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Delegations will find attached document SWD(2023) 3 final – Part2/2.

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PART 2/2

COMMISSION STAFF WORKING DOCUMENT

Accompanying the document

**COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN
PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL
COMMITTEE AND THE COMMITTEE OF THE REGIONS**

Assessment report of the Member States' national Roma strategic frameworks

{COM(2023) 7 final}

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National Roma Strategic frameworks in the Western Balkans region

INTRODUCTION

Western Balkans leaders, within the Poznan process, committed¹ to develop and adopt national Roma strategic frameworks (NRSFs) in line the EU Framework 2020-2030 and according to their national contexts and circumstances, also taking into consideration the size of Roma population living on their territories.

The Commission services (DG NEAR) analysed the information provided in each of these NRSFs to assess to which extent the measures included reflected the particular challenges of Roma living in the Western Balkans and Türkiye and whether the measures were ambitious enough to ensure meaningful progress and achievement of their set national targets. All candidate countries and potential candidates, adopted new NRSFs, except Türkiye.

In June 2022, following European Commission Opinions, the European Council gave Ukraine, Moldova and Georgia a European perspective, while Ukraine and the Republic of Moldova were also granted the candidate status. Due to the recent nature of these decisions none of the three countries are included in the assessment even though Ukraine and the Republic of Moldova have National Roma Strategies.

This Staff Working Document (SWD) provides the specific assessment of the NRSFs in the Western Balkans following the same methodology and structure than that for the Member States.

¹ 6 November 2020 Western Balkans Sofia Berlin Summit, conclusions related to Poznań Declaration of Western Balkans Partners on Roma Integration within the EU Enlargement Process.

ALBANIA

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	National Action Plan for Equality, Inclusion and Participation of Roma and Egyptians in the Republic of Albania (2021-2025) (NAP)
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 115,000; 3.59% of total population
National Roma Contact Point (NRCP)	Directorate of Social Inclusion Policies and Gender Equality within the Ministry of Health and Social Protection.

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
Placed in the Ministry of Health and Social Protection, the NRCP is in close cooperation with line ministries and subordinate institutions – all are responsible for the Action Plan's implementation. More than 200 public officials are directly involved as Roma focal points. Municipalities with an extensive Roma population have also designated Roma focal points and local action plans. National Roma Contact Point is tasked to conduct an annual monitoring of the National Action Plan and a final evaluation.	Strengthening of inter-ministerial as well as national and local coordination is needed due to limited administrative capacities to work directly on the Roma inclusion file at national and regional level. There is no mentioning of EU fund managing authorities in the coordination of cross-governmental discussions on the distribution of EU funds for Roma and Egyptians (R&E) and related systematic monitoring of its use.

HORIZONTAL OBJECTIVES

1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION

1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA

KEY FEATURES	AREAS FOR IMPROVEMENT
The NAP states in Policy Goal 7 that: Antigypsyism is recognised and addressed in public policy as well as through systemic and structural changes to ensure a discrimination-free society for Roma and Egyptians (R&E). State institutions will focus on (1) recognition and inclusion of antigypsyism in public policy, (2) raising awareness of R&E about their rights and the general public, (3) reducing discrimination and improving access to justice and (4) minimizing/eliminating hate speech and hate crimes against R&E.	The implementation of antigypsyism principles and data collection should be improved, along efforts to avoid slow-paced and barriers in completing, supplemented by-laws and secondary legislation. While data collection continues to be a significant gap, the NAP lacks comprehensive and updated statistical data on hate crimes; overall data is not disaggregated according to ethnicity, making it difficult to know the real dimensions of the problems.

1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION

KEY FEATURES	AREAS FOR IMPROVEMENT
The NAP covers elements such as identification, promotion and conservation of Roma and Egyptian culture heritage. The Ministry of Culture and the Fund for National Minorities support artistic-cultural projects in order to promote R&E identity,	There is a lack of specific measures in order to foster positive narratives about Roma and Egyptians. NAP needs further strengthening in this regard.

culture and history at national and local levels.	
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NAP substantially covers aspects related to reducing poverty and social exclusion among Roma and Egyptians by including measures to invest in development and housing, access to adequate social protection schemes, and income support and activation measures.	The NAP inadequately addresses areas of preventing and combatting child poverty. It also lacks measures to support financial literacy for young adults and families.
3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
<p>The NAP involves policy initiatives that indirectly can enhance empowerment, cooperation and trust among the Roma and Egyptian population.</p> <p>The NAP includes elements of ensuring promotion of social, economic, political, cultural and civic participation, including for R&E women and young people, awareness of human rights and citizen's rights and responsibilities.</p>	The NAP does not include sufficient measures to ensure capacity building and leadership in Roma and Egyptian civil society and involvement of young Roma people in decision-making processes. Overall, more measures are needed for the empowerment, cooperation and trust objective.

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	The NAP explicitly states in its policy goal: increasing equal access to quality and inclusive education for Roma and Egyptian at all levels of education. Measures included in the NAP are related to prevention of segregation, promotion of equity, inclusiveness and diversity, raise awareness among teachers and other school staff of Roma and Egyptian history and culture, and acquiring of skills for labour market needs.	The NAP inadequately addresses certain issues and does not include measures related to areas such as prevention and elimination of misdiagnosis, inclusion of effective methods for recognition and reparation of past injustice, strengthening of parental involvement in the education of Roma pupils, combating of bullying and harassment.
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	The NAP includes specific policies providing equal opportunities for quality and sustainable employment for Roma and Egyptians through vocational training, programs aimed at youth and adults access to current job opportunities and self-employment, which indirectly tackles current labour market discrimination.	<p>The NAP does not provide sufficient measures to increase social labour market mobility neither nationally nor locally.</p> <p>More direct measures are needed in order to combat, reduce and eliminate discrimination online and offline, to reach out to young R&E and to enhance employment in public and private sectors.</p>
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY	The NAP aims specifically at (1) improving the health of R&Es by enhancing their access to quality health and preventive services, (2) setting up and strengthening the	The NAP does not include adequately measures related to fighting digital exclusion in healthcare, measures related to women, children and vulnerable

HEALTHCARE AND SOCIAL SERVICES	health mediator's position, (3) strengthening health information and promotion of structures for health care services, and (4) reducing the number of Roma and Egyptian minority members with infectious sexually-transmitted diseases.	groups in all aspects of health services. The NAP lacks measures to prevent institutionalisation and promote a transition from institutional to community, family-based care.
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	In the NAP there are measures aiming at (1) improving housing conditions for members of the Roma and Egyptian minorities and legalising all informal settlements, and (2) Improving and furthering access of R&Es to social housing protection programs.	Concrete measures are missing concerning targets related to improvement of housing infrastructure, monitoring, prevention and combatting of any spatial segregation, preventing evictions, improving access to essential services and reduction of exposure to pollution.

MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	Baselines are used in different policy goals and specific objectives.	N/A
TARGETS	Targets are incorporated in the NAP.	N/A
INDICATORS	Indicators are included as well in the monitoring framework of the NAP.	N/A

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local Civil Society Organisations (CSOs), equality bodies)	The NAP has been developed in close cooperation with relevant ministries, municipalities, IOs, CSOs, experts and Roma representatives. UNDP and the Council of Europe provided technical assistance throughout the process. The NAP envisages to strengthen and increase the participation of Roma and Egyptian CSOs in order to represent the interests and rights of these minorities.	In the NAP, the close cooperation is mentioned descriptively and not elaborated in detail.
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS	The combination of mainstream and targeted measures planned in the national action plan consider specific local challenges and explicitly addresses barriers depriving Roma and Egyptians of equal access to mainstream policies.	The NAP does not address sufficiently enough other relevant EU initiatives and diversity considerations.

F U N D I N G	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	N/A	Inclusion and connection with EU funding needs to be addressed and incorporated.
	OTHER SOURCES OF FUNDING	<p>The NAP envisages an overall implementation costs of EUR 38,332,708, which will be financed from various sources, but the state budget remains the main source included in the national Medium-Term Budget Programme (MTBP).</p> <p>The state budget is expected to finance the implementation of the plan at 78.3% of the indicative costs, 14.0% is expected to be financed by Local Government Units (LGUs) and 0.8% by donors.</p> <p>Budget and budget analysis included and outlined in the NAP. The NAP includes a policy specific budget both in LEK and EUR.</p>	<p>Monitoring of the implementation is not sufficiently addressed in the NAP. The NAP is inadequate in the area of enabling good practice exchanges between authorities at central and local level and civil society organisations.</p> <p>The NAP could address funding needs on local level including those of urban areas more comprehensively.</p>

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

The Law on Social Housing approved by the Parliament in May 2018 forbids forced evictions of individuals/families from their residences. The law also provides that up to 2 years upon its entry into force, not less than 5% of social housing to be reserved for the members of the R&E communities. However, secondary legislation has not yet been fully enacted, which is addressed in the NAP as a measure to be accomplished within the period 2021-2025.

BOSNIA AND HERZEGOVINA

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	<p>Action Plan of Bosnia and Herzegovina for Social Inclusion of Roma (2021-2025) (APBIH); Framework Action Plan on the Educational Needs of Roma Men and Women in Bosnia and Herzegovina (2018-2022).</p> <p>Strategy of Bosnia and Herzegovina for Resolving the Problems of Roma 2005.</p>
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 58,000; 1.54% of total population
National Roma Contact Point (NRCP)	Assistant Minister of Human Rights and Refugees.

NATIONAL ROMA CONTACT POINT	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRCP comes from the relevant line ministry and has an adequate mandate and institutional authority.	<p>The strengthening of the NRCP capacity is not foreseen in the Action Plan and reinforcement is needed on its administrative capacity and involvement in the programming and implementation of EU Funds.</p> <p>Coordination with other relevant ministries at state, entity and cantonal levels as well as coordination with local authorities needs to be enhanced.</p>

HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
<p>The Strategy, as well as the Action Plan, envisages a set of measures related to the fight against antigypsyism and discrimination. The Strategy defines measure 14: Non-discrimination of Roma and raising awareness on the need for Roma inclusion in all social processes in Bosnia and Herzegovina.</p> <p>Action Plan sets the following goals: Goal 1: Strengthen the system of support, coordination and supervision, reduce discrimination against Roma and combat antigypsyism.</p> <p>Measures to implement this goal include: MEASURE 2 – Strengthen the system for combating discrimination with the aim of elimination of antigypsyism, with activities on monitoring and analysing occurrences of discrimination and antigypsyism; provision of free legal aid for Roma; awareness raising; addressing prejudice, stereotypes and discrimination, including discrimination of Roma in education.</p>	<p>Specific references missing, such as: incidents both online and offline; measures to fight multiple and structural discrimination against Roma, in particular reference to LGBTIQ, elderly and Roma with disabilities.</p>

1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
<p>The Strategy addresses these aspects under section 11: Maintenance and improving cultural identity and tradition, learning of the Romani language and establishment of Roma spiritual and cultural institutions and associations.</p> <p>The Framework Plan and AP Bosnia and Herzegovina include:</p> <p>Goal 1: Texts on Roma culture and history are included in the existing curriculum and text books (4 measures are identified);</p> <p>Goal 2: Romani language included in the schools as optional language (7 measures identified).</p>	<p>The monitoring system and data collection need to be further strengthened to improve reporting on the level of implementation.</p> <p>The strategy does not include specific measures on Holocaust commemoration, and measures to foster positive narratives about Roma and Roma role models, as well as to promote a better understanding of the challenges that Roma face.</p>
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
<p>The Strategy includes goals and measures aimed at addressing poverty in the field of: employment (section 2), housing (section 3), social security (section 5), demographic and population policy, domestic matters, gender equality and children's rights (section 13).</p>	<p>The measures are not clearly specified with regards to preventing and combating child poverty or for supporting financial literacy for young adults and families.</p>
3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
<p>The Strategy includes participation and partnership with the authorities, addressing political participation of Roma in working bodies of legislative and executive authorities of Bosnia and Herzegovina, and ensuring their participation in public and political life.</p> <p>The Strategy includes measures to: maintain and improve regional cooperation of Roma in the Western Balkans and Türkiye; continue participation in the work of the Council of Europe bodies; improve the work and professional support of the Roma Committee of the Bosnia and Herzegovina.</p> <p>Council of Ministers; create a platform for cooperation with Roma association's and other CSOs; support participation of Roma women and youth in all relevant bodies, and encourage employment of Roma in the public sector.</p>	

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	The Strategy refers to an Action Plan for Roma Education focusing on improvement of enrolment of Roma in schools; conducting an analysis of contents related to Roma history and culture in curricula and text books, including concerning discriminatory and stereotypical mentions of Roma; provision of professional training for Romani language teachers at higher education institutions; and prevention of prejudice, stereotypes and discrimination.	Measures of the Strategy do not explicitly include prevention and elimination of misdiagnosis leading to inappropriate placement of Roma pupils in special needs education, and combating school bullying and harassment, both online and offline.
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	<p>Foreseen measures include ensuring funds for implementation of Roma employment programmes providing grants for employment of Roma with a focus on greater employability of women and youth, and encouraging employment of Roma in public sector.</p> <p>The Council of Ministers will support authorities at lower levels to plan regular funds in the budget for Roma employment and subsidising the legal persons, including private enterprises and companies, which have designed programmes and hire Roma people.</p> <p>The Strategy includes measures to 1: improve and support the employability and employment of Roma.</p>	Measures do not explicitly include support for first work experience and job placements, apprenticeships and career development, support for acquisition of digital skills and labour market mobility.
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	Health care is addressed through measures focusing on provision of health insurance and health care to all Roma schoolchildren; education and awareness raising about particular diseases such as tuberculosis, jaundice; addictions and the possibility of their prevention and successful cure; education on family planning, vaccination of new-borns, maternity counselling, and decreasing health risk factors among the Roma population.	Measures do not explicitly include: Roma children vaccination although this was foreseen in the Strategy; fighting digital exclusion in access to healthcare; measures to ensure access for Roma to community and family-based services for people with disabilities, elderly people and children deprived of parental care; measures to prevent institutionalisation and transition from institutional to community, family-based care.

7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	The Strategy indicates that the authorities will develop and implement a Roma housing policy that facilitates integration and fight segregation. It includes: improvement of housing conditions of the Roma population; initiating and accelerating legalisation of all informal settlements and providing Roma living in illegal housing units with permanent, decent and affordable; improvement of housing infrastructure in Roma settlements and wider community.	Some of the measures are not clearly specified, such as: ensuring access to environmental services, transport, financial services and digital communications; preventing forced evictions by promoting early warning and mediation; addressing the negative health impact of exposure to pollution and contamination.
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MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	<p>The Strategy indicates official data as baselines for employment and education.</p> <p>The health area lacks data on the number of uninsured Roma while general data is used in addressing health and cases of discrimination. Information from the legal government units on housing is used as a baseline.</p>	The baselines are indicated but a clear link with the relevant indicator is missing.
TARGETS	<p>Targets were identified in consultation with representatives of all relevant institutions and organisations that cooperate in the implementation of the Strategy.</p> <p>Targets aim to align with the Poznań Declaration² measures and the EU Strategic Framework for Roma Equality, Inclusion and Participation 2020-2030.</p>	Targets are indicated, although quantitative overall targets for all seven EU objectives, tailored to national circumstances, are missing as well as clear baselines.
INDICATORS	For each of the sectoral objectives, there is set of indicators outline.	Indicators are identified but clear link to the quantitative indicators are missing.

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	<p>Ministry of Human Rights and Refugees coordinated the entire drafting process, in close cooperation with the Roma Board.</p> <p>A working group was established consisting of relevant institutions, CSOs and international organisations.</p>	Although the existing Roma organisations have good cooperation with relevant institutions, including cooperation with the Roma Committee, there is a lack of a sustainable system of coordination and cooperation with all civil society organisations, Roma and non-Roma. However, the Strategy indicates plans for future improvement in this

² Outcome of the Sofia Summit on 6 November 2020 Sofia Summit, Poznań Declaration of Western Balkans partners on Roma integration within the EU Enlargement Process.

		The final document was published on e-consultation platform for further comments.	area.
	MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS	The Strategy is connected with the relevant mainstream sectoral policy initiatives such as equal opportunity policies, anti-racism and anti-discrimination, general social inclusion, education, employment, health or housing policies, child protection, gender equality under the section demographic and population policy, domestic matters, gender equality and children's rights are indicated. The action plan mainstreams Roma inclusion issues across objectives.	Clear links to relevant mainstreamed sectoral policies is sometimes missing.
FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	Reference is made to IPA instrument and EU is indicated as the cooperating organisation in the implementation of the Strategy.	
	OTHER SOURCES OF FUNDING	The Strategy indicate 2021-2025 budgets for all sectors in the action plan and its implementation relies mainly on the Bosnia and Herzegovina. budget and some donor funds, namely UNHCR, CoE, UNICEF, OSCE, REF.	

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

Involvement of Roma CSOs in defining and implementing required actions for the prevention of antigypsyism and discrimination has proven to be very promising in reaching the wider audience.

The Ministry of Human Rights and Refugees established the Roma Thematic Group where all relevant issues were discussed and further support defined. Several actions proved to be very effective in addressing antigypsyism and discrimination: involvement of Roma Women's Network; trust-building sessions with local service providers to address prejudice associated with providing services to Roma marginalized communities; supporting talented Roma and organising thematic events (such as support to the exhibition of a Roma artist, in the National Gallery Bosnia and Herzegovina; use of "Human library" designated to initiate discussion to challenge stereotypes and prejudices through dialogue.

KOSOVO*

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	<p>Strategy for Advancing the Rights of the Roma and Ashkali Communities in the Republic of Kosovo - 2022-2026.</p> <p>Action Plan 2022-2024 on the Strategy for Advancing the Rights of the Roma and Ashkali Communities in the Republic of Kosovo - 2022-2026.</p>
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 37,500; 2.07% of total population
National Roma Contact Point (NRCP)	Office of Good Governance (OGG)

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
<p>The Kosovo strategy provides the NRCP with adequate and necessary mandate, resources, staff capacity and institutional authority. The Office of Good Governance (OGG) is mandated to monitor the implementation of the new Strategy, Action Plan (and Local Action Plans (LAP). The monitoring process will be carried out by the OGG in cooperation with related institutions and broad participation of stakeholder groups, including CSOs municipal level and relevant ministries.</p> <p>Yearly evaluations of the national strategic framework will be carried out.</p>	<p>More efforts are needed in improving and strengthening vertical regular reporting and information shearing.</p>

HORIZONTAL OBJECTIVES

1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION

1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA

KEY FEATURES	AREAS FOR IMPROVEMENT
<p>The NRSF and AP includes measures related to the fight against antigypsyism and discrimination.</p> <p>Objective 5 of the strategy (Preventing and fighting discrimination, racism, hate speech, hate crimes, segregation, prejudice, stereotypes, and bullying) describes specific goals.</p> <p>The AP 2022-2024 defines the actions aiming to implement the Strategy objectives.</p>	<p>Although most of the measures defined in the EU Roma Framework are included through specific actions, there is a gap in certain references such as LGBTIQ, women, people with disabilities and elderly.</p>

* This designation is without prejudice to positions on status and is in line with United Nations Security Council Resolution 1244/1999 and the opinion by the International Court of Justice on the Kosovo declaration of independence.

1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF and AP include measures promoting, recognition and reconciliation, through the strategic objective 5.	<p>No specific reference is made to awareness of Roma History, Culture, neither actions to foster positive narratives about Roma and Roma role models, better understanding of the challenges that Roma face or support for inter-community encounters and inter-cultural learning.</p> <p>No reference is made to the Roma Holocaust and reconciliation processes in society, inter alia through relevant training for teachers and designing appropriate school curricula.</p>
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The NRSF includes some cross-cutting measures aimed at reducing poverty under objective 2 of the NRSF “Increasing equal access to sustainable employment and reducing poverty of Roma and Ashkali communities”.	There are no explicit or targeted sets of measures aimed at reducing poverty and social exclusion.
3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
The strategy and AP partially address this element by referring to employment of Roma in public and private institutions in order to support diversity and expertise within the policy process and in order to provide role model.	<p>There seem to be significant gaps in this objective as several measures of EU Roma Framework are not explicitly included, such as:</p> <p>actions to support active citizenship by promoting social, economic, political, cultural and civic participation, particularly for Roma women and young people;</p> <p>actions to promote capacity building and leadership in Roma civil society to enable Roma people to participate in all stages of the policy cycle and public life in general;</p> <p>actions to raise awareness of human rights and citizens' rights and responsibilities among the members of disadvantaged Roma communities;</p> <p>actions to coordinate resources, networks and expertise across sectors to increase the involvement of young Roma people in decision-making processes and help amplify their leadership.</p>

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM	This is partially addressed by the strategy and Action Plan. Strategic objective 1 on the effective increase of opportunities, equal access, well-being and inclusive quality	<p>Several measures of the EU Roma Framework are not explicitly included:</p> <ul style="list-style-type: none"> - Actions to prevent and eliminate misdiagnosis; - Actions for effective parental

EDUCATION	education for Roma and Ashkali communities.	involvement in the education of Roma pupils; - Actions to prevent early school leaving and drop out at all levels of education; - Actions to acknowledge the vulnerability of children of parents who have gone abroad.
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	The strategy and AP include the objective 2 ‘Increasing equal access to sustainable employment, and reducing the poverty of Roma and Ashkali communities’, and the sub-objective 1 on “improving access to equal participation in the labour market through the accommodation of members of the Roma and Ashkali communities in municipal employment offices and vocational training programs”.	The NRSF highlights some objectives but no implementing measures under the AP related to: - Objective 2 - Increasing participation and employment opportunities through awareness raising (...); - Objective 4 - Establishment of an institutional mechanism by the Government for promoting and coordinating the employment of Roma, Ashkali communities in public institutions. Several measures of the EU Roma Framework are not explicitly included: - Actions to reach out to young Roma regarding employment; - Actions to support labour market mobility.
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	The strategy and AP includes the objective 3 ‘Improving the health of members of the Roma and Ashkali communities and increasing equal access to quality healthcare services’.	Several measures of EU Roma Framework are not explicitly included: - Measures to fight healthcare digital exclusion; - Measures to promote equal access to medical studies for Roma people; - Measures to ensure recognition of and reparation for past injustices in the area of healthcare; - Measures to promote research on and the prevention of diseases that are more prevalent among persons at risk of poverty.
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	The strategy includes the objective 4 ‘Increasing equal access to sustainable housing, essential services and public infrastructure for the Roma and Ashkali communities’.	There is no implementing measure under the AP related to the following strategy objective: - Objectives 5 - Formalization of informal settlements of Roma and Ashkali communities (...); - Objectives 6 - Equal access to essential services (...) and fighting spatial segregation as a cause of environmental discrimination in

		housing. Several measures of the EU Roma Framework are not explicitly included: - Measures to monitor, prevent and combat any spatial segregation and promote desegregation; - Measures to provide social support and access to mainstream services for homeless Roma people.
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MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	The Action plan describes some base values for all indicators for the strategic objectives.	Baseline (Base value) missing for several objectives.
TARGETS	The Action plan specifies provisional targets and last year (2024) targets for indicator for all 5 strategic objectives.	Targets missing for several objectives.
INDICATORS	The Action plans describes detailed indicators for each specific objective under the 5 strategic objectives.	

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	The drafting of the strategy NRSF and Action Plan was supported by the Regional Coordination Council - Roma Integration Project (RCC), the Organization for Security and Co-operation in Europe (OSCE) and the NGO VoRAE.	Local CSOs could have been more involved in the consultation process leading to the adoption of the NRSF. Also, although CSOs are foreseen to take part in the monitoring of the implementation of the strategy, their role is not specified implementation details.
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS	The drafting of the Strategy and Action Plan was supported by the Regional Coordination Council - Roma Integration Project (RCC), the Organization for Security and Co-operation in Europe (OSCE) and the NGO VoRAE.	There is a need to further mainstream policies in relation to Roma gender, equality and protection against racism and discrimination at the local/national level.
F U N D I N G CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	N/A	Inclusion and connection with EU funding needs to be addressed and incorporated.

G	OTHER SOURCES OF FUNDING	<p>The strategy provides a summary of the budget implementation of the plan by objectives. Total 2022-2024: 23,192.628 EUR.</p> <p>95% is planned to be supported by the Kosovo Government, and 5% by donors, who are often not specified.</p>	<p>A substantial part of the budget, circa 16,871.260 EUR, goes to the second objective related to employment and social protection, reflecting unbalanced budgeting, not considering post-COVID-19 and inflation.</p> <p>It is unknown what amount goes directly to Roma and Ashkali, since this is the fund for the overall services. It is still unclear whether the budget allocated for the strategy is distinct from the Kosovo budget for Social support and Services.</p>
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PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

MONTENEGRO	
APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	Strategy of Social Inclusion of Roma and Egyptians 2021-2025 and 2021 Action Plan
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 20,000; 3.17% of total population
National Roma Contact Point (NRCP)	By August 2022, no National Roma Contact Point designated

NATIONAL ROMA CONTACT POINT	
KEY FEATURES	AREAS FOR IMPROVEMENT
<p>Since the change of Government, following the national elections in Montenegro in August 2020, NRCP has not been nominated.</p> <p>Resources, staff capacity and institutional authority are not assured neither is NRCP role reinforced in the new Strategy and Action Plan.</p>	<p>Limited capacity remains a major weakness negatively affecting the implementation of policies, and the capacity of reaching the targets set in the NRSF and AP.</p> <p>The NRCP office needs additional resources, involvement in the programing and implementation of EU funds and wider institutional authority and ability for inter-ministerial coordination.</p>

HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
Montenegro's strategy includes Operational Objective 1 Improving the institutional and social fight against all forms of discrimination and antigypsyism faced by the Roma and Egyptian	Measures focussing on the development and promotion of a comprehensive system of support

communities. It includes measures to: fight multiple and structural discrimination; raise awareness of the fact that efforts to combat discriminatory practices are interwoven with efforts to tackle antigypsyism and social and economic exclusion; analyse and acknowledge the existence of antigypsyism and discrimination against Roma and raise recognition of those phenomena.	for victims is missing in both the Strategy and the 2021 Action Plan. The only measure foreseen for 2021 is the setting up of free legal aid to members of the Roma and Egyptian populations in processing discrimination case.
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
The 2021 Action Plan sets out measures on multi-cultural awareness-raising activities and campaigns in schools; awareness of Roma cultures, language and history, including the memory of the Roma Holocaust; positive narratives about Roma and Roma role models.	Further attention is required in order to design, finance and put in place actual measures which impact on communities on the ground.
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
<p>The Strategy tackles the reduction of material deprivation of the Roma and Egyptian populations as well as the difference in exposure to poverty compared to the general population, from 91% in 2021 to 85% in 2025.</p> <p>Regarding the multidimensional poverty of children, the aim is to reduce overlaps of the three most common deprivations for children 0-2, 0-5, 5-17 years old by 10% until 2025.</p> <p>Inclusion of adults in the programme of elementary functional literacy and the adapted primary school programme for adults, as well as in the programmes of vocational training and education, is planned with the support of civil society.</p> <p>2021 Action Plan further outlines the measures to reduce poverty ranging from assessment of the position of Roma and development of 3 pilot multi-sectoral programmes in order to reduce poverty.</p>	<p>Gaps remain in the area of preventing and combating child poverty and effective national measures that take account of the mechanisms that perpetuate multigenerational poverty and social exclusion.</p> <p>Funding to implement these measures is not clear.</p>
3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
The Strategy tackles the question of the lack of representatives of the Roma and Egyptian communities in local and the national parliament. Amendments to the Law on Election of Councillors and Deputies will be proposed in order to define the threshold for political representatives	Further support from political parties and the Parliament is still needed to better improve overall representation.

by 0.35% (as it is the case for Croatian minority in Montenegrin electoral legislation).	
Another measure is to improve and ensure the participation of representatives of the Roma Council and Roma and Egyptian NGOs in the creation of national/local policies aimed at improving their position. The increase in the percentage of Roma and Egyptians employed in the public sector by 2% by 2025 is also included.	

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	<p>The Strategy's Objective 5 raises the improvement of the availability, effectiveness and quality of education for all members of Roma and Egyptian population. The 2021 Action Plan sets out the related implementing measures.</p> <p>Most measures focus on efforts to increase the enrolment of children into pre-school, primary, secondary and university education (awareness raising, free transportation, scholarships, provision of equipment, learning support, tutoring and mentoring, data collection, free accommodation for Roma and Egyptian students in the dormitory, amendment of the Law on Higher Education).</p>	<p>Both the Strategy and 2021 Action Plan do not include measures to: prevent and eliminate any form of segregation in education; provide effective methods for recognition and reparation of past injustices; support the equal participation and active engagement of all pupils, including children with disabilities, in mainstream educational activities and processes; combat school bullying and harassment, both online and offline, in order to protect all pupils, including Roma; promote the acquisition of digital skills, access adequate digital infrastructure and provision of teaching materials for distance learning.</p>
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	<p>The Strategy tackles the issues of employment under Operational Objective 6: Provide access to quality and sustainable employment for members of RE population. The 2021 Action Plan sets out measures such as: tutoring; assistance in writing a CV, informing about available jobs; promoting entrepreneurship, such as business incubators; development of sustainable financial support programs for private sector employers to employ Roma and Egyptians.</p>	<p>Both Strategy and 2021 Action Plan are lacking measures targeting in particular young Roma (awareness raising; support for first work experience, job placements, apprenticeships and career development) and measures to support the acquisition of digital skills by Roma and Egyptians.</p>

	It is planned to strengthen cooperation between centres for social work and employment agencies to promote labour market participation, grant schemes to encourage employment and reducing the percentage of Roma and Egyptians employed in the informal sector.	
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	<p>The Strategy tackles the issues of Roma health and effective equal access to quality healthcare and social services under Operational Objective 7 Improve health care of RE population and increase equal access to quality health care system and social services.</p>	<p>The 2021 Action Plan sets out measures which are more of basic nature and not as targeted as the measures described in the EU framework.</p> <p>Both the Strategy and 2021 Action Plan do not focus on target groups such as women, children, vulnerable Roma populations, people with disabilities; do not include sufficient measures such as the ones proposed in the 12 March 2021 Council Recommendation, e.g. fight against digital exclusion, prevention of segregation in the area of healthcare services, reparation for past injustices in the area of healthcare, prevention of institutionalisation, research on and prevention of diseases that are more prevalent among persons at risk of poverty.</p>
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	<p>The Strategy tackles the issues under Operational Objective 4 To provide permanent, decent, affordable and desegregated housing to members of Roma and Egyptian population living in settlements that cannot be legalised for justified reasons.</p> <p>The 2021 Action Plan sets out various implementing measures targeting analysis of the current situation and legalising the current housing facilities of (geographical mapping of Roma informal settlements; campaigns on legalisation; analysis of state of infrastructure and housing needs in Roma and Egyptians settlements).</p> <p>Other measures relate to</p>	<p>Both Strategy and 2021 Action Plan lack focus on: prevention of segregation in housing and “ghettoisation”; specific measures to prevent overcrowding; coordination mechanisms with local authorities and other ministries in charge of spatial planning, education, transport, energy and water supply.</p>

	awareness campaigns to promote desegregation and coexistence between the Roma community and the majority population.	
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MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE		Montenegro's strategy indicates that there is not enough statistical data; it does not publish Roma employment data; although in some areas, like education, there is some data available, it is missing from the strategy; data on health is also lacking. This matter should be addressed, in order to provide solid reference for measuring progress.
TARGETS	Some of the targets of the EU Roma Framework are included.	
INDICATORS	Some of the indicators of the EU Roma Framework are included.	

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	The committee for monitoring and reporting on the strategy and its action plans implementation is composed of different line ministries, public authorities and civil society organisations, under the umbrella of the Ministry of Justice, human and minority rights.	The strategy does not mention whether and how the Ombudsman institution will be involved.
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS	RSF is harmonised with the national umbrella and sectoral strategies, the following are also Roma mainstreamed: The Minority Policy Strategy 2019-2023, Plan of activities for achieving gender equality, National Strategy of Sustainable Development until 2030, Directions of development of Montenegro 2018-2021, Montenegro Economic Reform Programme 2021-2023, Strategy to Combat Human Trafficking 2019-2024, Strategy for Protection of Persons with Disabilities 2016-2021, Strategy for Prevention and Protection of Children from Violence 2017-2021, Strategy on Migration and Reintegration of Repatriates 2021-2025, Strategy for the Realization of Child Rights 2019-2024,	The mainstream implementation is rather problematic due to limited capacity of the relevant Ministry to develop project proposals.

		Inclusive Education Strategy 2019-2025, Youth Strategy 2017-2021.	
FUNDING	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	The NRSF relies on the budget of Montenegro and donor funds, mostly EU funds. Total cost of NRSF is estimated at 6.6 mil EUR for the period 2021-2025. Approximately half of the budget will be secured from the national budget and the other half from IPA funds.	There is the need for greater cooperation between the National IPA Coordinator office and the Roma coordinator.
	OTHER SOURCES OF FUNDING	There is budgetary allocation for the implementation of the Strategy allocated annually amounting to 1.25 mil EUR for the 5-year period. In the annual Action Plan, the budgetary allocations are more detailed, with indication of different Ministries or state bodies responsible, or if they come from municipal budgets.	Indicated amounts do not seem to be ambitious enough reflect realistically the needs of Roma at both national and local level. In addition, due to poor fundraising capacity of Roma department at the Ministry of human and Minority rights, amounts earmarked as donor funds might not be secured.

NORTH MACEDONIA

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	Strategy for Inclusion of Roma (2022-2030) (SIR)
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 197,000; 9.56% of total population National Census (2021): 49,104 of total population
National Roma Contact Point (NRCP)	Advisor for Roma Inclusion of the Prime Minister

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
<p>The NRCP is under the Office of the Prime Minister working in close cooperation with the Ministry of Labour and Social Policy. Its primary role is to ensure coordination and cooperation with all stakeholders.</p> <p>The Ministry of Labour and Social Policy is responsible for the coordination between the line ministries and governmental institutions to integrate Roma issues in respective policies and action plans.</p>	<p>The NCRP is in an advisory position without any staff assigned to it and without any institutional mandate.</p> <p>Responsibility of line ministries to report on a quarterly basis and Annual reporting from NRCP need to be improved. No mid-term evaluation stipulated in the SIR.</p> <p>The National Coordination Body supporting implementation of the strategy includes line ministries, CSOs, the Ombudsman, however it has limited political weight.</p> <p>The NRCP needs to be involved in the programing and implementation of EU funds.</p>

HORIZONTAL OBJECTIVES	
1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION	
1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA	
KEY FEATURES	AREAS FOR IMPROVEMENT
<p>The SIR includes objectives to better promote and acquaint others with Roma culture and reduce stereotypes, discrimination, hate speech, negative perceptions and anti-Roma narratives in society.</p> <p>Moreover, the SIR has included objectives to dismantle and prevent institutional discrimination experienced by Roma and establish and/or support programs and/or initiatives to fight anti-Roma crimes, hate speech and discrimination, while also ensuring to follow-up on cases in the judicial system where Roma complain on ethnic or racial grounds.</p>	<p>The SIR inadequately incorporates measures that fight multiple and structural discrimination against Roma (in particular, against Roma women, young Roma, Roma children, LGBTIQ Roma, elderly Roma, Roma with disabilities, stateless Roma and EU mobile Roma).</p> <p>The SIR does not have measures that includes tackling harassment, hate crime and hate speech against Roma in a digital environment.</p>
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
<p>The SIR includes specific measures in order to create institutions for development, nurturing and promotion of Roma culture, language and tradition.</p>	<p>The SIR does not include specific measures to strengthen positive narratives, Roma role models.</p> <p>Means to support inter-community encounters and inter-cultural learning should be improved.</p>
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
<p>The SIR has objectives and measures tackling poverty and social exclusion by ensuring material security and reducing the social exclusion of the Roma community by envisaging to reduce the poverty gap between Roma and the general population, and between Roma children and other children, by at least 50% by 2030.</p> <p>The measures outlined in SIR encompass investment in human capital and infrastructure development for Roma.</p>	<p>The SIR has inadequate measures related to social cohesion policy and financial literacy for young adults and families.</p>
3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
<p>These elements are to some extent enshrined in some areas but are vaguely addressed within the SIR.</p>	<p>The strategy does not present a specific section addressing participation, empowerment, cooperation and trust.</p> <p>There is a lack of specific measures tackling capacity building and leadership in Roma civil society, awareness of human and citizen rights, and involvement of young Roma people in decision-making processes.</p>

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	The SIR proposes ambitious objectives upon increasing the coverage of Roma children and students, reducing the dropout rate in primary and secondary education, increasing the number of students in higher education, and new opportunities for persons who dropped out of education.	The SIR has inadequate measures related to effective methods for recognition and reparation of past injustices, parental involvement in the education of Roma pupils, preventing and eliminating misdiagnosis.
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	The SIR incorporates the following measures which specifically aim at increasing the employment of Roma: employment in public and private administration, activation measures and services, formalisation and stimulation of entrepreneurship, reducing the rate of young Roma who are not part of education, and improving the digital skills of young Roma.	The SIR does not provide measures for support of labour market mobility and combat, reduce, and eliminate discrimination in employment.
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	The SIR stipulates objectives and measures in order to reduce infant mortality, increase coverage of Romani women with prenatal and postnatal care services, improve the accessibility of the Roma community to primary health care, and improve coverage and availability of preventive services for the Roma community.	SIR does not include measures regarding fighting digital exclusion, recognition of and reparation for past injustices in the area of healthcare, access for Roma to community and family-based services for people with disabilities, elderly people and children deprived of parental care, prevent institutionalisation and promote a shift from institutional to community, family-based care.
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	<p>The SIR has specific objectives and measures to ensure permanent, dignified and non-segregated housing for Roma by tackling urbanization of Roma settlements, legalisation of illegal dwelling where deemed possible, and measures providing permanent, decent, affordable and desegregated housing for Roma currently living in settlements that cannot be legalized for justified reasons.</p> <p>Other measures support projects for communal infrastructure, and reducing exposure to pollution and contamination in Roma settlements.</p>	The strategy is missing specific measures for integrated housing schemes targeting marginalised Roma people, and elements for support and strengthen the public authorities generally responsible for housing.

MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	<p>The baselines are based on previous reports.</p> <p>The SIR outlines an objective to improve the process of goal setting, data collection, monitoring and reporting, indicating that there is room for improvement regarding the empirics that the SIR is based on.</p>	<p>The SIR does not outline if full public disclosure of national reports on Roma equality, inclusion and participation is envisaged.</p>
TARGETS	<p>Targets in the SIR include national quantitative and qualitative targets, tailored to MK circumstances and is based on available equality data collection options.</p>	<p>Targets in some areas should be more aligned with the EU framework.</p>
INDICATORS	<p>The SIR use a set of portfolio of indicators developed by FRA and also the indicators coming from the Poznań Declaration.</p>	<p>Indicators shall be more tailor-made and aligned with EU ambitions.</p>

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	<p>The SIR stipulates that: the process of preparation of the Strategy for Roma Inclusion 2022-2030 is led by the Government of the Republic of North Macedonia through the Advisor for Roma Inclusion of the Prime Minister, as a National Contact Point for Roma in cooperation with the Ministry of Labor and Social Policy as the responsible stakeholder of the Strategy for Roma Inclusion 2022 - 2030, with technical support from the Regional Cooperation Council, project for "Roma Integration 2020".</p>	<p>The SIR does not explicitly outline support for conducting research and data collection neither in the area of providing guidance and training to the general public as well as for public and private organisations.</p>
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS	<p>The SIR is to some extent connected with the relevant mainstream sectoral policy initiatives such as equal opportunity policies, anti-racism and anti-discrimination, general social inclusion, education, employment, health or housing policies.</p>	<p>The SIR is inadequate on mainstreaming Roma equality and inclusion at regional and local levels as well as on how EU, national funds and other financial instruments will be invested for inclusive mainstream policy reforms and targeted action.</p> <p>The SIR does not include measures reflecting diversity among Roma. It lacks to some extent sectoral policy initiatives on gender</p>

FUNDING			equality and child protection.
	CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	SIR does not include funding requirements. Funding of SIR measures is planned to be proposed with the annual action programs.	Need to allocate adequate national resources for the implementation of the policy measures put forward by the SIR including EU funding. Need to encourage the use of national and Union funds to build the capacity of, and enable good practice exchanges between authorities at central and local level and civil society organisations.
	OTHER SOURCES OF FUNDING	The SIR does not include any budget commitments nor analysis.	

PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING

An inter-parliamentary group for the improvement of the situation of Roma is established in the National Assembly. This advisory body includes representatives from all political parties represented in the Parliament and facilitates discussions about the current and emerging Roma inclusion-related issues and facilitates provision of advice for policy reform, policy-making and actions to be undertaken.

SERBIA

APPROACH OF THE NATIONAL ROMA STRATEGIC FRAMEWORK (NRSF)	Strategy for social inclusion of Roma in the Republic of Serbia 2022-2030
ESTIMATED ROMA POPULATION Council of Europe estimates (plus national census data, where available)	CoE estimate (2012): 600,000; 8.23% of total population
National Roma Contact Point (NRCP)	Minister for Human and Minority Rights and Social Dialogue

NATIONAL ROMA CONTACT POINT

KEY FEATURES	AREAS FOR IMPROVEMENT
The NRCP, who is also the Minister for Human and Minority Rights and Social Dialogue, has an adequate mandate and institutional capacity.	Inter-ministerial coordination, as well as coordination between the national and local authorities, need to be strengthened.

HORIZONTAL OBJECTIVES

1. FIGHT AND PREVENT ANTIGYPSYISM AND DISCRIMINATION

1A. FIGHTING DISCRIMINATION, HARASSMENT, HATE CRIME AND HATE SPEECH AGAINST ROMA

KEY FEATURES	AREAS FOR IMPROVEMENT
Serbia's strategy includes: Objective 1 "Lower level of discrimination and antigypsyism as a form of racism against the Roma national minority"; Measure 1.1. "To improve and fully implement the legal and institutional framework in order to	Measures of the strategy do not explicitly include: a distinction between "online and offline" when fighting hate speech,; fighting multiple and structural discrimination against Roma (in particular, against Roma women, young Roma, Roma children, LGBTIQ Roma, elderly Roma,

ensure prevention of and protection from discrimination and antigypsyism, as a special form of racism”; Measure 1.3 “To raise awareness of the public, public services in particular, of the importance of the fight against discrimination and antigypsyism, as a special form of racism”.	Roma with disabilities, stateless Roma and EU mobile Roma).
1B. PROMOTING AWARENESS OF ROMA HISTORY, CULTURE, RECOGNITION AND RECONCILIATION	
KEY FEATURES	AREAS FOR IMPROVEMENT
Serbia’s strategy includes: Measure 1.2. “To empower Roma to access rights and preserve identity”.	Measures of the strategy do not explicitly include promotion of reconciliation processes in society; inter-community encounters and inter-cultural learning.
2. REDUCE POVERTY AND SOCIAL EXCLUSION	
KEY FEATURES	AREAS FOR IMPROVEMENT
Serbia’s strategy includes: Objective 6 “Improved housing conditions for the population of Roma nationality”; Objective 7 “Improved access to social benefits and social services for the Roma people”.	Measures of the strategy do not explicitly include preventing and combating child poverty and supporting financial literacy for young adults and families.
3. PROMOTE PARTICIPATION THROUGH EMPOWERMENT, COOPERATION AND TRUST	
KEY FEATURES	AREAS FOR IMPROVEMENT
Serbia’s strategy includes: Objective 2 “Improved participation of Roma in all social processes”; Measure 2.1. “To encourage participation of Roma, especially women and youth, in social, cultural and political life”; Measure 2.2. “To enhance the capacities of and cooperation within the civil society”.	The strategy includes main aspects of the EU Framework but measures should be more specific.

SECTORAL OBJECTIVES		
	KEY FEATURES	AREAS FOR IMPROVEMENT
4. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY INCLUSIVE MAINSTREAM EDUCATION	<p>Serbia’s strategy includes: Objective 3 “Developed education system as an inclusive, intercultural, non-discriminatory and safe environment for Roma and all other children, with ensured full inclusion in pre-school, primary, secondary and higher education, and provided support to functional education of adult Roma, including the enhanced effectiveness and efficiency of mechanisms for the fight against discrimination and antigypsyism, as a form of racism”.</p> <p>Preventing misdiagnosis leading to inappropriate placement of Roma</p>	Measures of the EU Roma Framework not explicitly included: preventing and eliminating segregation in education; combatting school bullying and harassment, both online and offline.

	pupils in special needs education.	
5. INCREASE EFFECTIVE EQUAL ACCESS TO QUALITY AND SUSTAINABLE EMPLOYMENT	<p>Serbia's strategy includes:</p> <p>Objective 4 "Increased access to viable and quality employment for the Roma people";</p> <p>Measure 4.1. "To implement and apply affirmative measures for employment of Roma in the public sector";</p> <p>Measure 4.2. "To develop new and consistently implement the existing Roma employment programmes";</p> <p>Measure 4.3. "Full and viable institutionalisation of the local mechanisms for Roma inclusion";</p> <p>Measure 4.4. "To fight antigypsyism, as a form of racism, and discrimination in employment";</p> <p>Measure 4.5. "To legalise work of Roma in the informal sphere, especially that of collectors".</p>	<p>Measures of the EU Roma Framework not explicitly included: measures to provide support to entrepreneurship and acquisition of digital skills; measures to support labour market mobility, particularly for those living in rural and segregated areas with limited job opportunities.</p>
6. IMPROVE ROMA HEALTH AND EFFECTIVE EQUAL ACCESS TO QUALITY HEALTHCARE AND SOCIAL SERVICES	<p>Serbia's strategy includes:</p> <p>Objective 5 "Improved health of Roma, including equal access to quality health care services and enabled full exercise of the right to health without discrimination, especially in the situations of crisis, in the health care system";</p> <p>Objective 7 "Improved access to social benefits and social services for the Roma people".</p>	<p>Measures of the EU Roma Framework not explicitly included: most aspects of healthcare for women, sexual and reproductive healthcare, and victims of gender-based violence are missing, except healthcare during pregnancy; healthcare measures for different types of vulnerable Roma population (such as elderly, disable, LGBTIQ, EU mobile Roma, third country nationals, and stateless Roma); measures to fight digital exclusion in access to healthcare.</p>
7. INCREASE EFFECTIVE EQUAL ACCESS TO ADEQUATE DESEGREGATED HOUSING AND ESSENTIAL SERVICES	<p>Serbia's strategy includes:</p> <p>Objective 6 "Improved housing conditions for the population of Roma nationality";</p> <p>Measure 6.1. "To legalise buildings that meet basic living standards";</p> <p>Measure 6.2. "To improve substandard buildings to meet basic living standards";</p> <p>Measure 6.3. "To provide municipal infrastructure to substandard Roma settlements";</p> <p>Measure 6.4. "To address the housing needs of homeless persons, internally displaced persons and persons of the Roma nationality who must be relocated".</p>	<p>Measures of the EU Roma Framework not explicitly included: measures to prevent forced evictions by promoting early warning and mediation; measures to prevent and tackle the negative health impact of exposure to pollution and contamination.</p>

MONITORING FRAMEWORK		
	KEY FEATURES	AREAS FOR IMPROVEMENT
BASELINE	The strategy includes some baselines.	In the area of employment, Serbia's strategy indicates that the official national source of statistical data does not publish Roma employment data and that the future Action Plan for the implementation of this Strategy will need to envisage mechanisms to monitor this data.
TARGETS	Some of the targets of the EU Roma Framework are included.	Some targets could be aligned closer with the EU Roma Framework targets.
INDICATORS	Some of the indicators of the EU Roma Framework are included.	Indicators could be aligned closer with the EU Roma Framework indicators.

OTHER ELEMENTS		
	KEY FEATURES	AREAS FOR IMPROVEMENT
PARTICIPATION OF KEY STAKEHOLDERS (NRCP, National Roma Platform, national, regional and local CSOs, equality bodies)	The Serbian authorities coordinating the drafting process (Coordination Body and the Expert Group) obtained the opinions of relevant institutions, as well as civil society organisations and the Roma community in Serbia.	<p>The process for adopting the strategy provided limited opportunities for civil society organisations to actively participate. Public consultations lasted for a short period (from 28 November to 5 December 2021). Organisations were invited to submit comments.</p> <p>There was limited information in the public about this process, which resulted in the fact that only few civil society organisations provided comments.</p>
MAINSTREAMING OF ROMA EQUALITY AND INCLUSION AT THE NATIONAL LEVEL AND CONNECTION WITH OTHER RELEVANT EU INITIATIVES & DIVERSITY CONSIDERATIONS	The vast majority of the measures are Roma-specific ones.	An explicit link with relevant mainstreamed sectoral policy initiatives is often lacking.
FUNDING CONNECTION WITH EU FUNDING PROGRAMMES (instruments)	References are made to past and ongoing EU-funded programmes. The NRCP, who is also the Minister for Human and Minority Rights and Social Dialogue, is involved in IPA programming as her ministry takes part in sector working groups for the programming of IPA funds.	

OTHER SOURCES OF FUNDING	Not included in the strategy itself but in the action plan.	
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PROMISING PRACTICES /APPROACHES FOR COUNTRY-TO-COUNTRY LEARNING
<p>Joint mobile units (JMU) were introduced for the first time in Serbia through an EU-funded support (IPA 2012), as one of the project components. Joint mobile units are comprised of five persons who deal with Roma inclusion at the local level (municipal Roma Co-ordinators, Pedagogical Assistants, Health Mediators and designated individuals in the Centres for Social Work and the National Employment Service). The main goal of the JMU is to assist all Roma in selected local self-governments in their everyday life and work.</p>