



Guidance
for departments
responsible
for programming
EU Cohesion
Funds in Member
States and the EU

Checklist for the **Effective Inclusion** of **Roma** **interventions** within **EU** **Cohesion Funds** **programming** **2021-2027**

As it has been recognised by the EU, Roma exclusion and discrimination are a persisting reality. The EU Funds 2021-2027, in particular the ESF+ and the ERDF, foresee various instruments that Member States can use to address this key challenge in their country. During the period 2014-2020, the EURoma Network has observed some important progress in the use of EU Structural and Investment Funds to promote social inclusion, equal opportunities and non-discrimination of Roma. Nonetheless, often Member States have not used all their potential resources (e.g. not programming long-term and large-scale measures; little use of complementarity between ESF and ERDF; limited alignment with the EU Framework and National Roma Integration Strategies' objectives; limited connection with mainstream policies) thus measures implemented have had little impact despite the efforts invested.

The new programming period 2021-2027 reinforces the importance of using EU Funds to address challenges related with

Roma equality and inclusion, thus it encourages Member States not only to programme specific measures but also to improve their effectiveness. It is essential to fully align the next EU Cohesion Funds' programming with the new challenges and priorities established in the new [EU Roma Strategic Framework for equality, inclusion and participation for 2020 - 2030](#).

Therefore, the purpose of this document is to offer guidance to EU, national & regional departments responsible for programming EU Cohesion Funds, especially ESF+ and ERDF. This document provides recommendations on how to set adequate basis in the programming documents, mainly the Partnership Agreement and the EU Cohesion Funds programmes to ensure that measures implemented in the future have a real impact and contribute to reducing Roma exclusion and discrimination effectively. It encourages Member States to go a step further by introducing improvements that were not implemented in the period 2014-2020, thus

learning from what has worked well and what has not worked so well.

Please note that this is a document under construction based on the 2018 Commission proposals for EU Cohesion Funds regulations thus it is a living document that will be updated once the final versions are adopted.

A quick overview of the contents



Why do we think this checklist is important in the current context?

- ➔ Roma exclusion and discrimination are unfortunately a persisting reality thus it remains an important challenge in EU Member States
- ➔ Member States have the responsibility of ensuring that Roma have equal access to rights and are not discriminated against in line with EU regulations
- ➔ During the period 2014-2020, the use of ESI Funds to address challenges related with Roma exclusion and discrimination has progressed but there is still scope for improvement in many Member States in line with EU policies
- ➔ The new programming period 2021-2027 offers the opportunity to progress on what has not been achieved during the period 2014-2020. EURoma proposes to move forward towards a more effective programming that makes a real difference
- ➔ The socio-economic integration of marginalised communities such as the Roma has been included as one of the specific objectives of the future ESF+ to support Member States to address this challenge
- ➔ The ERDF Specific Objective 4.3 aims at *increasing the socio-economic integration of marginalised communities, migrants and disadvantaged groups, through integrated measures including housing and social services*

Who is this guidance & checklist useful for?



This guidance & checklist has been conceived to support departments responsible for programming EU Cohesion Funds 2021-2027 to better programme the use of these funds so as to make real progress in Roma equality and inclusion in line with the EU Recommendations

How can departments responsible for programming EU Cohesion Funds 2021-2027 ensure that ESF+ and ERDF contribute to Roma equality and inclusion more effectively?



A greater and explicit commitment with social inclusion, equal opportunities and non-discrimination of Roma by Member States when planning EU Cohesion Funds



A higher alignment of measures programmed with EU regulations and recommendations and particularly with the challenges and objectives identified in the NSPF, EU Semester and CSRs



A better combination of mainstream and target approach to Roma equality and inclusion to ensure sustainability

- Principle no. 2: Explicit but not exclusive targeting
- Principle no. 4: Aiming for the mainstream



More ambitious measures that allow Member States to plan and implement long-term and large-scale programmes



More regional programmes that foresee measures under the Specific Objective on Roma equality and inclusion in line with the NSPF's objectives and adapted to the challenges of each territory



Increase the programming of integrated measures aligned with the NSPF's objectives and CSRs, Country Report challenges and the EU Semester

Checklist to ensure programming documents contribute to Roma equality and inclusion more effectively

- ➔ More comprehensive and integrated interventions aimed at Roma families, children, young people, women and EU mobile Roma are programmed
- ➔ More comprehensive and long-term integrated measures that combine ESF+ with ERDF are programmed, reinforcing the complementarity use of these funds
- ➔ A higher involvement of the National Roma Contact Points, Equality Bodies and Roma Civil Society Organisations in the programming phase (and entire management cycle) of EU Cohesion Funds 2021-2027 through adequate and quality participatory processes
- ➔ Strengthening the administrative capacity of stakeholders for managing EU funds for Roma equality and inclusion

➔ **What will be the contribution of EU Cohesion Funds 2021-2027 in my country to achieve Roma equality and inclusion?** 

The Partnership Agreement

- ➔ How can the PA contribute to a greater and explicit commitment with social inclusion, equal opportunities and non-discrimination of Roma?
- ➔ How can the PA contribute to better align its objectives with EU regulations and recommendations and its NSPF?



- How can the PA contribute to increase the use of complementarity between ESF+ and ERDF for targeted measures to promote social inclusion, equal opportunities and non-discrimination of Roma?

ESF+ Programmes

- How can the ESF+ contribute to a greater and explicit commitment with social inclusion, equal opportunities and non-discrimination of Roma?
- How can the ESF+ contribute to better align its objectives with EU regulations and recommendations and its NSPF?
- How can the ESF+ foster the combination of mainstream and target approach to Roma equality and inclusion to ensure sustainability
- How can the ESF+ programme more ambitious measures to ensure that long-term and large-scale measures will be implemented?
- How can the ESF+ increase the programming of integrated measures aligned with the NSPF's objectives and CSRs and Country Report challenges?
- How can ESF+ programmes contribute to increase the use of complementarity between ESF+ and ERDF for targeted measures to promote social inclusion, equal opportunities and non-discrimination of Roma?



ERDF Programmes

- How can the ERDF contribute to a greater and explicit commitment with social inclusion, equal opportunities and non-discrimination of Roma?
- How can the ERDF foster the combination of mainstream and target approach to Roma equality and inclusion to ensure sustainability?
- How can ERDF programmes contribute to increase the use of complementarity between ESF+ and ERDF for targeted measures to promote social inclusion, equal opportunities and non-discrimination of Roma?



Other key recommendations

- How can departments responsible of EU Cohesion Funds 2021-2027 contribute to programme more ambitious measures for Roma equality and inclusion?
- How can departments responsible of EU Cohesion Funds promote that more regional programmes foresee measures under the Specific Objective on Roma equality and inclusion in line with the NSPF's objectives?
- How can departments responsible of EU Cohesion Funds increase the involvement of the NRCP and Roma CSOs in the programming (and entire management cycle) of EU Cohesion Funds through adequate and quality participatory processes?

Why do we think this **checklist** is **important** in the **current context**?

Roma exclusion and discrimination are unfortunately a persisting reality thus it remains an important challenge in EU Member States

The latest study on Roma based on the [Second European Union Minorities and Discrimination Survey](#) from the Agency of Fundamental Rights of the EU shows persisting inequalities that need to be tackled:





Lower levels of access to health services and higher levels of long-term health problems; although data shows this varies among countries.



Less access to decent housing: a substantial proportion of Roma live in households without access to needed public utilities and basic housing amenities. This puts them at risk of severe housing deprivation.

Moreover, as the recent report published by the Commission “[Overview of the impact of coronavirus measures on the marginalised Roma communities in the EU](#)” highlights, the pandemic will have a mid-term socio-economic impact that on Roma, being at a higher risk of being hit the hardest, contributing to further inequalities.

In this context, the European Commission has adopted the new [EU Roma Strategic Framework](#) that includes a [Proposal](#)

[for a Council Recommendation on Roma equality, inclusion and participation 2020-2030](#) as it recognises that Roma face antigypsyism, discrimination and socio-economic exclusion in their daily lives. Overall, since 2011, progress has been limited, thus *Europe has to address more effectively these inequalities to ensure that Roma can make full use of their potential to contribute to the economy, social protection systems and society at large.*

Why it is so important to combat Roma exclusion and discrimination?

- ✓ It ensures access to human rights
- ✓ It reinforces European values
- ✓ It prevents an important loss of human capital
- ✓ It reduces welfare dependence
- ✓ It contributes to increase labour supply and tax revenues

Member States have the responsibility of ensuring that Roma have equal access to rights and are not discriminated against in line with EU regulations



Treaty of the European Union



Charter of Fundamental Rights
(Article 21)



Directive 2000/43 implementing
the principle of equal treatment
between persons irrespective of
racial or ethnic origin



EU Roma Strategic Framework
for equality, inclusion and
participation for 2020-2030
including a (proposal) Council
Recommendation for Roma
equality, inclusion and participation



European Semester (Country-
Specific Recommendations &
Country Reports Annex D (when
applicable)



Treaty of the European Union (article 2)

The Union is founded on the values of respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights, including the rights of persons belonging to minorities. These values are common to the Member States in a society in which pluralism, non-discrimination, tolerance, justice, solidarity and equality between women and men prevail.



Charter of Fundamental Rights (article 21)

1. Any discrimination based on any ground such as sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation shall be prohibited.



Directive 2000/43 (article 2)

The principle of equal treatment shall mean that there shall be no direct or indirect discrimination based on racial or ethnic origin.



EU Roma Strategic Framework

A renewed commitment to Roma equality, inclusion and participation at both European and national level with seven objectives at the EU level for the period up to 2030.



European Semester

Provides a framework for the coordination of economic policies across the EU. It allows EU countries to discuss their economic & budget plans and monitor progress throughout the year. It includes Country-Specific Recommendations (CSRs) that give guidance to Member States on what can realistically be achieved in the next 12-18 months to make growth more sustainable, inclusive and stronger. In several countries, CSRs include recommendations related with Roma equality, inclusion and participation. In others, explicit mentions to Roma equality are included in Annex D of the country report.

2030 Agenda For Sustainable Development & the Sustainable Development Goals

The 2030 Agenda for Sustainable Development and its 17 Sustainable Development Goals (SDGs), adopted by the United Nations (UN) in September 2015, have given a new impetus to global efforts for achieving sustainable development. The EU, in coordination with its Member States, is committed to support the implementation of the 2030 Agenda and to strive towards a sustainable future for all. The EU's answer to the 2030 Agenda is outlined in the 22 November 2016 European Commission's Communication "[Next steps for a sustainable European future - European action for sustainability](#)". In this sense, the European Union is linking the SDGs with the European Semester.

The 10 common basic principles on Roma inclusion

[Link to the document](#)

- 1. Constructive, pragmatic and non-discriminatory policies**
- 2. Explicit but not discriminatory targeting**
- 3. Inter-cultural approach**
- 4. Aiming for the mainstream**
- 5. Awareness of the gender dimension**
- 6. Transfer for evidence-based policies**
- 7. Use of European Union instruments**
- 8. Involvement of regional and local authorities**
- 9. Involvement of civil society**
- 10. Active participation of the Roma**

The new EU Roma Strategic Framework for equality, inclusion and participation for 2020-2030 calls for *more* coherence between EU policy support, legal and funding instruments mobilised and aligned towards Roma equality and inclusion thus Member State *should mobilise EU funds for Roma equality, inclusion and participation.*

The EU Roma Strategic Framework sets out several targets on minimum progress to be achieved by 2030 and provides guidance to EU Member States on how to do this.

Education → → → →

Employment → → →

Housing → → → → →

Healthcare → → → →

Preventing → → → →
antigypsyism
& discrimination

Reducing poverty →
& exclusion

Participation → → →

EU
Funds

ESF+
2021-2027

ERDF
2021-2027

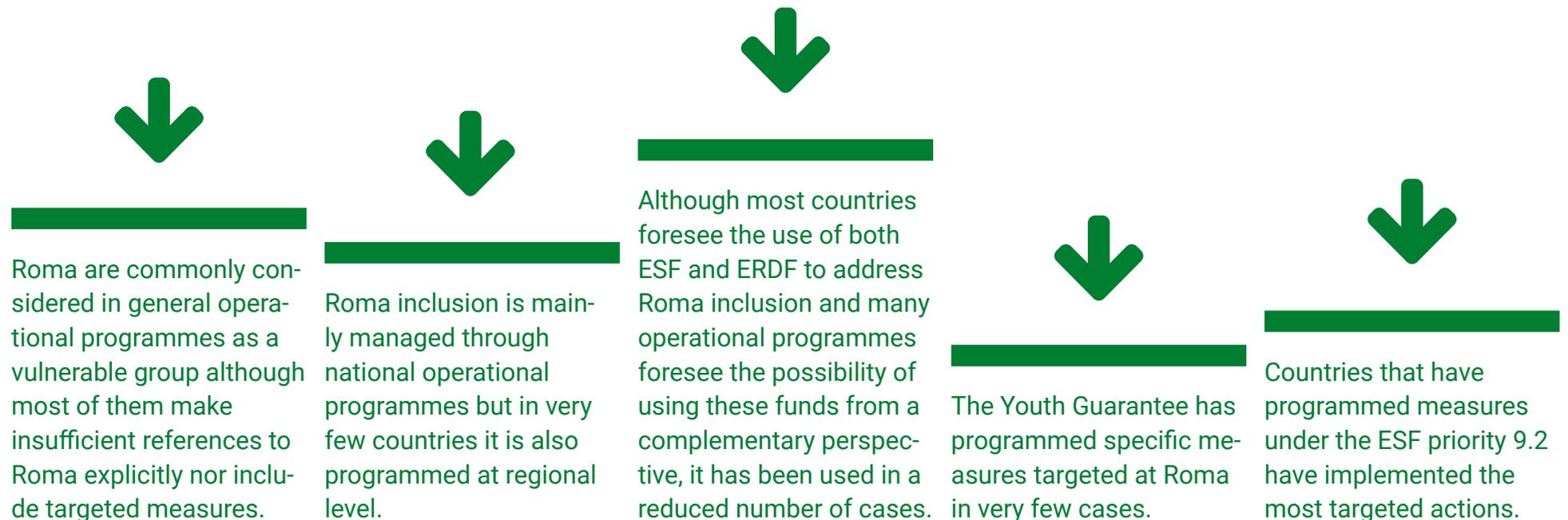
Next
Generation
EU

During the 2014-2020 period, the use of ESI Funds to address challenges related with Roma exclusion and discrimination has progressed but there is still scope for improvement in many Member States in line with EU policies

Several documents and reports prepared by [EURoma Network](#) show that EU Structural Funds have an important capacity and potential to contribute to social inclusion, equal opportunities and non-discrimination of Roma thus during the period 2014-2020 the EU and many Member

States have encouraged EU Structural Funds management units to programme and implement this type of measures.

As a result, EURoma has observed the following trends:





Although operational programmes incorporate actions addressing the four key fields identified in the EU Recommendation, interventions mainly focus on employment and education. In fact, measures are not always in line with the NRIS' objectives.



Despite having the possibility of programming long-term and large-scale measures, few countries have implemented this type of programmes.



Certain progress is observed in terms of the mechanisms, processes and methods for involvement of Roma in the management cycle. However, there is still room for progress: there is no systematic monitoring or evaluation of stakeholder involvement and major differences are perceived between the countries regarding the degree and quality of stakeholder participation and the forms it takes.



Lack of administrative capacity by beneficiaries to apply and manage EU funds.

The new 2021-2027 programming period offers the opportunity to progress on what has not been achieved during the 2014-2020 period. EURoma proposes to move forward towards a more effective programming that makes a real difference

Member States have now the opportunity to better use the future EU Cohesion Funds in addressing challenges related with Roma exclusion and discrimination at national and regional level

to make real progress towards the goals set in their future National Strategy Policy Framework (NSPF) in line with EU regulations and recommendations.

EURoma believes that Member States can make a real difference by taking stock of what has been done in the 2014-2020 period and committing to make the following **improvements**:



A greater and explicit commitment with social inclusion, equal opportunities and non-discrimination of Roma by Member States when planning EU Cohesion Funds



A higher alignment of measures programmed with EU regulations and recommendations and particularly with the challenges and objectives identified in the NSPF, EU Semester and CSRs



A better combination of mainstream and target approach to Roma equality and inclusion to ensure sustainability



More ambitious measures that allow Member States to plan and implement long-term and large-scale programmes



More regional programmes that foresee measures under the specific objective on Roma equality and inclusion in line with the NSPF's objectives and adapted to the challenges of each territory



Increase the programming of integrated measures aligned with the NSPF's objectives and CSRs, Country Report challenges and the EU Semester



More comprehensive and integrated interventions aimed at Roma families, children, young people, women and EU mobile Roma are programmed



More comprehensive and long-term integrated measures that combine ESF+ with ERDF are programmed, reinforcing the complementarity use of these funds



A higher involvement of the National Roma Contact Points (NRCP), Equality Bodies (EB) and Roma Civil Society Organisations (CSOs) in the programming phase (and entire management cycle) of EU Cohesion Funds through adequate and quality participatory processes



Strengthening the administrative capacity of stakeholders for managing EU funds for Roma equality and inclusion



It is of utmost importance for Member States to set coherent and consistent basis in the programming documents to ensure that future interventions aimed at promoting social inclusion, equal opportunities and non-discrimination of Roma funded by the future EU Cohesion Funds are effective and efficient.

For this reason, this document includes, in the following sections, practical recommendations that Member States can follow to achieve this.

Greater and **explicit commitment**

Higher **alignment of funds and policy**

Combination of **mainstream and target approach**

More **ambitious measures: long-term** and large-scale

More **regional programming**

Increase of **integrated measures** focused on **key investment areas**

Investment in **early interventions** and **priority groups**

Combination of **ESF+** with **ERDF**

Higher involvement of **NRCP & Roma CSOs**

Strengthening the **administrative capacity** of stakeholders for managing EU funds for Roma equality and inclusion

The socio-economic integration of marginalised communities such as the Roma has been included as one of the Specific Objective (viiiia) of the future ESF+ to support Member States to address this challenge

The Regulation laying down the common provisions establishes a series of enabling conditions, among them, a National Roma Integration Strategy (NRIS, future NSPF) linked with the Political Objective 4 *A more social Europe by implementing the European Pillar of Social Rights* and the Specific Objective established in article 4: (viiiia) *Promoting socio-economic integration of marginalised communities such as the Roma.*

Fulfilment criteria of the enabling condition on NSPF

NSPF should include:

- ✓ Measures to accelerate Roma integration, prevent and eliminate segregation, taking into account the gender dimension and situation of young Roma, and sets baseline and measurable milestones and targets
- ✓ Arrangements for monitoring, evaluation and review of the NSPF
- ✓ Arrangements for mainstreaming of Roma inclusion at regional and local level
- ✓ Arrangements for ensuring that its design, implementation, monitoring and review is conducted in a close cooperation with the Roma civil society and all other relevant stakeholders, including at the regional and local levels

In addition, the ESF+ regulation highlights that this fund should contribute to address social challenges faced by the EU, *in particular those related to social exclusion of marginalised groups including Roma.*



Whereas (18)

The ESF+ should support Member States' efforts to tackle poverty with a view to breaking the cycle of disadvantage across generations and promote social inclusion by ensuring equal opportunities for all, tackling discrimination and addressing health inequalities. This implies mobilising a range of policies targeting the most disadvantaged people regardless of their age, including children, marginalised communities **such as the Roma.**

The ERDF Specific Objective 4.3 aims at increasing the socioeconomic integration of marginalised communities, migrants and disadvantaged groups, through integrated measures including housing and social services

According to article 2.1.b) iii) of the ERDF and Cohesion Fund regulation, Member States have the possibility of programming the following interventions:



Article 2 Specific Objectives for the ERDF and the Cohesion Fund

Specific Objective 4.3 ***Increasing the socio-economic integration of marginalised communities, migrants and disadvantaged groups, through integrated measures including housing and social services.***

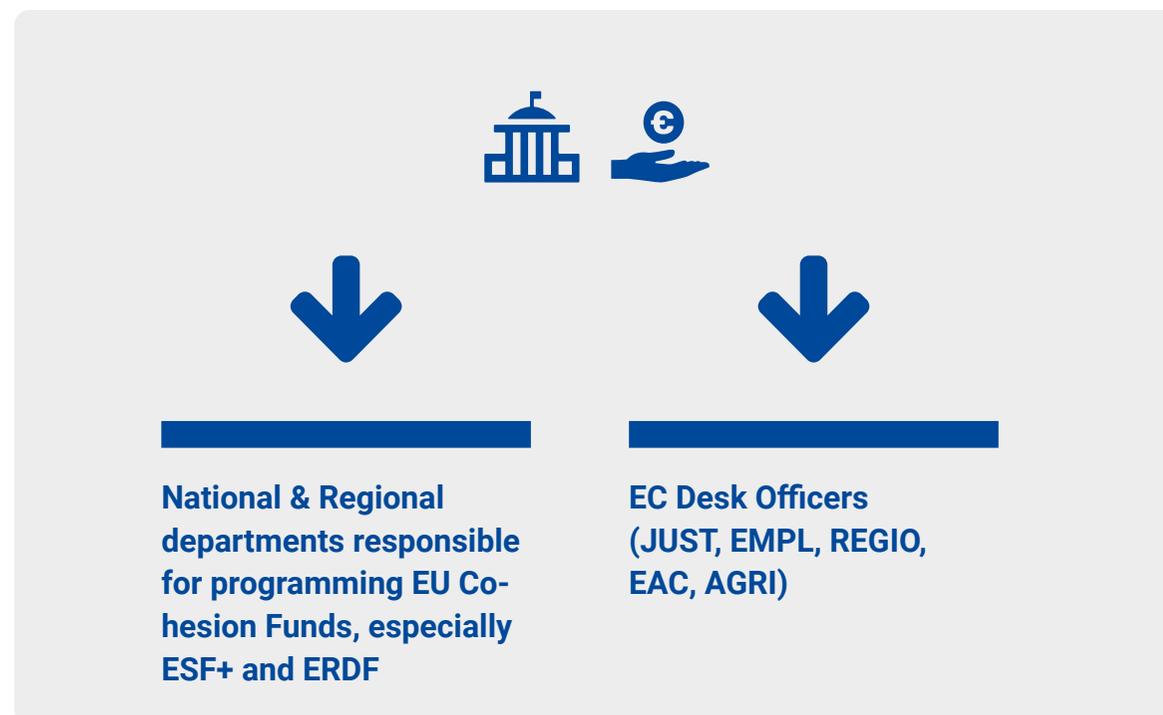
Moreover, [Annex I](#) of the Regulation laying down the common provisions foresees a specific intervention field code that can be used for this type of interventions.

090 | Housing infrastructure (other than for migrants, refugees and persons under or applying for international protection)

Who is this guidance & checklist useful for?

This guidance & checklist has been conceived to support departments responsible for programming EU Cohesion Funds 2021-2027 to better programme the use of these funds so as to make real progress in Roma equality and inclusion in line with the EU Recommendations

Thus, this guidance and checklist is mainly addressed to:



In addition, it can also be useful to other key partners or actors involved in the programming phase of these funds:

- National Roma Contact Points
- Equality Bodies
- Departments responsible for Roma policies in Member States

How can departments responsible for programming **EU Cohesion Funds 2021-2027** ensure that **ESF+** and **ERDF** **contribute to Roma equality** and inclusion more effectively?

The new programming period 2021-2027 offers Member States the opportunity to better use future EU Cohesion Funds in addressing challenges related with Roma exclusion and discrimination at national and regional level thus we encourage Member States to use all their potential to reach the goals set in their NSPF in line with EU regulations and recommendations.

A greater and explicit commitment with social inclusion, equal opportunities and non-discrimination of Roma by Member States when planning EU Cohesion Funds

As mentioned above, Roma exclusion and discrimination are a persisting reality although the situation varies between Member States. Nonetheless, improvements in this area requires a joint commitment to progress towards

the common targets established in the EU Roma Strategic Framework for equality, inclusion and participation for 2020-2030. In this new framework, the European Commission recognises the need for more intensive commitments and EU

support, in particular the use of EU funds for both targeted action and inclusive mainstream reforms. Member States should therefore address the challenges related with Roma equality, inclusion and participation with the support of EU Funds, in particular through ESF+, especially Member States with challenges included in their Annex D and Country Specific Recommendations

Countries should particularly commit to include the Specific Objective (vi-

ia) Promoting socio-economic integration of marginalised communities such as the Roma related with Roma equality and inclusion when planning political objective 4 A more social Europe by implementing the European Pillar of Social Rights to ensure ESF+ and ERDF Management Units have an adequate framework to implement, monitor and evaluate measures in this area.

Recommendations

Benefits

1.

Adoption of an NSPF in line with the enabling conditions

Ensure the Member States adopt NSPF in line with the EU Roma Strategic Framework and that it fulfils the criteria set for the specific ESF+ enabling conditions.

It ensures the compliance with EU Cohesion Funds 2021-2027 regulation thus allowing the adoption of the Partnership Agreement

2.

Explicit reference to NSPF's objectives as one of the priorities within the political objective 4 *A more social Europe by implementing the European Pillar of Social Rights* both in the Partnership Agreement and the EU Cohesion Funds programmes, especially in ESF+ programmes.

It establishes an adequate framework to implement measures aimed at contributing to achieve the NSPF objectives as it will set the basis to assign a specific budget with its corresponding outputs/results indicators that can be monitored and evaluated.

3.

Select the *Specific Objective (viii) Promoting socio-economic integration of marginalised communities such as the Roma to programme measures linked with the NSPF*

Member States can also select the *Specific Objective (viii) Promoting socio-economic integration of third country nationals* to address challenges related with third country nationals Roma.

It will facilitate the programming of targeted measures connected with the NSPF's objectives designating a specific budget with its corresponding performance framework thus establishing specific outputs, results indicators and milestones to be achieved by 2024 and targets to be achieved by 2029.

It will allow to select key interventions fields related with Roma equality and inclusion as defined in [Annex I](#) of the Regulation laying down the common provisions:

- 090 | Housing infrastructure (other than for migrants, refugees and persons under or applying for international protection)
- 117 | Measures to improve access of marginalised groups such as the Roma to education, employment and to promote their social inclusion
- 118 | Support to the civil society working with marginalised communities such as the Roma

it will contribute to improve the data collection, monitoring and evaluation on the contribution of EU Cohesion Funds to Roma equality and inclusion.

It will allow to better promote integrated and innovative actions to foster Roma equality and inclusion thus encouraging policy experimentation and innovation to develop more effective and efficient Roma equality and inclusion public policies. It must be noted that this type of measures benefits from a higher EU co-funding rate (up to 95% according to article 13 of the ESF+ regulation).

It will also allow to better programme transnational actions to foster peer learning and exchange that gives the possibility of establishing mutual exchange projects between Member States or regions as well as transnational projects, especially with regards to the situation of Roma travellers.

A higher alignment of measures programmed with EU regulations and recommendations and particularly with the challenges and objectives identified in the NSPF, EU Semester and CSRs

According to the Regulation laying down the common provisions, EU Cohesion Funds shall support the policy objectives set out in article 4. Countries should include in the Partnership Agreement the selected policy objectives. Member States that include policy objective (d) “a more social Europe implementing the European Pillar of Social Rights” should explicitly refer to the challenges related to Roma exclusion and discrimination. This is especially important for countries that have specific references to this in their European Semester Country Report 2019 and in their Country-Specific Recommendations to ensure more coherence between EU

policy support, legal and funding instruments mobilised and aligned towards Roma equality and inclusion.

Member States should note that according to article 15 of the Regulation laying down the common provisions, EU Cohesion Funds should support the implementation of relevant Council Recommendations and support the implementation of Country-Specific Recommendation thus the European Commission could request a Member State to review and propose amendments to EU Funds planning documents to ensure this.



Article 15 Measures linking effectiveness of Funds to sound economic governance

1. The Commission may request a Member State to review and propose amendments to relevant programmes, where this is necessary to support the implementation of relevant Council Recommendations.

Such a request may be made for the following purposes:

- (a) to support the implementation of a relevant Country-Specific Recommendation adopted in accordance with Article 121(2) TFEU and of a relevant Council recommendation adopted in accordance with Article 148(4) TFEU, addressed to the Member State concerned;

Moreover, in order to increase effectiveness of the funds invested, it is vital to prepare an adequate situation analysis so that measures programmed are coherent with current needs and with the NSPF’s objectives. In this sense, the studies carried out by the EU Fundamental Rights Agency (FRA) or other national research or statistical agencies can provide consistent information to elaborate a valuable needs analysis.

Countries that should programme measures under the Specific Objective (viiiia):



Recommendations

Benefits

4.

Identification of challenges

Include a reference to the challenges related with Roma equality, inclusion and fight against discrimination in the programming documents (Partnership Agreement and programmes) making an explicit reference to CSRs and the country report, when applicable, and to the challenges identified by the European Commission in the [Report on the implementation of National Roma Integration Strategies 2019](#).

It encourages a better coherence between the challenges identified in the country and the design of future measures and complies with EU regulations and recommendations.

5.

Consistent needs analysis

Include a consistent needs-analysis on Roma exclusion and discrimination detailing what needs will be prioritised ensuring that these include education and employment, and to other challenges related with housing, health, discrimination and antigypsyism prevention. It is recommended to refer to the information collected under the new [EU Roma Strategic Framework for equality, inclusion and participation](#) (baseline values for EU headline indicators), the surveys from the FRA foreseen in 2020-2021, 2024-25 and 2028-2029, as well as other official and consistent data available at national or regional level.

It ensures that measures programmed under EU Cohesion Funds are consistent with the needs analysis of Roma and facilitate prioritisation, and it will also allow for better monitoring and evaluation of results and impact as it will have a base line to analyse the measures' effectiveness.

6.

Prioritising key priorities aligned with NSPF

Agreeing key priorities with the NRCP to establish what will be the contribution of EU Cohesion Funds to the NSPF's objectives and CSRs or Country Report challenges to ensure that measures programmed especially under the Specific Objective (viiiia) *Promoting socio-economic integration of marginalised communities such as the Roma* contribute to the selected priorities.

It ensures EU Cohesion Funds will contribute to achieving NSPF results and impact, as well as guaranteeing a more coordinated intervention at national, regional and local level.

A better combination of mainstream and target approach to Roma equality and inclusion to ensure sustainability

According to the new EU Roma Strategic Framework that includes a Proposal for a Council Recommendation on Roma equality, inclusion and participation 2020-2030, all National Roma Strategic Frameworks should have common features, among them the combination of mainstreaming and explicit, but not exclusive Roma targeting. National Roma Strategic Frameworks should combine mainstreaming and explicit but not exclusive targeting, ensuring that

mainstream services are inclusive and providing additional targeted support to promote effective equal access for Roma to rights and services. They should serve as planning instruments for using national and EU Cohesion Funds 2021-2027 for Roma-targeted action and inclusive mainstream reform.

Experience and best practice¹ show that opting for a complementary approach that combines targeted measures

linked with mainstreaming Roma inclusion and equality with thematic public policies is the most effective investment. In fact, the absence of these two complementary approaches has the risk of limiting the effectiveness of social and Roma policies; moreover, it may result in an unintended situation causing further exclusion.²

¹ Joint Research Centre, 2019, [A meta-evaluation of interventions for Roma inclusion](#)

² EURoma, 2013, [How to mainstream Roma inclusion in general programmes, projects and interventions](#)

Embedding targeted interventions in mainstream policy and legal frameworks to ensure that they remain temporary and promote effective equal access of Roma to mainstream services, instead of creating permanent parallel structures is one of the success factors for planning, implementation and monitoring Roma inclusion interventions identified by the EC Report on the implementation of national Roma integration strategies – 2019.³

It is worth highlighting that ‘Explicit but not exclusive targeting’ and ‘aiming for the mainstream’ are among the 10 Common Basic Principles for Roma Inclusion (namely principles 2 and 4 respectively).⁴

³ European Commission, 2019, *Report on the implementation of national Roma integration strategies – 2019*

⁴ European Union, 2009, *Council Conclusions on Inclusion of the Roma 2947th Employment, Social Policy, Health and Consumer Affairs Council meeting Luxembourg, 8 June 2009*

Principle no. 2: Explicit but not exclusive targeting

‘Explicit targeting’ means focusing on Roma and implementing measures specifically tailored to their needs or focusing explicitly on disadvantaged groups including Roma.

A combined approach of targeted and mainstream measures in the programming of EU Cohesion Funds 2021-2027 could result in:



A TARGET APPROACH IS JUSTIFIED WHEN there are substantial disadvantages or an important gap between Roma and the general population in the access to mainstream services. In these cases, the goal of target measures is to compensate disadvantages and facilitate effective and equal access of Roma to rights and mainstream services.

Principle no. 4: Aiming for the mainstream

Mainstreaming means considering the needs of the Roma in fields or areas covered by different thematic policies aimed at all citizens (where relevant).



A MAINSTREAM APPROACH IS JUSTIFIED WHEN universal services are insufficiently inclusive with Roma or do not reach them. In these cases, adjustments and adaptations need to be put in place in order for universal services to be inclusive with Roma.

Programming targeted measures

under the Specific Objective (viii) *Promoting socio-economic integration of marginalised communities such as the Roma*

or within other ESF+ objectives as long as they are **linked with the NSPF**. Additionally, it is worth highlighting that targeted

measures that are directly connected, designed and implemented under the framework of mainstream policies are more

effective and contribute to transitional processes that leads to guaranteeing the access to mainstream services.

Specific Objectives where MS are encouraged to programme targeted measures

ESF+ - Policy Objective 4

Article 4 of the ESF+ Regulation

- ✓ (i) Improving access to employment and activation measures of youth in particular (including the Youth Guarantee)
- ✓ (ii) Modernising labour market institutions and services to anticipate skills and ensure tailor-made support
- ✓ (iii) Promoting women's labour market participation
- ✓ (iv) Improving the quality, inclusiveness, effectiveness and labour market relevance of education and training systems
- ✓ (v) Promoting equal access to and completion of quality and inclusive education and training
- ✓ (vi) Promoting lifelong learning
- ✓ (vii) Fostering active inclusion
- ✓ (viii) **Promoting socio-economic integration of marginalised communities such as the Roma**
- ✓ (viii) **Promoting socio-economic integration of third country nationals**
- ✓ (ix) Enhancing the equal and timely access to quality, sustainable and affordable services
- ✓ (x) Promoting social integration of people at risk of poverty or social exclusion
- ✓ (xi) Addressing material deprivation

ERDF

Article 2 of the ERDF Regulation

Policy Objective 1

- ✓ (iv) Developing skills for smart specialisation, industrial transition and entrepreneurship

Policy Objective 2

- ✓ (i) Promoting energy efficiency measures

Policy Objective 3

- ✓ (i) Enhancing digital connectivity

Policy Objective 4

- ✓ (i) Enhancing the effectiveness of labour markets and access to quality employment through social innovation and developing infrastructure
- ✓ (ii) Improving access to inclusive and quality services in education, training and life-long learning through developing infrastructure including by fostering resilience for distance and on-line education and training

- ✓ (iii) Increasing the socioeconomic integration of marginalised communities, migrants and disadvantaged groups, through integrated measures including housing and social services

- ✓ (iv) Ensuring equal access to health care and fostering resilience of health systems

- ✓ (v) Enhancing the role of culture and tourism in economic development, social inclusion and social innovation

Policy Objective 5

- ✓ (i) Fostering the integrated social, economic and environmental development, cultural heritage and security in urban areas

- ✓ (ii) Fostering the integrated social, economic and environmental local development, cultural heritage and security, including for rural and coastal areas also through community-led local development

Recommended targeted actions that can be programmed with ESF+

- ✓ Targeted long-term and integrated measures to prevent and reduce school failure and early-school leaving among Roma girls and boys
- ✓ Targeted long-term measures to prevent and reduce school segregation
- ✓ Targeted long-term and integrated measures to promote entrepreneurship, social economy or self-employment among Roma. Measures to particularly tackle the precarious sectors, such as street vending among others, where a large part of Roma work
- ✓ Targeted long-term and integrated measures to promote Roma equality among men and women and foster women empowerment
- ✓ Targeted long-term measures to promote equal treatment and non-discrimination of Roma, with special attention to antigypsyism
- ✓ Measures aimed at preventing and providing assistance to victims of discrimination on the ground of racial and ethnic origin, with explicit reference to Roma
- ✓ Training and sensitisation of public services personnel, especially social services, education, employment, health and housing, on the specific needs/problems faced by Roma people
- ✓ Long-term and integrated measures to reduce or prevent poverty and the exclusion of families, with special attention to child poverty
- ✓ Promote transnational cooperation for searching for common solutions related to Roma equality, inclusion and non-discrimination between Member States, including programmes to address the particular challenges of EU mobile Roma
- ✓ ...

Recommended targeted actions that can be programmed with ESF+ & ERDF (complementarity)

Member States can programme the following actions under the ERDF Specific Objective 4.3: *Increasing the socio-economic integration of marginalised communities, migrants and disadvantaged groups, through integrated measures including housing and social service:*

- ✓ Regeneration of deprived urban and rural areas
- ✓ Shift from institutional to community-based services
- ✓ Addressing educational and housing segregation
- ✓ Integration of people with a migrant background

Programming this type of measures is ideal to make investments that require the involvement of various thematic areas such as education, health, employment, housing, anti-discrimination, etc. thus it is recommended to use instruments that allow this interconnection such as establishing the complementarities between EU funds, multi-fund operational programmes, territorial instruments, etc.

When it comes to address Roma needs, the following type of activities are recommended:

- ✓ Promote innovative actions and experimentation aimed at promoting Roma equality and inclusion, with special attention to those most at risk of poverty
- ✓ Targeted long-term and integrated measures to reduce poverty and exclusion of families with a special focus on child poverty
- ✓ Targeted medium and long-term measures to prevent antigypsyism and fight against discrimination

Ensuring that measures programmed under other Specific Objectives are inclusive by

making **explicit reference** to Roma as a priority vulnerable target group and foreseeing safeguards, positive actions or adaptations to ensure that Roma can also benefit from the programmed measures. It is vital to ensure that **Roma needs** are reflected in mainstream policies. In-

clusion of Roma happens when mainstream policies are responsive to their specific needs. When this approach is selected it is very important to ensure that ESF+ and ERDF units select adequate **indicators** in the performance framework to facilitate monitoring and evaluation. During

the period 2014-2020, this has been an important weakness that has not allowed to measure progress nor effectiveness. **Specific indicators** related with Roma equality and inclusion has been a challenge in many Member States as in some cases it presents data protection

problems. Nonetheless, some countries have overcome this difficulty by establishing adequate processes or have involved specialised NGOs in the implementation of the measures as they normally have a better reporting capacity (e.g. Spain).

- ✓ Targeted long-term and integrated measures to promote access to early-childhood education
- ✓ Targeted long-term and integrated measures to promote access to housing and other key services (social and health services) among Roma.
- ✓ Targeted long-term and integrated measures to address the economic and social consequences of COVID-19 among Roma

Recommendations

Programme targeted measures

Programme targeted measures under ESF+ and ERDF Specific Objectives, preferably under specific objective (viii) on Roma equality and inclusion, but also in other ESF+ or ERDF specific objectives.

Benefits

It allows to programme target measures to address the specific needs and disadvantages of Roma in line with Principle 2 “Explicit but not exclusive targeting” of the 10 Common Basic Principles for Roma Inclusion.⁵

⁵ European Union, 2009, *Council Conclusions on Inclusion of the Roma 2947th Employment, Social Policy, Health and Consumer Affairs Council meeting Luxembourg, 8 June 2009*

Programming targeted measures does not necessarily need to be done through the specific objective (viii) though it is recommendable as it allows a more comprehensive programming. However, targeted measures can be programmed under other Specific Objectives as it can enhance the connection with mainstream policies, services or measures. For instance, programming targeted measures in Specific Objective 1 under the framework of the Youth Guarantee will allow to implement measures adapted to the need of Roma young people at the same time as guaranteeing they have access to mainstream programmes. In this sense, these types of measures contribute to the design of inclusive mainstream measures as it removes possible barriers or establishes mechanisms that ensure access to vulnerable groups such as Roma.

In addition, programming targeted measures will allow to select key interventions fields related with Roma equality and inclusion, as defined in [Annex I](#) of the Regulation laying down the common provisions:

097 Measures to improve access to employment

099 Specific support for youth employment

102 Measures to strengthen labour market institutions/services to assess skills needs and tailor-made assistance

108 Support for the development of digital skills

090 | Housing infrastructure (other than for migrants, refugees and persons under or applying for international protection)

117 | Measures to improve access of marginalised groups such as the Roma to education, employment and to promote their social inclusion

118 | Support to the civil society working with marginalised communities such as the Roma

Finally, programming targeted measures will contribute to a better monitoring and evaluation of the measure, as it will promote the use of the specific output indicator.

8.

Explicit mention to Roma in mainstream measures

Ensure that mainstream measures programmed under other ESF+ or ERDF Specific Objectives explicitly mention Roma as a vulnerable priority target group and that safeguards or adaptations are foreseen to guarantee they are inclusive.

It contributes to developing inclusive policies and measures thus fostering the use of mainstream services by Roma and avoiding the creation of segregated services, therefore complying with Principle 4 “Aiming for the mainstream” of the [10 Common Basic Principles](#) for Roma Inclusion.

9.

Ensure that ESF+/ERDF Units select an output indicator related with Roma beneficiaries and establish an adequate reporting mechanism in line with the guidance included in the ESF+ Annex on indicators: If data for these indicators is not collected from data registers, values on these indicators can be determined based on informed estimates by the beneficiary.

It facilitates monitoring and evaluation and will contribute to improve data collection on Roma equality and inclusion.

More ambitious measures that allow Member States to plan and implement long-term and large-scale programmes

Various studies and evaluations carried out in the period 2014-2020 show that the effectiveness or impact of measures and programmes aimed at reducing Roma exclusion and discrimination vary according to certain characteristics. In fact, these studies demonstrate that certain interventions have very limited impact or are less effective thus, the return of the investment is not efficient.

Experience shows these are frequent reasons for project failure:⁶

- **SHORT-TERM PERSPECTIVE** of projects and with a **LACK OF POLITICAL CONSENSUS** on sustainable changes
- **PERVERSE EFFECT OF SECTORIALISATION** Most projects and measures are sectorial and lack multidimensionality. This poor interconnection leads to scarce results and limited impact
- **LIMITED AND INADEQUATE USE OF EXISTING ECONOMIC RESOURCES AND LITTLE SYNERGIES** among different resources available
- **INADEQUATE INSTITUTIONAL SCHEMES** The system of coordination between the national, regional and local levels is inadequately defined and opaque in many cases
- **INABILITY TO CONVINCING PUBLIC OPINION** While public opinion has increasingly negative perceptions of Roma, it is not realistic to expect greater political commitment. The growing pressure of extremist political parties produces a negative atmosphere towards Roma
- **LACK OF ROMA-RELATED PROFESSIONAL CAPACITY** Poor knowledge on Roma culture and needs, social exclusion, intercultural competences, etc
- **POOR LEADERSHIP AND CAPACITY** Little guidance and practical support together with a lack of institutional ownership
- **GAP BETWEEN PLANNING AND IMPLEMENTATION** In most cases there is poor monitoring and evaluation to demonstrate progress in achieving results
- **ROMA POLICIES ORIENTED TO CONTROL AND SECURITY**

⁶ EURoma, 2013, [Tackling Roma Needs in the 2014-2020 Structural Funds Programming Period](#). Guide to improve the planning process.

Although some of these reasons have been addressed during the period 2014-2020, most of these trends remain a challenge thus the programming period 2021-2027 should be seen as an opportunity to encourage Member States to be more ambitious in the way measures are programmed to increase effectiveness and efficiency

to ensure that the investment of EU Cohesion Funds 2021-2027 has a higher social and economic return.

In this sense, it is highly recommendable to ensure that the programming documents encourage the implementation of national, regional and local long-term measures.

Recommendations

Benefits

10.

Long-term measures

Programme measures with a long-term timeframe so that actions are planned from a pluriannual perspective in line with the multiannual framework period avoiding as much as possible the implementation of measures with an annual or shorter timeframe. Overcoming Roma exclusion and discrimination requires long-term commitments and a comprehensive approach. Structural changes need time and real impact may not be seen for at least a generation.⁷

Interventions funded by EU Cohesion Funds 2021-2027 can be designed with a more ambitious timeframe so that they can efficiently respond to some of the structural challenges faced by Roma, avoiding focussing only in short-term needs.

This approach ensures that measures are given sufficient time, not only for implementation, but for planning, consultation, engaging stakeholders, building trust with communities, monitoring, evaluation and policy review, in line with the success factors identified in the EC Report on the implementation of national Roma integration strategies – 2019.

It also contributes to reducing administrative burden related with the initial and final phases of implementation, which are generally more intense in management and bureaucracy.

⁷ European Commission, 2018, *Communication from the Commission to the European Parliament and the Council: Report on the evaluation of the EU Framework for National Roma Integration Strategies up to 2020*

More regional programmes that foresee measures under the Specific Objective on Roma equality and inclusion in line with the NSPF's objectives and adapted to the challenges of each territory

EURoma has observed that in the period 2014-2020 Roma inclusion has mainly been managed through some National Operational Programmes and that only a small number of countries have programmed this type of measures also at regional level.

The evaluations carried out by the European Commission in the last

few years demonstrate the importance of encouraging also regional and local actors to implement measures that promote social inclusion, equal opportunities and non-discrimination of Roma. In fact, the conclusions from the EC "Report on the evaluation of the EU Framework for National Roma Integration Strategies up to 2020"⁸ highlights that *local*

governments often do not possess sufficient resources and expertise when it comes to fighting discrimination and promoting social inclusion. EU funds should be used to a larger extent to build local capacities and promote the development, implementation and monitoring of local strategies.

Recommendations

11.

Targeted measures under Specific Objective (viii) or other specific objective at regional level

Encourage the selection of the Specific Objective (viii) *Promoting socio-economic integration of third country nationals and of marginalised communities such as the Roma* in regional ESF+ programmes aligned with NSPF.

Benefits

It allows programming target measures to address the specific needs and disadvantages of Roma at regional or local level with a designated and performance framework thus encouraging a better alignment, connection and contribution to the NSPF and CSRs or Country Report challenges.

⁸ European Commission, 2018, *Communication from the Commission to the European Parliament and the Council: Report on the evaluation of the EU Framework for National Roma Integration Strategies up to 2020*

12.

Explicit reference to Roma in mainstream regional measures

Encourage the explicit reference to Roma needs in ESF+ or ERDF measures programmed at regional programming to ensure they are inclusive and contribute to reaching the NSPF's objectives.

It contributes to ensure EU Cohesion Funds 2021-2027 programmed at regional level are inclusive with Roma thus complying with Principle 4 "Aiming for the mainstream" of the 10 Common Basic Principles for Roma Inclusion.

Increase the programming of integrated measures aligned with the NSPF's objectives and CSRs, Country Report challenges and the EU Semester

The EC Report on the Implementation of National Roma Integration Strategies – 2019 highlights that *Intersectional, cross-sectoral, integrated approaches to tackle multiple discrimination and multi-dimensional exclusion* is one of the key success factors for planning, implementation and monitoring Roma inclusion interventions.

In fact, the EC mid-term review⁹ also reminds Member States that:

⁹ European Commission, 2017, *Communication from the Commission to the European Parliament and the Council: Midterm review of the EU framework for national Roma integration strategies*

Efforts should focus on a limited number of critical areas and targets, allowing for the combined use and aligned monitoring of targeted and mainstream policy, legal and funding tools.

Setting a limited number of specific national quantitative targets with indicators for selected inclusive reforms and major targeted interventions under each area could help to focus action and achieve a greater impact.

Local authorities' have a limited administrative capacity to implement sustainable integrated measures.

EU Roma integration goals in the key policy fields of education, employment, health and housing remain relevant, in order to accelerate the improvement of the situation of Roma communities.

13.

Recommendations

Integrated measures

Make full use of the Specific Objective (*viii*) *Promoting socio-economic integration of marginalised communities such as the Roma* to programme integrated measures, especially aimed at Roma living in extreme poverty as these interventions require a higher level of combination of territorial and group targeting in comprehensive interventions to ensure it can contribute to long-term change. In fact, the *Annex I of the Regulation laying down the common provisions* establishes a specific intervention code to this end:

090 | Housing infrastructure (other than for migrants, refugees and persons under or applying for international protection)

117 | Measures to improve access of marginalised groups such as the Roma to education, employment and to promote their social inclusion

Benefits

It allows to programme targeted integrated measures to address the intersectional and cross-sectoral needs of Roma in line with the new EU Roma Strategic Framework with the possibility of programming operations of strategic importance.

14.

Connection of integrated measures with mainstream policies

Increasing the connection of the above targeted integrated measures with mainstream measures funded through other ESF+ or ERDF Specific Objectives. This requires Member States to make explicit reference

It ensures that targeted interventions remain temporary and promote effective equal access of Roma to mainstream services, instead of creating permanent parallel structures, avoiding the creation of segregated services.

to the contribution of the planned integrated with the corresponding mainstream policy at national, regional or local level to ensure it is aligned with the NSPF's objectives.

More comprehensive and integrated interventions aimed at Roma families, children, young people, women and EU mobile Roma are programmed

The mid-term review carried out by the EC and published in 2017 found that the EU framework had limited capacity to deal with diversity among Roma. The gender dimension was found to be weak, with only some NSPF taking into account the specific vulnerabilities of women. A child-sensitive approach would have required more comprehensive strategies tackling children's needs including education, health and

housing policies, and in child protection. Fighting trafficking in human beings with child sensitivity and addressing the gender dimension is still a need. Multiple and intersectional discrimination is rarely addressed.¹⁰

Thus, the European Commission is insisting on the importance of reinforcing the gender dimension taking into account the specific vulnerabilities of women

as well as strengthening the child-sensitive approach through more comprehensive strategies tackling children's needs simultaneously in education, health and housing policies as well as in child protection.

¹⁰ European Commission, 2017, *Communication from the Commission to the European Parliament and the Council: Midterm review of the EU framework for national Roma integration strategies*

15.

Recommendations

Priority groups and early interventions

Ensure that both targeted and mainstream measures take into account the particular needs of Roma women, children and EU mobile Roma thus making a specific and explicit reference to them in the situation analysis on Roma included in the Partnership Agreement and EU Cohesion Funds programmes 2021-2027. When designing these type measures, it is particularly essential to pay special attention to critical life cycle transitions, prioritising preventing and early interventions.

Benefits

It aligns with the new EU Roma Strategic Framework that recommends Member States to focus particularly on women, children and EU mobile Roma and third country nationals, stateless Roma and Roma youth. Also, it must be noted that adopting a preventive approach has proven to be more cost-effective when it comes to generating long-term and sustainable change.

16.

Connection of integrated measures with mainstream measures

Programme the following type of targeted long-term and integrated measures under the Specific Objective (viii) *Promoting socio-economic integration of third country nationals and of marginalised communities such as the Roma:*

Roma equality among men and women.

Women empowerment, antigypsyism awareness and prevention and participation in social and political life.

Poverty and exclusion of families with a special focus on child poverty.

It allows to establish a performance framework to better monitor and evaluate the effectiveness and impact of the investment.

Participation of children and young people in social and political life.

Specific vulnerable situation of EU Mobile Roma with particular focus on children.

More comprehensive and long-term integrated measures that combine ESF+ with ERDF are programmed, reinforcing the complementarity use of these funds

The Regulation laying down the common provisions for 2021-2027 continues to foster the combined use of EU Cohesion Funds to improve complementarities and simplify implementation under the Investment for jobs and growth goal thus the Partnership Agreement. EU Cohesion Funds programmes should specify if this will be used for each of the selected policy objectives, taking into account that article 20 foresees that *the ERDF*

and the ESF+ may finance, in a complementary manner and subject to a limit of 10% of support from those Funds for each priority of a programme, all or part of an operation for which the costs are eligible for support from the other Fund on the basis of eligibility rules applied to that Fund, provided that such costs are necessary for the implementation.

In the period 2014-2020, the regulation introduced a new tool to improve

the effectiveness of the European Structural and Investment Funds as regards social inclusion, including that of Roma: the possibility of programming territorial and integrated approaches addressing the specific needs of geographical areas most affected by poverty and target groups at highest risk of social exclusion, facilitated by a multi-fund approach. EURoma has observed that although most countries foresaw this pos-

sibility, in practice it has been used in a reduced number of cases.

In the case of marginalised communities and individuals, significant and complex needs call for a **multi-dimensional, integrated approach combining investments in employment, education and training, healthcare and housing**. Within these policy areas, ESF+ and ERDF investments should be consistent and work in synergy with other EU

funds and programmes, including the RRF, SURE, EAFRD, AMF and InvestEU, in order to support social inclusion in an integrated manner.

17.

Recommendations

Complementarity of funds

Ensure that the Partnership Agreement and EU Cohesion Funds programmes allocates funds for ERDF and ESF+ under policy objective 4 to ensure that complementarity of funds or multi-fund measures to promote Roma equality and inclusion are not only possible but encouraged both at national and regional or local level.

Benefits

It allows to programme, implement and evaluate more effective and efficient long-term and integrated interventions aligned with NSPF's objectives and CSRs or Country Report challenges.

A higher involvement of the National Roma Contact Points, Equality Bodies and Roma Civil Society Organisations in the programming phase (and entire management cycle) of EU Cohesion Funds 2021-2027 through adequate and quality participatory processes

According to article 6 of the Regulation laying down the common provisions, EU Cohesion Funds 2021-2027 programming units should ensure that relevant actors are involved in the entire managing cycle. In this case, it is vital to involve NRCP and Roma Platforms and CSOs, especially when programming ESF+ programmes.

In fact, according to article 3 (c) (ii) and article 4 (c) (iii) of the [Commis-](#)

[sion Delegated Regulation](#) (EU) No 240/2014 on the European code of conduct on partnership in the framework of the European Structural and Investment Funds, Member States shall identify the relevant partners to involve in the Partnership Agreement and operational programmes. *This includes other organisations or groups that are significantly affected or likely to be significantly affected by the implementation of the ESI Funds, in particular*

groups considered to be at risk of discrimination and social exclusion.

Moreover, according to article 7 of the same regulation, Member States should provide a list of partners involved in the Partnership Agreement and the actions taken to involve the relevant partners in the preparation of the programmes and their amendments.



Article 6 Partnership and multi-level governance (CPR)

1. Each Member State shall organise a partnership with the competent regional and local authorities. That partnership shall include at least the following partners:
 - (a) urban and other public authorities;
 - (b) economic and social partners;
 - (c) relevant bodies representing civil society, environmental partners, and bodies responsible for promoting social inclusion, fundamental rights, rights of persons with disabilities, gender equality and non-discrimination.
2. In accordance with the multi-level governance principle, the Member State shall involve those partners in the preparation of Partnership Agreements and throughout the preparation and implementation of programmes including through participation in monitoring committees in accordance with Article 34.

Finally, the new EU Roma Strategic Framework establishes that *the role of the NRCP should be strengthened, so that it can be involved (by EU fund managing authorities) in the coordination of cross-governmental discussions on the distribution of EU funds for Roma, and in systematic monitoring of their use (e.g. through monitoring committees, Roma inclusion impact screenings)*. The new Framework also reinforces the importance of involving equality bodies in these management cycle of EU Funds: *Member States should ensure that equality bodies are closely involved in and can contribute effectively to designing, implementing, monitoring and reviewing national Roma strategic frameworks for equality, inclusion and participation and relevant Union funds programmes, including involving equality bodies in structures set up to over-*

see the implementation, monitoring and review of national Roma strategic frameworks, and in committees for monitoring relevant Union funds.

Recommendations

Benefits

18.

Involvement of the NRCP and the Equality Body

Involve the NRCP and Equality Body in the drafting process of the Partnership Agreement and EU Cohesion Funds programmes 2021-2027.

It ensures that references to Roma equality and inclusion included in the Partnership Agreement are aligned with the NSPF and EU recommendations thus guaranteeing it complies with existing laws and regulations. The involvement of the Equality Body contributes to ensuring that the non-discrimination principle is implemented effectively.

19.

Involvement of Roma CSOs

Involve Roma CSOs in the drafting process of the Partnership Agreement and EU Cohesion Funds programmes 2021-2027 to ensure it considers their opinion.

It ensures that references to Roma equality and inclusion included in the Partnership Agreement take into account the needs and opinions of Roma representative and grassroots organisations.

20.

Adequate involvement of actors

Prepare a list of actors involved detailing the actions taken to involve them. Remember that these actions should guarantee they are not merely informative and that should be transparent. In this sense, ensure that:

It involves a variety of representatives, giving the opportunity to smaller and grass-root organisations to participate.

It gives transparent information on the process and the information that is being shared and consulted

It identifies the key stakeholders, fosters Roma participation and empowerment and complies with article 7 of the European Code of Conduct on Partnership in the framework of the European Structural and Investment Funds.

and gives the opportunity to send feedback with sufficient time to respond.

It encourages and support the participation of a variety of Roma representatives, especially women and young people.

Strengthening the administrative capacity of stakeholders for managing EU funds for Roma equality and inclusion

According to Article 8(2), an appropriate amount of ESF+ resources under shared management must be allocated in each programme for the capacity building of social partners and civil society organisations. Therefore, support for the capacity building of civil society organisations, including those representing Roma communities, remains a priority. The Code of

Conduct on partnership remains in force for the preparation of the post 2020 programmes and throughout all the stages of implementation.



Article 8 Partnership (ESF+)

[...]

2. Member states shall allocate an appropriate amount of ESF+ resources under shared management in each programme for the capacity building of social partners and civil society organisations.

Finally, the new EU Roma Strategic Framework establishes that capacity building of Roma, civil society and public authorities must be ensured, building cooperation and trust between stakeholders and between Roma and non-Roma communities.

Recommendations

21.

Capacity building of actors

Design regular capacity building activities for stakeholders involved in the management cycle of EU Cohesion Funds 2021-2027.

It identifies the key stakeholders, fosters Roma participation and empowerment and complies with article 7 of the European Code of Conduct on partnership in the framework of the European Structural and Investment Funds.

Checklist to **ensure** programming documents **contribute** to **Roma equality and inclusion** more effectively

The checklist included in this section has been designed to help departments responsible for programming EU Cohesion Funds 2021-2027 in Member States and the EU to move forward towards a more effective programming that makes a real difference thus it should serve as a guide to achieve the following improvements:

-  A greater and explicit commitment with social inclusion, equal opportunities and non-discrimination of Roma by Member States when planning EU Cohesion Funds 2021-2027
-  A higher alignment of measures programmed with EU regulations and recommendations and particularly with the challenges and objectives identified in the NSPF, EU Semester and CSRs
-  A better combination of mainstream and target approach to Roma equality and inclusion to ensure sustainability
-  More ambitious measures that allow Member States to plan and implement long-term and large-scale programmes
-  More regional programmes that foresee measures under the Specific Objective on Roma equality and inclusion in line with the NSPF's objectives and adapted to the challenges of each territory



Increase the programming of integrated measures aligned with the NSPF's objectives and CSRs, Country Report challenges and the EU Semester



More comprehensive and integrated interventions aimed at Roma families, children, young people, women and EU mobile Roma are programmed



More comprehensive and long-term integrated measures that combine ESF+ with ERDF are programmed, reinforcing the complementarity use of these funds



A higher involvement of the NRCP, Equality Bodies (EB) and Roma Civil Society Organisations (CSOs) in the programming phase (and entire management cycle) of EU Cohesion Funds through adequate and quality participatory processes



Strengthening the administrative capacity of stakeholders for managing EU funds for Roma equality and inclusion

The items and questions included in the checklist are based on the key programming documents that Member States have to elaborate when planning the implementation of EU Cohesion Funds 2021-2027:



Partnership Agreement

Aligned with the template included in the regulation



ESF+ Programmes

Aligned with the template included in the regulation



ERDF Programmes

Aligned with the template included in the regulation



Other key recommendations

To ensure EU Cohesion Funds contribute to Roma equality and inclusion more effectively

What will be the contribution of EU Cohesion Funds 2021-2027 in my country to achieve Roma equality and inclusion?



Before you start planning and revising the checklist in detail, we propose that you reflect on the following key questions that will help you establish your goals (based on the challenges and situation analysis included in your NRIS/NSPF).

What will be the contribution of EU Cohesion Funds 2021-2027 in my country to achieve Roma equality and inclusion?

Goal 1

Goal 2

Goal 3

What will be the priority areas in my country?



Education



Employment



Reducing poverty & exclusion



Preventing antigypsyism & discrimination



Housing



Participation



Healthcare

What Specific Objective will my country choose to programme measures?

- (i) Improving access to employment and activation measures of youth in particular (including the Youth Guarantee)
- (ii) Modernising labour market institutions and services to anticipate skills and ensure tailor-made support
- (iii) Promoting women's labour market participation
- (iv) Improving the quality, inclusiveness, effectiveness and labour market relevance of education and training systems
- (v) Promoting equal access to and completion of quality and inclusive education and training
- (vi) Promoting lifelong learning
- (vii) Fostering active inclusion
- (viii a) **Promoting socio-economic integration of marginalised communities such as the Roma**
- (viii b) Promoting socio-economic integration of third country nationals
- (ix) Enhancing the equal and timely access to quality, sustainable and affordable services
- (x) Promoting social integration of people at risk of poverty or social exclusion
- (xi) Addressing material deprivation

What will be the geographical scope?

- National OP
- Regional OP

What approach will my country take when programming?

- Target & mainstreaming
- Only target
- Only mainstreaming

What timeframe will my country promote for the chosen measures?

- Short-term & long-term
- Only long-term
- Only short-term

What funds will my country use to programme measures?

- ESF+
- ERDF
- Asylum and Migration Fund
- Recovery and Resilience Facility
- Other

What type of measures will my country programme?

- Adjustments, adaptations and explicit mention to Roma in mainstream measures funded by EU Cohesion Funds to ensure they are inclusive
- Targeted long-term and integrated measures to prevent and reduce school failure and early-school leaving among Roma girls and boys
- Targeted long-term and integrated measures to improve the employability and access to salaried employment among Roma, including those aimed at reducing the digital gap
- Targeted long-term and integrated measures to promote entrepreneurship, social economy or self-employment among Roma. Measures to particularly tackle the precarious sectors, such as street vending among others, where a large part of Roma work
- Targeted long-term and integrated measures to promote Roma equality among men and women and foster women empowerment
- Targeted long-term measures to promote equal treatment and non-discrimination of Roma, with special attention to antigypsyism
- Measures aimed at preventing and providing assistance to victims of discrimination on the ground of racial and ethnic origin, with explicit reference to Roma

- Long-term and integrated measures to reduce or prevent poverty and the exclusion of families, with special attention to child poverty
- Training and sensitisation of public services personnel, especially social services, education, employment, health and housing, on the specific needs/problems faced by Roma people
- Promote transnational cooperation for searching for common solutions related to Roma equality, inclusion and non-discrimination between Member States, including programmes to address the particular challenges of EU mobile Roma
- Promote innovative actions and experimentation aimed at promoting Roma equality and inclusion, with special attention to those most at risk of poverty.
- Targeted long-term and integrated measures to promote access to early-childhood education
- Targeted long-term and integrated measures to promote access to housing and other key services (social and health services) among Roma
- Targeted long-term and integrated measures to address the economic and social consequences of COVID-19 among Roma

What institutions and organisations will be involved in my country in the management cycle?

- NRCP
- Equality Body
- Roma CSOs
- Regional Roma policies departments

What type of capacity building activities will my country organise?



The Partnership Agreement

How can the PA contribute to a greater and explicit commitment with social inclusion, equal opportunities and non-discrimination of Roma?



Challenges related with the social inclusion, equal opportunities and non-discrimination of Roma is explicitly referred to in Table 1: Selection of policy objective with justification based on consistent data that will be updated recurrently during the programming period, paying special attention to priority groups (women, children and EU mobile Roma).



Challenges related with the social inclusion, equal opportunities and non-discrimination of Roma is explicitly referred to in section 2 Policy choices, coordination and complementarity based on consistent data that will be updated recurrently during the programming period, paying special attention to priority groups (women, children and EU mobile Roma).



The NSPF adopted by the Member State fulfils the criteria set for the ESF+ specific enabling condition.

How can the PA contribute to better align its objectives with EU regulations and recommendations and its NSPF?



The current Roma inclusion Framework and the NSPF objectives (new EU Roma Strategic Framework) as well as the CSR/Country Report is referred to in the Table 1: Selection of policy objective with justification.



The current Roma inclusion Framework and the NSPF objectives (new EU Roma Strategic Framework) as well as the CSR/Country Report is referred to in section 2 Policy choices, coordination and complementarity.

How can the PA contribute to increase the use of complementarity between ESF+ and ERDF for targeted measures to promote social inclusion, equal opportunities and non-discrimination of Roma?



The PA allocates funds for ERDF and ESF+ in the policy objective 4 in the *Table 4: Preliminary financial allocation from ERDF, CF, ESF+, EMFF by policy objective* to address key priorities and objectives defined in the NSPF.

Your notes

ESF+ Programmes

How can the ESF+ contribute to a greater and explicit commitment with social inclusion, equal opportunities and non-discrimination of Roma?



Challenges and situation analysis related with the social inclusion, equal opportunities and non-discrimination of Roma is explicitly referred to in section 1 Programme strategy: main development challenges and policy responses based on consistent data that will be updated recurrently during the programming period, paying special attention to priority groups (women, children and EU mobile Roma).



The Specific Objective (*viii*) **Promoting socio-economic integration of marginalised communities such as the Roma** is selected in section 2 Priorities other than technical assistance, especially in countries with specific references in CSR and Country Report.

How can the ESF+ contribute to better align its objectives with EU regulations and recommendations and its NSPF?



National or regional ESF+ programmes refer to the challenges related with Roma equality and inclusion in the section 1 Programme strategy: main development challenges and policy responses making an explicit reference to CSRs and the country report, when applicable, and to the challenges identified by the European Commission in the Report on the implementation of national Roma integration strategies, paying special attention to priority groups (women, children and EU mobile Roma).



National or regional ESF+ programmes include a needs analysis on Roma exclusion and discrimination detailing what needs will be prioritised based on NSPF objectives and consistent data/source that will be updated recurrently during the programming period (e.g. EU-MIDIS FRA).

How can the ESF+ foster the combination of mainstream and target approach to Roma equality and inclusion to ensure sustainability?



ESF+ National programmes include targeted measures from the key recommended strategic actions under section 2. Priorities other than technical assistance, preferably linked to the Specific Objective *(viiiia) Promoting socio-economic integration of marginalised communities such as the Roma* but also linked to other [Specific Objectives](#).



ESF+ Regional programmes include targeted measures from the key recommended strategic actions under section 2. Priorities other than technical assistance, preferably linked to the Specific Objective *(viiiia) Promoting socio-economic integration of marginalised communities such as the Roma* but also linked to other Specific Objectives.



ESF+ National or Regional programmes explicitly refer to the particular needs of Roma in mainstream measures foreseen in the different Specific Objectives or establish safeguards/positive actions to ensure it also benefits Roma.



ESF+ National or Regional programmes, when selecting key recommended strategic actions take into account the particular needs of women, children and EU mobile Roma.



ESF+ National or Regional programmes, when selecting key recommended strategic actions prioritise early interventions.



National or Regional ESF+ programmes, whether opting for targeted or mainstream measures, introduce in section 2.1.1.2 Indicators an output indicator related with Roma beneficiaries and establish an adequate reporting mechanism.



National or Regional ESF+ programmes refer to Roma among the main target group in section 2.1.2 Specific Objective addressing material deprivation.



National or Regional ESF+ programmes, whether opting for targeted or mainstream measures, select interventions related with Roma equality and inclusion in [section 2.1.1.2](#) Indicators:

- 090 | Housing infrastructure (other than for migrants, refugees and persons under or applying for international protection)
- 117 | Measures to improve access of marginalised groups such as the Roma to education, employment and to promote their social inclusion
- 118 | Support to the civil society working with marginalised communities such as the Roma

How can the ESF+ programme more ambitious measures to ensure that long-term and large-scale measures will be implemented?



National or regional ESF+ programmes mention explicitly long-term and large-scale actions within the type of actions listed under [section 2.1.1.1](#) Interventions of the Funds.



National or regional ESF+ programmes prioritise at least one long-term and large-scale operation of strategic importance on Roma equality and inclusion under section 2.1.1.1 Interventions of the Funds linked to mainstream policies or mainstream measures foreseen in other ESF+ Specific Objectives.

How can the ESF+ increase the programming of integrated measures aligned with the NSPF's objectives and CSRs and Country Report challenges?



National or Regional ESF+ programmes foresee among the type of actions under [section 2.1.1.1](#) Interventions of the Funds the following type of interventions, especially aimed at Roma living in extreme poverty:

- 090 | Housing infrastructure (other than for migrants, refugees and persons under or applying for international protection)
- 117 | Measures to improve access of marginalised groups such as the Roma to education, employment and to promote their social inclusion
- These integrated interventions should have the possibility of being funded by ESF+ or ERDF and be connected with mainstream policies at national, regional or local level

How can ESF+ programmes contribute to increase the use of complementarity between ESF+ and ERDF for targeted measures to promote social inclusion, equal opportunities and non-discrimination of Roma?



The ESF+ that programmes the Specific Objective (*viii*) *Promoting socio-economic integration of marginalised communities such as the Roma* foresees the use of ERDF under section 2. *Priorities other than technical assistance*.

ERDF Programmes

How can the ERDF contribute to a greater and explicit commitment with social inclusion, equal opportunities and non-discrimination of Roma?



National or regional ERDF programmes introduce targeted measures or make explicit reference in section 1 *Programme strategy: main development challenges and policy responses* to Roma exclusion and discrimination when referring to vulnerable groups and challenges related especially with policy objective 4 but also to [other objectives](#).

How can the ERDF foster the combination of mainstream and target approach to Roma equality and inclusion to ensure sustainability?



National or Regional ERDF programmes make explicit reference to challenges related with Roma equality and inclusion when defining priorities related with policy objective 4 in section 2 *Priorities other than technical assistance* in particular to priorities related with (in line with NSPF's objectives):

- (ii) improving access to inclusive and quality services in education, training and life-long learning through developing infrastructure
- (iii) increasing the socioeconomic integration of marginalised communities, migrants and disadvantaged groups, through integrated measures including housing and social services

National or Regional ERDF programmes make explicit reference to challenges related with Roma equality and inclusion when defining priorities related with policy objective 1 in section 2 *Priorities other than technical assistance* in particular to priorities related with (in line with NSPF's objectives):

- (iv) developing skills for smart specialisation, industrial transition and entrepreneurship



National or Regional ERDF programmes make explicit reference to challenges related with Roma equality and inclusion when defining priorities related with policy objective 2 in section 2 *Priorities other than technical assistance* in particular to priorities related with (in line with NSPF's objectives):

- (i) promoting energy efficiency measures



National or Regional ERDF programmes make explicit reference to challenges related with Roma equality and inclusion when defining priorities related with policy objective 3 in section 2 *Priorities other than technical assistance* in particular to priorities related with (in line with NSPF's objectives):

- (i) enhancing digital connectivity



National or Regional ERDF programmes make explicit reference to challenges related with Roma equality and inclusion when defining priorities related with policy objective 5 in section 2 *Priorities other than technical assistance* in particular to priorities related with (in line with NSPF's objectives):

- (i) fostering the integrated social, economic and environmental development, cultural heritage and security in urban areas
- (ii) fostering the integrated social, economic and environmental local development, cultural heritage and security, including for rural and coastal areas also through community-led local development



National or Regional ERDF programmes refer to Roma among the main target group in section 2.1.2 Specific Objective *addressing material deprivation*.



National or Regional ERDF programmes make explicit reference to the challenges related with Roma equality and inclusion in the operations of strategic importance selected under *section 2.1.1.1 Interventions of the Funds*.



National or Regional ERDF programmes, whether opting for targeted or mainstream measures, introduce in [section 2.1.1.2 Indicators](#) an output indicator related with Roma beneficiaries and establish an adequate reporting mechanism.



National or Regional ERDF programmes, whether opting for targeted or mainstream measures, select interventions related with Roma equality and inclusion in *section 2.1.1.2 Indicators*:

- 090 | Housing infrastructure (other than for migrants, refugees and persons under or applying for international protection)
- 117 | Measures to improve access of marginalised groups such as the Roma to education, employment and to promote their social inclusion
- 118 | Support to the civil society working with marginalised communities such as the Roma

How can ERDF programmes contribute to increase the use of complementarity between ESF+ and ERDF for targeted measures to promote social inclusion, equal opportunities and non-discrimination of Roma?



National or regional ERDF programmes that select policy objective 4 foresees the use of ERDF under *section 2. Priorities other than technical assistance* and include actions that make an explicit reference Roma equality and inclusion challenges identified in the NSPF, CSRs or Country Report under *section 2. Priorities other than technical assistance*.

Other key recommendations

How can departments responsible of EU Cohesion Funds 2021-2027 contribute to programme more ambitious measures for Roma equality and inclusion?



Agreeing key priorities with the NRCP to establish what will be the contribution of EU Cohesion Funds to the NSPF's objectives and CSRs or Country Report challenges to ensure that measures programmed especially under the Specific Objective (*viii*) *Promoting socio-economic integration of marginalised communities such as the Roma* contribute to the selected priorities.

Fostering and encouraging that long-term and large-scale measures are programmed within ESF+ or ERDF in the type of actions that are included in *2.1.1.1 Interventions of the Funds*.



Segregated programmes and services (e.g. housing, health or education) are excluded from receiving funds from EU Cohesion Funds.



National and/or Regional EU Cohesion Funds programmes make explicit reference to Roma as a target group and foresee possible safeguards or adaptations to guarantee they are inclusive.



National and/or Regional EU Cohesion Funds programmes make explicit reference to Roma equality and inclusion challenges based on consistent data/sources that will be updated recurrently during the programming period (e.g. EU-MIDIS, FRA).

How can departments responsible of EU Cohesion Funds promote that more regional programmes foresee measures under the Specific Objective on Roma equality and inclusion in line with the NSPF's objectives?



Provide specific guidance and support to EU Cohesion Funds regional programming units on the importance of selecting this objective and the priorities of NSPF.

Sharing this document with them would be recommendable.



How can departments responsible of EU Cohesion Funds increase the involvement of the NRCP and Roma CSOs in the programming (and entire management cycle) of EU Cohesion Funds through adequate and quality participatory processes?



NRCP are involved in the drafting of the Partnership Agreement and is included in the list of actors consulted to ensure their involvement throughout the entire management cycle of EU Cohesion Funds.



Roma CSOs are involved in the drafting of the Partnership Agreement and are included in the list of actors consulted to ensure their involvement throughout the entire management cycle of EU Cohesion Funds.



NRCP are involved in the drafting of the EU Cohesion Funds programmes, in particular ESF+ programmes.



Roma CSOs and Roma Platform and are involved in the drafting of the EU Cohesion Funds programmes, in particular ESF+ programmes.



Foresee the possibility of programming capacity building activities to improve the involvement and participation of Roma CSOs and representatives in the implementation, monitoring and evaluation of ESF+ programmes.



What should Member States take into account during EU Cohesion Funds planning to ensure a better coherence with future implementation?



Implementing instruments

When planning measures to promote social inclusion, equal opportunities and non-discrimination of Roma, EU Cohesion Funds' programming units should start considering what will be the implementing instruments (direct implementation, call for proposals, public procurement, etc.) and ensure they are adequate to implement integrated long-term and large-scale measures.



Final beneficiaries

During the planning phase, it is vital to consider who the final beneficiaries will be so as to take into account the characteristics of the implementing organisations. This will allow EU Funds programming units to introduce adequate capacity building activities should this be required. In addition, having in mind the final beneficiaries allows the involvement of key actors in the planning process thus having access to better information on the situation analysis and the type of measures that can address existing challenges.



Data collection and evaluation

EU Funds Units should consider what will be the data collection system and evaluation plan to ensure it foresees the possibility of collecting data on the contribution of EU Cohesion Funds to social inclusion, equal opportunities and non-discrimination of Roma. It is essential to assess the capacity and establish a realistic and adequate system from the beginning to ensure monitoring and evaluation is possible.



Role of NRCP

Involving the NRCP in the programming phase is crucial but it is also important to foresee its participation in the Management Committees of ESF+ programmes.

Acronyms

AMF	Asylum and Migration Fund
CSOs	Civil Society Organisations
CSRs	Country Specific Recommendations
EAFRD	European Agricultural Fund for Rural Development
EC	European Commission
EB	Equality Body
ESF	European Social Fund
ESF+	European Social Fund Plus
ERDF	European Regional Development Fund
EU	European Union
FRA	Fundamental Rights Agency of the European Union
NEET	Not in Employment, Education or Training
NRCP	National Roma Contact Point
NRIS	National Roma Inclusion Strategy
NSPF	National Strategy Policy Framework
PA	Partnership Agreement
RRF	Recovery and Resilience Facility
SURE	European instrument for temporary Support to mitigate Unemployment Risks in an Emergency

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