



Eurodiaconia's assessment of the EU Roma Strategic Framework for Equality, Inclusion and Participation

Eurodiaconia is a European network of churches and Christian NGOs providing social and healthcare services and advocating social justice.

Mission

Eurodiaconia is a network of churches and Christian organizations that provide social and health care services and advocate for social justice. Together we work for just and transformative social change across Europe, leaving no-one behind.

Vision

Driven by our Christian faith, our vision is of a Europe where each person is valued for their inherent God-given worth and dignity and where our societies guarantee social justice for all people, including the most vulnerable and marginalized.

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About this publication



Eurodiaconia is a network of 52 organisations in 32 countries, founded in the Christian faith and working in the tradition of diaconia. Representing over 30.000 service providers, Eurodiaconia members provide social and healthcare services and promote social justice. Based on the principle to support the most vulnerable of our societies, many of them provide services and run specific projects to empower Roma¹ communities at the local level. They work with autochthonous Roma communities, as well as with Roma who have been moving from Central and Eastern Europe to Western and Northern European countries, hoping for a better life.

The Roma people are the largest ethnic minority in Europe, with about 10 to 12 million Roma living on the continent, out of which approximately 6 million live in the European Union.² Despite living in Europe for hundreds of years, they face particular high levels of discrimination, social exclusion and poverty.³

The Roma are the largest ethnic minority in Europe, with about 10-12 million living on the continent.

¹ Eurodiaconia uses the term “Roma” as umbrella term, as suggested by the Council of Europe. “It refers to Roma, Sinti, Kale and related groups in Europe, including Travellers and the Eastern groups (Dom and Lom), and covers the wide diversity of the groups concerned, including persons who identify themselves as Gypsies.” (Council of Europe (2012), Descriptive glossary of terms relating to Roma issues, Strasbourg).

² European Commission Factsheet - EU Roma strategic framework, October 2020.

https://ec.europa.eu/info/sites/info/files/factsheet_a_new_eu_roma_strategic_framework_en.pdf

³ Fundamental Rights Agency. Second European Union Minorities and Discrimination Survey: Roma – Selected findings, 2016. https://fra.europa.eu/sites/default/files/fra_uploads/fra-2016-eu-minorities-survey-roma-selected-findings_en.pdf

Eurodiaconia has been actively involved in the promotion of Roma inclusion across Europe since 2010. The networks' work is based on its members experience with the provision of social and healthcare services to vulnerable individuals, including Roma, through initiatives ranging from shelters and housing support, empowerment activities, afterschool educational programmes to vocational training and community-building activities.

In 2020, Eurodiaconia held a number of meetings with members and key stakeholders in the European institutions to discuss the new EU Roma Strategic Framework for Equality, Inclusion and Participation 2020-2030 and provide a platform for our members to discuss how they are addressing the challenges that vulnerable Roma are facing on the ground, particularly in the context of the pandemic, and provide input on how to address these challenges.

This paper will provide a brief introduction and assessment of the new EU Roma Strategic Framework for Equality, Inclusion and Participation 2020-2030, particularly as it relates to the main EU targets, and provide recommendations⁴ based on the experience and observations of our members, for the implementation of the framework at the national level.

⁴ Recommendations are based on Eurodiaconia's previous policy and advocacy work on promoting Roma inclusion and on the ground input from Eurodiaconia members.

Assessment on the new EU Roma Strategic Framework for Equality, Inclusion and Participation 2020-2030

The new 2020-2030 EU Roma Strategic Framework for equality, inclusion and participation launched by the European Commission on October 2020 builds upon the EU Framework for National Roma Integration Strategies up to 2020.

While some improvements in the area of education were made under the previous framework, progress on the socio-economic integration of Roma was limited and little changed for Roma in the key areas outlined in the previous framework. Many Roma remain marginalised in European societies and continue to be subject to disproportionate discrimination, antigypsyism, and socio-economic exclusion.⁵

Eurodiaconia therefore welcomes a number of positive developments included in the new EU Roma Strategic Framework. For one, the change in title from “Framework for Roma Integration” to “Framework for Equality, Inclusion and Participation” is significant, as it signals that the responsibility to integrate is no longer on Roma themselves, but rather governments need to ensure that the challenges and hurdles that prevent Roma from exercising their full rights and participating and being included in society are removed.⁶ Another

Roma are subject to disproportionate discrimination, antigypsyism and socio-economic exclusion

⁵ Communication from the commission to the European Parliament and the Council. Report on the evaluation of the EU Framework for National Roma Integration Strategies up to 2020 <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52018DC0785>

⁶ Intervention of the Office of the High commissioner for Human Rights for the launch of the strategic EU Roma Framework for equality, Inclusion and Participation, 12 October 2020. <https://europe.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=2587&LangID=E>

notable change is the introduction of rights-based indicators linked to specific targets, which help track progress - or lack thereof - and support accountability.

And while many of the policy areas linked to equality, inclusion and participation in the new EU Roma Strategic Framework are predominantly the competence of national governments, the EU has a key role to play in policy guidance, monitoring the implementation of national Roma Integration Strategies, coordination policy actions between MS, supporting actions with EU funds and promoting the exchange of practices between member states.⁷



⁷ European Commission Press Release (October 2020). Commission launches new 10-year plan to support Roma in the EU. https://ec.europa.eu/commission/presscorner/detail/en/ip_20_1813

Horizontal Priorities in the new EU Roma Strategic Framework

1. Fighting and preventing antigypsyism and discrimination

The urgent need to step up efforts to tackle antigypsyism and promote Roma equality and inclusion has become even more pressing as a result of the pandemic. According to the Fundamental Rights Agency, 41% of Roma have reported feeling discriminated at work, while looking for work, in healthcare or education, when in contact with administrative authorities or while entering a shop.⁸ Tackling racism and intersectional discrimination against Roma must therefore be central to any EU strategy that seeks to promote the social and economic inclusion and equality of Roma. The new framework acknowledges that without addressing the structural racism against Roma, real change will not happen. Hence the commitment in the new EU Roma Strategic Framework to include the fight against poverty, antigypsyism and genuine Roma participation as horizontal objectives is a welcome step forward.

2. Reducing poverty and exclusion

With over 80% of Roma at risk of poverty and social exclusion⁹, prioritising poverty reduction as a cross-cutting objective, accompanied by concrete targets and associated indicators is a welcome improvement from the previous Roma framework. We welcome the target of reducing the poverty gap and child poverty gap by at least half, but recommend national

⁸ FRA (2016). Op. cit. note 3.

⁹ Communication from the Commission to the European Parliament and the Council, October 2020. *Union of Equality: EU Roma strategic framework for equality, inclusion and participation 2020-2030*. https://ec.europa.eu/info/sites/info/files/eu_roma_strategic_framework_for_equality_inclusion_and_participation_for_2020_-_2030_0.pdf

governments go beyond the minimum target and adjust it to their own baseline poverty rates.

3. Promoting participation through empowerment, cooperation and trust

The emphasis on Roma participation in the EU framework and the vital role that Roma and pro-Roma civil society should play in designing, implementing, monitoring, and evaluating policies that seek to promote the equality and inclusion of Roma is appreciated by Eurodiaconia members. We applaud the framework's emphasis on the continued engagement of NGOs in EU-wide Roma civil society monitoring, on increasing the participation of Roma in local, regional, and national politics, and on ensuring the participation of Roma NGOs in national monitoring committees. This should be accompanied with strong participation targets at the member state level, and genuine participation of Roma civil society in the development, implementation, monitoring and evaluation of National Roma Strategic Frameworks.

Eurodiaconia recommendations for national governments on the horizontal priorities

- Put measures against discrimination at the core of National Roma Strategic Frameworks (NRSF) and mainstream such measures in institutional structures, policies and legislations as well as funding instruments.¹⁰
- Promote awareness-raising activities targeting the public, addressing people's fears and lack of knowledge through education, and strengthen

¹⁰ Alliance against Antigypsyism: Developing measures to combat antigypsyism after 2020: Guidance for European and national stakeholders, 2019.

https://ec.europa.eu/info/sites/info/files/2019_05_31_antigypsyism-recommendations_0.pdf

anti-discrimination legislation by making it enforceable through effective sanction mechanisms;

- Promote knowledge about Roma culture through conferences, exhibitions, campaigns and in schools. Increase public awareness of the systematic segregation, discrimination and persecution which Roma have experienced in the past, and continue to experience in the present;
- At local and national levels, state employees, such as law enforcement officers and teachers, should be educated to identify and prevent antigypsyism.¹¹ Awareness raising campaigns and/or social media campaigns should be promoted as promising examples. They can be related to national events, such as Roma prayer days, conferences or the Holocaust Memorial Day.
- Increase direct Roma participation in policy-making and public discourse through effective involvement in National Roma Platforms and on all other relevant levels;
- Roma communities and (pro-) Roma civil society organizations should be involved in the design, implementation, monitoring and evaluation of National Roma Strategic frameworks;
- To lower the threshold for Roma accessing services and to contribute to mutual trust, national governments should invest in capacity building for local staff in NGOs and governmental departments dealing directly with Roma and increase the number of Roma working in (public) social and legal counselling services;
- Mainstream a gender perspective in all priority areas in the EU Framework and in the implementation of the National Roma Strategic

¹¹ Ibid.

Frameworks to ensure that particular attention is given to Roma women and girls in all policy areas;

- Ensure that EU funding is available for targeted measures aiming at empowering Roma women and girls;
- Ensure that the challenges and risks experienced by Roma communities as a result of Covid-19 are adequately addressed, and as ERGO has indicated, ensure that Roma are effectively mainstreamed and included in the social and economic policies that will be used to address the impact of the pandemic.¹²

Sectoral priorities in the EU Roma Strategic Framework: Employment, Education, Housing and Health

Employment

With 62 % of Roma youth neither in education, employment nor training, only 43% of Roma aged 20-64 in paid work, and a gender employment gap of 27 percentage points (pps), compared to 11.7 pps gap in the general population¹³, making effective equal access to quality and sustainable employment as a sectoral priority in the EU Framework is necessary and welcomed. We applaud the minimum target of at least 60 % of Roma in employment by 2030, but would agree with other EU civil society partners

¹² ERGO, December 2020. Recommendations for the national strategic frameworks under the new EU Roma strategic Framework for Equality, Inclusion and Participation. <https://ergonetwork.org/wp-content/uploads/2020/12/Guidelines-to-Member-States-NRFs-2020.pdf>

¹³ Communication from the Commission to the European Parliament and the Council, October 2020. A Union of Equality: EU Roma strategic framework for equality, inclusion and participation 2020-2030. Op. cit note 9.

that the target for Roma women in employment should be the same as that of Roma men.¹⁴

Education

Eurodiaconia also welcomes the focus on education, health, and housing as sectoral priorities with accompanying targets and indicators to measure progress, but believes the framework could be more ambitious with regards to specific targets. For example, as the ERGO Network has pointed out, the proposed target of reducing the gap in upper-secondary school completion by only 1/3 is not sufficient. And allowing the continuing practice of segregation of Roma children in schools, *decreasing* by only a half the proportion of Roma children attending segregated primary schools goes against EU law, as segregation is considered racial discrimination according to the Committee on the Elimination of Racial Discrimination.¹⁵

Housing

The targets related to housing, including ensuring that at least 95% of Roma have access to tap water, cutting the gap in overcrowding between the Roma and the general population by at least 1/2 (it currently is 78% versus 17.1% for the general population)¹⁶ and reducing the gap in housing deprivation by at least 1/3 are all good targets and a positive step in seeking to address some of the persistent challenges that Roma face with regards to housing. However, housing segregation and forced evictions remain major challenges for Roma. Many of them live in poor housing conditions in segregated areas, lacking sometimes running water, sanitation systems and electricity which can heavily im-pact health conditions. In addition, segregated areas have often poor access to public services, employment

¹⁴ ERGO, December 2020. Op. cit. note 12

¹⁵ Ibid.

¹⁶ Communication from the Commission to the European Parliament and the Council, October 2020. *A Union of Equality: EU Roma strategic framework for equality, inclusion and participation 2020-2030*. Op. cit. note 9.

and schools. Strong measures addressing forced evictions and housing segregation should therefore be included in National Roma strategic Frameworks.

Health

Eurodiaconia members very much welcome the sectoral objective to improve Roma health and increase effective equal access to quality healthcare and social services. We applaud the target to decrease the gap in life expectancy between Roma and non-Roma by at least a half - which currently is very high at 10 years - but would have liked to see additional targets developed for access to social and healthcare services.

Our members experience in the provision of social and healthcare services to vulnerable individuals, including Roma, has given them a unique insight into the challenges and gaps that Roma face in accessing services. Poverty and poor levels of accommodation, often characterized by a lack of access to electricity, water, heating and healthy food have led to high levels of communicable diseases, malnutrition, and undernourishment in a significant portion of the Roma population. Additionally, Roma face discrimination in the provision of health services in many EU countries.¹⁷

As many vulnerable groups among Roma are not covered by health insurance, they frequently face difficulties accessing basic health care, and often can only access emergency health care services. Inaccessibility is due to a series of reasons, including lack of identification documents, language barriers, lack of financial means, and lack of health awareness and information about their rights. Indeed, in certain areas many vulnerable Roma have never been to a doctor and lack basic health knowledge. Furthermore, for those groups of vulnerable Roma living in isolated rural areas or camps in the outskirts of cities with limited public transport

¹⁷ Eurodiaconia, [Promoting Roma Inclusion](#), Policy Paper, February 2018.

facilities, accessing health care centres or professionals is often a challenge.¹⁸

Eurodiaconia recommendations for national governments on the sectoral priorities

To improve access to the labour market and employment of Roma Eurodiaconia recommends that national governments:

- Make use of EU initiatives, such as the Youth Guarantee and EU Skills Agenda, in a way that allows to combine mainstream support with specific support measures for Roma;
- Provide 'second chance' education for adults who haven't completed compulsory education and promote vocational training schemes which correspond to labour market needs and lead to employment, including in social enterprises and self-employment;
- Increase the capacity of employment services of offering individualized career orientation, skills development and employment support, and provide training to fight discrimination of Roma;
- Encourage employers to engage Roma and other vulnerable groups, and tackle discrimination in the workplace. Promote mentoring programmes and create space for positive role models;
- Link employment and housing support more closely to allow finding solutions for individual cases, as many Roma live in areas removed from potential workplaces and lack the means to commute;

¹⁸ Ibid.

- Allow EU mobile Roma to access upskilling and basic training programs, which would improve their employability and develop procedures to recognize the informal skills of EU mobile citizens, which would highly benefit EU mobile Roma.

To further improve Roma education, Eurodiaconia recommends that EU and national governments:

- Promote and provide funding for inclusive schools and inclusive recreational activities. Capacity building among teachers should be promoted. Teaching diversity and Roma culture in schools and after school activities are important steps to improve educational outcomes of Roma children;
- Provide for sufficient and affordable early childcare in areas with high Roma populations, in order to enable young Roma mothers to complete their education, including secondary and higher education, and enter the labour market;
- Make virtual learning accessible to Romani children during the pandemic by ensuring that they have access to electricity and an internet connection, a computer, alternative e-learning experiences, and the necessary educational support so that they are not left behind¹⁹;
- EU institutions and national governments should increase efforts to provide access to education and training as well as labour market integration support for adult Roma.

¹⁹ Romani Early Years Network (2020). Priority actions for decision maker in Europe: a call on behalf of young Romani and traveller children living on the margins. <https://reyn.eu/wp-content/uploads/2020/05/REYN-Call-for-Action-COVID-19.pdf>

To improve access to housing and housing conditions of Roma, Eurodiaconia recommends that EU and national governments:

- Ensure that EU funds are used to support desegregation and investment in affordable housing, which also benefits Roma communities;
- Provide for sufficient and adequate social housing and review legal frameworks on access to social housing to reduce administrative barriers and simplify the access for vulnerable and marginalized persons;
- Promote an individualised and participative approach to housing which is involving the concerned Roma, considering and offering different housing models, including the upscaling of existing housing, while avoiding segregated housing solutions;
- Improve multi-sectoral stakeholder coordination in the area of housing, involving local authorities, housing cooperatives, Roma communities and NGOs;
- Counteract discrimination regarding access to housing for Roma by introducing and implementing functioning complaint mechanisms and sanctions, as well as adopting a preventive approach to eviction.

To improve Roma access to healthcare, Eurodiaconia recommends that EU and national governments:

- Explicitly include targeted measures to improve access to health for Roma in the framework of EU health policies;
- Ensure EU funding is used to improve access to healthcare for Roma and that Roma have access to health insurance, testing and vaccinations;

- Support NGOs to provide information services on social and health rights and to run programmes which promote health awareness as well as out-reach health initiatives;
- Continue to invest in training more Roma health mediators to facilitate communication between healthcare providers and Roma communities and inform Roma about hygiene and health;
- Raise health awareness through school education, starting at early childhood education and including outreach to parents;
- Train social and health care practitioners in cultural awareness to fight discrimination of Roma and other marginalized groups in health services.



Supporting EU mobile Roma

The evaluation of the previous EU framework concluded that the multiple identities among Roma were not sufficiently addressed. EU mobile Roma, for example, tend to face specific barriers and discrimination when accessing social rights. Their situation is sometimes exacerbated by the fact that neither host countries nor countries of origin tend to take responsibility for this specific group.

Many of the challenges which EU mobile Roma face are similar to those faced by other EU mobile citizens. However, their heightened vulnerability — related to poverty and anti-gypsyism confronted over generations — accentuates the difficulties they face and puts them at a higher risk of experiencing worse forms of destitution, while making it more challenging to overcome the situation.

According to Eurodiaconia members who work closely with this vulnerable group, the challenges met by EU mobile and migrant Roma relate to difficulties in accessing social rights due to various reasons (such as lack of knowledge, mistrust in institutions, discrimination when dealing with authorities). In addition, mobile Roma face difficulties in the registration process and – sometimes as a consequence – obstacles in finding employment and being the beneficiaries of respective services. Furthermore, mobile and migrant Roma are often at a high risk of housing exclusion.

Eurodiaconia is glad to see that the new EU Roma Strategic Framework recognizes the disadvantaged position of EU mobile Roma as a common interest to member states. Host countries should be made accountable for their obligations towards the rights of mobile EU citizens. Exchange between host countries and countries of origin should be further supported.

With regards to EU mobile Roma Eurodiaconia also recommends:

- The EU should take a clear stand on the rights of Roma who migrate within the EU. National Roma Strategic Frameworks should target this group by providing local actors with capacities to inform about access to social services and provide them with legal advice;
- Social services should be set up by municipalities in cooperation with NGOs to support EU mobile citizens in accessing their social rights. The services should include outreach to vulnerable EU mobile Roma, information about their rights and support for EU mobile Roma in accessing those rights related to education, employment, health and housing. Among the possible measures, low threshold activities would be particularly well suited to provide information, build trust and to empower the target group.
- Member states should be encouraged to facilitate registration processes for EU mobile Roma and to promote housing solutions, as this group is particularly affected by homelessness.
- Member states should protect migrating Roma more effectively from exploitation, for example by introducing a firewall between processes of detection and apprehension and access to services;
- While homelessness experienced by EU mobile Roma is not addressed in the new EU Roma Framework, it is of great relevance for tackling their exclusion. Particular focus and resources should be given to organisations that provide homelessness services to Roma and are crucial in meeting the most basic needs of the homeless.
- EU funds, such as the ESF+ should provide targeted support to EU mobile citizens and EU mobile Roma in particular, in order to avoid that they end up destitute. National Roma Strategic Frameworks should incorporate specific goals, budgeting and follow-up mechanisms to

address EU mobile Roma. To better support the capacities of civil society organisations working with EU mobile Roma on the ground, EU funding should also be made directly accessible to grassroots organisations.

Creating synergies with relevant EU policies and initiatives

We support the European Commission's endeavour to create synergies between the new EU Roma Strategic Framework and other EU initiatives, such as the European Pillar of Social Rights (EPSR), the EU Anti-Racism Action Plan, and the Sustainable Development Goals (SDGs). However, as the ERGO network points out, the targets set out in the EU Roma framework do not make many direct links to the principles set out in the EPSR and the framework does not state that the EPSR and the SDGs will also support the implementation of the EU Roma framework in a mutually reinforcing way.²⁰ In addition the framework does not make any clear links to the EU Child Guarantee and the upcoming EU strategy on the Rights of the Child.

The EU Roma framework also does not mention how it will be aligned with the European Semester and the Recovery and Resilience Facility. Eurodiaconia and its members therefore call on the European Commission to make use of the European Semester, the upcoming Action Plan on the European Pillar of Social Rights, and the upcoming EU Strategy on the Rights of the Child to increase the impetus on member states to support Roma equality, inclusion and participation in all areas and to urge member states to include Roma in its National Recovery and Resilience plans.

²⁰ ERGO, December 2020. Op. cit. note 12



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