



Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in France

Prepared by:
La Voix des Roms
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LIST OF ABBREVIATIONS

ASEFRR	Romanian and Roma Families Solidarity of Esson Association (<i>Association Solidarité Essonne Familles Roumaines et Rroms</i>)
AGP	<i>Action Grand Passage</i> (association)
AME	State Medical Aid (<i>Aide Médicale de l'État</i>)
ARS	Regional Health Agency (<i>Agence Régionale de Santé</i>)
ASNIT	National International Gypsy Social Association (<i>Association Sociale Nationale Internationale Tzigane</i>)
ASP	Occupational Security Allowance (<i>Allocation de Sécurisation Professionnelle</i>)
CAF	Family Benefits Fund
CNED	National Centre for Distance Learning (<i>Centre National d'Enseignement à Distance</i>)
CEU	Central European University
CNCGV	National Consultative Commission for <i>Gens de Voyage</i> (<i>Commission Nationale Consultative des Gens du Voyage</i>)
COVID-19	Coronavirus Disease 2019
CPAM	Primary Health Insurance Fund (<i>Caisse Primaire d'Assurance Maladie</i>)
CREIC	Universal Health Coverage Center for Inactive European Citizens (<i>Centre des Ressortissants Européens Inactifs CMUistes</i>)
DIHAL	Interministerial Delegation for Accommodation and Access to Housing (<i>Délégation Interministérielle à l'Hébergement et à l'Accès au Logement</i>)
DILRCRAH	Interministerial Delegation for the Fight against Racism, Antisemitism and anti-LGBT Hatred (<i>Délégation Interministérielle à la Lutte Contre le Racisme, l'Antisémitisme et la Haine anti-LGBT</i>)
EC	European Commission
EU	European Union
LGBTIQ+	Lesbian, Gay, Bisexual, Transgendered, Intersex, Queer and Questioning
NGO	Non-Governmental Organisation
NRCP	National Roma Contact Point
NRSF	National Roma Strategic Framework
ODCI	Observatory for the Rights of Itinerant Citizens (<i>Observatoire des Droits des Citoyens Itinérants</i>)
SAS	Health Care Access Services (<i>Services Accès aux Soins</i>)
SIBEL	Inclusive Exit from the Slum through Employment and Housing (<i>Sortie Inclusive du Bidonville par l'Emploi et le Logement</i>)

EXECUTIVE SUMMARY

For the first time, the French government has succeeded in creating a national strategy that complies with both French national interests as well as the requests of the European Commission. It has used inputs from Roma civil society. No official evaluation of the previous strategy has taken place that could have provided more specific guidance regarding lessons learned. Despite this, noticeable improvements have taken place. Within the new National Roma Strategic Framework (NRSF), the former approach of emphasising national security, forced evictions, and the destruction of slums, which affects migrant Roma from Romania and Bulgaria, has been replaced with one that focuses on social inclusion. Unfortunately, we cannot say the same regarding the *Gens du Voyage*,¹ in relation to whom national security concerns seem to remain an obstruction with respect to enforcing the law on stopping places.

It remains to be seen how this NRSF will further be specified, measured, and lived. The potential for significant improvements is recognised as a result of the process that has thus far taken place. The potential for positive change resides in the combination of two principal points: the priority given to the fight against antigypsyism and the nature of the strategy as a soft law text. If this is accompanied by a renewed will to use the NRSF in an innovative and efficient way, we can say it holds great promise. The National Roma Contact Point (NRCP) and other government authorities will need to demonstrate this through their actions in order to reverse the pessimistic view currently held by much of civil society.

Participation

The strength and capacity of civil society in general in France is relatively weak. Roma civil society is even weaker. The French NRCP welcomed the participation of civil society in the process of the elaboration of the NRSF and has taken significant steps forward in recognising this need. It has reached out via open calls to seek contributions, and it has incorporated recommendations of civil society partners into the strategy. This needs to be encouraged and continued as a general approach. Where specific recommendations on process improvements have been provided, political will and resources need to follow through from government authorities in order to maintain and encourage further engagement from civil society as relevant partners. Concrete policy outcomes should continue to be defined by the NRCP as well as the measures for evaluating success.

Relevance

Education, employment, healthcare, housing, child protection as a part of access to basic rights and social services in a universal mainstream approach make up the majority of the focus of the NRSF as a continuation of past policies. Although such an approach leaves little room for aspects of language, history, and culture, the latter are nevertheless addressed in the NRSF. Whether the strategy has impact in these main sectors depends on implementation mechanisms that have not yet been sufficiently specified and will need further development in action plans, whether for the whole strategy, per sector, or regionally.

What is encouraging and provides hope is the identification of antigypsyism and the political will to address it. The long-term success of the goals of the other objectives mentioned in the strategy and the success of public policies targeting Roma populations will depend on the efforts that maintain combating antigypsyism as a priority.

¹ *Gens du Voyage* is a French legal administrative term used to refer to itinerant people. It is not fully synonymous with 'Traveller', as often used in the UK.

Expected effectiveness

It is difficult at present to provide a judgement as to the potential success of the NRSF when much of it fails to identify specific measures and policy outcomes. Timelines, milestones, and indicators are not always clearly identified. Specific measures on how to address the problems that are well identified in the NRSF are missing. This report provides several examples from civil society of how existing measures do not adequately respond to the needs of the target groups in the areas of education, employment, and healthcare. Where such problems have been identified and persist, more specific remediation actions could have been proposed. From a high-level perspective, the critical problems have been correctly identified in the NRSF. In some cases, research is proposed and rightly so. The follow up will rightly depend on the outcome of that research. How the training programs are designed and implemented will ultimately determine the success of the first objective of fighting antigypsyism. Even though we agree that this target is most relevant and holds the most potential for creating success, without more detail concerning the resources that will be put behind it, the probability of success cannot be estimated.

Alignment with the EU Roma strategic framework

The EU Roma strategic framework is primarily a social policy, and it goes further by including participation and equality. As such, the mainstream universal approach taken by the French authorities is the first step toward creating the preconditions necessary for achieving success. While the approach may be criticised as not being 'Roma specific,' it is precisely for this reason that it will be able to be taken seriously in the French context, which does not recognise any national minorities. Furthermore, as an element of social policy intended to make special effort to reach previously neglected populations, it is aligned with the objectives of the EU framework as a social policy.

Naming antigypsyism as a specific objective demonstrates a willingness to address the roots of the problem and also helps create the preconditions for the success of policies that in fact target the most visible victims of antigypsyism.

INTRODUCTION

National Roma strategic framework

The French NRSF for 2020-2030, *'La Stratégie française 2020-2030 en réponse à la recommandation du Conseil de l'Union européenne du 12 mars 2021 pour l'égalité, l'inclusion et la participation des Roms'* [The French Strategy 2020-2030 in response to the Council of the European Union Recommendation of 12 March 2021 for Roma equality, inclusion and participation], is a new strategy that demonstrates a twofold evolution:

- First of all, it is a formal document, new, and based on rigorous analytical work when compared to the previous period. Formerly, the government's position used to be ambiguous, varying between the text of the strategy named 'An equal place in the French society', communicated to the European Commission in 2011,² and the inter-ministerial circular adopted in 2012 on shantytowns.³
- Second, the new government's position compared to the previous strategy takes into consideration the contribution of Roma civil society. The primary evidence of that is the establishment of antigypsyism as the first of three major strategic objectives of the NRSF. A key milestone is taking place as this report is being drafted: a planned national conference on antigypsyism in June 2022. This holds great promise, subject to the mitigation of certain implementation risks.

The second and third objectives represent a somewhat improved continuation of the old approach within the constraints of French constitutional law that does not recognise any specific national minority and attempts to deal with the extreme diversity of the Roma populations of France by addressing issues such as access to basic rights including housing, education, and healthcare for all.

These inclusion goals roughly target two main groups of people: shantytown/slum dwellers and the people classified as Gens du Voyage. This first category is intended to primarily cover the migrant Roma population in France coming mostly from Romania and Bulgaria. The second category is not an ethnic category but rather an administrative category referring to people registered as itinerant without reference to any ethnicity. It does, however, despite this intention, roughly capture many people who self-identify in categories such as Manouche, Sinto, Yeniche, and others which are perceived and stigmatised as 'gypsies'. The Roma who do not fall into one of these two categories are not covered by the NRSF.

The NRSF was published on the government's website at the beginning of 2022,⁴ and two presentations were done by the NRCP in the two meetings, one of the 'National Commission for the follow-up of Shanties' Clearance' and second of the 'National Consultative Commission for Gens de Voyage'. As it is an inter-ministerial strategy, the text did not need to go to parliament. Consultations with civil society took place during the summer of 2021.

About this report

This data was collected from five interviews with representatives of Roma and pro-Roma civil society NGOs, and one interview with the NRCP. The interview questions discussed

² The text communicated to the European Commission can be found at: <https://www.angvc.fr/wp-content/uploads/2016/09/UE-20120201-Rapport-France-sur-strategie.pdf>

³ The inter-ministerial circular can be found at:
https://juridique.defenseurdesdroits.fr/index.php?vI=notice_display&id=6988

⁴ The French NRSF can be found at: https://www.gouvernement.fr/sites/default/files/contenu/piece-joindre/2022/03/strategie_francaise_2020-2030_.pdf

followed the recommended guidelines provided by CEU. This report was compiled by the association by La Voix des Rroms, including some members of the National Collective Romeurope, also using analyses and contributions from other associations.

1. PARTICIPATION

1.1. Roma participation in the NRSF preparation

In order to instigate Roma participation in the preparation of the NRSF, the French NRCP published an open call asking for contributions and participants. Those written contributions submitted by NGOs and individuals were then published on the website of the NRCP and were discussed in an open consultative event between the NRCP and the Roma NGOs who responded to the open call. To our knowledge, only one attended the hearing, and that was La Voix des Rroms, and there was no exclusion of any potential participant that showed an interest. On behalf of the Gens du Voyage, the National International Gypsy Social Association (*Association Sociale Nationale Internationale Tzigane*, ASNIT) and *Action Grand Passage* (AGP) submitted a common written contribution, as also did pro-Roma organisations.

In its written contribution as well as during the hearing, La Voix des Rroms presented its main recommendation for the NRSF: the need to thoroughly address antigypsyism, starting with creating awareness of the phenomenon, to creating training on antigypsyism, and an implementation plan targeting government institutions, their employees, and eventually the general public. While this suggestion was well received and is currently addressed as the NRCP's first objective in the NRSF, the indispensable training of trainers is not explicitly included and is envisaged to take place during the implementation of the strategy.

The impact of NGOs representing the Gens du Voyage on the agenda and decisions of the National Consultative Commission for Gens de Voyage (*Commission Nationale Consultative des Gens du Voyage*, CNCGV) is extremely limited and marginalised by the governmental agenda and policies. The same can be said of the commissions at the level of departments. Although called upon to contribute to the NRSF, only the contributions of the members of the CNCGV were taken into consideration (they are included as an annex to the Strategy). An extensive report with proposals for the strategy by the NGO *Observatoire des Droits des Citoyens Itinérants* (Observatory for the Rights of Itinerant Citizens, ODCI), which is not a member of the commission, was communicated to the president of the CNCGV and supported by ASNIT but was either never shared with the members of the commission, or it appears not to have been taken into consideration. The propositions submitted by the members of the commission were only partially included in the strategy. The propositions challenging systemic discrimination against a nomadic way of life were rejected. After the first contribution, NGOs were no longer associated with the process of elaboration of the strategy until its final version.

Given that the scope of the NRSF has until now primarily focused on two target beneficiary groups, people inhabiting shanties and Gens du Voyage, Roma not fitting into these two categories may not feel sufficiently concerned or motivated to participate in any such plan. It is precisely those who are not covered in this NRSF who are most relevant with respect to achieving the goal of visible civil society participation, most notably the Roma middle classes who pass for assimilated members of French society. This group could be interested in participating in issues of discrimination separately from social inclusion. It has the economic and intellectual capacity to do so. They are Roma, but their socioeconomic status does not fit the definition of socially excluded peoples, and therefore they are not the target of the French NRSF.

As such, the French NRSF does not distinguish between exclusion and discrimination, nor does it take into consideration that Roma exist beyond those who are visibly socially excluded. Moreover, French national ideology views self-sustaining ethnic communities as

negative⁵ and does not encourage ethnic community solutions to replace or even complement the mainstream approach. Indeed, any such complement would be perceived as an unacceptable compromise to the universalist approach the state takes in such instances according to current and traditional interpretations of the French constitution. It makes sense that they would not include them in the French NRSF, given the social criteria specified by the EC. Social inclusion is the state's responsibility – that is to say, it is not the responsibility of Roma or of civil society to build the capacity to solve these problems.

Regardless, Roma middle classes have demonstrated a tendency to maintain their distance from Roma in precarious economic circumstances out of a desire for self-preservation, in order to avoid the stigma of being racialised as part of a community that suffers discrimination and social exclusion.

Ironically, the French NRSF's approach, which deliberately tries to avoid references to any ethnicity by addressing socioeconomic concerns in addition to access to basic rights, is fully aligned with the implied aspects of the European Commission's approach, which heavily emphasise social policy and apply it to an ethnic category. Unfortunately, this results in creating confusion regarding the difference between ethnicity and socioeconomic class as far as Roma are concerned.

In fact, obtaining the willing participation of 'invisible' (i.e., socially assimilated middle-class) members of Roma communities would require assurances about their continued safety with respect to both personal immaterial security and economic well-being as they are experiencing it now, 'in the closet'. The threats of losing their jobs, damage to their personal property, and physical violence are also directly related to the prevalence of antigypsyism. Addressing antigypsyism thoroughly could lead to the mobilisation of these valuable resources, not just for the Roma emancipation movement but for French society as a whole. Current perceptions do not equate Roma with actively participating citizens and this aspect of antigypsyism can be seen as an influencing presumption in the NRSF.

Among other civil society organisations that were invited but did not participate were Amnesty International and *SOS Racisme*.

1.2. Roma participation in the NRSF implementation, monitoring, and evaluation

Cooperation and participation with Roma NGOs is expected to go on once the implementation of the NRCP starts; however, these consultations mostly tackle the design and content of policy measures but not their actual roll-out, the implementation at street level. The implementation of a public policy is the role of the government, and the government must allocate the resources. In any way, in its current state, Roma civil society does not have the capacity to perform implementation actions.

We are unaware of any other monitoring or evaluation of the NRSF other than this report and others like it sponsored by the Roma Civil Monitor project. Also, with respect to the measures that may be used to evaluate success, Roma civil society in France does not have the capacity to independently deploy monitoring and evaluation processes. It is the view of *La Voix des Rroms* that it is the responsibility and duty of the government to dedicate the budget and the resources necessary to perform the work of measuring whether it has achieved its targets. Roma civil society as it exists now can at most provide advice and perform an audit of a limited sample size of recurrent processes. However, this has brought to a very limited number of people extremely valuable expertise on

⁵ This is known in French as *communautarisme*.

antigypsyism that needs to be valorised, shared, and spread all over the public sphere in order to ensure the efficiency of the inclusion policies and actions.

The lack of a well-developed Roma civil society in France remains a major hindrance to achieving more Roma participation. As long as any group of people continues to be perceived as 'gypsies', that is to say, perceived as outside of the norms of accepted societal expectations, then attempting to include them will be a futile exercise. The ideological construct and its stereotypes must be exposed before any Roma can be understood as a people with their own history and culture independent of the perceptions created by othering. The French constitution prevents both the discrimination and the favouring of any community group over another, which also makes it officially impossible to know whether any Roma are employed by the NRCP. However, to our knowledge, such a presence would be noticeable if it were there. All of these can be considered hindrances to capacity building.

1.3. System of policy consultation with civil society and stakeholders

With respect to any system of consultation to ensure the inclusion of various segments of the Roma population too, we find the same limits of the two categories covered in the NRSF: there exists a 'National Consultative Commission for Gens du Voyage'⁶ and a 'National Commission for the follow-up of Shanties' Clearance'. While the first brings together four categories of members, including representatives of the Gens du Voyage appointed by the Prime Minister and is consulted – more or less efficiently – for advice in decision-making processes, the second is rather a platform which brings together civil society organisations, voluntary local authorities and independent bodies involved or interested in the topic of shanties' clearance. Both are led by the NRCP.

The NRCP understands the need and encourages input from civil society partners. It recognises this need, but it is not in a position to undertake the capacity building needed to ensure it has solid partners in the short term. Continued cooperation with its existing partners can help fulfil this need partially over the long term by continuing to solicit input via open calls and public consultations. For this 2020-2030 NRSF, it has planned well in advance and provided sufficient time to collect responses and incorporate input from willing participants. There is not yet any regular schedule of planned open calls or consultations for the future that is currently visible. This could be further developed as part of the implementation plan and may be worth considering.

1.4. Empowerment of Roma communities at the local level

There is a great weakness of Roma civil society, which can be seen in the lack of cohesion between the different Roma groups present on the territory of France for generations, the lack of knowledge among the general population of who those people are, and the inability of the government to legally target them within the framework of the French constitution as it is currently interpreted. Therefore, the NRSF cannot be perceived to directly empower Roma communities that have not been directly targeted by the NRSF. Indirectly however, if the fight against antigypsyism is not limited to targeting people solely based on their social status, one can expect that some among the numerous Roma out of scope could become mobilised and empowered to improve the participation of the community in public life.

1.5. Capacity-building of Roma civil society

The NRSF does specifically target the promotion of civil society cooperation and strengthening of citizen participation for both of the target groups mentioned in the plan.

⁶ <https://www.culture.gouv.fr/Thematiques/Developpement-culturel/Le-developpement-culturel-en-France/Culture-et-Solidarite/Gens-du-voyage/Actualites-Gens-du-voyage/Commission-nationale-consultative-des-Gens-du-voyage-CNCGDV>

It also mentions the areas of culture and collective memory for the Gens du Voyage. These two topics seem clearly to build on past initiatives that have succeeded with social insertion. While those initiatives – like the Charter ‘Culture – travellers and gypsies of France’ and various commemorations related to the internment of nomads during WWII – should be welcomed and supported, it seems necessary to enlarge the scope and support, including by sparking new initiatives, especially from the young generation and women.

For the inhabitants of shanties, the second group, significant emphasis is placed on developing citizenship participation. If, however, the part of the strategy that deals with offering them appropriate permanent housing solutions is successful, they will no longer fall into the target group, as they will have escaped the vicious circle of poverty of living in an illegal squat or shanty town. It is ironic to try to develop long-term citizen participation with a group that will be eliminated if the policy is successful, i.e., no longer in poverty. The NRSF explicitly mentions that it will address the ongoing need for citizen participation of people living in abject poverty, while at the same time trying to eliminate the condition of poverty. This responds to the demands of the EC; however, it is not logical as a policy goal.

Although the strategy does mention the possibility of including some people who formerly lived in such conditions being supported as members of such a strengthened Roma civil society, volunteering their time for others in poverty when they have just barely escaped it is perhaps not that attractive a proposition for people who wish to remain outside of a poverty that is perceived as inherent to their identity. It almost establishes a permanent poverty class label for those who should continue in such roles. In some cases where this has actually happened, it was limited to participation in some consultative bodies called ‘social life councils’ which discuss the concrete issues of the beneficiaries of inclusion projects. Even there, this participation was very superficial and neither the representatives nor their beneficiary fellows were prepared or accompanied so that the mechanism of representation/participation could work.

2. RELEVANCE

2.1. Fighting antigypsyism and discrimination

Although the legal framework for fighting hate speech and discrimination is well developed in France, it remains difficult to prove discrimination in many instances globally. As specific types of discrimination are identified and then treated with changes to laws, they become more effective when budgets are allocated for raising awareness and training. For example, evidence of this can be seen with larger numbers of cases being reported and pursued in court for discrimination against LGBTIQ+ people. As a result, awareness building and positive outcomes achieved in obtaining recourse against perpetrators of these crimes encourages others to come forward. France faces significant problems in fighting antigypsyism. Overt racism towards Roma and people perceived as 'gypsies' not only remain socially acceptable, but in instances where such discrimination can be easily proved, public officials have proven unwilling to enforce existing laws which could deal with the issues more than sufficiently.⁷ The latter instance shows the lack of awareness of what antigypsyism is and correlates with how universally present it seems to be, since law enforcement authorities too can perceive antigypsyist speech as not being contrary to law.

By naming antigypsyism specifically and addressing it as the first of three major objectives, the NRSF has taken a significant step forward in this new decade. The previous decade did not have a formal strategy clearly and unanimously identified. The government's position used to be ambiguous, varying between the text of the strategy named 'An equal place in the French society', communicated to the European Commission in 2011, and the inter-ministerial circular adopted in 2012 on shantytowns. This time, they have performed some rigorous research and set forth important guiding principles. In this new decade, there is also a new government that has actually taken a position compared to the previous strategy, which is taking into consideration the contribution of civil society. The establishment of antigypsyism as the first of three major strategic objectives of the NRSF is a direct result of Roma civil society input. A key milestone took place as this report was being drafted: a planned national conference on antigypsyism on 28 June 2022. This holds great promise, subject to the mitigation of certain implementation risks. Antigypsyism has not been officially recognised by any government institution before, and it is hardly known as a concept. There is even resistance among some to addressing a specific form of racism/discrimination rather than dealing with it under general/universal policies, although the first step has been taken.

Antigypsyism is the most relevant issue facing Roma in France today. Without addressing it, there can be no understanding of who the Roma are and how the diversity of Roma goes beyond those two groups named in the NRSF in order to be able to address their needs in the future. The difficulty that presents itself will be the details (e.g., the content of the training planned in the strategy for public officials and overall, the training of the trainers which is not mentioned in the strategy and on which will depend the success of such training of public officials) and the resources devoted to this, as well as the enforcement of consequences in cases where antigypsyism is proven in the future. Much of that will depend on how the execution of the plan manages to be implemented in a transversal manner, rather than in a silo, where its effects will not have a chance to take root. Approximately 16 actions are planned, all with strong language that shows a

⁷ For instance, although a complaint was filed by La voix des Rroms with the public prosecutor's office following incidents of hate speech and a series of physical attacks in spring 2019, none of the perpetrators of the calls for violence was sued. Similarly, none of the dozen reported incidents submitted to PHAROS, a specialised police service on hate speech, received any response. This has also happened with respect to Roma trying to file complaints regarding damage and theft of personal property, for whom the police illegally refused to register the complaint because it occurred on private land "without right or title". Also, banks often demand additional documents that are not normally required to open a bank account, such as a payslip.

willingness to take tough measures; however, the details regarding how to ensure the implementation of those measures remains vague and indicators for defining their success have not yet been defined regarding the first objective to fight antigypsyism. Furthermore, the second and third objectives of the NRSF dealing with the improvement of living conditions for the Gens du Voyage and the people currently living in shanties do not mention antigypsyism at all either in the plan summary or in their proposed evaluation measures. This may reflect the current lack of understanding within the NRCP regarding the transversal nature of how antigypsyism functions, or evidence that the plan needs further resources to be further developed. It will be important to demonstrate to the NRCP's partners how the combating of this phenomenon must be implemented in a transversal way in order to be effective.

To illustrate the point further, with respect to Gens du Voyage, the measures presented are mainly those already in place. They are insufficient for guaranteeing the rights of nomadic/semi-nomadic families. In no way does the NRSF challenge systemic anti-nomadism, which increasingly threatens itinerant ways of life and cultures in France. The only form of racism taken into consideration is individual acts of racism. Systemic racism is not closely examined with respect to anti-nomadism. This includes urban regulations, the "*Loi Besson*"⁸ (the law concerning all territory prohibited to mobile accommodation: Gens du Voyage are obliged to stay on inadequate stopping sites,⁹ most often built-in locations unsuitable for living), and repressive legislation which has criminalised the nomadic way of life.¹⁰ Mainstream legislation and administrative regulations (*le droit commun*) are appropriate for settled populations but are not adapted to nomadic and semi-nomadic ways of life, and hence entail indirect discrimination.

2.2. Education

France faces significant problems with antigypsyism as it affects access to education for Roma, in particular by members of those two groups who are addressed directly in the second and third objectives of the NRSF. As far as access to continuous schooling (this includes pre-school, primary and secondary education) being a problem is concerned, the NRSF recognises this problem and does address it by listing the current legal framework that exists and explains how it should be sufficient to provide remedies. The approach focuses on how to better apply the existing framework so that it succeeds in addressing exactly what has in reality remained unaddressed.

While current laws require all children to attend school regardless of citizenship, the acceptance of minors into school districts where they may not be perceived as legitimate residents by local authorities has often been prevented. The reluctance of local authorities to register children for school, which is a violation of the law, is not often met with swift responses from national authorities who could enforce the application of current laws to ensure non-discrimination. For example, when a mayor refuses the inscription of a minor at school, the prefect can override this decision, because according to national law all children, regardless of their citizenship, are required to attend school in France. The prefect is an extension of the national government who can override local government authorities

⁸ Loi n° 2000-614 du 5 juillet 2000 relative à l'accueil et à l'habitat des gens du voyage, <https://www.legifrance.gouv.fr/loda/id/JORFTEXT000000583573/>.

⁹ An interactive map of all the French reception areas (about 1,400 sites) is available at the following address: [https://visionscarto.net/aires-d'accueil-les-donnees#:~:text=Nombre%20d'aires%20s%C3%A9lectionn%C3%A9es%20%3A%201355,mairie%20%3A%202%2C7%20km.&text=*&%20Les%20aires%20d'accueil%20sont,de%20grand%20passage%20\(GP\)](https://visionscarto.net/aires-d'accueil-les-donnees#:~:text=Nombre%20d'aires%20s%C3%A9lectionn%C3%A9es%20%3A%201355,mairie%20%3A%202%2C7%20km.&text=*&%20Les%20aires%20d'accueil%20sont,de%20grand%20passage%20(GP))

¹⁰ Acker William, *Où sont les gens du voyage? Inventaire critique des aires d'accueil*, Editions du commun, 2021. Available at: https://cdn.shopify.com/s/files/1/0079/3313/2881/files/Ou_sont_les_gens_du_voyage_-William_Acker.pdf?v=11950590303093634809

who overstep their bounds. This refusal at the local level leaves children waiting to receive an education between stopping places for such long periods that they often move to a new location by the time they have been accepted at school and need to begin the process again in the new location. This could be prevented if the national authorities wanted to respond more quickly. This can to a certain extent apply to the Gens du Voyage, due to their itinerant lifestyle, but is very common to Roma in illegal squats and shanties, who may need to move when their homes are destroyed by authorities without offering an acceptable housing solution. These realities are recognised in general by the NRSF but not always taken into consideration when proposing temporary solutions such as sheltering in social hotels for inhabitants of shanties.

Another particularity concerning the Gens du Voyage demonstrates the difficulty delivering on the generalities of what is promised due to the details of implemented policies. For example, the NRSF mentions the National Centre for Distance Learning (*Centre National d'Enseignement à Distance*, CNED) in relation to guaranteeing the continuity of schooling for travelling families, although a recent 2021 "law against separatism" (*loi contre le séparatisme*)¹¹ makes it much more difficult to have the right to register in line with this form of schooling. How this will be addressed remains a question, along with what other legal obstacles may arise with respect to other generalised objectives in the NRSF.

The suggested measures in the NRSF include creating regular meetings and consultations with those first concerned to assist with the need to get children into school, as well as proposals to facilitate quicker access to existing legal remedies after the fact from government authorities currently empowered to solve such problems. The use of mediators to help facilitate such instances is also recommended. The issue is approached from the reasonable assumption that the appropriate remedies exist and helping bridge the gap between the people who have not obtained results or do not know how to access their rights would be the most non-discriminatory way of resolving the situation. What remains to be seen is whether sufficient effort and resources will be put into bridging this gap and how to measure the results of those efforts in a timely way to make continuous improvements in reaching those in need of exercising their rights to education.

Part of bridging that gap will absolutely require addressing the current presence of antigypsyism as a matter of prevention and proactive avoidance of such situations with respect to government officials who are currently not acting in a non-discriminatory way. This is not specifically mentioned (either at the local or the national level) in the NRSF in connection with providing access to education mentioned in the second and third objectives of the plan.

2.3. Employment

In accordance with Sectoral Objective 2 of the Council Recommendation, the French strategy undertakes to promote equal access to sustainable and quality employment for people "identified" as "Roma". Thus, the EU recommends that Member States design individualised action plans that take into account beneficiaries' preferences and motivations, the obstacles they encounter, and the reasons why people are unemployed or inactive. Member States are called upon to develop programmes that support first work experiences, internships, apprenticeships, and career development.

This point is addressed by the NRSF in Section 3.3, where it mentions the 'Inclusive Exit from the Slum Through Employment and Housing' (*Sortie Inclusive du Bidonville par l'Emploi et le Logement*, SIBEL) programme in 2019, which aims to offer a training course and access to employment and housing coupled with enhanced individual support for intra-community nationals living in shanties/slums. Although the associations underline the added value of this system (which should however not be offered only to the EU nationals

¹¹ [LOI n° 2021-1109 du 24 août 2021 conformant le respect des principes de la République \(1\)](#)

but to all people regardless of their nationality), it is worth highlighting several shortcomings of the programme which prevent it from fully taking into consideration the disadvantages that the targeted people encounter in access to sustainable employment.

Firstly, the various administrative conditions for benefitting from the SIBEL programme can prove to be too restrictive for people: a bank account in their own name, identity document, registration with the employment centre (*Pôle emploi*) and a domiciliation (also recommended: to have a certain level of French and financial resources when starting the programme). Thus, the many difficulties of accessing direct debit, as observed in several surveys, block potential beneficiaries of the system. As long as this administrative file is not complete, no payment of beneficiaries by the Occupational Security Allowance (ASP)¹² can take place, which can lead to dropping out of the programme. Finally, the remuneration, which oscillates between 200 and 300 EUR per month, often arrives late, even in the event of a complete file. There is no payment of transport costs for getting to the training sites, i.e., no consideration of material obstacles to mobility.

Finally, pursuing the objective of reducing the gender employment gap, the French strategy specifies that the programme will pay "particular attention to the situation of women". However, this 'taking into account' is not accompanied by concrete measures that guarantee inclusion. For example, the Interministerial Delegation for Accommodation and Access to Housing (*Délégation interministérielle à l'hébergement et à l'accès au logement, DIHAL*)¹³ funding for the SIBEL programme could extend aid for childcare or devices for guaranteeing the mobility of people without a driver's licence. Indicators need to be established for how many people drop out of the programme, how many people were successfully taken out of slums, and a qualitative indicator for measuring to what extent those who succeed become sustainably autonomous.

These measures for promoting access to sustainable employment could be broken down into objectives aimed at supporting the employment of Roma professionals in public administration and particularly in public administration structures facilitating access to employment. Following the example of what the European Commission recommends, it would be interesting to create posts of 'employment and youth mediator' within State services (employment centres, prefectures) or local authorities engaged in employment access policy.

The policy of inclusion through employment carried out within the framework of the strategy could include measures that support the formalisation of existing informal employment (for example, the activities of scrap collectors, which are strongly regulated and even repressed by some authorities).

Finally, any strategy aiming to create access to sustainable employment must be accompanied by broader measures aimed at combating antigypsyism and discrimination. The DIHAL, in partnership with the Ministry of Labour, Employment and Integration along with the Minister Delegate for Equal Opportunities, could launch programmes that support inclusive employers, awareness-raising campaigns, and targeted training on combating discrimination and antigypsyism in the labour market addressed to employment services, trade unions and employers.

2.4. Healthcare

France has a high-quality healthcare system offering universal coverage through a single payer insurance system for all citizens, regardless of age or economic situation. It consists of an integrated network of public and private services including doctors, hospitals, and

¹² *Allocation de sécurisation professionnelle*, a benefit paid for securing professional experience.

¹³ DIHAL is the French National Roma Contact Point (NRCP).

specialist providers. Aid exists for foreigners as well, both for those coming from within and outside of the EU, bureaucracy permitting. Recent decades have seen some erosion in services and stagnation in the salaries of healthcare workers due to budget cuts, which came to be seen in a different light under the intense pressure of the COVID-19 pandemic. The health system has not attracted public attention for any form of systemic racism and the provision of healthcare can be considered satisfactory and appropriate in most cases. As with the protection of basic rights, access to healthcare does have some barriers that make it more difficult for some people in need to obtain, and those barriers are amplified by issues of language, social status, and other biases. On the other hand, the public health authorities also represent an unused opportunity for the NRSF.

The public health system, *Santé Publique France*, under the Minister of Solidarity and Health, has partnered with the Interministerial Delegation for the Fight Against Racism, Anti-Semitism and Anti-LGBT Hatred (*Délégation Interministérielle à la Lutte Contre le Racisme, l'Antisémitisme et la Haine anti-LGBT*, DILCRAH) to launch a campaign against discrimination linked to sexual orientation and gender identity and its impact on health, along with the Minister Delegate to the Prime Minister in charge of Equality between women and men, diversity and equal opportunities. On 17 May 2021, they issued a press release which is still present on the home page of their website, on the occasion of the 'International Day against Homophobia, Transphobia and Biphobia'.¹⁴ The political will and innovative partnership are certainly praiseworthy, although no such proposition regarding the effects of antigypsyism on the health of Roma populations was proposed in the NRSF, nor were government healthcare workers targeted for training on antigypsyism.

However, the NRSF proposes an exploratory study to be performed in order to find out what are the primary health concerns, the barriers to accessing preventive medicine and how to remove them, and what tools exist that could be better leveraged to achieve better health outcomes for the Gens du Voyage. It also proposes further support be given to health mediators for these communities. Specific measures of success and expected outcomes are not described.

For the second target group of people living in shanties, healthcare is addressed in a more general manner, referring to living conditions such as access to clean water or avoiding living near landfill sites. The only specific item directly mentioned in the NRSF related to the healthcare system is about facilitating COVID-19 vaccinations. With respect to this second group of slum dwellers, the focus is on improving living conditions, making access to 'housing first' a priority. Civil society associations welcome certain measures that have been set up and financed within the framework of the *Ségur de la Santé*.¹⁵ This part of the strategy is limited to listing the existing systems and certain actors (regional health agencies, (ARS),¹⁶ health mediators) but it may prove to be insufficient concerning the issues related to health in the years to come. There could be difficulties related to access to the State Medical Aid (*Aide Médicale de l'État*, AME),¹⁷ for example, or to the Universal

¹⁴ The public health authority web site and its headline: *Nouvelle campagne contre les discriminations et violences subies par les personnes LGBT+*: "Face à l'intolérance, à nous de faire la différence", <https://www.santepubliquefrance.fr/presse/2021/nouvelle-campagne-contre-les-discriminations-et-violences-subies-par-les-personnes-lgbt-face-a-l-intolerance-a-nous-de-faire-la-difference>

¹⁵ A law called "Ségur law" was enacted in April 2021, to implement the non-budgetary measures of the Ségur de la Santé. It deals with the paramedical professions, renovates the governance of hospitals and makes it possible to deploy healthcare access services (SAS) as well as the "Mon Parcours Handicap" platform.

¹⁶ Regional Health Agencies are in charge of implementing public health policy for regions.

¹⁷ State medical aid is a system that allows foreigners in an irregular situation to benefit from access to healthcare.

Health Coverage Center for Inactive European Citizens (*Centre des Ressortissants Européens Inactifs Cmuistes*, CREIC).¹⁸

Errors often occur in the determination of the right of residence of EU nationals in terms of their legal residence, and their claims are wrongly returned to the AME. This could lead to possible health issues and leads to these unresolved questions:

- How can these policies be better interpreted by health workers and what kind of facilitating measures could fill the space to aid in providing access to healthcare?
- What structural policy measures can be implemented by the state to fight against non-recourse, beyond the national health mediation program?

Access to healthcare is possible if the government takes action. However, there are always difficulties despite the tools. There is no mention of the misinterpretation of the residence rules resulting from the European directives which limit the awarding of social rights in terms of health coverage.¹⁹ Apart from the vaccination measures, the exploratory study to be undertaken, and continued support for mediators, there are no specifics proposed. Examples that could potentially be taken into consideration would be the use of interpreters, mediator training, facilitating use of existing tools and / or creating new tools, etc.

One of the objectives of the French strategy must be the elimination of all discrimination in access to care: it is essential that training against antigypsyism and the fight against unconscious bias be provided in the health sector with health practitioners, medical students, and all hospital staff.

The fight for access to health services for all also involves the fight against the digital exclusion of people designated as 'Roma' in access to public health services. The dematerialisation of administrative procedures affects people in precarious economic circumstances: the development of digital technology replaces human reception and prevents any human support.

Example: to obtain access to state medical aid for European citizens, there are several difficulties. It is necessary to fill in a double form on the internet (one for social security and one for the AME), while people may be in an irregular situation (without a registered residence or domiciliation). It is then necessary to send an application for coverage by national social insurance in order to obtain a written refusal, and only then with this documentation will the AME application be ready to be submitted for processing. The delays are therefore long and require additional support from certain associations.

The associations invite the DIHAL to work with the Ministry of Solidarity and Health in order to reduce the delays in granting the AME, facilitate the procedures, and make them more humane for people.²⁰

¹⁸ All applications for affiliation sent to the national health insurance (CPAM) by inactive European nationals are examined by the national centre called CREIC. The CPAM of the place of residence continues to manage the benefits.

¹⁹ EU Directive 2011/24/EU on the application of patients' rights in cross-border healthcare

²⁰ Source documents describing this procedure in more detail can be found at: https://www.has-sante.fr/upload/docs/application/pdf/2017-10/la_moderation_en_sante_pour_les_personnes_eloignees_des_systemes_de_sante....pdf and: https://www.has-sante.fr/upload/docs/application/pdf/2017-10/interpretariat_dans_le domaine_de_la_sante - referentiel_de_competences....pdf

2.5. Housing, essential services, and environmental justice

There is a shortage of affordable housing in France in regions that are more densely populated with stronger economic activity. For example, the region of *Île de France* where Paris is located has seen housing prices soar, it has the most jobs to fill, and it is also the location of the largest number of migrant Roma. The already difficult situation is exasperated by the arrival of poor migrants who are willing to construct slum dwellings in order to make use of the economic opportunities that are not present elsewhere in France. The perceived housing crisis has been a hot political topic for decades. For the Gens du Voyage, the number of legal stopping places that are maintained in appropriate condition, despite the legal requirements of municipalities to do so, has also been insufficient for decades.

The NRSF places emphasis on the principle of 'housing first' in order to regularise and enable social insertion in that it is the gateway to facilitating solutions related to employment, education and healthcare. Compared to the past decade, when the emphasis was on destroying shanties/slums and evicting the inhabitants from a national security point of view, this is a welcome approach. Whether or not this can be ascribed to a new more humanitarian approach or a lack of resources during the COVID-19 pandemic, the fact remains that there has been a noticeable change in approach. With respect to migrant Roma and the inhabitants of slums, civil society associations are in favour of applying the principle of 'housing first' to structure public policies in terms of access to accommodation and housing, which is proposed in the NRSF. Common-law pathways to residency should be encouraged. Environmental justice will be served when inhabitants of slums are provided housing solutions, eliminating the need to squat on abandoned industrial sites or create shantytowns on polluted territory.

The strategy seems to be aligned with these wishes of civil society. It implies that policies should aim not to eliminate slums *per se*, but to eliminate all situations of great precariousness and fight against housing deprivation. There are, however, many people (Roma and non-Roma, and the NRSF must address this in a universal non-discriminatory way for all people according to French law) who are still faced with the deprivation of decent housing despite having left the squats and slums. These people, who gravitate to emergency arrangements, humanitarian assistance, social hotels, or 'extreme cold' plans are not taken into consideration in the measures targeted by the strategy. These people are in an 'in-between' situation between the slum or squats and access to permanent housing.

Section 3.2 of the NRSF refers to a 'housing first' policy as a way to prioritise housing in order to facilitate access to other social services, such as employment, education, etc. The figures used to evaluate the 'housing first' policy should include the number of people rehoused (1,464 people in 2020) but also other data collected on the slum clearance platform²¹ that will make it possible to effectively evaluate housing deprivation: for example, the percentage of people living in dwellings without toilets, showers or bathrooms inside the dwelling, or in dwellings with leaky roofs, walls, damp floors or foundations, dwellings without rot and/or overcrowded dwellings not adjusted to the wishes of the families.

Civil society associations encourage the DIHAL to implement action that guarantees equal access to social housing, transitional housing and integration programs and that fights against discrimination in this sector. The rules and procedures that allow access to housing must be transparent and accessible to applicants. The criteria to be taken into consideration must privilege the social needs and not the 'merits' of the candidates. Access

²¹ Translation of an official term, *la plateforme de résorption des bidonvilles*. This tool is not globally implemented across the entire territory of France, and civil society associations are wary of entering data that may potentially be misused against the people it is supposed to be helping as sensitive data is made available to a number of public actors.

to shelter and housing should not carry out an 'implicit skimming' of beneficiaries, thus excluding the most vulnerable individuals and families.

The location of housing should allow people access to basic services and infrastructure (health services, public transport, schools, day-care centres, etc.) and take into account the territorial anchoring of people.

Finally, the Housing First policy cannot be effective without revising the evictions of squatter and slum dwellers. This requires a structural change in the legal provisions and public policies relating to evictions. There is a need for clear eviction guidelines to be put in place and effectively enforced to protect against improper evictions, with particular attention to households with children. Although the 2018 inter-ministerial instruction governs the eviction procedures, this is very rarely implemented by the prefectures (lack of social diagnosis in 96%, lack of shelter or rehousing solution in 91%, according to figures compiled by the Observatory of Evictions from informal living spaces).

While the issue of housing as described above has mostly been applied to the target group of slum dwellers, which covers migrant Roma, there are also some interesting proposals with respect to the treatment of caravans in the NRSF for the other target group, Gens du Voyage. Proposals regarding support for adapting legal restrictions to allow long-term caravan parking on private (family-owned) land and launching studies regarding the current legal status of caravan homes and forms of legal protection currently unavailable for people not living in houses have been raised, but no measures have been specified. The willingness to discuss this in regular meetings with civil society representatives such as the CNCGV shows promise, although as stated at the beginning of this report, concrete outcomes and indicators for measuring results are vague and there remain issues regarding the inclusion of other participants. Continued monitoring will be necessary to ensure there is follow through on proposed actions. This is necessary not only from a common-sense point of view, but especially for obtaining and maintaining the engagement of the Gens du Voyage communities who expend energy to provide feedback and very often have not seen results or political will from their counterparts with respect to timely follow through in the past.

It should be noted that while the NRCP was working on putting together the NRSF, the government reinforced the repression²² against the 'illicit' halting of Gens du Voyage, disregarding the systemic lack of legal stopping places entailed by the Besson law (law on halting and housing of Travellers). The related fine, known as AFD (*amende forfaitaire délictuelle*) is 500 EUR. It remains in the competency of the police force to assign the AFD, but it is now a penal sentence without access to recourse, and in case of recidivism (which is inevitable), the penal sanction can be up to two years imprisonment and 15,000 EUR. The AFD is currently only applied in five jurisdictions, but may it be extended across the whole territory of France. Clearly, the coordination of different government bodies will continue to play a role as to whether the NRSF can be successfully rolled out.

2.6. Social protection and social services

France has an extensive social welfare system and the NRSF focuses in general on gaining access to universal rights in order to support eligibility to social protection for all people in need, without any specification or focus on ethnicity or minority status. The NRSF approaches the topics of housing, education, healthcare, and employment; all via gaining access to the universal social services system, which is in alignment with the European Commission's approach toward Roma. Discrimination against social groups or due to national origin may impede access to social protection, and while remedies exist under

²² [Mermoz, Mélanie, "Gens du voyage: l'amende forfaitaire de Darmanin dans une ornière," Médiapart, 1 December 2022.](#)

French law, the tools to address the issues require specialised knowledge of administrative procedure.

During the last two years, the legal department of La Voix des Roms has treated a series of cases in which in the Paris area the Family Benefits Fund (*Caisse des Allocations Familiales*, CAF) has stopped income support to EU-mobile Roma and demanded the reimbursement of amounts that sometimes go beyond 30,000 EUR. Actually, an internal note provided with indicators that might help evaluate the 'right of residence' for independent EU workers has been interpreted as establishing compulsory obligations while the EU law only requires the independent activity to be real. It seems that a monitoring campaign targeted at EU-mobile Roma having registered independent activities, mostly in recycling, has resulted in such decisions, which often are illegal.²³ Although the DIHAL has explained the right of residence,²⁴ this has not impeded such decisions and some supplementary and well targeted action is needed in respect of the CAF.

The digital divide, internet access, bank accounts, permanent addresses, access to transportation, and other bureaucratic obstacles generate access barriers to minimum income schemes. Eligibility for income support, child support and other benefits can be hindered for these same reasons. The NRSF does not indicate any general measures nor any specific proposals for overcoming these issues, other than its first objective of combating antigypsyism.

Continued dialogue between civil society partners and government agencies is necessary to monitor these impediments and find ways to overcome them so that potential beneficiaries can gain access to programs for which they are rightly eligible.

2.7. Social services

The NRSF does not mention any detailed measures for any additional social programs. In Section 3 of Objective 2 of the NRSF related to the Gens du Voyage, a number of existing laws and measures are mentioned with respect to access to education. There is no mention, however, of how to measure the effectiveness of these existing laws or identify what is hindering enforcement so that rights are accessed. Section 3.3 suggests studying new and innovative measures, for example supporting parents in order to ensure the school attendance of children, but how they can actually support parents or what kinds of results are expected is not mentioned. Universal programs for supporting older people to remain active in the workforce and supporting people with disabilities are mentioned but what, if anything, could be done to bridge the gap between those rights under the law and cases where people are not gaining access to those programs is not explained. No mention of overcoming addictions or other crises, other than those specifically addressed in other sections of this report (housing, employment, child protection, etc.) are found in the NRSF.

2.8. Child protection

In France, child protection is under the jurisdiction of the departments, which are local powers. However, the central government plays an important role in this domain too, especially through partnership between the regional agencies of health and the departments. And so, the child protection section of the NRSF deals in fact with maternal and healthcare protection of children and not with the specific protection of children from harm, including violence, exploitation, abuse, and neglect.

The almost complete lack of data for measuring the extent of child abuse against Roma children, together with some minimal existing evidence, are indicators of the existence of

²³ [Interview](#) with Saimir Mile, May 2022

²⁴ Guidelines published by the DIHAL can be found at:

https://www.gouvernement.fr/sites/default/files/contenu/piece-jointe/2020/12/dihal_fiche_reperage_droit_sejour.pdf

institutional discrimination and support the argument that increased awareness raising and appropriate mandatory training of professionals about antigypsyism is necessary. Regular checks against abuse are of utmost importance in this domain, in order to prevent the latter from acting upon their biases and stereotypes about the 'Gypsies' in the exercise of their duties, primarily to protect children and avoid further harm. An example of this is the case of young Roma girls, often of Romanian nationality, who are over-penalised and frequently go to prison for simple theft. They undergo exceptional judicial treatment, different from other non-Roma adolescents, both from the point of view of educational measures and penal responses, such as the placement in cells of Roma girls younger than 13 years old. Shorter legal process before a judgement occurs on account of them being 'Romanians'. Prison is a common punishment for offences committed by juvenile Roma, although jail is an exception in the routine functioning of juvenile justice.²⁵

The NRSF does however address human trafficking, early marriages, and access to health and education under Objective 3, relative to intra-European nationals living in precarious situations. Human trafficking is mentioned 14 times in the NRSF in relation to begging, prostitution and early marriages as being the main topics contributing to the delinquency of minors. Members of civil society observed the exaggerated importance granted to these phenomena of early marriages and juvenile delinquency, which, according to the very specialists who speak about them, in particular in consultations with the DIHAL, are mentioned and addressed from a biased point of departure. On this point, the strategy adopts a somewhat schematic victim-offender perspective, which does not consider the general and complex situations in which the root causes of the phenomenon are to be found. This is a very sensitive subject where such an approach can result in counterproductive measures that perpetuate stereotypes and the cycle of exclusion. The harm perpetrated against Roma children is particularly severe here. In addition, some of the measures may also convey the message that Roma children should be protected against their parents, whereas targeted measures could address, *inter alia*, parents' role in preventing violence against children.

2.9. Promoting (awareness of) Roma arts, culture, and history

It is no surprise that one of the two groups targeted by the NRSF, slum dwellers, often coming from outside of France, do not receive any attention regarding their arts, history and culture under the French NRSF. The other group that falls within the scope of the NRSF are the Gens du Voyage, who are French citizens. The NRSF does vaguely address several points with respect to linguistic, cultural and historical issues. The subject of collective memory and memorialisation with respect to their historical deportation and genocide during World War II, and their forced confinement in detention camps on French territory which lasted until 1946, a year after the war ended, merits this attention. A review of actions taken and development of further actions concerning how this can be supported are mentioned in the NRSF; however, the measures remain "to be defined". It is not clear what form they will take or what kind of budget will be available for this.

It is our hope that, as a result of efforts to combat antigypsyism, the first objective of the NRSF, the perceived definition of 'gypsy' (being one who is outside of society and does not participate as a citizen) will be put under the spotlight and such presumptions will be exposed in current policies affecting Roma populations. This is a long-term goal that will take time; however, the first step has been taken.

There is generally very little knowledge about the Roma in France; few resources are readily available to the general public and part of this can be attributed to the universalist approach to public life, i.e., one in which no minorities are recognised and, somehow, 'one

²⁵ Arthur Vuattoux, *Les jeunes Roumaines sont des garçons comme les autres*, in: Plein Droit 2015/1, nr. 104, pp. 27-30, <https://www.cairn.info/revue-plein-droit-2015-1-page-27.htm>

size should fit all'. Everyone who is considered French regardless of which region or heritage they come from may be supposed to experience this equally. However, Roma are typically included as part of the historical population of France. They are generally understood by the public to be 'gypsy' populations. The 'gypsy' is generally not included within this basket of regional identities nor among the identities of immigrants who have come to France. That is because the gypsy is the 'other', the anti-citizen, a fictitious character, which understanding feeds into the portrayal of Roma as 'non-citizens'. It is a construct that stays fixed in time and means that the Roma are treated as outsiders in relation to the French national narrative. The 'gypsy' is very well known in France, though it is not well understood that this is a construct and that only through its deconstruction can anyone get to know how it affects the real people behind this name. In this way, if there is political will and follow-through on what is mentioned in the NRSF, additional measures can be defined over time.

3. EXPECTED EFFECTIVENESS

3.1. Coherence with related domestic and European policies

While many Roma rights activists are critical of the new strategy, it is widely acknowledged that a significant step forward has been taken in comparison to the former strategy and its implementation. The NRSF for the first time is expressed in an official document for the period of 2020 to 2030. This represents a step forward in the political will to address matters by finding a way that is consistent and coherent within the framework of French law and French republican ideals and agreed upon within the inter-ministerial delegation that makes up the NRCP, despite some reluctance from parts of some ministries due to their perceptions of what a universalist approach could include. The NRSF has been drafted and could not be published if it were not expressed in a manner that is coherent and compliant with French public policies.

In order to achieve this compliance and coherence with the said universalist approach, the NRSF cannot specifically mention Roma. Minorities are not recognised in France. The issues of social inclusion that are addressed are not based on ethnicity, but rather legal and social categories of people, which is actually more coherent than the European Commission's approach which treats Roma, an ethnic group, as a social category according to its policies. This makes it even more remarkable that the French NRCP has decided to make combating antigypsyism its first objective. This is based on input it has received from civil society partners. Embarking on the road to discover what antigypsyism is and how it affects public policies is the first step to assessing the preconditions necessary for strategic interventions. These preconditions remain to be discovered by the NRCP. One might argue that such a specific form of racism goes against French universalist principles, and this has been mentioned by some officials. However, the conclusion was that a universalist approach can take into consideration specific forms of racism, and it was accepted as a way to better combat racism.

Much remains to be seen with respect to the implementation and follow up. Other than an organised conference/consultation, which took place on 28 June 2022, many of the items related to this transversal subject remain to be defined in the NRSF. It currently remains in a silo in the official NRSF document, and it will need to be adapted and grounded in the action plans of the second and third objectives in order for the entire strategy to be effective because it is subject that needs to be applied transversally.

For the remaining two objectives in the NRSF, they target two groups of people in practical terms. In Objective 2, the NRSF addresses the Gens du Voyage. This is a legal category of French citizens who have an itinerant lifestyle, not an ethnic group, although many of them can and do claim to have some sort of Roma heritage. Objective 3 of the NRSF addresses people living in slum dwellings and shantytowns, who most often are migrants and include a high percentage of people with Roma heritage coming primarily from Bulgaria and Romania. Non-Roma people with citizenship from Bulgaria, Romania and sometimes from other countries have also been found to live in such conditions. The NRSF aims to facilitate lifting these people out of poverty within the framework of the existing French social system, regardless of their nationality or self-identification. This also represents progress, whereas in the previous decade forced evictions and the destruction of shantytowns for so-called reasons of national security predominated the policy. In this way, the NRSF actually does target a significant number of Roma peoples with specific needs to access the social welfare system. Although the social welfare needs are different in the case of the Gens du Voyage, they are addressed as such, and the NRSF goes further by mentioning support for recognition of history, culture and language within the French context for this target group of French citizens. Similarly to the first objective, the somewhat limited specificity of the rest of the plan also leaves open questions regarding the ability to measure success.

We cannot say the majority of Roma in France are captured by these two categories. There are no official statistics. These two categories clearly do not capture middle-class, sedentary or assimilated Roma in France that have arrived throughout the ages for generations. The NRSF could contribute significantly to promoting the equality and inclusion of target groups through the second and third objectives; however, it has the potential to affect all Romani peoples via its first objective of fighting antigypsyism. If all three objectives are followed through upon, measured and evaluated, and if the NRCP can gain the political support of relevant government stakeholders beyond its immediate mandate for transversal implementation, this could potentially have a significant impact across Europe.

The NRSF refers to several government circulars (official documents) that validate the mandate and the points of view expressed to be in coherence with existing laws and policies. There are no further documents from other government bodies mentioned with respect to forward-looking requirements, implementation, evaluating success, or changes needed in other policy documents in order to meet the objectives of the NRSF. Indeed, the lack of specificity has been mentioned previously and is acknowledged by the NRCP, as it is early in the process, and resources are not currently allocated for measuring evaluations.

3.2. Responsibility for NRSF coordination and monitoring

The National Roma Contact Point (NRCP) is the DIHAL, the Inter-ministerial Delegation for Accommodation and Access to Housing, which is responsible for implementing public policy associated with accommodation, access to housing and keeping homeless people in housing, or at least poorly housed, with the aim of significantly reducing the number of homeless people since July 2010. Neither its mission nor its budget is intended primarily for 'Roma' but rather for dealing with these housing and social insertion issues on a national level. Within its competencies and responsibilities is a consultative mission with the Gens du Voyage related to accommodation, housing and other issues. Other ministries, other inter-ministerial delegations and the national equality body (Defender of Rights)²⁶ were consulted in the preparation of the NRSF and the DIHAL seems to have the reach needed to accomplish its mission. The DIHAL does not have the capacity to regularly incorporate regional and local authorities and their involvement in preparation and design, or implementation is limited and on a voluntary basis. Its capacity to influence other ministries and regional and local authorities may be a limiting factor in eliminating the current avoidance of responsibilities by many of these bodies. For example, while the DILCRAH particularly welcomed the adoption of the NRSF and especially the specific targeting of the antigypsyism, its absence in the workshop 'Antigypsyism: understanding for naming and acting' gave a negative signal about the willingness of this intergovernmental body to take responsibility for this important field that is in its jurisdiction.

3.3. Quality of the plan

With the exception of a few items, the document does not present clear timelines, deadlines, fixed objectives, expected policy outcomes, risks, or mitigation plans. The uniformity of data collection tools and methods regarding the needs of both of the target groups could also be improved. Several items in the plan are exploratory studies, leading to the discovery of issues, obstacles and prerequisites for successful outcomes. This is certainly true with respect to issues of collective memory and culture, identifying areas for effective use of health mediators, and finding new innovative ways to approach

²⁶ At the end of 2021, The Defender of Rights published its contribution to the NRSF "for the effective protection of the rights of Roma": <https://www.defenseurdesdroits.fr/sites/default/files/atoms/files/rap-strat-roms-migrants-eng-num-05.22.pdf> and about "Travellers breaking down barriers to rights": <https://www.defenseurdesdroits.fr/sites/default/files/atoms/files/rap-strat-roms-eng-num-05.22.pdf>

improvements to educational outcomes for the Gens du Voyage. It is especially true with respect to antigypsyism. Therefore, it is no surprise that such detailed evaluation plans and outcomes do not exist yet.

On the other hand, items concerning rights afforded to people in houses but not to people in caravans, and supporting the removal of barriers to accessing existing rights with respect to education and accommodation at stopping places should already be documented sufficiently by the NRCP and by NGOs. Examples of more specific suggestions for specific situations have been provided in this report throughout Sections 1 and 2. More specific measures for evaluating success and policy outcomes would build good faith from the first concerned people regarding political will in taking on these subjects and following through to resolving them.

Risks such as determining the appropriate level of content and training methods on antigypsyism are not clear at this point because there is not sufficient detail to criticise. Research is needed on various topics with respect to practical cases where antigypsyism training should apply but has not yet taken place, and examining the viability of launching a pilot program that can be tested, scaled up and continuously improved would improve the feasibility of creating a long-term sustainable program.

The Strategy is a public policy for the next ten years. Maybe it is too demanding to ask for a clear action plan, but governance mechanisms and implementation mechanisms should be defined.

3.4. Funding

The DIHAL had a budget of 2.4 billion EUR in 2020 and approximately 50 employees including apprentices and interns.²⁷ The annual budget is for its universal mandate on housing, accommodation and facilitating social insertion, not just for 'Roma'. According to the perception of one civil society organisation, they are under the impression that the resorption policy for slums is covered by approximately 8 million EUR per year, which seems underfunded.

How much funding is needed for reaching out to other government bodies with respect to research and training on antigypsyism is not clear. Funding needs for individual items listed in the NRSF are not clear either at this point in time.

The DIHAL currently does not have resources budgeted for the evaluation and measuring of outcomes proposed in the NRSF. It may seek co-financing from the European Commission in order to provide such audit reports.

3.5. Monitoring and evaluation

Outcome indicators and process indicators are not in place for most items. Data collection is planned and is necessary in order to design measurable outcomes and determine appropriate indicators. Clearly, feedback is needed in order to make these adjustments. A dedicated budget for monitoring is not currently available. Both data collection for monitoring and participative monitoring require the allocation of resources. This should be made explicit in the NRSF.

How the DIHAL will foster the topic of fighting antigypsyism when topics such as antisemitism and LGBTIQ+ phobia are handled by a separate inter-ministerial delegation known as the DILCRAH, and the long-term success of recognising this specific form of

²⁷ The organisational chart can be found at:

https://www.gouvernement.fr/sites/default/files/contenu/piece-jointe/2022/03/organigramme_mars_2022.pdf

racism across all relevant government bodies remains a challenge to be defined, in order to be monitored and evaluated.

3.6. Assessment of the expected effectiveness and sustainability

As mentioned before, the task of dealing with antigypsyism is a bold new innovative step forward. A limited-scope pilot program should be launched and tested so that it can be scaled up and structured in a way that would allow for continuous improvement; however, the details for such a plan have not yet been developed and therefore cannot be judged for the time being. Success will be dependent on successful transversal implementation which requires a project management approach that can sufficiently influence stakeholders of the need to participate in such a project.

Most of the objectives and milestones are not yet defined in a specific enough way to be able to provide judgement as to what more specific evaluation indicators could be suggested for helping judge effective or successful implementation.

Regarding the two groups that have been roughly targeted within present legal constraints, the recommendations within the strategy may have potentially positive effects, although the NRCP cannot alone enforce all of its recommendations or ensure that they are all followed at the local level. How it will be enforced and brought to life remains to be defined. In some instances, a lack of enforcement has been anticipated and remedial measures offered at the national level could serve to limit non-compliance at the local level. For example, if a mayor or a local school authority were to refuse to enrol a Roma child despite the clear illegality of such a refusal, as has happened many cases in the past, it would now be possible to immediately appeal to a government official at the national level through the office of the Prefect of the given region, who could immediately order the acceptance of the child without undue delay. This would, however, ultimately also depend on whether the prefect's personnel have been sufficiently trained to recognise a case of antigypsyism and react accordingly.

Finally, the NRCP only has the power to make recommendations with respect to other government agencies and not to enforce policies that would make any agency accept its recommendations beyond its current mandate of dealing with housing and social insertion issues.

4. ALIGNMENT WITH THE EU ROMA STRATEGIC FRAMEWORK

4.1. Reflecting diversity among Roma

As the NRSF is a universal programme, that is to say a mainstream programme, it does not address 'Roma' per se. As it is a mainstream programme that focuses on two specific groups, a social (poor eastern European Roma living in shanty towns) and a legal (Gens du Voyage) category, we cannot say that it attempts to address the diversity that exists among the Roma populations of France. It does however attempt to address the largest number of the most visible Roma through these categories, thus EU nationals from Romania and Bulgaria living in poverty who have a Roma background are covered as a whole, along with the Gens du Voyage category.

Children are targeted through actions aimed at improving access to education and increasing the number of children enrolled in school by facilitating access to basic rights. Children are also mentioned with respect to protection from human trafficking along with women, but how this protection will be demonstrated and measured is not clear. Women are mentioned four times in the NRSF, twice with respect to human trafficking, once with respect to employment, and once with respect to the SIBEL program. As pointed out in Sections 2 and Section 3.3. of this report, there are no actions described concerning how these targets will be addressed or what their perceived special needs are. Other than women and children, no other specific diversity category is mentioned, and in no case are any special measures described in detail regarding how to reach them, accommodate special needs, or measure success in addressing those needs.

There are no official statistics, and it is difficult to estimate the number of persons with disabilities, elderly, LGBTIQ+ or other intersectional groups that fall into these categories. Roma who are not EU nationals or are stateless are not visibly present in large numbers. When they do arrive as refugees, for example, they are treated under universal mainstream programs successfully. The success of the latter is a presumption, because we are unaware of any cases of discrimination and the social integration programs available for refugees are more extensive than the social aid available to migrants coming from within the EU.

The Roma are not always a visible minority, and legally, public institutions are not supposed to take into consideration any national or ethnic origins with respect to any public policy. The richness in diversity in the number of different subgroups of Roma who have arrived on the territory of France in different waves of immigration between 1419 CE and the present unfortunately does not serve as a unifying force within or between various Roma communities. On the contrary, under the prevailing pressure of antigypsyism, members of particular groups may prefer to self-identify as only members of that group out of fear of being stigmatised and as an act of self-preservation in order to create distance from the stigmatised group. This reaction is understandable, but it does not challenge the deformed perceptions of the general public. Rather, it tries to circumscribe the 'other gypsy'.

This makes it hard to identify the groups who make up the whole of the umbrella term Roma. Therefore, the most relevant aspect of diversity worth addressing would be the inclusion of various groups of different ethnic Roma communities, so that the greatest number of people could be reached. This ethnic aspect has understandably not been taken into consideration in the current NRSF. Furthermore, it makes it even more difficult to reach out to various sub-segments of any of these already divided populations according to further demographically specific categories such as age, sex, gender identification, sexual preference, or disability. Certainly, those intersectional groups exist and have special needs; however, if the goal is to increase participation, then it is the larger categories that should be addressed first.

Despite the confusion and misinformation that is also amplified by irresponsible journalistic practices in the media regarding who the Roma are, there is nevertheless a very common idea of the 'gypsy' (in French, *tsigane*) and all the stereotypes that have consistently been attributed to this fictional other by the French general public. The 'French general public' includes recent immigrants from Africa and Asia. This is one of the reasons why La Voix des Rroms has put forth its recommendation to address antigypsyism in the general public and within government institutions because until the deconstruction of the concept of the 'gypsy' takes place, there will be no understanding of who the Roma are and who they are not.

Beyond this complexity, which partially explains the weakness of the Roma civil society, pro-Roma civil society is consulted within two frameworks: the National Consultative Commission of the Gens du Voyage and the National Commission for the follow-up of Shanties' Clearance. Both of these consultative bodies bring together central and local government representatives, representatives of civil society, and independent bodies. They meet under the auspices of the DIHAL, which manages the secretariat of these two parallel consultation processes

4.2. Combining mainstream and targeted approaches

French law does not permit a targeted approach to any ethnic group. The policies discussed in this report were conceived to be inclusive of Roma populations without naming them or targeting them exclusively, and being open to all people in such situations regardless of their ethnic, and in some cases, national origin. In this way, the French state and its policy can be constitutionally considered inclusive.

4.3. Usage of instruments introduced by the Council Recommendation

There is no plan to engage more 'Roma' professionals as mediators to help overcome the persistent lack of trust between the two target groups and majority communities. We are unaware of any plan to use EU and other funds to provide regular capacity-building, other than the mentioned possibility of soliciting funds related to the evaluation of the NRSF. There are no specific plans to promote positive action to increase Roma participation in national and local administrations.

CONCLUSIONS AND RECOMMENDATIONS

As previously mentioned, for the first time the French government has succeeded in creating a national strategy that complies with both French perceptions of republican social citizenship, which does not conceive of any segmentation by ethnicity, and the requests of the European Commission. It is a step in the right direction. It has also used input from Roma civil society. It remains to be seen how this NRSF will further be articulated into action plans, specified, implemented and measured. It is hard to judge how successful the strategy will be without more details; however, the potential for major positive improvements is recognised as a result of the process that has thus far taken place.

The potential of positive change resides in the combination of two principal points: the priority given to the fight against antigypsyism and the nature of the strategy as a soft law text. Provided that this combination is mobilised wisely, and that the letter of the strategy is interpreted in a spirit of search for progress, the fact that material provisions are generally those that exist already should avoid the feeling of '*déjà vu*' and pessimism. Here maybe more than elsewhere, what can make the difference is not new tools, but rather a renewed will to really use them and to use them in an innovative and efficient way.

Recommendations to national authorities

1. Continue to follow through on building the details of the current plan to make it actionable, measurable and possible to evaluate the degree of success throughout the decade as well as at the end of the decade.
2. Continue to champion the need to recognise the concept of antigypsyism, undertake the necessary practical research, and apply measures to combat antigypsyism in all mainstream public institutions by continuing to target more specific policy outcomes, ensuring cross-ministerial coordination, and mainstreaming Roma awareness into all public sector policies beyond those directly covered by the DIHAL (e.g., Ministry of Education, DILCRAH, etc.).
3. Continue dialog with civil society, clearly define the governance structure and accountability mechanisms of the consultation structure and recognise the limitations and disadvantages of a weak civil society by clearly assuming obligations derived from International Human Rights frameworks and the Council recommendation as well as respecting the related added value of government action, civil society services and the self-organisation of Roma.
4. Take into consideration the need to lower access barriers, bridge the digital divide and ensure ongoing incorrect interpretations of the law at the local level as an effective preventive measure, specifically regarding inefficient bureaucratic procedures of programmes and tools, e.g., the CAF, the AME and the SIBEL program.
5. Include measures that support the formalisation of existing informal employment either within or along with the SIBEL program, as well as specific measures to facilitate the access of women and women with children.
6. Establish indicators of how many people drop out of the SIBEL programme, how many people were successfully taken out of slums, and a qualitative indicator for measuring to what extent those who succeed become sustainably autonomous.
7. As the NRCP progresses toward a better understanding of antigypsyism and creating measurable objectives in this field, it should review its existing strategies for improvement. For example, with respect to human trafficking or early marriages, responses to the relative importance of this subject should be adjusted

according to the real significance of the actual problems and to the mechanisms that maintain them.

8. National and local authorities should implement the 2021 recommendations of the Defender of Rights as part of its contribution to the national strategy for the effective protection of the rights of Roma and of Gens du Voyage.

Recommendations to European institutions

9. Remember that Roma is an ethnic category and apply available knowledge of antigypsyism to the wording and treatment of social policies that respects this while attempting to achieve inclusion by reaching out to those Roma in targeted social groups as equal citizens.
10. Recognise the diversity of Roma populations and ensure that reaching out to include them does not simultaneously treat them as a special category of outsiders.
11. Facilitate increased interactions and exchanges between wider civil society networks and relevant initiatives at the European level and French organisations belonging to Roma and Gens du Voyage.

Recommendations to civil society

12. Continue to hold the government accountable, build its capacity, and offer suggestions for practical solutions to reduce the gap between policy intentions and the reality facing neglected populations.
13. Contribute to the reinforcement of the civic initiatives from individuals and groups of people stigmatised as 'gypsies', both by integrating them into existing mainstream organisations and in creating new ones that target more specifically their respective communities.

Recommendations to other stakeholders

14. The DILCRAH should take primary responsibility for Chapter 1 of the NRSF on antigypsyism, as the latter is a form of racism.
15. The Defender of Rights should work closer with civil society to help promote a better understanding of the racial discrimination and antigypsyism Roma and Gens du Voyage communities face in France and across Europe amongst state authorities and the general public. The prerequisite for this is that the Defender's office needs to invest time in learning about antigypsyism sufficiently before proceeding with this.

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ANNEX: LIST OF PROBLEMS AND CONDITIONS

Fighting antigypsyism and discrimination

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Antigypsyism not recognised as a specific problem in national policy frameworks	critical problem	understood with limitations	present but insufficient	adequate but with room for improvement
Prejudice against Roma	critical problems	understood with limitations	adequate but with room for improvement	adequate but with room for improvement
Hate crimes against Roma	minor problems	understood with limitations	adequate but with room for improvement	adequate but with room for improvement
Hate speech towards and against Roma (online and offline)	significant problems	understood with limitations	adequate but with room for improvement	adequate but with room for improvement
Weak effectiveness of protection from discrimination	significant problems	understood with limitations	adequate but with room for improvement	adequate but with room for improvement
Segregation in education, housing, or provision of public services	critical problems	understood with limitations	present but i	adequate but with room for improvement
Forced evictions and demolitions leading to homelessness, inadequate housing, and social exclusion	Significant problems	understood with limitations	adequate but with room for improvement	adequate but with room for improvement
Statelessness, missing ID documents	minor problems	irrelevant	absent	absent
Misconduct and discriminatory behaviour by police(under-policing/under-policing)	critical problems	mentioned but not analysed significantly	present but insufficient	some targets but not relevant
Barriers to <i>de facto</i> exercise of EU right to free movement	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant

Education

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Lack of available and accessible pre-school education and ECEC services for Roma	irrelevant	irrelevant	absent	absent
Lower quality of pre-school education and ECEC services for Roma	irrelevant	irrelevant	absent	absent
High drop-out rate before completion of primary education	significant problems	understood with limitations	present but insufficient	some targets but not relevant
Early leaving from secondary education	minor problems	irrelevant	present but insufficient	some targets but not relevant
Secondary education/vocational training disconnected from labour market needs	minor problems	understood with limitations	adequate but with room for improvement	adequate but with room for improvement some targets but not relevant
Misplacement of Roma pupils into special education	irrelevant	irrelevant	absent	absent
Education segregation of Roma pupils	irrelevant	irrelevant	absent	absent
Increased selectivity of the educational system resulting in concentration of Roma or other disadvantaged pupils in educational facilities of lower quality	significant problems	irrelevant	absent	absent
Limited access to second-chance education, adult education, and lifelong learning	critical problems	irrelevant	present but insufficient	some targets but not relevant
Limited access to and support for online and distance learning if education and training institutions close, as occurred during the	critical problems	understood with limitations	present but insufficient	some targets but not relevant

coronavirus pandemic				
Low level of digital skills and competences and limited opportunities for their development among pupils	critical problems	irrelevant	absent	absent
Low level of digital skills and competences and limited opportunities for their development among adults	critical problems	irrelevant	absent	absent

Employment

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Poor access to or low effectiveness of public employment services	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Youth not in employment, education or training (NEET)	significant problems	understood with limitations	present but insufficient	some targets but not relevant
Poor access to (re-) training, lifelong learning and skills development	significant problems	understood with limitations	adequate but room for improvement	some targets but not relevant
Discrimination on the labour market by employers	significant problems	understood with limitations	adequate but room for improvement	some targets but not relevant
Risk for Roma women and girls from disadvantaged areas of being subjected to trafficking and forced prostitution	minor problems	understood with limitations	adequate but room for improvement	some targets but not relevant
Primary labour market opportunities substituted by public work	irrelevant	irrelevant	absent	absent
Barriers and disincentives to employment (such as indebtedness, low	minor problems	irrelevant	absent	absent

income from work compared to social income)				
Lack of activation measures, employment support	significant problems	understood with limitations	adequate but room for improvement	some targets but not relevant

Healthcare

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Exclusion from public health insurance coverage (including those who are stateless, third country nationals, or EU-mobile)	irrelevant	irrelevant	adequate but room for improvement	adequate but with room for improvement,
Poor supply/availability of healthcare services (including lack of means to cover out-of-pocket health costs)	minor problems	understood with limitations	adequate but room for improvement	adequate but room for improvement
Limited access to emergency care	irrelevant	irrelevant	absent	absent
Limited access to primary care	minor problems	irrelevant	absent	absent
Limited access to prenatal and postnatal care	minor problems	understood with limitations	adequate but room for improvement	adequate but room for improvement
Limited access to health-related information	minor problems	understood with limitations	adequate but room for improvement	adequate but room for improvement
Poor access to preventive care (vaccination, check-ups, screenings, awareness-raising about healthy lifestyles)	significant problems	understood with limitations	adequate but room for improvement	adequate but room for improvement
Poor access to sexual/reproductive healthcare and family planning services	minor problems	understood with limitations	adequate but room for improvement	some targets but not relevant

Specific barriers to better healthcare of vulnerable groups such as elderly Romapeople, Roma With Disabilities, LGBTI and others	minor	understood with limitations	adequate but room for improvement	some targets but not relevant
Discrimination/antigypsyism in healthcare (e.g., segregated services, forced sterilisation)	minor problems	understood with limitations	adequate but room for improvement	adequate but room for improvement
Unrecognised historical injustices, such as forced sterilisation	minor problems	understood with limitations	adequate but room for improvement	some targets but not relevant
Inequalities in measures for combating and preventing potential outbreaks of diseases in marginalised or remote localities	critical problems	understood with limitations	present but insufficient	some targets but not relevant

Housing, essential services, and environmental justice

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Poor physical security of housing (ruined or slum housing)	critical problems	understood with limitations	adequate but room for improvement	some targets but not relevant
Lack of access to drinking water	significant problems	understood with limitations	adequate but room for improvement	some targets but not relevant
Lack of access to sanitation	critical problems	understood with limitations	present but insufficient	some targets but not relevant
Lack of access to electricity	significant problems	understood with limitations	adequate but room for improvement	some targets but not relevant
Limited or absent public waste collection	significant problems	understood with limitations	adequate but room for improvement	some targets but not relevant
Restricted heating capability (families unable to heat all rooms/all times when	significant problems	understood with limitations	adequate but room for improvement	some targets but not relevant

necessary) or solid waste used for heating				
Lack of security of tenure (legal titles are not clear and secure)	significant problems	understood with limitations	adequate but room for improvement	some targets but not relevant
Lacking or limited access to social housing	significant problems	identified and analysed sufficiently	adequate but room for improvement	some targets but not relevant
Overcrowding (available space/room for families)	irrelevant	irrelevant	absent	absent
Housing-related indebtedness at levels which may cause eviction	minor problems	irrelevant	absent	absent
Housing in segregated settlements/ neighbourhoods	critical problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Housing in informal or illegal settlements/ neighbourhoods	significant problems	understood with limitations	adequate but room for improvement	some targets but not relevant
Exposure to hazardous factors (living in areas prone to natural disasters or environmentally hazardous areas)	critical problems	understood with limitations	present but insufficient	some targets but not relevant
Limited or lacking access to public transport	significant problems	understood with limitations	present but insufficient	some targets but not relevant
Limited or lacking internet access (e.g., public internet access points in deprived areas, areas not covered by broadband internet)	significant problems	irrelevant	absent	absent
Limited or lacking access to green spaces	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Roma excluded from environmental	significant problems	irrelevant	absent	absent

democracy				
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Social protection

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
High at-risk-of-poverty rate and material and social deprivation	critical problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Income support programmes fail to guarantee an acceptable level of minimum income for every household	critical problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Limited access to income support schemes (low awareness, barrier of administrative burdens, stigma attached)	significant problems	identified and analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement
Ineffective eligibility rules (well-designed means-testing ensures that those who need support can get it; job-search conditions ensure the motivation for returning to work)	minor problems	irrelevant	absent	absent
Low flexibility of income support programmes for addressing changing conditions of the household	minor problems	understood with limitations	adequate but with room for improvement	adequate but with room for improvement
Discrimination by agencies managing income-support programmes	minor problems	irrelevant	adequate but with room for improvement	adequate but with room for improvement
Risk of municipalities misusing income support to buy votes	irrelevant	irrelevant	absent	absent

Social services

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Limited quality, capacity and comprehensiveness of help provided by social services	significant problems	mentioned but not analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement
Limited access to social services: low awareness of them, low accessibility, (e.g., due to travel costs) or limited availability	significant problems	identified and analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement
Services providers do not actively reach out to those in need	significant problems	understood with limitations	present but insufficient	some targets but not relevant
Limited ability of social services to effectively work together with other agencies (e.g., public employment service) to help clients	significant problems	irrelevant	present but insufficient	present but insufficient
Discrimination by social service providers	significant problems	understood with limitations	adequate but room for improvement	adequate but room for improvement
Lack of adequacy of programmes for addressing indebtedness (providing counselling and financial support)	minor problems	irrelevant	absent	absent

Child protection

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Child protection not considered in the NRSF	minor problems	understood with limitations	adequate but room for improvement	some targets but not relevant
Specific vulnerability of Roma children as victims of violence not considered	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant

Segregated or discriminatory child-protection services provided to Roma	irrelevant	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Activities aimed at strengthening parental responsibility and skills not available or not reaching out to Roma parents	irrelevant	irrelevant	absent	absent
Illegal practices of child labour	minor problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Large-scale and discriminatory placement of Roma children in early childhood care institutions	minor problems	irrelevant	absent	some targets but not relevant
Persistence of large-scale institutions rather than family-type arrangements	irrelevant	irrelevant	absent	absent
Early marriages	minor problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Barriers to children's registration; statelessness	irrelevant	irrelevant	absent	absent
Biassed treatment of Roma youth by security and law enforcement	significant problems	irrelevant	absent	absent

Promoting (awareness of) Roma arts, culture, and history

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Poor or lacking awareness of the general population of the contribution of Roma art and culture to national and European heritage	significant problems	understood with limitations	adequate but with room for improvement	adequate but with room for improvement
Exclusion of Roma communities from national cultural narratives	critical problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Romani history and culture not included in school curricula and textbooks for both Roma and non-Roma students	critical problems	understood with limitations	present but insufficient	adequate but with room for improvement
Lack of inclusion of Romani language in schools, and development of necessary educational materials and resources for Romani language preservation and teaching	irrelevant	irrelevant	absent	absent
Lack of memorialisation of Roma history through establishing monuments, commemorative activities, and institutionalising dates relevant to Roma history	significant problems	mentioned but not analysed sufficiently	present but insufficient	adequate but with room for improvement

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