and measures on the inclusion of the *Porrajmos* in the state curriculum. However, there have been challenges in fulfilling the goals, and new measures are planned for June 2019.

Main tools in tackling Roma educational challenges

Several Member States are utilising ESIF to increase ECEC infrastructure to create additional capacity and especially in areas with a relatively high Roma population. Since 2016, Slovakia has allocated 80 million EUR from ERDF funds to increase kindergarten capacity. One of the prerequisites to access funding is for at least 30 per cent of children enrolled in such new spaces to be Roma. Additionally, ESIF support is being allocated in Romania to increase the availability of spaces in kindergartens, as well as increase the number of ECEC educators.

An example of placing ECEC among political and budgetary priorities comes from Poland. The government has designed Roma-targeted ECEC measures in connection to the NRIS in order to facilitate Roma children's access to mainstream ECEC services. Government's Roma Programme has invested 1.75 million EUR in ECEC initiatives. These initiatives are Roma-targeted and NGOs and Roma civil society organisations have partnered in the implementation process to ensure Roma children's participation. While this is a promising

[25] *Roma girl attempts suicide after bullying at her primary school in Czech town*, Romea.cz, 30 October 2018. Available at: http://www.romea.cz/en/news/czech/romani-girl-attempts-suicide-after-bullying-at-her-primary-school-in-czech-town

measure, there is still a shortage of kindergartens as well as communities that are far from any institutions. In this case, community centres, and primarily Roma NGOs, provide pre-school services.

Romania and Hungary have combined three main approaches to address early school leaving which include vocational school scholarships, remedial education, and second chance education. The Romanian "ROSE" project funded by a 200,000,000 EUR loan from the International Bank for Reconstruction and Development provides remedial and tutoring classes, as well as career counselling and infrastructure. Additionally, Romania is using ESIF for increasing schools' resources. Another policy approach taken by Romania to support access to and completion of secondary school is the use of affirmative measures that allocate places for Roma students in upper secondary and vocational schools.

There are not many Member States that applied for ESIF to address early school dropout. One positive example is the "Reserved Cities" project administered by Italy's Ministry of Labour and Social Policies. The project targets 15 cities with high levels of educational issues, including dropout. The project targets whole classes and involves families and local organisations. Roughly ten per cent of student participants are Sinti or Roma. The project is holistic in that it provides workshops and activities targeted to families, as well as building more inclusive schools and other measures to reduce school dropout.

The Polish RCM reports note that the Roma Programmes designed and implemented by the state provided financial support from ESF to the vocational training programmes, and, while it is small in scope, it provides Roma with a wide range of activities, which seems to be a positive attempt to improve vocational training and transition to employment. The programme implements the following activities: meeting with a vocational counsellor, psychologist, job assistant, and a lawyer. Additional activities outside of meetings include soft skill training, vocational training, and a four-month job placement.

There is a shortage of educational policies and programmes to support Roma students' access to higher education and improve their school performance. Affirmative action measures are scarce, with Romania reserving places for Roma students and Hungary providing additional burdens in the case of university applications if the candidate comes from a socially disadvantaged group. There are large scale model programmes implemented by NGOs in several countries (for example, the Roma Education Fund scholarships and "Roma Versitas"), as well as small scale ones, such as in Portugal, where the "Opre" programme provides 30 scholarships and mentoring support to Roma students, as well as additional measures targeting the student's family.

RECOMMENDATIONS

Employment

1. To improve the employability of Roma jobseekers, Member States' governments should introduce or strengthen existing measures to ensure access to mainstream social and employment policies and services that support labour market integration; and introduce new policies that address the specific needs of Roma communities, such as training in basic skills, mentoring, or debt counselling.

2. Member States should ensure stable, predictable funding for Roma targeted policies, especially local development programmes, which typically require five to ten years to bear fruit; and improve the coordination between various programmes and between agencies working with Roma communities or individuals.

3. Member States should establish or improve monitoring tools to enable the assessment of the accessibility and effectiveness of existing mainstream or regionally targeted policies. Exploit options to link survey data with administrative registers in an anonymised way, which can yield specific indicators disaggregated by ethnicity and gender without violating laws on personal data protection and ethnic profiling.

4. To reduce labour market discrimination and exploitation, Member States should strengthen the monitoring and enforcement of existing antidiscrimination policies; require public employment services to develop and implement protocols for proactively addressing employment discrimination; introduce or upscale programmes that promote the hiring of Roma in the public sector; review and strengthen regulations on working conditions and equal pay; introduce or strengthen awareness-raising activities.

Housing and essential public services

5. Member States should collect data on housing conditions and segregation of Roma populations that will constitute the basis for drafting better Roma housing policies and fighting against illegal discrimination in housing.

6. Member States with Travellers populations should guarantee actual access to appropriate halting and residential sites with adequate service access; if responsible authorities fail to meet their duties, the central government or third parties should provide such services at the expense of the responsible government.

7. Member States should launch programmes that improve the housing conditions of selected Roma communities and observe whether they can be scaled up. Such initiatives should promote integrated and multi-agency approaches to housing issues via ERDF and ESF and tackle both the physical conditions and social improvement of the neighbourhoods.

8. Member States should fight spatial segregation in housing by enforcing existing antidiscrimination legislation and by ensuring that public funding is not invested into housing projects that would segregate Roma. Instead, they should support projects targeting the inclusion of Roma families in socially and ethnically mixed neighbourhoods. Development of social housing in segregated areas should be prevented as this minimises the social inclusion effect of such services.

9. Member States should revise their housing allowance systems to ensure their reach out to all the people in need (i.e. to remove possible elements of indirect discrimination in eligibility and distribution), set up housing allowance amounts to levels that will effectively enable access to standard housing in integrated neighbourhoods and support physical mobility to areas with available employment opportunities.

10. Member States should reinforce the fight against the discrimination of Roma in accessing housing, both private and public; in particular, the practice of allocating

social housing to Roma in segregated neighbourhoods only must be stopped. The fight against discrimination should include strengthening complaint reporting, monitoring, awareness raising and assistance to victims.

Impact of healthcare policies on Roma

11. Member States without *de iure* universal, free health insurance coverage should review whether and how their health insurance system fails socially excluded groups and, if needed, take reasonable measures to remedy the situation. Where out-of-pocket medical expenses or co-payments are a factor in the healthcare system, they should assess to what extent healthcare affordability affects indigent citizens' health status and what policy changes could mitigate that.

12. Member States should gather health statistics, collect reliable and detailed data and produce and review evidence concerning Roma and the health gap between Roma and non-Roma for policy purposes (including mapping needs and barriers faced by vulnerable subgroups of Roma, especially children, youth, women, elderly and LGBTIQ) in a manner that fully safeguards their rights to privacy, and EC and FRA can support them in such efforts. In Member States where there exists a marked health gap between Roma and the majority population, public resources commensurate with the size of the health inequality should be expended to address it.

13. EC should support transnational cooperation among Member States aimed at a better coordination of policies to improve intra EU-mobile Roma's access to healthcare in the country of their *de facto* residence (as opposed to that of their citizenship).

14. Member States, in which providing information about healthcare to Roma patients and their families is hindered by linguistic, educational, social, cultural and other factors or distrust, should put adequate mechanisms in place to improve the situation. This may potentially include hiring more Roma as healthcare personnel, the training of healthcare providers in intercultural skills and/or training or other apposite measures.

15. Member States should make sure that adequate low-barrier complaint mechanisms and legal redress are available in order to investigate reports of anti-Roma discrimination and antigypsyism in healthcare; that such cases, if proven, are remedied; that information on such cases is publicly available; and that policy lessons are drawn from such cases and incorporated in national policies.

Education

16. The existing Roma-targeted programmes should be evaluated and extended to meet the high demand and to contribute more to the improvement of the educational level of Roma.

17. Member States, where segregation of Roma pupils in special education or mainstream education (in the form of concentration of Roma pupils in separate classes or schools) exist, should pilot approaches to active desegregation. This will require a wider territorial approach and combination of different interventions, including administrative measures (e.g. reform of catchment areas, compulsory cooperation of different stakeholders), investments in school and transport infrastructure, training of teachers, cooperation with parents and fighting the prejudice.

18. EC should enforce the proper application of the antidiscrimination law in education in Member States, in particular in relation to the segregation of Roma children. This should include following-up on the infringement proceedings, coherent application of the antidiscrimination principle and achievement of desegregation goals as a primary condition for any use of the ESIF in the field of education by Member States, as well as setting up safeguards against the use of ESIF for operations that pose segregation risks, or do not contribute to desegregation, when such element is possible.

19. Access of Roma children to quality education must be ensured, especially in cases where access to public services, such transportation is limited or absent, and in

situations of growing residential segregation that makes it impossible for many children to access quality mainstream education.

20. Member States should strengthen the mandate and responsibility of national school inspectorates to specifically oversee the education of Roma students and to facilitate and support the desegregation of Roma pupils.

21. Member States should set up specific and measurable ambitious goals (such as the introduction of compulsory and free kindergarten for two-year-old children, or increase the participation of Roma youth in education beyond the compulsory age) for the education of Roma in their national strategies – both in the relevant mainstream sector strategies, and in their special Roma strategies (if such strategies exist).

22. Member States should adopt measures aimed at parental involvement and cooperation as tools into their education systems, whether centralised or decentralised.

23. EC and Member States should initiate targeted support for children and youth to participate in discussions about their rights, education and future.

ANNEX – THEMATIC FICHES

Comparative analysis of data from all 27 member states per topic is available in the thematic fiches available online through these links:

- Education
- Employment
- Healthcare
- Housing

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